

SHAPING THE BOROUGH DRAFT LOCAL PLAN (JULY 2019)

CONSULTATION REPORT



JUNE 2020

Shaping the Borough - Waltham Forest Draft Local Plan (July 2019) Consultation Report Schedule of Comments and the Council's Response

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Introduction

Waltham Forest Council is preparing a new Local Plan (Shaping the Borough 2020-2035) that will set out planning policy across the borough over the next 15 years. As agreed in the Council's Statement of Community Involvement (2018), we are publishing a consultation report at each stage of the plan-making process.

Our draft Local Plan document went out to public consultation between 22 July and 30 September 2019 following the requirements of Regulation 18 stage of the Town and Country Planning (Local Planning) (England) Regulations 2012. This consultation report sets out all comments submitted during that period, and the responses of officers.

As part of the consultation work, introductory leaflets were delivered to all households and businesses across the borough. Three separate leaflets were produced for the three geographic areas of the borough - North, Central and South - outlining the proposed policy approach for managing growth and change in these areas. To gain further public awareness, the Council also published this information in the Waltham Forest Magazine (wfm), distributed to all homes in the borough. A formal public notice was also published in this magazine (Issue 228, Summer 2019).

In addition, emails were sent out to all registered contacts on the Council's Planning Policy Consultation Portal (Objective). This includes residents, stakeholders and specific/general consultation bodies.

These measures were followed by a series of local consultation events:

- Wednesday 31 July, 6pm to 8.30pm, Chingford Assembly Hall, Station Road, Chingford, E4 7EN.
- Saturday 4 August, 2pm to 9pm, Waltham Forest Mela, Leyton Jubilee Park, Seymour Road, Leyton, E10 7BL.
- Friday 9 August, 9.30am to 11am, Planning Agents briefing breakfast on draft Local Plan, Town Hall, Forest Road, Walthamstow, E17 4JF.
- Monday 12 August, 4pm to 8.30pm, Score Centre, 100 Oliver Road, Leyton, E10 5JY.
- Thursday 15 August, 4pm to 8.30pm, Wood Street Library, Forest Road, Walthamstow, E17 4AA.
- Saturday 31 August, 1pm to 8pm, Chingfest, Ridgeway Park, Old Church Road, Chingford, E4 6RS.
- Saturday 7 September, 10am to 4pm, Hale End Library, Castle Avenue, Highams Park, E4 9QD.
- Saturday 14 September, 10am to 3pm, Walthamstow Wetlands, 2 Forest Road, London N17 9NH.
- Wednesday 18 September 2019, 11am to 4pm, Main Outpatients Department, Lower Ground Floor, Whipps Cross Hospital, Whipps Cross Road, Leytonstone, E11 1NR.
- Wednesday 11 September 2019, 7pm to 8.30pm, Chingford Assembly Hall, Station Road, Chingford, E4 7EN. This was a focus group workshop event.
- Monday 16 September 2019, 7pm to 8.30pm, Canons Farm Kitchen, 102 Cann Hall Road, Leytonstone, E11 3NJ. Focus group engagement event with Cann Hall Area Residents' Association (CHARA) committee. This event was only for people invited by CHARA.



- Tuesday 17 September 2019, 12.30pm to 2pm, Walthamstow Connecting Conversation on draft Local Plan, The Garden Room, The Mill, 7-11 Coppermill Lane, Walthamstow, E17 7HA. This was a focus group workshop event.
- Wednesday 18 September 2019, 5pm to 6pm, Innovation Lab, Town Hall, Forest Road, Walthamstow, E17 4JF. Waltham Forest Youth Forum consultation.
- Saturday 21 September, 10am to 5pm, Leytonstone Library, The Space, Leytonstone Library, Church Lane, Leytonstone, E11 1HG.
- Monday 23 September 2019, 12.30pm to 2.30pm, Leyton Connecting Conversation on draft Local Plan, Community Room, The Score Centre, 100 Oliver Road, Leyton, E10 5JY. This was a focus group workshop event.

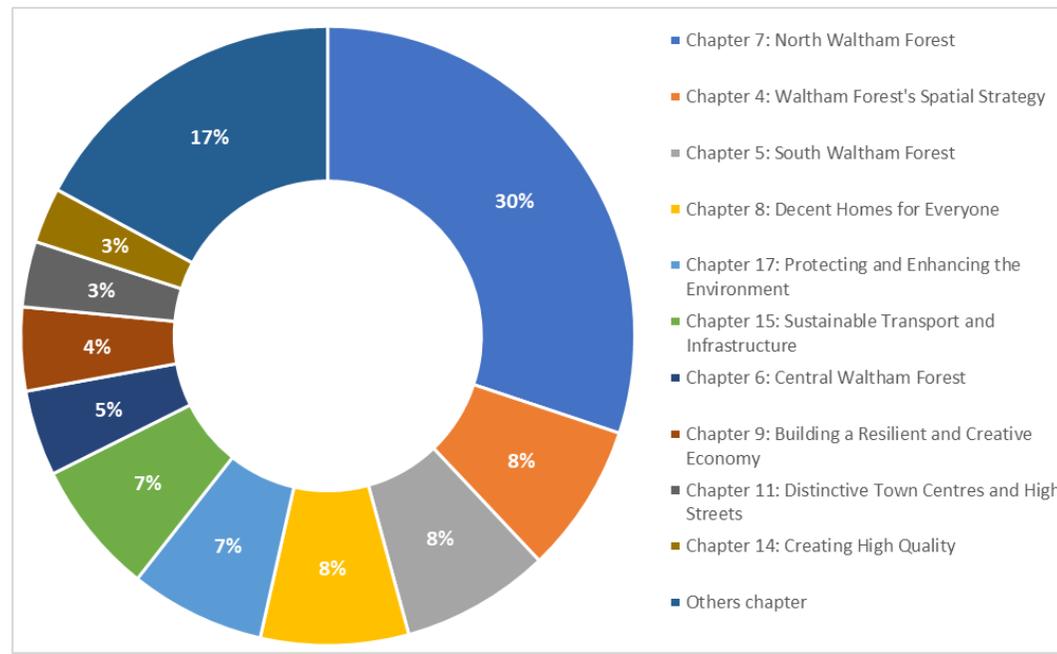
- Friday 27 September 2019, 12noon to 2pm, Leytonstone Connecting Conversation on draft Local Plan, Epicentre, 41 West Street, Leytonstone, E11 4LJ. This was a focus group workshop event.

Response to the consultation

401 submissions were made (342 from individuals and 59 from organisations) involving 2,655 comments. There were two signed petitions: from Save our Suburbs and Highams Park Residents.

This consultation report lists all the individual comments made and the Council’s response to each. These will inform the next iteration of the Local Plan – the Proposed Submission Version. This document will be published for final consultation in autumn 2020.

Figure 1: Most frequently commented upon sections of the Draft Plan (in order of significance)



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Summary of Main Issues

	Issue	Comment /Action
1	Impact of growth on character of local areas arising from growth targets, intensification/higher density and tall buildings.	<p>There is public expectation that plan targets for housing growth would be reduced. This matter is being considered.</p> <p>Officers have commissioned further work on building height/tall buildings.</p> <p>It is proposed to amend the policy on intensification for better clarity and interpretation, also referring to building height.</p>
2	Relationship between the Council's Local Plan and the Highams Park Neighbourhood Plan – that the Local Plan must take into account the policies and proposals of the Highams Park Neighbourhood Plan.	Officers' position is that a neighbourhood plan cannot determine the strategic direction of the Local Plan. Rather, a neighbourhood plan must be in conformity with the Local Plan and deliver the strategic aspirations for the local area as set at the higher level of the borough-wide Local Plan.
3	The plan should give greater focus to environmental protection - the impact of growth on the natural environment.	The plan will be supported by a Habitats Regulations Assessment and Sustainability Appraisal. Both projects (currently in progress) will assess the impact of plan policies and proposals on the environment.
4	Inadequate protection and recognition given to Special Areas of Conservation (SAC) - in particular, Epping Forest SAC.	Officers are currently working with Natural England, neighbouring boroughs and the GLA on mitigation measures. Current policy approach as set out the draft Plan will be reviewed.
5	The plan needs to give greater focus to health and safety issues.	There has been joint working with the Public Health Team. It is proposed to review the Chapter on Health and Wellbeing for better focus - incorporating health related issues such as air quality/pollution, community safety, social cohesion, noise, active travel, well designed homes for mental wellbeing, etc.
6	Lack of site-specific details.	A site-specific allocations document has been introduced. Work has commenced on this document.
7	Need for supporting social infrastructure (education/schools and health provision) and physical infrastructure (utilities) to support growth.	Work is in progress to support the Plan with an Infrastructure Delivery Plan. It will set out details of the Borough's infrastructure requirements - what is needed, where it is needed and when.
8	Transport implications arising from growth and provision of improved transport infrastructure – rail stations and capacity, bus routes, cycling routes, car parking, car-free developments, road capacity, managing congestion, etc	A strategic transport review has been commissioned and is being undertaken by ARUP.

	Issue	Comment /Action
9	Clarity on Green Belt/MOL de-designation – arising from concerns from CPRE, Save Lea Marshes and some residents.	The draft plan referred to the review of the Green Belt/MOL areas indicating that some land parcels could be de-designated. After careful consideration, this reference in the plan is to be deleted.
10	Protection of open spaces – arising from concerns expressed by Sports England about the need to protect playing fields and residents’ concerns about the loss of open spaces.	Officers are considering the findings of the draft Playing Pitch Strategy and Green Infrastructure Study recently completed and submitted by Consultants. Findings of these studies will be incorporated in the final plan.
11	Improving the quality of residential accommodation and amenity space, how to secure high-quality design through the entire planning and construction process to completion.	There are policies on residential space standards and amenity standards, these will be reviewed and where necessary strengthened. Work is also progressing on the Urban Design SPD.
12	Protection of heritage assets, also relating to Archaeological Priority Zones (APZ). Existing designated zones have not been reviewed for many years and need updating.	Officers are liaising with Historic England in commissioning further work to review existing APZs.
13	Concerns about flooding, water mitigation and rainwater management.	The plan contains policies on flooding. Further evidence on Strategic Flood Risk Assessment (Level 2) is being undertaken and will inform the final plan.
14	The plan needs to properly address the challenges facing town centres. The Council has abandoned the centres in the North of the borough.	Officers intend to review existing designated frontages and designate Primary Shopping Areas in all centres. Work is in progress on a High Street Strategy for some centres.
15	Climate change emergency and the local plan response.	It is proposed to review the Climate Change Chapter of the Plan – incorporating where relevant actions identified from the Climate Emergency Commission.
16	Affordable Housing has been raised as a high priority for residents particularly providing social housing and housing that is genuinely affordable for people living in the borough.	Officers intend to follow the GLA/ Mayor of London’s approach on affordable housing as it has been delivering results. In terms of delivering social housing, the Council response is through direct delivery of social housing and other affordable housing. Officers will be preparing an Affordable Housing and Viability SPD to support the Plan.
17	Issues were raised by respondents on how best to meet the housing requirements of an aging population.	Officers will review the policies around housing for older people, in addition to other wider housing needs, with Housing Strategy and Adult Social Services.

	Issue	Comment /Action
18	The approach to industrial intensification has been raised by the GLA that it needs to be modified to be in general conformity with the London Plan. Developers and landowners have made comments about wanting to deliver residential on Strategic Industrial Land, which is not in accordance with draft London Plan policies.	<p>Officers have been working with the GLA to respond to their comments and are working on a borough-wide Industrial Land Audit to better understand what exists and if it is being efficiently used. Where inefficiency is found this presents a possible opportunity for industrial intensification and may be realised in future for alternative uses.</p> <p>To ensure that there is sufficient guidance and certainty for developers and landowners on this approach, and to let them know where opportunities for industrial land release or further industrial intensification may be and how it can be delivered.</p>



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ID	Full Name	Organisation	Comment	Council (Officers) Response
366	Mike Chrimes		The long version of the draft plan is full of planners' jargon and unfortunate factual errors.	The plan contains a section on glossary. This provides a summary of technical words or phrases used in the document. It is proposed to review this section of the document and provide additional definitions if this would be helpful to plan readers. It is also proposed to review the plan - better proof reading to check and correct identified factual errors.
672	Mr Peter O Kane		Overall the draft is vague, lacks definitions and supporting evidence.	The Council will review the document and where necessary capture the gaps in definitions and provide better referencing to the evidence base.
692	Stuart Edwards		Whole plan comments - the area is losing its character already. What will the next 15 years look like? Are you going to listen to us or is it already decided? No true environment policy. Key challenge - how to counteract the Council. Changes - a truly green sustainable policy with thought and variation. Older people's concerns count as well.	Chapter 3 sets out Waltham Forest Council's vision for the borough by 2035. This consultation seeks to gather public views on the contents of the draft Plan to inform the next iteration of the Plan. Issues raised by all groups including the elderly population will be carefully considered by the Council.
769	Aviva Life and Pensions UK		Excluding site BEA16 under Paragraph 9.16 as suitable for co-location is not justified with regard to the 'soundness' tests set out under Paragraph 35 of the NPPF 2019. Part B of Policy E7 of the Draft London Plan Consolidated Changes Version (July 2019) states that scope for co-locating industrial uses with residential and other uses may be considered in LSIS (which are the same as BEAs). It is premature to exclude BEA16 now and inappropriate to do so. This runs entirely counter to the stated priorities and objectives for the North Circular Corridor Strategic Location. In terms of national guidance, Paragraph 8 of the NPPF 2019 outlines the three overarching objectives for the planning system under the overall objectives of achieving sustainable development. Part (a) of the paragraph states the economic objective "to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places at the right time to support growth, innovation and improved productivity. Chapter 11 of the NPPF seeks to promote effective use of land in	The comment is noted. The Council has commissioned an Employment Land Audit, which will assess how industrial intensification can be achieved in the borough, including setting out specific industrial areas where significant change is expected to come forward. The policy will also be updated to ensure general conformity with the London Plan policy E7.

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			<p>meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions (Paragraph 117). Paragraph 118 states that planning policies and decisions should “(a) encourage multiple benefits from both urban and rural land, including through mixed use schemes. Part (d) of Paragraph 118 seeks to “promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively. There is very good opportunity for the new Local Plan to facilitate the more effective use of Deacon Trading Estate at Cabinet Way in response to paragraphs 117 and 118 of the NPPF - in terms of encouraging multiple benefits from this land through a mixed-use scheme and additionally meeting identified needs for housing where land supply is constrained. The ambition for the site reflected in the Local Plan should be much greater than in the draft Local Plan as published for consultation. Paragraph 31 of the NPPF specifies that the preparation of all policies should be underpinned by relevant and up-to-date evidence. “This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals. However, market evidence is not used to support and justify the omission of BEA16 from the list of sites under draft Local Plan Paragraph 9.16. For all these reasons, the omission of BEA16 under Paragraph 9.16 from the list of BEAs that are considered suitable for co-location is not justified, effective or consistent with other policies in the Local Plan, nor the emerging strategic plan for London or NPPF.</p>	
774	LVRPA	Lee Valley Regional Park Authority	The references to the Regional Park that are now included within the Spatial Strategy and across a number of the thematic policies are supported.	Noted. Support welcomed.

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780	Ms Tessa Craig		Canal and River Trust manages the River Lee Navigation and associated towpath to the south west of the borough, within and bordering the South and Central Waltham Forest Areas. It is important that The Plan recognises, references and promotes the Lee Navigation as well as the River Lea.	This comment is noted for clarification.
861	Mr Roger Brown	Chair, Love North Chingford	The aims of the draft Local Plan are largely admirable, but in North Chingford the required level of detail is lacking: We understand high-level plan objectives, but it contains far too little local information to signpost development intentions of the Council here, or offer guidance for developers, when all know that substantial intensification is planned at our key town centre sites. In the absence of a promised SPD, LNC are not confident adequate detail and safeguards will be forthcoming in documents flowing from the plan or AIP, as is the case in the current plan. The Draft is big on aspiration but lacks local detail, local distinctiveness and the community needs. To quote from the Council: The Direction of Travel document seeks to identify the key issues and policy directions, which will inform the preparation of the draft Local Plan. This will contain detailed policies. This is not yet achieved as regards North Chingford Centre.	The Council is preparing an additional Local Plan document on site specific allocations. This will provide opportunity to apply the policies of the plan to specific sites, providing more details on how new developments could be integrated within existing local areas. This document will be prepared with public participation providing the opportunity for resident views to shape the nature and form of development likely to be considered acceptable.
879	Lauren Keeling	Planning Officer, Essex County Council	ECC recommends that LBWF engage with ECC officers and members on an active and ongoing basis covering cross-boundary strategic matters to ensure the Local Plan is deliverable and viable. This covers ECC's role as the strategic transport and highways authority, Local Education Authority, Lead Local Flood Authority, and lead advisors on public health and adult social care. ECC can provide advice to ensure that the evidence supporting the emerging Local Plan is consistent from an Essex perspective. LBWF Councils will need to ensure the duty is also undertaken with the Epping Forest District Council (EFDC). ECC in its capacity as the Minerals and Waste Planning Authority (MWPA) notes and supports references to the	These comments are noted for discussion and inclusion.

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			London Plan and the North London Waste Plan as being part of the Development Plan relating to the LBWF. ECC is currently progressing a Statement of Common Ground with officers working on the North London Waste Plan (NLWP).	
1007	Lauren Lavinieri		General - I note that a number of the evidence base documents are still in progress. As such it is difficult to comment on the implications of some of the policies or understand if this will result in additional changes to the policies map. Therefore, new substantive issues may be raised at the next plan stage.	This comment is noted. Outstanding evidence base documents when completed will be published on Waltham Forest Council's website.
1020	Ms Alison Blom-Cooper	Planning Department, Epping Forest District Council	Overall, the Draft Local Plan does not appear to have been subject to sustainability appraisal.	The plan is supported by Sustainability Appraisal. This document is published on Waltham Forest Council's website.
1021	Ms Alison Blom-Cooper	Planning Department, Epping Forest District Council	The proposed levels of development in the plan do not appear to have been subject to Habitat Regulations Assessment (HRA).	Noted. The Council is in the process of conducting a Habitats Regulation Assessment, which will be published ahead of the Regulation 19 Consultation on the Local Plan.
1022	Ms Alison Blom-Cooper	Planning Department, Epping Forest District Council	This lack of information is an issue as the potential impacts of development proposed in the Draft Local Plan do not appear to have been a consideration in the development of the spatial strategy. The impacts of the development contained in the Draft Local Plan, on the EFSAC, may be the most relevant limiting factors on development in the borough and are likely to be the most significant 'cross boundary' impacts as they relate to the Epping Forest District administrative area.	Noted for consideration. The Council is currently preparing a Sustainability Appraisal document and HRA document. In order to satisfy the planning inspectorate, these will from the outset need to align with work being completed by our colleagues at Epping Forest District Council and The City of London Corporation / Conservators of Epping Forest.
1040	Ms Alison Blom-Cooper	Planning Department, Epping Forest District Council	General presentational point. It would be helpful if the Council, rather than refer to 'Epping Forest' refers to 'the Epping Forest'. This is in order to make clear the differentiation between the Forest and the Epping Forest District administrative area.	This point is noted. It is proposed to make reference to 'the Epping Forest'.

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1090	Milena Petrovic	Sustainable Development Officer, Thames Team Natural England	We were not formally consulted by London Borough of Waltham Forest (LBWF) on this Draft Local Plan. However, it was brought up at a meeting with the council on 9th September 2019.	This comment is acknowledged. The consultation was sent direct to an officer who is believed to have left for a secondment to another government department at the time.
1103	Milena Petrovic	Sustainable Development Officer, Thames Team Natural England	The Local Plan should be underpinned by up to date environmental evidence. This should include an assessment of existing and potential components of local ecological networks. This assessment should inform the Sustainability Appraisal, ensure that land of least environment value is chosen for development, and that the mitigation hierarchy is followed and inform opportunities for enhancement as well as development requirements for particular site.	Noted. A Habitats Regulations Assessment (HRA) is currently being produced alongside the Sustainability Assessment and the Local Plan.
1104	Milena Petrovic	Sustainable Development Officer, Thames Team Natural England	A Sustainability Appraisal and Habitats Regulations Assessment will need to be undertaken before the final version of the Local Plan is submitted. We may need to reconsider our response in light of any of the findings of these assessments. Much of the development proposed in this Local Plan falls within the impact risk zones of Epping Forest SAC and/or Lee Valley SPA. As such the Local Plan should be screened under Regulation 105 of the Conservation of Habitats and Species Regulations 2017 (as amended) as soon as possible so that outcomes of the assessment can inform key decision making on strategic options and development sites. It may be necessary to outline avoidance and/or mitigation measures at the plan level, which will usually need to be considered as part of an Appropriate Assessment, including a clear direction for project level HRA work to ensure no adverse effect on the integrity of internationally designated sites. LBWF may also need to consider cross-boundary approaches, given Lee Valley and Epping Forest cover more than one Local Planning Authority. There is some wording in the Local Plan that encourages	These comments are noted for inclusion in Waltham Forest Council's ongoing HRA commission.

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			<p>recognition and even promotion of Walthamstow Wetlands and Epping Forest as places of leisure, encouraging residents to visit (e.g. page 12 "Waltham Forest as a place of leisure"; page 46 "Central Waltham Forest, point K" and Policy 15, point 6). Whilst we support encouraging access to existing and future open green spaces, we advise caution in specifically mentioning Epping Forest SAC and Lee Valley SPA/Walthamstow Wetlands given existing recreational pressures on the sites. Policies that encourage increased visitor numbers to these sites may need to be considered in the HRA to show that there would be no Likely Significant Effect from increased recreational pressure. Please note there is no mention of Chingford Reservoirs SSSI in the Local Plan; this site may need to be included in the SA given its proximity to the borough. For more information on sources of local plan evidence on the natural environment, please see the associated document, attached in the covering email for this Local Plan response. Natural England would welcome discussion with LBWF on the emerging Local Plan SA and HRA.</p>	
1111	Ms Patricia Braga		<p>Principally the draft plan does not meet your own criteria for consultation.</p>	<p>This draft Plan has been published for consultation to allow all stakeholders, residents, community groups and indeed everyone with an interest in Waltham Forest to comment on the document at the same time before the Local Plan is finalised. This is to allow opportunity for all competing and conflicting interests to be resolved at a single stage.</p>
1112	Ms Patricia Braga		<p>Whilst understanding the difficulties of such a project I would say that it is Not Fit For Purpose (hopefully this phrase will be now be disposed of) as the plans are not balanced with regard to the true "sustainability" of such a long-term project (especially with regard to climate change/population support/growing food/health and welfare). It may also prove to have wasted money because of its lack of openness and clarity and its presumptive and "misleading" content. Further because so much piecemeal work appears to have already done/put in</p>	<p>This comment is noted.</p>

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			place over the last 5-10 years or more without us knowing how, this has eroded trust/confidence in the council/mayor/government.*	
1230	Thames Water Utilities Ltd	Thames Water Utilities Ltd	<p>New development should be co-ordinated with the infrastructure it demands and take into account the capacity of existing infrastructure. Paragraph 20 of the Revised National Planning Policy Framework (NPPF), February 2019, states: "Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for infrastructure for waste management, water supply, wastewater. Paragraph 28 relates to non-strategic policies and states: "Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure. Paragraph 26 of the revised NPPF goes on to state: "Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary. The web-based National Planning Practice Guidance (NPPG) includes a section on 'water supply, wastewater and water quality' and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that: "Adequate water and wastewater infrastructure is needed to support sustainable development (Paragraph: 001, Reference ID: 34-001-20140306).</p>	<p>These points are noted. The Council recognises the need to work jointly with all utility providers to ensure the coordination of infrastructure delivery. The Local Plan will be supported by an Infrastructure Delivery Plan, which will set out details of the borough's infrastructure requirements. This document will set out what is needed, where it is needed and when it is needed. It will also set out the delivery mechanism to ensure the timely delivery of infrastructure. This document will be published with the final version of the plan. The Council intends to further engage with Thames Water Utilities Ltd.</p>
1285	Joanna Parry		***IN AGREEMENT WITH HPPG LETTER***	<p>These comments are noted. See response to HPPG (Gordon Turpin).</p>

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1476	Sara McDonnell Shacklock		***IN AGREEMENT WITH HPPG LETTER*** Having lived in the area for ten years I have seen the rapid amount of housebuilding that has gone on in a relatively short space of time. I think it unwise to accelerate this development, which eventually will be to the detriment of those who live here. I of course appreciate the need for additional homes to continue to be built in the area, but not at the scale currently proposed. It's simply too many.	These comments are noted and our response will follow on the HPPG Letter.
1532	Ms Mary Manuel		Supplementary Planning Documents - When the Planning Obligations (2017) SPD is updated we would welcome the opportunity to discuss how the NHS Healthy Urban Development Unit's Model for Planning Obligations is referenced to provide the evidence base for securing developer contribution towards health infrastructure.	This point is noted. There will be a separate public consultation for the draft Planning Obligations SPD providing opportunity for all stakeholders, residents, community groups and indeed everyone with an interest in Waltham Forest to comment on the document before it is finalised.
1575	Mr Tim Madelin	Associate Director of Estates (Strategic), NHS North East London Commissioning Alliance	When the Planning Obligations (2017) SPD is updated we would welcome the opportunity to discuss how the NHS Healthy Urban Development Unit's Model for Planning Obligations is referenced to provide the evidence base for securing developer contribution towards health infrastructure.	Noted for consideration.
1890	Sue Crisp		The meeting I attended at St. Peter's and Paul church told local people nothing and any rumoured plans just answered by there is no planning permission in place. Then expect the residents to reply to the plans literally no information of what is planned. Chingford station struggles on a normal commuting day and when there are problems with the line or trains cancelled the train is full by the time it gets to Highams Park. You are planning to have 5 trains running an hour that is only one train more to what is currently happening and the new trains have far less seating so most commuters will be standing the whole journey. The idea of building taller building near to Epping Forest is	This comment is noted. However, the Local Plan has to account for the borough's own housing allocation, which cannot be transferred to other boroughs. It is recognised that intensification could be associated with concerns about new developments being seen as inappropriate to their context and by extension destroying much of what people see as valuable in their daily living environments. However, well managed intensification could provide positive benefits to improve the quality of local environments. The plan contains a range of policies to guide the redevelopment of sites/areas whilst prioritising the protection of local character. In addition, the

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			<p>horrendous spoiling the precious green spaces we have in Waltham Forest, local home owners losing privacy and making movement around the area impossible. Chingford has a mixture of home owners with a lot of elderly residents who are not able to get on and off public transport with heavy shopping or are able to cycle everywhere or walk great distances. To not have considered the amount of new residents this building will bring into the area and the amount of school and doctors places needed until the homes are practically built is ridiculous. To expand existing school or build new schools (with no available land to build one on) will take a considerable amount of time with demand needed far sooner than that. Doctor appointments are so hard to book now and when a urgent same day appointment needed many residents are not able to travel to Leytonstone for an out of hours evening appointment. This has not been thought out. A simpler plan would be to build more housing in places like Harlow which have large areas of land unused with good transport links. Leave Waltham Forest alone it is already full.</p>	<p>Local Plan will be accompanied by an up-to-date Infrastructure Delivery Plan (IDP) when it is published for consultation in the summer of 2020. The IDP will outline the need for schools and health services and how such needed will be met through development.</p>
2087	Mike Sparrow		<p>Your plans are absolutely awful and to propose to ruin such a lovely spot which sits right on the edge of one of London's most ancient forest areas is a travesty. The forest does not need an urban concrete jungle on its' edge, it needs a sympathetically planned market town.</p>	<p>This comment is noted.</p>
2090	Mr Matthew Fletcher	Metropolitan Police Service	<p>We have had a chance to review the documents and wish to make the following representations in regards to robust SBD Conditions in the new Local Plan. This will allow a higher degree of compliance from architects and developers to ensure that they can provide residents with safe and sustainable buildings to live in. SBD Accreditation should be paramount and form part of planning any new development, town centres, public spaces, transport hubs and streets. We are supportive of the</p>	<p>Noted for consideration. Support welcomed.</p>

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			new Local Plan in the fact that it makes mention of crime prevention throughout.	
2151	anonymous response form 2		Even though a planner chaired our group there are no details publicly available on the designated sites for development. Therefore none of us felt able to endorse this plan until you can give in the detail. We were particularly concerned as to what 'intensification' meant and the improved infrastructure, health and schools.	The Local Plan does not allocate sites as this will be the subject of a Sites Allocation document which will be consulted in Autumn of 2020. The comment concerning intensification is noted.
2152	anonymous response form 2		As always in these sort of documents - fine on strategy and mentions but lacking any detail on what the outcomes will be and the impact on our community. We therefore cannot endorse it at this stage. e.g. even high rise developments have not been ruled out.	Comment noted.
2168	anonymous response form 3		The document totally lacks details. The type of detail needed is 300 homes, 1 GP, x number parking spaces, x additional buyses etc etc	Noted. The Local Plan details the strategically assessed housing need for the borough over the plan period. The Council is producing an infrastructure delivery plan that will detail infrastructure such as GP Surgeries that will need to be delivered in the borough over the Plan Period. Policy 72 of the Local Plan covers car-parking standards in the borough for the Plan period although in line with the London Plan, Waltham Forest Council is committed to the delivery of Liveable Neighbourhoods and Healthy Streets in the borough. This means that active modes of travel and public transport will be prioritised in order to improve air quality, provide better public realm and wayfinding, reduce road danger and increase the attractiveness of the district centre to residents and visitors.
2202	Lucy Read	Planning Advisor, Sustainable Places Environment Agency	Flood risk and water-related evidence base supporting the local plan has not been provided. Which means that it has not been demonstrated that the priority locations for growth are located in the areas with the lowest risk from flooding. The flood risk and water quality and resource draft policies are unjustified and not consistent with the national policy. There is No SFRA and	This comment is noted. SFRA work has been undertaken by the Council and will be published on the Council's website.

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			sequential testing of sites No robust evidence base supporting the strategic local policies regarding water resources and quality. Plan lacks a policy that offers protection and enhancement to the borough's river corridors Evidence base not up to date so therefore they find the proposed submission unsound, not justified, effective or consistent with national planning policy.	
2282	James Routledge		It seems overall the plan can't change. Also it seems there is no outcome measure so most work is just outcome focused. So it seems unlikely that iteration will be iterated over five years. Probably just knee jerk five-year change will occur. Also seems more build focused over inclusion focused. Also please define 'vibrant neighbourhood' it will help align your change to residents.	The draft Plan has been published for consultation to allow the views of all stakeholders, residents, community groups and indeed everyone with an interest in Waltham Forest to comment. All views would be taken into consideration. The need to define 'vibrant neighbourhood' is noted for consideration and clarification.
2286	Christine Guy		It is noticeable that the North end of the borough has far less spent on local amenities in contrast to the rest of the borough. For some reason this has been the attitude of the council for many years. It is therefore a rather faint hope that when 'Shaping the Borough' the views and opinions of residents in North Chingford will be given consideration and not 'brushed off' as so many feel that is all we will get.	Funding for planning projects very often comes from S106 agreements (under S106 of the Town and Country Planning Act 1990, as amended). Contributions can be sought from developers towards the costs of providing community and social infrastructure in areas where the need has arisen as a result of a new development taking place. Very often such monies can only be spent on facilities where the new development has taken place, at least in part, and contributed to the need for the facilities. The Council is required to prepare a Local Plan in consultation with a wide range of stakeholders, including local residents. Accordingly, all views will be taken into account. However, in practice, sometimes there will be competing and conflicting interests to be resolved. In decision making, the Council must also comply with drivers for change arising from national/London Plan policy requirements.
2298			Cannot access via the info given on the consultation form. Consultation not adequate! Poor	This comment is noted.

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2299	Mr Tim Madelin	Associate Director of Estates (Strategic), NHS North East London Commissioning Alliance	Supplementary Planning Documents – When the Planning Obligations (2017) SPD is updated we would welcome the opportunity to discuss how the NHS Healthy Urban Development Unit's Model for Planning Obligations is referenced to provide the evidence base for securing developer contribution towards health infrastructure.	This point is noted. There will be a separate public consultation for the draft Planning Obligations SPD. This will provide an opportunity for all stakeholders, residents, community groups and indeed everyone with an interest in Waltham Forest to comment on the document before it is finalised.
2408	Mr Roger Brown	Chair, Love North Chingford	Current Plan inheritance: Despite evidence to the contrary, North Chingford was, and is, presented in an unduly upbeat fashion - lacking challenges, and thus documents such as the Town Centre Delivery Plan ignored modest needs, leading to no spend here or support for retail businesses, in contrast with other centres. Our campaign focuses on ensuring this is not repeated. Hopefully this will be remedied practically by better working with Regeneration and some funding, but your comment that references to North Chingford were being 'optimistic' is worrying. Surely you agree planning should be realistic, and certainly not use tourism promotion jargon?	These comments are noted.
2492	London Hotel Group	London Hotel Group	We believe the Local Plan to be sound, whereby it has been positively prepared, justified, effective and consistent with the NPPF.	Noted. Support welcomed.
2513	Miss Victoria Manston	Berkeley Homes, North East London	We are supportive of the Council's ambitious growth agenda, focusing on delivering a significant number of homes in strategic locations and believe the new LBWF Local Plan is fundamental to supporting this.	Noted. Support welcomed.
2526	Ms Katie Glasgow	Planning Officer, Hackney Council	LB Hackney response to LB Waltham Forest Shaping the Borough Draft Local Plan 2020 -2035 (Regulation 18). Thank you for the opportunity to comment on the consultation version of Waltham Forest's Local Plan. We are committed to continuing the engagement between Waltham Forest (LBWF) and Hackney (LBH) during the preparation of Waltham Forest Local Plan and Hackney's Local Plan 2033, under the Duty to Cooperate.	It is noted that LB Hackney supports the overall vision and strategic objectives of the Plan. The Council is willing to engage on any matters of strategic importance across both borough boundaries.

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			Hackney supports the overall vision and strategic objectives as set out in the Local Plan. We would welcome a follow up meeting over the coming weeks to discuss Duty-to-Cooperate matters including both Local Plans in more detail.	

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653	Mr Gordon Turpin	Highams Park Planning Group	There is a general feeling that the sense of community that exists in Highams Park has not been tapped into by the Council as per the emerging London Plan Policy SD10.	It noted that Policy SD10 requires boroughs to use their local knowledge and that of their communities to identify and understand the particular needs of the local areas. The draft plan has been prepared on this basis. The earlier round of consultation at the Direction of Travel (Issues and Options) stage, offered the first opportunity for engagement on the contents of the plan. Following this, the purpose of the draft Plan consultation was to allow further opportunity for all stakeholders, residents, community groups and indeed everyone with an interest in Waltham Forest to comment on the draft plan at the same time before the plan is finalised. As noted under Paragraph 7.1 of the draft plan, the spatial approach recognises the divergent character of local areas including Highams Park and proposes a more locally distinctive policy response for this area. Higham Park is identified as a strategic location. See Policy 20. The Highams Park Neighbourhood Plan when adopted will be part of Waltham Forest Council's development plan. No change is proposed in response to this comment.
727	Mr Gordon Turpin		It is not clear how intensifying housing development meets the requirement for regeneration of the area.	It is recognised that intensification could be associated with concerns about new development becoming inappropriate to their context and destroying much of what people see as valuable in their daily living environments. However, if well managed, intensification could provide positive benefits to

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				improve the quality of local environments as part of regeneration efforts. The plan contains a range of policies to guide the transformation of local areas through regeneration, whilst also protecting green spaces and providing supporting infrastructure.
1390	Emily Wheeler		I'm very concerned about the lack of engagement with the Highams Park planning group (HPPG) in advance of the plans being developed, because this is at odds with community engagement and is a big worry as a local resident. Highams Park residents often feel that plans for our area are made without the involvement or consideration of the people who live here. We would like to ask that this is done in a more meaningful way please going forwards.	The earlier round of consultation at the Direction of Travel (Issues and Options) stage, offered the first opportunity for engagement on the contents of the plan. The Council received a response from the HPPG at this stage. Following this, the purpose of the draft Plan consultation is to allow all stakeholders, residents, community groups and indeed everyone with an interest in Waltham Forest to comment on the Draft Plan at the same time before the document is finalised. This is to allow opportunity for all competing and conflicting interests to be resolved at a single stage, rather than a series of consultation meetings with different groups and stakeholders, which clearly would have significant resource implications.
1468	Ms Hanna Chalmers		Highams Park residents often feel plans affecting the area are made without the involvement or engagement of the people that live there. This needs to happen in a more effective and meaningful way.	The earlier round of consultation at the Direction of Travel (Issues and Options) stage, offered the first opportunity for engagement on the contents of the plan. The Council received a response to the HPPG at this stage. Following this, the purpose of the draft Plan consultation is to allow all stakeholders, residents, community groups and indeed everyone with an interest in Waltham Forest to comment on the draft plan at the same time before the document is finalised. This is to allow opportunity for all competing and conflicting interests to be resolved at a single stage, rather than a series of consultation meetings with different groups and stakeholders, which clearly would have significant resource implications.

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1589	Bob Bennet		It would be helpful if this paragraph also described the status of existing SPD's when the Local Plan is finally adopted.	It is proposed to include text after Paragraph 1.3 to clarify the status of existing SPDs, extant and saved policies.
1590	Bob Bennet		Reference should also be made to the various Article 4 Directions that the Council has adopted during the last few years. The relationship to the individual local plan policies should be set out in the in the relevant policy these should also be made to these under the relevant Policy in the Plan e.g. Policy 32 HMOs.	It is proposed to make appropriate references to the Article 4 Directions currently place under the relevant policies/sections of the Plan as follows: Section 11 (Distinctive Town Centres & High Street) - reference to be made to the A4Ds relating to shops (A1) and Offices (B1A) uses Section 9 - Building a Resilient Economy - reference to be made to A4D on light industrial units Section 9 - Decent Homes - reference to be made to A4D on HMOs.
1659	Christine Lewington		Quite a few suggestions in the plan are contrary to the vision as outlined in the Highams Park Plan developed by the HPPG, a plan based on their unique knowledge of and ongoing consultation with the local residents. I hope the points raised by them will be taken into account going forwards. There is also no explicit commitment to retain Hale End Library, which local residents have fought very hard for, and which again contributes significantly to the "cultural heart" of our community.	Neighbourhood plans are expected to be in conformity with the higher level plan document, in this case Waltham Forest Council's Local Plan. The expectation from national and London Plan policy is that the neighbourhood plans must follow the lead/policy directions of the Local Plan, similar to how the Council's Local Plan must conform with the London Plan. The Plan contains relevant policies protecting social infrastructure and cultural assets including the Highams Park Library. See Policy 55.
1677	Kevin King		I am concerned about the lack of engagement with the Highams Park Planning Group in advance of the plans being developed - this seems to be completely at odds with the idea of community engagement and is concerning. Highams Park residents often feel plans affecting the area are made without the involvement or engagement of the people that live there. This needs to happen in a more effective and meaningful way.	The earlier round of consultation at the Direction of Travel (Issues and Options) stage, offered the first opportunity for engagement on the contents of the plan. The Council received a response from the HPPG at this stage. Following this, the purpose of the draft Plan consultation is to allow all stakeholders, residents, community groups and indeed everyone with an interest in Waltham Forest to comment on the Draft Plan at the same time before the document is finalised. This is to allow opportunity for all competing and conflicting interests to be resolved at a single stage, rather than a series of consultation meetings with different groups

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				and stakeholders, which clearly would have significant resource implications.
1698	Joel Gethin Lewis		Most Londoners and people living in Highams Park understand the need for more housing - there are opportunities as outlined in this letter from the HPPG to build more housing without losing the distinct assets and local character of the area that we have here and the one civic space we have in Highams Park - the purpose-built, recently refurbished and incredibly well utilised library.	The contents of the HPPG letter is noted. See Waltham Forest Council's response to HPPG (Gordon Turpin). With regards to community facilities such as the library, Policy 56 of the draft Plan seeks to resist the loss of existing social or community infrastructure, which includes libraries. Accordingly, no change will be made to the plan in response to this comment.
1700	Joel Gethin Lewis		Highams Park residents often feel plans affecting the area are made without the involvement or engagement of the people that live there. This needs to happen in a more effective and meaningful way.	The earlier round of consultation at the Direction of Travel (Issues and Options) stage, offered the first opportunity for engagement on the contents of the plan. Following this, the purpose of the draft Plan consultation is to allow all stakeholders, residents, community groups and indeed everyone with an interest in Waltham Forest to comment on the draft plan at the same time before the document is finalised. This is to allow opportunity for all competing and conflicting interests to be resolved at a single stage, rather than a series of consultation meetings with different groups and stakeholders, which clearly would have significant resource implications.
1702	Andrea Williams (nee Kingsley)		It is important that the HPPG are consulted when you are considering the development of Highams Park as the group speaks for the residents of Highams Park.	The earlier round of consultation at the Direction of Travel (Issues and Options) stage, offered the first opportunity for engagement on the contents of the plan. The Council received a response from the HPPG at this stage. Following this, the purpose of the draft Plan consultation is to allow all stakeholders, residents, community groups and indeed everyone with an interest in Waltham Forest to comment on the draft plan at the same time before the document is finalised. This is to allow opportunity for all competing and conflicting interests to be resolved at a single stage, rather

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				than a series of consultation meetings with different groups and stakeholders, which clearly would have significant resource implications.
1812	Robert Tatam		The following email text and excerpt was sent to your department (and forwarded to Wfdirect) on 18th September, but no response has been received from either address. This is not only unacceptable in the Council's target dates to reply to queries, but in the situation that the closing date for the above consultation is the next working day from today. I would be grateful if you would furnish this document to me, publish it widely, and allow late submissions on its implications.	Comment noted for consideration. The Council has been working in the Consultation comments to be able to produce a report that will be published.
1813	Robert Tatam		Please send link for the current Sustainability Appraisal. Despite the excerpt below, I am only able to see the 2017 'Direction of Travel' Sustainability Appraisal on your website (some six weeks after the Draft Local Plan was published). Planning legislation requires Councils to carry out a Sustainability Appraisal as part of the plan-making process. Accordingly, this draft Local Plan is supported by a sustainability appraisal. This document is also published on the Council's website.	The Draft Local Plan is supported by Sustainability Appraisal. The document was published for consultation during the period 9 October 2019 to 20 November 2019. Further information is available on Waltham Forest Council's website.
2007	Dr Robert Gay		I attended the meeting at the Epicentre on Friday 27th September. At the meeting we were told that we needed to submit our comments in writing (anything we said in the meeting would not be taken into account as a comment on the draft Local Plan) but that we might comment by email rather than by using the consultation portal, which I am told is 'clunky'. Please accept this email accordingly. I should make it clear that I am writing in my personal capacity only and not on behalf of the Bushwood Area Residents Association. First, I should say that I have not been able to comment in full on the Plan because I have not been able to read anything like all of it. It is a very long document and I am 61 years old and do not take in long documents on screen, and I do not have the time during library opening hours to sit and read for	The Council acknowledges that plan documents could be difficult to read and understand. For this purpose, a Glossary Section is provided. The Council is preparing a Site Allocations document. This will provide further details on storey height, massing etc on identified sites to demonstrate how best new developments could be integrated within existing areas.

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			<p>two or three hours. I do not have facilities to print anything so long. If the Council had made hard copies available on loan to members of the public then I might have been able to read a large part of the document while making journeys by Tube and by train. (I would have asked to borrow the hard copy which was at the meeting at the Epicentre, but it was whisked away as soon as the formal part of the meeting ended.) Secondly, the way in which the Plan is written is such as to prevent meaningful consultation. (I do not mean to suggest that anyone has written it deliberately to make consultation less meaningful, but this is the effect of how it is written). It is lengthy and full of generalities to which no-one would object, such as 'good design' and does not say what is envisaged in concrete terms which members of the public can easily understand. One example of this is that in the text supporting Policy 5, housing densities are given in terms of Floor Area Ratio and Dwellings per hectare, which may be meaningful to persons professionally involved in the planning process, but are not terms which are understood by members of the public such as myself. At the meeting, someone else as well as me pressed for an indication, however informal, of approximately what was envisaged in terms of building heights in storeys and this was refused. The only indication we have is the picture on page 26 of three tower blocks of about 16 storeys under construction.</p>	
2025	Peter Drew		<p>How does the Local Plan respond to the Highams Park Neighbourhood Plan? Will this be taken into account/respected (for example new heights fitting in with rooflines of existing buildings and retaining Highams Parks distinctive character?)</p>	<p>When adopted, the Highams Park Neighbourhood Plan will be part of the Council's development plan. Government policy requires neighbourhood plans to be in general conformity with the strategic policies contained in a Local Plan. A neighbourhood plan cannot dictate the policy approach to be followed in the borough wide Local Plan. The Council intends to work collaboratively with the HPPG to produce complementary neighbourhood and Local Plans.</p>

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2242	Lucy Read	Planning Advisor, Sustainable Places Environment Agency	Most natural resources extend across multiple Local Authority areas. We encourage the Council to make full use of the Duty to Co-operate when revising this draft local plan. Cross-boundary, collaborative working will ensure that strategic priorities across local boundaries are properly co-ordinated. Please consider this when addressing climate change, flood risk, waste management, habitat and biodiversity enhancement, watercourse protection and improvement, water and waste resources.	The Council acknowledges the importance of the duty to cooperate requirement and has been working collaboratively with a number of organisations including the Environment Agency.

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900	Mr Mathew Frith		Welcome to the Forest Para 2.5: We welcome this para and the reference to the green spaces. We suggest that the network of reservoirs, rivers and greenspaces of the Lee Valley are also significant to the character of the borough and should be referenced	In response to this comment, it is proposed to make reference in Paragraph 2.5 to the network of reservoirs, rivers and greenspaces of the Lee Valley, which are also significant to the character of the borough.
961	Mr Mathew Frith		Para 2.1, Table: We don't have the details of the Open Space Strategy or the Green and Blue Infrastructure Study. However, we are concerned that an underlying ecological analysis of the borough is becoming increasingly out of date. The last SINC review was conducted in 2006; this needs to be urgently updated, as well as an assessment of the status of key species and habitats of principal importance.	Work is in progress on the Open Space Strategy. This will be published when ready. The point raised about the review of SINC is noted for consideration.
1271	Josephine Vos	Transport for London- City Planning	It should be noted that this process should not be seen as a binary choice between granting or refusing permission and a variety of options should be explored to ensure the most is made of existing transport infrastructure. The draft London Plan sets out in Policy D1A and its supporting text set out the approach to planning for transport capacity. This can, for example, include phasing development, and in limited circumstances making some homes	This is noted.

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			contingent on the provision of transport improvements. Increasing levels of active travel can also support growth and in some cases reduce additional public transport infrastructure requirements. Other measures can be explored to reduce transport constraints before capacity is expanded, including increasing local bus capacity or demand management measures such as peak-spreading. Developer contributions will play an important role in addressing transport constraints and we welcome Paragraph 4.10 accordingly.	
1591	Bob Bennet		It is stated in this paragraph that the number of businesses has grown by 35% since 2012. Bearing in mind that the number of residents has increased by 20% in the last ten years, some of whom will work in the borough, it would be helpful to set out the number of jobs in those businesses that have also increased in number.	Comment noted. The Employment Land study 2019 provides detailed information on employment trends and characteristics.
2039	Stonecrest Marble Ltd	Stonecrest Marble Ltd	We agree with the Council's broad assessment of the borough that it is: (1) relatively small in nature; (2) it has a unique and mixed character which comprises a densely urban character to the south, and lower density suburbs and green spaces to the north;(3) approximately 27% of the borough is Green Belt or Metropolitan Open Land; (4) the population of the borough is rapidly expanding, and growing at a faster rate than the London and UK average; (5) the borough has a network of distinctive town, neighbourhood centres and high streets; and (6) the borough has a network of green and open spaces.	Support noted.
2618	Mr Tomasz Fiszer	WVRA Committee Member, Walthamstow Village Residents Association	We note that Walthamstow Village is the oldest part of present-day Walthamstow, which is captured in the designation of two conservation areas within the village: Orford Road Conservation Area and St Mary's Church Conservation Area. Its rich cultural heritage is reflected in the numerous listed buildings and monuments located within the area (Orford House Social Club, Old Town Hall, Vestry House, Squires Almshouses, The Ancient House, 10 Church Lane, The Chestnuts, St Mary's Churchyard Riggs Family	In response to this comment, it is proposed to include additional wording under Paragraph 2.5 to acknowledge the contribution to local heritage of all distinctive parts of the borough including Walthamstow Village. This will be cross-referenced to the area profile sections as described in Chapters 4-6 of the Plan.

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			Tomb, Parish Church of St Mary's, St Mary's Churchyard Wise Family Tomb, St Mary's Churchyard Solly Family Tomb, Unidentified Table Tomb, Walthamstow School for Girls) and a number of non- designated heritage assets that can be found there. Walthamstow Village should therefore be seen as crucial to preserving the borough's history and heritage (refer to par. 2.5 of the draft Local Plan).	

Chapter 3: Vision and Strategic Objectives				
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22	Mr Toby Nichols		Seems disingenuous. No point having a vision if you don't abide by your own vision. None of these treads should be used as an excuse for over development. See town square as an example. Allowing developers to build on public green space is unforgivable even if there are economic benefits. You need to have a golden thread to protect public and green space and ensure all new developments mandate green space/planted trees etc. else it does not go ahead. Sure build new housing if you must, but we do not want or need 29 story tower blocks or building on public space. When have I ever seen an increase in GPs for ANY development? Never. I do not believe everyone wants to live in a block of flats and there should be more choice. The plan should also aim to look after those people who don't want to live in a rabbit hutch. That means you don't build oversized developments on every scrap of land. You maintain green space and even create new pocket parks/roof gardens with any development. It should be mandated in the contract. I do not believe that Walthamstow needs to become like the city or Westfield/Olympic Park. If you want to live in that sort of place, go there. Walthamstow should of course give a diverse	The concerns expressed are noted. However, it is important to draw attention to the purposes of the vision. Developing a vision for the Local Plan involves looking ahead to what your area will be like in 15-20 years' time and translating this into objectives and policies as set out in the different sections of the plan. Policies in the plan seek to provide a range of housing types. The plan also includes policies to ensure the provision of infrastructure and the protection green spaces. The point about including a golden thread on the protection of public and green space and ensure all new developments mandate green space/planted trees etc is noted for consideration.

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			range of housing options, but these should be appropriate in size and scale to the existing environment.	
186	Miss Anna Misterska		I think that the overall golden threads are relevant, in particular those focusing on investment and infrastructure. However, it is important to caveat that delivery of your housing delivery goals cannot be done at the expense of existing residents and home owners. For example I am troubled by how the council uses council flat leaseholders to finance estate regeneration. I would also not support building of high-rise buildings in low-rise areas.	Policies in the plan seek to ensure a careful balance between several objectives including housing, employment, infrastructure etc. It is recognised that intensification could be associated with concerns about new development becoming inappropriate to their context. However, if well managed intensification could provide positive benefits to improve the quality of local environments. The plan contains a range of policies to guide the transformation of local areas, whilst also protecting local character. No change is proposed in response to this comment.
203	Ms Karen Hayes		I would like to see the issues surrounding loneliness explicitly identified at the strategic level and for the Council to commit to addressing the issues especially in the built environment. The issue is touched on in places, but not given the visibility that I believe it warrants. The government's strategy paper "A connected society A strategy for tackling loneliness - laying the foundations for change" stated: "This strategy calls on local authorities to consider how tackling loneliness can be embedded in their strategic planning and decision-making on the wellbeing of their communities." Loneliness and isolation are placing a exponentially increasing burden on already burdened social care budgets and if this can be addressed in any way by developments in the built environment this will be money well spent.	The Council recognises the need to address loneliness through a wide-ranging strategy that captures a variety of cross-departmental measures. With regard to the Local Plan, such influence can only come from good planning - involving innovative and sensitive approaches on the design and provision of good quality housing, provision of transport, public spaces, street furniture etc, ensuring that policies are designed to better enable all people, including older people to remain socially, physically and mentally active. The draft plan includes a range of policies addressing these matters. It is proposed to include a reference in the Local Plan to the Government's Strategy for addressing loneliness, also highlighting the role of the Local Plan in delivering the strategy.
382	Mrs Juliet Guinness		In the current political climate, these strategic objectives and vision will need reviewing regularly e.g. if a large percentage of the current EU citizens decide to return home following Brexit there may no longer be the same housing issues. Infrastructure is key to future development, Whipps Cross hospital in its	The plan will be monitored and reviewed periodically. Local planning authorities are now required to carry out five-yearly reviews of local plans. Accordingly, there will be opportunity to reconsider issues arising from Brexit. Policy 2 sets out the overarching policy on growth also addressing the infrastructure

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			current state is not fit for purpose, yet if the plan for the number of houses is realized before a new hospital has been developed where will people obtain their health care? If the land is sold off for housing where will new schools and surgeries be built to cater for the population? A balance must be reached.	issue. It seeks to ensure the provision of supporting physical, social and green infrastructure provision commensurate with the scale of growth. Planning permission will only be granted for new development if it can be demonstrated that there is, or will be, sufficient infrastructure capacity to support and meet growth requirements.
383	Mr Latiff and Singh		In principle the five GTs are supported, however, ecology/biodiversity, carbon reduction, wellbeing and good design seems to be missed off	Supported noted and comment will be taken into consideration.
396	Mr Tomasz Fiszler	WVRA Committee Member Walthamstow, Village Residents Association	As Walthamstow Village Residents' Association, we are disappointed by the minimal presence of Walthamstow Village in the draft London Borough of Waltham Forest Local Plan and the poor description and statements referring to Walthamstow Village and Ravenswood Industrial Estate.	Reference to 'Walthamstow Village' and indeed all other areas of the borough have been made in the plan. In particular, this is covered under section 6 of the Plan relating to Central Waltham Forest.
409	Mr Tom Clarke MRTPI	National Planning Adviser, Theatres Trust	We particularly welcome that carrying forward the borough's cultural legacy is one of the plan's five golden threads, which will hopefully build on the borough's period as London Borough of Culture.	Support noted.
416	Mrs Gillian Moran		Whilst appreciating this is a high level document, it is so wide open to mis-interpretation. Unless there are details on the what and how, it is very misleading. This appears to be how local authorities get to pass plans (called consultations!!!!) as the local population are in the dark. Although these points look wonderful. Without detail of how you will achieve this I cannot agree.	The Council is preparing an additional Local Plan document on site specific allocations. This will provide opportunity to apply the policies of the plan on specific sites, providing more details on how new developments could be integrated within existing local areas.
427	Mr P Heatherley		Only one job is to be created four FOUR households! So everyone is going to have to commute into London. The borough will become even more of a dormitory town desert with no trade for retain and local businesses. All the additional	Policies in the Plan seek to boost local employment to ensure a more balanced economy and minimise commuting. The plan also contains policies to ensure the provision of supporting infrastructure to support growth.

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			people will have to use the already inadequate bus and rail infrastructure and more gridlock on the roads.	
458	Mrs Krysia Sivyer		There is bound to be resistance to development of some areas but if this is presented correctly it can also be seen as an opportunity for regeneration. North Chingford Station Road really needs an injection of life for example and if additional housing built creatively and sensitively brings with it more community space and activities, this could be a positive outcome.	This comment is noted. The Council is preparing an additional Local Plan document on site specific allocations. This will provide opportunity to apply the policies of the plan on specific sites, providing more details on how new developments could be integrated within existing local areas.
473	Ms Alison Hill		I'm not sure liveable places are really being developed. Not many people would choose to live in high rise 'units' and density of these blocks is questionable. It is well known the effects of so many people living in one place is more prone to antisocial behaviour and other problems. Infrastructure is mentioned but how many extra GP surgeries are there going to be?	The plan contains a range of policies, which when adopted and implemented is expected to lead to the creation of liveable places. The plan would be monitored so there will be the opportunity for any unintended effects to be considered and necessary changes applied.
477	Mrs Sarah Sanders	Committee Member, DADRA	We feel it is very important to consider the individual and distinctive nature of the areas within the borough. As mentioned, the nature of the North of the borough is much quieter, and greener with its proximity to Epping Forest and the reservoirs, and this is something that should be maintained as a cultural legacy. The Sewardstone Road area has seemingly been dismissed as being of lesser cultural import than the main North Chingford area around Station Road and suggested as being more suitable for high-rise development - the DADRA Committee disagree strongly with this. The neighbourhoods around Sewardstone Road are some of the quietest residential areas of the borough, filled with the homes of young families and older adults. The area is looked over by historically and culturally significant locations including Pole Hill and Yates Meadow and looks on to the King George and William Girling	The draft Local Plan acknowledges the distinctive nature of the different parts of the borough and sets out a spatial approach that takes account of the unique character of local areas and the diverse communities. The Sewardstone Road area is within the subarea identified as North Chingford. Policy 21 of the plan seeks to "apply place-making principles that reflect the character and local distinctiveness of the area, particularly taking advantage of the heritage, cultural and green assets". This covers the point made and accordingly it is considered that no further change to this policy is required.

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			Reservoirs; to infill build to the extent proposed would dramatically change the distinctive role and nature of the area and the already precarious balance of the natural and built environment.	
527	Mr Roger Payne		Five Golden Threads, but no mention of the environment or pollution? I find that absolutely shocking. Presumably this plan was written prior to the council's declaration of a climate emergency. Well it needs to be changed now to include that perspective.	The draft plan makes reference to the "Climate Emergency" in Paragraph 4.28 and in particular Chapter 18 of the plan (Ensuring Climate Change Resilience). It is proposed to incorporate further changes as may be necessary to capture new initiatives arising from the Climate Emergency Action Plan.
531	Mr Peter Carey		I agree with the vision and strategic objectives	Statement of support noted.
535	Mr Roger Brown	Chair, Love North Chingford	There is little guarantee that development will be appropriate, well designed, well located or to scale in this historic town centre, next to an internationally important open space. There appears little ambition to actively support a neglected retail centre, develop local distinctiveness, enhance heritage assets, cultural offer, the unique village atmosphere and tourism potential.	Chapter 20 of the draft plan provides information on how the policies on the plan would be implemented. This will mainly be through the planning applications process. In accordance with national policy, planning applications must be determined in accordance with policies in an adopted Local Plan.
536	Mr Roger Brown	Chair, Love North Chingford	Too little local information to signpost development intentions of the Council here, or offer guidance for developers, when all know that substantial intensification is planned at our key town centre sites. In the absence of a promised SPD, LNC are not confident adequate detail and safeguards will be forthcoming in documents flowing from the plan or AIP, as is the case in the current plan. The Draft is big on aspiration but lacks local detail, local distinctiveness and the community needs.	The Council is preparing an additional Local Plan document on site specific allocations. This will provide opportunity to apply the policies of the plan on specific sites, providing more details on how new developments could be integrated within existing local areas.
584	Mr Len Banister		Disappointment in the aspirational quality of the Draft Local Plan. Annoyance at Council's response after volunteers have spent hours preparing a local response which has not been used to inform the draft which was originally sold as a method of	The draft Local Plan has a borough-wide strategic focus to be supported by supplementary planning documents, master plans for identified local areas. The Council recognises the supporting role of neighbourhood plans such as that being prepared by the Highams Park Planning Group. The Council is preparing an

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			involving the community. Procedure lacks detail which would enable any meaningful comments.	additional Local Plan document on site specific allocations. This will provide opportunity to apply the policies of the plan on specific sites, providing more details on how new developments could be integrated within existing local areas.
773	LVRPA	Lee Valley Regional Park Authority	The Vision statement acknowledges the Lee Valley Regional Park as part of its leisure and recreation offer. It would be helpful if under the Vision statement section 'Waltham Forest as a Place of Leisure' (page 12), the importance to the borough of the Authority's diverse visitor facilities could also highlighted, for example the Lee Valley Ice Centre and the Lee Valley Riding Centre.	The Council notes this point. It is proposed to include suitable wording to acknowledge the importance of the LVRPA assets within the borough, including the Lee Valley Ice Centre and the Lee Valley Riding Centre.
779	LVRPA	Lee Valley Regional Park Authority	The Authority previously highlighted the important contribution of its venues (as well as the parklands) to the borough's leisure needs. They form part of the offer promoted by the Council's Vision: 'Waltham Forest as a place of leisure' and will be part of the borough's cultural legacy following its 2019 status as the London Borough of Culture.	This point is noted. It is proposed to make reference to the LVRPA assets/leisure facilities in the vision statement.
816	Freight Transport Association		FTA is supportive of many of the strategic objectives in the London Borough of Waltham Forest's Local Plan, including sustainable growth, supporting infrastructure, driving investment and promoting the economy.	The Council notes the statement of support provided by the FTA.
880	Lauren Keeling	Planning Officer, Essex County Council	Vision . ECC notes that the Draft Local Plan states that "the borough will maximise the advantages of its access to the most economically vibrant parts of London and its position in the UK Innovation Corridor (London-Stansted-Cambridge) to grow its own creative and cultural economy" (page 11). This statement of intent as set out within the 'vision' is welcomed and it is agreed that this is important for the London and Essex economy	The Council notes the statement of support provided by ECC on this point.
881	Lauren Keeling	Planning Officer, Essex County Council	It is disappointing that the Draft Local Plan makes no further reference to how the LBWF is seeking to achieve this vision statement. It does not highlight that LBWF has considered how the surface access connectivity for local residents to the UK	The achievement of the vision statement is being delivered through the strategic objectives, policies and proposals of the plan. The point made about surface access connectivity including the M25, and M11, as well as the Central Line and the

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			Innovation Corridor will be strengthened or supported. ECC would anticipate that the Draft Local Plan refers to specific surface access proposals including the M25, and M11, as well as the Central Line and the West Anglian Mainline. ECC consider that residents located within the LBWF do and may seek to access existing and future employment opportunities within the UK Innovation Corridor, notably Harlow and London Stansted Airport.	West Anglian Mainline is noted. However, Waltham Forest Council has no direct influence on these proposals, other than working in partnerships with other Local Authorities, Highways England, TfL and other transport infrastructure bodies to lobby and influence outcomes. In this regard, the Council can only support the aspirations of the LSCC in promoting the UK Innovation Corridor and in delivering good outcomes for the sub region. Strategic Objective 2 makes reference to the UK Innovation Corridor.
882	Lauren Keeling	Planning Officer, Essex County Council	Strategic Objectives. Given the importance of the UK Innovation Corridor it is recommended that the strategic objectives include reference to connectivity to locations outside of the LBWF and include reference to links with Harlow, London Stansted Airport and Cambridge.	This point is noted. It is proposed to amend Strategic Objective 8 to also make reference to the connectivity of the borough to neighbouring areas/locations.
901	Mr Mathew Frith		Waltham Forest in 2025 Waltham Forest as a place of leisure; We support this, as long as the biodiversity of the borough's 'green and blue assets' is effectively sustained and enhanced for its intrinsic worth.	This is noted. The plan contains policies to manage the impact of leisure uses on the natural environment including biodiversity. See Policies 4 (H) and 86.
902	Mr Mathew Frith		Strategic Objectives We welcome and support strategic objectives 11 and 12 in principle. However, we recommend that 11 requires strengthening along the lines of "Protect, restore and enhance the borough's natural environment to sustain habitats and species of conservation importance, and develop a multi-functional network of green and blue infrastructure to deliver benefits for all, including, where appropriate, increased public access." (see comments under Section 17).	This point is noted. It is proposed to amend Strategic Objective 11 to also refer to habitats and species. However, mindful of the practical challenges associated with the restoration of natural environment, the suggested wording of this objective cannot be accepted.
963	The City of London	The Conservator's of Epping Forest	The borough should provide a more balanced vision by including the protection and enhancement of Epping Forest as a whole as a core aim of the Local Plan's Vision and Strategy. Small strategic changes within the 'Liveable Waltham Forest' strand (see page 13) and Strategic Objective 11 - 'Enhance the natural environment' - would offer a positive and counter-	This point is noted. It is proposed to include suitable wording in both the vision statement and Strategic Objective 11 to also make specific reference to the protection and enhancement of Epping Forest.

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			balancing objective. More detail is given below under Strategic Objective 11 (Section 17 of the Document).	
1048	Ms Alison Blom-Cooper	Planning Department, Epping Forest District Council	It would be helpful to include some reference to the protection of the natural environment.	This pointed is noted. It is proposed to make specific reference to protection of the natural environment in both the vision statement and the strategic objectives.
1091	Milena Petrovic	Sustainable Development Officer, Thames Team Natural England	Natural England advises that the Plan's vision and emerging development strategy should address impacts on and opportunities for the natural environment and set out the environmental ambition for the plan area. We suggest creating a stronger environmental focus within the Five Golden Threads of the Vision and Strategic Objectives of the plan. This could be done through the creation of a new 'Golden Thread' focusing on the creation of a healthy, connected biodiverse environment with well-planned and maintained green infrastructure that would benefit both wildlife, people and potentially provide climate change resilience. Alternatively, the environment could be highlighted as a cross-cutting theme across the Golden Threads, or added to one of the existing 'Golden Threads' to include specific wording relating to the environment.	<p>This pointed is noted. It is proposed to make specific reference to protection of the natural environment in both the vision statement and the strategic objectives.</p> <p>It is proposed to include a further golden thread focusing on the creation of a healthy, connected biodiverse environment with well-planned and maintained green infrastructure.</p>
1116	Stagecoach		Stagecoach support the overarching vision for the borough, as outlined within Chapter 3, in addition to the strategic objectives which include, inter alia, the need to ensure a significant increase in the supply, choice and mix of high quality new homes and the need to grow, promote and diversify Waltham Forest's economy.	The Council notes the statement of support provided.
1203	Rosie Sterry	Transport for London - Commercial Development	We broadly support the vision and strategic objectives set out in this section. However, we believe that the vision, golden threads and objectives should clearly identify that new development should be optimised on land which has high levels	The golden threads make reference to land optimisation, which implies the need to make efficient use of land, prioritising land with high levels of public transport accessibility. This principle is

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			of public transport accessibility in line with the National Planning Policy Framework (NPPF) paragraphs 108 and 118d and DLP Policies H1, D1 and D8.	reflected in the plan document through a number of policies. Accordingly, no further change is considered necessary.
1204	Rosie Sterry	Transport for London - Commercial Development	While it is welcome that the borough identifies that a strategic objective is to “ensure a significant increase in the supply, choice and mix of high quality new homes, in particular delivering genuinely affordable homes to enable and encourage residents to stay in the borough and strengthen communities”, the objective should be clearer that these homes will be provided in accessible locations in line with the policies listed above.	The plan strategy seeks to direct growth to most sustainable locations - with good transport facilities and existing supporting services and infrastructure.
1205	Rosie Sterry	Transport for London - Commercial Development	Further to this, the strategic objectives should also reference the Mayor of London's Transport Strategy, which includes a target for “80 per cent of trips will be made on foot, by cycle or using public transport by 2041”. Ensuring that development is optimised in the most accessible locations will significantly help to reduce the need for car trips and this should be reflected within the vision and strategic objectives for the draft Local Plan.	The draft plan makes reference to the Mayor's Transport Strategy. Strategic objective 8 of the draft plan makes reference to the need to improve active and sustainable transport choices across the borough and beyond building on the success of the 'Enjoy Waltham Forest programme'. In the Council's view, this seeks to apply the aspirations of the Mayor's Transport Strategy without necessarily repeating the same objectives of that strategy. Accordingly, no further change is considered necessary.
1265	Josephine Vos	Transport for London - City Planning	We welcome the inclusion of ‘safer cleaner streets’ as one of the overarching priorities and the five golden threads, including infrastructure.	The Council notes the statement of support provided.
1266	Josephine Vos	Transport for London - City Planning	We also welcome the approach to create ‘liveable neighbourhoods’ for Waltham Forest residents and the importance placed on improvements to walking and cycling environments to achieve this.	The Council notes the statement of support provided.
1267	Josephine Vos	Transport for London - City Planning	We strongly support the approach to car parking, particularly requiring car-free development in the south and central parts of the borough.	The Council notes the statement of support provided.

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1269	Josephine Vos	Transport for London- City Planning	We welcome strategic objectives, though we would suggest objective 8 should refer to public transport improvements as well as walking and cycling routes.	This point is noted. It is proposed to amend Strategic Objective 8 to make reference to improvements to public transport, walking and cycling routes.
1338	Bryce Tudball	London Borough of Haringey	Haringey broadly supports the objectives of Waltham Forest's Draft Local Plan. We note that the growth strategy proposed in the Draft Local Plan is based on the "Option 5 - Combined Approach" identified in Waltham Forest's Direction of Travel document 2017. In line with our response to the Direction of Travel document, we support this approach.	The Council notes the statement of support provided by LB Haringey regarding the plan vision and objectives.
1347	Claire Laurence	London Borough of Newham	LBN are supportive of the ambitious housing and employment targets identified and movements towards improving connectivity, particularly in the south of the borough and towards the southern growth zone. The connectivity objectives align with Newham Local Plan's own aspirations to improve connectivity between Stratford and Waltham Forest to the north (as illustrated in Figure 2.1 of the Newham Local Plan 2018).	The Council notes LBN's statement of support regarding the ambitious plan targets on housing, employment and the plan aspirations towards improving connectivity in the south of the borough.
1465	Ms Hanna Chalmers		Most Londoners and people living in Highams Park understand the need for more housing - there are opportunities as outlined in this letter from the HPPG to build more housing without losing the distinct assets and local character of the area that we have here and the one civic space we have in Highams Park - the purpose built, recently refurbished and incredibly well utilised library.	The Council's response to the HPPG letter is recorded and referenced under HPPG (Gordon Turpin). The concern raised about the impact of growth on local character is recognised - in particular that new development could become inappropriate to the existing local context. The plan contains policies to ensure redevelopment is well managed. It contains a range of policies to guide growth and transformation of local areas to ensure that new development is carried out in harmony with its setting and makes a positive contribution to the local environment. Policy 55 of the draft Plan seeks to protect existing social infrastructure uses, including libraries.
1522	Ms Mary Manuel		The draft plan recognises the role planning can have on the health and wellbeing of individuals and communities and we support the approach taken recognising that good design, liveable neighbourhoods and creating safe and accessible places	The Council notes the statement of support provided on the approach taken regarding good design, liveable neighbourhoods, creating safe and accessible places and health and well-being.

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			can support good mental and physical mental health and minimise adverse impacts	
1534	Mark Furnish	Sport England	Sport England is surprised that health and wellbeing is not included within the golden threads given that the Waltham Forest in 2035 vision section seeks for the borough's residents to have healthy and active lifestyles, have a network of green spaces, open spaces and parks and be London's top location for recreation. Similarly, the Strategic Objectives seek to improve quality of life and well-being and health for all, improve active travel and ensure there is a network of green and blue infrastructure that benefits all. These themes appear throughout the plan and do reflect the aspirations of the London Plan to create a healthy city.	The golden threads relate to higher level broad cross-cutting principles underpinning the thrust of policies in the plan. It does not seek to capture all themes, but this point is noted for consideration.
1559	Mr Tim Madelin	Associate Director of Estates (Strategic), NHS North East London Commissioning Alliance	The draft plan recognises the role planning can have on the health and wellbeing of individuals and communities and we support the approach taken recognising that good design, liveable neighbourhoods and creating safe and accessible places can support good mental and physical health and minimise adverse impacts.	The Council notes the statement of support provided on the approach taken regarding good design, liveable neighbourhoods, creating safe and accessible places and health and wellbeing.
1592	Bob Bennet		It is noted that the 12 strategic objectives do not make specific reference to equality issues, is that a deliberate admission?	Equality is a cross-cutting issue. A separate technical process will be applied to test all plan policies and proposals for equality impacts and where necessary apply necessary mitigation measures.
1678	David Thompson	The Manager, RVL Holdings PLC	RVL welcome the borough's strategic objectives, and commitments to ensure a significant increase in the supply of new homes, whilst growing, promoting and diversifying Waltham Forest's economy.	This comment has been noted and the Council notes the statement of support provided by RVL Holdings PLC on the plan vision and objectives.

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1679	David Thompson	The Manager, RVL Holdings PLC	The objective of improving life chances by improving job opportunities, upskilling residents and providing access to new skills and training opportunities is also supported.	Expression of support for this strategic objective is noted. No further change required.
1718	Wanis Ltd	Wanis Ltd	Overall, Wanis strongly supports the jobs and housing growth ambitions at the heart of the draft Local Plan, with the Lea Bridge area identified as a strategic location within which accelerated, high quality growth can be delivered.	The Council notes the statement of support provided by Wanis Ltd on the plan vision and objectives.
1719	Wanis Ltd	Wanis Ltd	As an established business employing many residents from the local area, Wanis strongly supports the regeneration aspirations for the Lea Bridge area. There is a real opportunity to build on the area's inherent strengths and recent infrastructure investment and create a new sustainable neighbourhood that provides local houses and local jobs for local people.	Noted. Support welcomed.
1806	Robert Tatam		There are, on the one hand, a number of examples showing a cut-and-paste approach has been taken to provide generic Priorities, Guiding Principles, 'Golden Threads', and draft Local Plans - that may have been provided to several authorities (perhaps even with the same typing mistakes), and, on the other hand, two glaring examples that Waltham-Forest-specific statements have been inserted without any exploration of their implications or the inconsistencies with the policies put forward. The first example has already been brought to your attention - the statement that Highams Park has a Neighbourhood Development Plan, without any exploration in the relevant Area sections of how the strong and detailed provisions in the Neighbourhood Development Plan, with its nine distinct areas, can or cannot be reconciled with the proposals and assertions in the draft Local Plan.	The draft Local Plan has a borough-wide strategic focus to be supported by supplementary planning documents and masterplans for identified local areas. The Council recognises the supporting role of neighbourhood plans such as that being prepared by the Highams Park Planning Group. However, in accordance with national planning policy, a neighbourhood plan must be in conformity with the Local Plan, delivering the strategic aspirations of the Local Plan set at higher level. The Council has declared its commitment to work with the Highams Park Planning Group to ensure a good relationship between both plans.
1848	Mike Chrimes		There is also reference to a London Stansted Cambridge corridor, but it is difficult to see from the documentation presented that this meaningfully can affect LBWF unless it expands its Higher education sector, which is not mentioned.	The draft plan rightly acknowledges the borough's locational relationship within the UK Innovation Corridor (London-Stansted-Cambridge Corridor) and seeks to maximise the advantages arising from of its connectivity in different ways,

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				not just in the education section, but in transport, industry etc.
1849	Mike Chrimes		References are made to the digital economy but no indication is given of its current scale and potential for growth in the borough.	Further information about the digital economy is provided under the substantive policies of the plan dealing with this issue. In particular, policies 42 (creative enterprise zone) and 76 (digital infrastructure) and Chapter 15 generally (transport and utilities).
1946	Tony Thorne		Ensure that plans are sustainable and will meet the demands of all sectors of the population and provide an environment where all can live in healthy and safe conditions with access to all the public services without the need to travel vast distances.	The draft Plan addresses the stated objectives through the range of policies included in the document.
1947	Tony Thorne		Recognise the needs of specialist sectors of the communities such as mothers with young children, the disabled and the elderly avoiding discrimination.	The draft plan contains references to the stated objectives with regard to 'access for all' requirements. For better emphasis and clarity, it is proposed to include a substantive policy on 'Access for All'.
1949	Steve Lowe		Right from the off, under the "Strategic Objective" heading there is no mention of public transport. Rather the focus seems to be solely and wholly on walking and cycling. Is the Council not really interested in promoting and increasing the huge contribution that public transport already makes to sustainable travel in, from and to the borough? Unfortunately (in my view), in seeming to go all-out to improve cycling facilities the Council has made bus services worse. This is by (for example) removing bus lanes in Lea Bridge Road so that buses can't pass congested traffic any more (probably a reason for TfL's taking off the 48 route), and implementing so many road closures that the resulting congestion has (as TfL has stated) forced a reduction in the W12 service's frequency. Bus reliability is the Council's measure (in the LIP) for monitoring the quality of bus services in the borough. TfL's data show that reliability has deteriorated - and especially where the Council's interventions through Mini-	Strategic Objective 8 makes reference to sustainable transport choices, which includes public transport. Chapter 15 of the plan includes a range of policies promoting the use of public transport, in particular, Policy 69.

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			Holland have been most intense. TfL's data also show that reductions in passenger numbers are most marked (such as 16% on the W12 in the last year) where routes have been worst impacted by the Council's Mini-Holland interventions.	
1976	Ms Rosa Ruggieri		I agree with improving the area for the right reasons; but not increasing the flow of traffic causing air pollution leading to health issues in the long run and then putting pressure on an already stretched NHS Service, because the borough needs to raise money to pay consultants to write a plan.	The Local Plan contains policies to manage the impact of growth including traffic and congestion (Chapter 15), air pollution, health and wellbeing (Chapter 13).
2022	Mrs Sharon Henry		In conclusion, local plans MUST be made clear to all those who will be affected. At the moment, we feel that we are being crammed in by the constant building of new homes in our areas without any consideration to how we are all going to live here.	It is recognised that intensification could be associated with 'town cramming' and concerns about new development becoming inappropriate to their context and destroying much of what people see as valuable in their daily living environments. However, if well managed intensification could provide positive benefits to improve the quality of local environments. The plan contains a range of policies to guide the transformation of local areas, whilst also protecting green spaces and providing supporting infrastructure.
2041	Stonecrest Marble Ltd	Stonecrest Marble Ltd	Our client supports the vision and strategic objectives as set out within Chapter 3 of the Draft Local Plan.	The Council notes the statement of support provided on the plan vision and objectives.
2042	Stonecrest Marble Ltd	Stonecrest Marble Ltd	In particular, our client recognises and supports the need to grow a creative, diverse and resilient economy, and supports the Local Plan's aim to promote the economy in order to improve life chances of the residents of Waltham Forest.	The Council notes the statement of support provided on the plan objective to grow a creative, diverse and resilient economy and to improve life chances of Waltham Forest residents.
2043	Stonecrest Marble Ltd	Stonecrest Marble Ltd	This representation broadly supports the Spatial Strategy of the Local Plan and its commitment to delivering sustainable residential and economic growth during the plan period. However, objections are raised to the plan due its lack of clarity regarding how and where growth will be delivered, and its lack of direction regarding Green Belt release.	Noted. Support welcomed. The Local Plan does not allocate sites as this will be the subject of a Sites Allocation document which will be consulted in Autumn 2020. The library is not affected by either document.

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2044	Stonecrest Marble Ltd	Stonecrest Marble Ltd	We would refer to the LB Waltham Forest Employment Land Study Report, dated May 2016, which in summary considers there to be a need for 2,750 additional Full Time Employment (FTE) jobs during the plan period, and a need to accommodate an additional c.19,000sqm of office floorspace. This would require an indicative land provision of between 7.2ha and 10.6ha, c.10,000sqm of industrial space and 28,000sqm of warehouse space.	The draft plan seeks to plan for the identified level of need for employment provision as indicated by the Employment Land Study 2019.
2046	Stonecrest Marble Ltd	Stonecrest Marble Ltd	With regards the clients site, and as set out within Chapter 6 of this representation, this site is available now for development in order to provide either residential development, or as per the current application before officers, a highly attractive and sustainable commercial development, taking advantage of the sites location adjacent to an existing Strategic Industrial Location and the North Circular Road.	It is noted that this point relates to a site-specific matter, best considered through a planning application.
2172	Capital and Regional Plc	Capital and Regional Plc	Our client is the freeholder of The Mall Walthamstow, 45 Selborne Road, Walthamstow, London E17 7JR ('the Site'). The Site has an extant planning permission, granted July 2018 (Ref: 171355)..... Our client therefore has a keen interest in the direction of emerging Local Plan policy, as well as LBWF's objectives for town centre development within the borough. In short, we are generally supportive of the policies within the Draft Local Plan and LBWF's wider vision for the borough. We set out below our comments relating to specific policies within the Draft Local Plan.	Support noted.
2173	Capital and Regional Plc	Capital and Regional Plc	We are generally in agreement with the strategic objectives set out in the Draft Local Plan, which seek to deliver a vision for the borough which we endorse. However, we would recommend the inclusion of an objective which seeks to continue to support the economic growth of Walthamstow Town Centre. Walthamstow represents the only Major Town Centre within the borough (as designated by the London Plan) and as such,	The Council notes the suggested inclusion of an objective to support the economic growth of Walthamstow Town Centre. Strategic Objective 4 seeks to support Waltham Forest's network of thriving, safe and attractive town centres including Walthamstow Town Centre. Furthermore, policy 47 specifically mentions Walthamstow Town Centre as a Major Centre and the

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Chapter 3: Vision and Strategic Objectives				
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			this should be reflected in the strategic objectives for the borough.	borough's principal and economic hub. Accordingly, no further change is necessary.
2210	Lucy Read	Planning Advisor, Sustainable Places Environment Agency	Pleased that 11 of the 12 strategic priorities are focussed on the natural environment, but they have not been reflected in the five golden threads. Supportive of use of previously developed land and are pleased to see sites will be allocated using the Brownfield Land register.	This point is noted. It is proposed to include a further golden thread to acknowledge the importance of natural environment and its protection.
2340	The Arch Company		Overall, and as set out above, The Arch Company is supportive of the direction of the Draft Local Plan and relevant emerging policies contained within it, particularly where they relate to South Waltham Forest and the South Leytonstone Strategic Location, respectively (Chapter 5), as well as the principle of co-location within BEA sites where this can assist in the delivery of a truly mixed use development capable of providing much-needed housing for the borough. Our client is also supportive of the flexibility provided through the wording contained in Draft Policy 44 in relation to new development in and/or the re-purposing of railway arches across LB Waltham Forest which is particularly relevant to their land holdings. It is further considered that the vision and policies contained in the Draft Local Plan have the potential to meet the Council's ambitions of delivering good, sustainable growth in the borough during the plan period up to 2035. Our client and we are looking forward to continuing our positive and pro-active discussions with LB Waltham Forest to assist the Council in preparing a sound and deliverable New Local Plan, and to bring forward new development across their portfolio.	The Council notes the statement of support provided.
2617	Mr Tomasz Fiszer	WVRA Committee Member	One of the Five Golden Threads identified in the Vision and Strategic Objectives of the draft Local Plan: "Building on the unique strengths of the borough and carrying forward its	The golden threads refer to broad principles applicable throughout the plan. It would be inappropriate to specifically

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		Walthamstow Village Residents Association	cultural legacy”, certainly applies to the heritage of Walthamstow Village.	make reference to 'Walthamstow Village' or indeed any other parts of the borough in this section.
2619	Mrs Sarah Sanders	Committee Member, DADRA	We understand that partnerships with developers will be required to enact the level of development required, but we urge the council to ensure their accountability for timely action. At the intersection of Sewardstone Road and Kings Head Hill a number of homes and businesses received compulsory purchase orders for development only for the site to now lay dormant as the plans for redevelopment stalled. We must ensure this type of land-holding is not allowed to expand to the entire area as it is damaging to the infrastructure required for a thriving community centre.	The Council will continue to work with developers to implement development proposals. The implementation section of the plan (Section 20) sets out the policy measures that will apply. This particular case will be investigated.
2620	Mrs Sarah Sanders	Committee Member, DADRA	Regarding strategic objective 8, whilst the DADRA committee support these aims, we are realistic that with an older resident population in the Sewardstone Road area and the topography of the surrounding area walking and cycling solutions will not be suitable for all. Consideration needs to be taken for less active and able populations.	This point is noted. Policy 67 seeks to create liveable neighbourhoods for all. The policy seeks to reduce the dominance of the motor car and increase the number of trips made by walking, cycling and public transport, which is expected to improve transport conditions for less active and able populations. No further change is proposed in response to this comment.
2955	London and Quadrant (L&Q)	Director	Paragraph 11 of the National Planning Policy Framework (NPPF, February 2019) requires all Local Plans to be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally. Paragraph 31 of the NPPF states that the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies. Paragraph 57 of the NPPF requires careful consideration of viability and costs. Plans should be deliverable, and the sites and scale of development identified in the plan	The Council notes the NPPF requirements mentioned. The final version of the plan will be supported with a whole plan viability assessment. This will provide economic viability evidence in respect of the cumulative impact of the emerging Local Plan policies.

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			should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened.	
2956	London and Quadrant (L&Q)	Director	LBWF needs to ensure that any planning obligations or policy requirements detailed in the DLP have been developed on an evidentiary and tested basis (and this evidence made publicly available) to ensure they can be delivered without impacting the viability of proposals.	The plan will be supported with evidence on whole plan viability.
2957	London and Quadrant (L&Q)	Director	Flexibility should also be introduced where obligations and policy requirements can be reviewed or revised where a tested viability appraisal demonstrates they should or where other benefits of a development may outweigh the benefit of an obligations or policy requirement.	Plan policies will be monitored through the preparation of the Authority Monitoring Report to be published annually.
2960	London and Quadrant (L&Q)	Director	Care also needs to be taken to ensure that any new draft policies do not undermine the positive development approaches and objectives contained within the existing DLP, such as the Wood Street Area Action Plan. This document has and continues to guide the planning of development proposals in the pipeline and may be adversely impacted by proposed changes in the DLP which could change key development elements with regarding site allocations and requirements, with costly implications for existing plans, that may stop development entirely.	The Wood Street Area Action Plan was prepared as a consultation draft version in 2013. It was not adopted and therefore not part the Council's development plan. Policies in this plan have no weight in considering development proposals. The Council is preparing a separate development plan document on site allocations. As part of this work, other undeveloped sites previously included in the draft Wood Street Area Action Plan will be reviewed.

Chapter 4: Waltham Forest's Spatial Strategy				
ID	Full Name	Organisation	Comment	Council (Officers) Response
20	Ms Abigail Woodman		'Sustainable development' does not appear to be specifically defined but it appears to be interpreted narrowly as development that will deliver long-term growth to all residents. That is very far from my understanding of the term. To me	The concept of sustainable development can be interpreted in many different ways, but at its core is an approach to development that looks to balance different, and often competing needs against an awareness of the environmental,

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			'sustainable development' is all about putting the environment first, ensuring that development supports the protection and enhancement of the natural world and, where this comes into conflict with out-and-out growth, putting the environment before growth. Given that the Council has declared a climate emergency, I would like to see it define sustainable development more clearly, in a way that puts protecting our environment and minimising the effects of man-made climate change first.	social and economic limitations faced by society. The plan seeks to balance these different requirements. It certainly acknowledges the current climate emergency and includes a separate chapter on this issue. See Chapter 18.
23	Mr Toby Nichols		Again makes all the right noises, but past track record proves otherwise. Take Wood Street as an example. Take a street that wins an award, and then ruin it by building on the square and kids' playground. How does that make your strategy believable? Any new development must provide a) homes (obviously) b) retail, c) jobs, d) green space e) schools/GPs etc. These should all be within walking distance of the development else they should NOT go ahead. You talk about making liveable neighbourhoods so we don't have to drive, therefore you need to have all these things close by. This may clearly mean smaller scale developments. Something has to give. You can't build the density being asked for in policy 2 and have policies 1,2,4 and 5. They are conflicting objectives and objective 2 should always lose.	It is considered that there are no conflicting objectives. In practice, planning is all about balancing different and often competing needs.
57	Mr David Matson		Waltham Forest's Spatial Strategy (Policy 2): The draft London Plan is intrinsic to the draft Local Plan. The London Plan seeks an increase in housing completions across LBWF from 700pa to 1800 units pa in the plan period (para.10.5 herewith). The number of housing units required drives the thrust of policy and future development in the Local Plan. It will also bring the prospect of unprecedented disruption and dislocation for existing residents. And so, the case for this scale of development must be clear-cut, and well presented. However, there are technical issues with the London Plan projections,	Paragraph 4.6 of the plan document provides the context and explanation for the scale of growth proposed. As stated, the amount of growth necessary to ensure that Waltham Forest caters for the objectively assessed needs of current and future residents and businesses up to 2035 has been established from London Plan targets and through other evidence-base studies, including the Growth Capacity Study 2019, the Characterisation and Intensification Study 2019 and the Employment Land study (2019). These studies are all published on the Council's website.

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			<p>leading to uncertainty about the need of development on the suggested scale. - The London Plan acknowledges that collaboration with authorities in the wider South East on accommodating population and household growth is not yet in place (Policy SD2, page 45 onwards). The possibilities of further housing provision in the wider South East has not yet been fully considered. - The London Plan acknowledges that it uses an outdated methodology for calculating housing need (para. 0.0.14A). The implications of a new assessment are not considered in the text. These points are not drawn together in the text of the draft Local Plan itself. It would be appropriate to do so, together with any information about the timing of any possible changes. Currently, Policy 2 reads like an assertion that this scale of development is required, without clear justification. As such it is likely to provoke resistance. Why should residents be content with a fait accompli without full explanation?</p>	
380	Mrs Juliet Guinness		<p>Very concerned about the intensification element, we need to take into account one of Waltham Forest's biggest assets, that being a green 'Forest' borough, the ecological climate will suffer from overbuilding, no matter how many roads become pedestrianized or cars banned.</p>	<p>The Council notes the concern expressed about the policy on intensification and its likely implications. However, if well managed, intensification could provide positive benefits to improve the quality of local environments. The plan contains a range of policies to guide the transformation of local areas and to manage the implications on climate, transport, the protection of green spaces etc.</p>
384	Mr Latiff and Singh		<p>There is a need to comprehensively review the Green Belt boundary and to identify sites that would help support the Council's objectives in developing Policy 3 and Policy 4 that are within the Green Belt. An example of where sustainable growth could be accommodated is land at Folly Lane (Banbury Reservoir [see call for sites ID:1]) where employment land could be made available.</p>	<p>The Council has carried out a Green Belt/MOL Study. This document is published on the Council's website. The Council's position on the de-designation of Green Belt/ MOL areas (where justified) will be clarified in the next iteration of the Plan - the Proposed Submission version.</p>

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417	Mr. David Matson		<p>I have read recently released draft 'area investment plan' documentation, and understand that consultation will take place next year. I welcome this as a potential method of informing and reassuring local residents of prospective change. However, at the moment, there seems to be a disconnect between the site specific approach of 'Opportunity Sites', and wider objectives for the area ('The gateway to Epping Forest', 'Destination for a diverse and high quality visitor, leisure, food and beverage offer'). The stated intention is to tackle these issues by way of a 'Neighbourhood Action Plan'. However, we need to ensure that this document creates a vision and a strategy for the area endorsed by public consultation. Without an agreed vision and strategy, there is a danger that individual sites will be developed out of context, to attain housing or employment targets, but not in line with public expectations. Early and continuing public consultation will also be critical for 'Gamechangers' such as the Assembly Hall and Library. But above all, agreement on vision and strategy is the most likely method of ensuring public and private expenditure is well spent, and on the priorities of local people.</p>	<p>The Area Investment plan does not form part of the Local Plan as it was produced as an internal discussion document. At Local Plan level, the Council is preparing an additional Local Plan document on site specific allocations which will be consulted upon later in 2020. This will allow opportunity for local views to influence the outcome of proposals.</p>
474	Ms Alison Hill		<p>I understand the general idea of having hubs of development but intensification can be overdone and cause more problems. Enabling healthier lifestyles sounds good but I'd like to know how. Will there be adaptable flats for more elderly/less mobile residents or lifetime homes? Is there really going to be a broad range of housing? I can't see that as the case in what has gone up so far. Successful neighbourhood communities will only happen if there is a mix of housing types and sizes, green space (for hanging out laundry, meeting together, growing plants and even mini allotments), plenty of GPs and schools, good transport links. Protecting and enhancing green and blue areas - enhancing is fine for sports fields etc but we also have to allow natural environments to be wild.</p>	<p>The Council notes the concern expressed about the policy on intensification and its likely implications. However, if well managed intensification could provide positive benefits to improve the quality of local environments. The plan contains a range of policies to guide the transformation of local areas and to manage the implications on climate, transport, the protection of green spaces etc. Chapter 13 of the plan sets out the detailed policies on how the Council intends to promote health and well-being. This covers a number of policy initiatives including encouraging active and sustainable travel through walking, cycling and working with partners (NHS, schools and community groups) to support the provision of new and improved healthcare facilities, mitigating pollution etc.</p>

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				Chapter 8 of the plan also sets detailed policies on housing. As you will note this includes lifetime homes and the delivery of a range housing types and tenures. Chapter 17 of the plan also sets out detailed policies on the protection and enhancement of the natural environment.
529	Mr Richard Dobbs		Dreadful this will massively over develop the borough. The amount and style of the new builds are stripping the culture of the borough. The whole area is being gentrified. Services - buses, trains, doctors, schools - cannot support this level of development.	The Council notes the concern expressed about the policy on intensification and its likely implications. However, if well managed intensification could provide positive benefits to improve the quality of local environments. The plan contains a range of policies to guide the transformation of local areas and to manage the infrastructure implications. The Local Plan will be supported by an Infrastructure Delivery Plan, which will set out details of the borough's infrastructure requirements. This document will set out what is needed, where it is needed and when it is needed. This document will be published with the final version of the plan.
597	Anthony Thorne		The plan and the commentary of the council's officers seem to emphasise the wish to 'intensify' the population of the borough. It would seem that little research and consideration has been given to history.	It is recognised that intensification could be associated with 'town cramming' and concerns about new development becoming inappropriate to their context and local history. However, if well managed intensification could provide positive benefits to improve the quality of local environments. The plan contains a range of policies to guide the transformation of local areas, whilst also protecting local character.
607	Anthony Thorne		Recognise the needs of specialist sectors of the communities such as mothers with young children, the disabled and the elderly avoiding discrimination.	This point is noted. It is proposed to include a separate policy on 'access for all' recognising the needs of vulnerable people and ensuring that development proposals do not result in adverse conditions for some community groups. The final version plan of the plan will be supported by an Equality Impact Assessment.
608	Anthony Thorne		Ensure that plans are sustainable and will meet the demands of all sectors of the population and provide an environment where all can live in healthy and safe conditions with access to all the public services without the need to travel vast distances.	This point is noted. The plan contains a range of policies promoting the development of sustainable communities. In particular, these are covered under the thematic policies of the

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				plan, covering the provision of social and community Infrastructure, health and well-being, sustainable transport, etc.
640	Mr Gordon Turpin	Highams Park Planning Group	Most of the development in the plan period should be centred in the District Centre and through re-modelling of the Aldriche Way Estate.	This is noted for consideration.
718	Mr Gordon Turpin		Why are 'sites' in Highams Park already identified by the Council for development (as advised at the meeting in April) not included in an updated Brownfield Register or other consultation documents at this stage of the consultation process.	Sites listed through Brownfield Land Register reflect current position at the time of publication. The intention is to review this annually. The Council is preparing an additional Local Plan document on site specific allocations. This will provide the opportunity to apply the policies of the plan on specific sites, providing more details on how new developments could be integrated within existing local areas.
724	Mr Gordon Turpin		Land optimisation needs to take into consideration the existing historic context and aesthetic of the area. Highams Park Station should be designated as a 'gateway to the forest' in alignment with Chingford Station. Plan does not clearly define what is meant by Highams Park, Highams Park District Centre, Highams Park Strategic Location. The park adjacent to the lake should be referred to as 'The Highams Park'. Redevelopment of the Regal Cinema building is not mentioned in the plan documents.	The Council is preparing an additional Local Plan document on site specific allocations. This will provide opportunity to apply the policies of the plan on specific sites, providing more details on how new developments could be integrated within existing local areas.
792	LVRPA	Lee Valley Regional Park Authority	The Authority supports the policy references throughout the spatial strategy that seek improvements to permeability and connectivity that would benefit cycle and pedestrian access into and through the Regional Park and linkages with other open spaces and visitor attractions.	The Council notes the statement of support provided.
795	LVRPA	Lee Valley Regional Park Authority	The Authority notes that policy for the Strategic Locations identifies a number of specific pedestrian and cycle access improvements and connections that are also promoted by or would complement the PDF Area Proposals.	This point is noted.

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Chapter 4: Waltham Forest's Spatial Strategy				
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1057	Ms Alison Blom-Cooper	Planning Department, Epping Forest District Council	Policy 3 Location and Management of Growth (D): should make reference to the EFSAC given that other assets are specifically named.	This point is noted. It is proposed to make specific reference to EFSAC in the wording of Policy 3.
2257		St William Homes LLP	St William support the Key Diagram, which identifies Lea Bridge as a Strategic Location within South Waltham Forest.	The Council notes the statement of support provided regarding the Key Diagram
2348	Aviva Investors	Aviva UK Central Services	Aviva welcomes the overall strategy for the borough and the pro-active nature of wanting to derive significant benefits to the community through substantial regeneration of parts of the borough and the emphasis on placemaking.	The Council notes the statement of support provided.
2448	Aviva Investors	Aviva UK Central Services	Aviva welcomes the overall strategy for the borough and the pro-active nature of wanting to derive significant benefits to the community through substantial regeneration of parts of the borough and the emphasis on placemaking.	This is noted.
2458	The City of London	Department of the Built Environment City of London	As the freehold owner and manager of the NSM, the CoLC recognise LBWF's efforts in producing the Consultation Version of the Local Plan and are supportive of the borough's growth aspirations.	The Council notes the statement of support from the City of London Corporation regarding the borough's growth aspirations.
2473	London Hotel Group	London Hotel Group	Our client supports with the aspirations for the Local Plan	The Council notes the statement of support provided.

Policy 1: Presumption in Favour of Sustainable Development				
ID	Full Name	Organisation	Comment	Council (Officers) Response
649	Mr Gordon Turpin	Highams Park Planning Group	Development outside of the District Centre should be guided by the principles articulated in the character assessments in the Highams Park Neighbourhood Plan.	Comment noted.

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Policy 1: Presumption in Favour of Sustainable Development				
ID	Full Name	Organisation	Comment	Council (Officers) Response
760	Mr Gordon Turpin		Development outside of the District Centre should be guided by the principles articulated in the character assessments in the Highams Park Neighbourhood Plan.	The Characterisation and Intensification study 2019 has considered how new development could be accommodated at different locations throughout the borough. The draft Local Plan contains a range of policies to guide the redevelopment proposals, including a policy on tall buildings.
966	The City of London	The Conservator's of Epping Forest	In relation to Epping Forest SAC's protection, 177 of the National Planning Policy Framework (NPPF)(Feb 2019): Given the presence of the Epping Forest Special Area of Conservation (SAC) partly within the borough's jurisdiction, together with its corresponding 6.2km Zone of Influence, which extends across the whole of the borough, the City Corporation considers that this Policy requires very significant amendment and qualification.	It is proposed to include a statement as part of the opening sentence of Paragraph 4.5 to acknowledge this point as referenced in the NPPF (Paragraph 177).
1118	Stagecoach		This presumption in favour of sustainable development is consistent with the objectives of the NPPF and is supported by Stagecoach.	The Council notes the statement of support provided.
1206	Rosie Sterry	Transport for London - Commercial Development	We suggest that this policy is more explicit in outlining the Council's aim to focus development in the 'most sustainable locations' in line with the NPPF paragraphs 108 and 118d and DLP Policies H1, D1 and D8. We believe that access to public transport is absolutely fundamental to ensuring that development is sustainable and will benefit the borough.	This point is noted. It is proposed to address this by making specific reference under Policy 3 to the need 'to focus development in the most sustainable locations' in line with both national and London Plan policy.
1649	Emily Grant		Housing in Waltham Forest isn't affordable. Yes, the UK needs housing, just like all countries. But things such as schools, GPs and hospitals need to be PRIORITISED alongside. Creating more homes means more vehicles. There's so many problems with Mini Holland (Walthamstow). Many people struggle enough as it is to park around the borough. Also, more cars has problems on an environmental side. People are wanting to transition to hybrid and electric cars. Will charging stations be created with the planned housing?	The Local Plan will be supported by an Infrastructure Delivery Plan, which will set out details of the borough's infrastructure requirements. This document will set out what is needed, where it is needed and when it is needed. This document will be published with the final version of the plan. The plan contains policies to manage parking. It supports the transition from to hybrid and electric cars. Policy 73 deals with electric vehicles and seeks to ensure the provision of supporting infrastructure such as electric vehicle charging points.

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Policy 1: Presumption in Favour of Sustainable Development				
ID	Full Name	Organisation	Comment	Council (Officers) Response
1674	London and Quadrant (L&Q)	Director	L&Q note the five golden threads that shape the DLP and consider them an appropriate framework for delivering the Council's priorities. They are also fully supportive of the overarching strategic policies and objectives of the DLP. Such policies will ensure a sustainable community environment for the benefit of the growing population of LBWF. L&Q notes this is particularly pertinent given the expected population growth and ambitious housing targets set by the draft London Plan for the borough to achieve in addressing London's chronic housing shortage and growing need for quality housing.	The Council notes the statement of support provided regarding the golden threads, the overarching strategic policies and objectives of the draft Local Plan.

Policy 2: Scale of Growth				
ID	Full Name	Organisation	Comment	Council (Officers) Response
433	Mrs Janet Charlesworth		Policy 2, point C talks of planning permission only being granted for development if sufficient infrastructure is or will be in place. I disagree with the 'will be'. I strongly believe adequate infrastructure should be in place BEFORE residents take up places in new developments. This seems particularly important given the scale of growth you envisage across the borough.	This point is noted. In practice however, it is best to link this requirement with the planning application process rather than the occupation of units, as the Council powers of enforcement apply at the planning permission stage. Furthermore, there could be a lag between completion and occupation, which is difficult to monitor.
967	The City of London	The Conservator's of Epping Forest	The City Corporation would challenge the borough to match the stated targets for housing and employment with a commensurate target for new green infrastructure provision. Policies 2 - 4 need to be subject to a Habitats Regulations Assessment and a likely Appropriate Assessment. These assessments must contain complete, precise and definitive findings and conclusions capable of removing all reasonable scientific doubt as to the effects of the plan on the SAC. The lack of any HRA in the Evidence Base (Appendices Section 2) is, therefore, of considerable concern at this comparatively late stage in the Plan process.	Work is in progress on the preparation of a Habitats Regulations Assessment (HRA). This document will be published when ready and will inform the preparation of the Proposed Submission version of the plan.

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Policy 2: Scale of Growth				
ID	Full Name	Organisation	Comment	Council (Officers) Response
1119	Stagecoach		Given the consistency with the targets contained within the Draft London Plan, which is at an advanced stage of Examination, Stagecoach are supportive of the proposed housing target under Policy 2 of the Draft Local Plan.	The Council notes the statement of support provided.
1126	Blackrock and NEAT Development		We commend LBWF for seeking to meet the objectively assessed housing need - this goes some way to ensuring that the New Local Plan will meet the 'positively prepared' soundness test.	This pointed is noted.
1139	Blackrock and NEAT Development		A local plan is 'positively prepared' where there is a strategy for meeting the housing need. The significance for the need for such a strategy is heightened because LBWF has on average delivered 742 new homes per year since the adoption of the Core Strategy in 2012, with the borough recognising that its current delivery (862 units 2017-2018) will be required to increase by 108% on the assumption that the New London Plan is adopted. This contrasts starkly with the new annual requirement which will be 1,800 as a minimum. A step-change in the approach to housing delivery is therefore needed.	The Council notes the challenges in delivering the growth targets. The Council has published a Housing Delivery Test Action Plan setting out how it would proactively work with developers and stakeholders to step up delivery.
1207	Rosie Sterry	Transport for London - Commercial Development	TfL CD supports the borough's intention to deliver the significant levels of housing, employment, office and retail development that are required. TfL own and have interests in some key landholdings in the borough in areas appropriate for residential led development which are being considered for development. We look forward to working with the borough to deliver optimised, high quality development on these sites; helping the borough to meet their housing needs.	This point is noted.
1229	Thames Water Utilities Ltd	Thames Water Utilities Ltd	In general terms Thames Water have concerns with the amount of development proposed in Waltham Forest and it is likely upgrades will be required to the wastewater network. In terms of sewage treatment works, Waltham Forest drains to Deephams STW and Beckton STW. High level assessments show that Deephams will have capacity until 2034. However,	This point is noted. The Council will work with Thames Water to ensure that growth proposals can be delivered with supporting utility infrastructure.

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			consideration needs to be given to neighbouring Boroughs growth plans and the cumulative impacts.	
1270	Josephine Vos	Transport for London - City Planning	Part C of the policy states that planning permission will only be granted for new development if it can be demonstrated that there is or will be sufficient infrastructure capacity to meet growth requirements. We will continue to work with the Council to identify future transport infrastructure requirements to support growth in the borough.	Comment noted. The Councils appreciates the declaration of support from TfL in identifying future transport infrastructure requirements to support growth. The local Plan and the policies will be updated to reflect this and to ensure general conformity.
1332		Greater London Authority	It is WF's intention through the draft Local Plan, to deliver 27,000 new homes up to 2035; an average of 1,800 dwellings a year which is slightly higher than the borough's housing target set out in Table 4.1 of the draft new London Plan and is welcomed by the Mayor.	The Council notes the statement of support provided by the GLA regarding the borough's 15 year housing target of 27,000 homes.
1336	Jennefer Peters	Senior Strategic Planner, London Plan Team Greater London Authority	WF's housing target beyond this time should be based on the 2017 SHLAA in consultation with the GLA and should include any additional capacity that may come forward as a result of committed transport infrastructure improvements as set out in Paragraph 4.1.8D of the draft new London Plan (consolidated changes).	The Council's 15 year housing target is based on the 2017 SHLAA as supplemented with the findings of the Growth Capacity Study 2019. This is an indicative target which would be monitored and reviewed taking into consideration additional capacity that may come forward as a result of committed transport infrastructure improvements in accordance with the new London Plan policy.
1340	Jennefer Peters	Senior Strategic Planner, London Plan Team Greater London Authority	The Lea Valley Opportunity Area (OA) straddles several local authorities including WF along the borough's western and southern edges and contains opportunities for growth at Blackhorse Lane, Lea Bridge, Leyton and the Lea Bridge roundabout among other areas. As part of the OA significant amounts of SIL were developed for housing. Indicative capacity for growth in the OA is identified in Table 2.1 of the draft new London Plan for 21,000 new jobs and 13,000 new homes up to 2041. As this capacity is shared it should be noted that the contribution for WF alone is for 7,290 new homes and a share of the total jobs required up to 2041.	This point is noted for reference in the plan document

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1425	Colin Setchfield	The Parish Church of Saint Edmund	Will the requirement for new development to go hand-in-hand with commensurate supporting physical, social and green infrastructure be applied within the context of the local Strategic Locations rather than across the borough as a whole? I.e. new development within Chingford Mount should require commensurate supporting infrastructure within the same area: Chingford Mount.	The Policy 2c seeks to ensure that supporting infrastructure is provided as much as possible within the local area where the development is located, in particular in the identified strategic locations. However, there will be situations where for reasons of economies of scale it would best to provide central facilities in suitable and accessible locations within reasonable travel distance. e.g. schools and health facilities, which may not necessarily be within the strategic locations.
1426	Colin Setchfield	The Parish Church of Saint Edmund	Para. 4.9 speaks of infrastructure being put into place "in locations where they will contribute positively to the well-being and social cohesion of local communities". To reiterate, does LBWF view this in terms of infrastructure within the Strategic Location of the development, or is LBWF intending this to be delivered or provide more centrally across the borough?	The plan seeks to direct growth to the strategic locations. These will be preferred locations for providing supporting investment in infrastructure provision. However, there will be situations where for example, economies of scale may also dictate the location of more centrally provided facilities. Equally, opportunities for expanded facilities at existing locations may be an important consideration.
1427	Colin Setchfield	The Parish Church of Saint Edmund	The current infrastructure plans for South Chingford are not as comprehensive as those for other parts of the borough. LBWF's current Infrastructure Projects List (January 2019), gives the refurbishment and resurfacing in two local parks (Chase Lane Park and Memorial Park) and drainage as the only specific requirements in the area.	The Local Plan will be supported by an Infrastructure Delivery Plan, which will set out details of the borough's infrastructure requirements. This document will set out what is needed, where it is needed and when it is needed. This document will be published with the final version of the plan.
1429	Colin Setchfield	The Parish Church of Saint Edmund	With its poorer transport links and lack of locally delivered community provision, greater attention needs to be given to how LBWF intends to ensure new development in this area creates a thriving and vibrant community rather than just building new homes.	The plan contains a range of policies to guide the transformation of local areas and create thriving and vibrant communities. These policies are included in the different sections of the plan, in particular the sections covering the thematic policies of the plan.
1435	Colin Setchfield	The Parish Church of Saint Edmund	Has LBWF researched the current infrastructure present in each Strategic Location? And in the light of the current provision, are there any policy documents in place, or in draft, or proposed, to determine what infrastructure needs to be put into place in the light of the Local Plan?	The Local Plan will be supported by an Infrastructure Delivery Plan, which will set out details of the borough's infrastructure requirements. This document will set out what is needed, where it is needed and when it is needed. This document will be published with the final version of the plan.

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1535	Mark Furnish	Sport England	Paragraph 4.9 highlights that the developments need to provide infrastructure to support growth. This is important as the occupiers of new development, especially residential, will generate demand for sporting provision. The existing provision within the area may not be able to accommodate this increased demand without exacerbating existing and/or predicted future deficiencies. Therefore, Sport England considers that new developments should contribute towards meeting the demand that they generate through the provision of on-site facilities and/or providing additional capacity off-site. The level and nature of any provision should be informed by a robust evidence base such as an up-to-date Sports Facilities Strategy, Playing Pitch Strategy or other relevant needs assessment. In this respect Sport England welcomes that Paragraph 4.10 highlights the role of developer contributions.	The Local Plan will be supported by an Infrastructure Delivery Plan, which will set out details of the borough's infrastructure requirements. This document will set out what is needed, where it is needed and when it is needed. This document will be published with the final version of the plan. The Council notes the statement of support provided by Sport England regarding Paragraph 4.10 of the plan.
1579	Mr Matthew Robinson		Policy 2 ("Scale of Growth") - which sets an overarching housing requirement of 27,000 new homes over the plan period (or 1,800 per annum) which matches that set by the draft London Plan. It is noted, however, that the Government's standard method produces a figure of 2,416 dwellings per annum.	The higher housing need figure from the Government's standard method is noted. The growth target as indicated is a minimum. Reference has been made to the London Plan target as this provides the London context.
1712	London and Quadrant (L&Q)	Director	It is pleasing to see the borough's Housing targets specified in DLP Policy 2 (Scale of Growth) closely align with draft London Plan and regional policy to address chronic housing needs within LBWF. We also support the position that planning permission will only be granted for new development where it can be demonstrated that there is, or will be, sufficient infrastructure capacity to support and meet growth requirements. Inherently, the policy also should acknowledge the necessity for LBWF and the regional government in taking a proactive approach toward the delivery of strategic infrastructure projects to support growing residential populations throughout LBWF. LBWF should remain conscious of the Mayor's housing targets and the housing need within the	This point is noted. The Council recognises the need to proactively work with the Mayor of London towards the delivery of strategic infrastructure projects to support growth.

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			borough and look for any way throughout the development plan for mechanisms to assist or increase the delivery of housing in an effective, efficient and responsible manner. The policy wording should be updated to reflect the need to review housing targets. This could also mean increasing the thresholds of density, dwelling numbers and intensification of land uses across strategic areas and sites within LBWF.	
1846	Mike Chrimes		1. Understandably the Plan takes cognisance of National and GLA plus and statistics, yet no consideration is really presented of the reliability of such statistics, or their relationship to the local borough's needs. Population projections are particularly suspect, as birth rates depend partly on personal choice, and mortality rates, for long accelerating are now apparently levelling off across Western Europe. The growth of London's population was the result of the swift expansion of the financial sector and an influx of EU citizens; future trends in the 15 years of post Brexit are difficult to predict. There were reports in late June 2019 that the population of London had fallen https://www.bbc.co.uk/news/uk-47529562 2. Thus the rationale for the 27,000 new homes and 47,000 new jobs is not explained, nor how they will be assessed-what is meant by a home, or a job ?FTE?. It was staged at one of the consultation meetings there are 2000 empty homes in the borough but no indication is made of how planners will bring them into use.	The draft plan rightly makes reference to national and GLA evidence as the basis for long term planning. It is, however, accepted that long-term projections are subject to change. Accordingly, the plan commits to reviewing the evidence base periodically and the review of the plan as necessary. The Government recently revised The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) to introduce a statutory requirement, under Regulation 10A, requiring Local Planning Authorities (LPAs) to review their Local Plan within five years of the date of adoption.
1851	Mike Chrimes		No consideration is taken of the impact of Brexit on EU nationals and thus housing demand and retail businesses, or school places	Policy 101 acknowledges the effect of trends and changed circumstances affecting plan projections and requirements. It explains that the Council will monitor progress towards achievement of targets and the actions to be taken including a review of the Plan.
1855	Mike Chrimes		The undoubted challenge of meeting housing demand across London is not being informed by a consultation with residents over the kind of housing they want. Repeated reference is made to tall residential units without consideration of their	The housing chapter of the plan (Chapter 8) provides further details on the delivery of the spatial strategy with regard to the housing provision. A range of housing types and tenures are

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			impact on local infrastructure and services, the neighbouring built environment, or even the desirability of living nearby. Even if the plan enables such housing units to be built younger families with children may prefer to move out of London to low rise suburban style developments. No alternative housing strategies seem to be seriously considered in the north of the borough.	proposed. Policy 63 specifically deals with taller buildings and sets out the policy criteria that will be applied.
1943	Tony Thorne		Assess the problems that are created by high density living and what is the optimum requirement to ensure that the provision provides that the problems are minimised.	The Council notes the concern expressed about the policy on intensification and its likely implications. However, if well managed, intensification could provide positive benefits to improve the quality of local environments. The plan contains a range of policies to guide the transformation of local areas. All of these policies will be considered in decision making, ensuring that an appropriate balance is maintained, and problems minimised.
1944	Tony Thorne		Look at existing resources to address shortfalls in existing provisions and what needs to be done to meet these demands.	This point is noted.
1945	Tony Thorne		Look at the demand requirement for the next 50 years and ways of making additional provision with minimal disruption.	This point is noted.
2047	Stonecrest Marble Ltd	Stonecrest Marble Ltd	Our client broadly supports the intention of the Local Plan to provide 27,000 additional homes and 46,000sqm of additional employment land during the plan period. Our client both lives, and works, within the borough and is therefore fully aware of the growth requirements of the borough.	The Council notes the statement of support provided regarding plan growth targets.
2048	Stonecrest Marble Ltd	Stonecrest Marble Ltd	However, it is noted that the Policy requirement for 46,000sqm of additional employment land falls below the Employment Land Study 2019 requirement for 52,000sqm. Policy 31 of the NPPF confirms that policies should be, "underpinned by relevant and up-to-date evidence". It is therefore considered	This point is noted for correction. It is proposed to amend Policy 2(b) to refer to 52,000sqm of employment floorspace.

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			that the policy should be revised to refer to the evidence base requirement for 52,000sqm of employment floorspace.	
2050	Stonecrest Marble Ltd	Stonecrest Marble Ltd	A rough calculation of the submitted scheme, in accordance with The Employment Density Guide 2015, suggests that a commercial development would create between 40 - 52 FTE jobs, creating c.3,000m ² of employment floorspace, and therefore making a valuable contribution towards the Council's growth targets.	It is noted that this comment relates to a proposal submitted for planning permission. This consultation seeks views on the draft Local Plan.
2254		St William Homes LLP	St William support the Policy 2 objective of delivering over the Plan period (2020-2035) significant levels of housing, employment, office and retail development. The Council plan to deliver 27,000 additional homes over this period. We consider that this should be a minimum requirement to ensure conformity with Policy 23.	The Council notes the statement of support provided regarding Policy 2.
2273	Phoebe Juggins	Department for Education	DfE notes that substantial growth in housing stock is expected in the borough in accordance with the London Plan; the consultation document anticipates a need for 27,000 new homes over the plan period (2020-2035). This will place significant pressure on social infrastructure such as education facilities. The Local Plan will need to be 'positively prepared' to meet the objectively assessed development needs and infrastructure requirements. DfE welcomes reference within the plan to support the development of appropriate social and community infrastructure at Policy 2, making specific reference to the need for infrastructure capacity to be in place to support the growth requirements.	The Council recognises the pressure on social infrastructure arising from growth. Accordingly, the plan contains policies to guide the provision and delivery of social infrastructure. The Council also notes that DfE welcomes the policy approach as set out under Policy 2.
2501	Miss Victoria Manston	Berkeley Homes, North East London	Berkeley support the Council's ambitious target set out in Policy 2 objective to deliver 27,000 additional homes in the borough between 2020 and 2035.	The Council notes the statement of support provided regarding Policy 2.

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2531	Save our Suburbs Petition - supported by 662 signatures	Chingford & Woodford Green Conservatives	Reduce the target for new homes to that set by The Mayor of London.	This point is noted for consideration.
2658	Stonecrest Marble Ltd	Stonecrest Marble Ltd	We are concerned that the plan does not, at this stage, allocate specific sites to meet the Council's growth targets with the reason for this being that policies for individual sites are found on the Brownfield Register. The Local Authority will be well aware that Brownfield Land Registers can only list sites that the Local Authority considers suitable for residential development. As such, the Plan is currently lacking on how it plans to identify sufficient sites to deliver the additional 46,000sqm (or 52,000sqm) of employment land required during the plan period.	The Council is preparing an additional Local Plan document on site specific allocations. This will provide opportunity to apply the policies of the plan on specific sites, providing more details on how new developments could be integrated within existing local areas and growth targets delivered.

Policy 3: Location and Management of Growth				
ID	Full Name	Organisation	Comment	Council (Officers) Response
217	Mr Ben Copsey		Policy 3 - Location and Management. Disproportionate development of South Walthamstow, particularly already densely occupied areas such as Lea Bridge. Use of industrial land in this area for housing denies South Walthamstow the opportunity to be "as green" as the rest of the borough. More equitable distribution of housing across the borough would allow some Brownfield sites in South Walthamstow to be redeveloped as open green spaces. South Walthamstow quality of life essentially sacrificed to high density redevelopment in favour of North Walthamstow property prices.	The proposed spatial approach recognises the divergent character of both north and south areas of the borough. Opportunities for intensification will depend on site specific circumstances including the availability of sites, the impact of local character etc. The plan contains a range of policies to guide the transformation of local areas and secure the provision of green spaces and supporting infrastructure where opportunities exist.

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Policy 3: Location and Management of Growth				
ID	Full Name	Organisation	Comment	Council (Officers) Response
478	Mrs Sarah Sanders	Committee Member, DADRA	<p>Policy 3 - Location and management of growth: A - iii "North Waltham Forest: 4,000 homes and 1,940 jobs in the strategic locations of North Chingford District Centre, Sewardstone Road Neighbourhood Centre, South Chingford District Centre, Highams Park District Centre and the North Circular Corridor."</p> <p>The DADRA Committee are concerned by the disparity between the proposed number of new homes and new job development, this is of particular concern given the higher proposed home development for the Sewardstone Road Neighbourhood Area, with lower potential for job development. The area is already at risk of becoming a dormitory town with people forced to travel greater distances for work. This does not help support the growth of a thriving neighbourhood centre, local businesses and community. This will only increase pressures on public transport and local roads, both already stretched by current commuter volumes. Although CrossRail 2 is proposed as a solution this will not be approved until 2020-2022 and at the earliest not be implemented until 2030's - we therefore do not believe this is an adequate solution.</p>	<p>The draft plan seeks to boost employment provision throughout the borough, particularly in the identified strategic locations. In practice, locational factors will often determine the potential number of jobs that could be created. In the north of the borough, a lower indicative number of jobs is stated reflecting the potential of the existing clusters of employment activity to expand and grow through intensification. Clearly, the approach taken to harness employment potential at existing locations could result in uneven spatial distribution of employment growth between different locations. However, throughout the borough, it is expected that the benefits of employment growth at the different locations will be shared by all residents as there would be more locally accessible employment opportunities within reasonable travelling distance of borough residents.</p>
867	Alice Roberts	Campaign to Protect Rural England (CPRE)	<p>We are concerned that the Green Belt review is looking at protected areas of 'brownfield' or industrial land. Having ourselves reviewed Green Belt and MOL sites along the North Circular and at Lea Bridge we cannot see that there are any which are not vitally important in terms of the five NPPF criteria and London Plan policy.</p>	<p>The Council has carried out a Green Belt/MOL review. This study is published on the Council's website.</p>
875	Alice Roberts	Campaign to Protect Rural England (CPRE)	<p>In the case of the Thames Water Depot, it should be noted that an area of hardstanding such as this does not constitute a 'brownfield' site. It is simply an area of hardstanding within what is in fact a park as well as open land, albeit with no current public access.</p>	<p>In considering this point, the Council will be minded by the definition of previously developed land as set out in the NPPF.</p>

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Policy 3: Location and Management of Growth				
ID	Full Name	Organisation	Comment	Council (Officers) Response
903	Mr Mathew Frith		Policy 3: Location and management of Growth Part D: We welcome and support this, but it should include Sites of Importance for Nature Conservation within the types of sites to be protected. We would wish to see the Plan enable a net gain to the quantity and quality of the existing SINC network in the borough.	The Council notes the statement of support provided. Policy 3 makes reference to some examples of designated sites/areas. A full listing of all designations is mentioned elsewhere under the thematic policies of the plan. The policies map shows all of these designations.
904	Mr Mathew Frith		Part D: We welcome and support this, but it should include Sites of Importance for Nature Conservation within the types of sites to be protected. We would wish to see the Plan enable a net gain to the quantity and quality of the existing SINC network in the borough.	The Council notes the statement of support provided. The point made regarding the expansion of the SINC network is noted.
906	Mr Mathew Frith		Part E: We support this in its recognition of previously developed land with high environmental value.	The Council notes the statement of support provided.
968	The City of London	The Conservator's of Epping Forest	While the listing is not expected to be definitive, it would be sensible to see the borough's higher tier protections especially Special Area of Conservation (SAC) and Sites of Special Scientific Interest (SSSI), which coincide with two thirds of Epping Forest, properly reflected in the policy.	Policy 3 makes reference to some examples of designated sites/areas. A full listing of all designations is mentioned elsewhere under the thematic policies of the plan. The policies map shows all of these designations.
1055	Ms Alison Blom-Cooper	Planning Department, Epping Forest District Council	Policy 3 Location and Management of Growth (D): should make reference to the EFSAC given that other assets are specifically named.	It is proposed to make reference to EFSAC in the wording of Policy 3.
1068	Mr Tim Brennan	Historic England	While we do not disagree with the intention to direct the largest share of housing growth towards locations with the best public transport access (largely towards the south of the borough), we would stress the implications for existing local character should this not be undertaken through a sensitive and contextually aware approach. As a result, we have some concerns as to the detail behind this proposed approach and	The plan acknowledges the likely impact of growth on heritage assets and therefore contains policies regarding this. The Council is preparing an additional Local Plan document on site specific allocations. This will provide opportunity to apply the policies of the plan on specific sites, providing more details on how new developments could be integrated within existing local areas, also demonstrating how any heritage assets could be protected.

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			the potential implications for the historic environment if it were to be implemented in its current form.	
1120	Stagecoach		Stagecoach support the general spatial strategy proposed under Policy 3, However, would suggest that more emphasis could be placed on the suitability of sustainably located, well-connected sites for higher density development.	The Council notes the statement of support provided regarding the proposed spatial strategy. The strategy directs most forms of new development and growth to the more sustainable locations.
1140	Blackrock and NEAT Development		Whilst we are broadly supportive of the principle of including three spatial sub areas and focusing growth within strategic locations within each, we request that the referenced Growth Capacity Study is published in order to fully understand LBWF's assumptions for the distribution of growth.	The Growth Capacity Study is published on the Council's website.
1141	Blackrock and NEAT Development		The assertion that the south of the borough will accommodate the most significant scale of growth is reflected in the highest housing and jobs targets of the three sub areas. It is requested that further details of this is published as part of LBWF's latest evidence and we make further comments in this regard in the subsequent sections.	The Council is preparing an additional Local Plan document on site specific allocations. This will provide opportunity to apply the policies of the plan on specific sites, setting out how housing and job numbers could be delivered on identified sites and providing more details on how new developments could be integrated within existing local areas.
1142	Blackrock and NEAT Development		The New Local Plan goes on to state (paragraphs 4.17-4.18) that 'Areas of Change and Opportunity' (ACOs) consisting of "small clusters of sites where an integrated, coordinated and comprehensive approach to site planning would be encouraged over piecemeal development", where such opportunities are maximised. We are supportive of this approach and would welcome further discussions with LBWF on this matter, However, we request that in the first instance LBWF provides further details of the approach to be taken for ACOs.	The Council is preparing an additional Local Plan document on site specific allocations. This will provide opportunity to apply the policies of the plan on specific sites, providing more details on how new developments could be integrated within existing local areas.
1208	Rosie Sterry	Transport for London - Commercial Development	TfL CD strongly supports new development being focused in strategic locations as a sustainable approach to growth and the council's intent to focus development in locations that are or can be made sustainable.	The Council notes TfL's support on this point.

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1209	Rosie Sterry	Transport for London- Commercial Development	The Key Diagram indicates that Walthamstow Town Centre is identified as primary location for growth and we strongly support the identification of this area as a Strategic location.	The Council notes the statement of support provided by TfL regarding the identification of Walthamstow Town Centre as a strategic location.
1210	Rosie Sterry	Transport for London - Commercial Development	TfL CD strongly supports part (e) of Policy 3 which states that “redevelopment of underused and vacant land, in particular, sites listed on the Brownfield Land Register, will be prioritised”. This encourages development to make the most efficient use of all available land and aligns with DLP policies H1 and GG2. The policy could go further to identify the types of brownfield land which may be considered suitable for development, for example, underutilised car parks in areas of high transport accessibility.	The Council notes the statement of support provided by TfL regarding part (e) of Policy 3.
1211	Rosie Sterry	Transport for London - Commercial Development	TfL CD agrees that any development which may prejudice the future development of a neighbouring site and or prohibits the comprehensive development of a larger site should be resisted.	It is noted that TfL agrees with Policy 3 (H (ii)).
1212	Rosie Sterry	Transport for London - Commercial Development	These sites are all in accessible locations with the potential to support good growth in the borough in strategic locations, and so it is important that the development potential of these sites is preserved.	This point is noted.
1213	Rosie Sterry	Transport for London - Commercial Development	To align with Policy H1 of the DLP the following addition to the supporting text (at Paragraph 4.12) is suggested to make it clear how important public transport is to sustainable development: “Steers most new development to those places that offer the best access to services, facilities and public transport (both now and for the foreseeable future). This can help reduce the need to travel, as well as making best use of existing infrastructure and previously developed land in built-up areas.”	This point is noted for inclusion under Paragraph 4.12 of the draft Local Plan.
1214	Rosie Sterry	Transport for London -	TFL CD supports Paragraph 4.14 of the supporting text which sets out that new development should occur “in a range of sites (small, medium and large). TfL’s landholdings and interests	The notes the statement of support provided by TfL regarding Paragraph 4.14 of the draft plan.

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Policy 3: Location and Management of Growth				
ID	Full Name	Organisation	Comment	Council (Officers) Response
		Commercial Development	within the borough vary in size and some of these sites will be appropriate to be bought forward through the GLA's Small Sites Programme. This policy recognises the potential of small sites and the role they can play in meeting housing targets, aligning with DLP Policy H2 and H1 which encourage boroughs to allocate an "appropriate range of sites for development".	
1215	Rosie Sterry	Transport for London - Commercial Development	TfL CD support the strategic approach to planning and development set out in Paragraph 4.15. Encouraging new development which makes the best use of land to be focused in the most sustainable locations, close to community facilities and public transport aligns with DLP policy H1, D1 and GG2. The DLP also promotes maximising residential opportunities in centres through mixed use development which will help the borough to meet their housing target.	The Council notes the statement of support provided by TfL regarding Paragraph 4.15 of the draft plan.
1333		Greater London Authority	The strategic approach to delivering growth across three broad areas within North, Central and South WF is set out clearly and is welcomed.	The Council notes the statement of support provided by the GLA regarding the proposed spatial approach.
1334	Jennefer Peters	Senior Strategic Planner, London Plan Team Greater London Authority	The distribution of anticipated growth should be based on local up-to-date evidence such as the 2017 Strategic Housing Land Availability Assessment (SHLAA), which demonstrates each areas ability to accommodate the capacity for growth and should include the potential to deliver small sites in accordance with draft new London Plan Policy H2A.	The distribution of anticipated growth is based on supporting evidence from the 2017 Strategic Housing Land Availability Assessment (SHLAA) and the Council's Growth Capacity Study (2019).
1341	Jennefer Peters	Senior Strategic Planner, London Plan Team Greater London Authority	Crossrail 2 will unlock long term development potential within WF and should be recognised as part of the draft Local Plan and the overarching strategic approach to delivering growth during this plan period and beyond.	This point is noted for referencing in the plan document - in Chapter 4 (Waltham Forest Spatial Strategy).

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Policy 3: Location and Management of Growth				
ID	Full Name	Organisation	Comment	Council (Officers) Response
1436	Colin Setchfield	The Parish Church of Saint Edmund	South Chingford has few heritage assets remaining. The only Listed Buildings are Chingford Mill Pumping Station with its metal railings and water turbine house, and St Edmund's Parish Church. Additionally, out of 153 structures locally listed by LBWF only two are within South Chingford: 20/22 Chingford Mount Road, and Chingford Mount Cemetery gates/piers. What plans does LBWF have to ensure the Chingford Mount Strategic Location also has a sense of its own heritage and cultural identity?	The designation of heritage assets must be justified by evidence. The Council will consider new heritage nominations by individuals or groups for consideration. This draft Plan has been published for consultation to allow all stakeholders, residents, community groups and indeed everyone with an interest in Waltham Forest to comment on the document and help establish the vision for local areas including aspects of cultural heritage.
1437	Colin Setchfield	The Parish Church of Saint Edmund	Recently, the Twentieth Century Society referred to the (unlisted) former South Chingford Library (currently used as a community hub) as a good example of a 1930s library.	This point is noted for consideration.
1438	Colin Setchfield	The Parish Church of Saint Edmund	New housing will be "delivered close to community facilities and public transport". Would LBWF confirm (1) which community facilities it determines to be necessary within close reach of new developments, (2) which of these currently exist, and (3) which need to be planned for within each area?	The Local Plan will be supported by an Infrastructure Delivery Plan, which will set out details of the borough's infrastructure requirements. This document will set out what is needed, where it is needed and when it is needed. This document will be published with the final version of the plan.
1439	Colin Setchfield	The Parish Church of Saint Edmund	Have any 'Areas of Change and Opportunity' been identified already within Strategic Locations? If so, can these be published?	The Council is preparing an additional Local Plan document on site specific allocations which will be published for consultation later in 2020. This will provide opportunity to apply the policies of the plan on specific sites (areas of change and opportunity), providing more details on how new developments could be integrated within existing local areas.
1440	Colin Setchfield	The Parish Church of Saint Edmund	Is there a timescale for the publication of Masterplan Supplementary Planning Documents for Strategic Locations? We assume that these may provide more detail and answer some of the questions we have.	The current work programme prioritises the preparation of the Local Plan. Further information on the preparation of SPDs and Masterplans will be published in due course.
1441	Colin Setchfield	The Parish Church of Saint Edmund	Though we are aware that such SPDs do not form part of the Local Plan itself, and therefore are not subject to independent examination, can LBWF give reassurance that these will be made publicly available, and allow public consultation?	Although SPDs are not independently examined, they must be prepared and consulted on prior to adoption. The Council's Statement of Community Involvement 2018 provides further information on the preparation of SPDs and how community

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				groups, stakeholders and resident can get involved in their preparation.
1442	Colin Setchfield	The Parish Church of Saint Edmund	We assume that these may provide more detail and answer some of the questions we have. Though we are aware that such SPDs do not form part of the Local Plan itself, and therefore are not subject to independent examination, can LBWF give reassurance that these will be made publicly available, and allow public consultation?	Although SPDs are not independently examined, they must be prepared and consulted on prior to adoption. The Council's Statement of Community Involvement 2018 provides further information on the preparation of SPDs and how community groups, stakeholders and resident can get involved in their preparation.
1536	Mark Furnish	Sport England	Sport England recommend that Policy 3 D/E ensures playing fields are protected provided the emerging Playing Pitch Strategy confirms all sites need protecting. Similarly, built sports facilities, such as sports halls etc., should be protected unless a built sports facility strategy indicates a facility is surplus. This would ensure that the Draft Local Plan is consistent with the protection afforded to sports facilities in the NPPF, Paragraph 97.	This point is noted. It is proposed to include a reference to playing fields in Policy 3D - as part of the text regarding 'designated sites and areas'.
1581	Mr Matthew Robinson		Policy 3 ("Location and Management of Growth") - which identifies South Waltham Forest as a primary location for growth (for a minimum of 15,000 new homes and 3,250 new jobs) with Lea Bridge as a "Strategic Location" within this. Peabody support the use of masterplans to guide development in these locations, subject to an appropriate level of flexibility being retained.	The Council notes the statement of support provided regarding the use of masterplans to guide developments in strategic locations.
1593	Bob Bennet		It is noted that there twenty seven thousand new homes in the borough during the Plan period, but less than seven thousand new jobs in the same period. Bearing in mind the need for a greater balance between residents and local jobs; at first sight the outcome in such an increase in residents and limited increase in new jobs is that there will be even greater pressure on public transport as a result of increasing out commuting.	The Local Plan will be supported by an Infrastructure Delivery Plan, which will set out details of the borough's infrastructure requirements. This document will set out what transport requirements will be needed, where it is needed and when it is needed. This document will be published with the final version of the plan.

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1594	Bob Bennet		It is noted that this policy seeks to make effective use of previously developed land, but this policy will not be achieved unless there is a bit more creativity and flexibility in the use of development management standards e.g. private amenity space, overlooking and overshadowing etc.	This point is noted for consideration - regarding the need for more creativity and flexibility in the use of development management standards.
1714	London and Quadrant (L&Q)	Director	Overall, L&Q support the principles of DLP Policy 3 (Location and Management of Growth) and DLP Policy 4 (Good Growth) in that new development should provide a well-balanced mix of economic, social and environmental benefits in strategic locations (such as Wood Street - DLP Policy 16), encouraging new development to those places that offer the access to services and facilities. Planning in these strategic areas should be flexible and open to facilitate and accommodate development that will help to achieve or exceed these targets so long as it can be demonstrated the development scale and size can be sustained.	The Council notes the statement of support from L&Q regarding the principles set out under Policy 3 (Location and Management of Growth). The need for flexible and open approach is noted. The draft Local Plan has a borough-wide strategic focus to be supported by more detailed guidance in the form of supplementary planning documents and masterplans for identified local areas.
1720	London and Quadrant (L&Q)	Director	The idea to develop future Masterplan SPDs for each of the strategic areas is also supported, though these should be developed to incorporate and build on existing AAPs (where relevant) and carry forward their site allocations where relevant, updating the particulars for the developments on these sites to reflect strategic objectives, expected and required housing and employment demand over the development period 2020-2035. This is important in order to accommodate development proposals that are in the pipeline and have been developing for some time.	The Council notes the statement of support regarding the preparation of Masterplan SPDs. These will be prepared with public consultation, providing the opportunity for the scope of the document to be considered.
1729	Wanis Ltd	Wanis Ltd	Wanis fully supports the identification of Lea Bridge as a strategic and primary location for housing and job growth. The scale of the development sites available within the area provide a real opportunity to deliver much of the housing and job growth for the South Waltham Forest Area; with the upgraded Lea Bridge station and access to existing services and facilities in	The Council notes the statement of support provided regarding the policies set out for Lea Bridge strategic location.

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			the local centres and green infrastructure making Lea Bridge a genuinely sustainable location for growth.	
1732	Wanis Ltd	Wanis Ltd	Paragraph 4.20 - Wanis supports the Council's pragmatic approach to engage in partnerships with developers to prepare design concept plans and/ or masterplans for sites that may progress through the planning process in advance of the Council's preparation of its own Masterplan SPDs. This enables site owners and investors to progress with site development.	The Council notes the statement of support provided regarding Paragraph 4.20.
1734	Wanis Ltd	Wanis Ltd	Paragraph 4.27 - The Wanis site is identified as falling within a SIL allocation within the Lea Bridge Strategic Location. This means that there is support through policy 7 for the redevelopment of the site for intensified employment use along with co-location with appropriate non-employment uses in accordance with policy 39.	This point is noted.
1831	Mr John Hugill		Where is the justification for the figure of 27,000 for new homes in Waltham Forest and for the 300 in North Chingford?	The 27,000 Housing figure for the borough is justified by the Strategic Housing Market Assessment that takes into consideration the projected housing need in the borough for the plan period. To accommodate the projected growth effectively, the Council split the borough into three areas (North, South and Central). From this the council has taken the decision to proportionally allocate the housing growth to best align with existing and proposed infrastructure and amenities that will come forward in the plan period.
1834	Mr John Hugill		Where are the 1,940 increase in jobs to come from?	Chapter 9 (Building a Resilient and Creative Economy) sets out the range of policies intended to encourage the creation of employment opportunities. For example, policy 37 seeks to broaden the economic base through the provision of a range of employment floorspace typologies intended to attract new business activities.

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1850	Peter Mudge		Far from seeking to remove MOL, the Council should be trying to increase it. A prime candidate would be the narrow strip of land between Leyton Jubilee Park and Orient Way, which has recently been opened up with a number of footpaths. Another would be the southern end of the Lea Bridge Gasworks site, which used to be open space adjacent to Marsh Lane Fields until quite recently.	This point is noted for consideration.
1964	Dr Robert Gay		I see no reason why it is expected that the south of the borough (basically, the former borough of Leyton, that is Leyton and Leytonstone) can or should accommodate 15000 new homes, more than half the total allocated to the borough. I do not wish to play 'beggar my neighbour' and I can see that the centre of Walthamstow and Blackhorse Road are already heavily developed, but the share out of the misery appears unfair.	The draft Local Plan acknowledges the distinctive nature of the different parts of the borough and sets out a spatial approach that takes account of the unique character of local areas. The distribution of growth has also been informed by evidence which has considered site specific development opportunities and potential through the Growth Capacity Study 2019 and also the Characterisation and Intensification study which has considered how new development could be accommodated at the locations where opportunities exist. Clearly, the approach taken will result in uneven spatial distribution of growth, However, it is expected that the benefits of growth will be shared throughout the borough" through growth in employment, housing and infrastructure provision accessed by all borough residents.
1966	Dr Robert Gay		Specifically with regard to point D in the policy, regard should also be had to Areas of Special Character and to locally listed buildings such as the Red Lion in the Leytonstone High Road, and to the settings of locally listed buildings. (Policy 63(C) mentions locally listed buildings but not Areas of Special Character.)	This point is noted. It is proposed to also make reference to Areas of Special Character in the policy statement (Policy 3D).
1967	Dr Robert Gay		Also with regard to point D, it was suggested at the meeting by way of exception to this policy point that the Council should investigate the possibility of purchasing land in the area of the Northern part of Epping Forest to make an exchange for the Forest land south of Whipps Cross Road, East of James Lane, by	This point is noted for consideration.

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			St Andrews Church, which is detached from the main part of the Forest by the Whipps Cross Road and in my opinion is of little landscape value, and dwellings in the area have easy access to the part of the Forest north of the Whipps Cross Road.	
2051	Stonecrest Marble Ltd	Stonecrest Marble Ltd	As above, our client supports the intention of the plan to provide 4,000 new homes and 1,940 new jobs within North Waltham Forest and supports the intention of the Plan to identify the North Circular Corridor, in which our client's site lies, as a focus for development.	The Council notes the statement of support provided regarding the growth target for North Waltham Forest.
2055	Stonecrest Marble Ltd	Stonecrest Marble Ltd	The report confirms, at Paragraph 3.70, that, "given the opportunity to connect to the A406 sites are likely to be attractive if additional capacity can be identified, potentially through sites such as Chingford Island, shown below in Figure 6, which are considered to be performing poorly in terms of greenbelt assessment." We therefore suggest that the Regulation 19 Local Plan, which the Council expects to publish in Spring 2020, should specifically allocate suitable sites within the North Circular Corridor, including our client's site, for commercial development. Such an approach would give clarity to Commercial operators, such as our client, that their sites will be able to be brought forward for commercial development and ensure that the Council's ambitious growth targets can be met.	This point is noted for consideration - mindful of the strategic policy requirements of the London Plan and the findings of the Council's evidence base on Green Belt/MOL and the need to demonstrate exceptional circumstances in the event that boundaries are altered in the Local Plan process.
2056	Stonecrest Marble Ltd	Stonecrest Marble Ltd	Reference to our client's site is further made at Paragraph 4.12, which highlights the site as a 'Key Opportunity' to deliver new and additional floorspace to meet future needs, where undeveloped land could be brought forward.	This point is noted for consideration - mindful of the strategic policy requirements of the London Plan and the findings of the Council's evidence base on Green Belt/MOL and the need to demonstrate exceptional circumstances in the event that boundaries are altered in the Local Plan process.
2057	Stonecrest Marble Ltd	Stonecrest Marble Ltd	With regards criterion (d), we support the intention to protect designated sites and areas. However, the Council's evidence base in relation to Green Belts acknowledges that there are specific sites which perform very poorly against the NPPFs	This point is noted for consideration - mindful of the strategic policy requirements of the London Plan and the findings of the Council's evidence base on Green Belt/MOL and the need to demonstrate exceptional circumstances in the event that boundaries are altered in the Local Plan process.

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			Green Belt purposes (NPPF para. 134), including our client's site.	
2059	Stonecrest Marble Ltd	Stonecrest Marble Ltd	The Council undertook a review of the Green Belt and Metropolitan Open Land in December 2015. This report has yet to be released to the public but was obtained via a FOI request to Waltham Forest.	The Green Belt/MOL study has been published on the Council's website.
2060	Stonecrest Marble Ltd	Stonecrest Marble Ltd	Land at Harbet Road, Chingford was reviewed as site GB32. The review assessed the site against the five purposes of the Green Belt, ultimately concluding that the site could be considered for removal from the Green Belt.	This point is noted for consideration - mindful of the strategic policy requirements of the London Plan and the findings of the Council's evidence base on Green Belt/MOL and the need to demonstrate exceptional circumstances in the event that boundaries are altered in the Local Plan process.
2062	Stonecrest Marble Ltd	Stonecrest Marble Ltd	Land at Harbet Road, Chingford was reviewed as site GB32. The review assessed the site against the five purposes of the Green Belt, ultimately concluding that the site could be considered for removal from the Green Belt. The review scores each of purpose out of 4, giving a total available score of 20. Parcel GB32 scores 9 out of 20, and is identified within the review as being a 'low performing Green Belt parcel' and is described as: "parcels generally perform poorly against all Green Belt purposes, apart from Purpose 2, which considers the role of Green Belt in preventing merging. Significantly parcels Gb31 and GB32 were not considered to be 'countryside' as they are significantly influenced by urban land uses (and in the case of GB32, the land itself has been urbanised)." In particular, the report confirmed that its removal, "would result in only limited harm to the remainder of the Green Belt by virtue of the fact that development in these locations would effectively be 'infill' and would be well contained by the landscape." As such, we would request the Local Plan should be advanced and specifically identify any allocated suitable sites for release from the Green Belt in order to meet the Local Plans Growth	This point is noted for careful consideration - mindful of the strategic policy requirements of the London Plan and the findings of the Council's evidence base on Green Belt/MOL and the need to demonstrate exceptional circumstances.

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			Requirements. Such an approach would give clarity and certainty to landowners that their sites can be developed.	
2075	Mike Sparrow		I would point out that there are many other 'brown spaces' to build on in London and still in this borough and it is surely your responsibility to protect our 'green' spaces and direct all new builds to brown spaces. However, you also indicate in your plans for this borough that you have already achieved your 'goal' of building. If this is so then just please stop trying to push the envelope so to speak, which may well be intended to impress those in power that this borough can build loads of new housing for everyone. Such a threat to build on the greener parts of London around this area is anti-environment and if it was bulldozed through as most council plans are, undemocratic in the extreme. You don't specify, but if you also count the closed-off grassed playing pitch area opposite the shops and closed shops along Sewardstone as 'brown space', then that would surely also be a dereliction of duty to your residents.	In accordance with national policy and the London Plan, the draft Local Plan seeks to make effective use of previously developed land. The plan contains a range of policies to guide the redevelopment and the effective use of suitable land. All of these policies included in the Local Plan will be considered in decision making, ensuring that an appropriate balance is maintained in encouraging growth and in protecting valuable areas including green spaces.
2174	Capital and Regional Plc	Capital and Regional Plc	We support Draft Local Plan Policy 3, which seeks to focus new development, regeneration and investment activities in the strategic locations identified by the draft policy, including Walthamstow Town Centre, whilst directing and consolidating any new retail and other town centres uses to the designated centres and maximising residential opportunities in these centres through mixed use development.	The Council notes the statement of support provided regarding Policy 3 of the plan.
2175	Capital and Regional Plc	Capital and Regional Plc	We support Draft Local Plan Policy 3, which seeks to focus new development, regeneration and investment activities in the strategic locations identified by the draft policy, including Walthamstow Town Centre, whilst directing and consolidating any new retail and other town centres uses to the designated centres and maximising residential opportunities in these centres through mixed use development.	The Council notes the statement of support provided regarding Policy 3 of the plan.

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2255		St William Homes LLP	The majority of this growth will be focused in South Waltham Forest with “a minimum of 15,000 new homes” in the strategic locations which include Lea Bridge (Policy 3) which we support.	The Council notes the statement of support provided regarding Policy 3.
2349	Aviva Investors	Aviva UK Central Services	We welcome the identification of “South Waltham Forest” as a strategic area of change, growth and regeneration through redevelopment, and specifically, the identification of the Leyton Mills site for redevelopment.	The Council notes the statement of support provided.
2493	London Hotel Group	London Hotel Group	Part A, Site Assessment - which will inform and determine the appropriate nature of intensification appears logical and consistent with ensuring the effective use of previously developed land (Policy 3 (E) ‘Location and Management of Growth’), ensuring that development is planned and implemented in a coordinated way in identified areas of change (Policy 3 (F)).	The Council notes the statement of support provided regarding Policy 5.
2572	Anne Hamshaw		Why do we need growth Zones? This is obviously for people to move into an already overloaded borough.	National planning policy (NPPF) mentions that Local Plans must meet the objectively assessed need for homes and jobs in their area. Accordingly, borough wide needs for employment and housing must be met and accommodated within the borough. It is considered that focusing growth in the identified strategic locations will reduce the pressure for substantial incremental development in predominately established residential areas.
2651	Milena Petrovic	Sustainable Development Officer, Thames Team Natural England	Furthermore, in Policy 3D, please add Sites of Special Scientific Interest and Special Areas of Conservation to the list of protected designated sites and areas.	This response is noted. It is proposed to add reference to Sites of Special Scientific Interest and Special Areas of Conservation at Policy 3d.
2654	The City of London	Department of the Built Environment City of London	The City Corporation welcomes the commitment to masterplans at 4.19 (page 20). Masterplans should play a key role in managing the coherent development of green and blue infrastructure within a green infrastructure network.	This point is noted.

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2655	London and Quadrant (L&Q)	Director	L&Q fully support the borough's proactive approach to delivering the housing targets published in the Housing Delivery Test Action Plan (July 2019), which sets out means and measures 'to increase the delivery of new homes across the borough' to ensure that everyone 'has a decent roof over their heads'. Considering the above, the borough's local housing targets and policy guidance could be developed further to ensure the delivery of the housing needed throughout the borough, particularly in Strategic Locations such as Wood Street and non-designated employment sites, as identified in the Local Plan (DLP Policy 23). Such sites should be far more ambitious with respect to minimum housing targets.	The Council notes the statement of support provided regarding housing targets. The plan contains policies to delivery housing target throughout the borough including Wood Street strategic location.
2678	Mrs Claire Ford		In regards to North Chingford - Station Road, the plan fails to represent the needs of a very distinctive low rise suburban community and provides no up to date evidence to justify substantial planned extensive site redevelopments for housing.	The draft Local Plan acknowledges the distinctive nature of the different parts of the borough and sets out a spatial approach that takes account of the unique character of local areas and the diverse communities. Policy 18 seeks to apply place-making principles that reflect the character and local distinctiveness of North Chingford area including the station road area. The Council is preparing an additional Local Plan document on site specific allocations. This will provide opportunity to apply the policies of the plan on specific sites, providing more details on how new developments could be integrated within existing local areas. Evidence justifying the growth targets come from the Waltham Forest Growth Capacity Study (2019) and the Characterisation and Intensification study (2019)
2680	Mrs Claire Ford		There is not much attention/detail to the historic fabric of North Chingford town centre and the desire of the community to preserve and enhance the 'village feel' of the town centre.	The plan contains a range of policies to guide redevelopment proposals in all designated centres including North Centre, also taking into account the unique character of the distinctive parts of the borough. The Council is preparing an additional Local Plan document on site specific allocations. This will provide opportunity to apply the policies of the plan on specific sites,

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				providing more details on how new developments could be integrated within existing local areas.
2696	Mr Gordon Turpin		References to housing targets are potentially misleading for many consultees who will most likely focus on their own specific areas when reviewing the documents. The monitoring target is set at 4,000 dwellings, which is 74% higher than the 2,300 homes identified for the North Waltham Forest Strategic Area. Delivery of housing targets should not be delivered in such a way that they only provide minimum standards as this is to the detriment of the area and its residents.	The Council notes the error in the growth figures stated. This will be corrected. The plan contains a range of policies to ensure compliance with planning standards and controls.
3012	Stonecrest Marble Ltd	Stonecrest Marble Ltd	With regards to criterion (e), we support the need to make effective use of effective land and support the broad thrust of the policy which seeks to focus on the redevelopment of underuses and vacant land. However, without specifically allocating sites, the Plan cannot be considered sound as it is currently drafted as it has not identified a suitable strategy in which to meet its Growth Requirements.	The Council is preparing an additional Local Plan document on site specific allocations which will be consulted upon later in 2020. This will provide opportunity to apply the policies of the plan on identified 'opportunity' sites.
3013	Stonecrest Marble Ltd	Stonecrest Marble Ltd	The policy also refers to prioritising sites listed on the Brownfield Land Register, which could be a suitable strategy for residential development, but which would not have the power to address employment land requirements. We do not believe this strategy is appropriate for the area and conflicts with supporting and growing the economy. The approach does not therefore reflect the needs of the borough.	The Council considers that the use of the Brownfield Land register is an important planning tool in delivering the plan proposals. In addition, the Council is preparing a site-specific allocations document which be consulted upon later in 2020. This will provide opportunity to apply the policies of the plan on identified 'opportunity' sites.
3014	Stonecrest Marble Ltd	Stonecrest Marble Ltd	Whilst the broad approach to growing the economy is supported, the manner this policy has been developed is not considered to be the most appropriate strategy or is justified against reasonable alternatives. We therefore object to the strategy of development. The approach is considered to be flawed, as the lack of allocations will create uncertainty and would adversely impact delivery. The Plan is therefore not	The Council is preparing an additional Local Plan document on site specific allocations, which will be consulted upon later in 2020. This will provide opportunity to apply the policies of the plan on identified 'opportunity' sites.

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			considered to be positively prepared, justified or effective. We therefore object to the distribution of growth identified in Policy 3. We do not believe that the approach identified leads to a positively prepared Plan.	

Policy 4: Ensuring Good Growth				
ID	Full Name	Organisation	Comment	Council (Officers) Response
667	Mr Peter o Kane		The document at paras 4.34 to 4.37 talks about “appropriate density and intensification” but critically gives no guidelines as to what is “appropriate”?	Comment noted. Paragraphs 4.36 - 4.37 set out the policy approach on density and intensification. For better clarity and interpretation, it is proposed to amend this policy to provide further guidance.
907	Mr Mathew Frith		Part H: We welcome and support this.	The Council notes the statement of support provided.
908	Mr Mathew Frith		Paras 4.30-31: We support these	The Council notes the statement of support provided.
978	Alistair Twiname		I would suggest inclusion of methods to prevent sites being used as car-parking while remaining un-developed. For example, the standard site in Blackhorse Road is closed but is functioning as a single-level public car park. This essentially funds the owner’s land-banking activities with little or no positive benefits. If the plan were able to prevent this activity or at least discourage it from happening in again it will encourage development of available sites, reduce car traffic. A similar change was carried out in Leeds in the 00's; there they increased the business rates on single-level car parks (so excluded more compact multi-story parking etc) and it was very successful in kick starting developments as empty sites went from an asset to a liability.	This suggestion is noted for consideration.

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Policy 4: Ensuring Good Growth				
ID	Full Name	Organisation	Comment	Council (Officers) Response
1144	Blackrock and NEAT Development		New Local Plan Policy 4 seeks to ensure good growth and we are pleased to note that it encourages the efficient use of land through intensification and mixed-use development (part a), which is in line with the objectives of the NPPF.	This point is noted.
1147	Blackrock and NEAT Development		Whilst we are supportive of the approaches included within Policy 4, it is requested that the Characterisation and Intensification Study (2019) which is identified (Paragraph 4.36) as evidence which supports the character-led approach to intensification (as set out within the Policy) is published and made publicly available	The Characterisation and Intensification Study (2019) is on the Council's website at https://walthamforest.gov.uk/sites/default/files/LBWF%20Character%20and%20Intensification%20Study%2C%202019.pdf
1216	Rosie Sterry	Transport for London - Commercial Development	We agree that the principles of good growth outlined in the draft new London Plan should underpin the boroughs approach to development in order to ensure the borough delivers sustainable development.	This pointed is noted.
1217	Rosie Sterry	Transport for London - Commercial Development	We especially support the drive to make the most efficient use of land through intensification. However, we feel it is critical that this policy includes a requirement for development to be focused in the 'most sustainable locations, in places that are (or are planned to be) well-connected by public transport' as this is fundamental to supporting good growth across the borough.	This pointed is noted. It proposed to acknowledge this point by making reference to ' the most sustainable locations' in the policy sentence.
1464	Ms Hanna Chalmers		Most Londoners and people living in Highams Park understand the need for more housing - there are opportunities as outlined in this letter from the HPPG to build more housing without losing the distinct assets and local character of the area that we have here and the one civic space we have in Highams Park - the purpose built, recently refurbished and incredibly well utilised library.	The plan contains policies to guide development proposals ensuring that local character is protected. There are no proposals in the draft Local Plan to demolish the library.
1471	Sara Doyle		It's very disappointing that the council appear to have disregarded the previous findings of The HPPG, given they work so hard to promote the views of our local community. As per the contents of the attached, I'd particularly like to add my own objections to any redevelopment of important community sites	The plan contains policies to guide development proposals ensuring that local character is protected. There are no proposals in the draft Local Plan to demolish the library.

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Policy 4: Ensuring Good Growth				
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			such as the library and the station. I appreciate new homes must be built, but the number suggested by the council in this area is too high and would be to the detriment of the local community.	
1488	Sharlene Sarolli		Most Londoners and people living in Highams Park understand the need for more housing - there are opportunities as outlined in this letter from the HPPG to build more housing without losing the distinct assets and local character of the area that we have here and the one civic space we have in Highams Park - the purpose built, recently refurbished and incredibly well utilised library.	The plan contains policies to guide development proposals ensuring that local character is protected. There are no proposals in the draft Local Plan to demolish the library.
1537	Mark Furnish	Sport England	Again Sport England welcomes that supporting social infrastructure is required parallel with growth and particularly welcome that Paragraph 4.31 specifically mentions sports facilities and Policy 4 seeks for development to improve/enable healthier lifestyles. The Council could consider providing links to Active Design (see comments relating to Policies 59, 60 and 63 below) to assist developers/applicants to plan for active lifestyles.	The Council notes the statement of support provided by Sports England relating to Paragraph 4.31 and Policy 4.
1595	Bob Bennet		The reference to catering for people with special housing needs is welcome, although, as referred to later, the actual policies as drafted will not necessarily achieve this aspiration.	The housing chapter of the plan (Chapter 8) provides further detail on the application of policies relating to special housing needs. The policy will be reviewed (as necessary) to address the point made.
1665	Mrs Gillian Poulter		I am worried about the loss of current amenities and the lack of forward planning to put in place schools and surgeries to accommodate the large increase in families using the already overstretched infrastructure.	The Local Plan will be accompanied by an up-to-date Infrastructure Delivery Plan when it is published for consultation in the summer of 2020. The IDP will outline the need for schools and health services and how such needed will be met through development.
1669	Mrs Gillian Poulter		There is no mention of inbuilt requirements for downsizing opportunities for the elderly; special amenities for disabled, and lack of thought for young parents with small children in blocks that would ultimately rely on a lift for reaching the level they	Policy 33 considers the issue of downsizing and sets out the policy approach that will apply. Other policies of the plan seek to ensure the provision of facilities for elderly and other disadvantaged groups of society. It is proposed to include a separate policy on 'access for all' recognising the needs of

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Policy 4: Ensuring Good Growth				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			live. I feel the plan, if implemented would come with built in social problems such over development creates.	vulnerable people and ensuring that development proposals do not result in adverse conditions for some community groups. The final version of the plan will be supported by an Equality Impact Assessment.
1673	Kevin King		***IN AGREEMENT WITH HPPG LETTER*** I am concerned about the lack of engagement with the Highams Park Planning Group in advance of the plans being developed - this seems to be completely at odds with the idea of community engagement and is concerning. I would also like to see explicit reference made to the redevelopment of the cinema at the Regal - an odd omission given various statements of support from the council. Highams Park residents often feel plans affecting the area are made without the involvement or engagement of the people that live there. This needs to happen in a more effective and meaningful way.	These comments are noted and our response will form part of our comments on the HPPG Letter.
2139	anonymous response form 1		Support for local people to remain in the area	It is not clear what kind of support is being requested. However, the plan includes a range of policies intended to improve local conditions with regard to housing, employment, leisure social and community infrastructure etc intended to encourage people to remain in the borough.
2212	Lucy Read	Planning Advisor, Sustainable Places Environment Agency	Encouraged to see environmental objectives for the borough have been considered in ensuring good growth and development although these should be reworked to incorporate key examples: Point G expects examples of adaptation to be detailed including flood resilience measures, water efficiencies and flood risk management. Point H Water environment needs to include rivers, streams, ditches, ponds and lakes and all wetland habitats included within this point to ensure adequate protection and enhancement. There also needs to be reference to the principle of NET ENVIRONMENTAL GAIN.	The point made about the principle of 'net environmental gain' is noted for consideration.

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Policy 4: Ensuring Good Growth				
ID	Full Name	Organisation	Comment	Council (Officers) Response
2653	Mrs Sarah Sanders	Committee Member DADRA	Policy 4 - Ensuring good growth: Point 4.31: "Schools, health care facilities, shops and other services need to be available in accessible locations along with parks, sports facilities and well-maintained local public open space, forming part of a wider 'green infrastructure network' threading through the borough to adjoining Boroughs and linking to the open countryside and Epping Forest beyond." These points are important to the local residents, and as the area is already over-stretched, we cannot see how the Sewardstone Road Neighbourhood centre and the current infrastructure available for schooling, transport, and healthcare can support the addition of 450 new homes.	The Local Plan will be supported by an Infrastructure Delivery Plan, which will set out details of the borough's infrastructure requirements. This document will set out what is needed, where it is needed and when it is needed. This document will be published with the final version of the plan.

Policy 5: Encouraging Mixed Use Development and Intensification				
ID	Full Name	Organisation	Comment	Council (Officers) Response
668	Mr Peter O Kane		The factors identified in Policy 5 as to what criteria should be used in assessing what is appropriate are very vague and seem potentially arbitrary. For instance, it is unclear what a borough Arrival Point is or why it is relevant to densification.	Paragraphs 4.36 - 4.37 set out the policy approach on density and intensification. For better clarity and interpretation, it is proposed to amend this policy to provide further guidance.
669	Mr Peter O Kane		3. The inclusion of Designated Centres and Strategic Locations comes across as these are places where we the Council will allow greater densification because they are areas where the Council have chosen to allow greater densification.	The explanatory text to Policy 3 sets (paragraphs 4.12 to 4.16) sets the out basis for identifying growth areas. The main consideration is the opportunity to optimise connectivity and access to jobs at the most sustainable locations - in accordance with national planning policy and London Plan policies.
671	Mr Peter O Kane		I would be concerned that the Council has been too lax in the past at allowing very high-density plans to go forward. For instance the proposals for the Montague Road Estate (Fred Wigg and John Walsh Towers in Leytonstone) which the borough was promoting for three years until 2018 envisaged densities of over 1,000 hra in any area of largely terraced housing with densities of under 400 hra. [The scheme was	In practice, development proposals are considered in accordance with the development plan. The emerging Local Plan contains policies to guide decisions on high density developments. In particular, see policy 5 (Approach to Intensification and Density) Policy 32 (Delivering High Quality Design and Policy 63 (Taller Buildings). The proposed

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Policy 5: Encouraging Mixed Use Development and Intensification				
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			dropped because of developer opposition post Grenfell, not any noticeable change of heart by the Council.]	redevelopment of Montague Road Estate (Fred Wigg and John Walsh Towers) was dropped for financial reasons.
1059	Ms Alison Blom-Cooper	Planning Department Epping Forest District Council	Key Diagram. It would be helpful if the key diagram on page 27 included reference to the EFSAC. It may be that the light green shaded area is contiguous with the EFSAC boundary but there is no reference to this shaded area in the key.	This point is noted for consideration. A full listing of all designations is mentioned elsewhere under the thematic policies of the plan. The policies map shows all of these designations.
1121	Stagecoach		This approach is supported by Stagecoach and consider the proposed approach to intensification of development to be sensible.	The Council notes the statement of support provided regarding the approach to intensification as stated under Policy 5.
1145	Blackrock and NEAT Development		New Local Plan Policy 5 'Encouraging Mixed Use Development and Intensification' addresses this further, and we support its approach in encouraging mixed use development within the strategic locations.	The Council notes the statement of support provided regarding Policy 5.
1146	Blackrock and NEAT Development		We support the assertion that areas of transformation should benefit from high transport accessibility. However, in our view the wording of Part K could arguably preclude already well connected areas of the borough where there is a limited need for significant infrastructure investment due to existing or current improvements. As such it is suggested part K of the policy is reworded as follows: "Transformation: applicable to sites/areas with a fragmented urban grain, where a transformation of existing character can be justified to deliver substantially more development. Sites suitable for such development will be the strategic locations with high public transport accessibility and/or significant other planned infrastructure investment."	The Council notes the suggested change. It is proposed to amend the wording of Policy 5 (k) to read as follows: "Transformation: applicable to sites/areas with a fragmented urban grain, where a transformation of existing character can be justified to deliver substantially more development. Sites suitable for such development will be the strategic locations with high public transport accessibility and/or significant other planned infrastructure investment."
1218	Rosie Sterry	Transport for London - Commercial Development	TfL CD support the borough's approach to mixed-use development and intensification and agree that in order to accommodate the higher growth required this must accelerate as set out in supporting text Paragraph 4.33. We agree that	The Council notes TfL's support and agreement on the text of included under Policy 5, part K of the draft Plan.

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			taking all opportunities to intensify development on sites with "high public transport accessibility and significant other planned infrastructure investment" (Policy 5, part K) is integral to supporting sustainable development across the borough.	
1219	Rosie Sterry	Transport for London - Commercial Development	The policy could specify the opportunity to co-locate residential led development and transport infrastructure uses to ensure that growth takes place in locations with good levels of accessibility. In line with policy H1 of the DLP, the policy could reference that development should be optimised within 800m of a transport interchange or town centre.	Noted for consideration. The Council will publish any amendments in the updated Local Plan which is expected to be published for consultation in Autumn 2020.
1392	Jennefer Peters	Senior Strategic Planner, London Plan Team Greater London Authority	The floor area ratio approach referred to in Policy 5 of WF's draft Local Plan should be crafted to ensure that it does not conflict with the approach set out in draft new London Plan Policy D1B which seeks to optimise site capacity through the design-led approach.	As explained in Paragraph 4.63 of the plan, the application of the floor ratio approach seeks to complement the measure of residential unit density. It compares the total floor area of a building or collection of buildings to site area and is considered useful for its ability to capture densities in mixed use developments, as it includes all floor area instead of simply residential uses. It does not conflict with the new London Plan policy approach.
1421	Carey Benn		Adding 5 story housing around the station, will irreparably change HP. We should encourage development and brown field sites - but it must be empathetic to the area and balance residential with commercial and retail.	The plan contains a range of policies to guide the transformation of local areas, also ensuring that the character of local areas is protected as much as possible.
1443	Colin Setchfield	The Parish Church of Saint Edmund	Development suitable for intensification and density is seen as at locations "with high public transport accessibility". In its past Strategic Infrastructure Plan (Transport Infrastructure Needs), LBWF acknowledged that "there is a well-structured public transport network covering the whole of the borough, the greater proportion of the 'moderate' to 'very good' and the one 'excellent' PTAL ratings are to be found within the southern half of the borough, whilst in the northern half of the borough, the PTAL ratings are predominantly 'poor' to 'very poor'." The transport provision in this part of the borough has not	The Local Plan will be supported by an Infrastructure Delivery Plan, which will set out details of the borough's infrastructure requirements. This document will set out what is needed, where it is needed and when it is needed. This document will be published with the final version of the plan.

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			significantly changed since that plan. LBWF acknowledges, in its 2018 Growth and Investment Strategy, public transport provision which is “not good enough in terms of access, regularity or reliability of services”. This same strategy highlights that public transport capacity encourages car use, but its priority projects target Walthamstow, Leyton, and those areas already served with railway stations. The current draft Local Plan also acknowledges that “Chingford and Highams Park is generally less accessible than the south and central areas of the borough”, and that Chingford Mount is accessible only by road and bus.	
1444	Colin Setchfield	The Parish Church of Saint Edmund	Chingford Mount is 1.5 miles from Highams Park Station, 2 miles from Angel Road station, 2.5 miles from Chingford Station, 3 miles from Walthamstow Central Station/Blackhorse Road Station. In view of these distances, what additional public transport provision does LBWF plan to support the increased population?	The Local Plan will be supported by an Infrastructure Delivery Plan, which will set out details of the borough's infrastructure requirements. This document will set out what is needed, where it is needed and when it is needed. This document will be published with the final version of the plan.
1463	Ms Hanna Chalmers		Most Londoners and people living in Highams Park understand the need for more housing - there are opportunities as outlined in this letter from the HPPG to build more housing without losing the distinct assets and local character of the area that we have here and the one civic space we have in Highams Park - the purpose built, recently refurbished and incredibly well utilised library.	The plan contains policies to guide development proposals ensuring that local character is protected. There are no proposals in the draft Local Plan to demolish the library.
1484	Sharlene Sarolli		In particular, I am most concerned about the local schools, GPS and parking. These are already under pressure and this plan will add to the already strained recourses.	The plan contains a range of policies to guide the transformation of local areas, whilst also protecting green spaces and providing supporting infrastructure. The Local Plan will be supported by an Infrastructure Delivery Plan, which will set out details of the borough's infrastructure requirements. This document will set out what is needed, where it is needed and when it is needed. This document will be published with the final version of the plan.

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1582	Mr Matthew Robinson		Policy 5 ("Encouraging Mixed Use Development and Intensification") - which encourages mixed-use development and intensification in Strategic Locations, particularly in areas with high accessibility and planned infrastructure investment. The ability to bring forward "transformational" densities of 250-450+ dwellings per hectare in these locations (equivalent to Inner/Central London) is supported.	The Council notes the statement of support provided regarding Policy 5 of the draft plan.
1653	Emily Grant		What I and many others do not understand is how yourself and members of the council can file to create several thousands of homes in Waltham Forest, when there's little space and too much demand here already.	In accommodating growth, the plan encourages intensification of development and supports the principle of mixed-use development. It seeks to encourage the development of building types that more efficiently use existing urban space and services.
1656	Christine Lewington		Overcrowding of existing residential areas impacting the character of the local area - the proposed number of new homes is too high to not change the current character quite significantly. The unique village feel of Highams Park is one of the key reasons why residents moved here (including myself) and contributes fundamentally to a high community engagement and spirit.	The Council notes the concern expressed regarding the proposed level of housing growth in Highams Park and indeed throughout the borough. The plan contains a range of policies to guide the management of change in local areas, also ensuring that local character is safeguarded.
1657	Christine Lewington		Adding of more housing without providing additional infrastructure (such as GP services, parking etc).	Policy 2 seeks to ensure the provision of supporting physical, social and green infrastructure provision commensurate with the scale of growth. It states that planning permission will only be granted for new development if it can be demonstrated that there is, or will be, sufficient infrastructure capacity to support and meet growth requirements.
1658	Christine Lewington		Disagree with the redevelopment of Highams Park station - the unique character of Highams Park station is central to the village feel of Highams Park and constitutes the core of the area.	The plan does not contain proposals to redevelop Highams Park Station.
1663	Mrs Gillian Poulter		I have many concerns regarding the scale, and insinuated redevelopment proposals. There seems an emphasis on keeping the character of each of the areas, and yet the possible	It is recognised that intensification could be associated with concerns about new development becoming inappropriate to their context and destroying much of what people see as

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			outcome of your document, particularly in the Highams Park area of the Northern Plan would completely change the community that currently flourishes there and the overall character of what is a unique town centre.	valuable in their daily living environments. However, if well managed intensification could provide positive benefits to improve the quality of local environments. The plan contains a range of policies to guide the redevelopment of sites/areas whilst prioritising the protection of local character.
1708	Roy Killick		I would like to state that I support the comments on the draft local plan, sent to you by the Highams Park Planning group. I do not agree with more housing in the small Highams Park Area.	These comments are noted, and our response will form part of our comments on the HPPG Letter.
1725	London and Quadrant (L&Q)	Director	L&Q support the revised approach to mixed use development, intensification and density on appropriate sites within DLP Policy 5 (Encouraging Mixed Use and Intensification), and approach to tall buildings in appropriate locations (DLP Policy 63 - Taller Buildings).	The Council notes the statement of support provided regarding Policy 5.
1736	Wanis Ltd	Wanis Ltd	Wanis fully supports the Council's objectives to secure genuinely mixed-use development through intensification of existing sites that deliver the 'right forms' of intensification in the 'right locations'.	The Council notes the statement of support provided regarding the approach to intensification.
1738	Wanis Ltd	Wanis Ltd	The Wanis site has the sustainable credentials to meet these wider objectives, with the site located in very close proximity to Lea Bridge railway station and existing residential communities to the east. The site is already well served by infrastructure and its wider context is conducive to delivering intensified mixed use development. The Council's open support for intensification will provide confidence to the market to engage in what can often be expensive and challenging mixed use development projects.	The Council notes the statement of support provided regarding the approach to intensification.
1741	Wanis Ltd	Wanis Ltd	Supports general approach of clause A to H of part 1 of policy 5 in relation to mixed used development	The Council notes the statement of support provided regarding clause A to H of part 1 of policy 5.
1742	Wanis Ltd	Wanis Ltd	There needs to be a wider recognition that intensified mixed use development is often complex, more costly to deliver compared to standard housing products and is therefore more	Noted for consideration.

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			challenging in viability terms. The policy needs to recognise that it may not be feasible for complex collated schemes to meet all policy requirements in all circumstances, and that the Council will apply a flexible approach on a case by case basis.	
1745	Wanis Ltd	Wanis Ltd	Part K The principle of 'transformational' change for employment and housing schemes in strategic locations such as Lea Bridge as outlined in part (K) of the policy is strongly supported.	The Council notes the statement of support provided.
1746	Wanis Ltd	Wanis Ltd	Part K - The final paragraph of the policy requires that 'development proposals must be informed by an assessment of the site's immediate context...'. The policy needs to explicitly recognise that in promoting transformational change to an area's existing character, schemes that diverge from the overriding character will be supported where it can be demonstrated that a high-quality development is proposed.	The last sentence of Paragraph 4.36 addresses density considerations, which is one of a number of other factors (including the quality of the development) normally taken into account in assessing the merits of a scheme. The plan gives emphasis to quality considerations through a range of policies. Accordingly, no change to Policy 5(K) or Paragraph 4.36 is considered necessary.
1747	Wanis Ltd	Wanis Ltd	Paragraph 4.32 Wanis has undertaken its own feasibility work looking at co-location of employment and residential uses onsite, and supports the range of 4.0-5.0+ FAR and 250 -450 + dph in transformational areas, located close to public transport.	The Council notes the statement of support provided regarding the information provided in Table 4.1, in particular, relating to areas in transformation.
1749	Wanis Ltd	Wanis Ltd	Table 4.3 Both the FAR and density and metric do not need to contain an upper range number with other policies controlling the maximum scale of development. Amend the table to say up to 4.0 - 5.0 + and 250 - 450+.	As guide, the Council considers it necessary to provide a range between an upper and lower figure.
1752	Mark Wiltshire		The 'squeezing' in of housing, creating housing that is too close together with no space, creates massive social problems.	The draft Local Plan contains a range of policies to guide growth and change and to ensure that new development is carried out in harmony with its setting and makes a positive contribution to the local environment. See Policy 5 (Approach to Intensification and Policy 62 (High Quality Design) and Policy 63 (Tall Buildings). Other policies also consider amenity and other issues relating to local character. All of these policies are considered in decision making, ensuring that an appropriate

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				balance is maintained between competing objectives and that new development is sensitively designed.
1753	Mark Wiltshire		Target of 450 new homes is too high, it will destroy the character of the area.	This point is noted for consideration, also mindful of the reduction of the Council's housing target in the emerging London Plan.
1767	Wendy Mathers-Ford		I would be grateful if you could take the attached Higham Park Planning Group document into account as representing my views in relation to the recent consultation. In summary my concern is predominantly that the Highams Park and South Chingford areas fundamentally lack the infrastructure to cope with several hundred new houses in particular the availability of school places, nursery places, doctors and dentists. Moreover, high-density living is out of character with the existing housing stock.	Please see response to HPPG (Gordon Turpin). The Local Plan will be supported by an Infrastructure Delivery Plan, which will set out details of the borough's infrastructure requirements. This document will set out what is needed, where it is needed and when it is needed. It will also set out the delivery mechanism to ensure the timely delivery of infrastructure. This document will be published with the final version of the plan. Policy 2(c) makes clear that planning permission will only be granted for new development if it can be demonstrated that there is, or will be, sufficient infrastructure capacity to support and meet growth requirements.
1793	Mr Thomas L'Estrange		I am particularly concerned about the level of additional housing proposed. The addition of an extra 450 homes/housing units close to the centre will drastically alter the 'feel' of Higham Park. Whilst I appreciate the need for housing, I do not see that this should be provided in areas where the local schools are already full with no room for further expansion, where parking is already a major problem and doctors' surgeries are already oversubscribed. What also saddens me is that I feel far from certain that the Council will take in to account the views of the Highams Park residents. As a prime example, the local opposition to the Tesco development was ignored when the size of the Section 106 money was realised. I am not aware that any of it was spent in Highams Park.	It is recognised that intensification could be associated with concerns about new development becoming inappropriate to their context and destroying much of what people see as valuable in their daily living environments. However, if well managed intensification could provide positive benefits to improve the quality of local environments. The plan contains a range of policies to guide the redevelopment of sites/areas whilst prioritising the protection of local character.

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1797	Deborah Taylor		As a local resident of nearly 30 years, I share many of the concerns expressed in the letter. It is impossible to escape the feeling that the council is intending to shoehorn a huge number of dwellings into Highams Park without due regard to local sentiment and with as little public consultation as possible. An additional 450 homes within half a mile of Highams Park station is far too many. Development on this scale would irreparably damage the character of the area, to a say nothing of the pressure on local schools, GP surgeries and the roads which are already heavily congested at peak times.	It is recognised that intensification could be associated with concerns about new development becoming inappropriate to their context and destroying much of what people see as valuable in their daily living environments. However, if well managed intensification could provide positive benefits to improve the quality of local environments. The plan contains a range of policies to guide the redevelopment of sites/areas whilst prioritising the protection of local character.
1868	Miss Susan Murray		What worries all residents (as was evident from last night's Ward meeting) is that you seem to be bending over backwards to let developers into our area but don't seem to have any sway or interest in infrastructure. Where will their children go to school? Is there REALLY to be no parking for them? Can you assure us that you will put in place the things that a community needs in order to run smoothly? We will need more buses but the 48 has just been killed off.	The Local Plan will be supported by an Infrastructure Delivery Plan, which will set out details of the borough's infrastructure requirements. This document will set out what is needed, where it is needed and when it is needed. This document will be published with the final version of the plan. Policy 2(c) makes clear that planning permission will only be granted for new development if it can be demonstrated that there is, or will be, sufficient infrastructure capacity to support and meet growth requirements.
1893	Sue Crisp		The meeting I attended at St. Peter's and Paul church told local people nothing and any rumoured plans just answered by there is no planning permission in place. Then expect the residents to reply to the plans literally no information of what is planned. A simpler plan would be to build more housing in places like Harlow which have large areas of land unused with good transport links. Leave Waltham Forest alone it is already full!	The Council is preparing an additional Local Plan document on site specific allocations. This will provide opportunity to apply the policies of the plan on specific sites, providing more details on how new developments could be integrated within existing local areas. The Local Plan will be supported by an Infrastructure Delivery Plan, which will set out details of the borough's infrastructure requirements. This document will set out what is needed, where it is needed and when it is needed. This document will be published with the final version of the plan. Policy 2(c) makes clear that planning permission will only be granted for new development if it can be demonstrated that there is, or will be, sufficient infrastructure capacity to support and meet growth requirements.

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1968	Dr Robert Gay		I am in general uneasy about mixed use development. It is well known that mortgage lenders are reluctant to lend on flats above shops, and there are difficulties with noise, odour etc with flats above restaurants, pubs, etc. (See also below about the need for some place to accommodate 'bad neighbour' leisure uses.) It is better to have areas for residential development which are only for residential use	Policy 5 of the draft plan recognises the issue associated with conflicting uses and bad neighbour developments and accordingly sets a policy approach to manage this. The policy sets out the factors to be considered in making decisions on the mix of uses.
1970	Ms Rosa Ruggieri		Building new flats in an already small and congested area, will not be for those most in need, as we have seen time and time again, it will be to the highest bidder and who will make the most profit for the borough. Within the last week I had a letter from a developer on behalf of Care Homes who are planning to purchase land to be build a care home along Sewardstone Road. I presume this will be granted.	The plan seeks to provide a broad range of housing choice by size and tenure including genuinely affordable housing. The policy approach to deliver affordable housing is set out under Policy 24 of the draft Plan.
1972	Dr Robert Gay		I understand from what was said by Planning personnel at the meeting that in fact the Council intends to resist small light industrial and similar uses (garages, etc) in residential areas.	The plan policies seek to encourage business growth including the small and medium sized enterprises in the most appropriate locations.
2009	Dr Robert Gay		I am in general uneasy about mixed-use development. It is well known that mortgage lenders are reluctant to lend on flats above shops, and there are difficulties with noise, odour etc with flats above restaurants, pubs, etc. It is better to have areas for residential development which are only for residential use. I understand from what was said by Planning personnel at the meeting that in fact the Council intends to resist small light industrial and similar uses (garages, etc) in residential areas.	In accommodating growth, the plan supports the principle of mixed-use development. It is considered that developing a mix of uses on individual sites and across an area can be beneficial in a number of ways, such as reducing the need to travel between homes, jobs and services, providing a range of activities through the day, and so increasing community, safety and security. It can also contribute to the creation of areas that are diverse, distinctive and successful, allowing an efficient use of land, with other uses developed above those uses which need direct ground floor access or a street-level frontage, such as shops and providing more opportunities for the development of housing and employment. On this basis the principle of mixed use is accepted on policy grounds. However, to ensure an appropriate mix of uses, Policy 5 also sets out the criteria for

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				considering the degree of mix and the appropriate mix of uses considered acceptable.
2074	Mike Sparrow		The area of Chingford, especially North Chingford which encompasses this part of Sewardstone is a nice, green part of the borough. People will move here for that reason alone. Young people after some years of living near a Tube station, in a high rise, high-density area might then have a family and wish to move to a less 'urban', slightly less busy and greener town, such as Chingford. However, if the council starts building, or 'enhancing' as you put it, with one estimate I read as being 450 homes near Sewardstone alone, then the area will lose that appeal and it just becomes just another densely populated, urban style part of the borough, rather than a beautiful town on the edge of Epping Forest.	The plan contains a range of policies to guide the redevelopment of local areas, whilst also protecting local character. All of these policies will be considered in decision making, ensuring that an appropriate balance is maintained, and problems minimised.
2256		St William Homes LLP	St William support the approach (Policy 5) to the "transformation" of sites suitable for such development in the Strategic Locations with high public transport accessibility and significant other planned infrastructure investment. We agree with supporting text 4.37 that the use of the Floor Area Ratio (FAR) should only be used as "a general approach". It should not be applied mechanistically as set out in the London Housing SPG 2016.	The Council notes the statement of support provided regarding Policy 5.
2450	Aviva Investors	Aviva UK Central Services	Aviva considers and supports the Leyton Mills site as falling within a "transformation" area where high dwellings per hectare are to be secured. Aviva also considers the Leyton Mills area to be suitable to accommodate tall buildings.	The Council notes the support of the policy principles set out under Policy 5. With regard to the site-specific references made, the Council is preparing an additional Local Plan document on site specific allocations. This will provide opportunity to apply the policy principles of the plan to specific sites, providing more details on how new developments could be integrated within existing local areas.

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2488	London Hotel Group	London Hotel Group	We note that the Council's Policies 62 and 63 seek to ensure that high quality design should be at the forefront of the approach to development proposals, and that appropriate intensification should take place in accordance with Policy 5, and that taller buildings will be assessed in line with the Characterisation and Intensification Study. In the first instance, Policy 5 (A - H) includes a series of other criteria that mixed-use development should be considered alongside criteria I - K	This pointed is noted.
2490	London Hotel Group	London Hotel Group	We believe that the spatial characteristics of the Site, i.e. a corner site along Lea Bridge Road, with a high PTAL, close to Leyton Midland Overground station, close to the Baker Arms Centre and in an area which will be subject to significant strategic change, allows a comprehensive intensification of the Site which allows the delivery of uses to be optimised. Indeed, additional massing is appropriate in this location to allow for a transformation of character that is sought by the Local Plan.	The Council notes that this point refers to a site-specific proposal not included in the draft Local Plan. The Council is preparing an additional Local Plan document on site specific allocations. This will provide opportunity to apply the policies of the plan on specific sites.
2491	London Hotel Group	London Hotel Group	We note that the Council's Policy 5 includes a series of criteria to assess the suitability of mixed use developments, and where intensification and additional density can be achieved. We believe that this flexibility and criteria within the Policy (and those others used to assess development suitability) is key to ensuring that the Council meets its strategic objectives. Our client is therefore supportive of the objectives of the Local Plan and the strategic aspirations for the nearby District Centre, the Strategic Location and for the wider borough. Furthermore, we are confident that any redevelopment proposals can meet the criteria within the detailed Policies. We believe that the mixed use intensification of the site can assist the Council in meeting their strategic objectives.	Noted. Support welcomed.
2495	London Hotel Group	London Hotel Group	We note that the Council's emerging Policy 5 'Encouraging Mixed Use Development and Intensification' sets out the Council's challenge to ensure that the "right forms of	The Council notes the statement of support provided regarding Policy 5.

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Policy 5: Encouraging Mixed Use Development and Intensification				
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			intensification occur at the “right locations”. We believe that the robust assessment strategy adopted in the Study will ensure that this occurs.	
2496	London Hotel Group	London Hotel Group	The post-amble to Policy 5, at para. 4.36 states that ‘the precise density for any individual site will be determined by its immediate context, on-site constraints, the type of development proposed and the need to provide an appropriate mix of dwellings or employment units to meet the community’s needs’. This Policy also includes a commentary on the other considerations, alongside those in criteria I - K which would form part of the Council’s assessment. In combination, the assessment criteria with the stated Policy, and the criteria within the Study (which forms the evidence base for the stated Policy) will assist achieving the objectives of Policy 62 (A) - (R) ‘Delivering High-Quality Design’, whilst ensuring that taller buildings are correct for their location, in accordance with the criteria in Policy 63 (A) - (K). The approach adopted similarly complies with the objectives of the draft London Plan (2019), in seeking to build strong and inclusive communities (Policy GG1), and ensuring that development makes the best use of land (Policy GG2). A common thread therefore exist to the objectives of Chapter 11 of the NPPF (2019).	Support noted.
2497	London Hotel Group	London Hotel Group	In combination, the assessment criteria with the stated Policy, and the criteria within the Study (which forms the evidence base for the stated Policy) will assist achieving the objectives of Policy 62 (A) - (R) ‘Delivering High-Quality Design’, whilst ensuring that taller buildings are correct for their location, in accordance with the criteria in Policy 63 (A) - (K). The approach adopted similarly complies with the objectives of the draft London Plan (2019), in seeking to build strong and inclusive communities (Policy GG1), and ensuring that development makes the best use of land (Policy GG2). A common thread	Support noted.

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Policy 5: Encouraging Mixed Use Development and Intensification				
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			therefore exist to the objectives of Chapter 11 of the NPPF (2019).	
2500	London Hotel Group	London Hotel Group	In respect of the compliance with the NPPF, Chapter 12 requires 'development plans to set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable'. We believe that the clarity provided by the Study as an Evidence Base document will provide the clear background to the above-mentioned detailed design policies with the draft Local Plan.	Support noted.
2503	Miss Victoria Manston	Berkeley Homes North East London	Given the increased housing targets across London, and as set out in Policy 5, we support the Council's approach to identifying strategic sites in key growth locations which have the capacity to deliver high-density mixed-use developments.	The Council notes the statement of support provided on Policy 5.
2504	Miss Victoria Manston	Berkeley Homes North East London	We agree that the delivery of large-scale development projects should be in sustainable locations with high public transport accessibility.	The Council notes the statement of support provided.
2505	Miss Victoria Manston	Berkeley Homes North East London	Berkeley Homes supports the borough in their ambition to deliver truly mixed-use, high-quality developments to bring together existing and new communities and create vibrant and quality places.	The Council notes the statement of support provided.
2656	Dr Robert Gay		I would question whether it can be appropriate to build tower blocks (by which I mean above about 6 storeys) in Leytonstone Town Centre. They would obviously be out of keeping in the High Road. In the small area of the Town Centre (as shown on the map displayed at the Epicentre, coloured in dark blue) which is away from the High Road, it would not be appropriate to build tower blocks by Leytonstone Tube station, directly by St John's Church and churchyard. In my view, it would not be suitable to encourage large residential development right by a Tube line which is above ground and now runs at night two nights a week, and right above an above ground Tube station	The Council notes the concern expressed about the policy on intensification and its likely implications. If well managed intensification could provide positive benefits to improve the quality of local environments. The plan contains a range of policies to guide the transformation of local areas including building height. All of these policies would be considered in decision making, ensuring that an appropriate balance is maintained, and problems minimised.

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			which runs all night two nights a week, and also is in regular use as a point of entry for work teams other nights. Those who live in the development on Kirkdale Road, between the Matalan car park and Kirkdale Road, have no green space near them other than the churchyard, which is consecrated ground and is fenced off on their side. It is not desirable that there should be other developments with no private green space (individual or communal) and no easy access to public green space.	
2679	Mrs Claire Ford		In regards to North Chingford - Station Road, no height restriction on new build or local design considerations is given. Need to ensure development fits the existing historic environment.	The Council is preparing an additional Local Plan document on site specific allocations. This will provide opportunity to apply the policies of the plan on specific sites, providing more details on how new developments could be integrated within existing local areas.

Chapter 5: South Waltham Forest				
ID	Full Name	Organisation	Comment	Council (Officers) Response
2	Mrs Anneka White-Steele		Lea Bridge library is such a great but neglected/underused local space and could be developed into a really great community asset/hub. The kids groups are upstairs in a really grotty room and the spaces of the library not utilised. Could be redesigned so that a cafe is added onto the back of the library where the kids corner is and extended into Friendship gardens. This bit of green space is derelict and not used by anyone and doesn't feel very safe. This could be totally transformed into a really lovely green space which is much needed on Lea Bridge Rd with cafe tables in the garden too. It would also provide opportunity for a new local business for whoever runs the cafe (maybe a small local company like Curved Brick Coffee, Deeneys or Kuukaloo). This would create a great family friendly space where it is really needed in Lea bridge. It could then be used by different	Noted for consideration. The strategic policy for South Waltham Forest sets out the Councils priorities in placemaking for the south of the borough in relation to Lea Bridge, Leyton, Leytonstone and Bakers Arms. These include the delivery of sustainable neighbourhoods which build upon area character, public realm and green assets to provide accessible streets for all to increase the permeability and connectivity of the area. The Local Plan has specific policies on social infrastructure, which includes libraries.

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ID	Full Name	Organisation	Comment	Council (Officers) Response
			<p>community groups too to hold classes etc in a nicer environment. Charities like Migrateful could also use the cafe in the evenings for their classes making the space diverse and reaching all social groups. eg. look at Farewell cafe in N16. The 'wetlands walk' proposed should be accessible to everyone.</p> <p>There is a great opportunity to make the bridge over the railway tracks and Orient way between Jubilee park and Hackney marshes accessible so that more people can enjoy the green space and area. Just installing a ramp and a slightly clearer path could benefit so many people to have direct access to a whole new green space and link both boroughs so that more people from other areas could also enjoy the space. Also a priority to get green spaces really used, so many small parks eg. Friendship garden, Cambrian garden around that aren't used and are neglected. Would be great to transform them more into spaces like Hoxton Community gardens. These could also be promoted as green community hubs which are so necessary with an increasing population and people living in flats. Used by all of the community and hold events there and could also make it a space for hire on some evenings to generate revenue to upkeep them.</p>	
7	Mr Frederick Smith		Seems like a lot of homes to accommodate, but the aims of enhancing the area at the same time sound good.	The housing target is based on needing to meet future housing need set out in the SHMA. This has established a housing need of 1,810 new homes. The approach to delivering these homes is to be character led with a focus on place making and design quality to ensure that new development enhances the borough.
13	Mr Sulaman Sarkar		Increased population as a result of new housing will bring more congestion and a strain on already over stretched services e.g. doctors, schools, hospitals, etc.	The Council is working on an Infrastructure Delivery Plan alongside the Local Plan which will set out how existing will be improved to support new housing and jobs, as well as setting out what new infrastructure is required to support these uses too.

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ID	Full Name	Organisation	Comment	Council (Officers) Response
14	Ms Alison Mason		<p>Leytonstone is my particular area of interest. The High Street is dying post Tesco, we have very few independent businesses (due no doubt to high business rates), landlords would on the face of it rather have empty properties. The fiasco with Eat17 is a case in point, now another empty shopfront with rough sleepers, to join the other empty shops in the High Street. If the plan is to encourage the building of even more small flats destined for gouging landlords, that will kill off the High Street completely. You have a large middle class population in Leytonstone who see the odd independent (baker, coffee shop, all singular) but can't buy any fruit and vegetables, use a butchers or buy any food other than in Tesco. There is a depressing lack of choice for the consumer in Leytonstone; in fact all the money and resources in the borough seem to have been spent on regeneration in Walthamstow and Leyton, Leytonstone seems to be coming a very poor third, especially as it's the second largest town centre in the borough? In retrospect the one way system was a big mistake, it's created a Tesco centred line of traffic with very little to offer the rest of the town centre. Many buildings are ugly (Matalan in particular who seem to have made no effort at all to clean up its High Street entrance which has become another area for rough sleepers, rubbish and general malaise). If there were a way to pedestrianise the High Street from St. John's to Tesco, or even Church Lane, that could encourage cafe pavement society and make the area a nice place to walk, eat/drink and cycle. I can't personally see how this could be done but it would be nice to be able to be a little like Walthamstow!</p>	<p>The Council is addressing the challenges affecting its town centres including Leytonstone in a number of ways such as through the preparation of town centre strategies and other regeneration initiatives</p>
24	Mr Ed de Vroome		<p>St Peters In The Forest needs toilets</p>	<p>The plan contains policies encouraging the provision of supporting social and community facilities in new development - including free publicly accessible toilets. See policies 58 and 85 of the Draft Plan.</p>

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ID	Full Name	Organisation	Comment	Council (Officers) Response
26	Mr Richard Cadman		- There's zero focus on the Cann Hall Area which is really disappointing, it seems to have completely dropped off the grid! - I'd really like a greater emphasis on two things in the Cann Hall Area > i) an extension of the mini-holland scheme to Cann Hall Road and Dames Road, and greater traffic control on Odessa/Trumpington/Thorpe/Ramsay/Huddlestone roads.. ii) further investment in the Sheridan Road and Winchelsea Road arches, to make this area a lively and exciting place to start a business	South Leytonstone includes the Cann Hall area, but the comment is noted and further consideration will be taken to ensure the Cann Hall area is better represented in the Local Plan.
27	Mr Oliver Jones		I would like to see some bolder and more visionary objectives in the local plan for Leytonstone. The construction of the A12 in the 1990s was an environmental catastrophe for the area, inflicted by a Tory government. I would like to see the council aiming to cover that motorway and create new green spaces and housing on top of it, working with the Mayor of London, local MPs and environmental and housing campaigners. A great example of what can be achieved is the A7 in Hamburg Altona, Germany: https://naturvation.eu/nbs/hamburg/covering-a7-highway The blight of the A12 and heavy traffic throughout the area results in poor air quality. I would like to see use of moss walls, tree planting, and any other tactics that can be used to reduce harmful particulate pollution.	This is noted for further consideration. However, the idea of building over the A12 would involve significant costs, raising an issue about the deliverability of this project.
28	Mr Peter Carrol		The level traffic on Leyton High Road is unsustainable and pollution levels are very high. Suggest the traffic flow in the Leyton High Road changed to one way to increase space for cycle lane and footways. This will make the road a more attractive business environment and improve residents' health. The level traffic on Leyton High Road is unsustainable and pollution levels are very high. Suggest the traffic flow in the Leyton High Road changed to one way to increase space for cycle lane and footways. This will make the road a more attractive business environment and improve residents' health.	Noted for consideration. The Local Plan Chapter 15 Sustainable Transport and Infrastructure includes policies to encourage a modal shift and support a range of transport options for residents, for example Policy 67 Liveable Neighbourhoods for All.

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			Increased pavement space on the main retail roads would be a huge benefit. Tree planting across south Leyton should also be a priority as it makes the area more attractive for businesses and residents. The pedestrianisation of Francis Road has led to increased traffic in the area around the change. The traffic has especially increased on Leyton Park Road and St Mary's Road westbound since the changes were made. On occasions traffic has been backed up to reach number 37 St Mary's Road, as cars wait to turn into Leyton High Road. It appears that numerous drivers are using the Francis Road to Leyton Park Road and St Mary's Road route as a shortcut instead of using Grove Green Road, which is designed to take a high volumes of traffic. While I am supportive of the Francis Road project, the changes have had a negative effect on neighbouring residential streets. The links for Ruckholt Road cycling and pedestrian paths leading up to the bridge over the railway in both directions, and at the Temple Mills junction are dangerous and need extra investment and reform. They are currently unsafe for cyclists and limit access to the Green Spaces in Hackney Marshes and Olympic Park. The Gateway Road recycling centre smells disgusting and attracts vermin. Part of any Coronation Square plan should include moving this dump to another site, residential housing should not be built metres away from a large rubbish dump.	
33	Sylvia Gullivan	Farishteh Trust	Bakers Arms and Leyton: There are many closed restricted roads which make for difficulty of travelling/parking.	Noted, these restrictions have been implemented by the Highways team and are aimed at encouraging cycling and walking in the borough.
141	Linda Cooke		I think the plan looks very positive.	Support noted.
142	Linda Cooke		Need for step free access onto the Overground as well. There are A LOT of steps at Leytonstone High Road station, making impossible for the elderly, disabled or parents with prams.	Noted, the Local Plan will include a reference to step free access at Leytonstone High Road station.

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			Could this be a part of the improvement works planned for the arches at Leytonstone High Road stat	
146	Anthony Lyons		We also hope that the Draft Plan will continue to focus on community activities in Jubilee Park and supporting local schools on Church Road	Comment noted, the Local Plan seeks to protect infrastructure assets such as schools and parks so that these can continue to serve residents needs including providing spaces for community activities.
151	Diana Hofler		In South WF the plan is for 15k new homes, which is more than North and Central WF combined, and yet 'genuinely affordable housing' is only listed as being a priority in half of the South WF areas (Lea Bridge, Leyton and Whipps Cross, although that last one is reserved for workers). Why are genuinely affordable homes not a priority in Bakers Arms, South Leytonstone or Leytonstone?	Delivering genuinely affordable homes is a priority across the Local Plan for all parts of the borough. The Local Plan will be updated to ensure that this message and objective is clear for all areas.
154	Diana Hofler		Yes to more housing near Leyton Midland Station!	Support noted.
155	Diana Hofler		Yes, please enhance and build up local parks (including Skelton Road urban farm!)	Noted, the Local Plan seeks to protect and enhance green infrastructure assets such as local parks.
156	Diana Hofler		I'm not sure shopfront redesign at the intersection of Lea Bridge Road, Leyton High Road, and Hoe Street is a priority for me?	Noted. The aim of shop front improvements is to support inward investment in the area and support the local centres and make them attractive centres for residents to spend time in and shop at. It can also assist in attracting new retailers to the area.
157	Diana Hofler		It's got a lovely large area in front of the shopfronts on the north corner that could be used better, maybe plant a few more trees?	Noted.
158	Diana Hofler		I like all of the Whipps Cross plan.	Support noted.

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159	Diana Hofler		New pedestrian routes to Epping Forest and Wanstead Flats sounds great!	Support noted.
160	Diana Hofler		Step-free access to Leytonstone station is very much needed.	Noted, increasing the accessibility of public transport is important and supporting the provision of step free access is part of this.
221	Clare Montgomery		Toilet in Hollows Ponds.	Noted. The London Plan Policy S6 Public Toilet has a policy seeking to provide more public toilets as part of new the developments.
222	Clare Montgomery		Picnic benches.	Noted. Whipps Cross is a Strategic Location and public realm improvements will be expected to be deliver as part of any future proposed development.
223	Clare Montgomery		New traffic lights not very good and was better when it had a round about	Noted, However, the Local Plan does not address these sorts of highways issues.
464	Mrs C Toller		Your vision is better than nothing but there needs to be more done. here are some of my suggestions: Can Call Hall get an Overground station? This would open up access to the area as it is quite a distance from Leyton/Leytonstone Tube stations and Maryland and Forest Gate. It would also encourage more visitors to the area and thus improve revenue for local revenue by improving footfall. Hopefully this would encourage more small businesses to open up here.	This comment is noted for further discussion.
479	Mrs Sarah Sanders	Committee Member DADRA	Policy 11: Whipps Cross Strategic Location: "7. Improves public realm and public spaces across the area and walking and cycling accessibility, connectivity, permeability and legibility to and from Whipps Cross Hospital, to Wood Street, Bakers Arms and Leytonstone, as well as other identified routes;" The residents of our area - Sewardstone Road/North Chingford already have little to no public transport access to Whipps Cross Hospital - in the development of the hospital and its connection to the	Noted, improving public transport accessibility to Whipps Cross Hospital is important. TfL is responsible for the public transport network. The Council will include this in its Duty to Cooperate discussions with TfL.

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			surrounding area the provision of suitable transport links must be considered if wishing to reduce the use of private cars.	
492	Mr Julian Cheyne		<p>The Vision is inadequate in that it fails to protect the green spaces in the Lea Valley Park. The Waterworks needs to be retained as MOL and this needs to be make clear in the Plan. In addition, the former Thames Water depot needs to be reintegrated into the Middlesex Filter Beds and retained as a green open space with use of the historic buildings for ecological and educational purposes. The green lung of the Lea Valley needs to be protected and enhanced. The Ice Centre should be removed and put in the Olympic Park. Traffic on Lea Bridge Road needs to be reduced and moving the Ice Centre would help achieve that. Further expansion of facilities like the Riding Centre should also be resisted as increasingly this is becoming a privatised service for better off horse riders from outside the area who use it stable their horses. Its use as a centre for local people should be restored. This will also mean users will be more able to use public transport. The use of the Waterworks for camping and other events should be curtailed. Once again these events draw in traffic. Local use should be encouraged and the cafe developed as an educational centre as originally intended. The vision fails to set out these objectives and refers to vague goals such as good growth. The reality is MOL and Green Belt need to receive specific protections and policies designed to enhance these valuable resources. Small local parks, like the Orient Way pocket park, also need specific protections. They provide important resting places and help reduce pollution. Lea Bridge has a serious pollution problem, which is only likely to increase with the greater number of residences being constructed.</p>	Noted for consideration.

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493	Gardener		Policy 10 (5) talks about 'exploring opportunities for intensification around McDonald's...' This wording is far too weak. The McDonald's site given its town centre location, single story building and extensive surface car parking is outrageously under used. A redevelopment could provide 3/4 storey buildings on the High Road, strengthening existing townscape and contributing to new employment and residential use. Further residential could be provided to the rear. The plan should commit to redevelopment of the site and consult on a detailed brief or site specific work	Noted, the Council will explore opportunities to develop such sites. This includes working on a new Strategic Site Allocations Document. The new London Plan Policy H1 has a general presumption against single use low density retail and leisure parks and states that these developments should be designed to provide a mix of uses including housing in order to make best use of land available for development.
528	Mr Roger Payne		I believe the "pocket park" near Lea Bridge Station, which was a small compensation for the destruction of open green space when the new road was constructed, should not be built on. It is a precious space which provides oxygen, helps clean the air, absorbs excess water and is a haven for wildlife, which will be more needed than ever when all the other planned building in the area is complete.	The Pocket Park on Lea Bridge Station was created following the construction of Orient Way as a relief road, as part of the landscaping scheme. The land is currently designated as Highway land and was previously industrial land. The draft Plan contains policies to manage the loss/replacement of open spaces. See policies 84 and 85.
788	LVRPA	Lee Valley Regional Park Authority	The Area Profile text (after 5.11) should acknowledge these leisure venues, and highlight their contribution to the character of the area and its leisure, cultural and sporting opportunities. The supporting text should reference the Authority's considerable investment in the new Ice Centre on Lea Bridge Road, its popularity as a leisure facility amongst a range of different groups, residents and visitors, and future plans for improving the offer at the Lee Valley Riding Centre and Lee Valley Hockey & Tennis Centre including considering proposals for visitor accommodation.	Noted, the Local Plan will be updated to include leisure venues.
811	Ms Tessa Craig		We support improvements to the public realm and public spaces, walking and cycling accessibility, connectivity, permeability and legibility to the River Lea, and would like to see reference to both the River Lee Navigation and River Lea as we believe intended.	Noted, the Local Plan will be updated to include reference to the River Lea.

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909	Mr Mathew Frith		We support this, but would recommend in the last para that protection of 'high' quality green and open space' is referenced, such as "be defined by their access to a protected network of high quality of green and open space across the South".	Noted for consideration.
910	Mr Mathew Frith		Part J: We welcome and support this.	Support noted.
969	The City of London	The Conservator's of Epping Forest	At 5.4 and Policy 10 (page 39) the Area profile refers to Epping Forest and Wanstead Flats. Wanstead Flats are part of Epping Forest and the profile may read better by commenting 'The east is defined by the grassland Open Spaces of Epping Forest at Leyton and Wanstead Flats, which share a boundary with the London Borough of Redbridge'. Similarly, the Vision for South Waltham Forest does not reference Epping Forest in relation to Open Spaces, particularly given that Leyton Flats is the most highly visited part of Epping Forest with over 440,000 annual visits.	Noted, the area profile will be updated to reflect this.
1148	Blackrock and NEAT Development		As noted above we are broadly supportive of the Council's approach to managing growth through the establishment of three spatial sub-areas and focused strategic locations within each. As such we broadly support the New Local Plan's approach to growth in South Waltham Forest and wish to make no further comments on the policies contained within Chapter 5 of the New Local Plan at this time. However, we reserve the right to make comments on the chapter and policies included within at a later stage in the New Local Plan preparation process.	Broad support noted.
1541	Mark Furnish	Sport England	The policies also contain some aspects of Active Design, for example walking, cycling and public realm improvements, However, Sport England recommend that the policies incorporate all the principles and provided links to the Active Design guidance so that developers/applicants can be informed	This is noted. It is proposed to make reference in the plan to the Active Design guidance.

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			how to 'design in' activity into developments. Achieving well design active places would assist the Council in improving the health and well-being of residents and visitors.	
1596	Bob Bennet		This Policy is to be welcomed but experience suggests the Councils current development management approach to such proposals does not provide sufficient creativity and flexibility.	Noted.
2258		St William Homes LLP	The Vision for the South (page 30) is broadly supported. To comply with Policy 3 and Policy 6, the vision should refer to a "minimum" number of homes, and the reference to these being "genuinely affordable" requires correction as this is a typographical error.	Broad support noted.
2914	Mr Oliver Jones		Building on the successes the council has achieved in Francis Road and Walthamstow Village, in the face of opposition from motorists, I would like to see an ambitious plan to reduce traffic through Church Lane or better, pedestrianise it entirely, rerouting buses back along Kirkdale Rd instead to rejoin Leytonstone High Road. Pedestrianisation here combined with some renovation / redecoration of facades and a market at weekends would transform the town centre. Businesses would be able to extend into the street. The Parisien cafe by the station shows there is demand for outdoor seating all year round when the food and beverage offer is right.	This point is noted for further consideration as part of the preparation of a town centre strategy for all of borough District Centres including Leytonstone.
2915	Mr Oliver Jones		The green space of St Johns churchyard is under-exploited. There are precedents for repurposing and re-landscaping church grounds as public parks and this could make the town centre more attractive. Access could be opened up from Church Lane where the wall and railings stand today. Leytonstone seems to have more parking space than is needed today. Some consolidation of parking spaces on both sides of the underground station and the Matalan car park could release some land for more green space, a play area, or housing.	This point is noted for further consideration to be carried forward through the preparation of a town centre strategy for Leytonstone.

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ID	Full Name	Organisation	Comment	Council (Officers) Response
			Drivers should be incentivised to use public transport instead to reach Leytonstone underground station.	
2916	Mr Oliver Jones		The council's work on improving roads for pedestrians and cyclists has been fantastic but Leyton and Walthamstow have benefited most so far. I would like to see this going further in Leytonstone. To encourage people to cycle we really need long, segregated cycle lanes on all A roads in the borough, especially on arterial routes, just as we now have in Lea Bridge Road. High Road Leytonstone is in need of the Mini Holland approach. This could make it possible for residents to access Crossrail at the Maryland interchange without a car or bus.	This point is noted for further consideration to be taken forward as part of the preparation of a town centre strategy for all of borough District Centres including Leytonstone.
2917	Mr Oliver Jones		The use of St Johns as a music venue is very welcome, but overall Leytonstone feels as though it lacks a cultural focal point, in contrast to Walthamstow which has the William Morris gallery and will soon have an outpost of the Soho Theatre. Leytonstone would benefit from a gallery, a museum, a performance space or other cultural destination. A cinema would make a huge difference to Leytonstone. Given the heritage of Alfred Hitchcock it would be fitting to have one here; and in its heyday Leytonstone boasted at least three. A smaller boutique cinema would be ideal, and would be an alternative to the multiplexes of Stratford and Walthamstow. There are Everyman cinemas in Barnet and Crystal Palace. A Leytonstone location doesn't seem entirely unrealistic.	This point is noted for consideration.
2918	Mr Oliver Jones		I'd like the council to reduce the barriers and costs associated with starting a business, wherever that business would benefit the community and improve the town centre. The area's demographics are slowly changing and working patterns are evolving to include more self-employed people, flexible working, and working at home. There are also many parents with young children during the day.	This point is noted for consideration. The plan makes reference to the Council's Economic Strategy, which seeks to keep, seed and grow businesses in the borough. Policy 67 seeks to broaden the economic base of the borough through the provision of a range of employment spaces. Also, Policy 43 supports the growth of existing and future start-ups, SME's and businesses.

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Chapter 5: South Waltham Forest				
ID	Full Name	Organisation	Comment	Council (Officers) Response
2919	Mr Oliver Jones		Leytonstone would benefit from more cafes and restaurants, co-working spaces and inclusive social spaces. We have too many charity shops, fast food shops and betting shops. Building on the success of the repair cafe, could the council do more to support new businesses or not for profit entities with a mission about sustainability or the public good, for example repair or recycling centres, spaces to combat loneliness for older people, education spaces etc. Finally, I hope I will see the day when both Matalan and McDonald's are bulldozed and new housing and green space can be developed on both sites.	The Council is addressing the challenges affecting its town centres in a number of ways such as through the preparation of town centre strategies and other regeneration initiatives.
2926	Mrs C Toller		The more new businesses that open up in the railway arches (particularly north of Winchelsea Road), the better. As it stands there are many car repair/car wash places which make the area feel dirty and more industrial and make the area feel much less attractive and welcoming to residents.	This comment is noted for further discussion
2927	Mrs C Toller		Can there be an open air lido by Hollow Ponds? This would benefit the whole of Waltham Forest greatly and would encourage more love of the outdoors.	This land lies within the Epping Forest Special Area of Conservation and is owned by the Corporation of London and run by the Conservators of Epping Forest. Whilst this has been raised as a topic there are concerns regarding the impact of recreation on Epping Forest land.
2928	Mrs C Toller		There needs to be more communication with Newham Council as much of South Leytonstone borders Newham. Please consider how many residents in South WF use Forest Gate, Maryland or Stratford as opposed to Leyton station, and this will only increase once Crossrail (eventually) opens. eg - can West Ham cemetery be opened up so pedestrians can walk through there. It would make the walk from Forest Gate to Leyton much nicer for residents/commuters and would make much better use of this lovely outside space.	This is noted as part of the Councils' Duty to Cooperate with both LB Newham and TfL. However part of the land referred to here is out of the London Borough of Waltham Forest boundary.
2929	Mrs C Toller		Please install a safe bike lane on Cann Hall Road to link Wanstead Flats with the Olympic Park. Bike lanes from Drapers	This comment is noted for consideration.

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Chapter 5: South Waltham Forest				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			Fields heading west are superb and as soon you get onto Crownfield Road the roads are extremely hostile for cyclists.	
2930	Mrs C Toller		Please improve the playground on Wanstead Flats by Dames Road - it needs to be improved and would benefit from being more sustainable - it is a very scenic location for a playground and is let down by how run down the playground is, particularly when compared with Henry Reynolds playground.	This comment is noted. However, LBWF do not own or manage this land. Wanstead Flats lies within the Epping Forest Special Area of Conservation and is owned by the Corporation of London and run by the Conservators of Epping Forest.
2931	Mrs C Toller		Jubilee Gardens on Leytonstone High Road is ALWAYS occupied by street drinkers and drug users - it is very intimidating for residents, especially when walking with small children to Langthorne Park. PLEASE do anything you can to discourage street drinking. There were originally plans to turn this into a play space and this has fallen through, much like all the other improvement plans for the South end of Leytonstone High Road.	This comment is noted for further consideration.
2932	Mrs C Toller		Thatched House would benefit from the shutting down of all betting shops which are a blight on the area. More trees are needed and the old toilet block should be transformed into new flats with a cafe or similar underneath.	These comments are noted. However, the Local Plan cannot require the closing down of existing businesses.
2933	Mrs C Toller		What are the plans for schooling and nursery facilities?? Snowberry has sadly just been closed down which is a huge shame. There are many families moving to this area and the waiting lists for nurseries are so long - where are the plans to increase childcare facilities?	The Local Plan will be accompanied by an up to date Infrastructure Delivery Plan when it is published for consultation in the summer of 2020. The IDP will outline the need for schools and health services and how such needed will be met through development.
2934	Mrs C Toller		More bike lanes in general please and anything extra that can be done to discourage cars/pollution and aggressive driving (which is RIFE here). Mini Holland does not seem to have made it down here which is a huge shame as there are many cyclists round here and with kids most people have to cycle on pavements as the road aren't safe enough.	This comment is noted for further consideration through the Local Plan Transport Assessment.

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Chapter 5: South Waltham Forest				
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2935	Mrs C Toller		More residential streets closed off to cars at one end (eg Borthwick Road, alongside Cann Hall Baptist Church) - this area is constantly full of litter, idling drivers and drug dealers lingering as it's a dark, quiet street. It would make a perfect space for a playground/green space if it were closed off to cars between Cann Hall Road and Ramsay Road.	This comment is noted for further consideration through the Local Plan Transport Assessment.
2936	Mrs C Toller		Please don't forget us down here - we very much feel like the forgotten part of the borough as very little improvements seem to happen here! The South of the high road was meant to be improved years ago and we have yet to see it. And please communicate with Newham as there must be a number of improvements that can be made which would benefit both boroughs.	This comment is noted.

Policy 6: South Waltham Forest				
ID	Full Name	Organisation	Comment	Council (Officers) Response
15	Mrs Irena Souroup		I have particular concerns about 2 things: The failure of the document to specify which areas of land are PROTECTED and will NOT be built on. The plan needs to spell out, I believe, which area will definitely NOT be built on. For example: Will ALL of the Low Hall sports ground and cricket ground be guaranteed protection from development? It needs to be. It would be nice to see some guarantees. Also, there needs to be more specific statements and assurances about the building on of sites such as the Waterworks centre and the former golf course. It would be utter folly to destroy these sites by building on them. As the population grows we will desperately need these green spaces.	This comment is noted. The Council recognises the value of green and open space. The next iteration of the Local Plan will be supported by Playing Pitch Strategy which sets the parameters for the protection and enhancement of playing fields; a Green Belt and Metropolitan Land Strategy and a more recent review of it; an Open Space Strategy and a Green and Blue Infrastructure Strategy.
783	LVRPA	Lee Valley Regional Park Authority	The majority of the Authority's venues are located within 'South Waltham Forest' Area, which according to the Local Plan, offers the greatest potential for regeneration and good growth.	Noted. Many authority venues are located in the central area (e.g. the Town Hall) and north area (e.g. Chingford Assembly Hall).

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785	Ms Tessa Craig		Canal and River Trust manages the River Lee Navigation and associated towpath to the south west of the borough, within and bordering the South and Central Waltham Forest Areas it is important that The Plan recognises, references and promotes the Lee Navigation as well as the River Lea.	Noted, the Local Plan will be updated to include direct reference to Canal.
791	LVRPA	Lee Valley Regional Park Authority	Suggested changes to text: As the priority area for regeneration and good growth, proposals will be supported where they: L. provide facilities for and improve the visitor, sporting and wider cultural offer of the Lee Valley Regional Park and its venues, and thereby ensure their long-term viability, sustainability and contribution to the growing visitor economy. Proposals for the enhancement and further development of land and facilities associated with the national sporting and leisure venue at the Lee Valley Hockey & Tennis Centre will be supported where they complement the rest of the Queen Elizabeth Olympic Park, and the wider regeneration of South Waltham Forest.	Noted. However, proposed amendment is not accepted. It is considered that these venues be referenced in the area profile rather than the policy.
808	Ms Tessa Craig		We welcome policy 6 South Waltham Forest seeking to ensure place making principles are based on the character of the area, taking advantage of heritage, cultural and green assets including the River Lea. We request that the River Lee Navigation is also added to the references to green and blue spaces, a further waterway asset within and bordering the borough.	This point is noted. A reference to the River Lee Navigation will be made in the Local Plan.
971	The City of London	The Conservator's of Epping Forest	The Policy needs to reflect the very real constraint posed by the proximity of the Epping Forest SAC at Leyton Flats with a Zone of Influence that encompasses the entire development area. It is recognised that the developed character of much of the area presents little opportunity to provide suitable SANGS as mitigation for any potential development.	Noted, LBWF will work with you and other relevant bodies on required amendments.
1027	Mr Tim Brennan	Historic England	We note the overall objectives for the South and Central areas of the borough. We would welcome further clarity as to the 'place-making principles' to be adopted in these locations and	Noted, these will be set out in masterplan and the urban design SPD. The Council is preparing an additional Local Plan document on site specific allocations. This will provide opportunity to

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			how they will help achieve the intended growth in a manner that will complement the existing built environment.	apply the policies of the plan on specific sites, providing more details on how new developments could be integrated within existing local areas.
1029	Mr Tim Brennan	Historic England	Clause J should be revised to ensure that it reflects the NPPF's emphasis on sustaining and enhancing the significance of heritage assets in the course of planning and managing future development.	Noted, however, it is considered that this is covered in Chapter 16 of the Local Plan - Enhancing and Preserving our Heritage policies 77 to 83.
1122	Stagecoach		Stagecoach are supportive of LBWF's vision for South Waltham Forest, especially the recognition of Bakers Arms as a 'strategic location', and consider the objectives outlined under Policy 6 to be acceptable in principle.	Support noted.
1273	Josephine Vos	Transport for London- City Planning	Part I of the policy states that proposals will be supported where they encourage an improved cycling and pedestrian network. It is not clear how a development proposal would 'encourage' improvements in infrastructure. We would suggest using a term such as 'support', 'facilitate' or 'deliver'.	Noted, the Local Plan will be updated to make this clearer.
1500	Helen Monger	London Parks and Gardens Trust	LPGT welcomes the term "heritage, cultural and green assets" eg in Policies 6, 18, 19, 20, 21 and feel that this captures the spirit of good design. This term should be applied elsewhere in the plan to ensure all development meets this criteria.	Support noted.
1538	Mark Furnish	Sport England	Sport England supports that all the overriding policies for the various sub-areas of the borough requires proposals to contribute to the sporting assets of an area. Having regard to the extent of growth in each area, and associated increase in demand for sport facilities, it is important that the sporting infrastructure is enhanced where required otherwise there would be unmitigated increased strain on facilities. New/enhanced facilities advocated in the Draft Local Plan, such as the enhancements advocated in Policy 8 to Low Hall Sports Ground, should address the key findings and reflect the actions of the emerging Playing Pitch Strategy. Sport England advises that these policies refer to this strategy, and any other sporting	Support for overriding policies is noted. The Local Plan Regulation 19 will take into account the Play Pitch Strategy recommendations.

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			strategies, and express what is required to meet the emerging facility needs so that developers/applicants can be informed as to what sporting infrastructure is expected to support growth in the various areas.	
1583	Mr Matthew Robinson		Policy 6 ("South Waltham Forest") - which identifies South Waltham Forest as the priority area for regeneration in Waltham Forest capable of supporting the delivery of sustainable neighbourhoods in locations such as Lea Bridge.	Noted.
1597	Bob Bennet		In the light of current trends in the retail industry, is it realistic to have a Policy that seeks to have more retail investment in the centres in the south of the borough and elsewhere?	An assessment of the need for retail floorspace during the plan period (up to 2035) has been undertaken as part of the Waltham Forest Retail & Town Centres Study 2019. This assessment indicates that when current retail floorspace commitments are taken into account, there is no need to plan for an increase in retail floor space provision up to the medium term. However, to support the vitality and viability of town centres, the plan encourages local development opportunities for retail and other main town centre uses in individual centres where they are able to maintain and enhance the overall health of a centre.
1750	Wanis Ltd	Wanis Ltd	Wanis strongly supports the policy principle to support the co-location of non-employment uses, including residential use, on designated SIL sites and the identification of Lea Bridge as an area to deliver new sustainable neighbourhood providing a mix of new quality homes and employment floorspace. The Wanis site provides an opportunity site, in a highly accessible location, to achieve all these policy objectives.	Comment noted. The policy will be reviewed in light of the London Plan changes to ensure general conformity.
1758	Wanis Ltd	Wanis Ltd	The principle of transformational regeneration and good growth and the importance of the south of the borough as an important gateway location is strongly supported.	Support noted.
1761	Wanis Ltd	Wanis Ltd	It is considered that there should be a good policy emphasis on securing the highest density of development in such gateway	In line with the NPPF and the London Plan, the Local Plan supports high densities near transport hubs and in accessible locations.

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			locations that serviced by good public transport links, such as Lea Bridge.	
2000	Mr Paul O'Neil	Associate Director Metropolis PDG Ltd	The general principles included in policy 6 are supported.	Support noted.
2259		St William Homes LLP	Policy 6 sets out the Key priorities for the area. Policy 7 Lea Bridge and Church Road Strategic Location seeks to achieve a minimum growth target of 2,850 new homes. We would like to work with the Council further to understand this minimum capacity threshold, but it is broadly supported. We also support part (6) of Policy 7 to explore "development opportunities in areas of change such as the Gas Holder site".	Support noted and the Council are open to discuss the sites progression.
2333	The Arch Company		Chapter 5 of the Draft Local Plan sets out the Council's ambition and spatial approach for South Waltham Forest and its sub-areas, including South Leytonstone. Overall, The Arch Company supports the general direction for South Waltham Forest, as set out in Draft Policy 6, which seeks to create a framework for new development in the area contributing to the delivery of (A) a minimum of 15,000 new quality homes, (B) at least 3,250 new jobs and (C) a diverse and resilient economy. These objectives are similarly key to our client's ambitions who, through the development potential of their portfolio, can significantly contribute to achieving these over the plan period.	Support noted.
2350	Aviva Investors	Aviva UK Central Services	We welcome the identification of "South Waltham Forest" as a strategic area of change, growth and regeneration through redevelopment, and specifically, the identification of the Leyton Mills site for redevelopment.	Support noted.
2367	Sue Wildridge		This is a predominately residential area, and proposals to build tall housing (4-6 Stories) will impact badly on existing homes. The area around the Midland Road Arches is a disgrace. I would	Noted for consideration.

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			like to see the arches in Midland Road tidied up and made to comply with environmental standards. The joinery and metal fabrication businesses are not a problem, but car repair and repainting businesses are.	
2449	Aviva Investors	Aviva UK Central Services	We welcome the identification of "South Waltham Forest" as a strategic area of change, growth and regeneration through redevelopment, and specifically, the identification of the Leyton Mills site for redevelopment.	Support noted.
2474	London Hotel Group	London Hotel Group	The site lies within 'South Waltham Forest', within which the Local Plan identifies a target of 15,000 new homes and 3,250 new jobs. Part G of Policy P6 'South Waltham Forest' states that proposals will be supported where they contribute to cultural and sporting assets of the area to increase visitor economy, support the area's 'local centre and business, and build a vibrant evening economy'. Our redevelopment proposals for the site would assist in delivering these objectives. The proposals will also provide major leisure investment on the edge of the Bakers Arms District Centre, as required by Policy 6 (E) and 47.	It is noted that this point relates to a site-specific matter, best considered through a planning application.
2489	London Hotel Group	London Hotel Group	Part K of Policy P6 notes that 'new development and public realm improvements enhance the importance of gateway locations and the sense of arrival into the borough. These include but are not exclusive to Lea Bridge Road, Leyton, Thatched House and High Road Leytonstone, and all Transport Hubs'.	Noted for consideration.
2515	Alex Savine	London Legacy Development Corporation Ltd	An insertion into the text of the South Waltham Forest area section of the Plan along the following lines is suggested as a modification to the Plan when it is submitted for examination, along with an inclusion of an indication of the LLDC area extent within the Waltham Forest South map on page 31 of the draft Plan. "The London Legacy Development Corporation (LLDC) is currently the Local Planning Authority for the area indicated on	Noted, these suggested amendments will be made to the Local Plan ahead of Regulation 19.

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			the Waltham Forest South map (page 31) and on the Policies Map. Within this area, applications for planning permission are determined by the LLDC. Its adopted Local Plan contains the strategy and relevant planning policies for that area. In this context, it is also suggested that the Waltham Forest Local Plan Policies Map indicates the LLDC administrative boundary.	
2516	Alex Savine	London Legacy Development Corporation Ltd	For clarity around responsibilities for managing applications for waste sites within the area where the Legacy Corporation is Local Planning Authority, the Legacy Corporation would request that the following is added to the supporting text for Policy 99: 'The London Legacy Develop Corporation (LLDC) is currently the Local Planning Authority for part of the south west of the borough, which includes an area that is identified as an area for search for waste sites within the North London Waste Plan (LLDC3-WF - Bus Depot, Temple Mills Lane, Waltham Forest). Any potential waste site that is identified in this area would be subject to the policies and requirements as set out in the policies within the Legacy Corporation's Local Plan and applications for planning permission for such a site would be determined by it as Local Planning Authority.'	Noted, these changes will be made to the Local Plan.
2527	Ms Katie Glasgow	Planning Officer Hackney Council	The geographical area most relevant to Hackney is South Waltham Forest, and specifically the Lea Bridge and Church Street, Low Hall and Leyton Strategic Locations which adjoin Hackney. As you may be aware, we recently consulted on the proposed Main Modifications following the Local Plan 2033 hearing sessions. The Plan identifies Clapton / Lea Bridge as one of Hackney's main growth areas, for 'reinvention' through intensification, mixed use development and possible remodelling of the Lea Bridge Roundabout. This is based upon Hackney's Characterisation Study which assessed the borough's areas and centres. Clapton and Lea Bridge are directly connected via the Lea Bridge Road with the Lee Valley Regional	Noted, the Council is open to discussing this with LB Hackney to ensure that these areas remain distinctive.

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			Park between the urban areas. This provides an opportunity for cross-boundary cooperation to ensure that the policy approaches set out respective Local Plans are complementary. In particular, ensuring that smaller centres can provide locally distinctive shopping, leisure and cultural offers to complement and thrive in a network of town centres and high streets. We are in the early stages of developing a masterplan (supplementary planning document) for the Clapton/Leabridge area, and officers would welcome further discussion with Waltham Forest as it progresses.	
2888	Mr Ben Copsey		Walthamstow south as pre-eminent employment area - opportunity for developing this aspect of the borough rather than increasing already high population density. Residential areas of the borough better suited for increasing residential opportunities. Lack of non-employment infrastructure in South Walthamstow already a critical issue, increasing density of housing through large redevelopments will stress service provision beyond breaking point.	Noted. The delivery of the New Local Plan, Site Allocations Document and Infrastructure Delivery Plan sets out the borough's growth strategy for the next 15 years. It seeks to address the boroughs housing and employment land need and ensure that adequate local infrastructure is in line with projected growth.
2890	Mr Len Welson		I believe the proposal to build a further 15,000 new homes in the south of the borough is unsustainable, as there has already been too much development in this area and the infrastructure and facilities would be unable to cope with this level of development. No thought appears to have been taken by the Council on the effect on existing residents on this level of development. The area is already congested and has inadequate public facilities.	This comment is noted. It is recognised that intensification could be associated with concerns about new development becoming inappropriate to their context and destroying much of what people see as valuable in their daily living environments. However, if well managed, intensification could provide positive benefits to improve the quality of local environments. The plan contains a range of policies to guide the redevelopment of sites/areas whilst prioritising the protection of local character.
2896	Ms Mary Holden		About the vision/policy principles for the South, answering yes or no is really not appropriate. Whilst I agree with the idea of regeneration there are many areas that have not been addressed. The climate emergency has not been addressed by this draft and must be as a matter of urgency. Solar panels	There is a separate chapter of the plan dealing with Climate Change. See Chapter 18. The points made are noted for consideration.

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			should be installed on roofs of all new buildings. Whipps Cross Hospital and any new community buildings, shopping centres etc should be carbon neutral using solar panels and Pavegen floor tiles to produce power. Existing trees should be protected and plans should include additional planting. Wild flowers need to be planted and existed verges left to thrive i.e. left unmown throughout the spring and summer months.	
2899	Ms Carole Raeber		The best thing that could happen for South Waltham Forest is if the A12 could be covered and the top turned into cycling lanes and green spaces. That would also create a green belt from Lee Valley to Epping Forest.	This comment is noted for further discussion.
2913	Mrs Irena souroup		Finally, I am concerned about the height of the developments we have seen so far, both at lea bridge and Blackhorse Road. they are obscene and change the character of the area for the worse. I believe they are not creating 'liveable neighbourhoods' but highrise rabbit hutches not fit for humans. There needs to be a specific statement about the maximum height of buildings. The excuse that there are already high buildings is NOT a justification for more.	Comment noted for consideration. It is recognised that intensification could be associated with concerns about new developments being seen as inappropriate to their context and by extension, destroying much of what people see as valuable in their daily living environments. However, well managed intensification could provide positive benefits to improve the quality of local environments. The Local Plan contains a range of policies to guide the redevelopment of sites/areas whilst prioritising the protection of local character.
2924	Ms Mary Holden		There are no plans for social housing which is an urgent need to give lifelong security and genuine affordability for local residents. Also there doesn't seem to be any facilities for the youths. Youth crime and knife violence is a genuine concern and youth centres could provide safe places for young people to meet, study and enjoy themselves.	The plan contains a commitment to provide a broad range of housing choice by size and tenure including affordable housing. See policy 24 (Delivering genuinely affordable housing). The lack of facilities for the youths is also noted. Policy 55 seeks to ensure the provision of social infrastructure.
3024	Ms Tessa Craig		Also welcome is references to encourage improved cycling and pedestrian network across the south and finding new linkages and connections for walking and cycling to Lee Valley Regional Park, Queen Elisabeth Olympic Park, Epping Forest and Wanstead Flats, and other destination., We request that this policy also references the Lee Navigation and its tow paths as	It is proposed to make reference in the plan to the Lee Navigation, its tow paths as well as the River Lea, in particular noting its role in intra-borough connectivity and helping to provide access to green and blue spaces for residents and visitors.

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			well as the River Lea in helping to provide this intra-borough connectivity and helping to provide access to green and blue spaces and associated wellbeing benefits for LBWF's visitors and residents.	

Policy 7: Lea Bridge and Church Road Strategic Location				
ID	Full Name	Organisation	Comment	Council (Officers) Response
611	Victoria Sholund		I am concerned that the sites at Lea Bridge referred to as being possibly developed brown sites are the Thames Water Depot or the Waterworks Centre both of which are important parts of the Lea Valley Regional Park and very clearly important as Metropolitan Open Land, central as they are to surrounding MOL. I strongly object to either of these sites being put forward for development. The Thames Water Depot should categorically not be considered for development as it is a critical part of the wider area of Metropolitan Open Land and the Lea Valley Regional Park. Any development would seriously impact on its openness. The site should be incorporated into the Lea Valley Park as an integral part of the Essex and Middlesex filter beds as it is a valuable part of the green lung. There are many ways in which its designation as Metropolitan Open Land could be enhanced. It should not be considered a brownfield site as it would not be difficult to re-wild the area, while keeping the buildings as historical assets. (An area of hardstanding such as this does not constitute a 'brownfield' site -- it is simply an area of hardstanding within what is in fact a park as well as open land, albeit with no current public access). Although I am not a resident of Waltham Forest borough, as a resident of Hackney, I go to the marshes and filter beds every day, so any plans for the	No allocations are made as part of the Local Plan which is supported by a Green Belt and Metropolitan Open Land Study (2015-2019). The proposals to re-wild the area are noted. The council is committed to maintaining the sensitive balance between the need for development and the protection of Green Belt and MOL.

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Policy 7: Lea Bridge and Church Road Strategic Location				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			area will have an impact on me and other Hackney residents who use the green spaces.	
786	LVRPA	Lee Valley Regional Park Authority	Both the Lee Valley Ice Centre and Riding Centre lie just outside the Lea Bridge and Church Rd Strategic Location whilst the WaterWorks Centre sits within it. With the reopening of Lea Bridge Station this is an accessible location.	Noted, these are still considered to be important assets and visitor attractions in the area, wider borough and regionally.
809	Ms Tessa Craig		We would welcome discussion with LBWF into how the Lee Navigation can play a part of the gateway and celebrating the unique character of the Navigation Lea Bridge described in priority 12	Noted, a Duty to Cooperate meeting will be arranged to discuss this.
810	Ms Tessa Craig		We welcome priority 15 which refers to improving public real and public spaces across the area and walking and accessibility, connectivity permeability and legibility to Lee Valley Recreational Park.... River Lee and other green and blue spaces. We welcome this and again would like to see reference to the River Lee Navigation and the River Lea.	Noted, the Local Plan will be updated to include reference to the River Lea.
911	Mr Mathew Frith		Parts 15 and 16: We support these.	The Council notes the statement of support provided.
1274	Josephine Vos	Transport for London- City Planning	We welcome the reference in part 15 to walking and cycling connectivity improvements. We would welcome a similar clause referring to improved public transport, including bus services.	Noted for consideration. Any bus improvement will need to be in partnership with TfL and be set out in the IDP.
1519	Dan Straw		The Lea Bridge Waterworks (currently Thames Water Depot) should categorically not be considered for development as it is a critical part of the wider area of Metropolitan Open Land and the Lee Valley Regional Park and any development outside of the existing footprint would seriously impact on its permanence and openness.	No allocations are made as part of the Local Plan which is supported by a Green Belt and Metropolitan Open Land Study (2015-2019). The proposals to re-wild the area are noted. The council is committed to maintaining the sensitive balance between the need for development and the protection of Green Belt and MOL.
1520	Dan Straw		This site [The Lea Bridge Waterworks] should be protected from development and opened up to public access, re-imagined as a place for wild swimming and community horticulture, with the	No allocations are made as part of the Local Plan which is supported by a Green Belt and Metropolitan Open Land Study (2015-2019). The proposals to re-wild the area are noted. The

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			vital habitat along the river designated as a nature reserve and connected to the neighbouring Middlesex Filter Beds Nature Reserve and other parts of the site left to 're-wild'. The existing concrete slab could easily be removed in some areas and to reveal the buried filter beds below. A swimming / pond area could be created from a section of the old filter bed, reimagined as a place for wild swimming. The site should be re-wilded, allowing nature to reclaim the built environment naturally in some places and replanting and landscaping in others. The site should be a space for people to learn how to live harmoniously with nature, perhaps through small-scale good growing or sustainable foraging or a social enterprise or community garden centre like Growing Concerns in Tower Hamlets or Living Under One Sun sites in Haringey. It should be a place to showcase the area's industrial heritage by retaining and enhancing the site's historic buildings It is a valuable part of the green lung, linking the Middlesex Filter Beds and the Essex Filter Beds and should be reconnected to the surrounding sites. Retaining an area of public hard landscaping would complement the surrounding area.	council is committed to maintaining the sensitive balance between the need for development and the protection of Green Belt and MOL.
1576	Mr Matthew Robinson		In summary, Peabody support the identification of Lea Bridge as a strategic location for mixed-use intensification and transformation over the plan period.	Support noted.
1577	Mr Matthew Robinson		The ability to co-locate employment and non-employment uses in this location through a comprehensive and masterplanned approach is strongly encouraged, with the land at Rigg Approach and Lammas Road (which is being promoted for intensification by Peabody) deemed suitable for this.	Co-location is not supported in SIL locations in the London Plan and the Local Plan will be updated to reflect this and to ensure general conformity.
1585	Mr Matthew Robinson		Policy 7 ("Lea Bridge and Church Road Strategic Location") - which seeks to deliver a minimum of 2,850 new homes in the Lea Bridge and Church Road Strategic Location, as well as retain existing employment land through "intensification, co-location	Support noted.

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			and renewal” as per the draft London Plan (other than the Argall Industrial Estate which is to be “safeguarded” for industrial uses only). Peabody support the provision of modern light industrial spaces, as well as other leisure uses (such as retail, food and drink) with the creation of higher densities around Lea Bridge Station.	
1680	David Thompson	The Manager RVL Holdings PLC	Delete clause 7 - Re-provides the waste services at Estate Way in line with the requirements of the North London Waste Plan.	The clause will be reviewed to reflect the North London Waste Plan.
1681	David Thompson	The Manager RVL Holdings PLC	The overall policy is supported	Support noted.
1682	David Thompson	The Manager RVL Holdings PLC	Criteria 5, seeking the diversification and intensification of employment to allow for redevelopment and co-location with new homes. This reflects current proposals for the site.	Noted.
1683	David Thompson	The Manager RVL Holdings PLC	Criteria 7 is not reflective of the North London Waste Plan and should be deleted. The waste facilities are being relocated to a purpose-built waste site at Gibbs Road and the existing facility is being decommissioned. Estate Way is heavily constrained site for such activities and is in close proximity to homes and a school. Substantial mitigation is required regarding noise, dust and pollution which meant that the location was not sustainable. The NLWP consultation statement (August 2019) confirms the relocation allows the deletion of the allocation. “The discharge of conditions for the planning permission for the Enfield site has been progressing since the Reg 19 version of the NLWP was agreed. The Environmental Permit process has been going on in the same time period. The Boroughs are now satisfied that the Enfield site provides compensatory provision for the Leyton site and that WAF 4 can be deleted and be replaced with the new site at Gibbs Road, Enfield. For the avoidance of all possible doubt, there is no loss in waste	The Local Plan will be updated to reflect the North London Waste Plan.

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			capacity resulting from the de-designation of the site and reallocation to Gibbs Road. Indeed, the total tonnage that can be processed increases from 75,000 tonnes to 200,000 tonnes, and appropriate permits have been secured with the Environment Agency.	
1684	David Thompson	The Manager RVL Holdings PLC	A welcome addition to the policy would be a reference to development capacity.	Noted for consideration.
1685	David Thompson	The Manager RVL Holdings PLC	The GBN site could potentially yield over 450 homes and 15,000sqm of employment floorspace.	Noted.
1686	David Thompson	The Manager RVL Holdings PLC	In addition to the RVL proposal neighbouring sites can also come forward, and a masterplan has been prepared in consultation with key stakeholders.	Noted, LBWF is open to discussing a masterplan for the area.
1687	David Thompson	The Manager RVL Holdings PLC	Referencing these minimum targets would provide greater clarity and certainty over how the strategic target would be met. It is therefore proposed that criteria 7 is simply replaced with "7. The former GBN site at Estate Way to contribute 15,000m2 of employment floorspace and 450 new homes."	Noted for consideration.
1688	David Thompson	The Manager RVL Holdings PLC	The removal of the waste reference will ensure conformity with the North London Waste Plan and help realise the opportunity for a high-quality mixed-use redevelopment of the site.	The Local Plan will be updated to reflect and be in conformity with the North London Waste Plan.
1716	Wanis Ltd	Wanis Ltd	Overall, Wanis strongly supports the jobs and housing growth ambitions at the heart of the draft Local Plan, with the Lea Bridge area identified as a strategic location within which accelerated, high quality growth can be delivered.	Support noted.
1724	Wanis Ltd	Wanis Ltd	Wanis strongly support the regeneration aspirations for the Lea Bridge area. there is a real opportunity to build on the area's inherent strengths and recent infrastructure investment and create a new sustainable neighborhood that provides local houses and local jobs for local people	Support noted.

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1727	Wanis Ltd	Wanis Ltd	Wanis also supports the principle for securing co-location of employment and non-employment uses on SIL sites in and around the Lea Bridge gateway, building on the recent investment in Lea Bridge railway station.	Comment noted. The policy will be reviewed in light of the London Plan changes to ensure general conformity.
1762	Wanis Ltd	Wanis Ltd	Parts 2, 3 and 12 Wanis strongly supports the identification of sites around Lea Bridge station as being suitable for intensification and co-location, for both employment uses and higher density housing.	Support noted.
1763	Wanis Ltd	Wanis Ltd	The recognition of the junction of Lea Bridge Road and Orient Way as an important gateway into the borough is also fully supported.	Support noted.
1786		GBN SERVICES LTD	Having reviewed the Draft Local Plan we considered that it does not align with the position of the emerging NLWP, in requiring re-provision of waste services at the borough's Estate Way site.	The Local Plan will be updated to ensure it is in line with North London Waste Plan.
1787		GBN SERVICES LTD	We submit that the Draft Local Plan is not sound without an amendment to bring it into alignment with the emerging NLWP.	The Local Plan will be updated to ensure it is in line with North London Waste Plan.
1788		GBN SERVICES LTD	Clause 7 should be omitted to reflect the emerging North London Waste Plan, which it is agreed that the Estate Way site can be deleted and replaced with compensatory provision outside of the borough, but within the North London Waste Plan Area.	The Local Plan will be updated to ensure it is in line with North London Waste Plan.
1789		GBN SERVICES LTD	GBN have already commenced relocating their operations from Estate Way (LB Waltham Forest) to their new site at Gibbs Road (LB Enfield). This was on the basis that the Estate Way site would be redeveloped for mixed-use development, including employment generating land uses that are considered more appropriate given the surrounding residential land use.	The Local Plan will be updated to ensure it is in line with North London Waste Plan.
1790		GBN SERVICES LTD	The Estate Way site is located in a heavily congested area of the borough with Church Road restricted to a 20mph speed limit, and the redevelopment of local roads limiting operations of the site's HGVs which get caught in congestion on a daily basis. The	The Local Plan will be updated to ensure it is in line with North London Waste Plan.

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			Estate Way site and the limitations of the local road network also present issues in term of highways safety for road users and pedestrians, given HGVs have to manoeuvre around a number of tight corners and junctions on the local roads which serve the increasing number of residential properties in the area.	
1791		GBN SERVICES LTD	The site at Estate Way does not allow for efficient operation to take place given existing site conditions, and has only ever benefited from an EA License allowing 75,000 tons of material to be processed.	The Local Plan will be updated to ensure it is in line with North London Waste Plan.
1819	Robert Tatam		I appreciate that the details of Masterplans have yet to be published, but additional detail in this first and overall Local Plan stage is required for policies that, in its absence, sound bland, unachievable or improbable. Two examples of this risk - crime and flooding. Policy 7, number 14 "Uses designing out crime principles"; these were promised in residential and non-residential developments over the last two decades, but have unfortunately had insufficient effect on actual crime levels and the Anti-Social Behaviour (as can be seen by the need from 1 st November to set up a Public Space Protection Order for Chingford and Highams Park).	Noted for consideration.
1845	Peter Mudge		The site of the Waterworks Centre must not be made available for development. It is argued that this is also a brownfield site, because there is a carpark at the site, but that is a misrepresentation of the facts. Of the area surrounding the Centre, about 18% is tarmacked, about 4% is built-on, and the remaining 78% is grass. Currently this area is not as well-used as it might be, because of its comparative inaccessibility by foot and bicycle. Consideration should be given to a new bridge over the River Lea in the vicinity of the outflow of the flood relief channel, and to a tunnel under the Lea Bridge Road in the	The Local Plan does not designate any land for redevelopment in the Metropolitan Open Land.

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			vicinity of Lea Bridge Station. And more green space could be gained by removing (or reducing) the carpark.	
1852	Dr Richard Hobbs		This site should be protected from development and opened up to public access, re-imagined as a place for wild swimming and community horticulture, with the vital habitat along the river designated as a nature reserve and connected to the neighbouring Middlesex Filter Beds Nature Reserve and other parts of the site left to 're-wild'. The existing concrete slab could easily be removed in some areas and to reveal the buried filter beds below. A swimming / pond area should be created from a section of the old filter bed, reimagined as a place for wild swimming. The site should be re-wilded, allowing nature to reclaim the built environment naturally in some places and replanting and landscaping in others. The site should be a space for people to learn how to live harmoniously with nature, perhaps through small-scale good growing or sustainable foraging or a social enterprise or community garden centre like Growing Concerns in Tower Hamlets or Living Under One Sun sites in Haringey. It should be a place to showcase the area's industrial heritage by retaining and site's historic buildings It is a valuable part of the green lung, linking the Middlesex Filter Beds and the Essex Filter Beds and should be reconnected to the surrounding sites. Retaining an area of public hard landscaping would complement the surrounding area. Yours faithfully,	No allocations are made as part of the Local Plan, which is supported by a Green Belt and Metropolitan Open Land Study (2015-2019). The proposals to re-wild the area are noted. The council is committed to maintaining the sensitive balance between the need for development and the protection of Green Belt and MOL.
1856	Tom Hartney		I would like to state my support for the Save Lea Marsh campaign for the Lea Bridge Waterworks site to be protected from development and opened up for wild swimming and community gardening. As the opening of the Walthamstow Wetlands has shown, there is high public demand for accessible areas of nature in east London, and while there is a need for	Noted, the Local Plan has noted allocated any sites in Metropolitan Open Land.

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			new housing, riverside sites like this are valuable and should be preserved for both London wildlife and future generations. In addition new housing requires a balance of new leisure and heritage facilities for a high quality of life and public health to be maintained	
1866	miss susan murray		As a long-time resident of Lea Bridge I am very troubled by your plans to destroy our green buffer ie Pocket Park & the land around Lea Bridge train station especially in light of the fact that LBWF has called an Emergency Climate status. Can you please explain to me how you justify such a move?	The Pocket Park on Lea Bridge Station was created following the construction of Orient Way as a relief road, as part of the landscaping scheme. The land is currently designated as Highway land and was previously industrial land. The draft Plan contains policies to manage the loss/replacement of open spaces. See policies 84 and 85.
1996	Mr Paul O'Neil	Associate Director Metropolis PDG Ltd	We welcome the general designation of the Lea Bridge Area as a location to focus regeneration	Support noted.
2001	Mr Paul O'Neil	Associate Director Metropolis PDG Ltd	The site owners support the general intent of this policy and the contribution that the former stadium site can make to meeting these objectives should be recognised in the plan.	Support noted
2052	Natalie Stopford		The Lea Bridge Waterworks (currently Thames Water Depot) should categorically not be considered for development as it is a critical part of the wider area of Metropolitan Open Land and the Lea Valley Regional Park and any development outside of the existing footprint would seriously impact on its permanence and openness. This site should be protected from development and opened up to public access, re-imagined as a place for wild swimming and community horticulture, with the vital habitat along the river designated as a nature reserve and connected to the neighbouring Middlesex Filter Beds Nature Reserve and other parts of the site left to 're-wild'. The existing concrete slab could easily be removed in some areas and to reveal the buried filter beds below. A swimming / pond area should be	No allocations are made as part of the Local Plan which is supported by a Green Belt and Metropolitan Open Land Study (2015-2019). The proposals to re-wild the area are noted. The council is committed to maintaining the sensitive balance between the need for development and the protection of Green Belt and MOL.

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			created from a section of the old filter bed, reimagined as a place for wild swimming. The site should be re-wilded, allowing nature to reclaim the built environment naturally in some places and replanting and landscaping in others. The site should be a space for people to learn how to live harmoniously with nature, perhaps through small-scale good growing or sustainable foraging or a social enterprise or community garden centre like Growing Concerns in Tower Hamlets or Living Under One Sun sites in Haringey. It should be a place to showcase the area's industrial heritage by retaining and enhancing the site's historic buildings. It is a valuable part of the green lung, linking the Middlesex Filter Beds and the Essex Filter Beds and should be reconnected to the surrounding sites. Retaining an area of public hard landscaping would complement the surrounding area.	
2101	Marion Osborne		I am strongly opposed to the destruction of the much needed green space which is Orient Way Pocket Park, and felling of its trees. Simply put, this would be counterproductive to the Council's own well documented environmental and Climate Change goals stated in the said consultation policy documents, and detrimental to the area due to these same reasons.	The Pocket Park on Lea Bridge Station was created following the construction of Orient Way as a relief road, as part of the landscaping scheme. The land is currently designated as Highway land and was previously industrial land. The draft Plan contains policies to manage the loss/replacement of open spaces. See policies 84 and 85.
2251		St William Homes LLP	Gasworks is a suitable and available brownfield site which can help meet the Council's objectives. St William at Lea Bridge can help address these issues by delivering the following: More housing to meet Waltham Forest's aim of 27,000 additional homes over the plan period (2020-2035) Lea Bridge Gasworks is free of land ownership issues and has immediate residential development capacity. This site can help Waltham Forest meet its housing growth ambitions, and indeed, is fundamental to it. It will play a role in being a catalyst for housing growth within the immediate area, and borough.	Noted.

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Policy 7: Lea Bridge and Church Road Strategic Location				
ID	Full Name	Organisation	Comment	Council (Officers) Response
2351	Aviva Investors	Aviva UK Central Services	Aviva considers and supports the Leyton Mills site as falling within a "transformation" area where high dwellings per hectare are to be secured	Noted for consideration.
2352	Aviva Investors	Aviva UK Central Services	Aviva also considers the Leyton Mills area to be suitable to accommodate tall buildings.	Noted for consideration.
2452	Aviva Investors	Aviva UK Central Services	The Leyton Mills site, as a successful retail park, has a high existing use value and generates good annual financial returns. Present residential values in Leyton and the borough, whilst increasing, still limit the ability to create sufficient profit to enable all the benefits expected to flow from redevelopment and may therefore be unrealistic. Aviva would like to see the emerging Local Plan policies acknowledge these points, create some flexibility in policy, and temper aspirations of what can be afforded through redevelopment, to make redevelopment during the Plan period an attractive proposition for Aviva.	Noted for consideration.
2453	Aviva Investors	Aviva UK Central Services	Aviva is optimistic and excited about the development potential of Leyton Mills into the future. An opportunity exists to better link the underground station, High Street, and Olympic Park via redevelopment of Leyton Mills, provide enhanced public realm, place making and homes, jobs and supporting uses.	Noted for consideration.
2454	Aviva Investors	Aviva UK Central Services	Aviva confirms that at some point during the Local Plan period the site may become available for redevelopment. If it does then it has significant potential to accommodate a mix of uses, including residential in a number of statement blocks.	Noted for consideration.
2455	Aviva Investors	Aviva UK Central Services	Aviva welcomes the opportunity to assist the LPA in creating appropriate and deliverable SPD policy for Leyton Mill's future redevelopment and input into the future Urban Design SPD. Aviva confirms its willingness and preference to be actively involved.	Noted for consideration.

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2889	Mr Ben Copsey		Density and number of developments is far too high. Equitable spread across brownfield sites in the whole of the borough would produce a fairer effect, more widely distributed economic benefits and ease infrastructure issues. All other housing developments in South Walthamstow could fit inside the proposed number of Lea Bridge housing developments - this is absolutely ridiculous and unbalanced. Significant numbers of empty frontages along Lea Bridge Road suggest no demand for additional shopping frontage - community and medical use should be prioritised.	This comment is noted for further consideration.
2891	Mr Len Welson		I am against the proposal to build a further 2,850 homes in the Lea Bridge area, as the area is already unable to cope with the level of development being thrust upon us.	This comment is noted.

Policy 8: Low Hall Strategic Location				
1598	Bob Bennet		Whilst the re-opening of Lea Bridge Station has been very beneficial for residents and businesses in the Leyton area in giving much improved access to Stratford and its public transport services, it is noted that the reopening of the Low Hall curve is no longer in the plan. Without that additional infrastructure a large part of the borough has a very difficult access to Stratford and its public transport services.	Noted for consideration.

Policy 9: Leyton Strategic Location				
ID	Full Name	Organisation	Comment	Council (Officers) Response
789	LVRPA	Lee Valley Regional Park Authority	The Lee Valley Hockey & Tennis Centre is a national sporting and leisure venue hosting local, national and international events. It supports the Olympic sporting legacy currently being	Noted, the venue will be included in the Local Plan.

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Policy 9: Leyton Strategic Location				
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			delivered by the London Legacy Development Corporation and is a major facility serving the whole borough and contributing in particular to the Leyton growth area its vibrancy and cultural interest.	
912	Mr Mathew Frith		Parts 12 and 14: We support these.	Support noted.
913	Mr Mathew Frith		Parts 7 and 8: We support these.	Support noted.
1275	Josephine Vos	Transport for London- City Planning	Policy 9 should refer to plans for step-free access and capacity improvements at Leyton station.	Noted, step free access will be added to this policy. Capacity improvements are not within the Council powers and will need discussion with DfT, National Rail and Greater Anglia Rail.
1277	Josephine Vos	Transport for London - City Planning	Part 6 of the policy refers to improved public realm for pedestrians and cyclists. We recommend using the term 'people walking and cycling' wherever appropriate. This term more accurately conveys that people use a variety of modes at different points in time, and avoids connotations of different people belonging to separate groups depending on their travel choices (e.g. being a 'cyclist' or a 'motorist')	Noted, the Local Plan will be updated to include this wording.
1278	Josephine Vos	Transport for London - City Planning	We would welcome a reference to the importance of retaining a bus garage in the area. The current facilities at the Lea Interchange bus garage- identified on south area map as part of a Strategic Industrial Location (SIL) - is one of the largest in London and is necessary to support public transport services in the borough and the wider area	Noted for consideration.
1279	Josephine Vos	Transport for London - City Planning	The potential for intensified development at New Spitalfields that the policy refers to (or any other development) could potentially provide an opportunity to reprovide facilities if the Lea Interchange is redeveloped or repurposed at any point in future, such as to provide additional rail sidings capacity.	Noted. The Local Plan can only consider land that has a realistic prospect of coming forward in a 15 year period.

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Policy 9: Leyton Strategic Location				
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1599	Bob Bennet		Priority13. What does "contribute to a sense of arrival" actually mean in practice	Noted, the wording will be updated to make it clearer.
2083	Councillor Sally Littlejohn		Under the heading "Sustainable Transport", paras. 15.3 and 15.4, there is mention of a goal of achieving an 80% mode share for active and sustainable travel by 2041. In the section on South Waltham Forest, development priorities (Policy 9, page 37) include (item 3): "Utilisation of existing employment land (including railway arches) for mixed-use intensification and co-location, including the provision of new workspace, light industrial (where appropriate), food and drink and offices". Both of these desires I support whole-heartedly, but I think there is a connection missing. In Cann Hall ward, I think you ought to look more closely at the transport provision west of the High Rd. If the railway arches are to be developed as anything other than vehicle repair businesses, and we want to discourage car travel to arch destinations revitalised as business and retail premises, towards the west side of Cann Hall, then more consideration will need to be given to public transport. The area is already becoming revitalised by the fact of an increasing number of pub/cultural/social businesses on Winchelsea Rd, 2 pubs coming back into use, after 4 years or more of closure, another one having a major makeover. Many people are recognising the value of coming to settle in this area, and are investing in the housing there.	Noted.
2084	Councillor Sally Littlejohn		For a long time, possibly decades, locals have dreamed of opening an Overground station in Cann Hall - e.g. at the west end of Cann Hall Rd, or further down the line, in the Winchelsea Rd/Pevensey Rd/Vansittart Rd area. There is one bus route across the ward - the 58. I suggest some discussion with London Overground is done to explore possibilities for a new Overground station, and some exploration is done to find	Noted for consideration. There are currently no plans for a new station in the Cann Hall Road in the Mayor's Transport Strategy.

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			whether more buses could be introduced - e.g. single-deckers that could go along Harrow Rd.	
2293	Sue Wildridge		This is a predominately residential area, and proposals to build tall housing (4-6 Stories) will impact badly on existing homes. The area around the Midland Road Arches is a disgrace.	The Local Plan is based on a character led approach to new development, which is set out in the Characterisation and Intensification Study and in Policy 5 Encouraging Mixed Use Development and Intensification. Any new tall building would also have to adhere to the criteria set out in Policy 62 Delivering High Quality Design and Policy 63 Taller Buildings.
2460	The City of London	Department of the Built Environment City of London	Timing: With uncertainty surrounding both the NSM move to Barking Reach and the potential delivery of a new Network Rail station at Ruckholt Road, an appropriate mix of uses that acknowledges these possibilities should be considered; and Balance: Appropriate policy wording that balances both LWBF's growth strategy and CoLC's aspirations for the NSM site	Noted. The policy will updated to recognise this.
2461	The City of London	Department of the Built Environment City of London	As set out on page one, the Market Consolidation Programme's indicative timeline is conditional on several factors, including Parliamentary approval. Should the proposed Bill achieve Royal Asset by March 2023, and following tenant decant, it is estimated that the earliest NSM would move to Barking Reach is 2025. Following this, and a reasonable programme for site redevelopment (including planning and construction), LBWF's locational and growth aspirations are unlikely to be realised through the NSM site until the latter half of the plan period (between c.2030-2035).	The timescales for the delivery of New Spitalfields Market are noted.
2462	The City of London	Department of the Built Environment City of London	The prospect of a new mainline rail station at Ruckholt Rd, located at the south-east corner of the NSM site, has the possibility to significantly enhance the NSM site's development potential, moving the current PTAL rating from 0 (Worst) in parts, to 6 (Best, assumed on the basis of connecting passengers to Stratford and Tottenham Hale at an appropriate frequency) and unlocking the opportunity to deliver a mix of	Noted. The Council is still reviewing the feasibility of a new station at Ruckholt Road.

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			uses, not just employment. That said, the possibility of a new station is not guaranteed with Section 5 - South Waltham Forest of the LBWF Draft Local Plan acknowledging this, stating "there are aspirations for a further National Rail station at Ruckholt Road". To date, Network Rail has not indicated publicly their intention to deliver a new station at Ruckholt Road.	
2463	The City of London	Department of the Built Environment City of London	The potential of a "sustainable mixed neighbourhood" development coming forward at NSM (as per LWBF's Draft Local Plan Policy 9 - Leyton Strategic Location) is conditional on two key factors: i. That the New Spitalfields Fruit and Vegetable Wholesale Market moves as part of the CoLC's Market Consolidation Programme to Barking Reach; and	Noted for consideration.
2464	The City of London	Department of the Built Environment City of London	That the level of provision of public transport infrastructure is consistent with the nature of development to sustain future resident and employment needs.	Noted for consideration.
2465	The City of London	Department of the Built Environment City of London	In the event that there are delays delivering the new Ruckholt Road station but the NSM moves, due consideration is required as to how a sustainable mixed-use development on the NSM site can come forward that not only satisfies the LBWF's growth agenda, but also aligns with policies in the Mayor of London's Draft London Plan (namely policy's GG2, GG5, E4) and safeguards the CoLC's interests. Accordingly, the NSM policy provision should expand on the number of appropriate uses to ensure that a future, viable development proposal could come forward even without supporting public transport infrastructure.	Noted for consideration. This will be taken forward via masterplan SPD for the area. The Council considers the City of London a key stakeholder in this process and wants to work with collaboratively on this project.
2466	The City of London	Department of the Built Environment City of London	Given this requirement is very clearly established at the regional level, it is proposed that the phrase "involving the re-provision of existing" is removed from the NSM specific policy. Doing so does not minimise the need to satisfy this broader objective, and would effectively expand on the opportunities	This comment is noted for further consideration.

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			for the NSM site, ensuring a sustainable mixed-use neighborhood that balances a market driven quantum of housing and employment uses can be brought forward on the site.	
2469	The City of London	Department of the Built Environment City of London	To re-iterate the above, the removal of the wording “involving the re-provision of existing” does not impact on the CoLC’s potential to retain some form of employment floorspace, but rather it ensures flexibility in delivering an appropriate quantum of employment and housing in the LBWF.	Noted, for consideration. However, the London Plan has designated Waltham Forest as a borough which must retain its industrial land. The approach to how BEA and LSIL is managed is being carefully considered.
2470	The City of London	Department of the Built Environment City of London	As LBWF has not yet undertaken a detailed masterplanning process for the NSM site, it is also recommended that the above suggested amendments are considered to ensure flexibility - allowing a mixed-use scheme to come forward that is viable, deliverable and satisfies LBWF’s growth agenda, the CoLC’s aspirations for market consolidation, and the Mayor’s wider ambitions for Good Growth in London.	Noted for consideration.
2471	The City of London	Department of the Built Environment City of London	“Delivers intensified development at New Spitalfields area of change in the event the market comes up for redevelopment during the plan period to create a thriving, mixed-use sustainable neighbourhood, including new quality homes, involving the re-provision of the existing employment floor space, including and modern light industrial/manufacturing and workspace, storage and distribution , cultural uses and supporting social and community infrastructure.”	Noted for consideration.

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Policy 10: Leytonstone Strategic Location				
ID	Full Name	Organisation	Comment	Council (Officers) Response
914	Mr Mathew Frith		Parts 9 and 10: We support these	Support noted.
970	The City of London	The Conservator's of Epping Forest	At 5.4 and Policy 10 (page 39) the Area profile refers to Epping Forest and Wanstead Flats. Wanstead Flats are part of Epping Forest and the profile may read better by commenting 'The east is defined by the grassland Open Spaces of Epping Forest at Leyton and Wanstead Flats, which share a boundary with the London Borough of Redbridge'. Similarly, the Vision for South Waltham Forest does not reference Epping Forest in relation to Open Spaces, particularly given that Leyton Flats is the most highly visited part of Epping Forest with over 440,000 annual visits.	Noted, the area profile will be updated to reflect this.
972	The City of London	The Conservator's of Epping Forest	Recommends improvements to the public realm and public spaces across the area and references the City Corporation's landholding at Epping Forest, including Wanstead Flats. Mindful that previous CRISP exercises led by Sustrans saw little public enthusiasm for public space improvements at Wanstead Flats in 2008 where they include unimaginative new macadam path provision, lighting and signage. The City Corporation supports moves that encourage a modal shift towards walking, cycling and the growing Personal Electric Transport (PET) sector.	Noted, will update the Local Plan to include reference.
1036	Mr Tim Brennan	Historic England	South Leytonstone comment We note the reference here at bullet point 2 to potential 'taller' buildings around Leytonstone High Road station. Given the prevailing existing building heights in the area, we would wish to ensure that adequate consideration is given to the potential impacts of taller buildings on views into and out of the Grade II* Wanstead Park (currently on the Heritage at Risk register).	Noted for consideration.
1041	Mr Tim Brennan	Historic England	We recommend that clause 8 should be amended to read 'Preserve or where opportunities arise enhance the character and appearance of the Browning Road Conservation Area'. This	Noted, the policy will be amended to include these changes.

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Policy 10: Leytonstone Strategic Location				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			would reflect the wording of the Planning (Listed Building & Conservation Areas) Act 1990 and para 200 of the NPPF in relation to conservation areas.	
1600	Bob Bennet		Priority13. What does “contribute to a sense of arrival” actually mean in practice.	Noted, the wording will be updated to make it clearer.
1961	Sandra Sweeney		I support the following suggestions made at the meeting to include the outer edges of the borough, notably the Thatched House area to preserve the individualism of Leytonstone, to avoid the overpopulation of chain shops/coffee shops and the like more trees and systems for maintaining them.	Support noted.
1973	Dr Robert Gay		I would question whether it can be appropriate to build tower blocks (by which I mean above about 6 storeys) in Leytonstone Town Centre. They would obviously be out of keeping in the High Road. In the small area of the Town Centre (as shown on the map displayed at the Epicentre, coloured in dark blue) which is away from the High Road, it would not be appropriate to build tower blocks by Leytonstone Tube station, directly by St John's Church and churchyard. In my view, it would not be suitable to encourage large residential development right by a Tube line which is above ground and now runs at night two nights a week, and right above an above ground Tube station which runs all night two nights a week, and also is in regular use as a point of entry for work teams other nights.	The Local Plan is based on a character led approach to new development, which is set out in the Characterisation and Intensification Study and in Policy 5 Encouraging Mixed Use Development and Intensification. Any new tall building would also have to adhere to the criteria set out in Policy 62 Delivering High Quality Design and Policy 63 Taller Buildings.
1975	Dr Robert Gay		Those who live in the development on Kirkdale Road, between the Matalan car park and Kirkdale Road, have no green space near them other than the churchyard, which is consecrated ground and is fenced off on their side. It is not desirable that there should be other developments with no private green space (individual or communal) and no easy access to public green space.	The Local Plan Policy 27 Housing Design includes requirements for open space.

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1977	Dr Robert Gay		In my view so-called 'car free' developments are not appropriate in our area. (At the Public Enquiry into the UDP, I was instructed by the Bushwood Area Residents Association to oppose this policy and the Inspector was persuaded to reject it.) People take apartments in such developments in the expectation that they will not need a vehicle, and then they fall in love with someone whose work requires a car (such as an estate agent or a district nurse) or they may become disabled and need a car. There will inevitably be compassionate cases and they will eventually be allowed residents permits and so increase pressure on street parking.	Car free development has been permitted across the South and Central borough and supports the aims of the Mayor's Transport Strategy and the London Plan.
1978	Dr Robert Gay		Subject to the above I would welcome residential development up to about 6 storeys (perhaps four storeys plus one or two in a mansard) on sites not directly by the Tube line such as Robartes House (the former Jobcentre).	Noted.
1979	Dr Robert Gay		Specifically, respecting the character of Leyton and Leytonstone requires there not to be horizontal slabs, like the lower rise part of the recent development on Ruckholt Road in Leyton (opposite the turning going down to Asda). Any wide building (that is, wider than a single Victorian terrace unit would be) needs to be divided into vertical units which are clearly articulated (not just divided by a vertical drainpipe between every pair of windows). Silks Court on the Leytonstone High Road at the corner of Barclay Road seems an example of what should be done.	Noted.
1983	Dr Robert Gay		As was said at the meeting, there is a need to encourage office uses in Leytonstone. We have lost the NE London Probation Service and NUMAST, and we are left only with offices providing services to the immediate area, such as the Waltham Forest CCG and estate agents. Offices provide lunchtime custom for shops and pubs/restaurants (and so may reduce the pressure on pubs to open very late hours).	Noted.

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Policy 10: Leytonstone Strategic Location				
ID	Full Name	Organisation	Comment	Council (Officers) Response
1985	Dr Robert Gay		At the meeting, I pointed out that Leytonstone was developed as an area for people working in the centre of London to commute in by train to Liverpool Street. Comments were made about commuting being environmentally undesirable, but I would suggest that if people commuting into Liverpool Street live in Leytonstone and come in by the Tube, that is better than if they move out into Essex where they get driven to the station and then come in by long distance train from Audley End or Harlow. We need to make Leytonstone an attractive area for people who could choose to live much further out. In my view (and subject to the desirability of promoting office uses in Leytonstone Town Centre and other centres in the borough) the Council should not be particularly concerned to promote employment within the borough.	Noted.
2284	Abbas Mirza		Key challenges which face this area include affordable housing, HMO's, better access in terms of transport and parking.	These matters are noted. The plan contains policies to address the need for affordable housing (see Policy 25). Policy 32 also deals with Houses in Multiple Occupation (HMO) and Conversions. Also, there are policies on transport and parking which seek to address these challenges (See Policies 69 and 72).
2332	The Arch Company		In regard to the potential implications of the emerging Draft Local Plan it is of importance to identify that The Arch Company has substantial land holdings within the borough, specifically in South Leytonstone, with a portfolio of sites available for delivery over the plan period. The key site within this portfolio is the Land at Joseph Jay Road, adjacent to Leytonstone High Road Overground station, which predominantly accommodates warehouse and light industrial uses. The site is designated within the adopted Proposals Map (2013) as Borough Employment Area ('BEA'), with a site specific reference 'BEA17'. Accordingly, and taking account of the wider scale of The Arch Company's portfolio, the potential implications of the Draft Local Plan are of significant importance. As such, our client has	Noted for consideration.

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Policy 10: Leytonstone Strategic Location				
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			a strong interest in ensuring that the Draft Local Plan creates the strong and ambitious planning framework it seeks to provide in order to facilitate the sustainable growth the borough requires.	
2900	Ms Carole Raeber		<p>The area around Leytonstone High Road Overground Station has quite a lot of outdoor space at the moment. We welcome the planned taller buildings in the area to increase population density but feel this area with its many arches has the potential to become a local hub. We'd like to see this area become a space where people come to and spend time (rather than being just a transition area where people commute through). We don't want the arches turned into (light) industrial spaces but rather communal areas: cafes, libraries, small shops.</p> <p>Leytonstone High Road is very polluted and it's not safe to cycle. We'd like to see this road being quieter to reduce air pollution in the area and big cycling lanes that run separate to the street. There are cycling lanes currently, but they are only drawn on the street and are located in front of parking lots, so cars pull in and out of the cycling lane. If this road is quieter, there is also more opportunity for shops to place sitting areas outside, at the moment this street does not invite anyone to spend more time there than absolutely necessary. More and bigger trees are needed too. We'd also welcome if all residential roads could be closed off. Because Leytonstone High Road gets crowded, people use the residential roads to get around the traffic. Cars often drive through these too fast. A prime example is Montage Road and Ferndale Road, which are used to avoid Leytonstone High Road. These residential streets should be closed off or at a very minimum be turned into one-way roads (they are too narrow for two cars to cross).</p>	<p>These comments are noted with regard to the strategic centres of Leytonstone and South Leytonstone. The Local Plan reflects the Council's commitment to TfL's Healthy Streets principles and the Mayor's Transport Strategy to provide low-traffic, liveable neighbourhoods.</p>

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Policy 10: Leytonstone Strategic Location				
ID	Full Name	Organisation	Comment	Council (Officers) Response
3015	The Arch Company		It is considered that the specific policy on the South Leytonstone Strategic Location provided on page 37 of the Draft Local Plan should be classified as an independent policy, i.e. Draft Policy 10, similar to those of other 'strategic locations' within South Waltham Forest which are indeed listed as 'free-standing' policies (i.e. Draft Policy 7 Lea Bridge and Church Road on page 34, Draft Policy 8 Low Hall on page 35, Draft Policy 10 Leytonstone on page 38, etc). It may be a formatting error, but for clarity it is requested to address this in a future iteration of the document.	Noted for consideration.
3016	The Arch Company		For the purposes of these written representations, our client 's comments in relation to the South Leytonstone Strategic Location are referred to as Draft Policy 9 (which also refers to Leyton Strategic Location). The Arch Company is supportive of the draft wording relating to the South Leytonstone Strategic Location. Providing a minimum growth target of 500 new homes is considered to be realistic. However, the policy should be worded flexibly enough to allow the detailed design of available and deliverable sites to determine the optimum number of new homes to be delivered which may be taking wider sites within the sub-area into consideration to comfortably exceed this minimum target.	Noted for consideration - in particular, the need for flexibility to allow the detailed design of available and deliverable sites to determine the optimum number of new homes to be delivered.
3017	The Arch Company		The direction of higher densities and taller buildings around Leytonstone High Road Overground station is strongly supported. Our client is pleased to see that the location of tall(er) buildings is plan-led and, as such, follows the intentions of the emerging Draft London Plan (i.e. see Draft Policy D8).	Support noted.
3018	The Arch Company		It is important to recognise that both a site's density as well as its maximum height should be design-led, as similarly advocated by the emerging Draft London Plan. Relevant policies contained in the Draft Local Plan should therefore avoid being overly prescriptive and allow the design process (in	This point is noted for further consideration.

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			combination with the required environmental and townscape/visual impact testing) to determine a site 's density, height and massing, as set out in Draft Policy 5 and supporting Paragraph 4.36 of the document which states that: In practice, however, the precise density for any individual site will be determined by its immediate context, on-site constraints, the type of development proposed and the need to provide an appropriate mix of dwellings or employment units to meet the community's needs.	
3019	The Arch Company		It is further positively received that the wording of the sub-area policy seeks a utilisation of existing employment land (including railway arches) for mixed-use intensification and co-location, including the provision of new workspace, light industrial (where appropriate), food and drink and offices.	Support noted.
3020	The Arch Company		Whilst we provide detailed comments on Draft Policy 44 (Railway Arches) below, it is supported that the area, including BEA17, is identified as a suitable location for 'co-location'. In line with our client 's aspirations, the proposed policy wording not only promotes mixed use developments including residential to allow for the planned housing growth to come forward as part of (former) industrial sites, but also a range of other supporting/ancillary uses within the existing railway arches, thereby allowing sufficient flexibility to accommodate the needs of a variety of businesses and occupiers, and our client is looking forward to working with the Council in establishing those for their sites, including BEA17	This point is noted.

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Policy 11: Whipps Cross Strategic Location				
ID	Full Name	Organisation	Comment	Council (Officers) Response
915	Mr Mathew Frith		Parts 5,7 and 18: We support these.	Support noted.
973	The City of London	The Conservator's of Epping Forest	Board papers recently considered by the Barts Health NHS Trust suggest public consultation will shortly consider proposals for up to 1,400 new dwellings within the existing Hospital footprint that would help fund the comprehensive redevelopment of the ageing hospital. It is likely that the density of these dwellings will generate very little new Public Open Space within the site, which will place additional pressure on Hollow Pond and Leyton Flats, which is already noted as Epping Forest's most heavily visited site.	Noted for consideration as part of Epping Forest Special Conservation Area Mitigation.
1061	Ms Alison Blom-Cooper	Planning Department Epping Forest District Council	Policy 11: Whipps Cross Strategic Location (8): see comments above regarding the potential for increased pressure arising from visitors.	Noted for consideration.
1601	Bob Bennet		Priority 2: No reference is made to the need for the protection and conservation of the historic buildings on the site in any future redevelopment.	Noted. References to heritage assets will be included in the policy.
1862	Mike Chrimes		Whipps Cross Hospital: The current plan suggests the Council see the site as a development opportunity rather than a means of delivering high quality health care for the 21st century, safeguarding jobs and providing homes for vital workers. Latest suggestions are it will have less beds for a growing population and specialise in care for the elderly despite the growth of young people in the south of the borough.	The Strategic Location consider the wider area and seeks to re-provide the hospital alongside new homes.
1941	Tony Thorne		We are advised that there is consultation on the redevelopment of Whipps Cross Hospital (this being during the working day thus restricts the access by the working population) and whatever is decided will result in at least ten years (example the Royal London Hospital redevelopment) before the capacity	Noted for consideration.

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			being available plus during the development period will result in major disruption to access to the existing facilities and services. In fact it would appear that poor planning over the last decade has exacerbated the problem and as can be seen from history poor health provision results in increased antisocial behaviour.	
2897	Ms Mary Holden		Whipps Cross should lead the way by being carbon neutral. Westfield Stratford City has extensive use of Pavegen floor tiles. The floors produce kinetic energy from people who are walking on them. The floors then turn the kinetic energy into electricity. Could this be possible in the hospital and/or any other new buildings? Solar panels should be installed and trees planted in the grounds. I am also concerned about the possible effect of redevelopment on the adjoining Leyton Flats (aka Hollow Ponds) area of Epping Forest. Has an ecological assessment report been carried out?	This point is noted for consideration as it primarily relates to matters in the design and planning application process. The Local Plan is supported by a robust Habitats Regulations Assessment, which assesses the impact of plan proposals on the environment.
2906	Barts Health NHS Trust		Achievement of minimum growth targets of 1,700 new homes The criteria in the draft policy are introduced by the following text: "Development in the Whipps Cross Strategic Location over the Plan period will deliver the following priorities:" However, it is unclear exactly which land is included in the Strategic Location and therefore where the Council envisages that this scale of development would be accommodated. On page 31 of the draft Plan the Whipps Cross Strategic Location is indicated by a broken circle (see Figure 1). Whilst this is presumably intended to be indicative, a not insignificant part of the area within the circle crosses into Epping Forest Special Area of Conservation ('SAC') where housing development would not be acceptable. It also takes in an area of largely residential development between Lea Bridge Road, Essex Road and James Lane where, other than the Hospital site, there are no other obvious large sites for development. It is therefore unclear	The boundary line as drawn is indicative. Rather than implying that the whole area as drawn will be developed, it draws attention to the immediate functional area for planning purposes, within which locational policies to manage growth and change will apply. In this case, the boundary extends to parts of Epping Forest SAC so the need to sensitively manage the impacts of growth occurring on suitable sites within the indicative boundary clearly becomes an important consideration. It is proposed to clarify this point in the plan for better interpretation.

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			<p>exactly where, other than the Hospital site, significant housing delivery might take place. If a strategic location is meant to be a focus for development and potentially large-scale change, it must be identified more clearly in the development plan to create certainty - and also to remove uncertainty for those, such as the residents in individual dwellinghouses around the Hospital site, who will no doubt be very concerned that their homes might be included in an area where redevelopment is envisaged. Barts supports the Council's aims to boost the supply of housing in the borough to address objectively assessed needs and recognises that this will need a step change in delivery compared with the previous plan period (given the increased London Plan targets). However, we are unclear from this draft plan and the supporting documentation as to how conclusions have been drawn in respect of the Whipps Cross Hospital site. In particular we are unclear how the Council has calculated the development capacity of land in the Whipps Cross Strategic Location. It is also unclear whether any viability assessment sits behind the proposed allocation. This is a crucial consideration because it is not always the case that denser or taller development will yield returns to make the delivery of such worthwhile. Rather, one must examine likely land values and the local housing market whilst also factoring in build costs and policy requirements (for example open space) and other costs such as the Community Infrastructure Levy. Reaching a firm conclusion in this respect is a significant undertaking. Barts is still at the stage where it is identifying the optimum arrangement of the site for new hospital development (whilst maintaining continuity of services at all times) before it explores opportunities for other land uses, including housing, in order to gauge and model possible receipts for investment in a new healthcare environment. Whilst it is clear that accommodating</p>	

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Policy 11: Whipps Cross Strategic Location				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			<p>a major new hospital as well as a large number of new homes will inevitably result in a relatively high-density development, Barts is not currently in a position to either agree or disagree with the Council's current estimate of residential capacity because further work will be needed to ensure that a higher-density can be satisfactorily accommodated in this location; it should be made clear that any figure that is included in the emerging plan is indicative until such time as a detailed assessment has been undertaken. However, Barts is committed to continuing to work with the Council in this regard to ensure, so far as is possible, that this part of the emerging Local Plan is positively-prepared and justified - and also to ensure that the development of surplus land for residential use is optimised.</p>	
2907	Barts Health NHS Trust		<p>Comprehensive redevelopment of Whipps Cross Hospital area of change as a state-of-the-art University Hospital This criterion refers to the 'Whipps Cross Hospital area of change' which is not a definition used elsewhere in the emerging Local Plan. Consistent and clear terminology must be used throughout the Plan to provide certainty in the application of policy. Whilst it is Barts' aspiration to achieve the comprehensive redevelopment of the out-of-date buildings and to optimise the use site, it must be borne in mind that development is dependent on government approval - which pays close regard to affordability. These considerations may dictate that some existing buildings (particularly recent buildings in better condition) will need to be retained. If this is the case then it may not be possible to achieve comprehensive redevelopment. We request that greater flexibility be added to this criterion and that it requires the optimisation of the use of the site for healthcare, residential and supporting / related uses.</p>	<p>These comments are noted for further discussion prior to the next stage of the Local Plan.</p>

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Policy 11: Whipps Cross Strategic Location				
ID	Full Name	Organisation	Comment	Council (Officers) Response
2910	Barts Health NHS Trust		Barts' aspiration is to bring forward a new 'place' in the borough that provides an excellent healthcare environment complemented by a new, high-quality neighbourhood with a range of day-to-day services for hospital users, staff and local residents. It is widely accepted that quality in new environments is often derived from an understanding of local distinctiveness. However, such new environments will often, and necessarily, be of a different character to the prevailing character. This is likely to be the case at Whipps Cross where the prevailing character is turn-of-the-century suburban with a relatively consistent building height (particularly if what is meant by 'Whipps Cross' is the area within the circle on Figure 1). Including a requirement to reflect local character could be at odds with the requirement to optimise the potential of the Hospital site. Rather, we request that the draft policy be re-worded to seek place-making principles that draw on the character and local distinctiveness of Whipps Cross.	The proposed change is noted for consideration. The draft Local Plan contains a range of policies to guide growth and transformation of local areas to ensure that new development makes a positive contribution to the local environment and where justified allows for the evolution of new character.
3021	Barts Health NHS Trust		Barts supports the Council's aims to boost the supply of housing in the borough to address objectively-assessed needs and recognises that this will need a step change in delivery compared with the previous plan period (given the increased London Plan targets). However, we are unclear from this draft plan and the supporting documentation as to how conclusions have been drawn in respect of the Whipps Cross Hospital site. In particular, we are unclear how the Council has calculated the development capacity of land in the Whipps Cross Strategic Location.	The growth target included in the plan for local areas is based on evidence from the Growth Capacity Study 2019, which considers the capacity of identified sites in local areas to deliver the proposed targets. This is an indicative target. In considering development proposals, other factors including site specific conditions and other policy constraints will also apply. The Council is preparing a separate Site Allocations Development Plan document, which will include this strategic site and which will be consulted on later in 2020.
3022	Barts Health NHS Trust		It is also unclear whether any viability assessment sits behind the proposed allocation. This is a crucial consideration because it is not always the case that denser or taller development will yield returns to make the delivery of such worthwhile. Rather, one must examine likely land values and the local housing	The sites mentioned in the document have been identified as examples of under used sites with potential for redevelopment. The Council is preparing an additional Local Plan document on site specific allocations. This will identify the full list of sites being considered and provide further details on density, height,

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Policy 11: Whipps Cross Strategic Location				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			market whilst also factoring in build costs and policy requirements (for example open space) and other costs such as the Community Infrastructure Levy. Reaching a firm conclusion in this respect is a significant undertaking.	deliverability and viability. This new document will provide opportunity to apply the policies of the plan on specific sites as identified, providing more details on how new developments could be implemented.
3023	Barts Health NHS Trust		Barts is still at the stage where it is identifying the optimum arrangement of the site for new hospital development (whilst maintaining continuity of services at all times) before it explores opportunities for other land uses, including housing, in order to gauge and model possible receipts for investment in a new healthcare environment. Whilst it is clear that accommodating a major new hospital as well as a large number of new homes will inevitably result in a relatively high-density development, Barts is not currently in a position to either agree or disagree with the Council 's current estimate of residential capacity because further work will be needed to ensure that a higher-density can be satisfactorily accommodated in this location; it should be made clear that any figure that is included in the emerging plan is indicative until such time as a detailed assessment has been undertaken. However, Barts is committed to continuing to work with the Council in this regard to ensure, so far as is possible, that this part of the emerging Local Plan is positively-prepared and justified and also to ensure that the development of surplus land for residential use is optimised.	This point is noted.

Policy 12: Bakers Arms Strategic Location				
ID	Full Name	Organisation	Comment	Council (Officers) Response
916	Mr Mathew Frith		Part 8: We support this.	Support noted.

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Policy 12: Bakers Arms Strategic Location				
ID	Full Name	Organisation	Comment	Council (Officers) Response
1123	Stagecoach		Stagecoach support the proposed target for 850 new homes	Support noted
1124	Stagecoach		Stagecoach support the principle of higher densities and taller buildings around Leyton Midland Road Overground Station, as a key transport hub. However, Stagecoach suggest that recognition should also be afforded to other appropriate sites capable of accommodating higher densities and taller buildings, such as those in sustainable or prominent locations. To ensure the Plan is sound in that it is effective, it should provide a range of specific locations appropriate for higher densities and tall buildings so that the housing targets for this area are achieved. We would recommend that specific reference is made within the Plan to the Leyton Bus Depot site.	Noted. The Council will be working on a Site Allocations Development Plan Document, masterplans and an Urban Design Supplementary Planning Document where more guidance on heights will be given.
1127	Stagecoach		Stagecoach recognises the potential for a mix of uses to be delivered within Bakers Arms, however, suggest that the wording for this part of the policy could be made clearer by identifying priority locations for such uses, i.e. within the district centre boundary.	Noted for consideration.
1128	Stagecoach		Stagecoach support the retention of the existing district boundary designation.	Support noted.
1129	Stagecoach		Stagecoach are currently undertaking a review of their assets and have identified the Site as having development potential, which is being explored. With this in mind, Stagecoach are fully supportive of the proposed inclusion of the Leyton Bus Depot within Policy 12 as a potential development opportunity. Notwithstanding, Stagecoach consider there to be the opportunity for the Site to be further recognised within the new Local Plan through the inclusion of a site specific policy allocation for the redevelopment of the Site.	Noted for consideration.

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Policy 12: Bakers Arms Strategic Location				
ID	Full Name	Organisation	Comment	Council (Officers) Response
1130	Stagecoach		Stagecoach agree with the principle of establishing a primary shopping area and support the proposed flexible approach to uses outside of the primary shopping area.	Support noted.
1131	Stagecoach		Stagecoach support the principle of shopfront improvements within Bakers Arms.	Support noted.
1132	Stagecoach		Stagecoach note the importance of high quality design and place-making in achieving sustainable development and are, therefore, supportive of the principle of this part of the policy.	Support noted.
1133	Stagecoach		Stagecoach support the principle of the protection and enhancement of the Bakers Arms Conservation Area.	Support noted.
1134	Stagecoach		These policies are recognised to be generally consistent with national planning policy and the Draft London Plan and are, therefore, supported by Stagecoach.	Support noted.
2477	London Hotel Group	London Hotel Group	We also note that the site falls within the 'Bakers Arms Strategic Location', in which Policy 12 seeks to achieve a minimum of 850 new homes across the plan period, deliver higher densities and tall buildings around Leyton Midland Road Overground station, and apply placemaking principles based upon the character of the area. We note that the Council has recently published the Waltham Forest Character and Intensification Study (August 2019) - commented upon below - with a view to managing intensification and transformation of areas. The emerging proposals for the Site therefore align with the priorities of the Council for this Strategic Location through the delivery of new homes, improvement employment opportunities and intensified development sites that deliver quality architecture, public realms and, more generally, safer and more attractive places	Noted for consideration.

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Chapter 6: Central Waltham Forest				
ID	Full Name	Organisation	Comment	Council (Officers) Response
1	Ms Laura Gilbert		There's currently one bus route along Forest Rd from Blackhorse Rd and one up Blackhorse Lane. Greater frequency of buses needed to better connect the various centres - not everyone is able to walk or cycle. Policy 13 M - why do you say 'in particular Wstow Central & St James St', when the section on Blackhorse Lane states that a greater sense of arrival is needed? Please don't let Blackhorse Rd station be the poor relation. Re Blackhorse Lane: Agree that sense of arrival at Blackhorse Lane area needs improvement & that more cafes s/food outlets needed - currently hardly any, which lets the area down.	Noted. Include Blackhorse Lane in Policy 13 Point M.
100	Carrie Deane		Wood Street is my local borough. The only benefit I see is protecting the Georgian Village.	Noted. The Wood Street area falls within the Central Area of Waltham Forest. This is designated by the London Plan as being an area for strategic regeneration. This will centre around the vibrant High Street feel indoor market independent small businesses and its street art, and the independent retailers, with improvements to the public realm and open spaces. Further details of this are in Policy 16.
103	Carrie Deane		Can you please direct me to a part of the consultation that will benefit Wood Street and its residence?	Noted. The Wood Street area falls within the Central Area of Waltham Forest. This is designated by the London Plan as being an area for strategic regeneration which will centre around the vibrant High Street feel indoor market independent small businesses and its street art, and the independent retailers, with improvements to the public realm and open spaces. Further details what is entailed in the strategic regeneration of the Woodstreet area is set out in Policy 16.
133	Shelly Shenker		Overall, very positive changes proposed, in support of improved/more housing, employment opportunities and businesses.	Noted. Support Welcomed.
134	Shelly Shenker		Unclear from the plan what might be lost and what exactly would change and if there are any potential drawbacks to the changes and how mitigated (this might be in the full plan but not read this!), Walthamstow Town Centre.	Noted. The site allocations document detailing the sites that are due to come forward in the Local Plan period is being drafted as a separate exercise. This will be published for the three stages of public engagement consultation and examination by the

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ID	Full Name	Organisation	Comment	Council (Officers) Response
				appointed planning inspector. Development principles that will apply to the specific sites made in the site allocations documents are detailed in this plan.
135	Shelly Shenker		The plan needs to ensure that it protects and promotes the life of people who are vulnerable or who have disabilities and facilities.	Noted. In Chapter 8 of the Draft Local Plan, Policy 28 ensures that all new development that will be delivered in the Plan Period will be accessible and adaptable for wheelchair users. Paragraph 12.24 highlights the increase in the number of residents requiring special education needs and disability with accessibility and inclusiveness being a key factor in both mainstream and specialist schools.
136	Shelly Shenker		Walthamstow Town Centre: Support refurbishment of the St James Street health Centre.	Noted. The condition of buildings is not an issue covered by the Local Plan.
137	Shelly Shenker		Blackhorse Lane: Increase number of entrances to Walthamstow Wetlands (if this is in Council control). Would improve walking route to Tottenham Hale.	Noted. Policy 15 (Blackhorse Strategic Location) point 6 and point 8 state that as part of the development in the Blackhorse Strategic Location, improvements to the public realm including permeability to Walthamstow Wetlands will be delivered.
205	Hayden Bannochie		Blackhorse Lane: More retail spaces are needed: Currently only three small grocery shops in the area When more residential properties are built new residents will need access to more grocery shops. Currently these shops charge a premium as there are no/or few alternatives.	Noted. The retail offer in the Blackhorse Lane area is set to be improved over in the new Plan Period as part of the regeneration project that started in the current plan period.
206	Hayden Bannochie		Blackhorse Lane: Real lack of casual dining options in the area. Yasars Kebab House is really reaping the benefits of this. Again charging premium prices. New gentrification wave residents will want and need spaces for alternatives for dining. These should not be franchised outlets such as Pizza Express or Nandos. They should be small business that reflect the entrepreneurial spirit of the area.	There are several casual dining options in the Blackhorse Lane area towards the Blackhorse Road / Forest Road Junction. The Local Plan is supportive of applications for new shops and cafes in this area.

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207	Hayden Bannochie		Blackhorse Lane needs commissioned murals. There are many spots that are just grey spaces that could really be transformed with public art.	Noted. Policy 15 (Blackhorse Strategic Location) point 6 and point 8 state that as part of the development in the. Blackhorse Strategic Location, improvements to the public realm. Policy 45 (Promoting Culture and Creativity) States that Section 106 contributions will be sought for public art projects.
208	Hayden Bannochie		Blackhorse Lane: Old industrial complexes need to be transformed into versatile retail spaces. See the Howdens and dignity funerals area. Blackhorse Lane needs more B1 units to created that are multifunctional spaces (see yonder as an example).	Noted. The delivery of retail space in the Blackhorse Lane area will be generally supported by The Council.
224	Clare Montgomery		St Peters In The Forest needs toilets.	The plan contains policies encouraging the provision of supporting social and community facilities in new development - including free publicly accessible toilets. See policies 58 and 85 of the Draft Plan.
236	Valerie Muscutt		Plans to build on spaces near Walthamstow Central.	Noted. Walthamstow Central has been identified as a key strategic location in the draft Local Plan, the council will be supportive of appropriate development opportunities that come forward in this location.
375	Dr Jonathan Reades		Although I broadly agree with the ambitions set out in the Vision, these should be predicated on regular local consultation - navigating resistance to change can be challenging, but resident buy-in is important, and the borough must be able to clearly demonstrate rationales underpinning planning and development decisions. It is *not* enough to simply retreat into "This is permitted development because the plan doesn't rule it out" when controversial developments are put forward: the Local Plan is the critical avenue for ensuring that developers understand what is likely to be approved before they bring forward proposals that 'push the boat out', while residents should have confidence that the local character (density, massing, land use, etc.) will be preserved except where an	Regular local consultation on planning issues has been taking place. The Council is bound by law to publicise applications submitted for planning permission. Regarding the development plan, the Council is also required to consult at different stages of the plan making process. The Council has adopted and published a Statement of Community Involvement setting its policy on planning consultation. There are public engagement events at every stage of the development and examination of the emerging Local Plan and all full planning applications open for public consultation too. Permitted Development rights are an area where the Council has less control on the types of development coming forward.

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			overriding interest in borough development can be demonstrated.	
398	Mr Tomasz Fiszer	WVRA Committee Member Walthamstow Village Residents Association	There are over 20 businesses in Orford Road most of whom are independent, local and support the evening economy and more within the adjacent area, most of whom serve not only the local community, but also visitors from across the borough and further afield. Orford Road in Walthamstow Village exemplifies the "neighbourhood centre", as defined in the superseded Planning Policy Statement 4: Planning for Sustainable Economic Growth (December 2009). Orford Road Walthamstow Village should therefore be captured in the Local Plan as one of the "neighbourhood centres" (refer to map on page 45 in the draft Local Plan). We note that the "neighbourhood centre" is not defined in the glossary of the document.	Policy 47 establishes the hierarchy of centres in Waltham Forest. Paragraphs 11.5-11.7 further clarify/define the role of the designated centres including neighbourhood and local retail parades. The comment made about the need to define these terms in the Glossary section of the Plan is noted for consideration.
413	Dr Jonathan Reades		Blackhorse Lane: In reviewing the comments on this document I read with real concern the feedback of Mrs. Juliemma McLoughlin regarding the limitation of retail provision at Blackhorse Lane: as the borough's planners will presumably be well-aware from visiting the area, Blackhorse Lane is nowhere near having enough retail provision to provide for current residents, let alone to compete with the Walthamstow or Leyton town centres. There are a total of two supermarkets catering to the entire Higham Hill ward (well, there's one at the far end of Blackhorse Lane too but it's not near the Tube or most residents) and one of these caters largely to the student population in adjacent flats. Neither provides a wide range of staples at affordable prices and the population of this area is growing rapidly. Whilst I do not wish to see a willy-nilly proliferation of phone and betting shops, if the council is to deliver on its ambitious plans for the area to be a 'gateway' to the borough it is going to need to allow for significant	Noted. The plan supports development of retailing opportunities and providing affordable workspaces across the borough in particular in the Blackhorse Lane Area. Betting shops are classified under a different usage class (Sui Generis) and not A1 (Retail) so applications for such premises will be reviewed under a different set of criteria. An assessment of the need for retail floorspace during the plan period (up to 2035) has been undertaken as part of the Waltham Forest Retail & Town Centres Study 2019. This assessment indicates that, when current retail floorspace commitments are taken into account, there is no need to plan for an increase in retail floor space provision up to the period 2029. That said, the Plan encourages local development opportunities for retail and other main town centres uses in individual centres where they can maintain and enhance the overall health of a centre.

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			expansion of retail opportunities in the area and I would hope that these would be a balance of small, affordable shops offering opportunities for makers and other start-ups, and larger floor plates to provide better residential infrastructure (I don't need a new kitchen every few days, though I appreciate that this fits with the larger pattern of DIY/Builders shops along this road).	
428	miss kam dhenjan		No, I do not agree with developing high density high rise blocks in the Blackhorse road area particularly and by Walthamstow central station. The high rises are spoiling the look of the area and its original appeal. There is insufficient transport for the expected increase in traffic. How will the Victoria line and Overground cope with increased traffic?!. It's already very busy pushing to get on transport, combined with housing developments in St James St area the quality of life is rapidly declining for local residents. Pedestrian traffic in the Blackhorse area has already increased markedly. I particularly strongly disagree with the high density block next to Blackhorse Road (opposite the former 'Standard'). It is and will create an ugly sight and there are already several high-rise blocks a few minutes on the ferry lane. Walthamstow Town Centre: The green areas should be maintained in an already busy area surrounded by cars.	Noted. The taller buildings in the Blackhorse Road area were approved under the Council's 2012 Adopted Core Strategy and form part of the regeneration of the Blackhorse Lane area. Taller buildings are a response to the increased demand for residential development in the borough.
434	Ira Dubinsky		The Central area includes many distinct neighbourhoods each with their own character and potential opportunities for growth and evolution. I like how the vision acknowledges this and describes each area differently. I live in Higham Hill and I like the description of Blackhorse Lane as the "borough's first Creative Enterprise Zone" - this very much resonates for me.	Support noted.
467	MR Tushar Kelkar		There is too little emphasis on nurturing the central area into a desirable area in which to stay, rather than merely commute elsewhere in London - no emphasis on making the area a	Noted.

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			desirable area in which to spend time, but rather a mini commuter village for other areas of London.	
475	Ms Alison Hill		Walthamstow Town Centre: 8,000 new homes seems excessive. Retaining and encouraging the creative hub is good as well as having cultural and creative activities but the evening culture around the town centre could be extremely noisy for all the hundreds of residents who will be jammed into the new tower blocks, as well as those already living nearby.	Noted. The housing numbers that have been calculated for the Plan and approved by the Council, are a direct response to the Objectively Assessed Housing Need (OAHN) which was identified in the Strategic Housing Market Assessment (SHMA). The number of dwellings that the council is planning for is a direct response to the housing affordability and supply challenges that exist in the borough. Support for the Creative Enterprise Zones is noted and welcome. With regards to the Town Hall Campus, the current fountain arrangement is non-compliant with regulations regarding attendance and its depth.
525	Ms Georgina Chimarrides		Blackhorse Lane: The Blackhorse Lane strategic location boundary should be extended to include the Higham Hill area which makes up the majority of the existing residential community near Blackhorse Lane. This will support with integrating the existing and new communities that will arrive in the area, and ensure that any new community, retail or social offer can respond to local needs. Due to the physical barriers of the Wetlands, the Reservoirs and the North Circular, Higham Hill naturally forms part of Blackhorse Lane, which includes the nearest underground and Overground station to Higham Hill, and in the near future will provide key local amenities and a social offer which are currently lacking in the area.	Noted. The boundary of the Blackhorse Strategic Location is drawn around where the majority of development and transformation is expected to take place in the plan period. Higham Hill is not purposely identified for this reason.
815	Ms Tessa Craig		The Lee Navigation is not mentioned in the description / vision for Central Waltham Forest. It should be included in part K.	Noted. We will amend the plan to mention the River Lee Navigation as well as the River Lea.
974	The City of London	The Conservator's	The Area Profile (pages 42-43) and Vision for Central Waltham Forest (page 44) fails to acknowledge the presence of Epping Forest Land at Canada Plain and Gilberts Slade. Similarly, at	Noted. Amend the plan to acknowledge the presence of Epping Forest Land at Canada Plain and Gilberts Slade and strengthen commitments to public open space improvements in Point J.

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		of Epping Forest	page 46 the summary for Central Waltham Forest falls short of committing to public open improvements at J (page 46) referencing only the public realm.	
1150	Blackrock and NEAT Development		The New Local Plan notes (Paragraph 6.9) that "Blackhorse Lane is an area which has been transformed", in our view whilst we would agree that the area is positively changing, we would suggest that the wording is amended to recognise the fact that the transformation and regeneration of the area is ongoing and not complete. Our suggested wording is as follows: "Blackhorse Lane is an area which has been transformed is undergoing transformation. It is defined currently characterised by the new housing led mixed use developments and the emerging creative industries including Blackhorse Workshop, Gnome House and the new developments at Station Hub and Sutherland Road. All supported by public realm and transport improvements, and framed by the waterside setting provided by Walthamstow Wetlands which opened to the public in 2017 following a major National Heritage Lottery Fund restoration project."	Noted. Support Welcomed. It proposed to amend Paragraph 6.9 to read: "Blackhorse Lane is an area which is undergoing transformation."
1151	Blackrock and NEAT Development		We are broadly supportive of the New Local Plan's prescribed vision for the area (pp.44) and we particularly welcome the intention to ensure "Blackhorse Lane will continue to support Waltham Forest's creative economy and become a catalyst bringing in new jobs, new quality homes, shops and cafes forming a creative living and working community, alongside the existing and regionally significant light industrial, manufacturing and production uses." [our emphasis]	Noted. Support welcomed.
1153	Blackrock and NEAT Development		We also broadly support the key approaches for Central Waltham Forest (including on pp. 46 parts A.- M.) we are particularly supportive of parts C and D. It is noted that the area is expected to deliver a minimum of 8,000 new homes and 1,600 new jobs (part A.). Whilst we welcome setting a minimum target, However, we question whether this target could be	Noted. Support welcomed. Housing and employment targets are subject to evidence-based assessments and will be updated if this is found to be necessary in for the next version of the plan.

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			more ambitious in order to better capitalise on the high transport accessibility, presence of several retail centres and employment areas and availability of underutilised brownfield land. In our view this would remain consistent with the objectives of the NPPF centred around making the most effective use of land.	
1154	Blackrock and NEAT Development		More generally, in its current format we consider it unclear as to whether the approaches included on page 46 form a specific standalone policy or not, it is requested that the Council clarifies this point in the next iteration of the Plan.	Noted. For clarity the approaches included on p46 of the plan are the vision for the central part of the borough. The borough has been split into three strategic planning areas; this approach was chosen in recognition of the transition that the borough has from its inner urban character to its external suburban into rural characteristic towards its outer edge boundary.
1155	Blackrock and NEAT Development		Separately, we request that Paragraph 6.11 is amended to reflect the central area of the borough (as opposed to the south) and the Council's aspirations for optimising its identified strategic locations, particularly those with high transport accessibility, such as Blackhorse Lane. Our suggested wording is as follows: "Development and good growth should be based on place-making principles using the character, heritage and culture of the area. The south central area of the borough has important gateway locations, such as Blackhorse Lane and Walthamstow town centre, which should be celebrated and create a sense of arrival in the borough. The central area provides a good opportunity for continuing growth and regeneration to deliver new homes and jobs in a broad range of sectors with a focus on the creative and cultural industries."	Noted. The Council will consider the amended wording in the next version of the Plan. Amend text to: "Development and good growth should be based on place-making principles using the character, heritage and culture of the area. The south-central area of the borough has important gateway locations, such as Blackhorse Lane and Walthamstow town centre, which should be celebrated and create a sense of arrival in the borough. The central area provides a good opportunity for continuing growth and regeneration to deliver new homes and jobs in a broad range of sectors with a focus on the creative and cultural industries."
1221	Rosie Sterry	Transport for London - Commercial Development	TfL CD strongly agree with part (c) of the box entitled 'Central Waltham Forest' and support colocation, especially building new homes alongside employment and public transport infrastructure uses.	Noted. Support welcome.

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1222	Rosie Sterry	Transport for London - Commercial Development	TfL CD also strongly support part I of this box to “promote Walthamstow Central as an important transport interchange in the borough and outer London and support its enhancement”. However, we suggest that this section is more explicit in acknowledging the potential of Walthamstow Central station to undergo redevelopment in the future and its capacity to contribute to the borough’s housing needs. We therefore propose that the policy reads: “Promote Walthamstow Central as an important transport interchange in the borough and outer London and support its potential for redevelopment and enhancement.”	Support Welcome. Amend policy to mention the potential of "Walthamstow Central as an important transport interchange in the borough and outer London and support its potential for redevelopment and enhancement".
1280	Josephine Vos	Transport for London - City Planning	This section states that proposals will be supported where they encourage an improved cycling and pedestrian network. It is not clear how a development proposal would ‘encourage’ improvements in infrastructure. We would suggest using a term such as ‘support’, ‘facilitate’ or ‘deliver’.	Noted. Agree. Change text to read 'support', 'facilitate' or 'deliver'.
1281	Josephine Vos	Transport for London - City Planning	We would welcome a similar reference to public transport improvements, including bus services.	Noted. Include references to improved public transport.
1542	Mark Furnish	Sport England	The policies also contain some aspects of Active Design, for example walking, cycling and public realm improvements. However, Sport England recommend that the policies incorporate all the principles and provided links to the Active Design guidance so that developers/applicants can be informed how to ‘design in’ activity into developments. Achieving well-designed active places would assist the Council in improving the health and well-being of residents and visitors.	Noted. It is proposed to incorporate the principles included in the Active Design Guidance as suggested by Sports England.
2176	Capital and Regional Plc	Capital and Regional Plc	We support LBWF’s vision for Central Waltham Forest (including Walthamstow Town Centre), where LBWF will seek to deliver a minimum of 8,000 new quality homes and 1,600 new jobs, whilst promoting Walthamstow Town Centre as the creative and economic hub of the borough.	Support welcome.

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2945	Dr Jonathan Reades		<p>Decisions based on crude targets (e.g. 8,000 new homes) should be deemphasised in favour of a holistic view of an area's character, opportunities, and plan. I assume that this is Policy 13? I don't see how 'B' is entirely practical for creative industries (unless you're including the cinemas) given rising costs of retail and commercial space. It is an obvious hub for the borough, but costs seem to be driving out independent retailers and this is a characteristic of 'new build'. The borough should explicitly balance the opportunities for densification (e.g. for housing around major transport hubs) with the benefits of cheap space (e.g. spaces that are easily repurposed for different uses based on changing industrial and creative needs; new build does not support this because developers typically re-let 'workspaces' at much higher rents than prior to redevelopment). Where they are of decent quality or can be restored (e.g. Gnome House) you should seek to protect the *buildings* in the Blackhorse Lane area even where they are, by contemporary standards, awkward or poorly designed. I feel very strongly that redevelopment efforts, while well-intentioned, may destroy the very features of the neighbourhood that make it attractive to 'makers' and artists. Both of these groups need large, cheap workspaces and that is *exactly* what commercial redevelopment at scale does *not* provide: instead, you get 'artists studios' or something that sounds nice on the planning application and looks good in the mock-ups, but which is completely unaffordable by *actual* artists or makers. You can look to Hackney/Hackney Wick to see what happens: most of the workspaces are gone, or so expensive that only trust-funded 'artists' can afford them! Creative re-use of existing spaces (e.g. Yonder, Wildcard) avoids the eviction of neighbouring tenants (various building suppliers, etc.) and allows for experimental or risky businesses to get a</p>	<p>The decision on the quantum of housing development in the Plan Period in the borough is based on a decision that balances the character of the borough with the objectively assessed housing need which is driven by the estimated demographic growth targets. The Plan seeks to protect statutorily and locally listed heritage assets wherever possible. Although in some instances due to the deterioration of old buildings this is not always possible or cost effective if the buildings have been vacant for some time and have been damaged. Policies, 15 (4), 41 (E) seek to ensure that there is provision of affordable workspace. This is a priority in new development in the borough specifically in the Blackhorse Lane area.</p>

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			<p>toe-hold. Wholesale redevelopment destroys that by producing small, expensive spaces that are quickly converted to chain-shops or high-volume businesses.</p> <p>Blackhorse Lane: Please see my comments on development principles in general as most of these pertain to Blackhorse Lane especially. The key parts are: I feel very strongly that redevelopment efforts, while well-intentioned, may destroy the very features of the neighbourhood that make it attractive to 'makers' and artists. Both of these groups need large, cheap workspaces and that is <i>*exactly*</i> what commercial redevelopment at scale does <i>*not*</i> provide. Creative re-use of existing spaces (e.g. Yonder, Wildcard) should be strongly preferred as it avoids the eviction of neighbouring tenants (various building suppliers, etc.) and allows for experimental or risky businesses to get a toe-hold because running costs are much lower. Wholesale redevelopment destroys that by producing small, expensive spaces that are quickly converted to chain-shops or high-volume businesses.</p>	
2946	Dr Jonathan Reades		<p>Regarding Blackhorse Lane, please see my comments on development principles in general as most of these pertain to Blackhorse Lane especially. The key parts are: I feel very strongly that redevelopment efforts, while well-intentioned, may destroy the very features of the neighbourhood that make it attractive to 'makers' and artists. Both of these groups need large, cheap workspaces and that is exactly what commercial redevelopment at scale does not provide. Creative re-use of existing spaces (e.g. Yonder, Wildcard) should be strongly preferred as it avoids the eviction of neighbouring tenants (various building suppliers, etc.) and allows for experimental or risky businesses to get a toe-hold because running costs are much lower.</p>	<p>Policies, 15 (4), 41 (E) seek to ensure that there is provision of affordable workspace. This is a priority in new development in the borough specifically in the Blackhorse Lane area.</p>

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2947	Dr Jonathan Reades		While I broadly support in-fill and brownfield development, siting large buildings on small plots in terraced areas, or allowing the conversion of inappropriate office space (I realise there are some issues with central government policy here, but that's in the absence of a local or neighbourhood plan, I believe) to housing should be preventable by reference to clear guidance in the Local Plan. Spaces that are quickly converted to chain-shops or high-volume businesses. And while I am generally in favour of the densification of land use around the Station, I do think that real consideration needs to be given to the impact of an additional 1,700 homes on the area: housing densities above the norm (i.e. terraced housing, no more than 2 separate units via subdivision of the house) should be confined to the areas closest to Blackhorse Station. In all other areas, residential densities should be consistent with adjacent buildings/nearby norms and building style, massing, density, etc. should be required to be consistent even if what is currently there (as a presumably non-residential use) does not conform.	The concern raised about the impact of growth on local character is recognised - that new development could become inappropriate to the existing local context. The draft Local Plan contains a range of policies to guide growth and change and to ensure that new development is carried out in harmony with its setting and makes a positive contribution to the local environment. See Policy 5 (Approach to Intensification and Policy 62 (High Quality Design) and Policy 63 (Tall Buildings). Other policies also consider amenity and other issues relating to local character. All of these policies are considered in decision making, ensuring that an appropriate balance is maintained between competing objectives and that new development is sensitively designed.
2948	Mr Tomasz Fiszer	WVRA Committee Member Walthamstow Village Residents Association	Located within Walthamstow, where the evening economy is designated of regional importance (refer par. 6.2 of the draft Local Plan), Orford Road and surrounding Walthamstow Village fulfils some of the strategic assumptions of the Local Plan. Walthamstow Village has a very vibrant and diverse community, represented by the Walthamstow Village Residents Association. The Association is a not-for-profit organisation that runs an extensive programme of annual events that are enjoyed not only by the local residents, but also by the wider community of Walthamstow. The Association is actively involved in maintaining and improving the public realm, in form of the volunteer-run urban greening maintenance and development, regular public space cleaning and maintenance of the street	This is noted. Reference will be made to Orford Road and the surrounding Walthamstow Village.

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			furniture and close liaising with the Council on the issues related to the public spaces. The vibrant and active community is a major factor in attracting both visitors and new inhabitants into the area. It is also seen as a model for other growth areas and communities developing within the borough and it is therefore crucial that the above is recognised in the document, so that the existing community can be maintained and supported in the future (refer to page 44 - Vision for the Central Area).	
2949	Mr Tomasz Fiszer	WVRA Committee Member, Walthamstow Village Residents Association	Ravenswood Estate, originally an industrial estate, has in recent years become home to a number of independent businesses (including local breweries and a gin distillery), increasing the Central Waltham Forest's evening and night-time economy. This estate is home to God 's Own Junkyard, which has become a London wide attraction and destination. It is crucial that the character of Ravenswood Industrial Estate as an evening and night-time economy destination and a place for creative industries and local businesses to operate from, is correctly captured and referred to in the draft Local Plan (refer to page 44 - Vision for the Central Area), so that it can be maintained and enhanced in the future. Located within Walthamstow, where the evening economy is designated of regional importance (refer par. 6.2 of the draft Local Plan), Ravenswood Industrial Estate fulfils some of the strategic assumptions of the Local Plan.	This point is noted. The plan makes specific reference to Walthamstow Village and Ravenswood Industrial Estate. However, the need to properly acknowledge the role and importance of these areas of the borough will be considered.
2950	Mr Tomasz Fiszer	WVRA Committee Member, Walthamstow Village Residents Association	Reference in draft Local Plan: 'Vision for the Central Area' (page 44) - The function of Walthamstow Village and Ravenswood Industrial Estate will be protected along with support for the growth of the evening economy. Our comment: The document does not define what is the function of Walthamstow Village and Ravenswood Industrial Estate, therefore it is impossible to tell what should actually be protected. Our proposed edit of	It is proposed to clarify the meaning of the statement referred to in paragraphs 6.10 and 6.11 of the Plan.

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			Par. 6.10 and addition of Par. 6.11 helps in making the statement in the 'Vision' meaningful. Suggested edit: The character of Walthamstow Village and the role it plays within the borough should be maintained and enhanced. The character and the business profile of Ravenswood Industrial Estate should be maintained and enhanced.	
2951	Mr Tomasz Fiszer	WVRA Committee Member, Walthamstow Village Residents Association	Reference in draft Local Plan: 'Area Profile' Par. 6.10 The area is also home to more local, cultural assets such as Walthamstow Village, Ravenswood Industrial Estate, the William Morris Gallery, Lloyd Park and Vestry House. The Feel Good Centre is also an important sporting facility in the borough. Our comment: Very diverse assets are listed in sequence with no differentiation between them (the public park next to the museum, next to the neighbourhood). It is extraordinary that there is no information on Walthamstow Village in this document. For the reasons explained above, this is not acceptable as Walthamstow Village area makes an important contribution to Walthamstow Town Centre. We note that other areas covered in Par.6 have been given descriptions.	The need to properly acknowledge the role and importance of these areas/places of the borough (Walthamstow Village) will be considered.
2952	Mr Tomasz Fiszer	WVRA Committee Member Walthamstow Village Residents Association	Suggested edit: Par. 6.10 Walthamstow Village is a neighbourhood centre with a vibrant and active community built on an unique well- preserved heritage. It 's high street and surrounding area are home to numerous social services and independent businesses, many of them representing the evening-economy and attracting users and visitors from Central Walthamstow, the borough and beyond. Par.6.11 Ravenswood Industrial Estate is home to number of independent businesses, with many of them representing the evening- and night-economy and some representing the creative industries. It is a vibrant place for the inhabitants of Waltham Forest and beyond to relax and be entertained. Par. 6.12 The wider area is also home to more local, cultural assets such as William Morris	These suggestions are noted for consideration.

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			Gallery, Lloyd Park and Vestry House. The Feel Good Centre is also an important sporting facility in the borough.	
2953	Mr Tomasz Fiszer	WVRA Committee Member, Walthamstow Village Residents Association	Diagrammatic map of Central Waltham Forest - no title (page 45) - Neighbourhood centres are indicated within Central Waltham Forest. Orford Road within Walthamstow Village is not indicated. Our comment: As explained in the comments above, Orford Road within Walthamstow Village should be considered a neighbourhood centre. Due to its very close location to the Walthamstow Central Station and social infrastructure serving the larger area, Walthamstow Village should be indicated within the approximate extent of the Walthamstow Town Centre.	Orford Road is currently designated as Local Retail Parade. The Council will consider the case for its reclassification as neighbourhood centre, in accordance with the policy criteria set out in Policy 47 and the emerging London Plan.
2954	Mr Tomasz Fiszer	WVRA Committee Member, Walthamstow Village Residents Association	Suggested edit: Please could you indicate Orford Road within Walthamstow Village on the map. Please could you slightly expand the dashed-line oval symbolising Walthamstow Town Centre Strategic location, to include Walthamstow Village. Reference in draft Local Plan: Policy 13 - Walthamstow Town Centre Strategic Location (page 47/48) Walthamstow Village is not mentioned. Our comment: For the reasons explained in the comments above, Walthamstow Village should be included in Walthamstow Town Centre Strategic Location. Suggested edit: Par. 13 Protects and enhances Orford Road and St Mary's Church Conservation Areas. [Note: This paragraph mirrors the paragraph relating to St James Street Conservation Area.]	These suggested changes are noted for consideration.
2997	Ira Dubinsky		I believe Higham Hill itself should be mentioned in the local plan as it is a well-recognised and significant neighbourhood in Walthamstow. I note that Higham Hill is not mentioned a single time in the entire plan.	This point is noted. It is proposed to make reference to all neighbourhood areas of the borough, including Higham Hill.
2998	Ira Dubinsky		I am concerned about the industrial, manufacturing and production uses in the Blackhorse Lane area. Whilst this is regionally significant and creates some employment, it also has	The draft plan includes policies to manage the impact of new development on existing neighbouring uses. For example, see policies 40, 59 and 64.

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			detrimental impacts on quality of life, namely the creation of noise and air pollution and a blight on the urban landscape. I have nothing against manufacturing or industrial uses of land, but I do feel that over the long-term we need to decide if it makes sense to have this type of activity in such close proximity to thriving residential areas. I personally would want to see industrial and manufacturing activity phased out of the area, with the exception of small-scale creative production such as Blackhorse Workshop or manufacturing activity with a clear local significance and opportunity for civic engagement such as Wildcard Brewery.	
2999	Ira Dubinsky		For Blackhorse Lane, recent transportation improvements have not been sufficient. Bus service performance and capacity routinely do not meet demand during peak periods. The other major issue in our area is lack of early years childcare spaces (nursery) and lack of accessible GP surgeries.	There will be a Transport Study commissioned to assess how local transport objectives will be met across the borough and this will look at the Higham Hill area. Under the Education Act of 1996 the borough must by law ensure that there are sufficient school places. Major developments coming forward in the plan period will be expected to contribute towards the provision of new GP surgeries as well as other critical infrastructure. The Local Plan will be supported by an Infrastructure Delivery Plan, which will set out details of the borough's infrastructure requirements. This document will set out what is needed, where it is needed and when it is needed. It will also set out the delivery mechanism to ensure the timely delivery of infrastructure. This document will be published with the final version of the plan. Policy 2(c) makes clear that planning permission will only be granted for new development if it can be demonstrated that there is, or will be, sufficient infrastructure capacity to support and meet growth requirements.
3000	Ms Georgina		It should also be noted that there is no reference to the Higham Hill area in the text of the document. There is also an existing community to the north of Billet Road, and a growing new	This point is noted for consideration - the need to make reference to all neighbourhood areas of the borough, including Highams Hill.

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	Chimarrides		residential community with new developments, such as Banbury Park, which sit on the fringes of the Higham Hill area. Billet Road forms a physical barrier to the rest of Higham Hill / Blackhorse Lane and it is important to consider how a more diverse retail and social offer on Billet Road, traffic calming measures and public realm improvements can better integrate this area. There are important community facilities in the area which need to be recognised in the document such as Higham Hill Community Cafe which provides an important social offer in particular for young families (storytelling, cooking classes, parent support groups) and the elderly (a living room away from home), and the Higham Hill Hub which offers learning and upskilling opportunities (e.g. bicycle training, planting programme with young people excluded from main stream schools).	
3001	Ms Georgina Chimarrides		There are key improvements needed to pedestrian and cycle links leading to the River Lee and Reservoirs to the north of Billet Road e.g. at the entrance point on Folly Lane. Other key green spaces which are not mentioned in the document include Cheney Row Park and the Folly Lane Community Woodland. There is an opportunity to create green links from the Wetlands entrance (Lockwood Way) to Higham Hill Park, to Lea Valley (from Folly Lane), to Cheney Row Park and onto Folly Lane Woodland.	This point is noted for consideration/inclusion in the plan document. The plan However, includes policies to improve cycling provision in the borough generally including permeability to Walthamstow Wetlands. Reference is also made throughout the plan document to the need to improve cycling and pedestrian networks in the borough.
3002	Ms Georgina Chimarrides		There is a key pedestrian and cycle link that needs to be delivered through the former Webbs Industrial Estate, which would connect Sutherland Road to Blackhorse Lane, and provide an important cut through to and from the station, and shorten journey times for those travelling on foot and by bike. The Local Plan should consider how to create attractive and active streets to encourage people to walk and cycle more e.g. From Higham Hill to Blackhorse Lane station there are	This point is noted for consideration/inclusion in the plan document

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			opportunities to improve areas with planting, way finding, public art, creative lighting etc. The routes are predominantly fairly dull and with poor street cleanliness.	
3003	Ms Georgina Chimarrides		The new Local Plan, once adopted, will replace the Blackhorse Lane Area Action Plan 2015. The Blackhorse Lane AAP is a much more detailed document for Blackhorse Lane and Higham Hill, which is not reflected in the draft Local Plan. It is not clear how the objectives and deliverables (that have not already been delivered) are safeguarded, and where this level of detail will now be incorporated. Can you please clarify? The Blackhorse Lane AAP provides a concise overview for the vision and objectives for this area, which aside from housing and employment, also include more detailed elements which are vital to creating a sustainable and vibrant local community such as safeguarding local retail parades, enhancing the retail and community offer, providing vital connections and infrastructure improvements, enhancing the public realm, investing in public spaces, and clearly identifies key local issues that need to be addressed.	This point is noted for consideration/inclusion in the plan document. The new plan seeks to include/carry forward existing policies and proposals considered still relevant and fit for purpose. It is proposed to address this point by the inclusion of an appendix to the plan setting out 'saved' policies.
3004	MR Tushar Kelkar		Much more emphasis on: 1) Cleanliness and image. The area right now suffers from waste, litter, excessive construction leading to noise/image pollution. There needs to be a renewed focus on lowering littering, pollution and improving the general tidiness of the area. More cleaners should be deployed at a higher frequency; more bins and pick ups should be provided. There should be more emphasis on ensuring that the image of the buildings along Blackhorse Lane are consistent with each other and make it obvious that the area is home to 'creatives' not just at the immediate junction on entering, but throughout the street.	The cleanliness of the streets is not a consideration for the Local Plan.

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3005	MR Tushar Kelkar		2) Local amenities. Much more allocation of resources to make the area one where you want to stay, rather than just live and then commute. There is very little infrastructure beyond transport links. Much more planning emphasis needs to be placed on sit-down restaurants (not takeaway shops), bars, cafes, a local pub, music venue, bakeries, hairdressers, boutique retailers recognising that all big brands are catered for in Tottenham Hale retail park or Walthamstow Mall / high street. No permission should be afforded to pawn shops, local newsagents, gambling institutions that discourage spending time within the area. Given the population growth expected, it is unreasonable to build the housing but not local amenities to support the wider regeneration area	The Plan is supportive of proposals that include but are not inclusive for diverse new retailing opportunities, bars cafes and restaurants that may come forward in the plan period.
3006	MR Tushar Kelkar		3) Safety. Given the growth of population, measures should be put in place to ensure that crime rates continue to fall and that the violence and drug abuse problems of nearby areas in London does not spill over into BHL. Better street lighting, more community watch programs, CCTV cameras run by the council. More resources should be allocated to prevent drug dealing across the area that invariable escalates to violence.	Please refer to Policy 65 (Designing Out Crime) for the Council's strategy on improving community safety and cohesion.
3007	MR Tushar Kelkar		4) Transportation. Given the growth and loss of parking space, it unreasonable to continue to reduce the parking space availability without massive investment in other modes of transport - cycle storage, bike lanes, more club cars, buses, and underground/Overground. Pressure should be placed on TfL to ensure that the Victoria line runs to Walthamstow more frequently.	The Transport Policies in the Plan are designed to encourage modal shift towards more sustainable forms of transportation. New development in the Borough where possible is car free to reduce the reliance on the personal car as the primary source of transportation. The Victoria Line runs a train service out of Walthamstow Central every 90 seconds. This the safe capacity that stations, current rolling stock, track and signalling can operate at.
3008	MR Tushar Kelkar		6) Recognition that the area should attract those who no longer can afford to live in Hackney - an active effort to pull artists and creatives into an affordable place to live should be made.	There are areas within the borough that have been identified as Creative Enterprise Zone. This will support the borough's Creative Economy.

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3009	Ms Alison Hill		The Town Hall Campus can be better used and the plans for that are reasonable, but I do not think the trees should be cut down - developers need to be more creative in planning, and I also think it is a terrible shame to lose the current fountain. I know it may be costly re maintenance, but it is very unique and of importance to those of us who like period pieces. The planned new fountain I know can be switched off and the area used to charge for pop up markets etc but how sad it is that everything comes down to money making opportunities instead of culture and heritage.	This point is noted. However, this is a site-specific proposal to be covered in the Site Allocations document.
3010	Ms Alison Hill		I think Wood St can probably take the new builds well and needs economic growth. There is potential there.	This point is noted.
3011	Ms Alison Hill		With regard to cycling etc I can't think there is any need for improving that except to ensure all new roads are made wide enough for wheelchair users (which I believe is not the case on several parts of the roads where cycle lanes have been built - mostly on Forest Road).	This point is noted.

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397	Mr Tomasz Fiszer	WVRA Committee Member, Walthamstow Village Residents Association	Walthamstow Village is home to social infrastructure and community facilities that support the local community and also provide for the community within the wider area of Walthamstow Town Centre. Our social infrastructure includes Vestry House Museum, Waltham Forest Community Hub, Walthamstow Toy Library, Walthamstow School for Girls, Waltham Forest Music Service for Children, St Mary's Welcome Centre, Addison Road GP Surgery, Comely Bank Surgery, faith	The draft Plan recognises the role of Walthamstow Village and its function within the wider Walthamstow area. See Chapter 6 relating to Central Waltham Forest.

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Policy: Central Waltham Forest				
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			facilities including St Mary's Church and Sakina Trust Mosque and four public houses, to just mention a few. Walthamstow Village is therefore crucial in providing services to the developing Central Waltham Forest area and especially for the Walthamstow Town Centre development (refer Policy 3: Location and Management of Growth in the draft Local Plan).	
1032	Mr Tim Brennan	Historic England	We note the overall objectives for the South and Central areas of the borough. We would welcome further clarity as to the 'place-making principles' to be adopted in these locations and how they will help achieve the intended growth in a manner that will complement the existing built environment.	The placemaking principles that will be adopted could take many forms - they could take the form of urban greening, installation of a public artwork or street furniture or other interventions to bolster the areas character. These will help achieve the intended growth in the area by driving a greater sense of cohesion and sense of place and individuality through a development to help set it out and make it distinct from other parts of borough. Any placemaking principles that are applied to an area will be harmonised and respectful to the existing character of the area.
1033	Mr Tim Brennan	Historic England	Clause J should be revised to ensure that it reflects the NPPF's emphasis on sustaining and enhancing the significance of heritage assets in the course of planning and managing future development.	Noted. Change to wording to read "Sustain and where appropriate enhance the significance of heritage assets".
1042	Mr Tim Brennan	Historic England	We recommend that clause 8 should be amended to read 'Preserve or where opportunities arise enhance the character and appearance of the Conservation Area'. This would reflect the wording of the Planning (Listed Building & Conservation Areas) Act 1990 and para 200 of the NPPF in relation to conservation areas.	Noted. Amend to read: 'Preserve or where opportunities arise enhance the character and appearance of the Conservation Area'. This is to reflect Planning (Listed Building & Conservation Areas) Act 1990 and para 200 of the NPPF in relation to conservation areas.
1064	Ms Alison Blom-Cooper	Planning Department Epping Forest District Council	Vision for the Central Area (page 44). It would be helpful to include a reference to the EFSAC recognising that it is then referred to in policies within this Chapter.	Noted. Include reference to EFSAC in the vision in the paragraph that mentions Forest Road and reference the green connection between EFSAC and Walthamstow Wetlands.

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1065	Ms Alison Blom-Cooper	Planning Department, Epping Forest District Council	Policy regarding Central Waltham Forest (page 46) Part K (there is no Policy number): see comments above in relation to new walking and cycling linkages and connections to the EFSAC.	Amend Policy numbering. The council is committed to reducing the impact of recreational pressures on the EFSAC through further dialogue with the conservators of Epping Forest, EFDC and other interested parties.
1086	Ms Alison Blom-Cooper	Planning Department, Epping Forest District Council	The Council also welcomes the qualitative improvements sought to provide business space, cultural and retail facilities in the borough, particularly in the Central Area. In addition the policies protecting the growing of food and allotments are welcomed as is the suite of policies in response to climate change.	Support welcomed.
1286	Josephine Vos	Transport for London - City Planning	This paragraph refers to the south of the borough in the section relating to the centre of the borough, possibly in error. However, we welcome the reference to gateway locations and the concept of a sense of arrival	Support welcomed. Alter text to read "Central" removing references to the South of the borough.
1539	Mark Furnish	Sport England	Sport England supports that all the overriding policies for the various sub-areas of the borough requires proposals to contribute to the sporting assets of an area. Having regard to the extent of growth in each area, and associated increase in demand for sport facilities, it is important that the sporting infrastructure is enhanced where required otherwise there would be unmitigated increased strain on facilities. New/enhanced facilities advocated in the Draft Local Plan, such as the enhancements advocated in Policy 8 to Low Hall Sports Ground, should address the key findings and reflect the actions of the emerging Playing Pitch Strategy. Sport England advises that these policies refer to this strategy, and any other sporting strategies, and express what is required to meet the emerging facility needs so that developers/applicants can be informed as to what sporting infrastructure is expected to support growth in the various areas.	Support welcomed. Reference the Sports Strategy and Playing Pitch Strategy in Policy 8 (Low Hall) so developers / applicants can be informed as to what sporting infrastructure is expected to support growth in the various areas.

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Policy 13: Walthamstow Town Centre Strategic Location				
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1044	Mr Tim Brennan	Historic England	We recommend that clause 6 be amended to read 'Preserve the listed buildings at the Town Hall campus and their settings'. This would reflect the wording in Part 1, Chapter 1, para 1 (3) of the Planning (Listed Building & Conservation Areas) Act 1990.	Amend Clause 6 to read "preserve the listed buildings at the Town Hall Campus and their settings". to reflect Part 1, Chapter 1, para 1 (3) of the Planning (Listed Building & Conservation Areas) Act 1990.
1113	Ms Patricia Braga		And - my reason for objecting so strongly - I wish to see the reinstatement of Selbourne Park and the retention of Walthamstow town centre's best feature (its lime tree avenue) to be the focus around which we build a green growing/ jobforall/inclusive and sustainable borough (please note all or nothing chopping down trees for a cycle way is not sound but inviting tourists to see our park/Green Market/diversity of spirit would be great for tourism). Hopefully Waltham Forest will become individual from anywhere else (so William Morris would not be turning in his grave).	The Mall / Selbourne Park planning application was determined under the 2012 LBWF Core Strategy. The draft plan contains a range of policies to guide new development in local areas. All these policies will be considered in decision making, ensuring that an appropriate balance is maintained between competing objectives - in this case delivering growth and ensuring that new development makes a positive contribution to the local environment by also providing protection to local distinctives features such as trees. The lime tree avenue is to be retained as part of the development.
1223	Rosie Sterry	Transport for London- Commercial Development	TfL CD strongly supports the aim to deliver "higher densities and taller buildings around Walthamstow Central transport hub, St James Street Overground Station and Walthamstow Queens Road Overground Station". TfL CD consider Walthamstow Central transport hub to have future development potential and we will work in partnership with the borough to shape intensification and development at this location.	Noted. Support welcomed.
1282	Josephine Vos	Transport for London - City Planning	We welcome references to improvements to the Walthamstow Transport Hub, including the bus station. We would welcome stronger recognition of the function the bus station plays, and the importance of protecting this as part of any redevelopment (although redevelopment can allow for reconfiguration and improvements as part of this).	It is proposed to review and strengthen the wording of the Policy (Point M) to bolster the importance of the Walthamstow Transport Hub.
1602	Bob Bennet		Priority 8: There has been very strong opposition to redevelopment of the Mall Shopping centre including, the proposed tower blocks over the centre and the loss of open	The improvement of Walthamstow Town Centre (classified in the London Plan as a Major Centre) remains a priority planning project for the Council. The Council recognises the challenges facing town centres at the present time and would review its

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Policy 13: Walthamstow Town Centre Strategic Location				
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			space. In the light of current retail trends is this still a realistic priority?	support for key projects/proposals as submitted by developers planning application.
1603	Bob Bennet		Priority 11: It is unclear as to what improvements to Walthamstow Market are envisaged, bearing in mind its continuing success and attraction to people from all over east London. It is a more successful market than many others in east London.	Improvements currently being considered to the market relate to its appearance, function and pedestrian circulation. Further details will be published and consulted on as part of regeneration proposals for Walthamstow Town Centre.
2165	anonymous response form 3		Note any council prepared to lose the trees (limes at Walthamstow Central are not trusted)	The draft Plan contains a range of policies to guide new development in local areas. All these policies will be considered in decision making, ensuring that an appropriate balance is maintained between competing objectives - in this case delivering growth and ensuring that new development makes a positive contribution to the local environment by also providing protection to local distinctive features such as trees.
2234	Capital and Regional Plc	Capital and Regional Plc	We strongly support draft Local Plan Policy 13, which addresses the Walthamstow Town Centre Strategic Location, including the proposed minimum growth targets of 3,150 new homes within the area, in addition to the provision of higher densities and taller buildings around Walthamstow Central transport hub, St James Street Overground Station and Walthamstow Queens Road Overground Station. In particular, we endorse LBWF prioritising the mixed-use development of The Mall shopping centre, the provision of new housing units, an improved town square, and improvements to Walthamstow Central Station, as set out in Part 8 of the draft policy.	Support welcomed.
2289	S Bell		How would you characterise the key challenges which face this area? The redesign of the bus station and the removal of green space.	Noted. The key challenges that affect the area are a hybrid of spatial, economic and social challenges. It is proposed to further clarify this point in the document.
2537	Ms Laura Gilbert		Policy 13 M - why do you say 'in particular Walthamstow Central & St James St', when the section on Blackhorse Lane states that a	Policy 13 Walthamstow Town Centre Strategic Location refers to the area of Walthamstow Town Centre and St James Street, while Policy 15 Blackhorse Lane Strategic Location refers to the

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Policy 13: Walthamstow Town Centre Strategic Location				
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			greater sense of arrival is needed. Please don't let Blackhorse Rd station be the poor relation.	area of Blackhorse Lane. Therefore, all of the development principles relate specifically to their areas. We have proposed development principles for improvements to a sense of arrival at Walthamstow Central and St James Street as they are both heavily used stations with connections to Central London and Chingford. We want to ensure that any future development to Waltham Central, St James Street and Blackhorse Road station will improve the first impression and experience for commuters and visitors when they arrive to the station and visit the borough.

Policy 14: Forest Road Corridor Strategic Location				
ID	Full Name	Organisation	Comment	Council (Officers) Response
975	The City of London	The Conservator's of Epping Forest	Commits development to deliver improvements to public spaces across the area. As indicated for proposed developments in South Waltham Forest, the City Corporation supports moves that encourage a modal shift towards walking, cycling and the growing Personal Electric Transport (PET) sector and welcomes a commitment to improving public open spaces. Careful discussion is required between borough and City Corporation officers, alongside good and meaningful public consultation, to design and manage the impact of the proposed improvements to public open spaces. The Epping Forest SAC Mitigation Strategy (EFSACMS) and an associated Governance mechanism provides an ideal vehicle for ensuring that SAC protection and improvement; LPA growth aspirations and public acceptance of change are realistically matched and properly funded.	Support for transport modal shift in the borough welcomed. LBWF is committed to working with The City of London Conservators of Epping Forest to ensure SAC protection and improvements so future generations of visitors and residents can continue to enjoy Epping Forest.

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Policy 14: Forest Road Corridor Strategic Location				
ID	Full Name	Organisation	Comment	Council (Officers) Response
1604	Bob Bennet		Priority 2: It should be made clear that the important listing buildings on the site will be retained and their setting enhanced by any additional development on the site.	The Listed buildings on the Town Hall Campus are protected and form an integral part of the Town Hall Campus transformation project and will be extensively refurbished. It is proposed to clarify this point in the document.

Policy 15: Blackhorse Lane Strategic Location				
ID	Full Name	Organisation	Comment	Council (Officers) Response
918	Mr Mathew Frith		Parts 9 and 10: We welcome and support these.	Support welcomed.
1149	Blackrock and NEAT Development		Paragraphs 6.1-6.10 set out the profile of the sub-area which we are broadly supportive of, specifically the recognition of Blackhorse Lane designation as a Creative Enterprise Zone (CEZ) and that it forms part of the GLA's Housing Zone (Paragraph 6.3).	Support welcomed.
1156	Blackrock and NEAT Development		We are broadly supportive of Policy 15 which sets out the development priorities for Blackhorse Lane over the Plan period.	Support welcomed.
1157	Blackrock and NEAT Development		It is noted (part 1.) that LBWF is seeking to deliver a minimum of 1,650 new homes, in our view whilst it is positive that the Council is seeking to deliver new homes in the area this minimum target could be even more ambitious in order to capitalise on the area's highly accessible location (i.e. links to public transport and the strategic road network), the presence of emerging local creative/cultural industries and availability of significant quantities of underutilised brownfield employment land (namely within the Blackhorse Lane Strategic Industrial Location (SIL)).	Noted. Support welcomed. Housing and employment targets are subject to evidence-based assessments and will be updated if this is found to be necessary in for the next version of the plan.

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Policy 15: Blackhorse Lane Strategic Location				
ID	Full Name	Organisation	Comment	Council (Officers) Response
1158	Blackrock and NEAT Development		We note from LBWF's latest Employment Land Study (ELS) (2019) (Paragraph 4.37) that the Blackhorse Lane area is identified as having capacity for an additional 2,098 new homes based on currently identified potential sites, as such we would suggest the Council considers increasing its new homes target for Blackhorse Lane to reflect the findings of the latest ELS as a minimum.	Housing and employment targets are subject to evidence-based assessments and will be reviewed and updated if this is found to be necessary in for the next version of the plan.
1159	Blackrock and NEAT Development		We welcome the policy's confirmation (part 2.) that the area is a Creative Enterprise Zone as designated under the new London Plan.	Noted. Support welcomed.
1160	Blackrock and NEAT Development		Generally support the principle of intensifying floorspace in the existing employment areas of Blackhorse Lane (part 3.), albeit we make a suggested amendment to wording of the policy to emphasise this (see below). 3. Intensification of floorspace in the existing employment floorspace areas.	Noted. Support welcomed. Amend to read the following: 3. Intensification of floorspace in the existing employment floorspace areas.
1161	Blackrock and NEAT Development		We also support part 4 of the policy which seeks to promote and protect existing creative workspace. However, in our view this could be more specific to include key Use Classes 2 associated with such spaces i.e. Use Classes B1 (a), B1(b), B1 (c) and B2, and recognise the viability considerations associated with providing affordable workspace in line with draft Policy E3 of the London Plan and the requirements of the NPPF. Our suggested wording is included below. 4. Develops, enhances, protects and manage new and existing creative workspace (primarily within either/or a mix of, Use Classes B1(a), B1(b), B1(c) and B2), providing flexibility for changing business needs, and an attractive business environment including related ancillary facilities, including, where viable, providing affordable workspace.	Support welcomed. The comments made are noted and will be reviewed to ensure general conformity with the London Plan and the Local Plan evidence base on Employment Land and Cultural Infrastructure.

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Policy 15: Blackhorse Lane Strategic Location				
ID	Full Name	Organisation	Comment	Council (Officers) Response
1162	Blackrock and NEAT Development		We wish to offer strong support to part (5) of Policy 15 and welcome the Council's support for the high density - employment led redevelopment of the 'Uplands Business Park area' of the Blackhorse Lane SIL. As LBWF are aware, our clients (Blackrock /NEAT Developments) have significant land holdings within the Blackhorse Lane SIL including the Uplands Business Park and Forest Trading Estate. Accordingly, we request that the Policy is amended to define what is meant by the 'Uplands Business Park area' either within revised wording or in plan format.	Noted. Support welcomed.
1163	Blackrock and NEAT Development		Our suggested wording below has also sought to enable the inclusion of the process of co-location to ensure consistency with the findings of the ELS (2019), which identifies (pp.33) the site's (as part of the Blackhorse Lane SIL) suitability for intensification and colocation (to follow on). 5. Redevelopment of existing employment land at the Uplands Business Park and Forest Trading Estate area to create a new sustainable neighbourhood, providing high density (including scope for tall buildings) employment-led mixed use development and co-location with Light Industrial/Manufacturing/Production space (Use Classes B1(c) and B2), workspace including, but not limited to office, studios and co-working space (Use Classes B1(a) and B1(b)) and appropriate cultural uses (Use Classes D1, D2 and limited flexible A1/A3/A4) ; alongside new quality homes (Use Class C3).	Noted. This is subject to review and will be considered for the next draft of the plan.
1164	Blackrock and NEAT Development		As with Part 4 we also consider that the policy should specify the range of use classes sought as part of intensifying and redevelopment the site for a mix of employment and non-employment uses and which reflect the Council's emerging Economic Strategy. In a similar vein we also request that the policy further defines what is meant by 'Workspace' to ensure	Comment noted. The policy will be updated to reflect the requirements set out in the Council's Employment Land Study.

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Policy 15: Blackhorse Lane Strategic Location				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			the latest trends in workspace typologies are captured such as studio, coworking and other flexible workspace solutions	
1165	Blackrock and NEAT Development		We are also broadly supportive of Parts 6-8 of the policy and particularly welcome the Policy's emphasis on encouraging the temporary use of vacant buildings for creative workspaces and activities, although we would welcome LBWF providing further details on what such 'activities' might comprise, particularly in designated employment areas where the current policy emphasis (in the NPPF and new London Plan) is on encouraging employment uses.	Support welcome. It is proposed to amend this policy to describe what the activities might comprise.
1166	Blackrock and NEAT Development		With regard to Part 9 of the Policy, whilst we are broadly supportive of encouraging place making principles based on local character and distinctiveness, in our view the policy should go further and identify the key distinctive features within it e.g. the area's industrial history and emerging creative and cultural hub where people live and work.	Support welcomed. With regard to part 9 of the policy, it is proposed to mention the shop mannequins and leather goods and glassworks and paintworks - subject to further historical research into the area.
1167	Blackrock and NEAT Development		We are generally supportive of both Parts 10 and 11 of Policy 15 in terms of improving walking and cycling accessibility and infrastructure in the area as well as the area's public realm. However, we request that further detail is provided in Part 10 in order to properly define what is meant by 'other defined routes' it is unclear at this stage of the plan what such routes would comprise and therefore it is questionable whether such wording can justifiably be included in the policy.	Support welcome. Review and define 'other defined routes' or remove from the policy.
1168	Blackrock and NEAT Development		Our suggested amendments to the wording of Policy 15 is set out below. "Policy 15 Blackhorse Lane Strategic Location Development in the Blackhorse Lane Strategic Location over the Plan period will deliver the following priorities: 1. Achievement of minimum growth targets of 1,650 2,100 new homes; 2. Designates the area as a Creative Enterprise Zone in line with Draft London Policy HC5; 3. Intensification of floorspace in the	The suggested wording changes will be carefully considered in preparing the next version of the plan.

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Policy 15: Blackhorse Lane Strategic Location				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			<p>existing employment floorspace areas; 4. Develops, enhances, protects and manage new and existing creative workspace (primarily within either/or a mix of, Use Classes B1(a), B1(b), B1(c) and B2), providing flexibility for changing business needs, and an attractive business environment including related ancillary facilities, including, where viable , providing affordable workspace; 5. Redevelopment of existing employment land at the Uplands Business Park and Forest Trading Estate area to create a new sustainable neighbourhood, providing high density (including scope for tall buildings) employment-led mixed use development and co-location with Light Industrial/ Manufacturing/Production space (Use Classes B1(c) and B2) , workspace including, but not limited to office, studios and co-working space (Use Classes B1(a) and B1(b)) and appropriate cultural uses (Use Classes D1, D2 and limited flexible A1/A3/A4); alongside new quality homes (Use Class C3); 6. Improvement and enhancement of visitor and cultural attractions of Blackhorse Lane area including Walthamstow Wetlands, Blackhorse Workshop and Gnome House and supports the development of new cultural venues with the area; 7. Encourages the temporary use of vacant buildings (including heritage assets) and sites for creative workspace and activities [we request this is defined further]; 8. Retention of the Blackhorse Neighbourhood Centre boundary; 9. Place-making principles based on the character and local distinctiveness of Blackhorse Lane including its industrial legacy and emergence as a mix of creative and cultural enterprise where people live and work as well as, including its heritage, cultural and green assets; 10. Improves public realm and public spaces across the area and walking and cycling accessibility, connectivity, permeability and legibility to Lee Valley Regional Park, Walthamstow Wetlands, Town Hall Campus and St James,</p>	

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Policy 15: Blackhorse Lane Strategic Location				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			as well as other identified routes [we request these are defined]; 11. Improves the sense of arrival Blackhorse Lane, as a gateway into the borough, particularly at junction of Forest Road/Blackhorse Lane.”	
1220	Rosie Sterry	Transport for London - Commercial Development	The aim to strengthen Blackhorse Lane as a Creative Enterprise Zone and a mixed use liveable and vibrant neighbourhood comprising of new quality homes, employment, retail and social and community infrastructure is supported.	Noted. Support welcomed.
1414	Blackrock and NEAT Development		We are particularly encouraged by identification of Blackhorse Lane as such a strategic location, and the accompanying policy's proactive approach to encouraging intensification of employment uses and colocation of non-residential uses within the Blackhorse Lane SIL, namely Uplands Business Park. However, we urge the Council to further consider the area's potential for intensification of residential uses given the high accessibility of the area, availability of existing underutilised brownfield employment land in addition to the area's designation as a Creative Enterprise Zone.	Noted. Support welcomed. The council will review its position regarding the intensification of the Blackhorse Lane Area and will publish any update on this in the next draft of the plan.
1605	Bob Bennet		It is noted it is proposed to intensify the use of the existing floor space and also promote the re-development of the Uplands Business Park. However, there is a risk this will displace many of the existing occupiers of the existing low rent industrial units who currently provide valuable services for local people and businesses.	This point is noted. To manage this risk, policies 15 and 41 of the draft Plan seeks to secure the provision of low-cost and affordable workspace within the borough to support the growing need for cheaper and low-cost space to support start-ups, SMEs and creative and digital industries.
1634	Oliver Milne	Savills (UK) Ltd	Within the consultation document we note that the Council is proposing to retain the site within the Sutherland Road BEA. This is completely at odds with the extant planning permission at the site and Swan's emerging development which will see a residential-led, mixed-use scheme come forward in the near future. If the site is retained within the BEA within the new Local Plan there will be a policy conflict between the	Noted. The Planning Permission on the Sutherland Road site was decided under the premise of the adopted 2012 Core Strategy.

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Policy 15: Blackhorse Lane Strategic Location				
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			development and the overriding objective of draft Policy 38 (which looks to safeguard employment land).	
1635	Oliver Milne	Savills (UK) Ltd	The retention of the site with the Sutherland Road BEA is also at odds with the proposed approach for some of the surrounding sites. We note that the Council is proposing to omit the Unity Works site, the Headbourne House site and the Atelier Place site from the Sutherland Road BEA. We presume that this is because these historic employment sites have recently been re-developed to provide residential-led, mixed-use schemes, however, this is not clear from the consultation document. The differing approaches proposed by the Council is considered unsound and unjustified.	Noted. The Site Allocations document will be produced as a separate piece of work and there will be the opportunity to comment on site specific issues in the public engagement events and public consultations that will ensue.
1636	Oliver Milne	Savills (UK) Ltd	Given the above, it is respectfully requested that the Sutherland Road BEA be amended to exclude the Cordage Works site. This will ensure that there are no policy conflicts within the new Local Plan in the future and follows the same approach as the Unity Works site, the Headbourne House site and the Atelier Place site.	Noted. The Council will review this statement and make any further amendments in the next draft of the Local Plan.
1828	The Delta Group	The Delta Group	Should the Council not undertake the approach of preparing a masterplan in conjunction with the Local Plan, the Plan is not considered to be 'justified' or 'effective' as set out in the NPPF soundness tests as: There is no evidence provided in the Local Plan to demonstrate that co-location and the residential units numbers, mentioned in draft Policy 15, can be accommodated in the Blackhorse Lane SIL; and The draft Local Plan does not provide commitment on timescales for the preparation of a masterplan to cover the SIL boundary. Therefore, until this is completed any planning application for co-location could not be supported by the LPA or GLA.	Noted. The Council is currently developing its policy on co-location to reflect the policy requirements of the emerging London Plan. A programme for the preparation and delivery of the masterplans is currently being considered. The Council is preparing an additional Local Plan document on site specific allocations. This new document will provide opportunity to apply the policies of the plan on specific sites, providing more details on how development would be managed on specific sites.

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Policy 15: Blackhorse Lane Strategic Location				
ID	Full Name	Organisation	Comment	Council (Officers) Response
2290	S Bell		How would you characterise the key challenges which face this area? It has been turned into a concrete jungle with no infrastructure e.g. health facilities.	Noted. The key challenges that affect the area are a hybrid of spatial, economic and social challenges. The infrastructure that will be provided in the Plan period will be determined by the Infrastructure Delivery Plan which will feed into the next publication and consultation of the Local Plan.
2538	Ms Laura Gilbert		Re Blackhorse Lane: Agree that sense of arrival at Blackhorse Lane area needs improvement & that more cafes /food outlets needed - currently hardly any, which lets the area down.	This comment is noted in preparing the Proposed Submission of the Local Plan.
2544	Mrs Irena souroup		I have particular concerns about 2 things: The failure of the document to specify which areas of land are PROTECTED and will NOT be built on. The plan needs to spell out, I believe, which area will definitely NOT be built on. For example: The Douglas Eyre playing fields are a magical open space that look like a 'sitting duck' in the face of the towers at Blackhorse Road. These fields have been threatened with development in the past (new Willowfield school) and I am concerned it will happen again. As a resident of 13 years, it is clear these playing fields are really, in terms of wildlife, part of the Wetlands set-up and provide grazing for geese etc. They are well used but could be even better exploited for leisure and activities for young and old alike. These playing fields, or any part of them, need specific protection.	This comment is noted. The next iteration of the Local Plan will be supported by Playing Pitch Strategy, which sets the parameters for the protection and enhancement of playing fields.

Policy 16 Wood Street Strategic Location				
ID	Full Name	Organisation	Comment	Council (Officers) Response
639	Gordon Turpin	Highams Park Planning Group	Appreciate the need for new housing, although the plan for intensification is at odds with vision for the district which is to increase vibrancy. Highams Park.	Noted. The housing numbers that have been calculated for the Plan and approved by the Council, are a direct response to the Objectively Assessed Housing Need (OAHN), which was identified in the Strategic Housing Market Assessment (SHMA).

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Policy 16 Wood Street Strategic Location				
ID	Full Name	Organisation	Comment	Council (Officers) Response
				The number of dwellings that the council is planning for is a direct response to the housing affordability and supply challenges that exist in the borough. The intensification of housing in areas is a result of meeting our objectively assessed need on the sites that are available. The increased vibrancy will stem from the incremental growth of the borough throughout the plan period.
919	Mr Mathew Frith		Parts 6 and 7: We welcome and support these.	Noted. Support welcomed.
976	The City of London	The Conservator's of Epping Forest	Policy 16.6 (page 51) commits development to deliver improvements to public spaces across the area. As indicated for proposed developments in South Waltham Forest, the City Corporation supports moves that encourage a modal shift towards walking, cycling and the growing Personal Electric Transport (PET) sector and welcomes a commitment to improving public open spaces. Careful discussion is required between borough and City Corporation officers, alongside good and meaningful public consultation, to design and manage the impact of the proposed improvements to public open spaces. The Epping Forest SAC Mitigation Strategy (EFSACMS) and an associated Governance mechanism provides an ideal vehicle for ensuring that SAC protection and improvement; LPA growth aspirations and public acceptance of change are realistically matched and properly funded.	Noted. Support for transport modal shift in the borough welcomed. LBWF is committed to working with the City of London Conservators of Epping Forest to ensure SAC protection and improvements so future generations of visitors and residents can continue to enjoy Epping Forest.
1231	Rosie Sterry	Transport for London - Commercial Development	We also support "mixed use development involving improvements to The Mall shopping centre, provision of new housing units, improved town square and improvements to Walthamstow Central Station" and "Improvements to the Walthamstow transport hub, including, but not exclusively the bus station". The policy should reference the opportunity for redevelopment of Walthamstow Central transport hub to make	Noted. Support welcome. Amend to reference the development opportunity at Walthamstow Central Transport Hub.

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Policy 16 Wood Street Strategic Location				
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			more efficient use of a highly sustainable location, which can include provision of residential uses. TfL CD considers this site to have capacity for significant redevelopment in the future and, given its highly sustainable location, think it is important that the Local Plan fully recognises this. Redevelopment of the site would also align with proposal 97 of the Mayor's Transport Strategy and Paragraph 122 of the NPPF, which seek to ensure efficient use of land (particularly to enable housing delivery) through maximising development potential.	
1232	Rosie Sterry	Transport for London - Commercial Development	In part 6 of this policy it references Chingford Station, Chingford Station is within the north of the borough, reference to this station should be removed from this policy.	Noted. Remove reference to step-free access at Chingford Station from this policy. (The station is step-free anyway.)
1606	Bob Bennet		Priority 2: As stated above there is a risk that existing businesses will be displaced as a result of increased rents in new buildings	This point is noted. To manage this risk, policies 15 and 41 of the draft Plan seeks to secure the provision of low cost and affordable workspace within the borough to support the growing need for cheaper and low-cost space to support start-ups, SMEs and creative and digital industries.
1607	Bob Bennet		Priority 6: Presumably this section is in the wrong place within the document?	Noted. We will move Priority 6 in the next draft of the Plan.
1904			DLP Policy 16 (Wood Street Strategic Location) p.51 While we support the Wood Street Strategic Location designation (which retains the existing district centre boundary) based on the accessibility to transport infrastructure and other services, we consider the minimum growth target of 550 new homes within the area to be wholly insufficient, given the number of strategic sites identified in the Wood Street AAP and the previous target of 1,000 new homes that was identified in this document. The minimum housing target for the area should therefore be significantly increased to encourage the effective use of land and intensification of development (and mix of land uses)	Noted. Support welcomed. Further work on the growth targets is ongoing. We will publish any update in the next consultation of the Local Plan.

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			where appropriate, with the aim of achieving the ambitious housing targets of the borough and providing a greater resident population in-keeping with the growing economy of the area. For clarity, the policy should make specific reference to the sites in the strategic area which have been identified to deliver housing.	
2147	anonymous response form 1		Wood Street is dying because the four car parks are down to one, as the other one is a car park for the health centre	This point is noted. However, the issues affecting the vitality and viability of the borough's town centres are complex and not necessarily arising from the lack of parking provision. This includes the economic downturn, the growth in internet shopping, changed shopping habits and the continued influence of out-of-centre shopping. The Council is addressing these challenges locally in a number of ways e.g through the preparation of town centre strategies and other regeneration initiatives for the designated centres.
2288	S Bell		How would you characterise the key challenges which face this area? The lack of provision of shops that people actually want to use. The begging, homelessness and criminality that is/never hard to find. the proposed to transfer the library to a smaller building with less bus accessibility	The key challenges that affect the area are a hybrid of spatial, economic and social challenges. The retail provision in the Wood Street Area are set to be preserved and enhanced in the plan period.
2993			Part 2 of the Policy seeks the intensification of existing employment floorspace. This wording is overly restrictive and doesn't acknowledge the site-specific challenges which may exist, including viability matters, especially those of non-designated employment sites. Mixed use development opportunities should be promoted within this Policy to optimise the potential of sites to delivery multiple land uses.	The Council is preparing a Site Allocation document to support the policies of the plan. This will test delivery issues on identified sites and further clarify the approach to the applied. The Plan seeks to promote mixed use development on all sites. See Policy 5.
2994			We note the map on Page 27 in the DLP which outlines the locations of the Strategic Areas across the borough. Policy 16 should be supported by a more closely scaled map to clearly show which land is covered by the strategic location designation. Taking the above into account, we consider it	The Plan will be supported by a Policies Map showing the areas identified as Strategic Locations.

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			prudent, when plan-making and decision-taking for development proposals within Strategic Locations throughout LBWF, that increased flexibility and promotion be afforded to matters such as: increased residential densities and housing targets; increased building heights; and land uses in mixed use developments.	
2995			We consider it imperative for the DLP to crystallise opportunities which would optimise increased residential densities, increased heights and land uses in mixed use developments in key regeneration areas / strategic locations from the outset, subject to high quality designs of outstanding architectural merit coming forward. These strategic sites can generally provide higher levels of public infrastructure and community services which therefore represent key areas where the upgrade and expansion of such infrastructure and services should be focused to support the necessary housing growth and resident populations within these strategic areas.	The Council is preparing a Site Allocation document. This will provide opportunity to apply the policies of the plan on specific sites, also providing greater detail on heights, densities and the mix of uses likely to be acceptable.

Chapter 7: North Waltham Forest				
ID	Full Name	Organisation	Comment	Council (Officers) Response
3	Mr Will Orlik		I can only relate to the South Chingford area really. The transport links are the worst in London. The journey to Stratford City from South Chingford takes an hour by bus and not that much different by LUL/Overground. The 'Hall Farm Curve' should be reinstated. An opportunity missed at the time of the Olympics. The bus services (357, 97, W16, 158) are the worst in London in my opinion. There are already too many people and no decent transport links. Overpopulating won't improve the area.	The issues regarding frequency of buses and the need for better bus connections is noted. The Council will continue to work in partnership with TfL in developing appropriate sustainable transport policies that will assist in improving Waltham Forest's bus and rail network

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ID	Full Name	Organisation	Comment	Council (Officers) Response
4	Scaife		The vision is not clear. South Chingford/Chingford Mount is poorly served by transport. It is in desperate need of a Tube or train/Overground station. People have been out priced from Walthamstow and have migrated to South Chingford but with no improvements to transport. The minute you introduce decent transport links you will change the landscape of South Chingford.	The issues regarding transport are noted. The Council will continue to work in partnership with TfL in developing appropriate sustainable transport policies that will assist in improving Waltham Forest's bus and rail network
5	Mrs Caroline Murray		I agree with most of the vision.	This comment is noted.
6	Mrs Andrea Boyle		My first concern is that this has been launched as a consultation whilst the majority have taken holiday following the school summer break up.	Consultation began on 22 July 2019 and ended on 30 September in order to account for the school summer holidays.
18	Mr Dominic Eaves		Generally supportive of any attempts to create renewal, particularly in the Chingford Mount area, which has the potential to be improved dramatically with upgrade of low quality retail spaces. One of the most prominent plots is fire damaged / derelict for some time, and intervention should occur to remedy this ASAP, as it is acting to discourage businesses to come to the area.	The Local Plan is informed by an up to date assessment of retail need in the Waltham Forest Retail and Town Centres Study 2019. Policies 48, 49, 50 and 51 set out how the Council intends to promote the regeneration of retail in the Borough's district centres.
32	Alison Brand		I am writing to voice my deep concern and distress after reading the proposed changes for North Chingford.	The specific point of objection to proposed changes to North Chingford is not mentioned. The draft Local Plan contains a range of policies to guide growth and change where development opportunities exist. In meeting growth requirements, the plan also seeks to ensure that new development is carried out in harmony with its setting and makes a positive contribution to the local environment.
37	David Mears		Can you confirm the eventual closure of the car-park behind Boots (Station Road) and eventual closure if the car park behind the Assembly Hall	The Local Plan does not contain any site allocations and does not specifically refer to these sites.

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ID	Full Name	Organisation	Comment	Council (Officers) Response
38	David Mears		Station Road - in order to build more flats in North Chingford and that only Brownfield Sites will be built on and that the Green Belt around Chingford will not be built on.	The Draft Local Plan does not state that more flats will be built in North Chingford. The plan seeks to protect the Green Belt. The concern raised about the impact of growth on local character is recognised - in particular that new development could become inappropriate to the existing local context. However, if well managed, growth could provide positive benefits to improve the quality of local environments. The draft Local Plan contains a range of policies to guide growth and transformation of local areas to ensure that new development is carried out in harmony with its setting and makes a positive contribution to the local environment.
43	Stephen Hudson		What is happening to 60 Station Road?	There are no site allocations in the Draft Local Plan relating to this property. This site is being developed following the granting of planning permission.
44	Stephen Hudson		What is the plan for Assembly Hall?	The Draft Local Plan does not contain site allocations. A Site Allocations Development Plan Document is being prepared for public consultation later this year.
45	Stephen Hudson		What is happening to the Railway Station and Bus Station?	The Draft Local Plan does not contain site allocations. A Site Allocations Development Plan Document is being prepared for public consultation later this year.
46	Stephen Hudson		What is happening to the demolished building next to Barclays Bank?	The Draft Local Plan does not contain site allocations. A Site Allocations Development Plan Document is being prepared for public consultation later this year.
47	Daf Bergin		No idea what these plans mean for North Chingford	North Chingford is identified in the Local Plan as a Strategic Location. Policy 18 of the Local Plan sets out the Council's priorities for delivering a minimum of 300 homes in the area over the lifetime of the plan in addition to applying a flexible approach to retail in Station Road and encouraging the use of the centre to provide greater employment, creative, leisure and cultural opportunities.

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48	Marie Kerrigan		Any transport developments?	Chapter 15 deals with sustainable transport and infrastructure.
49	Marie Kerrigan		Hall Lane re-opening?	It is not clear which particular site this comment relates to. The Draft Local Plan does not contain site allocations. A Site Allocations Development Plan Document is being prepared for public consultation later this year
50	Marie Kerrigan		Any infrastructure being planned?	The Local Plan will be supported by an up to date Infrastructure Delivery Plan in line with the requirements of the NPPF (2019) and the Intent to Publish London Plan 2019. This document provides a framework for how the requisite infrastructure will be funded and located in order to deliver the growth required in the Local Plan
51	Marie Kerrigan		It all seems a bit fait accompli- what will any objectives do how much will it cost? who wins?	There are further Local Plan consultations planned in 2020 and there are a number of opportunities for residents to contribute to the plan-making process.
52	Christine Guy		There are many questions that need answering as there are concerns about the proposals for the future of this area of Chingford. There are fears that there are plans to demolish the Assembly Hall. Is this a fact?	There are no site allocations in the Plan as these will be the subject of separate consultation during 2020.
53	Margaret Carvell		Very concerned at the plans for 4,000 units of housing with no mention of the increase in services that will be required.	The Local Plan will be supported by an up to date Infrastructure Delivery Plan in line with the requirements of the NPPF (2019) and the Intent to Publish London Plan 2019. This document provides a framework for how the requisite infrastructure will be funded and located in order to deliver the growth required in the Local Plan.
54	Margaret Carvell		We are not impressed with the plans of North Chingford. We do not require any high-rise building.	The concern about tall buildings is noted. The draft Local Plan contains a range of policies to guide growth and change and to ensure that new development is carried out in harmony with its setting and makes a positive contribution to the local environment. See Policy 5 (Approach to Intensification and Policy 62 (High Quality Design) and Policy 63 (Tall Buildings).

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				Other policies also consider amenity and other issues relating to local character. All of these policies are considered in decision making, ensuring that an appropriate balance is maintained between competing objectives and that new development is sensitively designed.
55	Margaret Carvell		North Chingford is a village community and this should be safeguarded.	This comment is noted. The Plan is intended to support mixed and balanced communities and to protect and enhance the character of the borough.
58	Mr. David Matson		Town Centre and Retail (Policy 19, section 5): A retail policy for North Chingford seems well developed. However, the basis for this policy is unknown to residents. Changes to retail policy are potentially radical, including “establishment of “a primary shopping area”, and “the de-designation of the existing secondary frontage”. LBWF undertook a Waltham Forest Retail & Town Centres Study in 2019, which underlies its overall town centres and retail policy (para. 11.2). I understand from the drop-in session that the study will be available before the end of the consultation period. I contend that consultation without the early release of the town centre and retail study is incomplete, and invalid. Without this background information, policy is merely assertion, with radical implications, and not the outcome of coherent argument. Please release the town centres and retail study as soon as possible - to enable fuller comment.	The comment is noted, and the Town Centres and Retail Study 2019 is now online at https://walthamforest.gov.uk/sites/default/files/TCR%20Study%202019%20FINALv3.1%20%281%29%20-%20LR.pdf
59	Mark Slade		North Chingford: Retaining the character of the area and ensuring the Green Belt area of Epping Forest is protected and enhanced. Attracting business.	The Strategic Location Policy for North Chingford aims to build on the character of the area and aims to enhance and support it. The Design and Heritage policies in the Local Plan also have a strong focus on enhancing and retaining character as does Chapter 17 - Protecting and Enhancing the Environment.
62	Mark Slade		It is important that the character of North Chingford is preserved and Epping Forest is protected	The Strategic Location Policy for North Chingford aims to build on the character of the area and aims to enhance and support it. The Design and Heritage policies in the Local Plan also have a

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				strong focus on enhancing and retaining character as does Chapter 17 - Protecting and Enhancing the Environment.
65	Rachel Thomas		North Chingford: Maintaining the "Village" character.	The Strategic Location Policy for North Chingford aims to build on the character of the area and aims to enhance and support it. The Design and Heritage policies in the Local Plan also have a strong focus on enhancing and retaining character.
66	Rachel Thomas		North Chingford: Investing in the high street, i.e parking fee for 30 minutes not 15 minutes.	Noted. However, this is an operational matter outside the scope of planning policy but directly related to other work on the preparation of Town Centre Strategies or other Regeneration work.
67	Rachel Thomas		North Chingford: Supporting small retail shops- reduce business rates.	Noted. However, this is an operational matter outside the scope of planning policy but directly related to other work on the preparation of Town Centre Strategies or other Regeneration work.
68	Rachel Thomas		Retaining the library and assembly hall- not over-modernizing.	There are no site allocations in the Plan as these will be the subject of detailed site-specific proposals to be brought forward through a Site Allocations document.
69	Rachel Thomas		North Chingford: Increasing parking time to encourage people to use the high-street shops, reduce/subsidize business rates.	Noted. However, these are operational matters outside the scope of planning policy but directly related to other work on the preparation of Town Centre Strategies or other Regeneration work.
70	Sally Slade		Maintain the heritage and community of the area.	The Strategic Location Policy for North Chingford aims to build on the character of the area and aims to enhance and support it. The Design and Heritage policies in the Local Plan also have a strong focus on enhancing and retaining character.
71	Sally Slade		Improve facilities in the vicinity.	The Local Plan will be supported by an Infrastructure Delivery Plan, which will set out details of the borough's infrastructure requirements. This document will set out what is needed, where it is needed and when it is needed. It will also set out the delivery mechanism to ensure the timely delivery of

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				infrastructure. This document will be published with the final version of the plan.
72	Sally Slade		Ensure any development is supported by improvements in infrastructure e.g. doctors, schools, transport.	The Local Plan will be supported by an up to date Infrastructure Delivery Plan in line with the requirements of the NPPF (2019) and the Intent to Publish London Plan 2019. This document provides a framework for how the requisite infrastructure will be funded and located in order to deliver the growth required in the Local Plan.
79	Andrew Sivyler		Declining shopping centre.	Policy 18 (North Chingford) and policies 48-50 propose measures to address High Street retail decline.
80	Andrew Sivyler		Small local 'Brown Field' sites underused.	This comment is noted with reference to the forthcoming consultation on the Council's Sites Allocation development plan document in the summer of 2020.
81	Andrew Sivyler		Ageing population in local area.	The draft Plan considers the borough's demographic profile as reflected in local areas.
82	Andrew Sivyler		Limited local employment.	The draft plan seeks to boost employment provision throughout the borough, particularly in the identified strategic locations.
84	Andrew Sivyler		Renovation in sympathy with the 'semi-rural' forest environment- low rise buildings, roof gardens?, start business premises? changes that anticipate evolving life styles	The concern raised about the impact of growth on local character is recognised. The draft Local Plan contains a range of policies to guide growth and change and to ensure that new development is carried out in harmony with its setting and makes a positive contribution to the local environment. See Policy 5 (Approach to Intensification and Policy 62 (High Quality Design) and Policy 63 (Tall Buildings). Other policies also consider amenity and other issues relating to local character. All of these policies are considered in decision making, ensuring that an appropriate balance is maintained between competing objectives and that new development is sensitively designed.

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89	Alison Brand		As the document rightly states it is the gateway to our gorgeous and ancient forest.	The draft Local Plan contains a range of policies to guide growth and change and to ensure that new development is carried out in harmony with its setting and makes a positive contribution to the local environment. It contains policies to protect the Green Belt and Epping Forest. See Policy 87.
90	Alison Brand		I am concerned that areas of our Greenbelt are haplessly being considered for development	The Local Plan is supported by the findings of the Waltham Forest Green Belt and Metropolitan Open Land Study (2015 updated in 2019). Challenging housing targets imposed by the Mayor of London and by central government suggest that it may be appropriate in limited circumstances that the Council consider opportunities to tidy up the boundaries of the Green Belt. There are, however, no site allocations and no plans for large-scale Green Belt release.
91	Alison Brand		The feel of North Chingford is more 'village like' than the rest of the borough and thrives with its own cultural identity.	This comment is noted. The Local Plan is underpinned by the Councils' Characterisation and intensification Study (2019) which informs the development principles set out in Policy 18. It contains a range of policies to guide growth and change and to ensure that new development is carried out in harmony with its setting and makes a positive contribution to the local environment.
92	Alison Brand		My great concern is that inappropriate housing will be shoehorned into our area that takes no account of the beautiful architecture that is existing. The aim is simply to fit as many people into an area. This brings its own problems.	This comment is noted. The Local Plan is underpinned by the Councils' Characterisation and intensification Study (2019) which informs the development principles set out in Policy 18.
93	Alison Brand		Our local schools are already oversubscribed, our doctors' surgeries stretched with appointments regularly taking two or more weeks.	The Local Plan will be supported by an up to date Infrastructure Delivery Plan in line with the requirements of the NPPF (2019) and the Intent to Publish London Plan 2019. This document provides a framework for how the requisite infrastructure will be funded and located in order to deliver the growth required in the Local Plan.

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94	Alison Brand		Parking is an issue and more people bring more cars, where will they park? How will this effect pollution?	The Local Plan reflects the Council's commitment to TfL's Healthy Streets principles and the Mayor's Transport Strategy to provide low traffic liveable neighbourhoods. Comments in relation to parking issues are noted and the Council is committed to the reduction of private car use in the lifetime of this Local Plan. Policy 72 sets out the thresholds for car parking in the borough in line with the Intent to Publish London Plan 2019 which includes the contributions that future development may make in the extension of parking controls in the borough.
96	Alison Brand		To change Chingford Station into a housing, high rise with the station underneath will add noise, congestion, parking issues, hold ups on the main road to name a few.	Noted. No site allocations have been made in the Local Plan. A Site Allocations Development Plan document is being prepared for consultation later in the year.
97	Alison Brand		I have concerns regarding the proposed use of the Assembly Hall and feel that the proposal uses several words many times (diversify, intensify) but explains no detail at all.	Noted. No site allocations have been made in the Local Plan. A Site Allocations Development Plan document will be consulted upon later during 2020.
104	Sally Slade		Supporting the local high street e.g. Station Road.	Policy 18 (North Chingford) and policies 48-50 propose measures to address High Street retail decline.
105	Sally Slade		Care for Elderly. Building high quality housing, close to high streets. This would encourage older people to move from larger houses into smaller homes. This would free up larger properties for families. (policy 33C- very good idea!)	Support for the policy is noted.
106	Sally Slade		Improved transport links- more buses, increased frequency of trains.	The issues regarding frequency of buses and the need for better bus connections is noted. The Council will continue to work in partnership with TfL in developing appropriate sustainable transport policies that will assist in improving Waltham Forest's bus and rail network.
116	Rachel Thomas		The high street shops, reduce/subsidies business rates.	Policy 18 (North Chingford) and policies 48-50 propose measures to address High Street retail decline.

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117	Rachel Thomas		Don't over modernise or "squeeze" housing in without taking account of the infrastructure or character of the surrounding houses.	These comments are noted for further consideration.
118	Rachel Thomas		Preserve the village character of North Chingford.	The Strategic Location Policy for North Chingford aims to build on the character of the area and aims to enhance and support it. The Design and Heritage policies in the Local Plan also have a strong focus on enhancing and retaining character.
119	Rachel Thomas		Maintain the uniqueness of "North Chingford" Don't squeeze houses on to every possible available space. Just to meet London Plan and government housing targets.	The Strategic Location Policy for North Chingford aims to build on the character of the area and aims to enhance and support it. The Design and Heritage policies in the Local Plan also have a strong focus on enhancing and retaining character.
120	Rachel Thomas		Need to see "proposals" for the development of any sites proposed for housing, etc.	There are no site allocations in the Local Plan. The Council is preparing a separate Site Allocations Document for consultation later in the year.
121	Rachel Thomas		Any change of use for high street retail and business for housing development.	Chapter 11 of the Local Plan sets out how the Council will seek to protect and enhance the business and retail environment in compact areas of the borough's centres. Where residential development may be appropriate, it would generally be directed to the upper floors of developments in order to maintain the integrity of the designated centre.
124	Mr David Matson		Expensive property prices.	The housing policies in the Local Plan are aimed at the provision of appropriate levels of affordable housing in terms of provision, tenure and mix. The Plan, however, does not influence market prices.
125	Mr David Matson		Traffic congestion and pollution.	Chapter 15 carries forward the Mayor's Transport Strategy and the LBWF 2020 Vision for Transport Policy 67 focusses attention on reducing private car usage and promoting public transport, walking and cycling. These measures are hoped to reduce traffic congestion and reduce pollution. The transport policies also encourage the use of electric vehicles.

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126	Mr. David Matson		Declining high street.	Chapter 11 of the Local Plan sets out how the Council will seek to protect and enhance the business and retail environment in compact areas of the borough's centres.
127	Mr. David Matson		Greener.	This comment is noted.
128	Mr. David Matson		Less vehicle traffic.	The Local Plan reflects the Council's commitment to TfL's Healthy Streets principles and the Mayor's Transport Strategy to provide low traffic neighbourhoods.
129	Mr. David Matson		Local services.	Policy 18 (North Chingford) and policies 48-50 propose measures to address services in the area.
130	Mr. David Matson		It is impossible to comment on "place-making principles" without knowing LBWF views on local character & distinctiveness. Please release and circulate the Character Study ASAP.	This comment is noted. The Local Plan is backed by the Characterisation and Intensification Study evidence base document which can be found on the Council's website at https://walthamforest.gov.uk/sites/default/files/LBWF%20Character%20and%20Intensification%20Study%2C%202019.pdf
132	Mr. David Matson		I endorse an extended role for the Chingford Assembly Hall and library. The best way to develop its role is with local residents, the primary potential users. No method is suggested. Citing the role of local plans is not a sufficient response when local people are willing and able to help.	This comment is noted. Further consultation will be undertaken on site specific proposals, providing opportunity for local residents to contribute and help shape these proposals.
161	Francis Webb		I have been looking at the outline plans for the future of our part of the borough, I can't say I'm happy as a matter of fact I'm very unhappy that it appears to be bulldozing a scheme that will bring overcrowding.	The draft Local Plan does not contain specific site allocations but includes policies to guide the development of local areas.
162	Francis Webb		Where is the extra parking? It's no good expecting everyone rides a bike because that is dictatorial.	The Local Plan reflects the Council's commitment to TfL's Healthy Streets principles and the Mayor's Transport Strategy to provide low traffic neighbourhoods.
163	Francis Webb		Where are the extra doctors? It already takes 2 weeks to get an appointment.	The Local Plan will be supported by an up-to-date Infrastructure Plan that will match population growth and demand with the requirement for health services.

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164	Francis Webb		Schools are oversubscribed.	The Local plan will be supported by an up-to-date Infrastructure Plan that will match population growth and demand with the requirement for schools.
165	Francis Webb		At this moment in time you have just informed me there's no funds to resurface my road.	This is an operational highways matter outside the strategic scope of the Local Plan.
187	Mrs Christine Straub		I attended the planning consultation on 31 July at Chingford Assembly Hall and would like to place on record my opposition to the proposed development of Station Road, North Chingford (particularly by the bus station/station) for the following reasons. I take the term "sensitive intensification" used in the leaflet as a subtle way of saying that the Council intend to build as many flats as possible in this particular area.	This comment is noted. Indications given in the Local Plan are general in nature. The Local Plan does not contain specific site allocations.
191	Mrs Christine Straub		The police are stretched to the limit by the trouble caused by the late-night bars that are located opposite the bus station. On Sunday, 4 August, residents were woken by the sound of police/ambulance sirens at around 2.30am when two customers from the Essex House had a slight disagreement and one of them ended up with a slashed face. It is a regular occurrence to hear the police sirens when the customers leave after a heavy night drinking. Late night licences should never have been given to venues in a residential area. These properties were never intended for this use.	This comment is noted. Licensing is not a planning matter.
192	Miss Anna Misterska		I am concerned that you are talking about adding additional floors to existing buildings. You have correctly identified that HP is a unique suburb-like area with semi-detached houses. Building anything higher than 3 floors would change (for the worse) the character of the area.	The concern raised about the impact of growth on local character is recognised - that new development could become inappropriate to the existing local context. The draft Local Plan contains a range of policies to guide growth and change and to ensure that new development is carried out in harmony with its setting and makes a positive contribution to the local environment. See Policy 5 (Approach to Intensification and Policy 62 (High Quality Design) and Policy 63 (Tall Buildings). Other policies also consider amenity and other issues relating to

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				local character. All of these policies are considered in decision making, ensuring that an appropriate balance is maintained between competing objectives and that new development is sensitively designed.
194	Mrs Christine Straub		If they build on the bus station where will the buses wait or will they not wait at all. Will the bus station become a thing of the past like "Omnibus Way" in Walthamstow. The train station car park is not suitable as you can see when we have rail replacement buses and they all sit in Station Road. If they build on top of the buses how high will this go and what a lovely view for "the gateway to Epping Forest".	There are no site allocations in the Local Plan. A Site Allocations document which deals more particularly with specific sites will be consulted upon later in 2020.
202	Mrs Christine Straub		Station Road can hardly be described as a vibrant shopping centre. We do not have a green grocers or a proper supermarket now. It is full of cafes, restaurants, bars, beauty parlours, charity shops and empty properties.	The issues affecting the vitality and viability of the Borough's town centres are complex. The Council is addressing these challenges in a number of ways such as through the preparation of town centre strategies and other regeneration initiatives. The Council is working to prepare a High Street Strategy for North Chingford. Further information will be published.
225	Mike Lang		The area is home to a lot of people that drive for a living, cab drivers and tradesmen	It is not clear from this response the specific planning issue raised and the policy changes required.
226	Mike Lang		Better road transport to counter increased demand from denser housing. Less concentration of residential- replace some jobs locally	The Local Plan will be supported by an Infrastructure Delivery Plan, which will set out details of the borough's infrastructure requirements including transport. The plan also seeks to promote the development of mixed uses to boost local employment opportunities.
229	Carina Millshue		High air and noise pollution due to A406 and Edmonton incinerator and associated increased risk of illness/birth defects. Do not rebuild the incinerator!	The plan contains a range of policies to manage air pollution, noise and traffic. See policies 59, 62 ,64 and 93.
231	Carina Millshue		If you go ahead and build homes near the incinerator and a new incinerator go ahead, disclose the proximity to the incinerator and inclusive studies on health impacts to prospective residents.	The plan contains a range of policies to manage air pollution, noise and traffic. See also policy 58 on health impact assessments.

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232	Valerie Muscutt		Lack of car parking within new housing.	The Council is committed to the reduction of private car use in the lifetime of this Local Plan. Policy 72 sets out the thresholds for car parking in the borough in line with the Intent to Publish London Plan 2019.
233	Valerie Muscutt		Providing school, doctor, dentist, health care services, plus transport places.	The Local Plan will be accompanied by an Infrastructure Delivery Plan that assesses the need for these services against the predicted level of growth.
234	Valerie Muscutt		Better services for young people, social services and mental health provision.	The Local Plan will be accompanied by an Infrastructure Delivery Plan that assesses the need for these services against the predicated level of growth.
235	Valerie Muscutt		Provide green spaces within all developments.	The Local Plan (and the Highams Park Neighbourhood Plan) contain policies intended to promote urban greening and biodiversity.
237	Valerie Muscutt		More independent shops - fewer cafes.	The issues affecting the vitality and viability of the borough's town centres are complex. This includes the economic downturn, the growth in internet shopping, changed shopping habits and the continued influence of out-of-centre shopping. The Council is addressing the challenges affecting its town centres in a number of ways such as through the preparation of town centre strategies and other regeneration initiatives.
238	Valerie Muscutt		Safer streets - more police.	Ensuring that the borough is safe is a priority for Waltham Forest. See Policy 65 on Designing out Crime.
239	Valerie Muscutt		Better street cleaning.	The policies in the draft Local Plan seek to deliver the priorities for the borough, including the need to keep Waltham Forest clean and safe.
240	Valerie Muscutt		Cut crime.	Policies in the Plan seeks to create safe environments, incorporating appropriate design solutions and crime prevention measures that assist in reducing crime, the fear of crime and anti-social behaviour (See Policy 62 - Creating High Quality Places').

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247	Claire Watson		Key challenges which face this area include empty shops, too many fast food outlets, poor pavements. Cinema not being provided as agreed. Restriction on library funding.	The Council is addressing the challenges affecting its town centres in a number of ways such as through the preparation of town centre strategies and other regeneration initiatives. The Council is working to prepare a High Street Strategy for North Chingford. Further information will be published.
248	Claire Watson		Cinema development to happen.	The Council is committed to the delivery of this project.
249	Claire Watson		New microbrewery (proposed) to be agreed.	Proposals submitted for planning permission are considered on their merits in accordance with the development plan.
250	Claire Watson		Encourage new high-end shops to open, especially a butchers, bakery and framers.	The issues affecting the vitality and viability of the borough's town centres are complex. The Council is addressing these challenges in a number of ways such as through the preparation of town centre strategies and other regeneration initiatives to encourage a range of operators.
251	Claire Watson		Improve the estate at the end of Selwyn Avenue.	This comment is noted with particular reference to Policy 29, which seeks to encourage the redevelopment and intensification of existing housing estates.
252	Claire Watson		Cycle paths developed and pavements improved.	The Local Plan contains throughout commitments to the improvement of cycleways and the public realm. See Policies 68 and 69.
253	Claire Watson		Further development of community facilities near the lake.	It is noted that this comment also reflects the aspirations of the Highams Park Neighbourhood Plan.
254	Claire Watson		Library open daily with more children's groups.	The day to day operation of the Library (regarding opening hours) is outside the remit of the Local Plan. The Plan, however, contains policies to protect the loss of community facilities including libraries. See Policies 55 and 56.
260	Claire Watson		A general figure of '450 units' is too vague and fuels local fears for large blocks of flats to just meet numbers.	The growth targets included in the plan are based on evidence from the Growth Capacity Study 2019.

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261	Nur Karatas		Need just Oyster reader to let train stop between Highams Park and Chingford Overground Station.	The operation of train services is a matter for TfL. This matter is noted for referral and discussion with TfL.
262	Nur Karatas		As above to make travel easy, less commute to take a bus, travel make easy to reach workspace.	This comment is noted. The operation of train services is a matter for TfL. This matter is noted for referral and discussion with TfL.
273	Paul Burden		Trying to maintain its character and not become a high rise dormitory suburbs.	The plan contains a range of policies to guide the redevelopment of local areas/sites and to ensure that new development is well integrated with local character. References to sites do not earmark them specifically for development. The Council will be consulting on a Site Allocations document later in the year of 2020.
274	Paul Burden		GP/Medical facilities and education facilities are already heavily stressed.	The Local Plan will be supported by an up to date Infrastructure Delivery Plan in line with the requirements of the NPPF (2019) and the Intent to Publish London Plan 2019. This document provides a framework for how the requisite infrastructure will be funded and located in order to deliver the growth required in the Local Plan.
275	Paul Burden		I would like to see the recent revival of shops in the centre of Highams Park continue and expand (and not be restricted to the primary frontage).	The issues affecting the vitality and viability of the borough's town centres are complex. The Council is addressing the challenges affecting its town centres in a number of ways such as through the preparation of town centre strategies and other regeneration initiatives. Policy 59 seeks to encourage revitalisation, adaptation and regeneration in town centres and shopping parades. See also Policies 50 and 51.
280	Daf Bergin		Key challenges which face this area? Empty Sops, lack of a lido, which was taken away over 30 years ago.	The issues affecting the vitality and viability of the borough's town centres are complex. The Council is addressing the challenges affecting its town centres in a number of ways such as through the preparation of town centre strategies and other regeneration initiatives. Policy 59 seeks to encourage revitalisation, adaptation and regeneration in town centres and shopping parades. See also Policies 50 and 51.

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281	Daf Bergin		Shops need cars to be able to park free for longer to thrive.	This comment is noted. Parking is an operational, rather than strategic matter. The Council is addressing the challenges affecting its town centres in a number of ways such as through the preparation of town centre strategies and other regeneration initiatives.
284	Daf Bergin		How would like to see the area change? Waitrose, Marks and Spencer, stationery shop like Ryman and Santander.	The issues affecting the vitality and viability of the borough's town centres are complex. This includes the economic downturn, the growth in internet shopping, changed shopping habits and the continued influence of out-of-centre shopping. The Council is addressing the challenges affecting its town centres in a number of ways such as through the preparation of town centre strategies and other regeneration initiatives.
293	Cloey Hadwen		Just a note to say that we fully support HPPG in their comments on the draft local plan (attached letter). The intensification plans for Highams Park would irrevocably change the character of the community which the community has worked hard to build. The proposed plans are very concerning especially if they include plans to demolish real local assets such as the library, which is a community gem and local hub.	The plan contains a range of policies to guide the redevelopment of local areas/sites and to ensure that new development is well integrated with local character. References to sites do not earmark them specifically for development. The Council will be consulting on a Site Allocations document in 2020.
295	John Williams		Additionally we would strongly oppose the demolition of Highams Park Station which would destroy a valuable landmark and historically important building.	The Local Plan does not contain any allocation that would involve the demolition of Highams Park Station.
297	Mrs Louise Sandford		We support fully the proposals and comments in the attached letter from the HPPG. As residents of Highams Park for 10 years we are committed to living in the area for many years to come and our children attend local schools. We fully support the efforts of the HPPG in opposing the council vision for the area and we are disappointed the council has disregarded the work and effort of Gordon Turpin and his team of volunteers who regularly consult and keep local residents informed of all aspects of Highams Park life and how they only look to improve the area and support local activities like the library.	This is noted. The Council is committed to working with the Highams Park Planning Group to ensure that there is a good relationship between the Local Plan and the emerging Highams Park Neighbourhood Plan. There will be further opportunities for community engagement on the site allocations document and masterplan projects.

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298	Neil Franklin		Hi, I just want to back up the comments of the Highams Park Planning group with respect to the plan of building a minimum of 450 homes within 800 metres of the station. I feel this will definitely change the character of the area from a local area with a community village atmosphere to just a generic living area with no community feel. Highams Park has grown organically over the last 10 years and through a lot of local support, not local government, has gradually dragged the area from a run down, shops and facilities closing down your area to a vibrant area.	It is recognised that intensification could be associated with concerns about new development becoming inappropriate to their context. However, if well managed, intensification could provide positive benefits to improve the quality of local environments. The Plan contains a range of policies to guide the redevelopment of sites/areas whilst prioritising the protection of local character.
299	Neil Franklin		When Tesco's were finally given permission to build their flats against local wishes, we were promised a new medical centre, help with the schools which are busting at the seams. This has not happened.	The Local Plan will be supported by an Infrastructure Delivery Plan, which will set out details of the borough's infrastructure requirements. This document will set out what is needed, where it is needed and when it is needed. It will also set out the delivery mechanism to ensure the timely delivery of infrastructure. This document will be published with the final version of the plan.
300	Neil Franklin		I fear that Highams Park does not have the infrastructure for this type of development. Schools are full and already turning local families away. The only health centre in Highams Park is full to capacity with phone waiting times for bookings average 1 hour +.	The Local Plan will be supported by an up to date Infrastructure Delivery Plan in line with the requirements of the NPPF (2019) and the Intent to Publish London Plan 2019. This document provides a framework for how the requisite infrastructure will be funded and located in order to deliver the growth required in the Local Plan.
301	Neil Franklin		As for Highams Park station, you should send a representative to stand on the platform between 7.30 and 8.30. It just can't handle the capacity.	This comment is noted for further consideration.
302	Neil Franklin		Lastly, everyone in the area wants the library to stay. If this was knocked down where would young children go to read it revise. The whole idea is detrimental to the area.	There are no site allocations in the Local Plan and policies resist the loss of facilities such as libraries.
303	Tina Willis		I fully support the contents of the attached letter with one proviso: that I would be willing to support a lower level of housing development providing all properties built were	The growth target included in the plan for local areas is based on evidence from the Growth Capacity Study 2019, which considers the capacity of identified sites in local areas to deliver

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			exclusively for social housing (not mixed or 'affordable') and there was corresponding development of local infrastructure, ie. health and education facilities.	the proposed targets. This is an indicative target. In considering development proposals, other factors including site specific conditions and the impact on local character also apply. The plan contains a range of policies to guide new development in local areas. All of these policies will be considered in decision making, ensuring that an appropriate balance is maintained between competing objectives - in this case delivering growth and ensuring that new development makes a positive contribution to the local environment.
304	Carole Nunes and Edward Charlton		We as residents of Highams Park are very concerned at the proposed developments of building 450 homes in the centre. This will inevitably mean far more people living in the centre, without providing extra infra structures such as schools, medical centres and parking.	It is recognised that intensification could be associated with concerns about new development becoming inappropriate to their context and destroying much of what people see as valuable in their daily living environments. However, if well managed, intensification could provide positive benefits to improve the quality of local environments. The plan contains a range of policies to guide the redevelopment of sites/areas whilst prioritising the protection of local character.
305	Carole Nunes and Edward Charlton		We are already experiencing difficulties getting doctors' appointments due to increased numbers of patients, reduced water pressure caused by more people using the supply, streets being overcrowded by cars, inadequate parking facilities, loss of much used library and insufficient commerce.	The Local Plan will be supported by an up to date Infrastructure Delivery Plan in line with the requirements of the NPPF (2019) and the Intent to Publish London Plan 2019. This document provides a framework for how the requisite infrastructure will be funded and located in order to deliver the growth required in the Local Plan.
306	Carole Nunes and Edward Charlton		This development will change the whole face of Highams Park, and although we realise the need for new housing, we feel enough has already taken place in the form of many new blocks of flats. These flats are of a very poor quality, too expensive and many without parking. No doubt any future developments will follow the same pattern, not providing value for money.	It is recognised that intensification could be associated with concerns about new development becoming inappropriate to their context. However, if well managed intensification could provide positive benefits to improve the quality of local environments. The plan contains a range of policies to guide the redevelopment of sites/areas whilst prioritising the protection of local character. However, if well managed, intensification could provide positive benefits to improve the quality of local environments. The plan contains a range of policies to guide the

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				redevelopment of sites/areas whilst prioritising the protection of local character and the need to improve the quality of housing. Chapter 14 of the plan sets out the policies that will apply in creating high quality places.
307	Kate Ceeney		I want to state that I support the comments in the draft plan (Highams Park Neighbourhood Plan) as per the attachment	This comment is noted. See response to the HPPG (Gordon Turpin).
308	Mr Richard Ceeney		o whom this may concern, I am a resident of Highams Park and I support the comments in the attached letter. I was particularly concerned to read that the Highams Park Planning Group was not consulted before the draft Local Plan was circulated. Many residents have actively participated in a variety of consultations that the Planning Group have run, in the anticipation that these would then be taken into account at Local Authority level. After years of being ignored as an area, we had hope that the status of the Planning Group would enable our voices to be heard. Please do listen to the Planning Group - this is important. They have the support of the whole area. Happy to discuss further.	The earlier round of consultation at the Direction of Travel (Issues and Options) stage, offered the first opportunity for engagement on the contents of the plan. Following this, the purpose of the draft Plan consultation was to allow all stakeholders, residents, community groups and indeed everyone with an interest in Waltham Forest to comment on the draft plan at the same time before the plan is finalised. This is to allow opportunity for all competing and conflicting interests to be resolved at a single stage, rather than a series of consultation meetings with different groups and stakeholders, which clearly would have significant resource implications.
309	Amanda Haines		I would like to protest against such an enormous plan to so called regeneration the already beautiful North Chingford, indeed the whole of Chingford.	It is recognised that intensification could be associated with concerns about new development becoming inappropriate to their context. However, if well managed, intensification could provide positive benefits to improve the quality of local environments. The plan contains a range of policies to encourage moderate levels of growth and manage change in local areas by protecting local character and ensuring that an appropriate balance is maintained between competing objectives.
310	Amanda Haines		I have lived in North Chingford for 30 years my children were unable to stay in the area as they could not afford it.	The plan contains policies to deliver more housing including affordable housing provision. See policies 23 and 24.

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311	Amanda Haines		I feel the change in the area is not for the better and you are trying to make Chingford another Hoe St E17. This just makes me sad and very disappointed and quite frankly wanting to move out and away from the beautiful leafy suburb that I have known it as.	The growth target included in the plan for local areas is based on evidence from the Growth Capacity Study 2019, which considers the capacity of identified sites in local areas to deliver the proposed targets. This is an indicative target. In considering development proposals, other factors including site specific conditions and the impact on local character also apply. The plan contains a range of policies to guide new development in local areas. All of these policies will be considered in decision making, ensuring that an appropriate balance is maintained between competing objectives - in this case delivering growth and ensuring that new development makes a positive contribution to the local environment.
312	Amanda Haines		I think you should be ashamed of the plans you're putting forward. This isn't regeneration or reshaping it's destroying an area that doesn't need changing.	It is recognised that intensification could be associated with concerns about new development becoming inappropriate to their context. However, if well managed intensification could provide positive benefits to improve the quality of local environments. The plan contains a range of policies to encourage moderate levels of growth and manage change in local areas by protecting local character and ensuring that an appropriate balance is maintained between competing objectives.
313	Amanda Haines		You should be concentrating on the resurfacing of our roads and getting our police back on the borough to stop its decline, although I expect you want this to happen to give you the opportunity to make it a so called better place.	This comment is noted. Highways resurfacing is an operational matter dealt with by the Council's Highways section and policing through the Mayor of London and central Government.
314	Amanda Haines		We are already over populated but we do not need the monstrosity of your ideas going forward.	This comment is noted. It is recognised that intensification could be associated with concerns about new development becoming inappropriate to their context. However, if well managed intensification could provide positive benefits to improve the quality of local environments. The plan contains a range of policies to encourage moderate levels of growth and manage change in local areas by protecting local character and

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				ensuring that an appropriate balance is maintained between competing objectives.
315	Jill Storer		I support the HPPG comments on the draft Local Plan.	Support for the Highams Park Neighbourhood Plan is noted.
316	Alexia Fergus and Ian Walker		We are writing in response to the Local Plan consultation. We support the HPPG response set out in the attached.	Support for the Highams Park Neighbourhood Plan is noted.
317	Brian Storer-Goldstein		I support the HPPG comments on the draft Local Plan.	Support for the Highams Park Neighbourhood Plan is noted.
318	David Roper		I want you to amend your plans for Highams Park. Although we need more housing, I am against any plan for large buildings near Highams Park station and instead of the library.	The draft plan does not contain specific proposals for sites as referred to. The Council is preparing a Site Allocations document, which will provide such details. Further consultation on this document will take place later in the year. In considering development proposals, a number of factors including site specific conditions and the impact on local character also apply. The Plan contains a range of policies to guide new development in local areas. All of these policies will be considered in decision making, ensuring that an appropriate balance is maintained between competing objectives - in this case delivering growth and ensuring that new development makes a positive contribution to the local environment.
319	Ms Inga Bruce		As per the attached letter, I would like to register my support of the comments made by the Highams Park Planning Group, and request that these views are taken into consideration.	Support for the Highams Park Neighbourhood Plan is noted.
320	Denver Currie		I have reviewed the "Shaping the Borough" documentation with a particular interest in Highams Park. Whilst I am pleased to see such a thorough document and that there is long term Consideration for the area - I do have concerns with the proposed developments, in particular the proposal for 450 new	It is recognised that intensification could be associated with concerns about new development becoming inappropriate to their context. However, if well managed, intensification could provide positive benefits to improve the quality of local environments. The plan contains a range of policies to guide the

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			homes within 800m of the station. feel is beyond excessive and would impact the culture of the local area considering Highams Park is a gateway to the forest. The document does also seem to contrast with the Highams Park Plan which outlines growth for the local area whilst keeping its spirit in mind. Please note I have also reviewed in full the Highams Park Planning Group's response which I attached to reference that I agree with their response in full and echo their comments.	redevelopment of sites/areas whilst also protecting local character.
321	Katie Padilla Jones		Please see the attached letter, in response to your plans to develop Highams Park, written by the Highams Park Planning Group. I agree with everything written wholeheartedly.	This comment is noted. See response to HPPG (Gordon Turpin).
322	Albert Norman		Please note that I agree with the attached letter.	Support for the Highams Park Neighbourhood Plan is noted.
323	Maria Bertarelli and Paul Malcolm		We write with regards to the draft Local Plan, specifically with regard to the area of Highams Park. We are members of the Highams Park Planning Group (HPPG), and fully support the views held in the attached letter from them to yourselves.	This comment is noted. See response to HPPG (Gordon Turpin).
324	Maria Bertarelli and Paul Malcolm		Having lived here for over 30 years, we would like to retain the village feel and green spaces that Highams Park provides, including the station building and library. We support new developments, but these should be in keeping with the historic character of Highams Park, and not change Highams Park into an urban concrete jungle (which often attracts undesirable behaviours).	It is recognised that intensification could be associated with concerns about new development becoming inappropriate to their context and destroying much of what people see as valuable in their daily living environments. However, if well managed, intensification could provide positive benefits to improve the quality of local environments. The plan contains a range of policies to guide the redevelopment of sites/areas whilst prioritising the protection of local character and green and open spaces.
325	Sonja Klug		I'm alarmed at the suggestion to build 450 addition flats within 800m of Highams Park station, as I believe that this would lead to overcrowding and a significant deterioration of this area. The centre of Highams Park is already completely dominated by car and lorry traffic, traffic noise and traffic air pollution and any	It is recognised that intensification could be associated with concerns about new development becoming inappropriate to their context and destroying much of what people see as valuable in their daily living environments. However, if well managed, intensification could provide positive benefits to

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			increase in housing will only make this worse (even if flats don't come with parking - the infrastructure to support that many more people simply isn't there).	improve the quality of local environments. The plan contains a range of policies to guide the redevelopment of sites/areas whilst prioritising the protection of local character and green and open spaces.
326	Sonja Klug		I fully agree with the assessment of the Highams Park Plan, in particular the following paragraph: "We are in favour of sustainable development and appreciate the important aims of the golden threads, however, in implementation of bullet point 4 the Local Plan Vision, the following requirements should be included in the attendant strategy. Delivery of housing targets should not be delivered in such away so as to only provide minimum standards and should not be "squeezed in" such that development overcrowds existing residential areas to the detriment of existing residents or adversely affects the character of areas which are valued by existing residents. Land optimisation should take into account the aesthetic, the historic context and the value of existing buildings such as may be identified as important by local communities in each area designated for development.	The plan contains a range of policies to encourage moderate levels of growth and manage change in local areas by protecting local character and ensuring that an appropriate balance is maintained between competing objectives.
328	Gary Dutton		Please note I fully support the reply on behalf of the HPPG, submitted to you by Mr Gordon Turpin. I am genuinely horrified that your proposals, if implemented would destroy the nature of this community.	It is recognised that intensification could be associated with concerns about new development becoming inappropriate to their context and destroying much of what people see as valuable in their daily living environments. However, if well managed intensification could provide positive benefits to improve the quality of local environments. The plan contains a range of policies to guide the redevelopment of sites/areas whilst prioritising the protection of local character and green and open spaces.
329	Pauline Anderson		I am writing to say that I do not agree with your proposed plans for 'shaping the borough' in Highams Park. There are too many homes proposed without adequate infrastructure and this will put too much pressure on local schools, GP surgeries and	The Local Plan will be supported by an Infrastructure Delivery Plan, which will set out details of the borough's infrastructure requirements. This document will set out what is needed, where it is needed and when it is needed. It will also set out the

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			transport links. Highams Park is a small area and it cannot sustain such a large expansion. I appreciate there is a need for more homes etc but this will adversely impact on the area.	delivery mechanism to ensure the timely delivery of infrastructure. This document will be published with the final version of the plan. Policy 2(c) makes clear that planning permission will only be granted for new development if it can be demonstrated that there is, or will be, sufficient infrastructure capacity to support and meet growth requirements.
330	Pauline Anderson		We have already had extensive development with the inclusion of Tesco and all the housing that came with that and shops that sat empty for years on end. And the roads already struggle with the level of traffic. Therefore, please note I strongly object to this proposal.	It is recognised that intensification could be associated with concerns about new development becoming inappropriate to their context. However, if well managed, intensification could provide positive benefits to improve the quality of local environments. The plan contains a range of policies to encourage moderate levels of growth and manage change in local areas by protecting local character and ensuring that an appropriate balance is maintained between competing objectives.
331	Linda Cox		I fully support the comments from the HPPG (Highams Park Planning Group) Highams Park plan on the draft local plan. There is not enough infrastructure to cope with all this, and it will ruin the character of the area and make it an awful place to live. I'm sorry but enough is enough.	It is recognised that intensification could be associated with concerns about new development becoming inappropriate to their context. However, if well managed intensification could provide positive benefits to improve the quality of local environments. The plan contains a range of policies to encourage moderate levels of growth and manage change in local areas by protecting local character and ensuring that an appropriate balance is maintained between competing objectives.
336	Mike Chrimes		Poor transport - roads too crowded and for the north of the borough areas the road transport is poor.	The Local Plan accounts for the Mayor's Transport Strategy and the LBWF 2020 Vision for Transport, focussing attention on reducing private car usage and promoting public transport, walking and cycling. These measures are intended to reduce traffic congestion.

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337	Mike Chrimes		More public transport.	TfL is responsible for the provision of public transport. This point is noted for referral and discussion with TfL.
339	Mrs Janet McArthy		I whole-heartedly support the response given by the HPPG and urge the council to be more considerate of the existing residents of Highams Park and the considerable amount of work and consultation that has taken place to develop the Highams Park Plan and to develop community projects around the area.	This is noted. The Council has made a commitment to work with the Highams Park Planning Group to ensure that there is a good relationship between the Local Plan and the emerging Highams Park neighbourhood plan.
340	Mrs Janet McArthy		If the character of the area changes, most of this will have been in vain and will be a betrayal to the local people and their views, and the processes that the council are required to work within.	This is noted. The Council has made a commitment to work with the Highams Park Planning Group to ensure that there is a good relationship between the Local Plan and the emerging Highams Park neighbourhood plan.
341	Mrs Janet McArthy		If the character of the area changes, most of this will have been in vain and will be a betrayal to the local people and their views, and the processes that the council are required to work within.	The concern raised about the impact of growth on local character is recognised - in particular that new development could become inappropriate to the existing local context. However, if well managed, growth could provide positive benefits to improve the quality of local environments. The draft Local Plan contains a range of policies to guide growth and transformation of local areas to ensure that new development is carried out in harmony with its setting and makes a positive contribution to the local environment.
342	Mrs Janet McArthy		I have lived here for over 35 years and have been in the area for much of my life before then, from 1964 onwards, and feel that the community in Highams Park is more vibrant than ever, with many young families, and I would not want this spoilt.	The plan contains a range of policies to guide the redevelopment of sites/areas whilst prioritising the protection of local character and green and open spaces.
343	Alexia Fergus and Ian Walker		We support the HPPG response set out in the attached (Highams Park Neighbourhood Plan)	Support for the Highams Park Neighbourhood Plan is noted.
344	Peter Richardson		Please find in the attached file comments from the Highams Park Planning Group about the above Consultation. As a resident of Highams Park I agree with all of them.	Support for the Highams Park Neighbourhood Plan is noted.

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345	Marcus Skinner		I'm writing in relation to the local plans for the borough and specifically to express my opposition to the plan to build 450 homes within 800m of Highams Park Station.	It is recognised that intensification could be associated with concerns about new development becoming inappropriate to their context and destroying much of what people see as valuable in their daily living environments. However, if well managed intensification could provide positive benefits to improve the quality of local environments. The plan contains a range of policies to guide the redevelopment of sites/areas whilst prioritising the protection of local character and green and open spaces.
346	Marcus Skinner		While I recognise the importance of finding locations for new housing in London, the plan as proposed and the density of development will massively change the character of Highams Park, particularly if the development includes the demolition or redevelopment of existing services such as the library (which has just been saved from redevelopment).	It is recognised that intensification could be associated with concerns about new development becoming inappropriate to their context and destroying much of what people see as valuable in their daily living environments. However, if well managed intensification could provide positive benefits to improve the quality of local environments. The plan contains a range of policies to guide the redevelopment of sites/areas whilst prioritising the protection of local character and green and open spaces.
347	Marcus Skinner		Furthermore it appears unclear that the implications for local services have been adequately considered. Already GP service and commuter trains are over subscribed and would struggle to accommodate even a small percentage of 450 new families. Primary school catchment areas are also currently highly constrained due to demand.	The Local Plan will be supported by an Infrastructure Delivery Plan, which will set out details of the borough's infrastructure requirements. This document will set out what is needed, where it is needed and when it is needed. It will also set out the delivery mechanism to ensure the timely delivery of infrastructure. This document will be published with the final version of the plan.
348	Marcus Skinner		Would the council consider expanding the area of development (beyond 800m) or reducing the number of housing units?	The Plan acknowledges the role of small sites in contributing to housing needs throughout the borough and reflects the emerging London Plan (Policy H1) requiring boroughs to optimise the potential for housing delivery on all suitable and available brownfield sites especially sites with existing or planned public transport access levels (PTALs) 3-6 or which are

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				located within 800m distance of a station or town centre boundary. Accordingly, there is flexibility in the 800m figure.
349	Rosalind Richardson		Please find in the attached file comments from the Highams Park Planning Group about the above Consultation. As a resident of Highams Park I agree with all of them.	Support for the Highams Park Neighbourhood Plan is noted.
350	Gillian James		I take a pretty dim view of the latest plans for Highams Park. I want to reiterate my opposition to them and draw your attention to the attached document (Highams Park Neighbourhood Plan) which is more in line with my thinking and far more sympathetic to Highams Park.	This comment is noted. See response to HPPG (Gordon Turpin).
351	Rachel Naylor		I am a Highams Park resident and I support the comments in Gordon Turpin's letter to you of 4 September 2019, in which he expressed concern on behalf of the Highams Park Planning Group in relation to elements of the proposed Local Plan which impact on Highams Park.	This comment is noted. See response to HPPG (Gordon Turpin).
352	Rachel Naylor		Building high rise housing near Highams Park station with no parking and no additional school places would be detrimental to those of us who already live in the area, even those of us who are not immediately by the station, as it will have a knock on effect on street parking and school places.	It is recognised that intensification could be associated with concerns about new development becoming inappropriate to their context. The plan contains a range of policies to encourage moderate levels of growth and manage change in local areas by protecting local character and ensuring that an appropriate balance is maintained between competing objectives.
353	Rachel Naylor		The station platform is already quite crowded at rush hour and I feel sorry for people living further along the train line, who sometime struggle to get on the train as it is. There is no capacity to run more than 4 trains an hour due to lack of capacity at Liverpool Street and so adding more crowding to the existing trains is not a good idea.	The issues regarding transport are noted. The Council will continue to work in partnership with TfL in developing appropriate sustainable transport policies that will assist in improving Waltham Forest's bus and rail network.
354	Rachel Naylor		Please do not allow Highams Park to be ruined with high density, high rise housing! Additional lower density housing in	It is recognised that intensification could be associated with concerns about new development becoming inappropriate to their context and destroying much of what people see as

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			keeping with the area would be acceptable, as long as adequate parking and additional school places are provided for.	valuable in their daily living environments. However, if well managed intensification could provide positive benefits to improve the quality of local environments. The plan contains a range of policies to guide the redevelopment of sites/areas whilst prioritising the protection of local character and green and open spaces
355	Mike Chrimes		More appropriate housing.	The Local Plan contains robust policies for the design and provision of a variety of types of housing to accommodate the needs of all sections of the community. However, this comment is noted for further consideration.
367	Mr Dennis Richardson		With reference to the Local Plan 2020-2035, I would like to state that I fully support the letter from the HPPG attached. In my opinion the plan you have submitted is totally inappropriate for Highams Park and can only damage all the good work that has taken place to regenerate the area. There is clearly no infrastructure in Highams Park to manage such a plan.	Support for the Highams Park Neighbourhood Plan is noted. The Local Plan will be supported by an Infrastructure Delivery Plan, which will set out details of the borough's infrastructure requirements. This document will set out what is needed, where it is needed and when it is needed. It will also set out the delivery mechanism to ensure the timely delivery of infrastructure. This document will be published with the final version of the plan.
368	John Fisher		I support the attached letter from the Highams Park Planning Group and would add my own comments that the proposed 450 units in the area close by the station is far too large and will alter the character of the area. I am at a loss to see where such a number of units can go. Possible areas might include the demolition and development of the well used and loved library.	It is recognised that intensification could be associated with concerns about new development becoming inappropriate to their context. However, if well managed intensification could provide positive benefits to improve the quality of local environments. The plan contains a range of policies to encourage moderate levels of growth and manage change in local areas by protecting local character and ensuring that an appropriate balance is maintained between competing objectives.
369	John Fisher		The Highams Park, I can remember when the park had prefabs in it and an undertaking was given that they would be removed as soon as circumstances allowed	Development in parks is not acceptable on policy basis. This is to protect loss of public amenity value of parks and open spaces.

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370	John Fisher		Any development close by the railway track would need to take into account the noise and vibration from the passing trains.	The Plan contains policies to protect the amenity of occupiers of new developments. See policy 59. Planning applications are tested for amenity impacts and where necessary mitigation measures are applied.
371	John Fisher		While the current trend is for developments to have little car parking I am off the opinion that most households still want a car even if there are busses and trains nearby. Quite where the cars can be parked is not mentioned.	The Local Plan accounts for the Mayor's Transport Strategy and the LBWF 2020 Vision for Transport, focussing attention on reducing private car usage and promoting public transport, walking and cycling.
372	John Fisher		. 450 would be about half the size of a fair size council estate and would the local schools and health services be able to cope with such an influx of new residents? My opinion is No. Regards.	It is recognised that intensification could be associated with concerns about new development becoming inappropriate to their context and destroying much of what people see as valuable in their daily living environments. However, if well managed intensification could provide positive benefits to improve the quality of local environments. The plan contains a range of policies to guide the redevelopment of sites/areas whilst prioritising the protection of local character and green and open spaces.
373	Mrs Caroline Hankey		A town centre characterisation study needs to be carried out. The potential development sites close to Station Road should be published for the public now, with particular reference to the Assembly Hall and Library. Residents do not wish to see these transformed into dwellings.	The Council has published its Characterisation and Intensification Study (2019) on its website. Site allocations once complete will be published for consultation in 2020. Until then the Plan does not contain site allocations.
374	Mr Nicholas Williams		North WF is a fundamentally different area to the south, being much more 'open' in terms of open spaces, land use etc, and should be considered as such. It is not acceptable to apply the same broad principles for denser housing etc that may have been implemented/planned for South WF to Chingford/North WF. The 'exceptional character' that has been identified by the council must be maintained.	It is recognised that intensification could be associated with concerns about new development becoming inappropriate to their context. However, if well managed intensification could provide positive benefits to improve the quality of local environments. The plan contains a range of policies to encourage moderate levels of growth and manage change in local areas by protecting local character and ensuring that an appropriate balance is maintained between competing objectives.

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376	Mr Ashley Uglow		Road transport is a fact of life and even with substantial cultural change away from cars, there is a large need for vehicles on roads. Chingford/Highams park is pretty isolated with limited road routes in and out. Further development of the quantum indicated is not manageable. Reducing the flow of traffic on roads will more than offset the ideals outlined in this proposal.	The issues regarding transport are noted. The Council will continue to work in partnership with TfL in developing appropriate sustainable transport policies that will assist in improving Waltham Forest's bus and rail network.
379	Mrs Sharon Medhurst		North Chingford is not a particularly thriving high street with several shops/buildings closing down and vacant. I'm not sure where the references to it being so come from.	This comment is noted. The issues affecting the vitality and viability of the borough's town centres are complex. The Council is addressing the challenges affecting its town centres in a number of ways such as through the preparation of town centre strategies and other regeneration initiatives.
381	Mrs Juliet Guinness		North Chingford has a historic centre and village atmosphere, it is one of the main gateways to Epping Forest via the station and the surrounding roads and footpaths , it already has very easy access to the heart of the forest.	This comment is noted. The plan contains a range of policies to encourage moderate levels of growth and manage change in local areas by protecting local character and ensuring that an appropriate balance is maintained between competing objectives.
385	Mr Latiff and Singh		In principle, the policies are supported. A review of the Green Belt to help regenerate parts of Banbury Reservoir together and create a sustainable and safe neighbourhood.	This comment is noted. The Council has published both the Green Belt and Metropolitan Open Land Review 2015 and the 2019 Update on its website.
386	Mr Latiff and Singh		Policy 23 bullet 8 'leisure opportunities around and at Banbury Reservoir' needs to include the opportunity for other uses and activities to support local communities (existing and future), this includes employment, such as, small scale offices, warehouse and light industrial. Please refer to call for sites (ID:01) relating to land at Folly Lane (Banbury Reservoir [see call for sites ID:1]).	This comment is noted. The Council has published both the Green Belt and Metropolitan Open Land Review 2015 and the 2019 Update on its website. Submissions to the Call for Sites will be considered in the Council's Site Allocations document due for consultation in 2020.
392	Mr Michael Freeman		The reason we live here is for our peace, away from the noise and problems in other parts of the borough. The area is already experiencing traffic flow problems mainly at the junction of Kings Head Hill and Sewardstone Road. Tailbacks at rush hours are causing traffic to divert to several rat-runs down side streets such as Maida Avenue and Drysdale Avenue. Even the Shell	The issues regarding transport are noted. The Council will continue to work in partnership with TfL in developing appropriate sustainable transport policies that will assist in improving Waltham Forest's bus and rail network. The Local Plan reflects the Council's commitment to TfL's Healthy Streets principles and the Mayor's Transport Strategy to provide low

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			garage is used as a cut-through by impatient drivers. McDonalds drive-through has added to the traffic congestion. If any more homes are built in the Sewardstone Road area then chaos will ensue. The roads just can't take the traffic load at present, in the future how does the Council intend to relieve this situation. A mention was made at the Councillor led session at St Peter & Paul's last week that we should rely less on cars. That is no solution for the many pensioners and parents in the area that need their transport. Suggesting that Crossrail 2 will ease congestion just hasn't been thought through. The road between the reservoirs is usually jam packed at rush hours and how will people park their cars when they get to Ponders End. Unless traffic issues can be resolved adding extra Homes and their vehicles will only make matters worse.	traffic liveable neighbourhoods. Comments in relation to parking issues are noted and the Council is committed to the reduction of private car use in the lifetime of this Local Plan. Policy 72 sets out the thresholds for car parking in the borough in line with the Intent to Publish London Plan 2019, which includes the contributions that future development may make in the extension of parking controls in the borough
393	Mrs Bernadette Bergin		Parking in Richmond Road car park should be part of the vision as by 2040 it is anticipated that half of the cars in use will be electric. The absence of adequate parking will mean that the retail area will suffer as people will go to larger stores with free parking.	Comments in relation to parking issues are noted and the Council is committed to the reduction of private car use in the lifetime of this Local Plan. Policy 72 sets out the thresholds for car parking in the borough in line with the Intent to Publish London Plan 2019.
400	MR Mark Sheldrake		Please do not build tower blocks at heights higher than current buildings. The 1930s housing all have gardens that are only overlooked by neighbours and the introduction of more than 3-4 stories will not be a positive addition to this suburban area.	The plan proposes a range of policies to protect and enhance the character of the area and the natural spaces that surround it. The plan is backed by a Characterisation and Intensification Study (2019) which sets out a range of measures to ensure that new development is respectful of area character.
401	Mr David Crossman		This plan is just blue sky thinking. There are no specifics mentioned in this plan although there are other documents which give more specific information. The whole plan is flawed because of this as local people cannot see the actual proposals for their areas. This is an attempt by the council to get their plan approved before revealing any details of what they intend. This in itself at best is dishonest and at worst criminal. The council have used shame consultation events to try and appear	The Local Plan is a strategic plan for the whole of the borough which sets out the measures that the Council intends to promote to achieve conformity with the London Plan and the NPPF. A Site Allocations document which deals more particularly with specific sites will be consulted upon in 2020.

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			to be 'consulting' when in fact they are doing their best to avoid given anyone any specific information about their proposals. Shame on you Waltham Forest Council.	
404	Mr Colin Jenkins		I would like to object to the intensification of residential building in Highams Park, which I believe will have a detrimental effect on the character of the area and place great strain on what are already over-stretched infrastructure, such as roads and parking facilities. While I appreciate that demographic growth necessitates the building of some additional accommodation, this should be sensitive to the needs and existing nature of the local area and not risk having a detrimental impact on the local environment.	The Plan envisages approximately 450 dwellings in Highams Park over the Plan period to 2035. In order to meet the Mayor's targets, a large proportion of these will be expected to come forward on small sites. Development is expected to be spread through the area. The Plan is supported by a Characterization and Intensification Study which sets out approaches to intensification intended to respect existing area character.
406	Ms Kate Bundock		Larger shopping areas attract local people. Shops can now provide food and drink or sell or rent out properties, what appeal is there to set up new businesses?	The Local Plan is informed by an up to date assessment of retail need in the Waltham Forest Retail and Town Centres Study 2019. Policies 48, 49, 50 and 51 set out how the Council intends to promote the regeneration of retail in the borough's district centres.
407	Ms Kate Bundock		No cinema or adult education facilities	This comment is noted for further consideration.
414	Mrs christine Shepherd		As long as the vision really takes into account the unique nature of north Chingford, and does what it says it will do, I have no problem with it.	This comment is noted.
415	Mrs Gillian Moran		You state that this area has a distinct character, a conservation area etc, but what you actually intend to do will completely change how residents want North Chingford to be. We do not want to be Metropolitan, we want to retain our suburban village feel. We are the gateway to one of the most magnificent Forests in the UK.	The comments are noted. The plan contains a range of policies to encourage moderate levels of growth and manage change in local areas by protecting local character and ensuring that an appropriate balance is maintained between competing objectives.
420	Mr Richard Griffin		Across the borough the impact of development is outpacing the infrastructure to support it. A further 27000 houses will	Infrastructure will be covered in an up to date Infrastructure Delivery Plan which will accompany the Local Plan at the next consultation in 2020.

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			exacerbate this. Building should only be considered after local resources, including the impact of cars, are addressed.	
421	Mrs Lesley Thelwell		I do not agree to the possibility of a large development on Sewardstone/Kingshead junction. You explain it as being the 'Gateway' from Enfield. By the time the visitors/workers arrive after spending a considerable amount of time stuck in traffic coming through the reservoirs they certainly won't be looking at their surroundings. This development would only increase this traffic congestion.	The issues regarding transport and congestion are noted. The Council will continue to work in partnership with TfL in developing appropriate sustainable transport policies that will assist in improving Waltham Forest's bus and rail network. The Local Plan reflects the Council's commitment to TfL's Healthy Streets principles and the Mayor's Transport Strategy to provide low traffic liveable neighbourhoods.
422	Ms Webster		I do not feel that the documentation provided gives enough information and clarity about what the plans involve. The language and terms used are ambiguous, vague and confusing. I did try to gain some clarity by signing up and attending one of the events but this did not help. One of the people I spoke to was condescending and failed to give any clear information about the plans.	This comment is noted. it is proposed to amend the plan for better clarity and interpretation.
423	Mr P Heatherley		Policy 22 proposes 450 dwellings for this area although it is amongst the worst areas in London for public transport. In fact, the Area Investment Plan shows there is only capacity for 100-150 dwellings in the longer term and that will be dependent on Crossrail 2 (and presumably significant improvement to roadway and public transport towards Enfield). Re North Chingford - there would appear to be some merit to sensitive, low rise, development at the interface with the forest and provide an improved access to both. However, I cannot see how 300 new dwellings can be achieved without impacting the character of the area.	This comment is noted for further discussion as it is recognised that intensification could be associated with concerns about new development becoming inappropriate to their context and destroying much of what people see as valuable in their daily living environments. However, well managed intensification could provide positive benefits to improve the quality of local environments without adversely impacting upon area character. The reference to the Area Investment Plan is noted. However, this was an internal discussion document and does not form part of the Local Plan.
429	Mrs Janet Charlesworth		NORTH CHINGFORD I understand and support the need for development but experience of developments in other parts of the borough suggest only lip service at best is sometimes/often paid to place-making principles. For example, I would only	In practice, development proposals are considered in accordance with the development plan. The plan contains a range of policies to guide new development in local areas. All of these policies will be considered in decision making, ensuring

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			support development around North Chingford station that is no higher than the current station building and with significant spacing between any new buildings. Similarly around the Chingford Green area.	that an appropriate balance is maintained between competing objectives - in this case delivering growth and ensuring that new development makes a positive contribution to the local environment.
438	Mrs Karen Palmer		As your document states, North Chingford is a low density residential area with major green assets, and on the doorstep of the beautiful Epping forest. That is why people chose to live there. If they wanted to live in an area with high density dwellings they would have done so. How sad to think that you can proper building on every inch of land, removing shoppers car park and any open area. Bullshit proposals in your plan about improving leisure and cultural opportunities. The thin end of the wedge, what next? You start building over Epping Forest? I find this truly depressing and it's not just nimbyism. Sadly, I guess you will continue to ride roughshod and implement whatever he hell you like. I am just so sorry that I ever chose to live in Waltham Forest.	The comments are noted. It is recognised that intensification could be associated with concerns about new development becoming inappropriate to their context and destroying much of what people see as valuable in their daily living environments. However, well managed intensification could provide positive benefits to improve the quality of local environments without adversely impacting upon area character or in any way affecting Epping Forest. A further iteration of the Local Plan together with a Site Allocations document will be consulted on in 2020.
439	Mrs Yvonne Sanders		North Waltham Forest could be thriving network of culturally rich and distinctive town centres if the Local Authority would allow Free parking of at least one hour to encourage shoppers to visit. If more was done to attract new businesses by giving at least temporary relief on Business Rates.	Policy 72 sets out the Council's parking policies. It primarily seeks to manage parking requirements arising from new development proposals rather than the operational management of existing parking spaces. In any case this point is noted for further consideration as part of Town Centre Strategy work.
440	Mrs Catherine Branch		To quote 'Ensuring growth is sustainable and supported by infrastructure'. This is key!!	This comment is noted. Further consultation on the Local Plan will be undertaken later in 2020 and will include an up-to-date Infrastructure Delivery Plan.
441	Mr Jeremy Clayden		Waltham Forest has finite resources in terms of hospitals, doctor's surgeries, schools, school counselling services and children's mental health services to name but a few. These services are already stretched beyond maximum capacity. The boroughs services should be expanded first before new housing is built.	This comment is noted. Further consultation on the Local Plan will be undertaken later in 2020 and will include an up-to-date Infrastructure Delivery Plan.

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449	Mrs Claire Hudson		While I appreciate that some additional housing is required within the borough, I understand that LBWF is aiming to exceed the target figure set by the Mayor. I am concerned that, even without any of these additional homes, local services and infrastructure are at breaking point. Why is even a minimum increase being planned without first providing the necessary increased capacities in the areas of health care, education and transport?	The Council notes that the emerging London Plan (intent to publish version) has reduced the borough's housing target. The Council is currently considering its position on this matter. The Local Plan will be supported by an Infrastructure Delivery Plan, which will set out details of the borough's infrastructure requirements. This document will set out what is needed, where it is needed and when it is needed. This document will be published with the final version of the plan. Policy 2(c) makes clear that planning permission will only be granted for new development if it can be demonstrated that there is, or will be, sufficient infrastructure capacity to support and meet growth requirements.
450	Ms Sarah Chaney	Secretary Larkwood and Valley Branch Labour Party	The improvement of transport in South Chingford is vital in order to develop the area. Increased housing, business and other improvements at Chingford Mount or in the North Circular Corridor won't be successful without this. This area is one of the worst served parts of the borough for public transport. This needs to be considered at the planning stage as it will affect what development is possible. The plan gives a general overview of transport, but this differs for different strategic locations.	This is noted for further consideration. The Council is gathering evidence through a transport study.
452	Mrs Krysia Sivyer		The main shopping area Station Road has been in decline for many years, partly because high business rates and rents are not affordable for small, independent traders. There has been an influx of big traders, e.g. Tesco, Costa but character of a place is enhanced by artisan and individual character shops. Most high streets have suffered from internet shopping and those shops which have survived are those which provide a service which can't be provided by the internet e.g. hairdressers, nail bars, coffee shops, tattoo shops etc. A mix of leisure pursuits such as gyms, childcare provision, children's	The Council is addressing the challenges affecting its town centres in a number of ways such as through the preparation of town centre strategies and other regeneration initiatives. The Council is working to prepare a High Street Strategy for North Chingford. Further information will be published.

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			soft play, music centres etc bring a sense of community. A health centre in the high street would bring footfall.	
460	Mrs Linda Woods		My main concern is about the height and character of new developments. My view is that the Plan should clearly set out that developments should be in keeping with and enhancing the local area - in the case of N Chingford - no more than 3-4 storeys.	The concern raised about the impact of growth on local character is recognised - in particular that new development could become inappropriate to the existing local context. The draft Local Plan contains a range of policies to guide growth and change and to ensure that new development is carried out in harmony with its setting and makes a positive contribution to the local environment. See Policy 5 (Approach to Intensification) and Policy 62 (High Quality Design) and Policy 63 (Tall Buildings). Other policies also consider amenity and other issues relating to local character. All of these policies are considered in decision making, ensuring that an appropriate balance is maintained between competing objectives and that new development is sensitively designed.
461	Mrs Emily Heap		I believe that Highams Park could manage further housing but that local resources such as the GP surgery/transport may need expanding.	This is noted. The Local Plan will be supported by an Infrastructure Delivery Plan, which will set out details of the borough's infrastructure requirements including GP services and transport. This document will set out what is needed, where it is needed and when it is needed. This document will be published with the final version of the plan.
463	Mrs Leila Belcarz		The streets around Highams Park station already have extensive parking problems, owing to the lack of controlled parking and the number of commuters parking on these streets. All of this is to the detriment of existing residents. If 450 or more new homes are developed, this will put even more pressure on these streets, as residents of those developments (most of which are designated as car free) park their cars on them too. This is completely unsatisfactory and untenable. It is very disappointing that the plan does not recognise this to be a legitimate consequence of the volume of new homes being	The parking situation in Highams Park, in particular the lack of CPZ is noted. The need for a CPZ in this area is noted for consideration. Policy 72 sets out the Council's policy on parking. Mindful of the growth target indicated, the NPPF policy to promote sustainable travel modes that limit future car use as also included in the London Plan, the policy supports car free development in the North Area of the borough in locations that are well-connected to public transport, active travel networks, and with other amenities. The challenges in enforcing car free development is noted for further consideration.

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			<p>developed and does not contain robust plans to manage this. While car free developments have been proposed, these are ultimately ineffective at managing the volume of parking congestion if there is no controlled resident parking zone to reinforce them. The reality is that most residents in Waltham Forest do own cars (sometimes multiple cars), particularly if they have young families or are elderly. While some residents may cycle, the majority do not and simply will not. The council needs to be realistic, fair and pragmatic about these issues. The plan should include proposals to mandate a controlled resident parking zone around the station (rather than leaving it to the discretion of residents) to ensure that car free developments in this area really do have to be "car free" as there will be no physical options or entitlement for new residents to park in these areas. Alternatively, existing policies (e.g. the vehicle cross-over policy) should be relaxed for existing residents that will be adversely affected, to ensure they are able to park their vehicles in priority to the residents of the 450 or more new homes and commuters.</p>	
465	Mrs Vikki Spencer		<p>It is ridiculous of the council to think adding so many houses/dwellings to the area as described in policy 18 to 22 will improve the north Chingford, Sewardstone and mount area, it will categorically do the opposite! It will add additional stress to the infrastructure in terms of availability of local doctors, schools, transport links etc ! It will add further congestion to local roads and add stress to parking in the vicinity. It will increase pollution and anti social behaviour. It will increase rubbish on the streets and basically turn a beautiful area into the same as Walthamstow which is over populated, dirty, congestion filled. It will lose the beauty and sense of community and respect that the local residents have for its wonderful surroundings. Personally, the council beautification of what is</p>	<p>The Council notes the concern expressed about the policy on intensification and its likely implications. However, if well managed, intensification could provide positive benefits to improve the quality of local environments. The plan contains a range of policies to guide redevelopment covering parking, infrastructure provision, pollution etc. to manage likely adverse implications. All of these policies will be considered in decision making, ensuring that an appropriate balance is maintained, and problems minimised.</p>

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			just a way for the council to make more money out of taxation in the borough is in my opinion disgusting! Having lived in Chingford since I was 1 yrs old and indeed in the borough all my life it's hugely disappointing. I strongly oppose this proposal.	
466	Mrs Marie Penberthy		How can you build more homes when there are not enough schools and hospitals for the existing residents. You want to bring people to the area but there is no parking for existing shops which is why there are so many empty shops. North Chingford has a high population of elderly who rely on cars, public transport and bike lanes aren't going to help them. You want more social housing which just brings more crime to an area which has seen high crime rates. Not enough police. E4 was recently named the postcode with the highest number of car thefts in the country. Nothing is being done about it.	The Local Plan will be supported by an Infrastructure Delivery Plan, which will set out details of the borough's infrastructure requirements including schools, health care, transport etc. This document will set out what is needed, where it is needed and when it is needed. This document will be published with the final version of the plan. Policy 2(c) makes clear that planning permission will only be granted for new development if it can be demonstrated that there is, or will be, sufficient infrastructure capacity to support and meet growth requirements.
470	mr tom manifold		This plan is poor and will bring no benefit to the area. The high-density housing that will inevitably result from this plan will be nothing but detrimental to the area, leading to a loss of character for the area, overcrowding, reduced infrastructure that already struggles with the current population of the area. The plan has not taken into account the nature of the area of north Chingford, which is not a suitable area for the proposed development.	The concern raised about the impact of growth on local character is recognised - in particular that new development could become inappropriate to the existing local context. The draft Local Plan contains a range of policies to guide growth and change and to ensure that new development is carried out in harmony with its setting and makes a positive contribution to the local environment. See Policy 5 (Approach to Intensification and Policy 62 (High Quality Design). Other policies also consider amenity and other issues relating to local character. All of these policies are considered in decision making, ensuring that an appropriate balance is maintained between competing objectives and that new development is sensitively designed and there is supporting infrastructure provision.
471	Miss Katherine Waldrab		You are planning far too much housing for the north of the borough. Over the past 20-30 years people have worked hard to afford mortgages for houses in the north of the borough as it is by far the nicest area of the borough, house prices are higher here than anywhere else in the borough. By increasing the	The concern raised about the impact of growth on local character is recognised - in particular that new development could become inappropriate to the existing local context and will ruin the area. The draft Local Plan contains a range of policies to guide growth and change and to ensure that new

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			housing levels you are affecting so many people who have lived here for so long. The state of the borough will be ruined. I am all for more housing but I feel you are planning too many homes for such small areas. No one in the north would want high rise buildings and one can only assume this is what you can offer when you are squeezing 450 in the Sewardstone area and another 300 in North Chingford. In principle the borough does need some improvement but you are planning for too much for such a small and quaint area of the borough I fell you will ruin all the hard work and love that has been put into the north by those whom have lived and worked in these areas for so long.	development is carried out in harmony with its setting and makes a positive contribution to the local environment. See Policy 5 (Approach to Intensification and Policy 62 (High Quality Design) and Policy 63 (Tall Buildings). Other policies also consider amenity and other issues relating to local character. All of these policies are considered in decision making, ensuring that an appropriate balance is maintained between competing objectives and that new development is sensitively designed and comes with supporting infrastructure.
476	Miss Sian Edwards		Too many 'new homes' in a small area. 'Affordable' Home's needs for families. Therefore a smaller number of houses should be built. Not flats packing people in like sardines. No allocation for parking but still causing further traffic on the roads and no additional plans for doctors or schools.	The concern raised about the impact of growth on local character is recognised - in particular that new development could become inappropriate to the existing local context. The draft Local Plan contains a range of policies to guide growth and change of local areas to ensure that new development is carried out in harmony with its setting and makes a positive contribution to the local environment and other issues such as parking and infrastructure are well managed.
480	Mrs Sarah Sanders	Committee Member DADRA	Regarding the achievement of minimum growth targets of 450 new homes, the DADRA committee believe this level of building would be an over intensification of the area - dramatically changing the character of the area and its village feel. The disparity between the provision of new homes and jobs will further diminish the local community as people are forced to travel further for work.	The growth targets included in the plan is based on evidence from the Growth Capacity Study 2019. The concern raised about the impact of growth on local character is recognised - in particular that new development could become inappropriate to the existing local context. The draft Local Plan contains a range of policies to guide growth and change and to ensure that new development is carried out in harmony with its setting and makes a positive contribution to the local environment. See Policy 5 (Approach to Intensification and Policy 62 (High Quality Design) and Policy 63 (Tall Buildings). Other policies also consider amenity and other issues relating to local character. All of these policies are considered in decision making, ensuring

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				that an appropriate balance is maintained between competing objectives and that new development is sensitively designed.
483	Ms Alison Hill		North Chingford is an area where people drive in to visit from Essex as well as borough wide residents visiting for the forest, but it is not necessary for cycle lanes as the area is safe as it is. People know what it is like there and money should not be wasted 'improving ' access. It is a distinct area so should not be altered too much. Likewise new homes should be in keeping with the current housing. It could do with improved shopping and cultural facilities but this would happen anyway if people could afford to stay there and had good transport links and if shop keepers could afford rates and rents.	This point is noted. However, the Council must plan for growth in accordance with both national and London Plan policy requirements. The draft Local Plan contains a range of policies to guide growth and change where development opportunities exist. In meeting growth requirements, the plan also seeks to ensure that new development is carried out in harmony with its setting and makes a positive contribution to the local environment.
486	Ms Helen Chilvers		I object to your plans in North Chingford. North Chingford is a town full of character next to Epping Forest. It feels like a village and I fear that your plans will destroy the character of North Chingford. North Chingford has much architectural heritage. If you build large, ugly blocks of flats you will destroy the character and heritage of North Chingford.	The concern raised about the impact of growth on the character of North Chingford is recognised - in particular that new development could become inappropriate to the existing local context. The draft Local Plan contains a range of policies to manage growth and to ensure that new development is carried out in harmony with its setting and makes a positive contribution to the local environment.
497	Mrs Joanne Noakes		The area of North Chingford in particular is very unique with the close proximity to Epping Forest any development in this area will harm the connection to the forest and the area would lose its village feel. North Chingford cannot sustain another 300 homes, the infrastructure could not cope.	The Council notes the concern expressed about the policy on intensification and its likely implications. However, if well managed intensification could provide positive benefits to improve the quality of local environments. The plan contains a range of policies to encourage moderate levels of growth, and manage change in local areas by protecting local character and ensuring that an appropriate balance is maintained between competing objectives.
500	Mr John Avis		The minimum growth target for Highams Park of 450 homes (approx) is way to high and it should be far less. There must be a maximum number of storeys or a height limitation. A limit of	The growth targets included in the plan is based on evidence from the Growth Capacity Study 2019, which considers the capacity of identified sites in local areas to deliver the proposed targets. This is an indicative target. In considering development

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			about 4 storeys would fit in with the existing Victorian and Edwardian housing which makes up most of Highams Park.	proposals, other factors including site specific conditions and the impact on local character also apply. The plan contains a range of policies to guide new development in local areas. All of these policies will be considered in decision making, ensuring that an appropriate balance is maintained between competing objectives - in this case delivering growth and ensuring that new development makes a positive contribution to the local environment.
502	Mr Oliver Gover		Given the restrictions in place involving where to build, the options in Chingford are limited as the somewhat desperate proposals to build on the land near Chingford Station and the driving test centre suggest. However, the impact of what is built will depend on the quality of its design. Currently the Government has instructed the Building Better, Building Beautiful Commission to report on how the aesthetic quality of new build developments may be improved. Its interim report quotes William-Ellis: "The home healthy, the house beautiful, [and] the town pleasant." I hope these principles will be adhered to and the borough will avoid the blight of shoddily built and quickly thrown up near slums that have proliferated in Britain over the last few decades.	This point is noted. Chapter 14 of the Plan contains policies to improve the quality of the built environment. These policies generally reflect the principles mentioned.
505	MS SUSAN CLARK		What are the development principles? All that I can see is a desire to impose housing in various "secret" locations. The things that make the area special are not properly acknowledged. There has been no local authority investment in the area for several years, the Conservation area appraisal was last carried out in 2011 and none of the recommendations and suggestions were acted upon. The area's saving grace is the proximity to Epping Forest and the fact that Forest land is owned by the City of London.	It is proposed to review the development principles acknowledging the points made.

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513	Mr Fabio Cimelli		Anything which positively impacts on the borough such as more free parking on Station Road, eliminating no Right Turns into streets between 7am and 9.30am each morning when all people do is U turn and turn left into them creating another problem, eliminating cameras showing people encroaching in Box Junctions for less than 5 seconds, enforcing no commuter parking on Beresford Road between 10-11am which is regularly flouted.....would all be areas welcomed as a positive Vision for the borough	This is noted. However, this is a highway/traffic management issue best considered and taken forward by the Council's Highways and Traffic Management Team.
514	Mr and Mrs Richard Cleveland		The North Chingford area is a low rise suburban area, unique in its relationship with the highly protected Epping Forest. It is, in many respects still a village, with its own high street and low rise buildings. The area already has a culturally diverse population which is the natural result of London's fluid population movement especially for those families with young children looking for a less crowded built environment. This means that many of those who have moved into the area as the older generation has thinned out are commuters, with school age children and this has already put pressure on local infrastructure in the shape of schools, health care and transport.	The character of the North Chingford area as described is noted. The Local Plan will be supported by an Infrastructure Delivery Plan, which will set out details of the borough's infrastructure requirements. This document will set out what is needed, where it is needed and when it is needed. This document will be published with the final version of the plan.
521	Miss Stephanie Vanezis		I am extremely concerned that the whole essence of Chingford will be lost by the new plans. Chingford is the gateway to Epping Forest and by building dwellings so close to the greenery the whole feel of the place will be lost.	It is recognised that intensification could be associated with concerns about new development becoming inappropriate to their context and destroying much of what people see as valuable in their daily living environments. However, if well managed intensification could provide positive benefits to improve the quality of local environments. The plan contains a range of policies to guide the redevelopment of sites/areas whilst prioritising the protection of local character.
522	Mr Thomas Wise		North Waltham Forest provides essential diversity from the rest of the borough. It has evolved as part of Essex and much of the culture and nature of the area is far closer to Essex than	It is recognised that intensification could be associated with concerns about new development becoming inappropriate to their context. However, if well managed intensification could

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			Walthamstow and Leyton and it is for that reason that many of the residents have moved there. Increasing the density will detrimental to what makes Chingford and Highams Park unique and vibrant. There are few high rises and the proposed increases in density will result in greater congestion around key entry points and the existing lack of parking facilities will be exacerbated. We have lived in Chingford for over 30 years but would not remain if the proposed plans are followed through.	provide positive benefits to improve the quality of local environments. The plan contains a range of policies to guide the redevelopment of sites/areas whilst prioritising the protection of local character.
523	Miss Sarah De'Ath		Changes do not seem fitting with the character and charm that attracts some many people to the area. The area has changes positively over recent years with fantastic shops and community but these changes will effect retail whilst they develop new ones. The ones under Tesco's are already an eye sore and took a long time to be rented. The noise and air pollution from the development and increase in traffic will affect local people and the community at large.	It is recognised that intensification could be associated with concerns about new development becoming inappropriate to their context. However, well managed intensification could provide positive benefits to improve the quality of local environments. The plan contains a range of policies to guide the redevelopment of sites/areas whilst prioritising the protection of local character.
530	Mr Stuart Grix		The three centres will evolve into vibrant cultural and retail hubs for diverse cultural metropolitan suburbs = utter nonsense.	The London Plan sets the Council challenging housing targets for the borough. The Local Plan sets out a vision of how the delivery of new housing and employment will be spread across the borough where sites can be unlocked for delivery.
532	Mr Richard Dobbs		Who wrote this? Obviously someone who doesn't live near here or know anything about the area. This would destroy the whole character of both North Chingford and Highams Park. Chingford Mount needs regeneration of the shopping area. The amount of houses proposed for Highams Park would change it from a Hamlet to a massively overpacked characterless center. Highams Park has three highly thought of schools, that are all full and due to site restrictions couldn't not be developed further, we have a massively struggling doctors and two full dentists. The character of the area is its original houses the new builds are destroying the character of the area. Far too many houses especially Higham Park. Will destroy the character of	It is recognised that intensification could be associated with concerns about new development becoming inappropriate to their context. However, if well managed intensification could provide positive benefits to improve the quality of local environments. The plan contains a range of policies to guide the redevelopment of sites/areas whilst prioritising the protection of local character.

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			the area. Not in keeping with the area. Not sustainable for services even if these were improved the main area would be spoilt. Dreadful this will massively over develop the Highams Park. The amount and style of the new builds are stripping the culture and historical standing of the Highams Park area. This will result in Highams Park being gentrified. Services, buses, trains, doctors, schools cannot support this level of development. Highams Park already has its own cultural centre and shopping centre we do not want nor need one created. I do not agree with any of the ideas expressed for Highams Park.	
534	Mrs Thea North		Concerns about the failure to recognise the special and unique character of north Chingford , a low rise area with a village feel. Concerned about the possible height of new developments in north Chingford especially around the station. The area around the station is the first impression many visitors get of Chingford and Epping forest itself. Also car parking is already difficult and I would not like to see all car parks being lost to development - north Chingford is a suburban area and many people do not live within easy walking distance of the station or bus stops. Many are also elderly and need to use their cars - even with new housing and younger families moving in, the fact that there will remain many substantial and expensive private houses would seem to ensure that the current aging generation will only be replaced by the next generation of aging parents. Shops in station road are already finding it difficult to survive and lack of parking contributes to their decline. I appreciate more housing has to be built but this needs to be sympathetic to the character of the area as it presently is. Also Re encouraging walking and cycling in Epping Forest - people will not travel by bikes to the forest through suburban road areas on bikes with young children - all this encourages is more and more groups of young and not so young men riding through the forest with	It is recognised that intensification could be associated with concerns about new development becoming inappropriate to their context. However, if well managed, intensification could provide positive benefits to improve the quality of local environments. The Local Plan reflects the Council's commitment to TfL's Healthy Streets principles and the Mayor's Transport Strategy to provide low traffic liveable neighbourhoods. The Council is committed to the reduction of private car use in the lifetime of this Local Plan. Policy 72 sets out the thresholds for car parking in the borough in line with the Intent to Publish London Plan 2019, which includes the contributions that future development may make in the extension of parking controls in the borough.

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			little or no regard for walkers and eroding the forest paths and disturbing wildlife.	
537	Mr Roger Brown	Chair Love North Chingford	LNC surprised that following an agreement to work with planners, offer of a Special Planning Document for NC was withdrawn. LNC were contacted 10 days before the consultation opened to view the 'North of Borough flyer' draft which we thought inadequate and hastily prepared. During the consultation there was no up to date local evidence base for policies impacting North Chingford such as a current shop void rate of 10%. Policy here seems largely a cut and paste of the last plan, which assumed (incorrectly) all was well despite the 2016 GVA retail survey warning that NC should not become the forgotten centre.	The commitment to prepare Town Centre Strategies in the form Supplementary Planning Documents for the boroughs designated centres is included in the draft Local Plan. (See Paragraph 1.18). The Council is currently working to prepare a High Street Strategy for North Chingford. The Council's evidence base documents are published on the website. The need for up to date evidence is fully acknowledged. The draft plan commits to review the evidence base periodically and where necessary review the plan.
538	Mr Roger Brown	Chair, Love North Chingford	The preservation and enhancement of a village feel, the Edwardian environment of Station Road, being a unique gateway to the Forest and having an enhanced and potentially extended Green Conservation Area as a jewel in our crown is what LNC feel is valued about North Chingford. This is not reflected in the consultation materials, draft plan or draft Area Investment Plan. LNC Want to see improved shopping environment supported by the Council and LNC, a medium sized supermarket, more parking, craft and arts based outlets, niche retailers and a much better cultural offer, in part due to Council Policy on Libraries and Hall Hire costs. The library has been removed from the policy, and there has been offer for LNC to be involved in running the library has been rebuffed. Greater clarity is needed on the de-designation of secondary shopping areas. Refusal to contemplate guideline building heights in N. Chingford centre, where no building in Station Road is higher than 3 storeys. This should remain the limit, particularly at the sensitive Forest edge. The observation that	The AIP does not form part of the Local Plan having originated as an internal discussion document having no planning status. The subject of the Local Plan consultation was the Regulation 18 Shaping the Borough Draft Local Plan 2020-2035. Accordingly, we can only make the comment we recognise that intensification could be associated with concerns about new developments being seen as inappropriate to their context and destroying much of what people see as valuable in their daily living environments. However, if well-managed intensification could provide positive benefits to improve the quality of local environments. The plan contains a range of policies to guide the redevelopment of sites/areas whilst prioritising the protection of local character through the principles set out the Council's Characterisation and Intensification Study 2019.

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			<p>this area near the bus station is scruffy is no justification for high buildings over, or over development. The undervalued need for adequate parking for the NC centre to thrive as a retail centre. This is reflected in the Area Investment Plan where both the Richmond Road Shoppers Car Park and the Co-Op car park opposite are suggested as housing development sites. Concerns that NC will lose out to competing retail centres. Is the effectively downgrading of North Chingford Centre: Emphasis on other centres in the plan, including the elevation of Highams Park to a district centre. Residents have no enthusiasm to be more 'metropolitan' and terms surrounding 'vibrancy' are at tangent with the general feel of North Chingford. A significant degree of work remains to be done to develop the policy framework that will realise successful conservation and enhancement of the local historic environment. LNC supports the promised urgent review of the Green Conservation Area plan, it's area extension to The Parade frontage as far as Buxton Road, and improvements to The Parade itself to restore its Edwardian elegance. Note: its extent is incorrectly marked on the AIP draft. North Chingford District centre in poor shape, and urgently needs upgrading so that the retail centre re-establishes its links with the community. This is at odds with the borough direction of travel plan.</p>	
539	Ms Ruth Mattison		<p>Overcrowded transport, overcrowded schools, lack of local services for the current density of population. Improve transport links. Poor Council services such as road sweeping and bin collection.</p>	<p>These points are noted for consideration. The Local Plan will be supported by an Infrastructure Delivery Plan, which will set out details of the borough's infrastructure requirements. This document will set out what is needed, where it is needed and when it is needed. This document will be published with the final version of the plan.</p>
542	DNC Haines		<p>It is vital that doctors, ambulances, fire engines, buses, police etc can quickly move, but many of the roads in Highams Park</p>	<p>The Local Plan will be supported by an Infrastructure Delivery Plan, which will set out details of the borough's infrastructure requirements. This document will set out what is needed,</p>

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			(The Avenue) are often blocked up so that further developments must be proportionate to the infrastructure.	where it is needed and when it is needed. This document will be published with the final version of the plan.
550	Wendy Holloway		Challenges in the Highams Park area include the gradual increase in crime, particularly related to drug dealing.	This point is noted.
555	D Kendall		Key Challenges Lack of commuter parking at Chingford station. Lack of stations at South Chingford and Highams Park Service to Central London not frequent enough at 15mins. Frequent maintenance closures (8 weekends in summer 2019) make North Chingford seem very cut off. Alternative Overground option to Stratford by reinstating Hall Farm Curve. Lack of bus services to other borough centres and beyond Length of time taken to get by bus to other borough centres as a result of traffic. Local lack of cultural facilities which are mainly in the south Lack of large local supermarkets resulting in car trips outside the borough Oversubscribed primary schools Lack of GP services and pharmacies Long GP waits No play facilities for young children in the Station Road /North Chingford Area. Closure of College Gardens Nursery School and transfer of nursery places further away from the Station road /North Chingford area. Being considered affluent and vibrant by Council resulting in long term (decades) under-investment. Too many restaurants in Station Road attracting non-locals. Nearest general hospital is difficult and complicated to get to.	The Council has commissioned a Transport Study to review current road performance. The Council will continue to work in partnership with TfL in developing appropriate sustainable transport policies that will assist in improving Waltham Forest's bus and rail network. In addition, the Local Plan will be accompanied by an up to date Infrastructure Delivery Plan when it is published for consultation in 2020. The IDP will outline the need for schools and health services and how such needed will be met through development.
556	Emma Finnigan		I'm very, very concerned that building 450 additional homes in close proximity to the station will irretrievably ruin the area. It would change the character of Highams Park and it doesn't fit with the vision of the draft Local Plan which I know so many people have worked on for a long time.	The concern raised about the impact of growth on local character is recognised - in particular that new development could become inappropriate to the existing local context. The draft Local Plan contains a range of policies to guide growth and change and to ensure that new development is carried out in harmony with its setting and makes a positive contribution to the local environment. See Policy 5 (Approach to

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				Intensification) and Policy 62 (High Quality Design) and Policy 63 (Tall Buildings). Other policies also consider amenity and other issues relating to local character. All of these policies are considered in decision making, ensuring that an appropriate balance is maintained between competing objectives and that new development is sensitively designed.
557	Emma Finnigan		I'm very keen to support the development of cultural and leisure activities in the area, particularly by developing the Regal building as a cinema complex. It would be tremendously well used by local residents and also draw people in from other area of the borough. It would be a huge asset to the area.	Support noted.
558	Emma Finnigan		I am keen that our valuable Hale End Library is retained - it's used regularly by community groups and schools, and the residents of Highams Park feel absolutely passionately about the importance of it being here.	This comment is noted. The plan seeks to protect social infrastructure uses including libraries and meeting halls (See Policy 55).
559	Emma Finnigan		I feel strongly that such intense housing development, however, within such close proximity to the centre of Highams Park will bring about huge changes in character and de-personalise rather than increase the vibrancy of the existing community.	The concern raised about the impact of growth on local character is recognised - in particular that new development could become inappropriate to the existing local context. The draft Local Plan contains a range of policies to guide growth and change and to ensure that new development is carried out in harmony with its setting and makes a positive contribution to the local environment. See Policy 5 (Approach to Intensification) and Policy 62 (High Quality Design) and Policy 63 (Tall Buildings). Other policies also consider amenity and other issues relating to local character. All of these policies are considered in decision making, ensuring that an appropriate balance is maintained between competing objectives and that new development is sensitively designed.
560	Mrs Barbara Chapman		The proposals will destroy much of which the local residents, through the HPPG, have worked hard to deliver. e.g. A community spirit and a very pleasant environment akin to living in a village.	The Council recognises the supporting role of neighbourhood plans such as that being prepared by the Highams Park Planning Group. The Council has declared its commitment to work with

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				the Highams Park Planning Group to ensure a good relationship between both plans.
565	Mrs Barbara Chapman		We very much doubt that the residencies you are proposing to build will be affordable to local residents. (How will this help the really needy... the homeless?). Also the height of the proposed buildings is questionable.	The plan seeks to provide a broad range of housing choice by size and tenure including affordable housing and cater for people with special housing needs. See Policy 24 (Delivering genuinely affordable housing). The draft Local Plan contains a range of policies to guide growth and change and to ensure that new development is carried out in harmony with its setting and makes a positive contribution to the local environment. See Policy 5 (Approach to Intensification) and Policy 62 (High Quality Design) and Policy 63 (Tall Buildings). Other policies also consider amenity and other issues relating to local character. All of these policies are considered in decision making, ensuring that an appropriate balance is maintained between competing objectives and that new development is sensitively designed.
566	Mrs Barbara Chapman		Highams Park and Hale End fought tirelessly to keep it's public library. Now you plan to destroy it. LBWF thrust upon us Mini Holland, The Borough of Culture, and Chingfest, all of which were a waste of OUR money. We feel we are living in a dictatorship.	The Local Plan does not allocate sites as this will be the subject of a Sites Allocation document which will be consulted in 2020. The library is not affected by either document.
567	Mr David Smith		Highams Park is not a 'retail centre' - its shops are fairly bespoke, and mostly food based. Should be reclassified.	Highams Park is designated as a District Centre as defined in the current Local Plan (DC3). The proposal in the draft Local Plan makes no change in this regard.
568	Mr David Smith		Hale End Library - this beautiful building and public area does not deserve to be bulldozed, please leave it be.	The Local Plan does not allocate sites as this will be the subject of a Sites Allocation document which will be consulted in Autumn 2020. The library is not affected by either document.
577	Mr David Smith		The existing station building is key to the "village" character of Highams Park District Centre and, as such, is much valued by many people living here.	The Local Plan does not allocate sites as this will be the subject of a Sites Allocation document which will be consulted in 2020. The station is not affected by either document.

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580	Mr Len Banister		Highams Park is generally rundown, its most important feature is the Regal Cinema, which has been an eyesore for years. The centre needs to be smartened, some shop frontages have been improved, but new pavements are already breaking up. There is also a dominance of fast food outlets and shuttered shops.	This comment is noted. The Council is committed to working with the Highams Park Planning Group and other stakeholders to ensure the delivery of the Regal Cinema.
587	Mrs Sheree Mear		I have a number of serious concerns regarding the plan, including Highams Park being identified as one of the areas for intensification with a huge minimum target for additional homes within 800 metres of Highams Park Town Centre. The targets are way too high and will have a huge negative impact on the area. These targets do not even align with the vision of the draft plan which is to retain the local character of different areas. To accommodate this level of development would potentially require demolition and redevelopment of existing buildings (possibly the Library, the station and some of the shopping parades in the town centre) and infill developments throughout the area. Development on such a scale would be a disaster for Highams Park and damage the character of Highams Park irreparably. Delivery of housing targets should never be achieved in such a way as to only provide minimum standards, and developments should not be 'squeezed in' which, in respect of Highams Park would adversely affect the character of the whole area to the detriment of existing residents and new residents.	The Local Plan contains strong commitments to maintaining local character and does not allocate sites. This will be the subject of a Sites Allocation document which will be consulted in 2020. Neither the station nor the library is affected by either document.
589	Mrs Sheree Mear		I do not support redevelopment of the Highams Park Overground station building or the car park/access road to the station adjacent to The Avenue. The station is pivotal to the village nature of Highams Park. Hale End Library must also be retained and protected. Shops should not be allowed to have ground floor residential accommodation with respect to any change of use applications and the development of James Yard	These comments are noted. The Local Plan contains strong commitments to maintaining local character and does not allocate sites. This will be the subject of a Sites Allocation document which will be consulted in 2020. Neither the station nor the library is affected by either document.

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			should be conditional on single level access from the station to Larkshall Road adjacent to the level crossing.	
616	Gordon Turpin	Highams Park Planning Group	References to housing targets are potentially misleading for many consultees who will most likely focus on their own specific areas when reviewing the documents. The monitoring target is set at 4,000 dwellings, which is 74% higher than the 2,300 homes identified for the North Waltham Forest Strategic Area. Delivery of housing targets should not be delivered in such a way that they only provide minimum standards as this is to the detriment of the area and its residents. Land optimisation needs to take into consideration the existing historic context and aesthetic of the area. Highams Park Station should be designated as a "gateway to the forest" in alignment with Chingford Station.	These comments are noted. The Council notes the error in the growth figures stated. This will be corrected.
622	Gordon Turpin	Highams Park Planning Group	The Highams Park Planning Group supports the contraction of the designated primary frontages in Highams Park District Centre. However, it is not a comparison retail centre and will be better served by policies articulated in the HP Plan. The primary frontages should be contiguous and include the Tesco frontage to Larkshall Road.	This point is noted for further consideration. It is proposed to review the designated frontages, also defining the limits of the Primary Shopping Area as proposed under Policy 20 (Highams Park Strategic Location) and Policy 50 (Managing Changes of Use in Primary Shopping Areas).
776	Councillor Alan Siggers	Councillor	Have any specific discussions taking place between the council and Enfield council regarding the strategic location surrounding the North Circular?	The Council has a legal duty to cooperate with neighbouring Local Planning authorities on cross boundary matters. Accordingly, duty to cooperate meetings have been held with LB Enfield to discuss the plan proposals.
864	Mr Roger Brown	Chair, Love North Chingford	Recent retail decline: adverse changes in retailing, a lack of support by the Council through the Local Plan has left North Chingford District centre in poor shape, and urgently needs upgrading so that the retail centre re-establishes its links with the community, and encourages it to spend its money locally. For instance the Direction of Travel Document P47 states: "We have delivered a borough wide programme of shop front	Consultation on the Direction of Travel closed in December 2017. It is not clear if this comment refers to the current Local Plan Policies 18.5, 47, 49, 50 as these are not referenced.

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			improvements across our Town Centres and High Streets.” Nothing has been done here!	
866	Mr Roger Brown	Chair Love North Chingford	Residents have no enthusiasm to be more ‘metropolitan’- whatever that means! North Chingford is a low rise, low density outer suburb adjacent to the internationally important open space of Epping Forest. Other meaningless terms such as being more ‘vibrant’ are dotted through the text, substituting for real objectives.	This comment is noted. The objectives are set out in Policies 17 and 18.
868	Alice Roberts	Campaign to Protect Rural England (CPRE)	We are concerned that the Green Belt review is looking at protected areas of ‘brownfield’ or industrial land. Having ourselves reviewed Green Belt and MOL sites along the North Circular and at Lea Bridge we cannot see that there are any which are not vitally important in terms of the five NPPF criteria and London Plan policy.	Regarding the release of Green Belt sites, this point is noted for careful consideration - mindful of the strategic policy requirements of the London Plan, the findings of the Council’s evidence base on Green Belt/MOL and the need to demonstrate exceptional circumstances.
884	Lauren Keeling	Planning Officer Essex County Council	ECC also notes that this part of the Draft Local Plan includes no references to the sensitivity of the Forest, as a designated Special Areas of Conservation (SAC), to existing and future growth. It is noted and, in this respect, welcomed, that the spatial strategy allocates the smallest share of the borough’s planned growth to its northern third. However, the Draft Local Plan does not acknowledge the identified need to plan and carefully manage growth that affects the forest, with the potential to result in adverse impacts on the integrity of the SAC. The northern part of LBWF will fall within the zone of influence of the SAC (this zone of influence may also be enlarged in future). Accordingly, it will be necessary for growth within such locations to consider impacts on the forest, in relation to both air quality and visitor recreational impacts. Mitigation measures are likely to be required in line with an emerging Appropriate Assessment and mitigation strategy being led and developed by Epping Forest District Council.	As a competent authority, the Council is an actively engaged with Natural England, the City of London Conservators, Epping Forest Council and other EFSAC stakeholders in formulating an appropriate framework for mitigating recreational and other impacts on the Forest. Further work is presently being carried out in this direction.

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885	Lauren Keeling	Planning Officer, Essex County Council	ECC notes that the vision recognises its role at the gateway to Epping Forest, but fails to appropriately ensure that the future connectivity to Epping Forest is delivered. It is appreciated that Paragraph 7.4 refers to the London Overground, however, the Draft Local Plan acknowledges that the northern part of Waltham Forest is less accessible. ECC would welcome working with the LBWF to ensure that appropriate connectivity is delivered within through the emerging Local Plan.	This comment is noted - as part of Duty to Co-operate discussions.
886	Lauren Keeling	Planning Officer Essex County Council	ECC notes and welcomes that Policy 17 bullet (e) states “encouraging an improved cycle and pedestrian network across the North of the Borough, and findings new linkages and connections for walking and cycling to Epping Forest and Lea Valley Regional Park. ECC acknowledged that this policy provision seeks to ensure that there are walking and cycling links extending out of LBWF and into the neighbouring Essex authority of Epping Forest District Council. This link is supported.	Support for the policy is noted.
920	Mr Mathew Frith		Para 7.7: We support measures to further strengthen the green assets and character of this part of the borough, not just internationally important but also the eastern fringes of the Lee Valley.	Support is welcomed.
921	Mr Mathew Frith		We welcome and support this.	Support is welcomed and this comment is noted for further discussion.
922	Mr Mathew Frith		Parts E and F: We support these.	Support is welcomed.
977	The City of London	The Conservator's of Epping Forest	The Vision for the North of the Borough (page 55) refers to Epping Forest as being to the North of the area when in reality the entire east of the borough is bounded by Epping Forest sites from Bush Wood; Leyton Flats; Canada Plain; Gilberts Slade; Walthamstow Forest, The Sale and Highams Park.	This comment is noted, and this will be corrected in the next version of the Local Plan.

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1008	Lauren Laviniere		Policies 18, 19 and 20 - these do not seem to be very spatially distinctive given that the centres are very different places with different development opportunities. Is there evidence base to inform these policies or a way to better communicate the distinctive opportunities (such as an inset map). It would also be helpful to point to the reference(s) and evidence base which pick up on the place making principles that should be considered i.e. are there character or design studies that look at what makes different areas locally distinctive	This comment is noted. The need for a spatially distinctive policy approach is recognised. It is proposed to clarify this point in the next iteration of the Plan. The Local Plan is informed by the Characterisation and Intensification Study 2019 evidence base document. This can be found in the Local Plan Evidence base section of the Council's website.
1066	Ms Alison Blom-Cooper	Planning Department, Epping Forest District Council	Vision for the North of the Borough (page 55). There is no reference to ensuring that there is no adverse effect on the site integrity of the EFSAC, this should be included.	This will be referenced more comprehensively in the Regulation 19 iteration of the Local Plan.
1069	Ms Alison Blom-Cooper	Planning Department, Epping Forest District Council	The diagram on page 56 – of the Northern Area should include reference to the EFSAC.	This comment is noted for clearer mapping.
1070	Ms Alison Blom-Cooper	Planning Department, Epping Forest District Council	Policy 17 North Waltham Forest (E) and Policy 18 North Chingford Strategic Location (6): see previous comments regarding improving walking and cycling connectivity.	This comment is noted. Connectivity issues will be addressed via the Council's Green and Blue Infrastructure Study as the plan progresses.
1169	Blackrock and NEAT Development		As noted above we are broadly supportive of the Council's approach to managing growth through the establishment of three spatial sub-areas and focused strategic locations within each. As such we broadly support the New Local Plan's approach to growth in North Waltham Forest and wish to make no further comments on the policies contained within Chapter 7 of the New Local Plan at this time. However, we reserve the right to make comments on the chapter and policies included	This comment is noted.

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			within at a later stage in the New Local Plan preparation process.	
1171	Neeru Kareer	Enfield Council	Waltham Forest's draft Local Plan document contains the spatial approach and direction in which key policies and strategic objectives are set out to 2035. Predominantly, the northern area of Waltham Forest sits close to the boundary with Enfield, meeting the flagship Meridian Water development. Enfield welcomes opportunities in creating linkages to Meridian Water which would enable the flow of positive regenerative impact across the north of Waltham Forest, as stated in the Waltham Forest's draft Local Plan.	Noted.
1174	Neeru Kareer	Enfield Council	However, we need to ensure that the planning and delivery of sustainable transport and new housing along with provision of social infrastructure do not operate in isolation. Both Sewardstone Road and the adjacent area to the North Circular Corridor present opportunity for a coordinated approach to showcase, both areas potentially benefit from an improved transport access via links to the Meridian Water development and future Crossrail 2 stations in Enfield. The two activities of fostering and alignment between the implementing authorities responsible for transport and housing should work closely together in delivering their strategic objectives and organise their development sites better.	These comments are noted and will be carried forward into the next stage of the Local Plan.
1262	Alex Christopher		On Draft Policy 17 (North Waltham Forest) We are fully supportive of the importance given to the north of the borough as a priority area for "targeted and sensitive investment and growth focused in and around the three designated centres" with Highams Park being a named centre. Similarly the targeted growth under Part A of the policy for the delivery of a minimum of 3,500 new quality homes and 1950 new jobs across the North Area is supported. We consider that to ensure that these	Support noted and comment has been taking for consideration.

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			noted targets for both homes and jobs are achievable that the requirements under Part B of the draft policy, which include the intensification of SIL and BEA land, with co-location, must be fully supported to fully optimise the use of land in the most sustainable locations.	
1287	Josephine Vos	Transport for London - City Planning	This section states that proposals will be supported where they encourage an improved cycling and pedestrian network. It is not clear how a development proposal would 'encourage' improvements in infrastructure. We would suggest using a term such as 'support', 'facilitate' or 'deliver'. We would welcome a similar reference to public transport improvements, including bus services.	This comment is noted.
1445	Colin Setchfield	The Parish Church of Saint Edmund	The plan encourages cultural and leisure investment into the District Centres including Chingford Mount. Considering no element of the Borough of Culture programme has extended to Chingford Mount, would LBWF report on its own cultural and leisure investment in Chingford Mount District Centre recently, and comment in the light of that how others might be encouraged to do so?	Proposals for the development of new cultural and leisure uses will be considered as part of the preparation of masterplan proposals or town centre strategies for the identified strategic locations and town centres including South Chingford.
1501	Helen Monger	London Parks and Gardens Trust	LPGT welcomes the term "heritage, cultural and green assets" eg in Policies 6, 18, 19, 20, 21 and feel that this captures the spirit of good design. This term should be applied elsewhere in the plan to ensure all development meets this criteria.	Support noted.
1540	Mark Furnish	Sport England	Sport England supports that all the overriding policies for the various sub-areas of the borough requires proposals to contribute to the sporting assets of an area. Having regard to the extent of growth in each area, and associated increase in demand for sport facilities, it is important that the sporting infrastructure is enhanced where required otherwise there would be unmitigated increased strain on facilities. New/enhanced facilities advocated in the Draft Local Plan, such as the enhancements advocated in Policy 8 to Low Hall Sports	Support noted.

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			Ground, should address the key findings and reflect the actions of the emerging Playing Pitch Strategy. Sport England advises that these policies refer to this strategy, and any other sporting strategies, and express what is required to meet the emerging facility needs so that developers/applicants can be informed as to what sporting infrastructure is expected to support growth in the various areas.	
1543	Mark Furnish	Sport England	The policies also contain some aspects of Active Design, for example walking, cycling and public realm improvements, However, Sport England recommend that the policies incorporate all the principles and provided links to the Active Design guidance so that developers/applicants can be informed how to 'design in' activity into developments. Achieving well design active places would assist the Council in improving the health and well-being of residents and visitors.	It is proposed to include a reference in the Local Plan to the principles set out in the Sports England Active Design document.
1608	Bob Bennet		Is it realistic to expect there to be "major comparison retail developments etc" in the district centres listed.	An assessment of the need for retail floorspace during the plan period (up to 2035) has been undertaken as part of the Waltham Forest Retail & Town Centres Study 2019. This assessment indicates that, when current retail floorspace commitments are taken into account, there is no need to plan for an increase in retail floor space provision up to the period 2029. That said, the Plan encourages local development opportunities for retail and other main town centres uses in individual centres where justified by need and can support, maintain or enhance the overall health of a centre.
1814	Robert Tatam		Additional detail is also required before residents can comment on the potentially-worrying statement (number 7.7, in the section commencing on page 53) "Council is reviewing the integrity of the Green Belt boundaries in the local area with a view to de-designating brownfield land. I would be pleased to know the timetable for this review, and the opportunity to comment; the Green Belt boundaries have been eroded in	Noted, the Council has undertaken a Green Belt Review. The review has suggested minor amendments along the North Circular where land is no longer Green Belt. There is no attended Green Belt Release.

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			places in this part of London and in Essex, and any further changes may be detrimental.	
1847	Mike Chrimes		In particular there is constant reference to the impact of Crossrail 2, which is unlikely to be built in the period under consideration and this not an enabler, nor is there consideration of how local public transport or travel could benefit or alter from its construction.	It is accepted that Crossrail 2 is a long-term project. At this stage, information as published indicates that the final plans on this project will be submitted to Parliament in 2021/2022 and that Crossrail 2 is likely to be up and running by the early 2030s. As the 15-year plan period extends to the mid-2030s period, it is necessary to acknowledge this.
1858	Mike Chrimes		The general assumption that secondary retail centres may be allowed to die does not seem to be substantiated, certainly in the north of the borough where such centres seem to have a higher occupancy rate than the main centres as they do not have the national chains that are closing so rapidly. Recent reports suggest it is the large national retail chains that are under most pressure, a trend confirmed by events at Thomas Cook.	The plan sets out a network and hierarchy of centres. Policy 47 commits to ensuring their protection and enhancement to ensure a sustainable distribution of town centre facilities and services.
1971	Ms Rosa Ruggieri		The proposal mentions Green Belt area and protecting the Metropolitan Open Land but then proposes to build 3500 new quality homes; it really does not make sense.	The Local Plan proposes approaches to intensification within the existing urban fabric without extending into Green Belt or MOL. The Characterisation and Intensification Study 2019 which provides the principles for this approach can be found in the Planning Policy evidence base section of the Council's website.
1974	Ms Rosa Ruggieri		Please can someone explain what "Cultural Growth" "flourishing cultural" means. The borough, yes, needs to move forward, and areas need improving for the better, but what it does not need to do is pay a consultancy company million of pounds to introduce a plan; with words that they think people would like to read; ask the residents of the areas first and we could have explained what is required free of charge.	Culture for all Londoners is the Mayor's landmark strategy for culture. Culture and the creative industries contribute £52bn to London's economy every year and account for one in six jobs in the capital. The Local Plan plays a significant role in the delivery of the London Plan through asking residents to contribute to the planning process.
1989	Louise Croucher		Burgeoning for opportunities for housing, employment and cultural growth - we are actually totally fine as we are thank you and most have chosen to live there because of the density	National planning policy (NPPF) attaches great importance to Green Belts. However, in preparing local plans the national planning policy also requires Councils to ensure policies are

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			of people and the forest and green belt areas. To take this away removes most people's reason for living there in the first place. why is green belt put in place if the local council can 'review the integrity' of it !!	underpinned by relevant and up-to-date evidence. The Council has carried out a Green Belt/MOL for this purpose and will consider the case for de-designations of Green Belt/MOL land parcels where justified.
1990	Louise Croucher		Vibrant cultural and retail hubs for diverse cultural metropolitan suburbs - what does this mean? I am concerned that these kinds of comments are used to hide real visions and intentions and are purposely included to mislead which is worrying.	It is recognised that intensification could be associated with concerns about new development becoming inappropriate to their context and destroying much of what people see as valuable in their daily living environments. However, if well managed intensification could provide positive benefits to improve the quality of local environments. The plan contains a range of policies to guide the redevelopment of sites/areas whilst prioritising the protection of local character.
1991	Louise Croucher		3,500 NEW HOMES IS UTTERLY RIDICULOUS THAT RESIDENTS DON'T WANT, WE DON'T HAVE ENOUGH PARKING, SCHOOLS AND INFRASTRUCTURE AS IT IS.	The Local Plan will be accompanied by an up to date Infrastructure Delivery Plan when it is published for consultation in the summer of 2020. The IDP will outline the need for schools and health services and how such needed will be met through development.
2026	Peter Drew		The consultation refers to "the area" but what precise areas are you referring to? i.e. where in Highams Park?	It proposed to clarify the reference made to "the area" as included in the Plan document.
2064	Stonecrest Marble Ltd	Stonecrest Marble Ltd	Our client agrees with the Area Profile of North Waltham Forest as described at paragraphs 7.2 - 7.7 of the Draft Local Plan, which in summary confirms that the character of the north is generally suburban and lower density compared to the Central and South areas of the borough; and that the southern and western areas of North Waltham Forest (which includes our client's land) is defined by the North Circular, reservoirs, industrial land and out of town retail.	This comment is noted, and the agreement expressed is welcomed.
2065	Stonecrest Marble Ltd	Stonecrest Marble Ltd	Our client supports the intention of Policy 17 to deliver a minimum of 3,500 new homes and 1,950 new jobs across the North Waltham Forest priority area. Our client's site is identified within the Employment Land Study as a Key	The support expressed here is welcome. Regarding the soundness of Policy 17, There are no site allocations shown at this stage in the Local plan. We will be consulting on a Site Allocations document alongside the regulation 19 consultation

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			<p>Opportunity Area to deliver new and additional employment floorspace to meet future needs. 5.35 However, with regards to the Policy Map provided on Page 62 of the Draft Local Plan, the Map does not identify any specific allocations in order to deliver this policy. Accordingly, Policy 17 is not considered to be sound as the lack of specific allocations, and particularly with regards to the release of suitable sites from the Green Belt, will create uncertainty and would adversely impact delivery. 5.36 With regards criterion (b), as outlined earlier in this representation, our clients site lies adjacent to an existing SIL, and the allocation of our client's site for employment use would support the intensification of the existing SIL. We would therefore request that the next version of the draft Local Plan should allocate the site for commercial development and thus remove the site from the Green Belt. 5.37 With regards criterion (f), whilst we support, in principle, the appropriate protection of Green Belt land, for the reasons outlined in section 6 and within the Local Authorities existing evidence base, the site should be released from the Green Belt. The Council's own evidence base confirmed that the site's removal from the Green Belt, "would result in only limited harm to the remainder of the Green Belt by virtue of the fact that development in these locations would effectively be 'infill' and would be well contained by the landscape".</p>	<p>of the Local Plan in the summer of 2020. This stage of the Plan will include the conclusion of the 2019 Green Belt Review.</p>
2088	Mike Sparrow		<p>Chingford does not need to be made into a 'Gateway' whatever that means to you. It doesn't need to be reinvigorated. The shops down at this part of Chingford serve this area perfectly well, even though you state that they are under used. It's crazy to put these plans up just because you feel you should go beyond your housing targets. You should be defending Chingford to remain a more appealing part of the borough right on the edge of Epping Forest.</p>	<p>It is recognised that intensification could be associated with concerns about new development becoming inappropriate to their context and destroying much of what people see as valuable in their daily living environments. However, if well managed intensification could provide positive benefits to improve the quality of local environments. The plan contains a range of policies to guide the redevelopment of sites/areas whilst prioritising the protection of local character.</p>

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2089	Mike Sparrow		If you crowd Chingford up with even more buildings than it has now, with more residents, more cars, more workers and families etc., and do this without more land, better roads, more schools, more and bigger hospitals, dentists, GPs and other vital services, then you are creating a tinderbox which we have seen happen elsewhere. And if you did build it all, with all the roads etc., it will no longer be a lovely little town on the edge of the forest. It's awful to think that people vote you in for you to do with people's lives as you think fit. It does indeed feel political to me in that you would like to homogenise all the corners of this borough. Perhaps in the corners of council there are thoughts that why should the people of Chingford enjoy their town as it is, why not crowd them out and make long standing residents move out to the country, which will then allow you to house more people and then build more and more until Chingford no longer has its appeal and is just another urban blot on the landscape.	It is recognised that intensification could be associated with concerns about new development becoming inappropriate to their context. However, if well managed, intensification could provide positive benefits to improve the quality of local environments. The plan contains a range of policies to guide the redevelopment of sites/areas whilst also protecting local character.
2107	Mike Schirn		In particular I am concerned that there is a variance between policies 19-22 at 2,300 new homes and the declared target of 4,000 homes for North Waltham Forest.	The Council notes the error in the growth figures stated. This will be corrected.
2303	Mike Chrimes		station road Chingford and Highams park have good transport links for offices	This comment is noted.
2308	Mike Chrimes		The brief consultation document states 'The north of the borough is well served by public transport including buses and London Overground services.' Most residents would disagree, particularly those on the north east side. Bus services are unreliable in the rush hour and the hire levels of car dependency reflect poor public transport. This must be tackled if there are more general commitment to a healthier environment is not achievable.	The issues regarding transport are noted. The Council will continue to work in partnership with TfL in developing appropriate sustainable transport policies that will assist in improving Waltham Forest's bus and rail network.

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2382	Mike Chrimes		It would be interesting to know the possible impact of Brexit on the centres. What proportion of businesses in the 3 centres are run by EU/non EU citizens and are they thinking of moving from UK, what level of uncertainty is hanging over their business. How dependent are they on fellow 'immigrant' communities for their business?	Brexit is a process which will unfold over time and the impacts of which will most likely be apparent at the time that the Local Plan will be at its first post adoption review.
2387	Mike Chrimes		The cultural offering is limited and many involved actively in culture practice elsewhere, the Assembly Hall is under-utilised. The Vestry House and William Morris Gallery have stuff in store. Let's display it. More studio space would help.	This comment is noted for consideration.
2395	Mike Chrimes		Mention is made of cycling but access to Enfield is difficult to all but experienced cyclists, and parking in cycling lanes generally makes them all but hopeless. Some improvements have been made, but a safe leisure route to the Forest is elusive. Joint use of the paths beside the church and library would help.	This comment with reference to the Council's recently commissioned Green and Blue Infrastructure Study.
2398	Mike Chrimes		The connectivity with the Lea Valley Line needs reworking. Latest news on Crossrail 2 suggests it will not start for some time as money earmarked for the more urgent projects, as well as Crossrail 2 is being diverted to the completion of Crossrail1/The Elizabeth Line. Moreover public transport links to Ponders End are severely constrained by congestion on the road between the reservoirs, with no effective cycle path either. However, for residents in south west Chingford (and north west Walthamstow) improvements to public transport and cycle links to Meridian Water would offer benefits - as might car parking there.	These comments are noted in the light of the longer-term nature of the Local Plan aspirations for the Sewardstone Road Strategic Location.
2399	Mike Chrimes		The existing opportunity sites are a disparate group, and it is unclear who the freeholders are and whether the owners' businesses and residents involved would provide an easy win or protracted negotiations. There might be other sites more amenable to development.	These comments are noted. However, site allocations will be progressed via a separate development plan document which will be out for public consultation in 2020.

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2409	Mr Roger Brown	Chair, Love North Chingford	We ask for a down to earth, evidence based description in the plan, and in particular in policy 18, eliminating pointless terms such as 'vibrant' 'metropolitan' and the like from the preamble, and concentrating on the unique needs of our town centre (we take no view of the wider areas). In particular the unique retention and enhancement of our village atmosphere, the Edwardian feel of Station Road and the sit down food offer should be mentioned.	These comments are noted. The development principles in Policy 18 do not include the words referenced here. Policy 18 makes specific reference to the protection of the Conservation Area and applying development principles in accordance with the character and local distinctives of North Chingford.
2425	Jack Andrews		I was born in Walthamstow in 1931 and I have been a resident of Highams Park for the last 55 years. Having seen the borough plan which the Council have circulated, I am appalled by the changes being proposed and the damage that these proposals may do to this borough. I have found difficulty in locating a straightforward method of communicating my views as there does not seem to be an email address to which such views should be sent - no doubt this will reduce the number of objections! As a council tax payer, I expect Waltham Forest to be providing schools, libraries, public toilets, road maintenance and other public services. Waltham Forest either is neglecting or closing these facilities but instead is initiating the erection of blocks of flats in every small space which either becomes vacant or can be acquired, destroying the erstwhile nature of the borough. This policy is also destroying the whole character of the borough, is ignoring the need for those who have been born in the borough to be prioritised for social housing, is increasing the already overcrowding in the borough and is making difficulties for local residents to object to these changes. The total character of Highams Park and Chingford will be changed by intensive development in these areas. The latest Council building plans do not provide spaces for resident parking; local parking spaces at Walthamstow Central and Blackhorse Road stations are being built on. It is not long ago that we were being	It is recognised that intensification could be associated with concerns about new development becoming inappropriate to their context and destroying much of what people see as valuable in their daily living environments. However, if well managed, intensification could provide positive benefits to improve the quality of local environments. The Local Plan reflects the Council's commitment to TfL's Healthy Streets principles and the Mayor's Transport Strategy to provide low traffic liveable neighbourhoods. The Council is committed to the reduction of private car use in the lifetime of this Local Plan. Policy 72 sets out the thresholds for car parking in the borough in line with the Intent to Publish London Plan 2019 which includes the contributions that future development may make in the extension of parking controls in the borough.

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			encouraged to bring our vehicles to the stations for parking rather than take them further into central London; what happened to these suggestions? At present housing blocks for example being built at Hoe Street station and on South Grove are so close together that many residents will not enjoy sunlight at all. Is this the future of our borough? Unfortunately, although many people object to vehicles being abandoned outside their premises, cars are here to stay and restricting the spaces available and charging local residents for parking outside their premises merely exacerbates the problem. Is this the future for this borough? I sincerely hope not. Too many of my friends and neighbours have moved out in recent years for a better life but I would hope that it might still be possible to arrest this trend and to keep the borough a place where people will want to live in future. I am opposed to these plans and should like to register my objections in the current consultation please.	
2534	Save our Suburbs Petition - supported by 662 signatures	Chingford & Woodford Green Conservatives	Include height limits on development in North Chingford, South Chingford and Highams Park which respect the local, suburban character.	The Strategic Location Policy for Highams Park aims to build on the character of the area and aims to enhance and support it. The design and heritage policies in the Local Plan also have a strong focus on enhancing and retaining character.
2597	Andrew Sivyer		Traffic congestion station Road/Ridgeway Junction.	Chapter 15 carries forward the Mayor's Transport Strategy and the Council's 2020 Vision for Transport Policy 67 focusses attention on reducing private car usage and promoting public transport, walking and cycling. These measures are hoped to reduce traffic congestion and reduce pollution. The transport policies also encourage the use of electric vehicles.
2598	Mr. David Matson		Traffic congestion and pollution.	The Mayor's Transport Strategy and the Council's 2020 Vision for Transport has focused attention on reducing private car usage and promoting public transport, walking and cycling. These measures are hoped to reduce traffic congestion and

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				reduce pollution. The transport policies also encourage the use of electric vehicles.
2599	Mike Chrimes		Better night-time economy.	The Council supports evening and night-time economy use as set out in the Distinctive Town Centres and High Street section of the Local Plan in Policy 53. We will consider how best to support this with our regeneration, culture and business teams in North Chingford.
2600	ms elisabeth flint		Achievement of minimum growth targets of 450 new homes; This is out of proportion to the rest of the North Chingford area and the space does not support this development. It is boundaries by the reservoirs and forest and the road/transport infrastructure can not handle this increased flow of traffic.	Local Plan must be in general conformity with the London Plan. The London Plan sets a housing target for the whole borough and the Council has proportioned it in relation to where housing could come forward in the future. The London Plan and the NPPF also required to make best use of land which means considering sites such as box retail or car dealerships. The Council understands accessibility challenges in this area of the borough and is considering how best to improve it, including how links could be improved to Chingford Station and Ponders End and Meridian Water in Enfield.
2601	ms elisabeth flint		Focusing new development to the area of Kings Head Hill/Sewardstone Road junction; - this area is typified by three-storey houses and flats. anything higher than that would be detrimental to the atmosphere and character of the area. This is a semi rural area, many residents have chosen to live in this area because of that and the easy access to the forest. There are many visitors to the area to enjoy the rural nature - coming from the station, by car and cycling. Overdevelopment of the junction of Sewardstone Road and Kings Head Hill would mar this impression.	Local Plan must be in general conformity with the London Plan. The London Plan sets a housing target for the whole borough and the Council has proportioned it in relation to where housing could come forward in the future. The London Plan and the NPPF also required to make best use of land which means considering sites such as box retail or car dealerships. The design and heritage policies in the Local Plan also have a strong focus on enhancing and retaining character. The environmental policies set out in the Local Plan have a strong emphasis on protecting and enhancing green spaces including Epping Forest.
2602	ms elisabeth flint		Expanding the boundary of Sewardstone Road Neighbourhood Centre; The green areas are an important resource for the local population.	The environmental policies set out in the Local Plan have a strong emphasis on protecting and enhancing green spaces including Epping Forest.

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2603	Ms Elisabeth Flint		Improving public realm and public spaces across the area and walking and cycling accessibility, connectivity, permeability and legibility to Ponders End, North Chingford District Centre and South Chingford / Chingford Mount, as well as other identified routes. The roads are already congested - with little opportunity for improvement, any encouragement for this area to become an entry point for North Chingford - as opposed to NCR - or Epping Road - would cause major disruption for the local population.	The Mayor's Transport Strategy and the Council's 2020 Vision for Transport has focused attention on reducing private car usage and promoting public transport, walking and cycling. The aim of these policies is to reduce road traffic and potential for congestion.
2604	Ms Elisabeth Flint		Apply place-making principles that reflect the character and local distinctiveness of the area, particularly taking advantage of the heritage, cultural and green assets. Hopefully this means maintaining the semi-rural nature of the Sewardstone area and the views from the pole hill attraction. These are definite distinctive local features, as well as avoiding turning Kings Head Hill, Sewardstone Road and Waltham Way into a car park during rush hours and lunchtimes.	Noted. The strategic location policy for Sewardstone Road will be updated to take into account local attractions such as Pole Hill and Epping Forest. The design and heritage policies in the Local Plan also have a strong focus on enhancing and retaining character.
2605	Ms Elisabeth Flint		Improvement to sense of arrival at Sewardstone Road, as a gateway into the borough. This is ok - dev of shopping parade is welcomed, but not to detriment of local 'feel' - DEFINITELY high rise - above three stories - would be out of place, inappropriate and lead to unravelling of the social cohesion of the area.	Noted. The design and heritage policies in the Local Plan also have a strong focus on enhancing and retaining character of the borough and development brought forward will be expected to deliver against these policies.
2622	Mrs Caroline Murray		I don't think enhancing cycling will improve the area as the current enhancements aren't being used by the majority of cyclists in the area.	The Council is committed to the promotion of active and sustainable modes of travel in line with the Mayor of London's transport strategy.
2623	Mrs Caroline Murray		I would like to see the high street targeted as there are many empty shops and it feels like the high street in North Chingford is dying a death.	The Local Plan is informed by an up to date assessment of retail need in the Waltham Forest Retail and Town Centres Study 2019. Policies 48, 49, 50 and 51 set out how the Council intends to promote the regeneration of retail in the borough's district centres.

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2624	Mrs Caroline Murray		I would also like to see the green fenced in with a low fence to keep the children who use it safer from the road and also more benches. There is also quite a lot of anti-social behaviour around the Green with drinkers throughout the day.	The Council is committed to ensuring that public spaces are safe and accessible for all. Where public spaces are misused, this would be a civil enforcement matter outwith the scope of the Local Plan.
2635	Scaife		South Chingford is in decline with poverty, drugs and violence the norm.	Chapter 7 of the Local Plan sets out policy interventions in policy 19 intended to promote the regeneration of the South Chingford/Chingford Mount Strategic Location.
2637	Mr Dominic Eaves		Parking is a big challenge in the area, and so it is very important that new developments are realistic about the demands of parking for new houses / flats. The tendency in recent years has been to deliver insufficient (or too expensive) parking leading to very acute overflow in the few remaining non-resident permit roads in the area, such as on my road Nelson Road. This is a daily source of extreme frustration and aggravation between residents and visitors to the area. I would strongly recommend any further developments should trigger deployment of resident permits in all the nearby residential roads.	The Local Plan reflects the Council's commitment to TfL's Healthy Streets principles and the Mayor's Transport Strategy to provide low traffic liveable neighbourhoods. Comments in relation to parking issues are noted and the Council is committed to the reduction of private car use in the lifetime of this Local Plan. Policy 72 sets out the thresholds for car parking in the borough in line with the Intent to Publish London Plan 2019 which includes the contributions that future development may make in the extension of parking controls in the borough.
2660	Mrs Andrea Boyle		My second is that there is very little detail just broad brush strokes which mean very little currently. I would love to see a vibrant diverse community with thriving businesses, equal use for cars, bike lanes away from the roads and a decent train service. I have concerns primarily due to vast overcrowding on the local train service. We already have a bun fight after Highams Park on a daily basis as there are now so many people trying to access the train at peak times and it is already full. New flats do not seem to be built with any parking provision - cars will not go away we need them! - and this will put added pressure on parking for existing residents. We have consistently voted against resident parking permits and this seems to be the end goal as an additional revenue source. "New development will contain a diverse mix of new homes featuring improved public realm, enhanced walking and cycle access and legibility	The Local Plan reflects the Council's commitment to TfL's Healthy Streets principles and the Mayor's Transport Strategy to provide low traffic liveable neighbourhoods. Comments in relation to parking issues are noted and the Council is committed to the reduction of private car use in the lifetime of this Local Plan. Policy 72 sets out the thresholds for car parking in the borough in line with the Intent to Publish London Plan 2019 which includes the contributions that future development may make in the extension of parking controls in the borough.

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			and connectivity. The area will feature new workspace, transport and social infrastructure and reconfigured town centre uses under the umbrella of a flourishing cultural offer for the local community and visitors." Please do not tell me that you are thinking of cutting off the road links. My elderly neighbours rely on car trips so walking and cycle access is no good, and our lack of local shops mean we have to drive to large supermarkets.	
2661	Mrs Andrea Boyle		To achieve this, the Council is reviewing the integrity of the Green Belt boundaries in the local area - What does this mean exactly?	The Council has undertaken a review of a number of small land parcels to ensure the boundaries meet Green Belt purposes as defined in the NPPF.
2662	Mrs Andrea Boyle		The schools are full and the doctors can't cope - with an appointment taking up to two weeks! There are only two surgeries anywhere near North Chingford. My road is culturally rich full of really lovely neighbours old and young we struggle with amenities, never have our road swept, my parents road has a school in it and is full of potholes and rutts. It is a less dense area because of the location, near the forest and our local businesses seem to be moving out. Compare this with Loughton or Epping, equally suburban and lower density and yet thriving with business and opportunity.	The Local Plan will be supported by an up to date Infrastructure Delivery Plan in line with the requirements of the NPPF (2019) and the Intent to Publish London Plan 2019. This document provides a framework for how the requisite infrastructure will be funded and located in order to deliver the growth required in the Local Plan.
2663	Mrs Andrea Boyle		There are a lot of words in this "plan" without much clear explanation of what this entails and is really planned? Your taller buildings policy is at odds with the plans to build over the bus station and station. Your description - "The area is characterised by semi-detached houses and terraces with some larger detached properties. These are generally a mix of inter-war, Victorian and Edwardian homes often on larger plots including front and rear gardens." is at odds with the vague description of what is planned for homes - "New development will contain a diverse mix of new homes." Surely new homes	<p>The comment is noted and the Characterisation and Intensification Study is online at https://walthamforest.gov.uk/sites/default/files/LBWF%20Character%20and%20Intensification%20Study%2C%02019.pdf</p> <p>This document sets out the principles to be considered in relation to area character assessment.</p>

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			should be in keeping with the surrounding area but ecologically sound?	
2664	Mrs Andrea Boyle		In order to make the community a "more thriving network of culturally rich and distinctive town centres integrating both existing and new liveable neighbourhoods" you need to ensure shops, schools and medical centres are available. The shops are closing down or are just nail bars and estate agents, due to the staggeringly high rates charged.	Chapter 11 of the Local Plan sets out how the Council will seek to protect and enhance the business and retail environment in compact areas of the borough's centres.
2665	Mr David Matson		Character and Local Distinctiveness (Policy 19, section 7): Policy 19 requires the application of: "place-making principles that reflect the character and local distinctiveness of North Chingford, particularly taking advantage of the heritage, cultural and green assets". This raises the question how "the character and local distinctiveness of North Chingford" is defined, and where. I understand (from the drop-in session) that there is a character study completed and due for release in the consultation period. I suggest consultation without the character study is incomplete and invalid, because the character study will help define permissible development, and inform residents of the context for future decision making. Consultation without the early release of the "character study" is incomplete, and invalid. Please release the character study as soon as possible - to enable fuller comment.	The comment is noted and the Characterisation and intensification Study is online at https://walthamforest.gov.uk/sites/default/files/LBWF%20Character%20and%20Intensification%20Study%2C%02019.pdf This document sets out the principles to be considered in relation to area character assessment.
2666	Mr David Matson		Sewardstone Road/North Circular Corridor (Policies 22 and 23): These two areas are intended to provide 1350 housing units. Development is clearly associated with the development of Crossrail 2. Without Crossrail 2, these areas will remain peripheral, less able to justify development. Crossrail 2 is currently programmed to be operational in the 2030s. It has yet to receive planning permission, a process to take place in 2021-2023. Funding is yet to be agreed, and Crossrail 1 has	The comments are noted in relation to the Council's longer-term ambition for development in these areas. The Council is aware of the issues identified in relation to Crossrail. The Council considers, however, that the scheme offers significant future potential in combination with the development in Enfield of Meridian Water. Given the long-term nature of development across a number of authorities the Council is aware that a suite of further work is required to refine the plan in this regard.

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			undergone delays following initial construction that now total 2 years and more. The Local Plan fails to spell out these timing issues, or to set out the circumstances in which it would sanction the construction of larger buildings to accommodate its housing objectives. These locations are not equivalent to those found at Blackhorse Road station or Lea Bridge station where immediate proximity to a major transport facility enables development. The uncertainty of the building of Crossrail 2 in the plan period may have consequences for the LBWF housing target of 1800 per annum, and a search for alternative housing development sites within the borough. More definition is required.	
2667	Mr David Matson		A reference to a document yet to be published - the Area Investment Plan - is inadequate for current consultation when residents require as much relevant information as possible. Consultation without the early release of the Area Investment Plan is incomplete, and invalid. Please release the Area Investment Plan as soon as possible - to enable fuller comment.	The Area Investment Plan is a discussion document that does not form part of the Local Plan.
2668	Alison Brand		Station Road, our main shopping area, is very busy during peak periods already.	This comment is noted.
2669	Rachel Thomas		Use a more proactive approach to litter-enforcement, antisocial behaviour.	This comment is noted. Enforcement is an operational rather than strategic service of the Council.
2670	Rachel Thomas		Focus on 'green issues' i.e. trees,	Chapters 17 and 18 deal with environmental protection and climate change.
2671	Rachel Thomas		Provide incentives for small business	This comment is noted for further consideration.

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2674	Miss Anna Misterska		I also think that the area would benefit from more greenery along the A406 North Circular - there is a lot of houses in close proximity to this busy road. Planting more trees or building sound-proofing walls would make that area more inviting and in character with HP.	The Local Plan (and the Highams Park Neighbourhood Plan) contain policies intended to promote urban greening and biodiversity.
2675	Miss Anna Misterska		I also think that the area would benefit from more greenery along the A406 North Circular - there is a lot of houses in close proximity to this busy road. Planting more trees or building sound-proofing walls would make that area more inviting and in character with HP.	The Local Plan (and the Highams Park Neighbourhood Plan) contain policies intended to promote urban greening and biodiversity.
2676	Miss Anna Misterska		I support opening of new cafes, restaurants, shops and entertainment venues.	This comment is noted.
2677	Miss Anna Misterska		I support building of new homes - especially under the Help to Buy scheme for prospective first time buyers.	This comment is noted.
2692	Mr David Crossman		These proposals totally ignore the fact that if you develop areas you have to improve the local infrastructure too. A current and long term problem in North Chingford is PARKING. If you want to bring more people into the area this means more cars. AND YOU WANT TO BUILD ON ALL THE CAR PARKS AND THE BUS STATION. PARKING PARKING PARKING is a problem. Totally ignored by your plan and will be compounded by any future development.	The Local Plan reflects the Council's commitment to TfL's Healthy Streets principles and the Mayor's Transport Strategy to provide low traffic neighbourhoods promoting public transport, walking and cycling and reduced car usage.
2693	Mr David Crossman		The proposals are vague at best in this document. However, the proposed developments for the bus station etc and the assembly halls are not an improvement in any way for North Chingford. Trashing an area in order to fulfil some misguided housing policy is not development or progress. Before you try building lots of houses, the council and the Mayor of London should first ban short term holiday letting of properties which would free up housing for long term renting. People are using	The Local Plan is a strategic plan for the whole of the borough that sets out the measures that the Council intends to promote to achieve conformity with the London Plan and the NPPF. A Site Allocations document which deals more particularly with specific sites will be consulted upon in 2020. The Local Plan does not allocate sites.

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			these letting sites to almost permanently short rent properties and avoiding registering the properties with the council.	
2697	Mrs Caroline Hankey		Rental rates for the Hall should be reviewed to make it more accessible and therefore of more use to the community, instead of pricing out local clubs/associations/family weddings etc.	The operational management of the Assembly Hall (hiring costs) is outside the remit of the Local Plan. This point will be referred to the Council's Asset Management Team.
2698	Mrs Caroline Hankey		The village characteristics of North Chingford, the gateway to Epping Forest must be retained. A building height restriction of three stories should be imposed, in order to maintain the character of NC, and avoid blocking park views.	It is recognised that intensification could be associated with concerns about new development becoming inappropriate to their context. However, if well managed intensification could provide positive benefits to improve the quality of local environments. The plan sets out a well-managed approach. It contains a range of policies to guide the redevelopment of sites/areas whilst prioritising the protection of local character and green and open spaces.
2699	Mrs Caroline Hankey		Infrastructure in terms of buses, trains, provision of parking, schools and doctors' surgeries should be in place before new dwellings are filled with occupants.	Infrastructure such as schools and surgeries will be covered in an up-to-date Infrastructure Delivery Plan, which will accompany the plan at the next consultation in 2020. The issues regarding transport are noted. The Council will continue to work in partnership with TfL in developing appropriate sustainable transport policies that will assist in improving Waltham Forest's bus and rail network.
2700	Mrs Caroline Hankey		To support local retailers parking must be maintained and improved, as many residents have health and mobility issues and even without those issues families will not stop using their cars no matter how many bicycle lanes you provide. These in fact impede the bus services and cause bottlenecks.	The Local Plan accounts for The Mayors Transport Strategy and the Council's 2020 Vision for Transport, focussing attention on reducing private car usage and promoting public transport, walking and cycling. These measures are intended to reduce traffic congestion.
2702	Mr Nicholas Williams		The 'flyer' issued to residents states that Chingford station has been identified as a significant transport hub. There is no reference whatsoever to improvements to the station being planned, in contrast to that being explicitly referenced for Highams Park station in the same document. Access from Chingford station is woefully inadequate at peak times, and this	The issues regarding transport are noted. The Council will continue to work in partnership with TfL in developing appropriate sustainable transport policies that will assist in improving Waltham Forest's bus and rail network.

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			will only deteriorate if no access improvements are made, especially if the council vision is to increase the amount of people living & working in the area (& thus travelling to/from Chingford).	
2703	Mr Nicholas Williams		I strongly believe that local infrastructure (including school places, medical resources, road use) must be improved or be in place BEFORE the 'sensitive intensification' is implemented. The council should clearly publish: 1) What estimates the council has used in terms of what housing to develop, i.e. number of 1-bed flats, 3-4 bed houses etc, as this will have a direct impact on the increased headcount in the area, car/transport use etc, that the local infrastructure must support. 2) Details of where the perceived demand for housing is coming from- is it a case of people moving into the borough, or from within. 3) Whether new developments will be 'affordable' &/or made available to 'essential' residents (NHS, emergency services etc), or sold at market rates (which will price many individuals out of the market & likely increase the volume of landlord-owned properties)?	Infrastructure will be covered in an up-to-date Infrastructure Delivery Plan, which will accompany the Local Plan at the next consultation in 2020. Regarding housing, the Council's Strategic Housing Market Assessment (SHMA) can be found on the Council's website.
2704	Mr Nicholas Williams		Para. 7.7 recognises the 'exceptional character' of north WF, which I believe is directly related to the current low density and nearby Epping Forest, that you have identified. Increasing density/developments will therefore likely have a direct adverse effect on the character that north WF & residents are rightly proud of, and will in the long term turn Chingford & Highams Park into just another urban area within LBWF, and the character will therefore be lost.	It is recognised that intensification could be associated with concerns about new development becoming inappropriate to their context and destroying much of what people see as valuable in their daily living environments. However, if well managed intensification could provide positive benefits to improve the quality of local environments. The plan contains a range of policies to guide the redevelopment of sites/areas whilst prioritising the protection of local character and green and open spaces.
2706	Mr Ashley Uglow		Principles such as this are always agreeable but they're not realistic.	This comment is noted for discussion.

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2707	Mr Ashley Uglow		The train crossing and surrounding area is already dangerous and limiting. A bridge/tunnel would be needed to cater for any further population growth. The bus routes are already unreasonable with buses incompatible with the narrow roads.	The issues regarding transport are noted. The Council will continue to work in partnership with TfL in developing appropriate sustainable transport policies that will assist in improving Waltham Forest's bus and rail network.
2708	Mrs Sharon Medhurst		I would welcome investment in the area. I am very concerned about the term intensification about developing Station Road. Part of the charm of North Chingford is that it is an attractive low rise suburban high street. I would especially like to know how tall the proposed buildings in the area would be. Nothing is currently higher than 3 stores and I feel that any taller would impact negatively on the area. 7. I'd like to know how the character of North Chingford was defined and how it is defined? Who gets to input this? As a local resident, I'd have expected some input and don't recall seeing this or being given the opportunity to input.	It is recognised that intensification could be associated with concerns about new development becoming inappropriate to their context and destroying much of what people see as valuable in their daily living environments. However, if well managed intensification could provide positive benefits to improve the quality of local environments. The plan contains a range of policies to guide the redevelopment of sites/areas whilst prioritising the protection of local character and green and open spaces. The Council has published its Characterisation and Intensification Study (2019) on its website.
2709	Mrs Sharon Medhurst		I would also like to complain that the brochure wasn't circulated to me by LBWF. It was brought to my attention by a friend who lives in another street that had received it.	This comment is noted.
2710	Mrs Sharon Medhurst		5. Where is the primary shop area and secondary areas defined in Station Rd. It is very difficult to work this out from the map. What are the implications for development if the area is classified as secondary or primary? Does this mean you'd build homes on the secondary area?	North Chingford is identified in the Local Plan as a Strategic Location. Policy 18 of the Local Plan sets out the Council's priorities for delivering a minimum of 300 homes in the area over the lifetime of the plan in addition to applying a flexible approach to retail in Station Road and encouraging the use of the centre to provide greater employment, creative, leisure and cultural opportunities. De-designation of secondary frontage is intended to promote alternative commercial, rather than residential uses on the ground floor in the district centre.
2711	Mrs Sharon Medhurst		I would be concerned about tall building on the edge of the forest and think this would ruin the village feel of Station Rd.	This comment is noted for further discussion.

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2712	Mrs Juliet Guinness		Any increase in housing will see the already-stretched schools and infrastructure struggle.	Infrastructure will be covered in an up to date Infrastructure Delivery Plan which will accompany the Local Plan at the next consultation in 2020.
2713	Mrs Juliet Guinness		The shops in North Chingford struggle already with paying the high rates on occupied properties, the reverse should be the case with empty properties having to pay higher rates to encourage owners to let them out and increase the occupancy rates.	This comment is noted for further discussion.
2714	Mrs Juliet Guinness		Parking restrictions are also a hindrance to shoppers so planning for the removal of car parks is not welcome, allowing a greater length of time for cars to stop on the high street would increase trade and make shops and businesses more viable.	Parking restrictions are an operational matter outwith the scope of the Local Plan. Regarding the development of car parks, this plan does not make site allocations. These will be consulted separately in 2020.
2715	Mrs Juliet Guinness		The Assembly Hall used to be very widely used and busy with group activities throughout the year, the increased cost of the hire of the hall has resulted in decreased usage, if you want to see it become more viable reduce the cost of hire, do not take away this asset from our community and replace it with a smaller venue just so you can pack in more housing in our conservation area.	This comment is noted. There are no proposals in the Local Plan that would involve the removal of the Assembly Hall as there are no site allocations in the Plan.
2716	Mrs Juliet Guinness		North Chingford is the gateway to Epping Forest it is not a metropolitan area, it is a conservation and ecological area and any building should reflect this, the idea of putting in highrise blocks of flats in any area of North Chingford is wrong. The area has Organiclea, Pimp Hall Nature reserve, the conservation area on The Green and the Forest, the businesses and builds of the future should reflect the history and ecological nature of the area and more business that reflect this would be welcomed.	North Chingford is identified in the Local Plan as a Strategic Location. Policy 18 of the Local Plan sets out the Council's priorities for delivering a minimum of 300 homes in the area over the lifetime of the plan in addition to applying a flexible approach to retail in Station Road and encouraging the use of the centre to provide greater employment, creative, leisure and cultural opportunities. The plan proposes a range of policies to protect and enhance the character of the area and the natural spaces that surround it.
2717	Mr Michael Freeman		You are trying to change the whole area when it is not wanted or sustainable in the Sewardstone Road/Kings Head area. As for suggesting that the 'Gateways' to the borough will improve the welcome look to Chingford visitors, we don't think, by any	It is recognised that intensification could be associated with concerns about new development becoming inappropriate to their context and destroying much of what people see as valuable in their daily living environments. However, if well

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			stretch of the imagination that this can be achieved. To come into Chingford via the King George Reservoirs, via Station Road or Sewardstone Road and the first thing visitors would see are multi storey blocks of flats is not an image I would recommend.	managed intensification could provide positive benefits to improve the quality of local environments. The plan contains a range of policies to guide the redevelopment of sites/areas whilst prioritising the protection of local character and green and open spaces. The Council has published its Characterisation and Intensification Study (2019) on its website
2718	Mr Michael Freeman		Yes we all appreciate that homes should be provided but as somebody said at the St Peters consultation you can't fit a quart into a pint pot. Until any plans are produced nobody can comment. We just hope that our voices are heard and that the current traffic problems are not made any worse.	This comment is noted. The Council will be consulting on its Site Allocations document in 2020.
2719	Mrs Bernadette Bergin		New homes and new jobs are welcome, but not to the detriment of the character of the village.	The Local Plan proposes a range of policies to protect and enhance the character of the area and the natural spaces that surround it.
2720	Mrs Bernadette Bergin		I do not feel the development principles adequately describe what the plans are. High rise offices and dwellings in the area are not in line with the tag 'Gateway to the forest' used by the council. Any development should be in keeping with existing buildings.	This comment is noted. The plan proposes a range of policies to protect and enhance the character of the area and the natural spaces that surround it. The plan is backed by a Characterisation and Intensification Study (2019) which sets out a range of measures to ensure that new development is respectful of area character.
2721	Mr Mark Sheldrake		Parking in the area is not great and the additional houses will generate extra traffic - what is the proposal for this? The cycle lanes in the north of the borough are a complete joke. The painted white lines are ignored by motorists and become parking in the afternoon/ evening. They are badly maintained and not swept enough to cycle in to avoid broken glass etc Considering lots of cyclist use the north of the borough to reach Epping Forest, more dedicated cycle routes should be built to encourage cycling through in a safe manner. Speed humps might slow motor vehicles temporarily, but do not help cyclists and close passes also occur more frequently before or after these traffic calming initiatives. You need to sort out the car	The Local Plan reflects the Council's commitment to TfL's Healthy Streets principles and the Mayor's Transport Strategy to provide low traffic liveable neighbourhoods. Comments in relation to parking issues are noted and the Council is committed to the reduction of private car use in the lifetime of this Local Plan. Policy 72 sets out the thresholds for car parking in the borough in line with the Intent to Publish London Plan 2019, which includes the contributions that future development may make in the extension of parking controls in the borough.

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			park next door to Sainsburys in Chingford Mount and the parking in the road nearby, especially on Sundays. The single yellow lines nearby mean the car park, where you have to pay on a Sunday, doesn't get used and the road gets blocked with parked cars. I'm sure Sainsburys could convert their offices above the store into flats rather than the derelict offices without too much impact and the car park could be converted in a similar manner. You just have to make sure that car parking is included so people do not park in adjacent roads. Finally, considering there are large parts of the area that have to rely on a bus to a station for onward central London travel, the bus lanes and cycle lanes are not good enough to support this.	
2722	Mrs Christine Shepherd		All new homes built should be supported by an increase in health, education and appropriate infrastructure, including leisure facilities. All new buildings should take into account the existing special nature of what is essentially a 'village community'.	The Local Plan will be supported by an up to date Infrastructure Delivery Plan in line with the requirements of the NPPF (2019) and the Intent to Publish London Plan 2019. This document provides a framework for how the requisite infrastructure will be funded and located in order to deliver the growth required in the Local Plan
2723	Mrs Christine Shepherd		No high rise buildings. Redevelop the assembly hall as a community resource. Including the library, we need leisure facility, gym, affordable meeting spaces for community groups , small theatre and film facility, Registrar for births , marriages and deaths could relocate as a branch service, (it is very difficult for a lot of people to access the Grove Road offices). They do this in other places in UK. Facility for adult education classes, none at the moment in north of the borough	The Local Plan does not contain site allocations. As there are references to uses associated with social infrastructure, these will be addressed in the infrastructure Delivery plan that will accompany the Local Plan.
2724	Mrs Christine Shepherd		Improve access to forest with suitable notices etc.	Access to the Forest is a matter for the Corporation of London and the Conservators of Epping Forest.
2725	Mrs Christine Shepherd		Improve parking, as many residents are elderly, increase free parking to half an hour.	Operational aspects of parking policy are covered by the Council's Highways section and do not fall under the Local Plan.

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2726	Mrs Christine Shepherd		Protect and extend the conservation area further down Station Road.	Conservation Area boundaries are presently under a separate review.
2727	Mrs Christine Shepherd		Ensure adequate health and education support for residents of all new houses built.	The Local Plan will be supported by an up to date Infrastructure Delivery Plan in line with the requirements of the NPPF (2019) and the Intent to Publish London Plan 2019. This document provides a framework for how the requisite infrastructure will be funded and located in order to deliver the growth required in the Local Plan.
2728	Mrs Gillian Moran		Whilst appreciating that homes are needed, your idea of sensitive intensification is anything but. The Characterisation report was not what everyone was expecting. It does not capture the true character of North Chingford. All it does is serve as a justification to build higher rise than the rest of the area. Classing the station / DVLA car park / bus station in a category that would allow 6-10 storeys is outrageous. The Assembly Hall / library site abuts the Conservation area and again anything higher than what is already there would be detrimental to the green. Although not against development of the site to give a better multi functional community space at an affordable cost and a better library would be very welcome.	Noted. The Characterisation and Intensification Study 2019 sets out a series of approaches to design intended to mitigate the general impacts of development based on an analysis of local character. None of the sites referred to here are referenced in that document nor in the Local Plan. These sites appear to be drawn from the Area Investment Plan, which was a discussion document not part of the Local Plan.
2729	Mrs Gillian Moran		Building on current car parks, (Richmond Rd) will be an issue if no additional parking is provided for extra homes. It is all very well wanting to have car free high streets but the reality is that if the parking goes the shops will suffer even more. The population in this area has a high percentage of retired people. They may not be comfortable or able to travel on public transport and if no parking would not come to the local high street. These are the people that use our local shops regularly and support all the businesses. It appears that no one has done a proper survey. Every morning all the cafes are full of retired or older people. Also there is no mention of any of the proposed	It is recognised that intensification could be associated with concerns about new development becoming inappropriate to their context and destroying much of what people see as valuable in their daily living environments. However, if well managed, intensification could provide positive benefits to improve the quality of local environments. The plan contains a range of policies to guide the redevelopment of sites/areas whilst prioritising the protection of local character and green and open spaces. In addition to an extensive programme of consultation events between July and September 2019, the Council has published its Characterisation and Intensification

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			<p>housing being suitable for older residents, possibly with a view to downsizing, therefore freeing up family homes. Why is the site in Gordon Road still unresolved? (The care home that wanted planning for retirement flats that has had to go to appeal) North Chingford has not been funded fairly by the Local Authority. Projects delayed, community groups trying to improve the area with little cooperation from the council (LNC) Even self funding projects. So what confidence can we have that you will be pumping money into our local economy or employment prospects? The prospect of the bus station being located under flats is not acceptable. It would mean 2-3 storeys just to accommodate this. There will also be safety issues as I doubt adequate security would be present at night. Engagement with our local community needs to dramatically improve. We have good people willing to make this a better place to live, the council is short sighted in not encouraging and supporting this, or going against the will of the people.</p>	<p>Study (2019) on its website along with other evidence base documents including the Town Centres and Retail Study (2019).</p>
2730	Mr Richard Griffin		<p>See above. Also, the Plan should have begun with consultations with local people BEFORE it was written.</p>	<p>The Local Plan was the result of a Direction of Travel document published for consultation in November 2017-January 2018.</p>
2731	Mr Richard Griffin		<p>The current local infrastructure - GPs, schools, trains, roads - is over stretched. Additional housing will add further pressure for example reducing further access to GPs and over crowding on trains. The council cannot force TfL to run more trains nor address the shortage of doctors. Assessing the infrastructure should be the starting of the Plan not follow the decision to meet the mayors target. The Plans ambiguity about the future of the Assembly rooms is concerning and contradicts the aspiration to increase cultural activity in the area. The character of the area, celebrated in the Plan, will be compromised by the proposal to build taller buildings. While other aspirations such</p>	<p>It is recognised that intensification could be associated with concerns about new development becoming inappropriate to their context. However, if well managed, intensification could provide positive benefits to improve the quality of local environments. The plan sets out a well-managed approach. It contains a range of policies to guide the redevelopment of sites/areas whilst prioritising the protection of local character and green and open spaces. Infrastructure will be covered in an up-to-date Infrastructure Delivery Plan, which will accompany the Local Plan at the next consultation in 2020.</p>

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			as renovating high streets is welcome but the Plan is vague about how that will be achieved.	
2732	Mrs Lesley Thelwell		Again I'm only commenting on the Sewardstone Road site. Again I'm referring to the additional traffic congestion. Our area is already used as a rat run because of the congestion at the lights at that junction and with the possibility of an extra 400 cars trying to use this junction it will be a nightmare. I don't believe your assumption that more bikes will be used, what about the elderly who need a car. I can't see myself riding round on a bike!!!. The block which has been empty for nearly two years is an eye saw and there was never any parking space to use the shops anyway so how will that problem be solved as those business rely on passing trade! The McDonald's drive through should never have been allowed as that courses more congestion.	The issues regarding transport and congestion are noted. The Council will continue to work in partnership with TfL in developing appropriate sustainable transport policies that will assist in improving Waltham Forest's bus and rail network. The Local Plan reflects the Council's commitment to TfL's Healthy Streets principles and the Mayor's Transport Strategy to provide low traffic liveable neighbourhoods.
2733	Mrs Lesley Thelwell		I think I have covered most things above. I agree homes need to be built but not on already very busy junctions	This comment is noted for further discussion.
2734	Ms Webster		I do not think the policy principles are clear and transparent so it is difficult to comment in detail. However, the plans do not include how the impact upon local services will be managed. Local schools, GP services and transport are already stretched to capacity and beyond when thinking about transport. Adding additional housing will only add to this problem. Saying that this is not the LAs responsibility but down to, for example, the NHS or TfL will not address this issue and suitable plans should be in place before plans should be considered. All agencies should work together prior to the plans being put forward. I am very confused as to the term taller buildings (I did try to clarify this when I attended one of the meetings) but did not receive any useful information. In an area without tall buildings the addition	Infrastructure will be covered in an up-to-date Infrastructure Delivery Plan, which will accompany the Local Plan at the next consultation in 2020. The Council is committed to working with working with agencies such as the NHS and TfL through the consultation process and beyond to ensure that the policies in the plan are sound and deliverable.

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			of taller buildings will in no way add to the area other than to create additional housing. The plans do not indicate in any specific way as to how they will add to local culture and community. The LA has had many years to support the North of the borough with regard to this and to date the only impact generally is negative, for example, increasing the hire fees for the Assembly Hall which has meant that this potentially great resource is now underused. I am aware that there are plans to develop this area potentially for housing and wonder about the LAs strategic plans in raising rents and thereby reducing use prior to saying that therefore the land can be used for something else.	
2735	Ms Webster		I am very confused as to the term taller buildings (I did try to clarify this when I attended one of the meetings) but did not receive any useful information. In an area without tall buildings the addition of taller buildings will in no way add to the area other than to create additional housing.	This comment is noted for further discussion as it is recognised that intensification could be associated with concerns about new development becoming inappropriate to their context and destroying much of what people see as valuable in their daily living environments. However, if well managed, intensification could provide positive benefits to improve the quality of local environments.
2736	Ms Webster		The plans do not indicate in any specific way as to how they will add to local culture and community. The LA has had many years to support the North of the borough with regard to this and to date the only impact generally is negative, for example, increasing the hire fees for the Assembly Hall which has meant that this potentially great resource is now underused. I am aware that there are plans to develop this area potentially for housing and wonder about the LAs strategic plans in raising rents and thereby reducing use prior to saying that therefore the land can be used for something else.	This comment is noted for further discussion.
2737	Ms Webster		I oppose the plans. I do not think that the Mayor's housing target is achievable without immense detrimental effects upon those already living in the borough and those who would move	The Local Plan has to be in general conformity with the London Plan in order for it to be found sound and to pass its examination. Accordingly, it is not possible for the Council to

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			into the new housing. The borough is already stretched beyond capacity with regard to traffic, transport, health services and education. I think the borough on behalf of all who live here should be opposing the Mayor's target rather than trying to meet it.	set aside the Mayoral housing target noting that the Council's own Strategic Housing Market Assessment (SHMA) arrived at a very similar figure to the London Plan housing target.
2738	Mrs Catherine Branch		<p>There are few specifics - all we have been told is a minimum of 300 units are to be built in the N.Chingford town centre. May I draw your attention to your own findings? 7.4 The area has two London Overground Stations: Chingford and Highams Park, but is generally less accessible than the south and central areas of the borough. These two stations are located in the respective District Centres, with Chingford station being a gateway to Epping Forest. 7.6 Overall, the character of the north is generally suburban and lower density compared to the Central and South areas of the borough. The area is characterised by semi-detached houses and terraces with some larger detached properties. 7.7. Epping Forest and the borough's fringe of Green Belt are major green assets which give this part of the borough an exceptional character. Our concerns are as follows; these are mainly for North Chingford as that is where we live. Change is inevitable, but it must be in keeping with the needs of the people living in the area. If the Village is to be enhanced, then services such as health centres, schools, libraries and community halls MUST be incorporated into the plans to accommodate all these extra people. Leaving infrastructure to be market driven, meaning that to begin with there are none of the above, will only create ghettos of high density housing with none of the support structures needed. Adding 'bulge on bulge' to existing oversubscribed schools is untenable and unfair. WHERE exactly are these units to be built? We have no specifics and only rumours of possible sites.</p>	<p>This comment is noted. Policy 18 sets out the general approach to the North Chingford area which is primarily to reflect its local character and distinctiveness. Your comments regarding the role that infrastructure has to play in this is acknowledged and when next version of the Local Plan consultation takes place in and will include an up-to-date Infrastructure Delivery Plan and a Sites Allocation document.</p>

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2739	Mrs Catherine Branch		IF extra units are to be built on 1) Richmond Road. If this car park is to be built on, where are shoppers supposed to park? Two smaller car parks have already been closed and built on. 2) Waltham Forest council specify that District Centres will be the primary focus for development and investment in shops, services, leisure and community. A mix of uses will be supported in centres to ensure the development of vibrant centres which meet the needs of the local communities that they serve (13.48 B). 3) Not everyone lives within walking distance of the shopping centre. The elderly, mothers with small children and those with disabilities will have no options but to drive. Cars will not go away because they are inconvenient for planners so must be catered for! Station Road will die if there is no parking and traders and residents alike will suffer.	In line with the London Plan, the Council is committed to the delivery of Liveable Neighbourhoods and Healthy Streets in the borough. This means that active modes of travel and public transport will be prioritised in order to improve air quality, provide better public realm and wayfinding, reduce road danger and increase the attractiveness of the district centre to residents and visitors.
2740	Mrs Catherine Branch		We are also very concerned about building over 4) The station and bus garage- a height restriction MUST be implemented as that would be the first view anyone sees coming from Epping Forest end - with Chingford station being a gateway to Epping Forest. (7.1)	Policy 18 refers to exploring development potential in the area of Chingford Overground Station. It does allocate either the bus or Overground station for development. The Council will publish its Site Allocations document for consultation in 2020.
2741	Mrs Catherine Branch		How the following has been interpreted or defined 'Apply place-making principles that reflect the character and local distinctiveness of North Chingford, particularly taking advantage of the heritage, cultural and green assets;' (policy 19.7) Where is this study, who wrote it, do they have any knowledge or connection with this area? Without this how can any consultation take place and be valid? 6) 'Protecting and enhancing the Chingford Green Conservation Area.' How? What are the plans, which must include the library and more specifically, the Assembly Hall being right on top of and beside the Conservation Area?	The comment is noted and the Characterisation and Intensification Study is online at https://walthamforest.gov.uk/sites/default/files/LBWF%20Character%20and%20Intensification%20Study%2C%02019.pdf This document sets out the principles to be considered in relation to area character assessment.

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2742	Mrs Catherine Branch		We have not been given enough information about the actual changes and how they will affect the area we live in, therefore any responses can only be vague. You instil fear when information is withheld, people will imagine the worst. This is short-sighted and foolish. We need to see the studies promised so that a proper and reasoned response is given, knee jerk reactions to change are unhelpful to all concerned, but without information that is what you will get. The sheer number of units, which if built, will totally change the nature and character of North Chingford as your finding show, (7.4, 7.7, 7.7). My husband's family have lived here for over 100 years and it was and still is, known as 'The Village'. The total projected number of units to be built over the whole borough is more than central government asked for so why force a quart into a pint pot when it's not even needed? These issues are vitally important and we urge you to please consider them and respond accordingly.	This response is noted. The Council has published its Local Plan and the associated evidence base documents on its website. In addition, the Council will be consulting on the next stage of the Local Plan and on a Site Allocations document in 2020
2757	Mr Jeremy Clayden		Sewardstone Road has poor transport links. Routes towards Meridian Water and Ponders End have solid queuing traffic at peak times often along the whole length of these routes. There are no cycle routes in any direction from Sewardstone Road and the roads are dangerous for cyclists. The Council has done nothing to support cycling in this area. The Local Plan implies that the Council will put in cycle routes in this area but there are no specific details about how they would do this. As far as I can tell, there is nothing binding in the plan to say the Council MUST put in cycle routes, nor is there anything in the plan that qualifies the term 'cycle route'. For example, is the Council just planning to draw a line on the road and call this a cycle route? Chingford Foundation School is not accessible in any direction by a safe cycle route. Nevin drive and College Gardens get jammed up every morning with cars taking children to school. The Council has made no attempt to make the roads safe for	The issues regarding transport are noted. The Council will continue to work in partnership with TfL in developing appropriate sustainable transport policies that will assist in improving Waltham Forest's modal shift transport policies.

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			school children on bicycles. The school itself has no safe area to store bicycles. Bikes left outside the school office are vulnerable to being tampered with or damaged. The school has no cycle officer and does not encourage cycling. If people in the borough are to adopt a culture of cycling, why does the Council do nothing to encourage kids to cycle to school? Can the plan give specific details about how safe routes for cycling will be put in place for students to get to Chingford Foundation School?	
2758	Mr Stuart Grix		Capitalising, Intense private dwelling building within the shops will not save or reinvent our town centre. The Assembly Hall and its high charges has deliberately created a white elephant and has deliberately not been accessible by local people.	This comment is noted. The Local Plan does not set the Assembly Hall Charges.
2759	Mr Stuart Grix		You are planning housing and keep referring to Culture? A complete nonsense argument or reason. There is nothing attractive or enhancing about the type of development you propose. Your language in your presentation is a nonsense.	Culture for all Londoners is the Mayor's landmark strategy for culture. Culture and the creative industries contribute £52bn to London's economy every year and account for one in six jobs in the capital. The Local Plan plays a significant role in the delivery of the London Plan.
2763	Mrs Janet Charlesworth		My main objection is that you make no reference in your plan to the Highams Park Neighbourhood Plan which has now passed its inspection and which substantially reflects the views of local residents, gathered over five or six years, on their ideas for sustainable development.	The draft Local Plan has a borough-wide strategic focus to be supported by supplementary planning documents, master plans for identified local areas. The Council recognises the supporting role of neighbourhood plans such as that being prepared by the Highams Park Planning Group.
2764	Mr Stuart Grix		The gateway to the forest will be destroyed. Any building will be completely inappropriate and too intense. Sometimes there is not an appropriate place to build.	This comment is noted. The Council is working closely with the Conservators of Epping Forest and other stakeholders to ensure that the delivery of development in the north of the borough does not have a detrimental impact on Epping Forest.
2765	Mr Stuart Grix		The area will be far from enhanced. How can quality homes improve the public realm by destroying the look of the area and intensifying it. A liveable neighbourhood requires quality shops and parking not more intense housing and less infrastructure. The existing local schools should not be expanded to take in more pupils, this is unfair on the current residents.	The Local Plan will feature an Infrastructure Delivery Plan when it is put out for consultation in the summer of 2020. The Plan proposes a balance of development and the appropriate supporting infrastructure.

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2766	Mrs Yvonne Sanders		The vision sounds OK until the number of homes is factored in. The volume of 250 new accommodation units in Station Road and 4,000 in North Waltham Forest as a whole will negate the features listed in 7.4, 7.6 and 7.7 that make North Chingford the place that residents love to call home. Any building above four stories would be totally unacceptable as North Chingford has a lovely village feel and anything above four stories would make it urban and lose its character.	The Characterisation and Intensification Study 2019 has considered how new development could be accommodated at different locations throughout the borough. The Council is preparing an additional Local Plan document on site specific allocations. This will provide opportunity to apply the policies of the plan on specific sites, providing more details on how new developments could be integrated within existing local areas. The draft Local Plan contains a range of policies to guide redevelopment proposals also ensuring that new development is carried out in harmony with its local setting and makes a positive contribution to the local environment.
2767	Mrs Yvonne Sanders		What are the proposals for improved public realm? Where is there room for new workspace ? All the focus is on housing?! Flourishing cultural offer for the local community and visitors - the Council has overpriced the Assembly Hall so community groups and others no longer hire it! The Adult Education Centres in the North of the borough have all been redeveloped as housing already, the Library is a pale shadow of what could be a thriving cultural offer.	Improvements to the public realm will be sought mainly through planning obligations. It is considered that additional housing and employment needs could be accommodated as part of mixed use development. The point made about the Chingford Assembly Hall and other community facilities is noted. The draft Local Plan does not deal with asset management issues. However, this point is noted for referral to the Council's Asset Management Team. The plan contains policies to protect existing social infrastructure and community uses (see Policy 55).
2768	Mrs Yvonne Sanders		The North forms the gateway to Epping Forest and its richly diverse ecology and contrasting natural landscapes - this should NOT be trashed by inappropriate over development and tall buildings! The 'disconnect' between the District Centre and the Forest would be easily remedied by attractive signage at the Station. The Council has done little to improve the District Centre in NC - the paintwork on all the street furniture is a disgrace, the municipal planters and beds are being tended by volunteers as to date, the Council contractors have neglected them.	The draft Local Plan contains a range of policies to guide growth and redevelopment in all District Centres and to support vitality and attractiveness. To complement this and encourage regeneration, the Council is preparing a High Street Strategy for this centre.

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2775	Miss STEPHANIE VANEZIS		I do not believe that proper thought has been put into the effect that the changes will have to the community and borough as a whole.	This comment is noted.
2776	Miss STEPHANIE VANEZIS		As well as being concerned about how the area will dramatically change in general, I am also concerned on a personal level. I live on Beresford Road and my property backs on to the bus depot. One of the reasons that we bought the property was because there were no dwellings to the rear and I am devastated about the fact that buildings may now be erected, As well as the general disruption, my property may now be overlooked which will mean that the way we live at our home will change. We have a large oak tree at the rear to our garden and I am extremely concerned as to the effect any building works may have to its roots. It may well be protected!	The Council is aware of speculation concerning the Bus station and other sites in the local area. There are no site allocations in the Local plan. We will be consulting on a Site Allocations document alongside the Local Plan in the summer of 2020.
2777	Mrs Claire Hudson		North Chingford is a gateway to Epping Forest, one of Londoners' most precious resources. Developments described in the planning document so near Forest land is insensitive.	The Local Plan will be supported by Sustainability Appraisal and Habitats Regulations Assessment. Both documents consider the environmental effects of the plan. Work is currently in progress on these documents. Necessary mitigation measures as identified from this assessment will be applied.
2778	Mrs Claire Hudson		LBWF has ignored the preferences of local people by making the charges for use the Assembly Hall unaffordable for special interest groups. Events for and by local people would bring additional footfall to the retail offer in Station Road and demonstrate that LBWF is actually interested in letting local people be actively involved in the cultural life of the area.	The plan seeks to protect social infrastructure uses including meeting halls (See policy 55). The issue raised about the operational management of the Assembly Hall (events/hiring costs) is outside the remit of the Local Plan and will be referred to the Council's Asset Management Team.
2779	Stonecrest Marble Ltd Stonecrest Marble Ltd	Stonecrest Marble Ltd	Our client supports the vision for North Waltham Forest, which confirms that areas adjacent to the North Circular Corridor will provide opportunities for, intensified industrial and employment generating uses supporting the western fringe of the area. Our client supports the Local Authorities intention to review Green Belt boundaries and for the reasons set out within Chapter 6 of this representation, consider that our client 's site	The Council notes the statement of support provided. Regarding the release of Green Belt sites, this point is noted for careful consideration - mindful of the strategic policy requirements of the London Plan, the findings of the Council's evidence base on Green Belt/MOL and the need to demonstrate exceptional circumstances.

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			should be released from the Green Belt, in order that it can be brought forward for development. Development on our client 's site would contribute to the 'Vision for the North of the borough ', in that it will contribute towards the 'dynamic employment environment provided by the North Circular sites	
2780	Ms Sarah Chaney	Secretary Larkwood and Valley Branch Labour Party	There are no train stations in South Chingford. Explore the provision of a tram/train/Tube link in Chingford Mount and Chingford Hatch (e.g. linking to Woodford on the central line or utilising former station at Chingford Hatch)	This is noted for further consideration. The Council is gathering evidence through a transport study.
2781	Ms Sarah Chaney	Secretary Larkwood and Valley Branch Labour Party	Increase frequency of trains on Chingford line or longer trains (more carriages - if feasible given length of station platforms). Explore re-zoning of stations to reduce congestion on roads by reducing travel costs - move Highams Park from zone 4 to zone 3 and Chingford from zone 5 to zone 4	This point is noted for further discussion and consideration with TfL - the responsible body for implementing the Mayor's Transport Strategy and managing transport services across the capital.
2782	Ms Sarah Chaney	Secretary Larkwood and Valley Branch Labour Party	Bus links between stations to be improved by additional buses (linking South Chingford to Highams Park, Woodford or Tottenham Hale). Parts of Chingford lack any bus links. Improve roads to reduce congestion, adding bus lanes where possible - e.g. along north circular (34 route). Another potential way of increasing access to the area would be free buses for all - reduce driving and therefore congestion by encouraging bus use. Connect Chingford Hall Estate to North Circular to reduce traffic on Chingford Mount Road.	This point is noted for further discussion and consideration with TfL - the responsible body for implementing the Mayor's Transport Strategy and managing transport services across the capital.
2783	Ms Sarah Chaney	Secretary Larkwood and Valley Branch Labour Party	Consider tramway to improve congestion east/west - extension across marshes to Clapton - as well as north/south.	This point is noted for further discussion and consideration with TfL - the responsible body for implementing the Mayor's Transport Strategy and managing transport services across the capital.
2788	Councillor Alan Siggers	Councillor	Is the housing requirement justified, will there be a sufficient supply of housing over the plan period, will there be a 5 year	The housing target for the North Sub area is justified by evidence published through the Growth Capacity Study 2019. This study has identified sites to meet the housing target. From

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			supply of housing sites and is the overall target for affordable housing and the type of tenure justified?	the recently published AMR document (2018/19) the Council has a 5 year housing supply. The plan seeks to deliver a broad range of housing choice by size and tenure including affordable housing, also catering for people with special housing needs (See Housing Policies - Chapter 8).
2789	Councillor Alan Siggers	Councillor	The draft WFLP proposes the building of 27,000 new dwellings by 2035, which exceeds the target set by the Mayor of London by 3,300. We are concerned that in the North and South areas of the borough described in the local plan, the figures quoted are minimums. These should be maximum figures and should be regularly monitored. The portfolio holder has defended this by saying that this plan exceeds the timescales contained in the London Plan and therefore the higher number is justified.	This point is noted for further consideration - also mindful of the borough's reduced housing target as stated in the emerging London Plan (Intend to Publish version, December 2019)
2790	Councillor Alan Siggers	Councillor	Section 8 of the WFLP "Decent Homes for Everyone" states the "Policies in this chapter should be read alongside the Waltham Forest's Housing Strategy 2019-2024, Housing Futures: A Decent Roof for All. The Housing Strategy sets out the key objectives for housing in the borough, which this plan will be instrumental in achieving". There is no reference to the housing need assessment no more of how five-year land supply is calculated. It is assumed this will be part of the evidence base provided later, particularly as at 8.1 the policy states that 9000 Homes will be provided in the last five years (2030-35).	The Council has carried out a study assessing housing need requirements. This evidence (Waltham Forest Housing Market Assessment) is published on the website. Evidence on 5 year Housing Supply has also been published as part of the AMR (2018-2019) also published on the website.
2791	Councillor Alan Siggers	Councillor	There is no acknowledgement of the character of the area. Judging by what has happened in the middle and South of the borough it is likely that tower blocks are planned.	The concern raised about the impact of growth on local character is recognised - in particular that new development could become inappropriate to the existing local context. The draft Local Plan acknowledges the distinctive nature of the different parts of the borough and sets out a spatial approach that takes account of the unique character of local areas and the diverse communities (see Policy 5 on the approach to intensification and density, and also Chapter 14 - Creating High Quality Places). These policies will guide growth in local areas to

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				ensure that new development is carried out in harmony with its setting and makes a positive contribution to the local environment.
2793	D Kendall		Changes - More frequent train timetable Affordable dedicated commuter parking. Fewer restaurants, cafes, takeaways, betting shops, charity shops, beauty parlours and tanning salons. More quality shops. More cultural activities in N. Chingford. BoC activities haven't featured much other than evening activities in the Forest. Concerts shows or plays at Chingford Assembly Hall? Quality supermarket to replace Budgens in Station Road Another GP Practice and a pharmacy Direct bus service from Chingford Bus station to Whipps Cross. Better street lighting	The Local Plan will be accompanied by an up to date Infrastructure Delivery Plan when it is published for consultation in the summer of 2020. The IDP will outline the need for schools and health services and how such needed will be met through development.
2799	D Kendall		The language in the section on North Chingford 4-page draft consultation document makes it inaccessible. We felt whoever wrote this document did not understand the neighbourhood well enough as the proposals seemed to suggest the opposite of "evolution" and neither do we recognise Station Road as a "thriving cultural suburban town centre". Phrases such as "sensitive area investment", "sensitive intensification . "allowed to evolve into a more diverse cultural town centre" and "intensifies land use at the bus station" which raise anxiety were not explained. The two local consultation meetings which we each attended did not unpick this language. We do not recognise North Chingford as either being particularly thriving or vibrant. The full plan is a very long and complex one for a resident/private individual to access and read online and we found the method of providing an online response unnecessarily complicated, so have had to resort to paper. We were only given 2 days notice of local public meetings in the North Chingford area. The first meeting was a fiasco -with no organisation and unbadged Council officers and attending	These comments are noted. The consultation period ran between 22 nd July to 30 th September 2019. The timetable was published in advance on the Councils website and in Waltham Forest News. Leaflet drops were organised for each consultation event and attendees were invited to sign up to the Councils newsletter. The first drop-in attracted over 245 visitors. Other consultation events were held during the consultation period and since - the most recent being on 28th January 2020.

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			<p>Councillors who knew nothing about the consultation. The second was a strictly limited (60) ticket only event. Most neighbours and friends in the neighbourhood knew nothing about the meetings and it was only at the meetings where it was possible to glean some information of the proposals, so we feel many residents have been left in the dark. It follows that we are concerned that the lack of publicity (only those signed up to Council emails) concerning such an important yet largely inaccessible document which may not have reached all residents or has put many residents off responding. In our response we are unable to comment on each of the 12 individual policies - but instead we focus on any proposed change to the Station Road/North Chingford area.</p>	
2801	D Kendall		<p>In the main we strongly disagree and totally oppose any proposals for the building of 300 higher density housing units which could result in changing the unique and special character of Station Road/North Chingford forever. Such an irrecoverable proposal would not be evolutionary but revolutionary and deprive local residents as well as visitors from further afield of an extremely valuable asset and amenity which has existed since the 1870s and was the object of a royal visit by Queen Victoria when the Forest was 'given' to the people. We set out our reasons below: As the Chingford Station area is the gateway to Epping Forest, any proposals to build over the adjacent bus station, the Driving Test Centre car park and on the opposite side of Station Road, would be entirely inappropriate and will irrecoverably and entirely spoil the unique special character of North Chingford and its historically close association with Epping Forest. Chingford Station is a major heritage asset and merits being regarded as such due to its historic significance with regard to the opening of the Chingford - Liverpool Street Railway and the opening up of Chingford</p>	<p>It is recognised that intensification could be associated with concerns about new development becoming inappropriate to their context and destroying much of what people see as valuable in their daily living environments. However, if well managed intensification could provide positive benefits to improve the quality of local environments. The plan contains a range of policies to guide the redevelopment of sites/areas whilst prioritising the protection of local character. In this vein Policy 18 refers to exploring development potential in the area of Chingford Overground Station. It does allocate either the bus or Overground station for development. The Council will publish its Site Allocations document for consultation in the summer of 2020.</p>

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			<p>Plains and Epping Forest to hundreds and thousands of East Londoners from the 1870s to this day. The walk from Chingford Station up to the Royal Forest, Connaught Waters, Queen Elizabeth Hunting Lodge, Butlers Retreat and beyond is still undertaken by many in today's world and the current local Chingford street scene, though not ideal, is certainly better than lining both sides of the Forest end of Station Road with inappropriately high and aesthetically unattractive and unsympathetic Post-modernist apartment blocks with ugly balconies (as around the the rest of the borough and out of keeping with local Victorian and Edwardian properties), and in particular , over the top of the bus station , which will make the Forest end of Station Road very much busier and unappealing. Chingford Station, together with its curtilage and forecourt , and the surrounding area should be protected in particular from being over-sailed through the building of over large tall buildings in close proximity. The Walthamstow Central Station building has been totally overshadowed by a line of ugly tall buildings and it is now almost unrecognisable as a Victorian station building. Chingford Green is not the only part of Station Road, Chingford which needs protection as a green space or cultural asset. The Chingford Station area and the walkway to the Forest also needs protection too. we also oppose the building of any further homes in the area without provision of a parking space each as the geographical position of North Chingford means it cannot be treated as an urban centre such as other parts of the borough. It is not well connected enough and many residents have to travel by car to use amenities outside of the borough. In our own case, we have to travel to Enfield to shop at Sainsbury's on the Southbury Road or to South Woodford and at our age (over 65) cannot be expected to carry our weekly shop home using bus services which run</p>	

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			only every 115 or 20 minutes. Oppose any attempt to take away Green Belt land of any kind. Oppose any attempt to introduce or impose a parking zone.	
2805	Mrs Krysia Sivyer		It is understood that there has to be new homes built throughout London and if they can be built with the sensitivity described, all well and good. But the word "encouragement" has been used a lot. We want more than that, it has to be mandatory for homes built with sensitivity to the areas, with respect to the environment and with community involvement.	The concern raised about the impact of growth on local character is recognised - in particular that new development could become inappropriate to the existing local context. The draft Local Plan contains a range of policies to guide growth and change and to ensure that new development is carried out in harmony with its setting and makes a positive contribution to the local environment. See Policy 5 (Approach to Intensification and Policy 62 (High Quality Design) and Policy 63 (Tall Buildings). Other policies also consider amenity and other issues relating to local character. All of these policies are considered in decision making, ensuring that an appropriate balance is maintained between competing objectives and that new development is sensitively designed.
2806	Mrs Linda Woods		Safety is also of concern and should be incorporated into the Plan and any development, including CCTV extension.	This point is noted. It is proposed to include a substantive policy dealing with community safety.
2807	Mrs Linda Woods		I attended the Councillor consultation evening. I am concerned about the 'development opportunities' presented by the bus station and DVLA car park. The idea of a mid to high rise residential building with the bus station underneath it is absolutely not in keeping with the suburban 'village feel' of the centre and I am opposed to it. The Councillor or planning officer refused to give any assurance on height restrictions for new builds which residents need assurance on.	The draft plan made reference to some sites, only as examples of sites with redevelopment potential. The Council is preparing an additional Local Plan document on site specific allocations. This will provide opportunity to apply the policies of the plan on specific sites, providing more details on how new developments could be integrated within existing local areas.
2808	Mrs Linda Woods		Insufficient emphasis is made on supporting and growing local businesses. It seems to me that vacancy rates are quite high with high turnover.	The plan makes reference to the Council's Economic Strategy, which seeks to keep, seed and grow businesses in the borough. Policy 67 seeks to broaden the economic base of the borough through the provision of a range of employment spaces. Also, Policy 43 supports the growth of existing and future start-ups,

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				SME's and businesses. The Council is addressing the challenges affecting its town centres in a number of ways such as through the preparation of town centre strategies and other regeneration initiatives. The Council is working to prepare a High Street Strategy for North Chingford. Further information will be published.
2809	Mrs Linda Woods		North Chingford is unique and distinctive in that it merges into Epping Forest. I don't feel the Vision protects this sufficiently. It is not metropolitan and I do not wish to see it become more metropolitan.	This point is noted for further consideration.
2810	Mrs Linda Woods		I would also like to see cleanliness feature high in the Plan, N Chingford sadly tends to look quite dirty and shabby. As well as Public Realm, the Vision should explicitly include sufficiency and accessibility of doctors surgeries, schools, hospital, etc. to cope with the increased residents needs.	This point is noted for further consideration. It is proposed to revise the vision statement.
2811	Mrs Emily Heap		My main concerns as a Highams Park resident is the parking infrastructure for any new housing. At present having no CPZ means that many commuters use the area to park in for the train, many people leave cars from other local areas that are under CPZ and many cars are left for long periods of time from owners registered nowhere near the area. Living here, it can be extremely difficult to find parking anywhere near my house. Introducing further housing will inevitably bring more cars to the area and without restrictions there is no reason for people not to legally park in the local area stretching the already limited parking to ridiculous levels.	It is noted that there is no CPZ in the Highams Park area. Previous consultation on the introduction of CPZ was not supported by the majority of residents. This matter is noted for further consideration.
2812	Mrs Emily Heap		There is a tendency for newer developments to be 'car free' but this is naive, especially in an area where there is no parking restriction and with near access to the A406. Any new developments should have parking for the flats/houses OR if 'car free' development is insisted upon CPZ needs to be	This point is noted for further consideration. Policy 72 sets out the Council's policy on parking. It supports car free development in the North Area of the borough in locations that are well-connected to public transport, active travel networks, and with other amenities.

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			introduced prior to their building with restrictions on the access to CPZ parking for these developments.	
2813	Mrs Leila Belcarz		I am also concerned that Highams Park will not have sufficient infrastructure to support 450 or more new homes in the area. For instance, the local schools and doctors' surgeries are already heavily oversubscribed and there is a lack of detail in the plan as to, again, how this will be effectively managed in practice. Schools and doctors' surgeries cannot just simply be "made" to accommodate these additional numbers (I suspect this will be impossible in practice due to space constraints anyway) without adversely affecting the quality of services provided, and well-being of existing service users.	The Local Plan will be supported by an Infrastructure Delivery Plan, which will set out details of the borough's infrastructure requirements. This document will set out what is needed, where it is needed and when it is needed. This document will be published with the final version of the plan. Furthermore, Policy 2(c) makes clear that planning permission will only be granted for new development if it can be demonstrated that there is, or will be, sufficient infrastructure capacity to support and meet growth requirements.
2814	Mrs Leila Belcarz		Some areas of Highams Park (e.g. Castle Avenue, Handsworth Avenue and Falmouth Avenue) look very disjointed in places owing to the introduction of newer styles of properties at later stages, without considering the overall look and character of existing properties. How will the council guarantee that the proposed new homes will not further add to this?	The draft Local Plan acknowledges the distinctive nature of the different parts of the borough and sets out a spatial approach that takes account of the unique character of local areas. Policy 21 of the plan seeks to apply place-making principles that reflect the character and local distinctiveness of local areas, particularly taking advantage of the heritage, cultural and green assets.
2815	Miss Sian Edwards		The same feel of Chingford houses should be built not flats. Houses are needed not high rise flats. Total increase to 'new homes' for the area is too high, the area will be over populated causing an increase in crime. Local residents need to be put first. Chingford Hall Estate tower blocks were pulled down, now it seems like we are going backwards.	The concern raised about the impact of growth on local character is recognised - in particular that new development could become inappropriate to the existing local context. The draft Local Plan contains a range of policies to guide growth and change and to ensure that new development is carried out in harmony with its setting and makes a positive contribution to the local environment. See Policy 5 (Approach to Intensification and Policy 62 (High Quality Design) and Policy 63 (Tall Buildings). Other policies also consider amenity and other issues relating to local character. All of these policies are considered in decision making, ensuring that an appropriate balance is maintained between competing objectives and that

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				new development is sensitively designed and community safety issues well managed.
2816	Miss Sian Edwards		Sewardstone is not that near a station - almost a 30 mins walk to station road or ponders ends. So not reasonable without getting a bus - buses do not time well with train timetables - more work is needed with public transport. This should be put in place first before more commuters trying to pack on already busy trains.	The Local Plan will be supported by an Infrastructure Delivery Plan, which will set out details of the borough's infrastructure requirements. This document will set out what is needed, where it is needed and when it is needed. This document will be published with the final version of the plan. Policy 2(c) makes clear that planning permission will only be granted for new development if it can be demonstrated that there is, or will be, sufficient infrastructure capacity to support and meet growth requirements.
2817	Mrs Sarah Sanders	Committee Member DADRA	We do not believe local infrastructure can support this level of development. Schools, doctors and transport links are all already stretched. Crossrail 2 even if approved will not be available before the early 2030's - this is not an appropriate transport solution for the proposed timelines. Congestion on the A110 and Sewardstone Road is already problematic.	The Local Plan will be supported by an Infrastructure Delivery Plan, which will set out details of the borough's infrastructure requirements. This document will set out what is needed, where it is needed and when it is needed. This document will be published with the final version of the plan. Policy 2(c) makes clear that planning permission will only be granted for new development if it can be demonstrated that there is, or will be, sufficient infrastructure capacity to support and meet growth requirements.
2818	Mrs Sarah Sanders	Committee Member DADRA	The level of housing required within the proposed location suggests the need for multiple high-rise developments. This seems at odds with the history and character of the area and its unique balance of nature and the built environment.	The concern raised about the impact of growth on local character is recognised - in particular that new development could become inappropriate to the existing local context. The draft Local Plan contains a range of policies to guide growth and change and to ensure that new development is carried out in harmony with its setting and makes a positive contribution to the local environment. See Policy 5 (Approach to Intensification) and Policy 62 (High Quality Design) and Policy 63 (Tall Buildings). Other policies also consider amenity and other issues relating to local character. All of these policies are considered in decision making, ensuring that an appropriate

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				balance is maintained between competing objectives and that new development is sensitively designed.
2819	Mrs Sarah Sanders	Committee Member DADRA	About focusing new development to the area of Kings Head Hill/Sewardstone Road junction, if development is required in the immediate vicinity it would be positive for this to be focused on these key access roads in the area. But congestion is already an issue on the A110 and Sewardstone Road. Increased vehicle and pedestrian traffic would require better management of the junction. There are already issues with cars entering and exiting locations at this junction - entrances and exits would need to be better positioned and managed.	This point is noted for consideration. The Council is carrying out a transport study, which will inform the development of policy. The Council also intends to discuss this issue with TfL.
2820	Mrs Sarah Sanders	Committee Member DADRA	Parking would be a key concern - with potential impact on surrounding (already congested) roads. Increased congestion on the main routes will increase the use of surrounding roads as a cut through - something that is already an issue with a number of high-speed collisions on small residential side roads.	This point is noted for further consideration. The Council is carrying out a transport study, which will inform the development of policy. The Council also intends to discuss this issue with TfL.
2821	Mrs Sarah Sanders	Committee Member DADRA	About expanding the boundary of Sewardstone Road Neighbourhood Centre, the committee would appreciate clarification on what the expansion of the boundary would mean for local residents and businesses.	This point is noted. Further information on proposed changes to the boundary of Sewardstone Road Neighbourhood Centre will be published.
2822	Mrs Sarah Sanders	Committee Member DADRA	Regarding the statement made to improve public realm and public spaces across the area and walking and cycling accessibility, connectivity, permeability and legibility to Ponders End, North Chingford District Centre and South Chingford / Chingford Mount, as well as other identified routes, this would be a great improvement for the area, but it must be ensured that future accessibility is also inclusive of all for young families with small children and older and less mobile residents.	This point is noted. It is proposed to include a substantive policy on 'access for all' which will acknowledge the needs of young families with small children, older and less mobile residents.
2823	Mrs Sarah Sanders	Committee Member DADRA	Regarding the statement made to apply place-making principles that reflect the character and local distinctiveness of the area, particularly taking advantage of the heritage, cultural and green	This is noted.

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			assets, this is of great importance to the area, especially when considering the design of new homes in the area.	
2824	Mrs Sarah Sanders	Committee Member DADRA	Regarding the statement made to improve the sense of arrival at Sewardstone Road as a gateway into the borough, many of the shops of the centre are now vacant awaiting redevelopment. We and our residents would be delighted to see this area returned to its former glory.	This point is noted.
2825	Mrs Sarah Sanders	Committee Member DADRA	We are concerned that the proposed levels of new housing would require multiple high-rise developments - greatly reducing the current impression of the green and open space afforded by the open views of Pole Hill and the green of Epping forest.	The need to protect strategic views such as the open views of Pole Hill and the green of Epping Forest is acknowledged. Policy 63 on tall buildings acknowledges this point by drawing attention to the impact of tall buildings to the enhancement of townscapes, landscapes, skylines, and preservation of landmarks and views.
2826	Ms Alison Hill		Highams Park is a lovely village still with a growing artiness to it, so new builds should be kept to three storeys only and in keeping with the local look. Chingford Hatch could probably take some new build homes but again these need to be sensitive to the overall look of the area. Improved transport links to the rest of the borough would be useful.	These points are noted.
2827	Ms Alison Hill		Employment improvements along the North Circular would be welcome.	This is noted. The Plan contains policies to promote and managing designated employment areas to secure more jobs for local people. See Chapter 9 - Building a Resilient Economy.
2828	Ms Helen Chilvers		I object to your plan to build over the bus station. If you build over the bus station in North Chingford, you will destroy the beautiful aspect of Epping Forest, especially for people coming out of the station or walking/driving along station road. Many people come by train to Chingford to enjoy the forest and the first thing they will see is an ugly housing development. I can make the same points if you build over the DVLA site. All new buildings must be low and attractive - not ugly square boxes. Building over the bus station will make it less safe for people	The Council is preparing an additional Local Plan document on site specific allocations. This will provide opportunity to apply the policies of the plan on specific sites, providing more details on how new developments could be integrated within existing local areas.

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			and particularly women who wish to wait for a bus. All new building should be restricted to 3 floors to fit in with the height of other buildings in Station Road.	
2829	Ms Helen Chilvers		We already have a lot of empty shops in Station Road, so what is the point of building new ones. You need to fill the existing shops by offering affordable rents to make Station Road a thriving place for businesses. We definitely do not need more shop space.	The plan does not propose to build more shops. Rather it seeks to manage retail change throughout the borough in response to the current challenges facing town centres by encouraging revitalisation, adaptation and regeneration in designated centres and parades.
2830	Ms Helen Chilvers		I object to building over car parks. If people cannot park a car, then the existing businesses will die. People rely on being able to park for a short time to do their shopping and there is currently not enough parking space in Station Road.	The plan seeks to make effective use of previously developed land particularly where land is underused or vacant and it is possible to provide a mix of uses on upper floors. This does not necessarily involve the complete loss of all car parks.
2831	Ms Helen Chilvers		If you change the Assembly Hall/Library and build on it, you will lose this community space which is so important to the residents and, again, you will change the aspect of the Green Area which currently is delightful with open space and character.	Policy 56 seeks to resist the loss of social infrastructure uses including meeting halls.
2832	Mrs Joanne Noakes		Highams Park is already overdeveloped due to all the flats around the Tesco site, Stewardstone Road development would be a nightmare for the surrounding areas. Whilst understanding that the need for new homes in London I feel the plan lacks the insider knowledge of the residents from the affected areas and is not workable.	The Council is preparing an additional Local Plan document on site specific allocations. This will provide opportunity to apply the policies of the plan on specific sites, providing more details on how new developments could be integrated within existing local areas. This document will be prepared with public participation providing the opportunity for resident views to shape the nature and form of development likely to be considered acceptable.
2833	Mr John Avis		The infrastructure (schools, doctors, power supply etc) must be available before or when the need arises and not after the need has arisen.	The Local Plan will be supported by an Infrastructure Delivery Plan, which will set out details of the borough's infrastructure requirements. This document will set out what is needed, where it is needed and when it is needed. This document will be published with the final version of the plan. Policy 2(c) makes clear that planning permission will only be granted for new development if it can be demonstrated that there is, or will

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				be, sufficient infrastructure capacity to support and meet growth requirements.
2834	Mr John Avis		The Council must not give permission (or allow by its inactivity) the conversion of ground floor shops to residential accommodation. This affects the character of Highams Park and reduces the opportunity for local employment.	This point is noted. Policy 49 (G) seeks to ensure that replacement uses are well integrated (in function and design) within existing commercial frontages. The application of this policy will ensure that the conversion of ground floor shops to residential accommodation are well managed in the interest of townscape character and the amenity of neighbouring occupiers.
2835	Mr John Avis		The Council must make parking a requirement of any development. To assume that people won't use cars is naive. Many people, myself included, are too old to ride a cycle or walk very far. Are the disabled and infirm to be confined to their homes? Without adequate parking provision that will be the result. The 15min shoppers free parking should be raised to 30min.	Policy 72 sets out the Council's policy on parking. The policy approach is mindful of the national planning policy requirement to promote sustainable travel modes that limit future car use as well as the London Plan policy to reduce car travel. The policy approach taken seeks to reduce parking requirements in accordance with these policy drivers. The challenges in enforcing car free development and the point made about the provision of shopper free parking is also noted for consideration and discussion with the Parking Control Team.
2836	Mr John Avis		Affordable homes should be given to local people as a priority.	The plan seeks to ensure a significant increase in the supply, choice and mix of high-quality new homes, in particular delivering genuinely affordable homes.
2837	Mr John Avis		The Council should work with the Highams Park Planning Group to implement the neighbourhood plan which it has been developing and take into consideration this plan during the implementation of the LBWF Local Plan.	This is noted. The Council has made a commitment to work with the Highams Park Planning Group to ensure there is a good relationship between the Local Plan and the emerging Highams Park Neighbourhood plan.
2838	Mr John Avis		I support the reply to the Local Plan given to the Council on behalf of the Highams Park Planning Group by Gordon Turpin. After all, the Highams Park Planning Group was established to implement a neighbourhood plan on behalf of the residents of Highams Park.	This is noted. See response to the HPPG (Gordon Turpin).

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2839	Mr Oliver Gover		The principles for the North of the Borough are, broadly, correct. It is already a pleasant area to live with a strong local community so there is little need for greater improvement there. The principles are sound and Chingford already adheres to them: the danger lies in the council breaking these principles through attempting to implement them in a shoddy way.	This point is noted.
2840	Ms Susan Clark		Waltham Forest Council planners seem to think that the Forest starts at Rangers Road and disregard the area of Chingford Plain that runs to Pole Hill, Hawkwood and Yates Meadow. The Forest is very important for the health of all London and the impact of any development on all aspects must be considered. Views across the Plain from Pole Hill towards Rangers Road must be protected, there is already a block of flats (Hadleigh Court) in Crescent Road which intrudes on the landscape and produces a jarring effect. This would certainly be exacerbated if more high rise building were to be encouraged around the rail and bus stations.	The need to protect strategic views such as the open views of Pole Hill and the green of Epping Forest is acknowledged for inclusion in the plan. Policy 63 on tall buildings acknowledges this point by drawing attention to the impact of tall buildings to the enhancement of townscapes, landscapes, skylines, and preservation of landmarks and views.
2841	Ms Susan Clark		The High Street (Station Road) is suffering, partly due to the malaise that is affecting all retail, but also, I would suggest, that potential developers are waiting for the plan in the hopes that any current protections will disappear and there will be a free for all with out of proportion and out of character developments being allowed.	The Council is addressing the challenges affecting its town centres in a number of ways such as through the preparation of town centre strategies and other regeneration initiatives. The Council is working to prepare a High Street Strategy for North Chingford. Further information will be published.
2842	Ms Susan Clark		Station Road needs parking and the suggestion that the Richmond Road car park could provide housing is ridiculous. There is a need to consider the impact of any proposed development on the whole landscape not just its frontage.	The plan seeks to make effective use of previously developed land particularly where land is underused or vacant and it is possible to provide a mix of uses on upper floors. This does not necessarily involve the complete loss of all car parks. The plan contains a range of policies to manage change in local areas. All of these policies will be considered in decision making, ensuring that an appropriate balance is maintained, and problems minimised.

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2843	Ms Susan Clark		The infrastructure of the area is already under strain. The train service is good but public transport links to area on the borders such as Waltham Abbey and the Lea Valley Regional Park are poor, unless there is massive investment in public transport residents in this area will continue to need to travel by car. Anyone whose mobility is impaired has a great deal of difficulty in travelling to our local hospital (at least two buses) by public transport let alone reaching Stratford (one bus at least an hour's journey) where other health facilities are increasingly located.	The Local Plan will be supported by an Infrastructure Delivery Plan, which will set out details of the borough's infrastructure requirements. This document will set out what is needed, where it is needed and when it is needed. This document will be published with the final version of the plan.
2844	Ms Susan Clark		There seems to be a lot of emphasis on things that are not necessarily going to happen e.g. Crossrail. Even housing targets exceed those imposed by the Mayor.	The position regarding Crossrail 2 is noted. The Local Plan looks ahead to the next 15 years so it is necessary to acknowledge and take into account this significant infrastructure proposal, although seemingly uncertain at the present time.
2845	Ms Susan Clark		There are numerous errors in the documents that have recently come to light i.e. "Area Appraisal Plan" and some very odd and confusing statistics. This confirms the impression that the North of the borough is just an adjunct, useful for raising council tax and fines for spurious yellow box junctions, but not worth serious consideration of its needs and the diverse character of its various areas.	The Council notes the error in the growth figures stated. This will be corrected. The draft Local Plan acknowledges the distinctive nature of the different parts of the borough and sets out a spatial approach that takes account of the unique character of local areas and the diverse communities. The policies of the plan are applicable throughout the borough and seek to improve all areas.
2846	Ms Susan Clark		The Council's record in selling off assets that belonged to the area and failing to invest in the area does not encourage any confidence that the plan will be of benefit to the area. This draft document should be subject to ongoing public scrutiny to ensure that the final Plan is much more detailed, considered and appropriate.	The draft Local Plan acknowledges the distinctive nature of the different parts of the borough and sets out a spatial approach that takes account of the unique character of local areas and the diverse communities. The policies of the plan are applicable throughout the borough and seek to improve all areas.
2848	Ms Susan Clark		Don't understand statements such as the following: "To achieve this, the Council is reviewing the integrity of the Green Belt boundaries in the local area with a view to de-designating brownfield land subject to the conclusions of an updated Green Belt Review." on the one hand the plan acknowledges that each	This point is noted. It is proposed to amend/delete this wording for better clarity and interpretation.

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			area is distinct and, on the other hand, seems to be intent on encouraging inappropriate development.	
2849	Ms Susan Clark		The vision looks like a "cut and paste" effort with little or no knowledge of or interest in the area. Elementary errors abound such as the suggestion that Chingford station needs step free access when it is probably the most accessible station on the line.	This point is noted. It is proposed to amend/delete this wording for better clarity and interpretation.
2850	Ms Susan Clark		The improvements to cycling and walking promised previously seem to extend only to providing facilities for cyclists to the detriment of pedestrians.	This point is noted. The plan seeks to provide safe, attractive cycle network also ensuring improvements to the pedestrian environment as set out under Policy 68 (Walking and Cycling) and Policy 67 (Liveable Neighbourhoods for All).
2851	Ms Susan Clark		The proposal to develop on the junction of Kings Head Hill and Sewardstone Road does not seem to have take account of the special status of the reservoirs.	The Council is preparing an additional Local Plan document on site specific allocations. This will provide opportunity to apply the policies of the plan on specific sites, taking into account site specific conditions and providing more details on how new developments could be integrated within existing local areas.
2852	Mr Fabio Cimelli		About achieving a minimum growth targets of 300 new homes for South Chingford /Chingford Mount Strategic Location, I am concerned by the term "minimum" as this leaves the target unlimited/ open to ambiguity.	The growth targets included in the plan is based on evidence from the Growth Capacity Study 2019, which considers the capacity of identified sites in local areas to deliver the proposed targets. This is an indicative target. In considering development proposals, other factors including site specific conditions and the impact on local character also apply. The plan contains a range of policies to guide new development in local areas. All of these policies will be considered in decision making, ensuring that an appropriate balance is maintained between competing objectives - in this case delivering growth and ensuring that new development makes a positive contribution to the local environment.
2853	Mr Fabio Cimelli		About exploring development opportunities at Chingford Overground Station area, we would like to understand what "exploring opportunities" actually means. If one area is to build	The sites mentioned in the document have been identified as examples of under used sites with potential for redevelopment. The Council is preparing an additional Local Plan document on

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			over the Bus station, anything constructed automatically becomes "high rise" regardless of how many stories built. There would be mass opposition to anything being built over the bus station as the logistics involved would be completely out of kilter with the surrounding area. Please can LBWF also confirm that land owned by the DVLA, Mitsubishi Vehicle Showroom and Chingford Golf Club - all in adjacent areas - are not to be considered for any re-development.	site specific allocations. This will identify the full list of sites being considered. This new document will provide opportunity to apply the policies of the plan on specific sites, providing more details on how new developments could be integrated within existing local areas.
2854	Mr Fabio Cimelli		Regarding the need to apply place-making principles that reflect the character and local distinctiveness of North Chingford, particularly taking advantage of the heritage, cultural and green assets, any developments would go against this. I urge dwellings to be considered for construction around the Bus station area to be taken off the table. The area is next to Chingford Plains which is at the very heart of the heritage and character the area is known for and to which this policy was likely written for.	Sites purposely identified for redevelopment as included in the Site Allocations will be carefully selected. A methodology for site selection will be included in the document. Separate consultation on the preparation of the site allocations document will be undertaken.
2855	Mr Fabio Cimelli		As someone who has lived in LBWF most of his life - 46 years and counting - I am familiar with the culture, nature, social make up and fabric of the borough. I was brought up in Leyton and Walthamstow hence speak from experience when expressing these views. North Chingford is unlike other towns in the borough with its almost "suburban" outlook and hence the characteristics are very different. I urge LBWF plans to increase dwellings around the Chingford Station and Chingford Green area to either be removed or kept to a bare minimum. High rise buildings would completely damage the look and feel of the town as well impacting the environment. Concerns also are that car parking would not be available for new residents which would simply move the problem to residential streets. Finally, there are other areas of impact - need for extra school places, GP surgeries, shops, transport, etc. What plans to absorb all this	The concern raised about the impact of growth on local character is recognised - in particular that new development could become inappropriate to the existing local context. However, if well managed, growth could provide positive benefits to improve the quality of local environments. The draft Local Plan contains a range of policies to guide growth and transformation of local areas to ensure that new development is carried out in harmony with its setting and makes a positive contribution to the local environment.

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			would there be and how would all that effect the proposals also?	
2856	Mr and Mrs Richard Cleveland		There is little or no regard for the character of the area which has been deliberately eroded by the policy of impossibly high business rates that make it virtually impossible for small retail outlets to survive. In addition the lip service that is paid to the development of community facilities, such as adult education in the area, is laughable, not to say hypocritical, since is the council that has systematically closed such centres (Louisa Oaks, Friday Hill House) and put money into the hands of developers. The Assembly Hall in North Chingford has been priced out of the reach of local organisations and if one is of a cynical disposition one might see dishonourable intentions behind this. This is not a "vision" it is a fantasy designed to cover the real intention to over develop the North of the borough and put yet more money into the pockets of developers.	The draft Local Plan acknowledges the distinctive nature of the different parts of the borough and sets out a spatial approach that takes account of the unique character of local areas. The distribution of growth in all areas including North Chingford has also been informed by evidence, looking at site specific development opportunities and potential through the Growth Capacity Study and also the Characterisation and Intensification Study, which has considered how new development could be accommodated at the locations where opportunities exist.
2857	Mr and Mrs richard Cleveland		The number of homes proposed for the area is absurdly high. The only way this could be achieved is by building high rise buildings, totally destroying the character of the area. These 'homes' will greatly increase the population and mean that the already dangerous overcrowding on the trains, particularly in the rush hours will become even worse. Promises of extra trains are just that 'promises' and as for a train line that does not yet have funding and will not start being built until 2035! Well, it seems that Boris Johnson and the Conservative Party are not the only people spinning such nonsense.	The concern raised about the impact of growth on local character is recognised - in particular that new development could become inappropriate to the existing local context. The draft Local Plan contains a range of policies to guide growth and change and to ensure that new development is carried out in harmony with its setting and makes a positive contribution to the local environment. See Policy 5 (Approach to Intensification and Policy 62 (High Quality Design) and Policy 63 (Tall Buildings). Other policies also consider amenity and other issues relating to local character. All of these policies are considered in decision making, ensuring that an appropriate balance is maintained between competing objectives and that new development is sensitively designed. The position regarding Crossrail 2 is noted. The Local Plan looks ahead to the next 15 years (up to the mid 2030s) so it is necessary to

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				acknowledge and take into account this significant infrastructure proposal although seemingly uncertain at the present time.
2858	Mr and Mrs Richard Cleveland		The other major transport issue is parking. We are told that these new homes will be built with no parking as Chingford's wonderful transport links and new fantasy railway will mean that people will not need them. I cycled to work in Islington for a large part of my working life, concerned for the environment long before it became politically fashionable but we also kept a car as giving my wife and three children a 'crosse' to collect the weekly shop or carry all the camping gear when we went on holiday proved impossible. Our point is that even if people use bicycles and public transport you cannot legislate against car ownership and people will keep cars and probably park in some nearby street. What about 'Joe Bloggs' who has a small one-person business that requires a van? Drive round North Chingford and look at how proverbial 'white vans' are parked on the street. Oh, CPZs, I hear you say, charge people to park outside their own homes that'll stop it! Except of course for those without parking in their new homes, who cares about them?	Policy 72 sets out the Council's policy on parking. This is mindful of the growth aspirations of the plan, but also takes account of the NPPF policy to promote sustainable travel modes that limit future car use, as also included in the London Plan. The policy supports car-free development in the North Area of the borough in locations that are well-connected to public transport, active travel networks, and with other amenities. The challenges in enforcing car-free development is noted for further consideration.
2859	Mr and Mrs richard Cleveland		The increase in residents will, of course mean an increase in children, unless, of course, sterilisation is prerequisite for having a new home. This means a need for more school places in our already over-subscribed and under-resourced schools. But apparently, according to Cllr Miller, at a meeting we recently attended, it's all going 'to be alright'! Stick a porta-cabin in the playground and take up valuable outside space, convince teachers that it's OK to have a few more children in their class or place the burden on unqualified and under paid classroom assistant OR.... How about virtual schools no human	The Local Plan will be supported by an Infrastructure Delivery Plan, which will set out details of the borough's infrastructure requirements. This document will set out what is needed, where it is needed and when it is needed, also including provision of schools, GP services, etc. This document will be published with the final version of the plan. Policy 2(c) makes clear that planning permission will only be granted for new development if it can be demonstrated that there is, or will be, sufficient infrastructure capacity to support and meet growth requirements.

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			contact, no socialisation, no contact with other cultures, races and creeds.	
2860	Mr and Mrs Richard Cleveland		The suggested theft of open space, including Green Belt land rather than using such land for planting trees and being available for all these new people, especially children, in their cramped and gardenless space, goes completely against the Mayor of London's bold vision for 'A National Park City'. Read it you may learn something.	The plan acknowledges that the projected growth in population and housing demand will increase the importance of improving the provision of accessible open spaces and therefore contains policies to protect and enhance open space provision. See Policies 4(H), 58 (F) and 84 and 85.
2861	Mr and Mrs Richard Cleveland		There is nowhere in this plan that takes account of this expanding populations need for health care. The GP service in the area is already creaking at the seams and the thousands of new people and it is thousands over the next few years, can only make this worse. There seems to be an assumption that by simply lumping all GPs into a multi-doctor health centre it solve all this. A human resource can only be stretched so far, brave words and glossy facilities will not do. In short, the plan is like building a house before putting in the foundations. Poor infrastructure means a poor quality of life for everyone in the area. The addition of these new homes will of course put pressure not only on visible pieces of infra structure, our comments take no account of services such as water, gas and electricity. We were alarmed when a member of the governing body of local secondary school told a local meeting that the schools electricity supply had been inadequate and the school, not the borough, had had to fund raise £120,000 pounds to get their electricity supplier to build an extra sub-station WITHIN THE SCHOOL GROUNDS!	The Local Plan will be supported by an Infrastructure Delivery Plan, which will set out details of the borough's infrastructure requirements. This document will set out what is needed, where it is needed and when it is needed. This document will be published with the final version of the plan. Policy 2(c) makes clear that planning permission will only be granted for new development if it can be demonstrated that there is, or will be, sufficient infrastructure capacity to support and meet growth requirements.
2862	Mr and Mrs Richard Cleveland		The Council's 'vision' for the North of the borough is wholly unattainable and unsustainable and seems to be merely an excuse to build wholly inappropriate 'homes' that will destroy the character of the area and simply put more money into the	This point is noted. In making changes to the draft plan the Council will consider all other views including those shared by other stakeholders, residents, community groups and indeed everyone with an interest in Waltham Forest.

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			pockets of developers. The policy principles for the North of the Borough are wholly inappropriate and have not a shred of socialist principles and regard for the environmental emergency that has been declared by Waltham Forest. Trees not tower blocks! GO AWAY AND THINK AGAIN!	
2863	Ms Ruth Mattison		The increase of population in North Chingford will take away the community feel. The new buildings will change the look and feel of the area, which is generally a leafy suburb. lower density of population.	The draft Local Plan contains a range of policies to guide growth and change and to ensure that new development is carried out in harmony with its setting and makes a positive contribution to the local environment. See Policy 5 (Approach to Intensification) and Policy 62 (High Quality Design) and Policy 63 (Tall Buildings). Other policies also consider amenity and other issues relating to local character. All of these policies are considered in decision making, ensuring that an appropriate balance is maintained between competing objectives and that new development is sensitively designed.
2864	Ms Ruth Mattison		Provide better variety of shops e.g. fewer nail bars, coffee shops, take-aways.	The Council is addressing the challenges affecting its town centres in a number of ways such as through the preparation of town centre strategies and other regeneration initiatives. The Council is working to prepare a High Street Strategy for North Chingford. Further information will be published.
2865	DNC Haines		I would like to see all public services - such as the Hale End library - properly funded and functioning and run as well as possible. We thank the Councillors and all who work to protect or enhance all that is good in Highams Park and in the borough.	This point is noted.
2867	Wendy Holloway		I understand the need to build more homes but it is important that they should be in keeping with the existing area.	This point is noted. The draft Local Plan contains a range of policies to guide growth and change and to ensure that new development is carried out in harmony with its setting and makes a positive contribution to the local environment. See Policy 5 (Approach to Intensification) and Policy 62 (High Quality Design) and Policy 63 (Tall Buildings). Other policies also consider amenity and other issues relating to local character. All of these policies are considered in decision making, ensuring

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				that an appropriate balance is maintained between competing objectives and that new development is sensitively designed.
2868	Wendy Holloway		The infrastructure also needs to develop - particularly another school; transport; medical provision (both local doctor's surgeries and access to Whipps Cross hospital).	The Local Plan will be supported by an Infrastructure Delivery Plan, which will set out details of the borough's infrastructure requirements. This document will set out what is needed, where it is needed and when it is needed. It will also set out the delivery mechanism to ensure the timely delivery of infrastructure. This document will be published with the final version of the plan.

Policy 18: North Chingford Strategic Location				
ID	Full Name	Organisation	Comment	Council (Officers) Response
614	Lucie Warnell		I write with concern about the proposal for such a large amount of additional housing in North Chingford.	The 27,000 Housing figure for the borough is justified by the Strategic Housing Market Assessment that takes into consideration the projected housing need in the borough for the plan period. To accommodate the projected growth effectively, the Council split the borough into three areas (North, South and Central). From this the council has taken the decision to proportionally allocate the housing growth to best align with existing and proposed infrastructure and amenities that will come forward in the plan period.
923	Mr Mathew Frith		Parts 6 and 7: We Support these.	Support is welcomed and this comment is noted for further discussion.
982	Andrew Shaw	Shaws Quality Butchers	I run a family run butchers in Station Road, North Chingford. Shaws Butchers. Please don't use the car park behind me for flats!!!. We need that car park!!	This comment is noted. There are no site allocations in the Local Plan, only general indications. A Site Allocations document will be consulted upon in 2020.

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983	Betty Marrable		If you build over the existing car parks, where would people park? I understand you as a council don't like cars but the majority of voters are car drivers that you can't deny.	The Local Plan reflects the Council's commitment to TfL's Healthy Streets principles and the Mayor's Transport Strategy to provide low traffic liveable neighbourhoods. The Council is committed to the reduction of private car use in the lifetime of this Local Plan. Policy 72 sets out the thresholds for car parking in the bBorough in line with the Intent to Publish London Plan 2019.
1326	Ms Claire Stroud		As a resident of North Chingford, I believe any buildings over 4 storeys would be totally out of keeping with the area. The station forms the entrance to the forest one way and the borough the other and development over it would detract from this.	This comment is noted.
1609	Bob Bennet		Priority 3: Bearing in mind all the railway land at North Chingford Station is used for operational purposes, including recent built facilities for the new '710' trains, it is unclear what development opportunities exist.	Noted for consideration.
1610	Bob Bennet		Priority 4: Should reference also be made to the library itself and should there be proposals to make use of the abandoned public toilets.	Noted for consideration.
1611	Bob Bennet		Priority 6: Chingford Station already has step free access.	Noted, the policy will be updated to reflect this.
1836	Mr John Hugill		It was of great concern that the Assembly Hall or adjacent land may be demolished or restructured to accommodate new homes. The cost of using this facility has greatly increased making it impossible for groups to use. You can than say that it is not used enough to accommodate these new homes. A similar argument for the car park at Richmond Road, which is used a lot. You could increase to cost of parking which would make it too expensive to use, clutter the streets and for then justify building on it. All this would tear the heart out of North Chingford would greatly affect foot-fall for shops which already	The comments made are noted. However, the Local Plan does not allocate sites. The site referred to appears to be drawn from the Area Investment Plan, which was a discussion document not part of the Local Plan.

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			find trading difficult due to high rental charges and only 15 minutes of free parking; the high street could become a “ghost land”.	
1837	Mr John Hugill		The next area covered at the meeting was for the bus terminal to be covered and flats built on top of this - the height of this new building was not specified. What an eyesore for the people adjacent in Beresford Road and the gateway to the forest. There would also be a plan being considered on the opposite side of the road for demolishing the Masonic Lodge, the garage and other smaller buildings and again build more flats. All of this would tear the heart out of North Chingford. It would also seem that this may have an impact on Chingford Plains owned by the Corporation of London. I don't think they would be too keen on that.	The comments made are noted. However, the Local Plan does not allocate sites. The site referred to appears to be drawn from the Area Investment Plan which was a discussion document not part of the Local Plan.
1838	Mr John Hugill		A mention was made of re-designating secondary frontage. I hope that does not mean the shops on the high street converted to yet more flats.	The intention is to promote the growth of non-retail uses that are appropriate in town centres, such as offices, health service uses, etc.
1840	Mr John Hugill		In several places within your document you mention “intensification” what does that mean and where would it occur?	The need for intensification of development runs through the whole Plan as part of an approach to good growth and efficient land use. Intensification will support the sustainability of the built environment by maximising use of existing infrastructure, including de-centralised energy networks, statutory utilities, roads and parks. It also supports the use of existing social facilities, services and amenities such as fire stations, libraries, recreation spaces and schools. It will provide opportunities to integrate housing options for people of all ages and stages of life into established communities and will also help revitalise existing neighbourhoods. Policy 5 describes how intensification involves the development of a property, site or area at a higher density than currently exists, through development, redevelopment, infill and expansion or conversion of existing buildings. This plan does that whilst planning for the optimum

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				amount of intensified good growth and sustainable development supported by the right level of social infrastructure.
1916	Mr Naveen Kanji		I completely reject the redevelopment of the station building or buildings on the car park/access road to the station adjacent to The Avenue. Redevelopment of the station would completely destroy the character of the District Centre and, therefore, would be contrary to the vision of the emerging Local Plan.	The plan contains a range of policies to guide the redevelopment of local areas/sites and to ensure that new development is well integrated with local character. References to sites do not earmark them specifically for development. The Council will be consulting on a Site Allocations document in 2020.
1954	Mr Stephen Kelliher		I am writing to express significant concerns about the proposed local plan for redevelopment in North Chingford. Having attended the local meeting with members of the planning team, I do not believe that the council have taken into account the unique character of North Chingford. North Chingford has a village like feeling and this is something that all residents wish to retain. It is the gateway to Epping Forest and is truly a suburban town, much more so than other areas of the borough including Highams Park and Walthamstow. I do not believe that a similar planning approach can be taken in North Chingford as has been taken in those areas which have seen more. The impact on the characteristics of the town would be negatively affected.	The draft Local Plan acknowledges the distinctive nature of the different parts of the borough and sets out a spatial approach that takes account of the unique character of local areas. The distribution of growth has also been informed by evidence which has considered site specific development opportunities and potential through the Growth Capacity Study (2019) and the Characterisation and Intensification Study, which has considered how new development could be accommodated at the locations where opportunities exist. Clearly, the approach taken will result in uneven spatial distribution of growth as the more sustainable locations with development opportunity areas will attract more development. However, it is expected that the benefits of growth will be shared throughout the borough through growth in employment, housing and infrastructure provision accessed by all borough residents.
1963	Ms Rosa Ruggieri		The area was an area of clean air, traffic or cut through traffic was as little as can be expected, However, now it has increased to a level that a residential area cannot support and the growth of traffic flow proposed will not be able to support it, if the plans go ahead; this will also destroy the surrounding green area and produce more air pollution that should be acceptable. The borough is planning to extend links and increase business opportunities from Enfield through the borough onto Essex, but	The Local Plan reflects Waltham Forest Council's commitment to TfL's Healthy Streets principles and the Mayor's Transport Strategy to provide low traffic liveable neighbourhoods. The Council is committed to the reduction of private car use in the lifetime of this Local Plan. Policy 72 sets out the thresholds for car parking in the borough in line with the Intent to Publish London Plan 2019, which includes the contributions that future development may make in the extension of parking controls in

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			it has not looked at it in its entirety or investigated the effect it will have on local residents. There is so much talk of the environment/air pollution/climate change etc, and how the London Mayor is trying to lower this by whatever means he can (by making money in the process) that London Borough of Waltham Forest is obviously not aware that all three of these factors will affect the residential areas of Kings Head Hill/Sewardstone Road/Drysdale Avenue and other roads leading off Drysdale Avenue. The London Borough of Waltham Forest and Transport for London rather than look at solving a problem that already exists; everyone. working for both organisations think it is easier to increase the flow of traffic and ignore present issues.	the borough. In addition, Waltham Forest Council has commissioned a Transport Study to review current road performance. The Council is committed to working with TfL in order to deliver public transport improvements with the aim of producing environment and climate benefits.
1992	Louise Croucher		Development in the North Chingford Strategic Location over the Plan period will deliver the following priorities: 1. Achievement of minimum growth targets of 300 new homes; TOTALLY AGAINST THIS.	This comment is noted.
1993	Louise Croucher		3. Exploring development opportunities Chingford Overground Station area; HOW CAN YOU DEVELOP THIS - THERE ISN'T ENOUGH ROOM.	The Local Plan acknowledges the role of small sites in contributing to housing needs throughout the borough. It reflects the emerging London Plan (Policy H1) requiring boroughs to optimise the potential for housing delivery on all suitable and available brownfield sites, especially sites with existing or planned public transport access levels (PTALs) 3-6, or that are located within 800m distance of a station or town centre boundary.
1994	Louise Croucher		5. Establishment of a primary shopping area within the District Centre boundary and the de-designation of the existing secondary frontage. Application of a flexible approach to changes of use (involving A Class Uses) outside the designated primary shopping area. (See Chapter on Distinctive Centres and High Streets); SHOPS ARE CLOSING SO QUICKLY DUE TO HIGH	This comment is noted. Rates and parking charges are out with the scope of the Local Plan

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			RATES COSTS AND WITH CHARGING FOR PARKING LOCAL PEOPLE ARE NOT BEING ENCOURAGED TO SHOP IN THE AREA.	
2023	Mr Mike Souch		Station Road North Chingford is held in the affection of North Chingford residents and visitors to the area alike. It has managed to retain its 'Village' look and atmosphere for many many decades and serves as the borough's gateway to the forest. Innumerable passengers have enjoyed the pleasure of walking through the station on a sunny day to see Chingford plains to their right. It is unique, a special place, that is there for the pleasure of all the borough's inhabitants. It now seems though that this is all about to change, for the worse, with the building of high rise developments around the station and in its environs. We all realise that people have to have somewhere to live, but insensitive development will ruin an asset for the whole borough.	Noted for consideration.
2027	Mr Mike Souch		Station Road consists of individual shops whose existence is under threat from high rates and now a disastrous non parking initiative. What are you thinking? You are charging £3 per hour to park in the street and are planning to build on all of our car park space. Contrary to your published view that 79% of people in North Chingford have lived in the area for only five years or less, everyone knows that the area has an older population that have lived here for years. Station Road consists of individual shops whose existence is under threat from high rates and now a disastrous non parking initiative. What are you thinking? You are charging £3 per hour to park in the street and are planning to build on all of our car park space. Contrary to your published view that 79% of people in North Chingford have lived in the area for only five years or less, everyone knows that the area has an older population that have lived here for years. You say that by ridding us of our parking facilities will make it easier for	It is recognised that intensification could be associated with concerns about new development becoming inappropriate to their context and destroying much of what people see as valuable in their daily living environments. However, if well managed, intensification could provide positive benefits to improve the quality of local environments. The Local Plan reflects Waltham Forest Council's commitment to TfL's Healthy Streets principles and the Mayor's Transport Strategy to provide low-traffic liveable neighbourhoods. The Council is committed to the reduction of private car use in the lifetime of this Local Plan. Policy 72 sets out the thresholds for car parking in the borough in line with the Intent to Publish London Plan 2019, which includes the contributions that future development may make in the extension of parking controls in the borough.

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			people to walk or use bikes, this is ridiculous. It is not flat Holland, it is very hilly Chingford, to see someone of any age on a bike here is a very rare occurrence, to see an elderly person on a bike is non-existent. Not because they do not want to ride but because they are unable to. Riding for leisure is no bad thing but for the conveyance of shopping bags it is plain dangerous. You tell us that it is not nice to see empty shops, your intentions will ultimately kill off our local shopping asset. You are trying to condense it to nearly nothing so that you can cram in more residential development - you are not thinking of the existing residents, it seems that you are only concerned with quotas and money. Killing off our parking will mean that people will not shop here, they will go to retail parks or be ordering their shopping to be delivered, involving more vans on the road, which I would have thought is the opposite of what Sadiq Khan is telling you to do.	
2028	Mr Mike Souch		What are you going to do with our library and assembly hall? At the moment you have priced out the local users and say that it is under used. We all fear that your plans for our area are designed to deliberately change the Character of North Chingford, is this the case?	The Local Plan does not allocate sites as this will be the subject of a Sites Allocation document which will be consulted in 2020. The library and Assembly Hall are not affected by either document.
2030	Mr Mike Souch		A large scale development of residential units will put a burden on local services, such as schools and doctors, which are already over subscribed, and the non existent car parks will make it very difficult for Mums to drop off or pick up their young children at school - how does this work?	The Local Plan will be accompanied by an up to date Infrastructure Delivery Plan when it is published for consultation in 2020. The IDP will outline the need for schools and health services and how such needed will be met through development
2148	anonymous response form 2		The plan is really about how we can cram hundreds more home into our areas as it is mandatory government policy.	The Local Plan is the council's response to identified local need in relation to targets set at regional and national level.
2149	anonymous response form 2		We accept there are limited opportunities for improving the environment but there are inevitably a secondary conversation - if agreed by developers.	This comment is noted.

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2150	anonymous response form 2		We want to see the "character of North Chingford" document referred to but not available.	The Characterisation and Intensification Study (2019) can be found on the Planning Policy evidence base section of Waltham Forest Council's website.
2154	anonymous response form 3		N. Chingford needs - high quality developments to allow existing residents who won't leave the area (and I mean won't!) to downsize but still have access to forest/clubs/churches/station. This would free up the larger owner under occupied houses is "natural" turnover. Note many are pet owners.	This comment is noted.
2161	anonymous response form 3		Station Road needs an update. More facilities (e.g. bin collections) for people living over shops.	Noted. This is an operational matter outwith the scope of the Local Plan.
2162	anonymous response form 3		No development over existing 3 storey frontages.	The Characterisation and Intensification Study (2019) has considered how new development could be accommodated at different locations throughout the borough. The draft Local Plan contains a range of policies to guide the redevelopment proposals. This includes a policy on tall buildings.
2163	anonymous response form 3		Maintain open Chingford Plains visitors.	This comment is noted.
2164	anonymous response form 3		No loss of anything green. Why are Mansfield Park, Simmons Lanes Park, Chase lane etc parts not listed or maps?	The Local Plan does not propose the loss of green or open spaces.
2166	anonymous response form 3		The town centre needs a spruce up and we need to encourage visitors to the View, Connaught waters/Butlers Retreat/Holly Trail bikes etc which would in turn encourage Station Road footfall.	This comment is noted for further discussion with Corporation of London/Conservators of Epping Forest.
2169	anonymous response form 3		The parking policies are detrimental to Station Road. Commuter parking is restricting customer access to daytime parking in roads surrounding Station Road.	This comment is noted.

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2278	Christine Guy		How would you characterise the key challenges which face this area? The pressure to build or 'infill' in the small areas seen as possibilities for housing.	The Local Plan must be in general conformity with the London Plan. The London Plan sets a housing target for the whole borough. The Housing Target is split between large sites and small sites (25 homes or less). The Council is required to deliver housing in accessible locations near public transport, which may include 'infill' sites.
2279	Christine Guy		How would you characterise the key challenges which face this area? Challenges with the shopping area - losing the variety - and filling up with eating venues - take away, coffee shops, etc and losing the more individual shops.	The Retail Study shows that shoppers visit the centre mainly for top up food shops rather than other retail. The centre has low commercial growth potential, mainly in part to the very local catchment area of the centre.
2280	Christine Guy		How would you like to see this area change? To become more attractive to individual commercial businesses or to involve those businesses with the community. This does not happen if you have chain shops who could monopolize the aspect of the area, but ignore local needs.	The Council notes the impact of changing habits of consumption on High Streets across the borough and proposes policies intended to promote more flexibility in the borough's high streets.
2281	Christine Guy		North Chingford has always had a 'village' atmosphere in the past. It is noticeable that over the years the family run shops and businesses have gradually disappeared. Some that have remained are valued by the locals, but slowly they are likely to diminish as the incoming trade consists of nail bars, coffee shops, take-aways and restaurants, non of which display interest in local affairs or the community.	The Council notes the impact of changing habits of consumption on high streets across the borough and proposes policies intended to promote more flexibility in the borough's high streets.
2313	Mike Chrimes		There is talk of sensitively designed tall buildings at the bottom of Kings Head Hill, but no account is taken of the likely cost of foundation works so close to the reservoirs, existing traffic congestion at the junction, causing in turn a rat run to develop along Drysdale Road, the capacity of Yardley Lane primary school to absorb more children, and the irregularity of the bus services consequent on traffic congestion in the rush hours.	These comments are noted. The plan makes no site allocations at this stage and the feasibility issues raised in this response would require further consideration between Waltham Forest Council, any potential developer and other stakeholders.
2327	Mike Chrimes		The boundary of the zone should be redefined to include all of the conservation area around Chingford Green, and the corridor from the Kings Head Pub along Kings Road to include the two	This comment is noted with reference to the review of the borough's conservation areas.

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			parades of shops, the two primary schools, Catholic Church and vicarage.	
2328	Mike Chrimes		The separate characterisation's study suggests that the types of development spoken of beside the railway station would be totally out of keeping with what is essentially a late-Victorian / pre-war shopping centre interspersed with some housing, and some generally badly designed post war retailing office developments. The brief document itself has an inherent contradiction in between sensitive development and intensification around the station. The aim of the development plan should be to attract high quality architect led developments to live up to the gateway to the Forest tag, and sit alongside the work of Pugin. The existing station forecourt should be regarded as a feature.	This comment is noted.
2345	Mike Chrimes		A study should be initiated to inform what kind of homes are required. The older population profile of the area would suggest that more accommodation for older people near the shops would-be attractive, freeing family homes in the area. Tall buildings should be ruled out and a maximum of four stories maintained as a consistent skyline.	The Characterisation and Intensification Study (2019) has considered how new development could be accommodated at different locations throughout the borough. The draft Local Plan contains a range of policies to guide the redevelopment proposals. This includes a policy on tall buildings.
2346	Mike Chrimes		For it to be an attractive transport hub more needs to be done to improve connectivity with routes to Chingford Mount and Sewardstone Road.	The issues regarding transport and connectivity are noted. The Council will continue to work in partnership with TfL in developing appropriate sustainable transport policies that will assist in improving Waltham Forest's bus and rail network.
2384	Mike Chrimes		While agreeing about the opportunities presented by the Assembly Hall, Post Office and Masonic Hall sites, they all require proper planned consultation as poor planning would cause widespread local resentment. The loss of a post office sorting office for parcel collection as an example. The odd fellows hall and assembly hall are two of the few examples of architect designed buildings in the North of the Borough.	The Council will consult on its Site Allocations document alongside the Local Plan consultation planned for the summer of 2020. In the meantime, these comments are noted.

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2389	Mike Chrimes		Improving access to the Forest seems the game changer for North Chingford. Promoting it as a destination with lots of cafes and restaurants and getting local businesses on Board is a great opportunity, it would also possibly help tempt new quality retailers in to the area. Simple maps showing the shops at the station and bus terminus would help, and proper crossings into the forest from the station and station road are another no brainer.	This comment is noted for further consideration noting the strategic policies for the area and the general thematic policies in the Local Plan.
2391	Mike Chrimes		The potential for 'hipster venues' in Station Road and at Highams Park is currently not being met. Music, art and craft beer (now planned at HP) and wines are a growing market proving appealing in the south of the borough but barely met in the north.	This comment is noted for consideration.
2393	Mike Chrimes		Transforming both Chingford and Highams Park stations using the existing buildings as a start, with bars, specialist and display areas seems a no brainer and a development the freeholders would probably welcome.	This comment is noted for consideration.
2401	Ms Patricia Braga		The area of North Chingford is being ruined. It needs to be upgraded.	These comments are noted. Policy 18 makes specific reference to the protection of the Conservation Area and applying development principles in accordance with the character and local distinctives of North Chingford.
2412	Mr Roger Brown	Chair, Love North Chingford	The North End of Station Road. At the meetings and in the AIP (sites described as 'game changer') the development of a 'build over' at the bus station was justified as currently an eyesore. Whilst this is true, it's no planning justification for a medium rise visually intrusive development at this key site, and certainly not just to take advantage of TFLs desire to dispose of property. This is a major interchange and any disruption or development has to be very carefully considered in context. Last Sunday there were 11 buses waiting in it. The AIP also misses out several of vital bus routes such as the 97, underestimating its interchange value.	This comment does not refer to the Local Plan nor any of its policies. Whilst North Chingford is a Strategic Location as set out in Policy 18, and reference is made to exploring opportunities in the area of Chingford Overground, there are no site allocations in the Local Plan. We will be consulting on a Site Allocations document alongside the Local Plan in 2020.

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2415	Mr Roger Brown	Chair, Love North Chingford	Assembly Hall and Library: Reduction of any community use there is universally rejected in North Chingford. Some sensitive improvement and re development in nearby sites is probably welcome. The library is omitted from the plan policy and should be reinstated. The Council should work with the community over this sensitive site to achieve support and enhance its function.	Chapter 12 of the Local Plan includes libraries as a form of social and community infrastructure. Policy 56 of the Local Plan sets out Waltham Forest Council's position regarding the protection social and community infrastructure.
2444	Emma Bigham		I'm writing today to put forward my concerns about the plans to change North Chingford. My concern is that there is no limit to how tall the new builds will be. NC is a gateway to Epping Forest and has lovely views towards the forest from the high street, also the view back from the forest and Chingford plains is a nice gradual view of even height buildings with no eyesores sticking up above the horizon. If there is no limit then there will be no concern as to these views as developers will seek to gain maximum profit and therefore maximum height. Please consider these issues when you are making your decisions.	The Strategic Location Policy for North Chingford aims to build on the character of the area and aims to enhance and support it. The design and heritage policies in the Local Plan also have a strong focus on enhancing and retaining character.
2456	Daf Bergin		I would object to any buildings over the height of the present buildings on Station Road. Three storeys are high enough for this village feel London Village.	The Characterisation and Intensification Study (2019) has considered how new development could be accommodated at different locations throughout the borough. The draft Local Plan contains a range of policies to guide the redevelopment proposals. This includes a policy on tall buildings.
2457	Christine Foster		I was unable to complete my comments on your web site for the draft local plans. Although I do not live in Highams Park I use the area a lot as I live the other end of Winchester Road which comes under E17. I have read quite a lot of this document and, in particular, items relating to Highams Park. I wish to make comments on the details shown at Hale End Library and details that were discussed on 17 September 2019 at St Peters & Pauls Church E4. Your proposals for the Highams Park areas will destroy the community spirit in the area and a very pleasant environment it has feeling of being in a village,	The Strategic Location Policy for Highams Park aims to build on the character of the area and aims to enhance and support it. The design and heritage policies in the Local Plan also have a strong focus on enhancing and retaining character.

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			what you are proposing will turn the area into a "TOWN" with all the problems that brings. You are going to take away the Character of the Area.	
2575	Anne Hamshaw		Station Road North Chingford is not easy for parking, very little is available, especially school times, when side roads become overwhelmed with parking, our road included.	The parking situation on Station Road, North Chingford is noted. It is also noted that car ownership is a key determinant of transport choice and car use across London. In accordance with the Mayor's Transport Strategy, effective management is essential to reduce private car travel, and realise the health and wellbeing benefits of improved air quality, decreased noise disturbance and local congestion, and increased physical activity. The Council's policy approach on parking is set out under Policy 72.
2577	Anne Hamshaw		Since the disappearance of the car park at Chingford Station the new parking space seems to be the forest land by Chingford Golf Course. This is not environmentally or socially friendly for those who wish to park and walk each day.	It is noted that car ownership is a key determinant of transport choice and car use across London. However, effective management is required in accordance with Mayor's Transport Strategy to reduce private car travel and realise the health and well-being benefits of improved air quality, decreased noise disturbance and local congestion, and increased physical activity. Policy 68 (Managing Vehicle Travel Traffic) sets out Waltham Forest Council's policy approach.
2580	Anne Hamshaw		We already have empty commercial premises, and many trading estates. Building more makes it a commercial environment that is not friendly to the environment. They bring more lorries and larger vans to the area. All our commercial buildings do not appear to be aimed at the community.	Noted for consideration.
2581	Anne Hamshaw		Other services such as police, hospitals and doctors' surgeries which we do not have enough of will totally be overwhelmed.	The Local Plan will be supported by an Infrastructure Delivery Plan, which will set out details of the borough's infrastructure requirements. This document will set out what is needed, where it is needed and when it is needed. It will also set out the delivery mechanism to ensure the timely delivery of infrastructure. This document will be published with the final version of the plan. Policy 2(c) makes clear that planning

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				permission will only be granted for new development if it can be demonstrated that there is, or will be, sufficient infrastructure capacity to support and meet growth requirements.
2621	Emma Bigham		My other concern is that the infrastructure will not be considered before or during the new builds and that flats will be built before the infrastructure will even be put in place, if it ever will be, making it too late for our, already bursting at the seams, doctors surgeries, hospitals, schools etc. to accommodate the new residents in the area (as has already happened in Highams Park which should not be repeated). Please consider these issues when you are making your decisions.	The Local Plan will be supported by an up to date Infrastructure Delivery Plan in line with the requirements of the NPPF (2019) and the Intent to Publish London Plan 2019. This document provides a framework for how the requisite infrastructure will be funded and located in order to deliver the growth required in the Local Plan.
2625	Miss Joanna Moncrieff		Building on the car parks in North Chingford will also have a detrimental effect on the local shops. There are already many empty shops - probably 10% and many of our good local shops have already been forced out because of the parking restrictions. We already have good public transport links in Chingford - trains every 15 minutes and numerous buses - but the shops are still closing. It is the lack of parking which is forcing shops to close. Please reconsider this or we will end up with even more empty shops.	This comment is noted for further discussion.
2640	Christine Foster		The infrastructure of the area, especially doctors and schools which cannot cope now and transport cannot possibly sustain these proposals.	The Local Plan will be supported by an up-to-date Infrastructure Delivery Plan in line with the requirements of the NPPF (2019) and the Intent to Publish London Plan 2019. This document provides a framework for how the requisite infrastructure will be funded and located in order to deliver the growth required in the Local Plan.
2641	Christine Foster		With more housing being proposed in Chingford, the Chingford to Liverpool Street Line will not cope, passengers getting on at Highams Park will struggle to get seats and as it progresses down the line it will be far worse.	The issues regarding transport infrastructure in the area are noted. The Council will continue to work in partnership with TfL and other partners where relevant in developing appropriate sustainable transport policies that will assist in improving Waltham Forest's bus and rail network

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2642	Christine Foster		You are turning this borough into a Mini NEW YORK with high rise and in your own words "HIGH DENSITY" accommodation "tomorrow's slums". In other Councils across the country that have High Rise Blocks they are pulling them down - where as you propose to go up. The height of the building you are proposing for the Highams Park Area is not in keeping with the area and we will lose our close community feeling.	The Local Plan is informed by the Characterisation and Intensification Study (2019), which proposes a variety of typologies and design solutions to achieve Waltham Forest Council's aims. These do not necessarily rely on the need to build significantly higher than is presently the case.
2643	Christine Foster		You are encouraging property speculators to buy the properties and let them out at Astronomically High Rents. They are not affordable for local residents. Social Housing is very low on your Agenda. How will what you propose help the needy and homeless? In fact I would go as far as saying this borough is doing "Social Cleansing" moving people that need social housing out of the borough up north - away from families and friends and schools where children are established.	Chapter 8 of the Local Plan sets out in policies 23-36 inclusive. These policies address Waltham Forest Council's strategic aim of providing a significant increase in the supply, choice and mix of high-quality new homes with the delivery of genuinely affordable homes a particular priority. It is a stated aim of Waltham Forest Council to enable and encourage residents to stay in the borough in order to strengthen communities.
2644	Christine Foster		All you are interested in is Money from Developers and all Waltham Forest Council Tax you will get back from all the flats - where is that going? Certainly not in keeping our streets clean - unless of course you live in Walthamstow Central.	Chapter 20 of the Local Plan (when read with the planning Obligations Supplementary Planning Document and Waltham Forest Council's CIL Charging Schedule) sets out how planning obligations are established and where contributions arising are spent.
2645	Christine Foster		We fought tirelessly to keep our public library which could be used for more community events and now you plan to destroy it for YET MORE Flats.	There are no site allocations in the Local Plan so this comment cannot be substantiated.
2650	Mr Roger Brown	Chair, Love North Chingford	North Chingford Centre policy seems driven principally by increasing housing intensification, with no mitigation, particularly as we understand that CIL is to be used elsewhere. Evidence base for this intensification pressure is largely absent.	The approach to intensification as included in the draft Plan has been informed by evidence - the Characterisation and Intensification Study (2019). The concerns expressed about new development becoming inappropriate to their context and destroying much of what people see as valuable in their daily living environments in noted. However, if well managed, intensification could provide positive benefits to improve the quality of local environments. The plan contains a range of

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				policies to guide and manage change in local areas including North Chingford Centre.
2769	Daf Bergin		While you think we need extra homes with people all working at home in them, it's not a reality for my family who work outside the home. There is nothing, about their jobs that can be done from home, and they already have to struggle with the train, plus no service at weekends for weeks, with buses full. More people will cause more chaos. Put on more busses better routes.	The issues regarding transport are noted. The Council will continue to work in partnership with TfL in developing appropriate sustainable transport policies that will assist in improving Waltham Forest's bus and rail network.
2770	Daf Bergin		Station Road shops. You said 5% were vacant. Wrong, it's 10% . No wonder when parking is for 15 minutes only, it only gives us time to get to one shop. Please increase to 30 minutes free parking. What is your plan about more jobs and more shops?	Local Plan Chapter 9 policies 37-44 refer to jobs and Chapter 11, policies 48-53 refer to retail and high streets.
2771	Daf Bergin		Please don't close the car park at the Co-Op.	There are no site allocations in the Local Plan. We will be consulting on a Site Allocations document alongside the Local Plan in 2020.
2772	Daf Bergin		I have never got over you closing Larkshill open air swimming pool and replacing it with the tubes, which were closed for danger, and then the current pool being put in its place. You should have left well alone and let the open pool remain, for goodness sake we live beside the forest and nature, we choose this over concrete.	This comment is noted with reference to build leisure facilities in the borough.
2773	Daf Bergin		Will all you building be eco friendly, with seedam roofs, heating systems that rely on wind or solar power? Or are you going to cause more emissions? I watch Grand Designs and have seen many great ideas about how not to destroy the planet during a build. I hope you will take that into consideration.	In line with the London Plan, the Local Plan contains commitments to increase the level of urban greening and to improve the quality and extent of green infrastructure in the borough.
2878	Betty Marrable		I'm also a commuter and am obviously concerned about the impact this will have on Chingford trains. By the time the train gets to Highams Park it's fit to bursting. Where on earth is the infrastructure to facilitate all of this?	The issues regarding transport are noted. The Council will continue to work in partnership with TfL in developing appropriate sustainable transport policies that will assist in improving Waltham Forest's bus and rail network.

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2879	Betty Marrable		Question: Do any of the councillors/planners actually live in North Chingford therefore able to give a true feeling of this lovely community?	This draft Plan has been published for consultation to allow all stakeholders, residents, community groups and indeed everyone with an interest in Waltham Forest to comment on the document at the same time before the plan is finalised. This is to allow opportunity for community views to be considered.
2880	Mr Roger Brown	Chair, Love North Chingford	We strongly suggest that to ensure the essential characteristics are retained that an upper limit be 150 units in our district centre. As we speak, planning permission for intensification is being granted for flats over and behind shop and business units, which seems an organic and sustainable way of intensification, and more are in the pipeline. In AIP and Plan at 'game changer' sites overdevelopment is justified by supporting town centre footfall in some way. In reality, this will be occupied by commuters, and will make a vanishingly small contribution in a catchment of over 30,000 people. We also suggest that new development by Community Land Trusts be considered, rather than speculative buy-to-let.	The Housing chapter has a specific policy for community-led housing, which includes Community Land Trust.

Policy 19: South Chingford / Chingford Mount Strategic Location				
ID	Full Name	Organisation	Comment	Council (Officers) Response
924	Mr Mathew Frith		Part 7: We support this.	Support is welcomed and this comment is noted for further discussion.
1010	Lauren Laviniere		Policies 18, 19 and 20 - these do not seem to be very spatially distinctive given that the centres are very different places with different development opportunities. Is there evidence base to inform these policies or a way to better communicate the distinctive opportunities (such as an inset map). It would also be helpful to point to the reference(s) and evidence base which pick up on the place making principles that should be	This point is noted. It is proposed to revise these policies to better reflect the local distinctiveness of these places/centres.

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Policy 19: South Chingford / Chingford Mount Strategic Location				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			considered i.e. are there character or design studies that look at what makes different areas locally distinctive?	
1446	Colin Setchfield	The Parish Church of Saint Edmund	Do the 200 new homes exclude those already identified under current planning applications?	The figure is a forecast and would exclude existing permissions.
1447	Colin Setchfield	The Parish Church of Saint Edmund	Are any of these sites listed below being considered for housing of higher density or buildings taller than others within the District Centre, or has LBWF identified any of these as potential sites for these? a. 53-59 Old Church Road - under current Planning Applications (150588, 163060, 163214, 163950) this is due to a part 3 and part 4 storey building comprising 9 flats; is this still the intention or LBWF's plan? b. 5 Old Church Road and neighbouring Brownfield site at 1A Old Church Road c. Brownfield site on the east side of Churchill Terrace - if so does LBWF plan for this to take advantage of any of the shop fronts adjoining it on Old Church Road (nos 22-54 inclusive)?	There are no site allocations in the Local Plan. The Council will consult on a Site Allocations document in 2020. Where reference has been made above to current or past applications, it should be noted that the figures contained in the Local Plan are in addition to the existing development pipeline.
1448	Colin Setchfield	The Parish Church of Saint Edmund	What is meant by "cultural heartspace"? The only reference to this term on a Google search is its use for Chingford Mount in the Local Plan. Is this cultural heartspace something that currently exists or something which LBWF wishes to grow?	The term refers to the potential that Waltham Forest Council has identified in this area to promote a central focal point for cultural activities. As such it something that Waltham Forest Council wishes to cultivate in the area.
1449	Colin Setchfield	The Parish Church of Saint Edmund	Current "night-time use" relates to eating and drinking establishments, what additional night-time use does LBWF envisage? Is this more restaurants and licensed premises, and if so how does this relate to the concept of "cultural" heartspace?	Later-day/night-time uses offer considerable potential to extend uses to include cultural activities, for example music.
1450	Colin Setchfield	The Parish Church of Saint Edmund	We are keen that accessibility to the Meridian Water development is investigated, as part of this is located within our parish. What plans or proposals are currently in place?	Noted, Waltham Forest Council will be undertaking a masterplan of the area which will consider how access to Enfield could be improve.
1451	Colin Setchfield	The Parish Church of Saint Edmund	This policy references "the character and local distinctiveness of the area" as well as taking advantage of its "heritage" assets. Though this sounds positive, we are uncertain what it means. Please define how Chingford Mount has a distinct character and	Noted for consideration.

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Policy 19: South Chingford / Chingford Mount Strategic Location				
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			what that is, and which heritage assets are being considered and for what purpose.	
1452	Colin Setchfield	The Parish Church of Saint Edmund	The four primary schools in this area (Chase Lane, Larkwood, Ainslie Wood, and Chingford Hall) and local medical facilities are already overstretched; these will need to be addressed with an increased local population.	Noted for consideration. The Council is preparing an Infrastructure Delivery Plan, alongside the Local Plan, which will set out the infrastructure requirements, including schools.
1502	Helen Monger	London Parks and Gardens Trust	LPGT welcomes the term "heritage, cultural and green assets" eg in Policies 6, 18, 19, 20, 21 and feel that this captures the spirit of good design. This term should be applied elsewhere in the plan to ensure all development meets this criteria.	Support noted.
1768	Wendy Mathers-Ford		I would be grateful if you could take the attached Highams Park Planning Group document into account as representing my views in relation to the recent consultation. In summary my concern is predominantly that the Highams Park and South Chingford areas fundamentally lack the infrastructure to cope with several hundred new houses in particular the availability of school places, nursery places, doctors and dentists. Moreover high density living is out of character with the existing housing stock.	This comment is noted. The Local Plan will be accompanied by an up-to-date Infrastructure Delivery Plan when it is published for consultation in 2020. The IDP will outline the need for schools and health services and how such needed will be met through development.
2305	Mike Chrimes		This section was drafted before the commissioned study was available. One has to question how a draft plan can be drawn up without the associated studies being available to both the planners. It also made it difficult for consultees to comment until late in the day	This comment is noted.
2321	Mike Chrimes		Lack of access to rail transport either on the Lea Valley lines or Chingford lines is glossed over.	This comment is noted.
2322	Mike Chrimes		Higher density housing is discussed, but no attention paid to how such residents will park their cars, or find school places is offered. However, compared to sites at Highams Park and	The Local Plan reflects Waltham Forest Council's commitment to TfL's Healthy Streets principles and the Mayor's Transport Strategy to provide low traffic liveable neighbourhoods. The Council is committed to the reduction of private car use in the

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			Station Road it could be argued the would be less damaging to the existing character.	lifetime of this Local Plan. Policy 72 sets out the thresholds for car parking in the borough in line with the Intent to Publish London Plan 2019. Demand for schools' places is addressed in the Infrastructure Delivery Plan that will accompany the regulation 219 consultation version of the Local Plan.
2323	Mike Chrimes		The vacant lots at the Templeton Avenue junction and the fire ravaged Poundland, and the proliferation of fast food venues and betting shops all bear witness to the failures of existing planning controls and development plan to shape an attractive centre. There is nothing concrete in the new plan to suggest matters will improve. Building tall on existing poor quality post war building sites will not necessarily make it an attractive place. An overview of planning the whole centre might enable this to happen.	The Local Plan sets out a vision for the three main parts of the borough and the areas within them. Details will follow on from the Sites Allocation document due for consultation in 2020.
2326	Mike Chrimes		The fate of the tower blocks on the Chingford Hall estate is instructive. In that context the suggestion of infill on that estate, where a great deal of care and consultation and care was taken involving local residents in the present layout does not augur well. It would seem that the words and promises of one generation of planners are going to be reversed by the next.	This comment is noted.
2353	Mike Chrimes		How have the boundaries been set? Moving south towards Walthamstow there are retail and business units almost all the way.	Presently the boundaries remain general in order to prompt discussion. As the Site Allocations document moves through consultation in 2020, these boundaries will be defined accordingly.
2354	Mike Chrimes		How have the boundaries for house prices, employment, school age children etc been set.	Where Waltham Forest Council publishes detail on demographic matters it can be found here at: https://walthamforest.gov.uk/content/statistics-about-borough
2355	Mike Chrimes		Why has the South Chingford Hub site been omitted? It is of considerable controversy locally, with various disputed claims about promises undertaken. It is the only community centre locally.	This comment has been noted for further discussion.

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ID	Full Name	Organisation	Comment	Council (Officers) Response
2356	Mike Chrimes		National retailers etc views seem of importance given the significance of the Sainsbury's and ICELAND/Superdrug sites. Barclays have just reinvested heavily at their Mount outlet, and Santander have kept their branch open there. Is there an explanation?	The Council does not hold records regarding the profitability of any site for its operator.
2357	Mike Chrimes		What proportion of users of the Mount drive/walk and is this different from the other centres? What is the level of car ownership?	Where Waltham Forest Council publishes detail on demographic matters it can be found here at: https://walthamforest.gov.uk/content/statistics-about-borough
2359	Mike Chrimes		How do local communities view the Mount?	Where Waltham Forest Council publishes detail on demographic matters it can be found here at: https://walthamforest.gov.uk/content/statistics-about-borough
2360	Mike Chrimes		The opportunity sites at the Mount omit the vacant lot at the junction of Templon Avenue, and that on the corner of New Road, and the state of the Poundland site.	The Council closed its call for sites in December 2019. We will be consulting on a Site Allocations document alongside the Local Plan in 2020.
2361	Mike Chrimes		The Sainsbury car park is regarded as an opportunity site; how has revenue been affected by free parking at all the other large stores in the area; has shop revenue fallen over the last decade. Can any redevelopment permit drop off and pick up alongside the store.	Comments regarding parking are noted. The Council does not hold records regarding the profitability of the site for its operator.
2362	Mike Chrimes		The areas to the rear of Old Church Road properties are also opportunity areas.	This comment is noted.
2363	Mike Chrimes		The statistics for school age children and income suggest the area is full of low income families has this been built into the plan correctly?	The Local Plan will be accompanied by an up-to-date Infrastructure Delivery Plan when it is published for consultation in 2020. The IDP will outline the need for schools and health services and how such need will be met through development.
2364	Mike Chrimes		What is the likely impact of Brexit, a quick survey suggests of 40 businesses open around 7pm 80% plus are 'immigrant' run - the exceptions are betting shops	Brexit is a process that will unfold over time. Its impacts will most likely be apparent at the time that the Local Plan will be at its first post-adoption review.

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2366	Mike Chrimes		Provision for cyclists is poor; there are few parking bays for them and no recognition of the fact cyclists come down the hill generally more quickly than traffic, whilst going back up the Mount cars park near the summit which is the worst place for cyclists. An alternative route up Hurst Avenue is difficult because of traffic volume.	The issues regarding transport are noted. The Council will continue to work in partnership with TfL in developing appropriate sustainable transport policies that will assist in improving Waltham Forest's bus and rail network.
2369	Mike Chrimes		With reference to buses no mention is made of two bus key routes, 97 which is the only route joining the north to the south of the borough and is heavily used, wand is notorious for its unreliability, and the 158 which is an important link from Chingford Mount. There is also an irregular service to Waltham Abbey along Sewardstone road, and I believe a dial-a-ride shoppers service along Wadham Way? The 275 also links Hale End to Walthamstow, and the 397 provides the only link to Whipps Cross. Night buses are omitted as well yet they provide routes home from any late night entertainment in the various centres.	The issues regarding transport are noted. The Council will continue to work in partnership with TfL in developing appropriate sustainable transport policies that will assist in improving Waltham Forest's bus and rail network.
2370	Mike Chrimes		No mention is made of the Hall Farm curve, intended to link users of the Chingford line to Stratford, which was a LBWF Labour manifesto commitment. This would make access to employment in Newham and Tower Hamlets easier by public transport	The issues regarding transport are noted. The Council will continue to work in partnership with TfL in developing appropriate sustainable transport policies that will assist in improving Waltham Forest's bus and rail network.
2371	Mike Chrimes		The opportunity sites, particularly at Chingford Mount seem to miss the more obvious development opportunities- why has the focus been on the Iceland site where the shops seem to be busy, rather than the opposite corner of New Road, currently vacant, the appalling fire damaged Poundland site-assumed to be subject to an insurance or criminal investigation, but it has an appalling effect on casual visitors, and the cleared retail/residential site on the corner of Templeton Avenue which has been empty for years.	This comment is noted. Presently there are no site allocations in the Local Plan. We will be consulting on a Site Allocations document alongside the Local Plan in 2020.

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ID	Full Name	Organisation	Comment	Council (Officers) Response
2372	Mike Chrimes		Although the report suggests a level of satisfaction with health services, there is widespread concern about access to and the state of Whipps Cross Hospital, and the state of care services.	This comment is noted with reference to the proposals for the redevelopment of Whipps Cross hospital.
2383	Mike Chrimes		The balance of retail, entertainment and commercial generally seems wrong. There appear to be too many poorly used retail units and office and worship space seems unattractive, while entertainment opportunities particularly for young people are low grade lacking. In the 'death of the high street' scenario planned flexibility seems desirable. Taking out retail seems an obvious route forward in Chingford Mount.	Chapter 11 of the Local Plan contains policies intended to promote a more flexible approach to High Street and retail policy. These comments are noted for discussion in that context.
2386	Mike Chrimes		The relative decline in the quality of the retail and entertainment offering at Chingford Mount is surely a reflection of the dramatic difference in income between that area and the rest of Chingford - a strong argument for offering education opportunities locally, and possibly small workshop units.	This comment is noted for further consideration.
2390	Mike Chrimes		At Chingford Mount perhaps more could be made of the ethic food and catering offering, but there seems to be a race to the bottom, lots of takeaway outlets and probably a heavy reliance of even some land standing restaurants on the takeaway trade. There is some evidence of new businesses struggling perhaps because they have not done their research. A Turkish restaurant was replaced by a curry restaurant which closed rapidly. The Mount/Obelisk pub has closed again; the last 'tenants' tried hard with community groups like line dancing, but the offering is cheap food competing with Weatherpersons and the green man and lots of other outlets, and some entertainment, which is well catered for at the Old Hall Tavern, Green Man and (Irish bar by Sainsburys), a better food offering, with decent wine an or craft beer might fare better, or more specialist music, or a bar aimed at much younger people. More work needs to done talking to businesses and finding out who	This comment is noted for further consideration noting the strategic policies for the area and the general thematic policies in the Local Plan.

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			they see as their customers, and possibly offering informed advice.	
2585	Mr Will Orlik		I can only relate to the South Chingford area really. The transport links are the worst in London. The journey to Stratford City from South Chingford take an hour by bus and not that much different by LUL/Overground. The 'Hall Farm Curve' should be reinstated. An opportunity missed at the time of the Olympics. The bus services (357, 97, W16, 158) are the worst in London in my opinion. There are already too many people and no decent transport links. Overpopulating won't improve the area.	The issues regarding frequency of buses and the need for better bus connections is noted. The Council will continue to work in partnership with TfL in developing appropriate sustainable transport policies that will assist in improving Waltham Forest's bus and rail network.
2760	Mrs Janet Charlesworth		SOUTH CHINGFORD I agree that significant regeneration of this area is badly needed for the local residents. If there were any opportunity for a rail stop here, that would massively improve its attractiveness and bring improved amenities and retail businesses in its wake.	This point is noted. However, the provision of such new rail infrastructure/investment to South Chingford would be difficult to secure at the present time as this would require significant capital expenditure.

Policy 20: Highams Park Strategic Location				
ID	Full Name	Organisation	Comment	Council (Officers) Response
462	Mr Michael Turpin		Overall I would say that I am commenting primarily on the area that I live in, eg Highams Park and that I agree almost 100% with the submission by the HPPG. I would add that the LBWF proposals fail to recognise that the ownership of a car is aspirational for very many people and essential for many, especially the older people who cannot cycle and find it painful and difficult to walk very far. The proposal for 450 new dwellings for the Highams Park area would totally change the	Comment noted and it will be taken into consideration.

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			character of the area for the worse and I am of the opinion that the infrastructure of the area could not cope with the extra population, by this I mean schools, transport and medical services. One area that could be redeveloped is the self-storage building in Larkshall Road, this only employs two people and brings no benefits to the area, only some extra traffic. The proposals also fail to address the 'regeneration' of the worst part of the area, the Aldrich Way Estate.	
498	Mr John Avis		My comments refer to Highams Park only: In order not to destroy the character of Highams Park there must be some rules: 1. The minimum growth target for Highams Park of 450 homes (approx) is way to high and it should be far less. 2. There must be a maximum number of storeys or a height limitation. A limit of about four storeys would fit in with the existing Victorian and Edwardian housing which makes up most of Highams Park. 3. The infrastructure (schools, doctors, power supply etc) must be available before or when the need arises and not after the need has arisen. 4. The Council must not give permission (or allow by its inactivity) the conversion of ground floor shops to residential accommodation. This affects the character of Highams Park and reduces the opportunity for local employment. 5. The Council must make parking a requirement of any development. To assume that people won't use cars is naive. Many people, myself included, are too old to ride a cycle or walk very far. Are the disabled and infirm to be confined to their homes? Without adequate parking provision that will be the result. The 15min shoppers free parking should be raised to 30min. 6. Affordable homes should be given to local people as a priority. 7. The Council should work with the Highams Park Planning Group to implement the neighbourhood plan which it has been developing and take into consideration this plan during the implementation of the LBWF Local Plan. 8. I support	The draft Local Plan acknowledges the distinctive nature of the different parts of the borough and sets out a spatial approach that takes account of the unique character of local areas and the diverse communities. Policies in the draft plan relate to borough-wide strategic matters. Neighbourhood plans seeking to apply locally specific policies must be conformity with the Local Plan. The Council is working with the Highams Park Planning Group to ensure that there is a good relationship between the Local Plan and the emerging Highams Park neighbourhood plan.

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			the reply, to the Local Plan, given to the Council on behalf of the Highams Park Planning Group by Gordon Turpin. After all, the Highams Park Planning Group was established to implement a neighbourhood plan on behalf of the residents of Highams Park.	
499	Mr John Avis		My comments refer to Highams Park only. In order not to destroy the character of Highams Park the minimum growth target for Highams Park of 450 homes (approx) is way too high and it should be far less. There must be a maximum number of storeys or a height limitation. A limit of about four storeys would fit in with the existing Victorian and Edwardian housing which makes up most of Highams Park.	The growth target included in the plan for local areas is based on evidence from the Growth Capacity Study (2019), which considers the capacity of identified sites in local areas to deliver the proposed targets. This is an indicative target. In considering development proposals, other factors including site specific conditions and the impact on local character also apply. The plan contains a range of policies to guide new development in local areas. All of these policies will be considered in decision making, ensuring that an appropriate balance is maintained between competing objectives - in this case delivering growth and ensuring that new development makes a positive contribution to the local environment.
592	Mrs Sheree Mear		The local community have done so much for Highams Park over the past ten years and the draft Local Plan as it stands would have a hugely negative impact and would clearly be a disaster for the area. Disappointingly it also appears there was no active engagement or consultation with the Highams Park Planning Group in the development of the Draft Plan, and the Highams Park Plan itself seems to have been disregarded completely. I am also forwarding the attached letter from the Highams Park Planning group that I understand has been sent in response to the plan. I share all the concerns raised on the letter and fully support all the comments raised on the letter in respect of the draft local plan.	The draft Local Plan has a borough-wide strategic focus to be supported by supplementary planning documents and master plans for identified local areas. The Council recognises the supporting role of neighbourhood plans such as that being prepared by the Highams Park Planning Group. However, in accordance with national planning policy, a neighbourhood plan must be in conformity with the Local Plan, delivering the strategic aspirations of the Local Plan set at higher level. The purpose of the draft plan consultation is to allow all groups, stakeholders and resident groups to comment on the plan at the same time so that competing interests and requirements could be considered and balanced before the plan is finalised.
612	Nicholas Larkin		We feel that a minimum of 450 additional homes will totally change the character of Highams Park. We are aware of the draft Local Plan which the objective is to retain local character.	The plan contains a range of policies to guide the redevelopment of local areas/sites and to ensure that new development is well integrated with local character. References

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Policy 20: Highams Park Strategic Location				
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			We feel that Highams Park railway station is an old and established focal point of the village. We strongly object to the appearance being altered. Also in recent years the station car park has been regularly used to host markets and local events that have been well attended and supported. As far as the development of the area we feel that your plans for the housing development will destroy and not enhance the character of the area which has been built over many years.	to sites do not earmark them specifically for development. The Council will be consulting on a Site Allocations document in 2020. The Council recognises that intensification could be associated with concerns about new developments being seen as inappropriate to their context and destroying much of what people see as valuable in their daily living environments. However, well-managed intensification could provide positive benefits to improve the quality of local environments.
618	Mr Gordon Turpin	Highams Park Planning Group	Character assessments needed in more areas than just the Highams Estate.	The draft Local Plan acknowledges the distinctive nature of the different parts of the borough and sets out a spatial approach that takes account of the unique character of local areas. The Council has undertaken a Characterisation and Intensification Study (2019), which considers how new development could be accommodated and sensitively managed.
619	Mr Gordon Turpin	Highams Park Planning Group	Disappointment at the lack of engagement with the HPPG in the formulation of headline Policies 17 & 20. Failure of the council to engage in any meaningful consultation as required by both the adopted and emerging London Plan. Parameters expressed in the draft Highams Park Plan have been disregarded.	The draft Local Plan has a borough-wide strategic focus to be supported by supplementary planning documents, master plans for identified local areas. The Council recognises the supporting role of neighbourhood plans such as that being prepared by the Highams Park Planning Group. However, in accordance with national planning policy, a neighbourhood plan must be in conformity with the Local Plan, delivering the strategic aspirations of the Local Plan set at higher level. The Council has declared its commitment to work with the Highams Park Planning Group to ensure a good relationship between both plans.
620	Mr Gordon Turpin	Highams Park Planning Group	Disappointment at the lack of engagement with the HPPG in the formulation of headline Policies 17 & 20. Failure of the council to engage in any meaningful consultation as required by both the adopted and emerging London Plan. Parameters expressed in the draft Highams Park Plan have been disregarded.	The draft Local Plan has a borough-wide strategic focus to be supported by supplementary planning documents, master plans for identified local areas. The Council recognises the supporting role of neighbourhood plans such as that being prepared by the Highams Park Planning Group. However, in accordance with national planning policy, a neighbourhood plan must be in conformity with the Local Plan, delivering the strategic

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				aspirations of the Local Plan set at higher level. The Council has declared its commitment to work with the Highams Park Planning Group to ensure a good relationship between both plans.
621	Mr Gordon Turpin	Highams Park Planning Group	Clarity is needed on 'taking advantage of special areas of character'.	This point is noted. It is proposed to review/amend this statement for better clarity and interpretation.
623	Mr Gordon Turpin	Highams Park Planning Group	The minimum 450 additional homes is too high.	The growth targets included in the plan is based on evidence from the Growth Capacity Study 2019. The concern raised about the impact of growth on local character is recognised. The draft Local Plan contains a range of policies to guide growth and change and to ensure that new development is carried out in harmony with its setting and makes a positive contribution to the local environment. See Policy 5 (Approach to Intensification) and Policy 62 (High Quality Design) and Policy 63 (Tall Buildings). Other policies also consider amenity and other issues relating to local character. All of these policies are considered in decision making, ensuring that an appropriate balance is maintained between competing objectives and that new development is sensitively designed.
624	Mr Gordon Turpin	Highams Park Planning Group	Agree with the existing designated centre of the boundary.	This is noted.
625	Mr Gordon Turpin	Highams Park Planning Group	We do not support the redevelopment of the station building or building on the car/park/access road to the station adjacent to The Avenue.	The sites mentioned in the document have been identified as examples of under-used sites with potential for redevelopment. The Council is preparing an additional Local Plan document on site-specific allocations. This will identify the full list of sites being considered. This new document will provide opportunity to apply the policies of the plan on specific sites, providing more details on how new developments could be integrated within existing local areas. Separate consultation on the

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Policy 20: Highams Park Strategic Location				
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				preparation of the site allocations document will be undertaken.
626	Mr Gordon Turpin	Highams Park Planning Group	Development of James Yard should be conditional on the delivery of single level access from the station to Larkshall Road Adjacent to the Level Crossing.	This point is noted. The Council is preparing an additional Local Plan document on site specific allocations. This will provide opportunity to apply the policies of the plan on specific sites, providing more details on how new developments could be integrated within existing local areas.
627	Mr Gordon Turpin	Highams Park Planning Group	Ensure that the redevelopment of the listed Regal building as a Cinema is the principle driver of this objective.	This point is noted.
628	Mr Gordon Turpin	Highams Park Planning Group	Clarity in the plan that Hale End Library should be retained as it is the only public amenity in the Highams Park Areas.	Policy 56 of the draft plan seeks to resist the loss of social infrastructure including libraries.
631	Mr Gordon Turpin	Highams Park Planning Group	Meeting on the 5 April 2019 LBWF suggested delaying the examination of the HP Plan until after the then pending consultation on the Draft Local Plan due to sites identified by the Plan could conflict with those in the HP Plan. Scant details on sites being put forward for development. Why are brownfield sites in Highams Park identified by LBWF as sites for development not included in the updated Brownfield Register?	The Council is preparing an additional Local Plan document on site-specific allocations. This will provide opportunity to apply the policies of the plan on specific sites, providing more details on how new developments could be integrated within existing local areas. The Brownfield Land Register will be reviewed annually.
733	Mr Gordon Turpin		Character assessments needed in more areas than just the Highams Estate.	The Council has undertaken a Characterisation and Intensification Study that has considered how new development could be accommodated at the locations where opportunities exist.
734	Mr Gordon Turpin		References to housing targets are potentially misleading for many consultees who will most likely focus on their own specific areas when reviewing the documents. The monitoring target is set at 4,000 dwellings, which is 74% higher than the 2,300 homes identified for the North Waltham Forest Strategic Area.	The Council notes the error in the growth figures stated. This will be corrected.

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Policy 20: Highams Park Strategic Location				
ID	Full Name	Organisation	Comment	Council (Officers) Response
737	Mr Gordon Turpin		Clarity needed on 'taking advantage of special areas of character'.	This point is noted for consideration. For better clarity and interpretation, it is proposed to re-word all statements made in the plan with this reference - 'taking advantage of'.
741	Mr Gordon Turpin		Disappointment at the lack of engagement with the HPPG in the formulation of headline Policies 17 & 20. Failure of the council to engage in any meaningful consultation as required by both the adopted and emerging London Plan. Parameters expressed in the draft Highams Park Plan have been disregarded.	This current round of consultation seeks to provide the opportunity for all stakeholders, residents, community groups and indeed everyone with an interest in Waltham Forest to comment on the draft plan at the same time before the plan is finalised. This is to allow all competing and conflicting interests to be resolved at a single stage, rather than a series of consultation meetings with different groups and stakeholders, which clearly would have significant resource implications and could have had the effect of favouring some selected groups.
747	Mr Gordon Turpin		We do not support the redevelopment of the station building or building on the car/park/access road to the station adjacent to The Avenue.	The plan contains a range of policies to guide the redevelopment of local areas/sites and to ensure that new development is well integrated with local character. References to sites do not earmark them specifically for development. The Council will be consulting on a Site Allocations document in 2020.
749	Mr Gordon Turpin		Development of James Yard should be conditional on the delivery of single level access from the station to Larkshall Road Adjacent to the Level Crossing.	This point is noted.
752	Mr Gordon Turpin		Ensure that the redevelopment of the listed Regal building as a Cinema is the principle driver of this objective.	This is noted.
753	Mr Gordon Turpin		Clarity in the plan that Hale End Library should be retained as it is the only public amenity in the Highams Park Areas.	This point is noted. The Plan seeks to protect social infrastructure uses including meeting halls, libraries, etc. ((See Policy 55).
754	Mr Gordon Turpin		Agree with the existing designated centre of the boundary.	This is noted.

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756	Mr Gordon Turpin		The minimum 450 additional homes is too high.	The growth target included in the plan for local areas is based on evidence from the Growth Capacity Study (2019), which considers the capacity of identified sites in local areas to deliver the proposed targets. This is an indicative target. In considering development proposals, other factors including site specific conditions and the impact on local character also apply. The plan contains a range of policies to guide new development in local areas. All of these policies will be considered in decision making, ensuring that an appropriate balance is maintained between competing objectives - in this case delivering growth and ensuring that new development makes a positive contribution to the local environment.
758	Mr Gordon Turpin		Disappointment at the lack of engagement with the HPPG in the formulation of headline Policies 17 & 20. Failure of the council to engage in any meaningful consultation as required by both the adopted and emerging London Plan. Parameters expressed in the draft Highams Park Plan have been disregarded.	This current round of consultation seeks to provide the opportunity for all stakeholders, residents, community groups and indeed everyone with an interest in Waltham Forest to comment on the draft plan at the same time before the plan is finalised. This is to allow all competing and conflicting interests to be resolved at a single stage, rather than a series of consultation meetings with different groups and stakeholders, which clearly would have significant resource implications and could have had the effect of favouring some selected groups. A neighbourhood plan must be in conformity with the Local Plan, delivering the strategic aspirations of local areas set at the higher level of the borough wide Local Plan. A neighbourhood plan cannot determine the strategic direction of the Local Plan.
925	Mr Mathew Frith		Part 8: We support this.	Support is welcomed and this comment is noted for further discussion.
1045	Mr Tim Brennan	Historic England	We consider the Ropers Field conservation area should be explicitly referenced in the criteria for future development.	This comment is noted for further discussion.

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1173	Mrs Jean Turpin		<p>***IN AGREEMENT WITH HPPG LETTER*** I have serious concerns regarding over-densification of development in the Highams Park area. Whilst I appreciate the need to provide homes for the growing population, house building should be appropriate and not change the light suburban feel of Highams Park. The allowable density of development outside of the district centre is much too high and will lead to substantial changes in the character of the area, which is contrary to the stated vision of the draft Local Plan Development outside of the District Centre should restrict density of development to a maximum of 50% of what is currently proposed so as to provide lower density houses (not flats) suitable for families. Housing in the District Centre should be restricted to a maximum of five storeys. Outside of the District Centre there should be a height limit of four storeys.</p>	This is noted. See response to HPPG (Gordon Turpin)
1180	Mrs Jean Turpin		<p>I have serious concerns regarding over-densification of development in the Highams Park area. Whilst I appreciate the need to provide homes for the growing population, house building should be appropriate and not change the light suburban feel of Highams Park. The allowable density of development outside of the district centre is much too high and will lead to substantial changes in the character of the area, which is contrary to the stated vision of the draft Local Plan Development outside of the District Centre should restrict density of development to a maximum of 50% of what is currently proposed so as to provide lower density houses (not flats) suitable for families. Housing in the District Centre should be restricted to a maximum of five storeys. Outside of the District Centre there should be a height limit of four storeys.</p>	Noted for consideration.
1181	Mrs Jean Turpin		<p>I have serious concerns regarding over-densification of development in the Highams Park area. Whilst I appreciate the need to provide homes for the growing population, house</p>	It is recognised that intensification could be associated with concerns about new development becoming inappropriate to their context and destroying much of what people see as

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			building should be appropriate and not change the light suburban feel of Highams Park. The allowable density of development outside of the district centre is much too high and will lead to substantial changes in the character of the area, which is contrary to the stated vision of the draft Local Plan Development outside of the District Centre should restrict density of development to a maximum of 50% of what is currently proposed so as to provide lower density houses (not flats) suitable for families. Housing in the District Centre should be restricted to a maximum of five storeys. Outside of the District Centre there should be a height limit of four storeys.	valuable in their daily living environments. However, if well managed, intensification could provide positive benefits to improve the quality of local environments. The plan contains a range of policies to guide the redevelopment of sites/areas whilst prioritising the protection of local character.
1183	Mrs Jean Turpin		There may be scope for some redevelopment in the District Centre where some of the parades on Winchester Road are now looking a bit tired, but the overall size of the centre should not be reduced and housing should not be allowed at ground floor level. The existing station building is key to the character and feel of Highams Park and should be retained and not redeveloped; it should be listed.	These comments are noted. There are no site allocations in the Local plan as these will be consulted at a later stage and there are therefore no plans that would affect the station.
1187	Mrs Jean Turpin		There is also scope for a mix of housing and business use in the business zone off Larkshall Road behind Tesco - development here would not substantially change the character of the area. The space currently occupied by Julies Car Wash and the Chevrolet Centre adjacent to St Anne's Church , E4 6NP.	The Council is preparing an additional Local Plan document on site specific allocations. This will provide opportunity to apply the policies of the plan on specific sites, providing more details on how new developments could be integrated within existing local areas.
1191	Rachel Kercani		***IN AGREEMENT WITH HPPG LETTER*** I understand that we need more housing, especially affordable housing but to build at least 450 more homes in the small space that is Highams Park is just not workable. Not only would it ruin the character of Highams Park but I feel the logistics of increasing the local population have not been considered.	The growth target included in the plan for local areas is based on evidence from the Growth Capacity Study 2019, which considers the capacity of identified sites in local areas to deliver the proposed targets. This is an indicative target. In considering development proposals, other factors including site specific conditions and the impact on local character also apply. The plan contains a range of policies to guide new development in local areas. All of these policies will be considered in decision making, ensuring that an appropriate balance is maintained

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				between competing objectives - in this case delivering growth and ensuring that new development makes a positive contribution to the local environment.
1198	Rachel Kercani		One of the beauties of Highams Park is that it is very green with its patches of woodland and playing fields - I hope that these will be maintained and not built on as these are all well used and loved.	The Local Plan seeks to maintain and where possible extend the green areas of the borough. In addition, it should be noted that the area of the Highams Park Neighbourhood Plan affords Local Green Space designation to much of the open areas in the event that it passes referendum.
1199	Rachel Griffin		***IN AGREEMENT WITH HPPG LETTER***	See response to HPPG (Gordon Turpin)
1200	Mr Peter McPartland OBE		***IN AGREEMENT WITH HPPG LETTER***	See response to HPPG (Gordon Turpin)
1201	Kerry Morrow		***IN AGREEMENT WITH HPPG LETTER***	See response to HPPG (Gordon Turpin)
1234	Andy Newcombe		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See response to HPPG (Gordon Turpin)
1239	Stephen Cusworth		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See response to HPPG (Gordon Turpin)
1253	Russell Wellard		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See response to HPPG (Gordon Turpin).
1263	Unnamed c/o Turley Associates	Turley Associates unnamed c/o	Due to commercial restrictions at the point of this submission these written representations have been submitted on a private and confidential basis. However, it is confirmed that the focus of these representations and linked interest relates to part of the Highams Park Industrial Estate which is referenced as	Support for the policy is noted.

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			Borough Employment Area (BEA)13 within the current adopted Local Plan and a revised BEA2 reference within the current consultation draft. Draft Policy 20 (Highams Park Strategic Location) Our client is in principle supportive of the draft wording relating to the Highams Park Strategic Location. Providing a minimum growth target of 450 new homes is considered to be realistic, however, we would request that the policy should be worded flexibly enough to allow the detailed design of available and deliverable sites to determine the optimum number of new homes to be delivered which may, taking wider sites within the sub-area into consideration, comfortably exceed this minimum target.	
1264	Joanne Ganly		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted, and our response will form part of our comments on the HPPG Letter.
1268	Joanne Taylor		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted, and our response will form part of our comments on the HPPG Letter.
1272	Neil Parry		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See response to HPPG (Gordon Turpin)
1284	Joanna Dare		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See response to HPPG (Gordon Turpin)
1295	Mrs Joanne Wakefield		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See response to HPPG (Gordon Turpin)
1305	Pamela May		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See response to HPPG (Gordon Turpin)

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1306	David and Patricia Ovenden		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See response to HPPG (Gordon Turpin)
1307	Vanessa Carregal-Brammer		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See response to HPPG (Gordon Turpin)
1310	Mr Luke Tatam		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See response to HPPG (Gordon Turpin)
1311	Kathleen Evans		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See response to HPPG (Gordon Turpin)
1312	Mrs Beryl Lough		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See response to HPPG (Gordon Turpin)
1313	Mrs Judy & Mr David Smith		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See response to HPPG (Gordon Turpin)
1315	Mrs Fiona Merrick		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See response to HPPG (Gordon Turpin)
1316	Steff De Simone		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See response to HPPG (Gordon Turpin)
1317	Ruth Lovell		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See response to HPPG (Gordon Turpin)
1318	Martin & Lesley Pollington		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See response to HPPG (Gordon Turpin)

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1319	Sarita & Niall Taylor		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See response to HPPG (Gordon Turpin)
1320	Louisa Newton		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See response to HPPG (Gordon Turpin)
1321	Peter Resteghini		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See response to HPPG (Gordon Turpin)
1322	Grace Brown		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See response to HPPG (Gordon Turpin)
1323	Helen Middup		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See response to HPPG (Gordon Turpin)
1324	James Quinn		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See response to HPPG (Gordon Turpin)
1325	Melissa Appel		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See response to HPPG (Gordon Turpin)
1327	Hannah Hyde		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See response to HPPG (Gordon Turpin)
1330	Michael Brammer		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See Waltham Forest Council's response to the HPPG letter (Gordon Turpin).
1331	Beatriz Maldonado Carreno		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See response to HPPG (Gordon Turpin)

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1353	Gordon Turpin	Highams Park Planning Group	***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See response to HPPG (Gordon Turpin)
1355	Mr. Gordon Turpin		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See response to HPPG (Gordon Turpin)
1368	Emily Wheeler		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See response to HPPG (Gordon Turpin)
1369	Emily Wheeler		I understand the need for more housing and there are opportunities outlined in this letter from the HPPG to build more housing without losing the distinct assets, feel and character of the area. We also do not want to lose the only civic space we have in Highams Park - our wonderful library. Highams Park has a very special village feel to it that the council could really build on socially and economically if it is preserved sensitively, but these plans will destroy that opportunity.	It is recognised that intensification could be associated with concerns about new development becoming inappropriate to their context. The plan contains a range of policies to guide the redevelopment of sites/areas whilst prioritising the protection of local character and preserving valuable social infrastructure such as libraries.
1416	Rabina Saboowala		***IN AGREEMENT WITH HPPG LETTER*** I do not support this amount of development for Highams Park as it significantly changes the character of Highams Park. I understand HPPG's Committee have reviewed the proposals in the draft Local Plan and have sent the attached letter to the Council with their comments. I am forwarding HPPG's attached letter to state that I support their comments on the draft Local Plan and do not support the plan for Highams Park.	Please see Waltham Forest Council's response to the HPPG letter as recorded under the HPPG (Gordon Turpin).
1417	Mr Colin Jenkins		I have looked at your proposals for the local plan and am supportive of much of the content. However, I would like to object to the intensification of residential building in Highams Park, which I believe will have a detrimental effect on the character of the area and place great strain on what are already over-stretched infrastructure, such as roads and parking facilities. While I appreciate that demographic growth	These comments are noted. It is recognised that intensification could be associated with concerns about new development becoming inappropriate to their context and destroying much of what people see as valuable in their daily living environments. However, if well managed intensification could provide positive benefits to improve the quality of local environments. The plan contains a range of policies to guide the

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			necessitates the building of some additional accommodation, this should be sensitive to the needs and existing nature of the local area and not risk having a detrimental impact on the local environment.	redevelopment of sites/areas whilst prioritising the protection of local character.
1419	Carey Benn		***IN AGREEMENT WITH HPPG LETTER***	Please see Waltham Forest Council's response to the HPPG letter as recorded and referenced under consultee name - HPPG (Gordon Turpin).
1420	Carey Benn		Adding five-storey housing around the station, will irreparably change HP. We should encourage development and brown field sites - but it must be empathetic to the area and balance residential with commercial and retail.	The concern raised about the impact of growth on local character is recognised - in particular that new development could become inappropriate to the existing local context. The plan contains policies to ensure redevelopment is well managed. It contains a range of policies to guide growth and transformation of local areas to ensure that new development is carried out in harmony with its setting and makes a positive contribution to the local environment.
1462	Ms Hanna Chalmers		***IN AGREEMENT WITH HPPG LETTER*** Most Londoners and people living in Highams Park understand the need for more housing - there are opportunities as outlined in this letter from the HPPG to build more housing without losing the distinct assets and local character of the area that we have here and the one civic space we have in Highams Park - the purpose built, recently refurbished and incredibly well utilised library.	The Council's response to the HPPG letter is recorded and referenced under HPPG (Gordon Turpin).
1470	Sara Doyle		It's very disappointing that the council appear to have disregarded the previous findings of the HPPG, given they work so hard to promote the views of our local community. As per the contents of the attached, I'd particularly like to add my own objections to any redevelopment of important community sites such as the library and the station. I appreciate new homes must be built, but the number suggested by the council in this area is too high and would be to the detriment of the local community.	The draft Local Plan has a borough-wide strategic focus to be supported by supplementary planning documents and masterplans for identified local areas. The Council recognises the supporting role of neighbourhood plans such as that being prepared by the Highams Park Planning Group. However, in accordance with national planning policy, a neighbourhood plan must be in conformity with the Local Plan, delivering the strategic aspirations of the Local Plan set at higher level. The policies of the plan seek to protect existing social and community infrastructure. The housing target is supported by

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				evidence - the Growth Capacity Study (2019) and the Characterisation and Intensification Study (2019).
1473	Tim Green		***IN AGREEMENT WITH HPPG LETTER*** I fully support the attached comments and as a resident think the additional homes proposed is far too many. The strain on the local services and the strong community we have would be too great. It would be irreversibly damaging to the area.	These comments are noted, and our response will follow on the HPPG Letter.
1478	Sara McDonnell Shacklock		Agree that redeveloping the station building would ruin the character of the area's centre, which I know from friends in the area is much appreciated.	The plan contains a range of policies to guide the redevelopment of local areas/sites and to ensure that new development is well integrated with local character. References to sites do not earmark them specifically for development. The Council will be consulting on a Site Allocations document later in 2020.
1481	Sharlene Sarolli		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See response to HPPG (Gordon Turpin)
1482	John De'Ath		I object to the planned development of Highams Park. It will destroy the village centre. It didn't happen to Walthamstow village. The businesses will move away never to return. Increases in the fundamental infrastructure of doctors, schools, parking, transport - both bus and train, power, gas and water are not included. The proposal will destroy the community.	This comment is noted. The next iteration of the Local plan to be consulted in the summer of 2020 will be accompanied by an infrastructure Delivery Plan and a Site Allocations document that will provide further detail and clarification.
1483	Sharlene Sarolli		In particular, I am most concerned about the local schools, GPS and parking. These are already under pressure and this plan will add to the already strained recourses.	This comment is noted. The next iteration of the Local Plan to be consulted in 2020 will be accompanied by an infrastructure Delivery Plan and a Site Allocations document that will provide further detail and clarification.
1491	Sharlene Sarolli		Most Londoners and people living in Highams Park understand the need for more housing - there are opportunities as outlined in this letter from the HPPG to build more housing without losing the distinct assets and local character of the area that we have here and the one civic space we have in Highams Park -	The plan contains a range of policies to guide the redevelopment of local areas/sites and to ensure that new development is well integrated with local character. References to sites do not earmark them specifically for development. The

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			the purpose built, recently refurbished and incredibly well utilised library.	Council will be consulting on a Site Allocations document in 2020.
1503	Helen Monger	London Parks and Gardens Trust	LPGT welcomes the term "heritage, cultural and green assets" eg in Policies 6, 18, 19, 20, 21 and feel that this captures the spirit of good design. This term should be applied elsewhere in the plan to ensure all development meets this criteria.	Support noted.
1640	Mr Phil McMenemy		***IN AGREEMENT WITH HPPG LETTER*** Can I just add that I find it disappointing that the effort that the local community put into the local plan appears to have been largely ignored in this process.	The Council's response to the HPPG letter is recorded and referenced under HPPG (Gordon Turpin). The Council has worked with the HPPG on the Highams Park Neighbourhood Plan. When adopted, the Highams Park Neighbourhood Plan will be part of Waltham Forest Council's development plan.
1648	Emily Grant		***IN AGREEMENT WITH HPPG LETTER*** What I and many others do not understand is how yourself and members of the council can file to create several thousands of homes in Waltham Forest, when there's little space and too much demand here already. There's little green space, parking, few hospitals, GPs, dentists, and schools. All of these are so strained with cuts and high numbers of people! I have family who work in a local school (and close family friends), and I see the stress is affecting their mental health which leads to general health, which affects my mental health more as I do not like to see them stressed, upset and ill.	The Council's response to the HPPG letter is recorded and referenced under HPPG (Gordon Turpin). The concern raised about the impact of growth on local character is recognised - in particular that new development could become inappropriate to the existing local context. The draft Local Plan contains a range of policies to guide growth and change and to ensure that new development is carried out in harmony with its setting and makes a positive contribution to the local environment. See Policy 5 (Approach to Intensification) and Policy 62 (High Quality Design) and Policy 63 (Tall Buildings). Other policies also consider amenity and other issues relating to local character. All of these policies are considered in decision making, ensuring that an appropriate balance is maintained between competing objectives and that new development is sensitively designed. The Local Plan will be supported by an Infrastructure Delivery Plan, which will set out details of the borough's infrastructure requirements. This document will set out what is needed, where it is needed and when it is needed. It will also set out the delivery mechanism to ensure the timely delivery of infrastructure.

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1650	Emily Grant		Housing in Waltham Forest isn't affordable. Yes, the UK needs housing, just like all countries. But things such as schools, GPs and hospitals need to be PRIORITISED alongside. Creating more homes means more vehicles. There's so many problems with Mini Holland (Walthamstow). Many people struggle enough as it is to park around the borough. Also, more cars has it problems on an environmental side. People are wanting to transition to hybrid and electric cars. Will charging stations be created with the planned housing?	Noted for consideration. The Infrastructure Delivery Plan is being prepared alongside the Local Plan and will set out the infrastructure requirements needed to support growth. In addition, the Local Plan has a policy which sets out support for electric car charging points.
1651	Emily Grant		What NEEDS to be done is to look at all vacant properties whether they are homes or businesses, and put them to use! People in overcrowded accommodation to be placed in the correct accommodation. For properties that are in bad shape (mould, flooding, burnt down), to be sorted and put back to use. Highams Park and Chingford are overcrowded with coffee shops and vacant shops, and vacant homes.	The plan includes policies to encourage the redevelopment of vacant/underused land and properties.
1661	Mrs Gillian Poulter		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See response to HPPG (Gordon Turpin)
1662	Mrs Gillian Poulter		I have many concerns regarding the scale, and insinuated redevelopment proposals. There seems an emphasis on keeping the character of each of the areas, and yet the possible outcome of your document, particularly in the Highams Park are of the Northern Plan would completely change the community that currently flourishes there and the overall character of what is a unique town centre.	The plan contains a range of policies to guide new development in local areas. All of these policies are considered in decision making, ensuring that an appropriate balance is maintained between competing objectives - in this case delivering growth and ensuring that new development makes a positive contribution to the local environment.
1670	Kristy Sheed		***IN AGREEMENT WITH HPPG LETTER*** I am unhappy with the current plan as it stands and agree wholeheartedly with the HPPG's response to you as per the attached PDF letter.	The Council's response to the HPPG letter is recorded and referenced under HPPG (Gordon Turpin).
1672	Kevin King		***IN AGREEMENT WITH HPPG LETTER*** I am concerned about the lack of engagement with the Highams Park Planning Group in advance of the plans being developed - this seems to	The Council's response to the HPPG letter is recorded and referenced under HPPG (Gordon Turpin). The earlier round of consultation at the Direction of Travel (Issues and Options)

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			be completely at odds with the idea of community engagement and is concerning. I would also like to see explicit reference made to the redevelopment of the cinema at the Regal - an odd omission given various statements of support from the council. Highams Park residents often feel plans affecting the area are made without the involvement or engagement of the people that live there. This needs to happen in a more effective and meaningful way.	stage, offered the first opportunity for engagement on the contents of the plan. The Council consulted the HPPG at this stage and received a response. Following this, the purpose of the draft Plan consultation is to allow all stakeholders, residents, community groups and indeed everyone with an interest in Waltham Forest to comment on the draft plan at the same time before the document is finalised. This is to allow opportunity for all competing and conflicting interests to be resolved at a single stage. The Plan supports the provision of community and recreational facilities throughout the borough.
1689	Olivia Rumah		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See response to HPPG (Gordon Turpin)
1690	Tim Sheed		***IN AGREEMENT WITH HPPG LETTER*** I am unhappy with the current plan as it stands and agree wholeheartedly with the HPPG's response to you as per the attached PDF letter.	The Council's response to the HPPG letter is recorded and referenced under HPPG (Gordon Turpin).
1692	Nigel Reynolds		***IN AGREEMENT WITH HPPG LETTER*** In summary I will say Highams Park has a recognised character and has an active and vibrant community. I feel the local plan should enhance these factors. The proposed plans will substantially change the character Highams Park and reduce its vibrancy.	The Council's response to the HPPG letter is recorded and referenced under HPPG (Gordon Turpin). The concern raised about the impact of growth on local character is recognised - in particular that new development could become inappropriate to the existing local context. The Plan contains policies to ensure redevelopment is well managed. It contains a range of policies to guide growth and transformation of local areas to ensure that new development is carried out in harmony with its setting and makes a positive contribution to the local environment.
1693	Jennifer Herring		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See response to HPPG (Gordon Turpin)

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1697	Joel Gethin Lewis		***IN AGREEMENT WITH HPPG LETTER*** Most Londoners and people living in Highams Park understand the need for more housing - there are opportunities as outlined in this letter from the HPPG to build more housing without losing the distinct assets and local character of the area that we have here and the one civic space we have in Highams Park - the purpose built, recently refurbished and incredibly well utilised library.	The Council's response to the HPPG letter is recorded and referenced under HPPG (Gordon Turpin). The concern raised about the impact of growth on local character is recognised - in particular that new development could become inappropriate to the existing local context. The Plan contains policies to ensure redevelopment is well managed. It contains a range of policies to guide growth and transformation of local areas to ensure that new development is carried out in harmony with its setting and makes a positive contribution to the local environment. Policy 55 of the draft plan seeks to protect social infrastructure uses such as libraries.
1701	Andrea Williams (nee Kingsley)		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See response to HPPG (Gordon Turpin)
1703	Maria Killick		***IN AGREEMENT WITH HPPG LETTER*** I would like to state that I support the comments on the draft Local Plan, sent to you by the Highams Park Planning Group. I do not agree with more houses within the Highams Park area.	The Council's response to the HPPG letter is recorded and referenced under HPPG (Gordon Turpin). The concern raised about the impact of growth on local character is recognised - in particular that new development could become inappropriate to the existing local context. The Plan contains policies to ensure redevelopment is well managed. It contains a range of policies to guide growth and transformation of local areas to ensure that new development is carried out in harmony with its setting and makes a positive contribution to the local environment.
1704	Maria Killick		I would like to state that I support the comments on the draft local plan, sent to you by the Highams Park Planning Group. I do not agree with more house within the Highams Park area.	The Local Plan must be in general conformity with the London Plan. The London Plan sets a housing target for the whole borough and requires Waltham Forest Council to deliver housing in accessible locations near public transport, which includes areas such as Highams Park.

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1706	Roy Killick		***IN AGREEMENT WITH HPPG LETTER*** I would like to state that I support the comments on the draft Local Plan, sent to you by the Highams Park Planning Group. I do not agree with more housing in the small Highams Park Area.	The Council's response to the HPPG letter is recorded and referenced under HPPG (Gordon Turpin). The concern raised about the impact of growth on local character is recognised - in particular that new development could become inappropriate to the existing local context. The plan contains policies to ensure redevelopment is well managed. It contains a range of policies to guide growth and transformation of local areas to ensure that new development is carried out in harmony with its setting and makes a positive contribution to the local environment.
1707	Roy Killick		I would like to state that I support the comments on the draft local plan, sent to you by the Highams Park Planning group. I do not agree with more housing in the small Highams Park Area.	The Local Plan must be in general conformity with the London Plan. The London Plan sets a housing target for the whole borough and requires Waltham Forest Council to deliver housing in accessible locations near public transport, which includes areas such as Highams Park.
1710	Carol Resteghini		***IN AGREEMENT WITH HPPG LETTER*** I believe specific consideration should be made of the environmental and situational significance of The Highams Park.	The Council's response to the HPPG letter is recorded and referenced under HPPG (Gordon Turpin). The concern raised about the impact of growth on local character is recognised - in particular that new development could become inappropriate to the existing local context. The plan contains policies to ensure redevelopment is well managed. It contains a range of policies to guide growth and transformation of local areas to ensure that new development is carried out in harmony with its setting and makes a positive contribution to the local environment.
1713	Roger Torode	Highams Park Forum	***IN AGREEMENT WITH HPPG LETTER*** I wish to support the comments made by the Highams Park Planning Group. This is an area full of character with an active and vibrant community. The Local Plan should aim to enhance and support this but the proposals in your plan are liking to substantially change the character of the area and reduce its vibrancy. There needs to be ongoing, detailed, engagement by Council Officers	The Council's response to the HPPG letter is recorded and referenced under HPPG (Gordon Turpin). The concern raised about the impact of growth on local character is recognised - in particular that new development could become inappropriate to the existing local context. The plan contains policies to ensure redevelopment is well managed. It contains a range of policies to guide growth and transformation of local areas to

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			with the Highams Park Planning Group, as the neighbourhood development forum for this area, to develop a regeneration strategy for the Highams Park Area. This should take pace before publication and consultation on the next draft of the Local Plan.	ensure that new development is carried out in harmony with its setting and makes a positive contribution to the local environment.
1748	Roger Torode		I wish to support the comments made by the Highams Park Planning Group. This is an area full of character with an active and vibrant community. The Local Plan should aim to enhance and support this but the proposals in your plan are liking to substantially change the character of the area and reduce its vibrancy.	The Strategic Location Policy for Highams Park aims to build on the character of the area and aims to enhance and support it. The design and heritage policies in the Local Plan also have a strong focus on enhancing and retaining character.
1751	Mark Wiltshire		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See response to HPPG (Gordon Turpin)
1759	Mark Wiltshire		Target of 450 new homes is too high, it will destroy the character of the area.	This comment is noted. The Council will be consulting on a Site Allocations document and a revision of the draft Local Plan in 2020. Policies in the Local Plan are prepared as much as possible to preserve and enhance area character and these will be carried forward into the next stage of the Plan.
1760	Mark Wiltshire		A total redeveloping of the station will also, I feel, destroy the area, and a key focal part of the village. Particularly used for community events.	The Plan contains a range of policies to guide the redevelopment of local areas/sites and to ensure that new development is well integrated with local character. References to sites do not earmark them specifically for development. The Council will be consulting on a Site Allocations document in 2020.
1765	Wendy Mathers-Ford		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See Waltham Forest Council's response to the HPPG letter (Gordon Turpin)
1792	Mr Thomas L'Estrange		***IN AGREEMENT WITH HPPG LETTER*** I am particularly concerned about the level of additional housing proposed. The addition of an extra 450 homes/housing units close to the centre will drastically alter the 'feel' of Higham Park. Whilst I	The Council's response to the HPPG letter is recorded and referenced under HPPG (Gordon Turpin). The concern raised about the impact of growth on local character is recognised - in particular that new development could become inappropriate

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			<p>appreciate the need for housing, I do not see that this should be provided in areas where the local schools are already full with no room for further expansion, where parking is already a major problem and doctors' surgeries are already oversubscribed. What also saddens me is that I feel far from certain that the Council will take in to account the views of the Highams Park residents. As a prime example, the local opposition to the Tesco development was ignored when the size of the Section 106 money was realised. I am not aware that any of it was spent in Highams Park.</p>	<p>to the existing local context. The Plan contains policies to ensure redevelopment is well managed. It contains a range of policies to guide growth and transformation of local areas to ensure that new development is carried out in harmony with its setting and makes a positive contribution to the local environment.</p>
1796	Deborah Taylor		<p>***IN AGREEMENT WITH HPPG LETTER*** As a local resident of nearly 30 years, I share many of the concerns expressed in the letter. It is impossible to escape the feeling that the council is intending to shoehorn a huge number of dwellings into Highams Park without due regard to local sentiment and with as little public consultation as possible. An additional 450 homes within half a mile of Highams Park station is far too many. Development on this scale would irreparably damage the character of the area, to a say nothing of the pressure on local schools, GP surgeries and the roads which are already heavily congested at peak times.</p>	<p>The Council's response to the HPPG letter is recorded and referenced under HPPG (Gordon Turpin). The concern raised about the impact of growth on local character is recognised - in particular that new development could become inappropriate to the existing local context. The Plan contains policies to ensure redevelopment is well managed. It contains a range of policies to guide growth and transformation of local areas to ensure that new development is carried out in harmony with its setting and makes a positive contribution to the local environment. The earlier round of consultation at the Direction of Travel (Issues and Options) stage, offered the first opportunity for engagement on the contents of the Plan. Following this, the purpose of the draft Plan consultation is to allow all stakeholders, residents, community groups and indeed everyone with an interest in Waltham Forest to comment on the draft Plan at the same time before the document is finalised. This is to allow opportunity for all competing and conflicting interests to be resolved at a single stage.</p>
1801	Gina Mathews-Mesel		<p>***IN AGREEMENT WITH HPPG LETTER*** I have been a resident of Highams Park for the last eight years, I was taken aback when I read the council's plans for the area in the borough plan.</p>	<p>The Council's response to the HPPG letter is recorded and referenced under HPPG (Gordon Turpin). The concern raised about the impact of growth on local character is recognised - in particular that new development could become inappropriate</p>

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				to the existing local context. The Plan contains policies to ensure redevelopment is well managed. It contains a range of policies to guide growth and transformation of local areas to ensure that new development is carried out in harmony with its setting and makes a positive contribution to the local environment.
1802	Erik Mesel	John Lyons Charity	***IN AGREEMENT WITH HPPG LETTER*** Highams Park area does not have the local infrastructure for this increase in population.	The Council's response to the HPPG letter is recorded and referenced under HPPG (Gordon Turpin). The Local Plan will be supported by an Infrastructure Delivery Plan, which will set out details of the borough's infrastructure requirements. This document will set out what is needed, where it is needed and when it is needed. It will also set out the delivery mechanism to ensure the timely delivery of infrastructure. This document will be published with the final version of the plan. Policy 2(c) makes clear that planning permission will only be granted for new development if it can be demonstrated that there is, or will be, sufficient infrastructure capacity to support and meet growth requirements.
1803	Gail Brannan		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See response to HPPG (Gordon Turpin)
1805	Robert Tatam		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See response to HPPG (Gordon Turpin)
1815	Robert Tatam		With reference to the section (from page 61) "Highams Park Strategic Location", and policy 20.1: The proposed scale of growth in terms of the number of additional homes is an order of magnitude too great for Highams Park (and across the borough). The projected population figures from the Office of National Statistics, and the government's calculations on the number of homes required, have, I understand, been challenged in other parts of the country, but it appears not by	This comment is noted. The Council has carried out its own Strategic Housing Market Assessment, which can be found on the Local Plan evidence base section of Waltham Forest Council's website. Regarding population numbers, whilst out-migration may occur post-Brexit, it would be erroneous to assume that population figures would otherwise remain static as demographic shifts are influenced by a variety of factors such

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			Waltham Forest. The numbers of settled families that have left Waltham Forest to return to their home area within Europe, and the continuing unfortunate reduction in population in the borough, if the UK were to leave the EU, are not mentioned. The desired increase in the number of additional homes appears to be a crude multiplier of the (perhaps unreliable) projected population growth without any reference to the multi-faceted nature of the current housing crises, and thus of the variety of policies required to address them (at local and admittedly at national level).	as housing availability and costs, employment opportunities, etc.
1818	Robert Tatam		Policy 20.2 - The boundary of Highams Park should be that agreed in the Highams Park Plan.	The Highams Park Neighbourhood Plan area crosses a number of ward boundaries. These boundaries are not determined by Waltham Forest Council but are determined by the Local Government Boundary Commission for England. The Council is unaware of any proposal to re-align existing ward boundaries per the Highams Park Neighbourhood Plan area.
1915	Mr Naveen Kanji		Policy 21 of the Draft Local Plan - Highams Park Strategic Location mentionable achievement of minimum growth targets of 450 new homes. There have been numerous high density development projects in the Highams Park area in recent years and consequently residents feel a minimum of 450 additional homes is too high. This high density development will change the character of the area significantly and this does not fit with the vision of the draft Local Plan which states that one of it aims is to retain the local character of the different areas of the borough. Intensified development will seriously diminish the local character.	It is recognised that intensification could be associated with concerns about new development becoming inappropriate to their context and destroying much of what people see as valuable in their daily living environments. However, if well managed, intensification could provide positive benefits to improve the quality of local environments. The plan contains a range of policies to guide the redevelopment of sites/areas whilst prioritising the protection of local character.
1917	Mr Naveen Kanji		Highams Park Station is heart of Highams Park and the town expanded around the station. The beautiful existing station building is key to the "village" character of Highams Park District Centre and is much valued by local residents. The station car park is used frequently for community events.	The plan contains a range of policies to guide the redevelopment of local areas/sites and to ensure that new development is well integrated with local character. References to sites do not earmark them specifically for development. The

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				Council will be consulting on a Site Allocations document in the summer of 2020.
1919	Mr Naveen Kanji		I support landscaping improvements to the car park to create a more active and vibrant "town square". The redevelopment of James Yard should be conditional on the delivery of single level access from the station to Larkshall Road adjacent to the level crossing.	This comment is noted. The Council is preparing an additional local plan document on site specific allocations. This will provide opportunity to apply the policies of the plan on specific sites, providing more details on how new developments could be integrated within existing local areas.
1920	Mr Naveen Kanji		Municipal resources should be retained. Please ensure that the re-development of the listed Regal building as a cinema complex takes place.	This comment is noted. The Council is committed to working with stakeholders to ensure the completion of the Regal Cinema scheme.
1921	Mr Naveen Kanji		The Local Plan should clearly state that it is the intention to retain Hale End Library, as this is the only public amenity within the Highams Park area and is much prized by the Community.	The Local Plan does not allocate sites as this will be the subject of a Site Allocations document which will be consulted in 2020. The library is not affected by either document.
1922	Mr Naveen Kanji		In reference to Policy 32: whilst we appreciate the need for new housing, Highams Park is light suburban in character and this character is much valued by existing residents. Infill and intensification of development for a radius of 800 metres from the district centre will bring about undesirable changes in character, noise and nuisance and will make the area soulless rather than increase the vibrancy of the existing community, as people will become less connected with their neighbours and their community .	It is recognised that intensification could be associated with concerns about new development becoming inappropriate to their context and destroying much of what people see as valuable in their daily living environments. However, if well managed, intensification could provide positive benefits to improve the quality of local environments. The plan contains a range of policies to guide the redevelopment of sites/areas whilst prioritising the protection of local character.
1923	Mr Naveen Kanji		I support residential accommodation on upper levels with separate entrances; subject to the provision of proper waste storage and collection facilities. I do not support ground floor residential accommodation in Highams Park District Centre; as this is often poor quality and will fragment the centre and reduce its special character and vibrancy	This comment is noted for further discussion.

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1953	Mr Stephen Lovell		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See response to HPPG (Gordon Turpin)
2018	Peter Drew		Where will the 450 new homes be built in Highams Park and the new homes in the borough?	The Council is preparing an additional Local Plan document on site-specific allocations. This will provide opportunity to apply the policies of the Plan on specific sites, providing more details on how new developments could be integrated within existing local areas. The accompanying Brownfield Land Register will be reviewed annually.
2029	Peter Drew		What do you envisage to be the opportunities to be around the stations and in particular Highams Park station?	The Plan contains a range of policies to guide the redevelopment of local areas/sites and to ensure that new development is well integrated with local character. References to sites do not earmark them specifically for development. The Council will be consulting on a Site Allocations document in 2020.
2076	Morna Daniels		I am alarmed at your plans for the centre of Highams Park. It would be a great loss to demolish the library, as many older and young people use the computers and borrow books and the children's section seems well used. Also building over the station car park will make it very difficult to drop off people with heavy luggage or limited mobility.	The Local Plan does not allocate sites as this will be the subject of a Site Allocations document which will be consulted in 2020. Neither the library nor the station are allocated for development.
2077	Morna Daniels		The roads around the station become very congested and difficult for bus drivers, and there are often delays for bus passengers when the level crossing is closed. There just doesn't seem the capacity for more residents, or room for them on trains or buses.	This comment is noted. The Council has commissioned a Transport Study to review current road performance. The Council is committed to working with TfL in order to deliver public transport improvements.
2102	Aileen Scoular		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See response to HPPG (Gordon Turpin)

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2103	Aileen Scoular		As a long-time resident of Highams Park (19 years), I am concerned with the design and density of new residential developments around the station and the town centre. I'm especially concerned about the following: that proposed developments do not complement the existing look and feel of architecture in and around Highams Park; that existing infrastructure (in particular GP and transport services) is not being fully considered, when assessing the impact of so many new residents; that Highams Park's proximity to green space and its role as a 'gateway to the forest' is not being considered, and protected, in the same way as North Chingford.	It is recognised that intensification could be associated with concerns about new development becoming inappropriate to their context and destroying much of what people see as valuable in their daily living environments. However, if well managed intensification could provide positive benefits to improve the quality of local environments. The Plan contains a range of policies to guide the redevelopment of sites/areas whilst prioritising the protection of local character.
2104	Aileen Scoular		Is it really necessary to build on every square metre of land in and around the town centre of Highams Park? Many of the residents of Highams Park have chosen to forego fast and easy access into central London for the pleasure of living in a village-style community on the outer edge of London. Now, it seems, in future we will be living in a densely populated inner-London neighbourhood, but without the requisite improvements to transport infrastructure or social facilities.	It is recognised that intensification could be associated with concerns about new development becoming inappropriate to their context and destroying much of what people see as valuable in their daily living environments. However, if well managed intensification could provide positive benefits to improve the quality of local environments. The Plan contains a range of policies to guide the redevelopment of sites/areas whilst prioritising the protection of local character.
2105	Mrs Sheree Mear		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See response to HPPG (Gordon Turpin)
2106	Mike Schirn		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See response to HPPG (Gordon Turpin)
2108	Mike Schirn		Insofar as it impacts on Highams Park, my main concern is that your voluminous document declares that the aim of the plan is to retain 'the unique character' of Highams Park. You go on to define the 'character' as being an area occupied by Edwardian, Victorian and '30's suburban traditional homes built for families that offer the benefits of the nearby forest and decent gardens. Because in broad terms that's what it is. Yet, you choose to stuff	The Local Plan contains housing policies intended to cover a range of housing needs and types in line with the London Plan affordable housing thresholds.

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			it with unimaginative urban boxes that developers like to call 'luxury apartments'. Presumably to charge inflated prices. In fact both Endeavour and Discovery comprise mostly of yet more 1 & 2 bed apartments at ludicrous prices such as £493,000 for a three bedroom apartment and the more modestly priced £425,000 for a two bed apartment.	
2109	Mike Schirn		Two general points. Have you a 'special arrangement' with Fairview Homes? since they appear to be your builder of choice. Another point is that you sold them Naseberry Court, an NHS facility that could have been developed as a small hospital or clinical facility or possibly a new building to house a doctors surgery. Did you hold a public consultation on the future use of land that was actually a public facility? These we badly need. But no, you prefer to facilitate builders such a Fairview Homes to make fat profits on land that could be better used.	The Council has no special arrangement with any developer. In practice, development proposals are considered in accordance with the Development Plan. The Plan contains a range of policies to guide new development in local areas. All of these policies are considered in decision making, ensuring that an appropriate balance is maintained between competing objectives.
2110	Mike Schirn		Why is there no priority for 'local people' that grew up in the area. These homes are being marketed to young professionals with an emphasis on the proximity to both London and green space. My guess is that they will therefore mostly be sold to people outside the area. Your claim that they are necessary to cater for the borough's expanding population is nonsense. Since you have no claim on Foxtons or any other Tom, Dick or Harry flogging the apartments to whoever stumps up the money.	The planning system can influence the provision of housing by encouraging more to be built. However, once provided, Waltham Forest Council has no control over who can occupy such housing, particularly those offered for private sale. With regard to social housing, some control is possible but this rests with the Registered Social Landlords.
2111	Mike Schirn		How does this line-up with protecting the unique character of Highams Park, and leaving a positive impact on the community? Especially, since the local doctors surgery is struggling to cope and the schools are at capacity. What planning in this area have you made for an increasing population. To say nothing on the thorny issue of parking.	The Local Plan will be accompanied by an up-to-date Infrastructure Delivery Plan when it is published for consultation in 2020. The IDP will outline the need for schools and health services and how such needed will be met through development. The Council is committed to the reduction of private car use in the lifetime of this Local Plan. Policy 72 sets out the thresholds for car parking in the Borough in line with the Intent to Publish London Plan 2019.

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2112	Mike Schirn		While we're on the subject, Tesco's had made undertakings to provide a community facility and I understand a new doctors surgery was discussed. What happened to that. You seem to have a habit of insisting on certain ground rules, such as building houses on the Naseberry Court and then recapitulating to the needs of the developers.	Comment noted for consideration.
2113	Mike Schirn		Your claims concerning the character of Highams Park would hold more water if you had demanded a well landscaped enclave of sympathetically designed three or four bed homes with gardens built for families that had grown out of their 'apartments'. That would have made some sort of sense.	One of the key thrusts of Government policy is to make the most effective use of land. In London and, indeed, in many parts of the country, the scarcity and cost of land means that existing land must be optimised by building at high density, such as through the development of flats or apartments.
2114	Mike Schirn		On the subject of your boast concerning 'culture' as it applies to Highams Park. What has happened to the Regal. Originally, our hopes were raised when we were told that two 'art' cinemas were going to be included in the development. Now I understand that the building has been sold to yet another developer who has scrapped the idea and is demanding more flats? Hardly, fits in with the idea of a cultural expansion.	The Council is committed to working with the neighbourhood planning group and other stakeholders to secure the delivery of the Regal Cinema.
2115	Mike Schirn		Also, I remember when the council wanted to get rid of our library and squeeze it into a retail unit in Tesco's parade. You have extended its life but I have to tell you the matter has left a nasty taste in the mouth. Too often you act as an untrustworthy landlord, rather than a public benefactor. And what will Highams Park end up with? (1) Safer cleaner streets? No. (2) A decent roof over people's heads? Only for couples on a combined income of £75,000 or above. (3) Improving the life chances of all our residents? Yes, if you love overcrowding and are willing to forget the reason that you moved to Highams Park in the first place.	This comment is noted.
2116	Mike Schirn		Your report is a true reflection in of your real intentions in one central area. That is you wish to bring the city to the suburbs! What if we escaped the city expressly to live in the suburbs. In	As noted under Paragraph 7.1 of the draft Plan, the spatial approach recognises the divergent character of local areas including Highams Park and proposes a more locally distinctive

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			other words you have no intention of Highams Park or anywhere being distinctive. Your real aim is for everywhere to become like Walthamstow and Dalston. Tower Hamlets and Newham. High density buildings. Cllr Miller's proclamation of land optimisation and driving investment are surely words that belong on the market floor or on Wall Street rather than a reassuring guarantee that ensures a slow and sustained expansion in keeping with the environment.	policy response for this area. The Plan recognises the sense of community that exists in Highams Park.
2117	Mike Schirn		In all, you claim 'vision' but when you examine the results of the past and the projects currently being undertaken your clear objective is to infect Highams Park with the cancer of unsympathetic over-development resulting in yet another overcrowded urban flatland. As for the latest proposal affecting the area around Highams Park Station. The plans I have seen so far are quite out of keeping with the area and the level of development (450 homes within 800 metres of Highams Park Town Centre) will effectively radically change the look of Highams Park for the worse!	The Plan contains a range of policies to guide the redevelopment of local areas/sites and to ensure that new development is well integrated with local character. References to sites do not earmark them specifically for development. The Council will be consulting on a Site Allocations document in 2020.
2118	Sonja Klug		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See response to HPPG (Gordon Turpin)
2119	Mrs Louise Sandford		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See response to HPPG (Gordon Turpin)
2120	Mr Richard Ceeney		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See response to HPPG (Gordon Turpin)
2121	Mr John Avis		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See response to HPPG (Gordon Turpin)

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2122	Mrs Janet McArthy		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See response to HPPG (Gordon Turpin)
2123	Denver Currie		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See response to HPPG (Gordon Turpin)
2124	Ms Inga Bruce		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See response to HPPG (Gordon Turpin)
2125	Mrs Janet Charlesworth		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See response to HPPG (Gordon Turpin)
2126	John Williams		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See response to HPPG (Gordon Turpin)
2127	Neil Franklin		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See response to HPPG (Gordon Turpin)
2128	Katie Padilla Jones		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See response to HPPG (Gordon Turpin)
2129	Maria Bertarelli and Paul Malcolm		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See response to HPPG (Gordon Turpin)
2130	Linda Cox		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See response to HPPG (Gordon Turpin)
2131	Peter Richardson		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See response to HPPG (Gordon Turpin)

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2132	Rosalind Richardson		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See response to HPPG (Gordon Turpin)
2133	Rachel Naylor		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See response to HPPG (Gordon Turpin)
2134	John Fisher		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See response to HPPG (Gordon Turpin)
2135	Mrs Barbara Chapman		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See response to HPPG (Gordon Turpin)
2136	Mr and Mrs Chiswell		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See response to HPPG (Gordon Turpin)
2341	Caroline Austrie		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See response to HPPG (Gordon Turpin)
2342	Andrew Newton		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See response to HPPG (Gordon Turpin)
2343	Andrew Mathers Ford		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See response to HPPG (Gordon Turpin)
2344	John Poulter		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See response to HPPG (Gordon Turpin)
2347	Mike Chrimes		Again tall building development around the existing station would damage the character of the area, essentially that of a suburban station and shops.	It is recognised that intensification could be associated with concerns about new development becoming inappropriate to their context and destroying much of what people see as valuable in their daily living environments. However, if well

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				managed, intensification could provide positive benefits to improve the quality of local environments. The plan contains a range of policies to guide the redevelopment of sites/areas whilst prioritising the protection of local.
2377	Amelia Snare		***IN AGREEMENT WITH HPPG LETTER***	These comments are noted. See response to HPPG (Gordon Turpin)
2379	Valerie Storey		<p>***IN AGREEMENT WITH HPPG LETTER*** By way of response to the Response to Shaping the Borough 2020-2035 Consultation, I should like to support the comments raised in the letters prepared by the Highams Park Planning Group. Highams Park is a characterful area that is home to an active and vibrant community. The Local Plan should seek to enhance and support these factors but the proposals as they stand are liking to substantially change the character of the area and reduce its vibrancy. We feel any further housing development must not affect the character of this community. Highams Park has retained its unique personality for over one hundred years. It has developed into a sociable community. Inevitably if more housing is introduced into Highams Park it will affect the character of Highams Park. In particular there should not be any high rise buildings. We are very concerned that new housing developments will house new residents from outside of the area. We feel that this will inevitably cause a rise in the crime rate and corresponding drug abuse. There has been a developing shopping area in Highams Park for over one hundred years built up to cater for the employees of the Xylonite factory. The shopping area today has gone through a lean time but has begun to regenerate itself. Any plans for reshaping the borough should encourage the continuing development of the shopping area which helps give Highams Park its unique character. I urge the Council to take into</p>	The Council's response to the HPPG letter is recorded and referenced under HPPG (Gordon Turpin).

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			account these factors and not let any development plans be detrimental to the character and vibrancy of this area.	
2380	CATHY APPS		<p>***IN AGREEMENT WITH HPPG LETTER*** Hello, I want to raise my concerns as a local resident in the plans to build a minimum of 450 new homes in Highams Park (possibly on the current library site). The reasons local residents love living in Highams Park is that it has a village small community feel. Building large blocks of flats will ruin this. We also do not have any infrastructure to support more residents. Nurseries, schools, doctors, dentists are all over subscribed. The station and trains are full to capacity with overcrowding and the facilities would need to be vastly improved to support this influx. Finally the parking is terrible. Any new flats must have inbuilt underground parking as the streets cannot cope.</p>	The Council's response to the HPPG letter is recorded and referenced under HPPG (Gordon Turpin). The growth targets included in the Plan is based on evidence from the Growth Capacity Study (2019). The Council is preparing a separate development plan document on site allocations. This will provide further information on sites considered to have redevelopment potential to support the level of growth proposed.
2381	Mike Chrimes		Unlike some stations in the London area use of the station continues to grow, possibly because of changes to employment patterns and the age profile of the residents, but also improved frequency and reliability of services. The growth in footfall might have been expected to be reflected in changes in retail patterns in the neighbourhood of the station. Has this happened? It should be possible to use this data to persuade new investment.	The comments regarding transport are noted. The Council will continue to work in partnership with TfL in developing appropriate sustainable transport policies that will assist in improving Waltham Forest's bus and rail network.
2388	Mike Chrimes		The cinema at Highams Park could be a game changer but despite what's said in the report the quality of the restaurant and bar offering locally is limited as is available suitable space. Some residents are concerned about the impact on traffic. Bus service frequency may have to be improved.	This comment is noted for further consideration noting the strategic policies for the area and the general thematic policies in the Local Plan. It is proposed to include a reference to the Regal Cinema.
2396	Cheryl Wiltshire		<p>***IN AGREEMENT WITH HPPG LETTER*** I wish to record my concerns and comments against the Local Plan, and totally agree with all the HPPG comments on the draft local plan which I enclose, in particular I would like to highlight (1) the</p>	The Council's response to the HPPG letter is recorded and referenced under HPPG (Gordon Turpin). The concern raised about the impact of growth on local character is recognised - in particular that new development could become inappropriate

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			'squeezing' in of housing, creating housing that is too close together with no space, creates massive social problems, (2) the target of 450 new homes is too high, it will destroy the character of the area, (3) the total redeveloping of the station will also, I feel, destroy the area, and a key focal part of the village. Particularly used for community events.	to the existing local context. The Plan contains policies to ensure redevelopment is well managed. It contains a range of policies to guide growth and transformation of local areas to ensure that new development is carried out in harmony with its setting and makes a positive contribution to the local environment.
2397	Delia Born		***IN AGREEMENT WITH HPPG LETTER*** By way of response to the Response to Shaping the Borough 2020-2035 Consultation, I should like to support the comments raised in the attached letters prepared by the Highams Park Planning Group. Highams Park is a characterful area that is home to an active and vibrant community. The Local Plan should seek to enhance and support these factors but the proposals as they stand are liking to substantially change the character of the area and reduce its vibrancy. I support comprehensive, and ongoing, engagement by Council Officers with the Highams Park Planning Group (in its capacity as the neighbourhood development forum for the area) in drawing up a regeneration strategy for the Highams Park Area prior to publication, and consultation, on the next draft of the Local Plan.	The Council's response to the HPPG letter is recorded and referenced under HPPG (Gordon Turpin). The concern raised about the impact of growth on local character is recognised - in particular that new development could become inappropriate to the existing local context. The plan contains policies to ensure redevelopment is well managed. It contains a range of policies to guide growth and transformation of local areas to ensure that new development is carried out in harmony with its setting and makes a positive contribution to the local environment. The Council has declared its commitment to work with the Highams Park Planning Group to ensure a good relationship between both plans.
2426	Gina Mathews-Mesel		***IN AGREEMENT WITH HPPG LETTER*** I have been a resident of Highams Park for the last eight years. I was taken aback when I read the council's plans for the area in the borough plan. I fully support the HPPG response to the plan, please take this as my response as well.	This comment is noted and acknowledged. See response to HPPG (Gordon Turpin)
2427	Mr Nigel Mear		***IN AGREEMENT WITH HPPG LETTER*** I am writing to provide my views in response to the consultation regarding the Local Plan 2020-2035 "Shaping the Borough" I have a number of serious concerns regarding the plan, including Highams Park being identified as one of the areas for intensification with a huge minimum target for additional homes within 800 metres of Highams Park Town Centre. The targets are way too high and	The growth target included in the Plan for local areas is based on evidence from the Growth Capacity Study (2019), which considers the capacity of identified sites in local areas to deliver the proposed targets. This is an indicative target. In considering development proposals, other factors including site specific conditions and the impact on local character also apply. The plan contains a range of policies to guide new development in

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			will have a huge negative impact on the area. These targets do not even align with the vision of the draft plan which is to retain the local character of different areas. To accommodate this level of development would potentially require demolition and redevelopment of existing buildings (possibly the library, the station and some of the shopping parades in the town centre) and infill developments throughout the area. Development on such a scale would be a disaster for Highams Park and damage the character of Highams Park irreparably. Delivery of housing targets should never be achieved in such a way as to only provide minimum standards, and developments should not be 'squeezed in' which, in respect of Highams Park would adversely affect the character of the whole area to the detriment of existing residents and new residents.	local areas. All of these policies will be considered in decision making, ensuring that an appropriate balance is maintained between competing objectives - in this case delivering growth and ensuring that new development makes a positive contribution to the local environment.
2428	Katy Winter		***IN AGREEMENT WITH HPPG LETTER*** I agree entirely with the content of the HPPG letter - specifically the proposal to build c450 new homes in or close to the town centre - as a local resident living 100m from the HP town centre, I am writing to voice my absolute opposition to the scheme proposals. I agree entirely with the content of the HPPG letter submitted on this matter (dated 4 September).	The Local Plan must be in general conformity with the London Plan. The London Plan sets a housing target for the whole borough. The housing target is required to deliver housing in accessible locations near public transport, which may include the Highams Park area. The Council is currently working on a Strategic Site Allocations Development Plan Document. This will be consulted on with the community in 2020.
2429	Olivia Rumah		***IN AGREEMENT WITH HPPG LETTER***	Comment noted and acknowledged. See response to HPPG (Gordon Turpin)
2430	Chris Winter		***IN AGREEMENT WITH HPPG LETTER*** I am echoing the objections (see thread below) of my wife to the building of 450 new homes in and around Highams Park Centre. I agree entirely with the content of the HPPG letter - specifically the proposal to build c450 new homes in or close to the town centre - as a local resident living 100m from the HP town centre, I am writing to voice my absolute opposition to the	The Local Plan must be in general conformity with the London Plan. The London Plan sets a housing target for the whole borough. The housing target is required to deliver housing in accessible locations near public transport, which may include the Highams Park area. The Council is currently working on a Strategic Site Allocations Development Plan Document. This will be consulted on with the community in 2020.

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			scheme proposals. I agree entirely with the content of the HPPG letter submitted on this matter (dated 4 September).	
2431	Mrs Julia Kanji		I feel that the principles for the Local Plan should be clearer and that the Highams Park Planning Group as neighbourhood development forum should have been part of the consultation on the emerging Local Plan, so that future development is in accordance with the aspirations and aesthetic of the different groups across the Community. Finally why has the Council failed to engage with the Highams Park Planning Group regarding their regeneration proposals for Highams Park? Policies in both the extant London Plan and emerging London Plan require the Council to engage and collaborate with local stakeholders and it is critically important that the strategic plan for Highams Park reflects the views and aspirations of people local to the Highams Park Plan area. HPPG has 1,200 members and we all want the vision, policies and objectives of the Submission Version of the HP Plan to be reflected in the strategic Plan for the Highams Park Area Highams Park is both a community and a district. The draft Local Plan should also be clear as to what area within Highams Park is identified as a Strategic Location for Regeneration.	The earlier round of consultation at the Direction of Travel (Issues and Options) stage, offered the first opportunity for engagement on the contents of the Plan. Following this, the purpose of the draft Plan consultation was to allow all stakeholders, residents, community groups and indeed everyone with an interest in Waltham Forest to comment on the draft plan at the same time before the Plan is finalised. This is to allow opportunity for all competing and conflicting interests to be resolved at a single stage, rather than a series of consultation meetings with different groups and stakeholders, which clearly would have significant resource implications.
2432	Mrs Julia Kanji		Policy 21 of the Draft Local Plan - Highams Park Strategic Location mentionable achievement of minimum growth targets of 450 new homes; There have been numerous high density development projects in the Highams Park area in recent years and consequently residents feel a minimum of 450 additional homes is too high . This high density development will change the character of the area significantly and this does not fit with the vision of the draft Local Plan which states that one of it aims is to retain the local character of the different areas of the borough. Intensified development will seriously diminish the	It is recognised that intensification could be associated with concerns about new development becoming inappropriate to their context and destroying much of what people see as valuable in their daily living environments. However, if well managed, intensification could provide positive benefits to improve the quality of local environments. The plan contains a range of policies to guide the redevelopment of sites/areas whilst prioritising the protection of local character. The plan does not contain site allocations as we will be consulting on a Site Allocations document alongside the Local Plan in 2020.

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			<p>local character. I completely reject the redevelopment of the station building or buildings on the car park/access road to the station adjacent to The Avenue. Redevelopment of the station would completely destroy the character of the District Centre and, therefore, would be contrary to the vision of the emerging Local Plan. Highams Park Station is heart of Highams Park and the town expanded around the station. The beautiful existing station building is key to the "village" character of Highams Park District Centre and is much valued by local residents. The station car park is used frequently for community events. I support landscaping improvements to the car park to create a more active and vibrant "town square". The redevelopment of James Yard should be conditional on the delivery of single level access from the station to Larkshall Road adjacent to the level crossing. Municipal resources should be retained. Please ensure that the re-development of the listed Regal building as a cinema complex takes place. The Local Plan should clearly state that it is the intention to retain Hale End Library, as this is the only public amenity within the Highams Park area and is much prized by the Community.</p>	<p>There are no proposals that affect either the station or the library. Whilst Waltham Forest Council is committed to assisting stakeholders in the redevelopment of the Regal Cinema, it is not a municipal resource.</p>
2436	Jane Wheeler		<p>I am responding to the consultation on the draft new Local Plan. I live in Highams Park and the draft Plan identifies Highams Park as an area for intensification in North Waltham Forest. The Highams Park Planning Group (HPPG) has over the last five years developed policies and strategies culminating in the recent submission version of the Highams Park Plan. It is therefore surprising that according to the HPPG, the Council has not actively engaged with HPPG as a key stakeholder in formulating the strategy for the Highams Park area contained in the draft Local Plan, and that the draft Local Plan does not adequately reflect the Highams Park Plan. I support the comments submitted by the HPPG in their letter of 4</p>	<p>The earlier round of consultation at the Direction of Travel (Issues and Options) stage, offered the first opportunity for engagement on the contents of the plan. Following this, the purpose of the draft Plan consultation was to allow all stakeholders, residents, community groups and indeed everyone with an interest in Waltham Forest to comment on the draft plan at the same time before the plan is finalised. This is to allow opportunity for all competing and conflicting interests to be resolved at a single stage, rather than a series of consultation meetings with different groups and stakeholders, which clearly would have significant resource implications.</p>

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			September 2019 in response to the consultation. My other comments on the draft Plan cover the targets for new homes and the presumption in favour of small site developments	
2439	Mrs Janet McArthy		The recently built new housing in Highams Park has not addressed the needs of the homeless or people on low incomes at all! It has been largely bought through 'help to buy' at an inflated price by people who would have been able to afford a home anyway from existing street properties. For example, a two-bed flat in the Endeavour scheme was selling for £500,000 but there were older but good and larger two-bed flats for sale half a mile away for £350,000. The new proposals do not make it clear if this issue is to differently addressed with the new housing developments. The need is for council housing and maybe support for lower income people to buy older properties, rather than newly developed ones, which only really benefit the developers. But 'help to buy' was only for new properties Re-design and provision within the present Aldriche Way council estate would be a good way of improving housing for existing tenants and provision of new low rise housing for homeless and low income families.	Chapter 8 of the Local Plan sets out in policies 23-36 inclusive. These policies address Waltham Forest Council's strategic aim of providing a significant increase in the supply, choice and mix of high-quality new homes with the delivery of genuinely affordable homes a particular priority. It is a stated aim of Waltham Forest Council to enable and encourage residents to stay in the Borough in order to strengthen communities.
2443	Fiona Pickett			This comment is noted. Our responses to the Highams Park Planning Group letter can be found in our report under Highams Park Planning Group (Gordon Turpin)
2447	David Bowyer		I am writing to you to put forward my opposition to the plans to build 450 new homes in the Highams Park area. I have been a resident in the area for over 20 years and believe the local community is suffering from over development. Highams Park is a village, not a mini town and the village feel is slowly eroding.	The Strategic Location Policy for Highams Park aims to build on the character of the area and aims to enhance and support it. The design and heritage policies in the Local Plan also have a strong focus on enhancing and retaining character.
2540	Gordon Turpin	Highams Park Planning Group	There is a general feeling that the sense of community that exists in Highams Park has not been tapped into by the Council as per the emerging London Plan Policy SD10.	The Plan approach as set out for North Waltham Forest recognises the divergent character of sub areas of the borough. At a more local level, the identification of Highams Park as a strategic location seeks to promote a locally distinctive policy

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				response for this area. Accordingly, no change is proposed to the Plan, other than a recognition of the fact that Highams Park has been designated as a Neighbourhood Forum and therefore the important role of the Neighbourhood Plan in providing a more locally distinctive policy approach in general conformity to the Local Plan.
2586	Sara Doyle		***IN AGREEMENT WITH HPPG LETTER*** It's very disappointing that the council appear to have disregarded the previous findings of the HPPG, given they work so hard to promote the views of our local community.	This comment is noted. The Highams Park Planning Group is recognised by Waltham Forest Council as the group responsible for neighbourhood planning in the Highams Park area. It is noted that policy 33 picks up from themes introduced by the HPPG and Waltham Forest Council continues to work with the neighbourhood planning body.
2587	Sara Doyle		***IN AGREEMENT WITH HPPG LETTER*** As per the contents of the attached, I'd particularly like to add my own objections to any redevelopment of important community sites such as the library and the station.	The Local Plan does not allocate sites. These will be the subject of a Site Allocations document which will be consulted in 2020. The library and station are not affected by either document.
2588	Sara Doyle		***IN AGREEMENT WITH HPPG LETTER*** I appreciate new homes must be built, but the number suggested by the council in this area is too high and would be to the detriment of the local community.	The growth targets included in the plan is based on evidence from the Growth Capacity Study 2019.
2589	Kevin King		**IN AGREEMENT WITH HPPG LETTER** I am concerned about the lack of engagement with the Highams Park Planning Group in advance of the plans being developed - this seems to be completely at odds with the idea of community engagement and is concerning.	These comments are noted and our response will follow on the HPPG Letter.
2590	Kevin King		**IN AGREEMENT WITH HPPG LETTER** I would also like to see explicit reference made to the redevelopment of the cinema at the Regal - an odd omission given various statements of support from the council.	These comments are noted and our response will follow on the HPPG Letter.
2591	Kevin King		**IN AGREEMENT WITH HPPG LETTER** Highams Park residents often feel plans affecting the area are made without	These comments are noted and our response will follow on the HPPG Letter.

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			the involvement or engagement of the people that live there. This needs to happen in a more effective and meaningful way.	
2592	Roger Torode	Highams Park Forum	I wish to support the comments made by the Highams Park Planning Group. This is an area full of character with an active and vibrant community. The Local Plan should aim to enhance and support this but the proposals in your plan are liking to substantially change the character of the area and reduce its vibrancy.	These comments are noted. See Waltham Forest Council's response to the HPPG letter (Gordon Turpin).
2593	Roger Torode	Highams Park Forum	There needs to be ongoing, detailed, engagement by Council Officers with the Highams Park Planning Group, as the neighbourhood development forum for this area, to develop a regeneration strategy for the Highams Park Area. This should take place before publication and consultation on the next draft of the Local Plan.	Noted. There will be further opportunities for community engagement on the Site Allocations document and masterplan projects.
2594	Jade Holt		Highams Park is a characterful area that is home to an active and vibrant community. The Local Plan should seek to enhance and support these factors but the proposals as they stand are liking to substantially change the character of the area and reduce its vibrancy.	It is recognised that intensification could be associated with concerns about new development becoming inappropriate to their context and destroying much of what people see as valuable in their daily living environments. However, if well managed, intensification could provide positive benefits to improve the quality of local environments. The Plan contains a range of policies to guide the redevelopment of sites/areas whilst prioritising the protection of local character.
2595	Jade Holt		I support comprehensive, and ongoing, engagement by Council Officers with the Highams Park Planning Group (in its capacity as the neighbourhood development forum for the area) in drawing up a regeneration strategy for the Highams Park Area prior to publication, and consultation, on the next draft of the Local Plan.	This comment is noted.
2596	Jade Holt		The impact on the local infrastructure eg: schools and doctors would be catastrophic.	The Local Plan will be accompanied by an up to date Infrastructure Delivery Plan when it is published for consultation in 2020. The IDP will outline the need for schools

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				and health services and how such needed will be met through development.
2639	Mr David Smith		Recent developments in Highams Park have left a significant impact on infrastructure, not excluding train services, doctor appointments, road traffic, and of course schooling, where a certain local school STILL have classes consisting of over 30 pupils. I feel a minimum of 450 additional homes is way too high, and will change the character of the area significantly, as well as bringing the town to a halt, as infrastructure is already at break point.	Noted. The increased density of housing is a response to the population growth projections in the borough that will occur over the Plan period. The Council will review the policies surrounding the development of the Highams Park area and publish any update in the next draft of the Local Plan.
2646	David Bowyer		There are no plans for infrastructure including school places, doctors surgery's etc.	The Local Plan will be supported by an up-to-date Infrastructure Delivery Plan in line with the requirements of the NPPF (2019) and the Intent to Publish London Plan 2019. This document provides a framework for how the requisite infrastructure will be funded and located in order to deliver the growth required in the Local Plan.
2647	David Bowyer		In addition the parking situation in the area is at a critical stage with no CPV plans in the pipeline Highams Park is the only area on the TFL map without a CPV therefore we are overrun with vehicles parking for free for the entire day or longer if they are travelling by public transport to Stansted Airport.	The Local Plan reflects Waltham Forest Council's commitment to TfL's Healthy Streets principles and the Mayor's Transport Strategy to provide low traffic liveable neighbourhoods. Comments in relation to parking issues are noted and the Council is committed to the reduction of private car use in the lifetime of this Local Plan. Policy 72 sets out the thresholds for car parking in the borough in line with the Intent to Publish London Plan 2019, which includes the contributions that future development may make in the extension of parking controls in the borough.
2761	Mrs Janet Charlesworth		I strongly support the two submissions you have received from the Highams Park Planning Group as comments on and objections to Policy 20. 450 new homes is a large number when there are few sites available for development. You mention 800m from the town centres in Policy 31 as areas for	See response to the HPPG submission (Gordon Turpin).

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			development opportunities but your map indicating the area around Highams Park centre is woefully too small. There are precious few possibilities for significant developments in Highams Park in the 800m radius.	
2762	Mrs Janet Charlesworth		I will strongly object to any proposed high rise or densely packed new blocks as destroying the character of the area around the station and contrary to the policies of the Highams Park Neighbourhood Plan. The station building itself should not be developed as it helps define the district centre and its car park is used for markets and events. I would support redevelopment of the Aldriche Way estate but it would need extraordinary consultation with and sensitivity to the current residents there for change to be implemented.	The plan contains a range of policies to guide the redevelopment of local areas/sites and to ensure that new development is well integrated with local character. References to sites do not earmark them specifically for development. The Council is preparing an additional Local Plan document on site-specific allocations. This will provide opportunity to apply the policies of the plan on specific sites, providing more details on how new developments could be integrated within existing local areas. The Council notes the statement of support for the redevelopment of Aldriche Way Estate.
2784	Robert Tatam		Policy 20.3 - Any development opportunities at Highams Park Station should be within the footprint of the existing buildings, as the car park area is required for community events, and is important to the unencumbered sight lines when approaching or exiting the station (as well as the risk of new build partly obscuring the historic Signal Box).	This comment is noted.
2785	Robert Tatam		Policy 20.5 - Redevelopment of vacant and underused land and buildings is another policy statement that has limited value without knowing which land and which buildings are under consideration. However, I would stress it has been agreed by the Council that Hale End Library in Highams Park must remain in its existing location and footprint.	The statement is intended to underline Waltham Forest Council's positive stance in relation to development and redevelopment opportunities as they arise. The Local Plan does not allocate sites as this will be the subject of a Sites Allocation document which will be consulted in 2020. The library is not affected by either document.
2786	Robert Tatam		Policy 20.7 - "Improving walking and cycling accessibility, connectivity, permeability and legibility" is of itself a policy aspiration to be commended, but it is the case that the current, piecemeal cycling facilities were put in with part-disregard for the views of the cycling community, and the draft proposals	In line with the London Plan, Waltham Forest Council is committed to the delivery of Liveable Neighbourhoods and Healthy Streets in the borough. This means that active modes of travel and public transport will be prioritised in order to improve air quality, provide better public realm and wayfinding,

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			that might have had some inconvenience to car drivers were dropped.	reduce road danger and increase the attractiveness of the district centre to residents and visitors.
2787	Robert Tatam		Policy 20.8 is not possible to support or resist at this point, as it refers to place-making principles. However, "place-making principles" are not defined in the Glossary, nor, as far as I can see, in the text, and the definition is essential in order to comment on this phrase	This comment is noted. It proposed to clarify the meaning of the terminologies used - in this case, the reference made to place-making principles.
2869	Mr Gordon Turpin		Delivery of housing targets should not be delivered in such a way that they only provide minimum standards as this is to the detriment of the area and its residents.	The Council is preparing an additional Local Plan document on site specific allocations. This will provide opportunity to apply the policies of the plan on specific sites, providing more details on how new developments could be integrated within existing local areas.
2870	Mr Gordon Turpin		Land optimisation needs to take into consideration the existing historic context and aesthetic of the area.	The Council is preparing an additional Local Plan document on site specific allocations. This will provide opportunity to apply the policies of the Plan on specific sites, providing more details on how new developments could be integrated within existing local areas. The Plan contains a range of policies to guide new development in local areas. All of these policies will be considered in decision making, ensuring that an appropriate balance is maintained between competing objectives - in this case delivering growth and ensuring that new development makes a positive contribution to the local environment.
2871	Mr Gordon Turpin		Plan does not clearly define what is meant by Highams Park, Highams Park District Centre, Highams Park Strategic Location. The park adjacent to the lake should be referred to as "The Highams Park".	This point is noted for further clarification.
2873	Mr Gordon Turpin		Redevelopment of the Regal Cinema building is not mentioned in the plan documents.	This point is noted. It is proposed to include a reference to the Regal Cinema in Highams Park.

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2881	Jane Wheeler		<p>Targets for new homes: The Plan is very confusing on how the targets for new homes growth have been derived, their consistency and reasonableness. The plan should show for Waltham Forest as a whole, and for the designated areas such as Highams Park the current number of homes, the recent growth in homes over the last five years say, and how the target figures compare. It should explain the basis for the target figures for each designated area such as Highams Park and how the area infrastructure will support this growth. For example it is not evident why the minimum target of 450 homes for Highams Park is so high compared to North Chingford and South Chingford, or how the area infrastructure can support this. Moreover it seems that the growth targets are based on predictions of future growth using recent levels of growth which are attributable almost entirely to international migration. Whether such levels of growth will materialise must be in doubt given changes already seen with Brexit. The Council should therefore commit to annual review of the targets in the context of current population trends. The scale of development proposed will have a huge and adverse impact on the community, and it is incumbent on the Council to plan for no more than is actually needed.</p>	<p>Targets in the Local Plan have been based on where sites could come forward over the Plan period. The Local Plan will be reviewed on a yearly period with the Authority Monitoring Report as well as a statutory five-year review. In addition, Waltham Forest Council is working on a Site Allocations DPD and Infrastructure Delivery Plan, which will set out strategic sites to be allocated for development and infrastructure requirements across the borough.</p>
2987	Mr John Avis		<p>The infrastructure (schools, doctors, power supply etc) must be available before or when the need arises and not after the need has arisen. 4. The Council must not give permission (or allow by its inactivity) the conversion of ground floor shops to residential accommodation. This affects the character of Highams Park and reduces the opportunity for local employment.</p>	<p>The Local Plan will be supported by an Infrastructure Delivery Plan, which will set out details of the borough's infrastructure requirements. This document will set out what is needed, where it is needed and when it is needed. It will also set out the delivery mechanism to ensure the timely delivery of infrastructure. This document will be published with the final version of the plan. Policy 2(c) makes clear that planning permission will only be granted for new development if it can be demonstrated that there is, or will be, sufficient</p>

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				infrastructure capacity to support and meet growth requirements.
2988	Mr John Avis		The Council must make parking a requirement of any development. To assume that people won't use cars is naive. Many people, myself included, are too old to ride a cycle or walk very far. Are the disabled and infirm to be confined to their homes? Without adequate parking provision that will be the result.	Policy 72 sets out Waltham Forest Council's policy on parking. This is mindful of the growth aspirations of the plan, but also takes account of the NPPF policy to promote sustainable travel modes that limit future car use, as also included in the London Plan. Accordingly, the Local Plan proposes reduced car parking standards and encourages the use of other modes of transport, but clearly recognises the needs of all residents, including the elderly. Provision will continue to be made for disabled parking facilities.
2989	Mr John Avis		The 15min shoppers free parking should be raised to 30min. Affordable homes should be given to local people as a priority. The Council should work with the Highams Park Planning Group to implement the neighbourhood plan which it has been developing and take into consideration this plan during the implementation of the LBWF Local Plan.	The point made about shoppers free parking is noted for consideration and discussion with the Parking Control Team. This is an operational issue outside the remit of the Local Plan and best considered as part of the preparation of a town centre strategy. Policy 24 sets out Waltham Forest Council's policy on affordable housing provision. The Council has a legal duty to provide support and advice to designated neighbourhood planning forums including the Highams Park Planning Group.
2990	Mr John Avis		I support the reply, to the Local Plan, given to the Council on behalf of the Highams Park Planning Group by Gordon Turpin. After all, the Highams Park Planning Group was established to implement a neighbourhood plan on behalf of the residents of Highams Park.	This is noted. See response to HPPG (Gordon Turpin).
2991	Mr Nigel Mear		I do not support redevelopment of the Highams Park Overground station building or the car park/access road to the station adjacent to The Avenue. The station is pivotal to the village nature of Highams Park. Hale End Library must also be retained and protected. Shops should not be allowed to have ground floor residential accommodation with respect to any change of use applications. And the development of James Yard	The sites mentioned in the document have been identified as examples of under-used sites with potential for redevelopment. The Council is preparing an additional Local Plan document on site-specific allocations. This will identify the full list of sites being considered. This new document will provide opportunity to apply the policies of the plan on specific sites, providing

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Policy 20: Highams Park Strategic Location				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			should be conditional on single level access from the station to Larkshall Road adjacent to the level crossing. The local community have done so much for Highams Park over the past ten years and the draft Local Plan as it stands would have a hugely negative impact and would clearly be a disaster for the area.	more details on how new developments could be integrated within existing local areas.
2992	Mr Nigel Mear		Disappointingly it also appears there was no active engagement or consultation with the Highams Park Planning Group in the development of the Draft Plan, and the Highams Park Plan itself seems to have been disregarded completely. I am also forwarding the attached letter from the Highams Park Planning group that I understand has been sent in response to the plan. I share all the concerns raised on the letter and fully support all the comments raised on the letter in respect of the draft local plan. This letter in full is attached and this letter also forms part of my response to the Local Plan (covering a number of the points raised above in more detail).	This is noted. See response to HPPG (Gordon Turpin).

Policy 21: Sewardstone Road Strategic Location				
ID	Full Name	Organisation	Comment	Council (Officers) Response
926	Mr Mathew Frith		Part 5: We support this.	Support is welcomed and this comment is noted for further discussion.
1172	Neeru Kareer	Enfield Council	It is noted in policies 17 and 21- Sewardstone refer to the strategic location of the northern area with the prospect of delivering around 3,500 homes, along with the supporting infrastructure. Based on the number of strategic infrastructure schemes undertaken by our respective authorities, considerable	This comment is noted with reference to Waltham Forest Council's Duty to Cooperate.

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Policy 21: Sewardstone Road Strategic Location				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			effort for a joint planning is required to support sustainable growth.	
1504	Helen Monger	London Parks and Gardens Trust	LPGT welcomes the term "heritage, cultural and green assets" eg in Policies 6, 18, 19, 20, 21 and feel that this captures the spirit of good design. This term should be applied elsewhere in the plan to ensure all development meets this criteria.	Support noted.
1612	Bob Bennet		Is it realistic to describe Sewardstone Road as a "strategic location" when it comprises a couple of retail parades there is only a few shops and a McDonald's takeaway?	The Plan seeks to direct growth to the strategic locations. The distribution of growth to these areas has been informed by evidence which has considered site specific development opportunities and potential through the Growth Capacity Study (2019) and also the Characterisation and Intensification study, which has considered how new development could be accommodated at the locations where opportunities exist.
1969	Ms Rosa Ruggieri		Opposite McDonald's there were a number of local businesses, each business moved out because the properties were sold, I believe from my understanding to the Co-Op, this failed to materialise and good local business moved out leaving empty shops. So trying to improve the area did not work as nobody wanted to move there; it's not an area where you can stop and shop.	The Plan contains a range of policies to encourage the vitality and viability of designated centres and parades such as the parade of shops along Sewardstone Road.
1995	Louise Croucher		1. Achievement of minimum growth targets of 450 new homes; TOTALLY AGAINST THIS	The growth target included in the Plan for local areas is based on evidence from the Growth Capacity Study (2019), which considers the capacity of identified sites in local areas to deliver the proposed targets. This is an indicative target. In considering development proposals, other factors including site-specific conditions and the impact on local character also apply. The Plan contains a range of policies to guide new development in local areas. All of these policies will be considered in decision making, ensuring that an appropriate balance is maintained between competing objectives - in this case delivering growth

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Policy 21: Sewardstone Road Strategic Location				
ID	Full Name	Organisation	Comment	Council (Officers) Response
				and ensuring that new development makes a positive contribution to the local environment.
2310	Mike Chrimes		It is suggested the area could benefit from Crossrail 2 but this is unlikely to be delivered in the plan period, and existing public transport and cycle links to Enfield are poor as the road is so congested in the rush hour with little scope of improvement as the road is bound by two reservoirs	The issues regarding transport are noted. The Council will continue to work in partnership with TfL in developing appropriate sustainable transport policies that will assist in improving Waltham Forest's bus and rail network
2311	Mike Chrimes		It is suggested the retail offer is liked to South Chingford, yet North Chingford is closer and has better rail transport links. No mention is made of the secondary shopping centre at Valleyside, or the absence of shops on the Yardley one estate. The cycle route to both North and South Chingford is poor due to parking on Kings Head Hill and Mansfield Hill. It is difficult to see how cycling access can be improved across the Lea without a major diversion.	The issues affecting the vitality and viability of the borough's town centres and parades are complex. The plan contains policies to manage change in local areas to ensure revitalisation, adaptation and regeneration (see Policy 49). Also, see Policy 68 on the development of walking and cycling networks.
2312	Mike Chrimes		Pedestrian access across Sewardstone road is dangerous and it is unpleasant to walk along.	This comment is noted for further consideration and referral to Waltham Forest Council's Street Services Team.
2613	Mr Paul Witterick		The Sewardstone Road Area - I neither agree nor disagree with the Strategic Objective. There is too much information to sift through and process and it is all too easy to have a jerk reaction and say 'not in my back yard'. Many people are paid to deal with these infrastructure projects thus I shall leave the bigger picture to those people.	This comment is noted.

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Policy 22: North Circular Corridor Strategic Location				
ID	Full Name	Organisation	Comment	Council (Officers) Response
629	Gordon Turpin	Highams Park Planning Group	Council did not actively engage with HPPG with formulation of the headline strategy for Highams Park.	The earlier round of consultation at the Direction of Travel (Issues and Options) stage, offered the first opportunity for engagement on the contents of the plan. Following this, the purpose of the draft Plan consultation was to allow all stakeholders, residents, community groups and indeed everyone with an interest in Waltham Forest to comment on the draft plan at the same time before the plan is finalised. This is to allow opportunity for all competing and conflicting interests to be resolved at a single stage, rather than a series of consultation meetings with different groups and stakeholders, which clearly would have significant resource implications.
630	Gordon Turpin	Highams Park Planning Group	At the meeting on the 5 April 2019, LBWF suggested delaying the Examination of the HP Plan until after the then pending consultation on the Draft Local Plan due to sites identified by the Plan could conflict with those in the HP Plan. Scant details on sites being put forward for development. Why are brownfield sites in Highams Park identified by LBWF as sites for development are not included in the updated Brownfield Register.	The reason for delaying the Highams Park Neighbourhood Plan (as suggested) was to allow opportunity for the neighbourhood plan to align with the Local Plan. A neighbourhood plan must be in conformity with the Local Plan, delivering the strategic aspirations of local areas set at the higher level of the boroughwide Local Plan. A neighbourhood plan cannot determine the strategic direction of the Local Plan.
717	Mr. Gordon Turpin		Council did not actively engage with HPPG with formulation of the headline strategy for Highams Park.	This current round of consultation seeks to provide the opportunity for all stakeholders, residents, community groups and indeed everyone with an interest in Waltham Forest to comment on the draft plan at the same time before the plan is finalised. This is to allow all competing and conflicting interests to be resolved at a single stage, rather than a series of consultation meetings with different groups and stakeholders, which clearly would have significant resource implications and could have had the effect of favouring some selected groups.
765	Aviva Life and Pensions UK		Deacon Trading Estate also falls within the North Circular Corridor (Policy 22) in the draft Local Plan. The estate is probably the biggest site within this corridor in single-ownership by one of the largest long-term investors. The step-	This point is noted.

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Policy 22: North Circular Corridor Strategic Location				
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			change in context is very relevant to maximising the opportunity and the ambition which should be held for sites like Deacon Trading Estate in the foreseeable future.	
771	Aviva Life and Pensions UK		Policy 22 is much more forward-looking and recognises the potential that this corridor has. Deacon Trading Estate is one of the largest sites within this corridor - and within single-ownership by Aviva as one of the most significant institutional investors. It can contribute significantly to realising the priorities under the policy, which include: 1. Achievement of minimum growth targets of 900 new homes; 2. Provide opportunities to link to the neighbouring large scale regeneration and infrastructure investment at the adjoining Meridian Water, London Borough of Enfield; 3. Retain existing employment land (both SIL and BEA) to provide a net increase in jobs through intensification, co-location and renewal; 4. Explore the potential for mixed use intensification of retail areas along the corridor; 6. Strengthen the character and identity of the A406 corridor through design improvement measures for better safety, functional and effective connections with local places, activity hubs and communities; 7. Improve public realm and public spaces across the area and walking and cycling accessibility, connectivity, permeability and legibility to Meridian Water. (Emphasis added)	This comment is noted.
1453	Colin Setchfield	The Parish Church of Saint Edmund	The most recent Annual Pollution Map (2016) shows that the North Circular Corridor significantly fails the annual mean pollution objective, with levels of Nitrogen Dioxide (NO ₂) above 52ug/m ³ . In the light of these, how will developments along this corridor meet LBWF's commitment to "good growth" in terms of health and wellbeing?	In practice, development proposals are considered in accordance with the development plan. The plan contains a range of policies to guide new development in local areas. In particular, see Policies 59, 62, 64 of the draft Local Plan dealing with issues about pollution, design and amenity considerations. It is proposed to include a substantive policy on air quality/noise and pollution. All these policies are considered in decision making, ensuring that an appropriate balance is maintained between competing objectives - in this case

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Policy 22: North Circular Corridor Strategic Location				
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				delivering growth and ensuring that new development makes a positive contribution to the local environment and protects the amenity of occupiers.
1454	Colin Setchfield	The Parish Church of Saint Edmund	In terms of accessibility to Chingford Mount and Meridian Water, what options has LBWF investigated for bridging the A406 North Circular Road west/east, without the safety risks posed by pedestrian tunnels or the suicide risks of bridges over trunk routes?	Noted for consideration. The Council will be undertaking a masterplan of the area which will consider opportunities to improve safe access to Meridian Water.
1455	Colin Setchfield	The Parish Church of Saint Edmund	Will the proposed infill development of Chingford Hall Estate infringe on green/community space that currently exists, such as Arnett Square playground?	In practice, development proposals are considered in accordance with the development plan. The plan contains a range of policies to guide new development in local areas to protect community facilities and spaces.
1613	Bob Bennet		Priority 5: The review of Green Belt boundaries is likely to be very controversial. Furthermore it is very unclear as to the location of the brownfield land mentioned.	This point is noted. Regarding the review/release of Green Belt sites, the Council policy approach (as to be included in the final plan document) will be mindful of the strategic policy requirements of the London Plan, the findings of Waltham Forest Council's evidence base on Green Belt/MOL and the need to demonstrate exceptional circumstances.
1835	Mr John Hugill		You state that you are considering designating Green Belt to Brownfield sites to build on where exactly are you considering that?	At para 7.7 the Plan states that: "The Council is reviewing the integrity of the Green Belt boundaries in the local area with a view to de-designating brownfield land subject to the conclusions of an updated Green Belt Review." The review has focussed on parcels of land between Cooks Ferry flyover and Harbet Road on the A406 adjacent to the CostCo site.
2053	Stonecrest Marble Ltd	Stonecrest Marble Ltd	As above, our client supports the intention of the plan to provide 4,000 new homes and 1,940 new jobs within North Waltham Forest and supports the intention of the Plan to identify the North Circular Corridor, in which our client's site lies, as a focus for development.	This point is noted.
2066	Stonecrest Marble Ltd	Stonecrest Marble Ltd	Our client's site lies within the North Circular Corridor Strategic Location and development of our client's site would comply with the broad aims Policy 22, in that it would: Link to the	Regarding the review/release of Green Belt sites, Waltham Forest Council policy approach (as to be included in the final plan document) will be mindful of the strategic policy

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			neighbouring large-scale regeneration and infrastructure investment at the adjoining Meridian Water, London Borough of Enfield; Provide a net increase in jobs, adjacent to the existing SIL to the north of our clients site; and will improve public realm and public spaces across the area and walking and cycling accessibility, connectivity, permeability and legibility to Meridian Water and South Chingford District Centre. 5.39 We support the Council's commitment to reviewing Green Belt boundaries and for reasons outlined within this representation our client's site should be released from the Green Belt in order that it can be brought forward for a suitable development to meet the Council's needs for new homes and employment land.	requirements of the London Plan, the findings of the Council's evidence base on Green Belt/MOL and the need to demonstrate exceptional circumstances
2324	Mike Chrimes		I would agree that the corridor could benefit by better planning, the site alongside the old pumphouse in old hall Lane and associated land to the North Circular is an eyesore. The historic buildings could be made a feature of an attractive new development with space around. However, living alongside the North Circular is not an attractive project because of traffic noise and air pollution and it is difficult to see how 10 storey developments will meet the needs of local people and not present travel challenges, and demands on the education and social infrastructure. These need to be factored in.	The design challenges in locating development in this area are noted and appropriate mitigation measures would be considered during the application process.

Chapter 8: Decent Homes for Everyone				
ID	Full Name	Organisation	Comment	Council (Officers) Response
60	Mark Slade		The 27% Green Belt or metropolitan open land should be increased or retained- not reduced.	The Local Plan does not propose any de-designation of the Green Belt or MOL. Policy 84 sets out an approach to MOL and Green Belt that is line with the London Plan and NPPF.

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61	Mark Slade		The housing should be sympathetic to the local area	The Local Plan Chapter 14 Creating High Quality Places sets out detail design policies which aim to ensure that new buildings respect and respond to local character and local distinctiveness.
99	Mrs Beryl Lough		It states that you intend to support high density housing projects. I think before this happens you should look at the small estates you have i.e. Castle Ave Highams Park. I know of two residents in this block who are afraid to complain or leave their homes after dark because of unsociable behaviour from younger tenants. They have had a stabbing and had to request that the blood was cleared as no one done it there is constant late parties fights and youngsters driving around on bike and motor scooters this is what happens in high density housing. Not so many years ago the borough decided to do away with these blocks and build family homes now you have reversed the decision and it doesn't matter what rules go in place for tenants they are never policed or kept. I therefore object to high density housing	Noted. Any taller building will need to be in line with the policies set out in Chapter 14 Creating High Quality Places, in particular Policy 63 Taller Buildings.
101	Carrie Deane		All I can understand from the consultation is more ugly housing that looks like Clarks shoe boxes piled on top of one another. Ensures the new development reflects the area. So Wood Street looks like the inside of a shoe warehouse. What I do find extraordinary is the ability of the council to find architects who have no imagination and no skill in making a flat look attractive.	The Local Plan Chapter 14 Creating High Quality Places sets out detail design policies which aim to ensure that new buildings respect and respond to local character and local distinctiveness.
114	Sally Slade		A focus of building high quality housing for elderly - encouraging them to downsize. This should be integrated with social care. this would save money and free up larger houses. Particularly with council housing.	Agreed, this cross departmental work is already happening. The Planning Department, Housing and Adult Social Services are working together on housing older people and people with learning difficulties.
115	Sally Slade		Housing should be allocated based on need. Older people don't need three-bed houses, they need one-beds near shopping and high streets areas	Agreed, the Planning Department, Housing and Adult Social Services are working together on housing older people and people with learning difficulties.

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ID	Full Name	Organisation	Comment	Council (Officers) Response
150	Diana Hofler		"Increasing housing delivery, creating liveable places" is all well and good but people are being priced out of the area. Increased social housing provision needs to be an explicit feature of this objective.	Policies 23, 24, 25 and 26 set out the Council's policies on housing supply and the delivery of social housing.
152	Diana Hofler		I'm especially concerned that "Genuinely affordable homes" includes social rent, London affordable rent, London Living Rent and London Shared Ownership, so even the aim to have 50% genuinely affordable housing says nothing about how much social housing will be provided.	Policy .25 (Affordable Housing Tenure) sets out the percentage of different affordable housing expected from new developments.
153	Diana Hofler		This plan does not at all provide any specific goals of social rent or London affordable rent; it is completely unrealistic to think enough local people are being paid London Living Wages or are able to move towards home ownership. This prices local people out of the area.	Policy .25 (Affordable Housing Tenure) sets out the percentage of different affordable housing expected from new developments.
166	Anthony Thorne		From what I understand it appears that there is an objective to construct more residential units but there is no consideration of the problems that need to be overcome before it will be possible to have plan to meet the objective.	The plan contains a range of policies to guide new development in local areas. All these policies will be considered in decision making, ensuring that an appropriate balance is maintained between competing objectives - in this case delivering growth and ensuring that new development makes a positive contribution to the local environment, also minimising problems.
193	Miss Anna Misterska		I would like to see a bigger on building new-build homes under the Help to Buy scheme. There is a high number of young professionals in the area (HP) who want to get on the housing ladder, but they are also unlikely to qualify for social housing. I am concerned with Policy 30 about regeneration of estates. I am a leaseholder on a council-owned flat and in the last two years we have been asked to pay nearly £8,000 for various upgrades to the building. It is like asking us to pay rent on top of the mortgage to get private owners to pay for regeneration.	Noted for consideration. The Local Plan does not require Help to Buy houses to be constructed as this a nationally funded scheme.

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215	Mr Roland Karthaus	Member Architects E17	There is a repeated typo where Healthy Home is written as Health Home	Noted, the typo will be amended.
219	Mr Ben Copey		We need additional pitches for the growing Traveller community. The scale of provision outlined here is insufficient. Pitches should be given as much scrutiny and oversight as all other housing - having a single policy for this as opposed to 13 policies outlining housing is grossly biased.	The Council policy on the provision Gypsy and Traveller pitches must be informed by evidence. This information is published on the Council's website.
246	Valerie Muscutt		Stamp out rogue landlords exploiting tenants.	The Local Plan has no statutory authority over rogue landlords. However, it can set the framework for providing residents with housing choices on affordability, size and ensure that new homes are well designed.
255	Claire Watson		Good quality homes being built in the area should be encouraged, but lots of boxes of flats would not improve the area.	The Local Plan Chapter 14 Creating High Quality Places sets out detailed design policies, which aim to ensure that new buildings respect and respond to local character and local distinctiveness.
256	Claire Watson		My support for local development depends on the location and type of housing rather than raw figures.	Noted, Waltham Forest Council will be engaging and consulting on a site allocations document.
257	Claire Watson		Developing the estate at the end of Selwyn Avenue would be encouraged, but funding alternative access would also help if there are a lot of work vehicles (like for the schools development).	Policy 29 sets out the policies that will apply to the redevelopment and intensification of existing housing and housing estates. It considers design standards, quality, accessibility and safety issues.
276	Paul Burden		I believe that space standards should be as good for Build to Rent as for owner occupation.	Policy 27 deals with space standards and this applies to all developments. Purpose Built Shared Living policy provides some flexibility as this sort of residential accommodation provides large shared amenity spaces instead on private amenity space. The Local Plan sets a framework for providing residents with a range of housing choices.
277	Paul Burden		Balconies are not an adequate substitute for gardens	This point is noted. However, in practice it is difficult to ensure the provision of private garden spaces for all occupiers of residential developments.

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292	Daf Bergin		Affordable homes isn't going for enough, you need social housing for proposal on minimum wages.	Policy .25 Affordable Housing Tenure sets out the percentage of different affordable housing expected from new developments.
356	Mike Chrimes		Wholeheartedly support the idea of more affordable housing.	Noted. Policy 24 and Policy 25 set out the approach for delivering this.
357	Mike Chrimes		The suggestion of intensification of housing in the Station Road area is out of keeping with the character of the area and could only be achieved by radically changing the gateway to the Forest.	The concern raised about the impact of growth on local character is recognised - in particular that new development could become inappropriate to the existing local context. The Plan contains policies to ensure redevelopment is well managed. It contains a range of policies to guide growth and transformation of local areas to ensure that new development is carried out in harmony with its setting and makes a positive contribution to the local environment.
358	Mike Chrimes		The concept of a 'home' is undefined.	Noted for further clarification.
359	Mike Chrimes		The evidence base of housing need is unclear - is intensification what home seekers want?	The council commissioned a Strategic Housing Market Assessment, which set out the borough's housing need. This has informed the approach of the Local Plan along with the requirement to meet the housing targets as set out in the London Plan.
388	Mrs Pauline Whitbread		I am extremely concerned about the proposals to build over the bus station in Station Road and on the MOT car park test centre. I understand the need for more housing and believe that appropriate low build housing in keeping with the architecture of North Chingford could enhance the end of Station Road. However, how high will these buildings be? This is the window to our beautiful Epping Forest, the heritage to the people. The forest was bequeathed to the people by Queen Victoria, which was the reason to extend the railway line to the end of Station Road so that Queen Victoria would have a	The Council is preparing an additional Local Plan document on site specific allocations. This will provide opportunity to apply the policies of the plan on specific sites, providing more details on how new developments could be integrated within existing local areas. The Council will be consulting on a Site Allocations Development Plan Document later in 2020.

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			shorter journey to the forest. We need guarantees that the gateway to our forest will not be ruined by unsightly and tall buildings. The second plot that is targeted for planning is the car park behind the shops e.g. Boots. Once again guarantees need to be made that the poor people who have lived within the Richmond Road area will not have unsightly high rise buildings built above the car park. I am not opposing new housing but it needs to be in keeping with the area that it is intended for. Waltham Forest needs to rethink its policy for making e.g. Chingford Assembly Hall unaffordable. If it was made available at an affordable price local people would be able to afford to hire it instead of it remaining empty for weeks on end! Is the aim to knock it down or to change its character and build on top of it? 35 years ago the smaller hall was the mother and baby group where young mums would have their babies weighed and new friendships would be made with the appropriate support from the professional staff. As many of the people who were allowed to speak at the meeting that was held at St Peter's and St Paul's Church on 17 September, where over 450 people attended, all agreed that we need to ensure that the character of North Chingford is maintained.	
395	Ms Christine Hassall		The target for the number of new houses should be cut, otherwise congestion on the roads and railway will lead to a deterioration in the quality of life for everybody.	Noted for consideration. However, the target is based on objectively assessed housing need and the London Plan.
411	Ms Kate Bundock		Room sizes have been reduced, homes were somewhat larger in the developments of the '50s and '60s. A new build in Retingham Way has "all-in-one" living rooms - adequate for one-bed flats but not for family living in the two-beds. Too small for 24-7 living. Kitchens must be separate - the footprint of the block may be larger - consider health and wellbeing - TV versus washing machine noise - sight of sink or oven from an armchair etc, etc. This cannot be a popular choice. Open plan living is	Noted. Room sizes are set by national government in the National Space Standards.

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			possible in older houses with a utility room and garden access. It is not meant for social housing where may residents have social problems any way and will develop depression in such claustrophobic living conditions., especially in high-rise blocks. (I lived for some months in an open plan room in a one-bed flat with large rooms - not to be recommended.)	
430	Mrs Janet Charlesworth		See my comment on the 800m figure as it relates to Policy 20 about Highams Park. Point D in Policy 31 is ambiguous. In your statement about the 800m area and the PTAL ratings, is that an inclusive 'and' (meaning both conditions have to apply) or is it actually an 'or' (meaning only one need apply)?	The policy is based on the London Plan, which the Local Plan has to be in general conformity with.
451	Ms Sarah Chaney	Secretary Larkwood and Valley Branch Labour Party	There is not enough emphasis on sustainability. This is important both for environmental reasons (Waltham Forest has declared a climate emergency) and reducing future cost (housing stock will not need to be renewed as frequently).	Sustainability appraisal is integral to the plan making process. A sustainability appraisal report on this draft plan has been published. This is published on the Council's website.
453	Mrs Krysia Sivyer		Homes should be as attractive as possible as well as healthy and supportive for the environment and ecology. e.g. A living wall, roof gardens. I have seen flats on the continent (I believe there are also some in London) that have a small front garden and a walkway/pavement for residents to walk along. It has been very successful at building a community feel. The environment is becoming increasingly important to people and the planet, which needs to be borne in mind. Landscaping so they blend in is important too.	The plan contains a range of policies to improve the quality of design of the built environment. See policies 27, 28, 59 and 62.
468	MR Tushar Kelkar		More emphasis should be placed on encouraging long term staying power within the area - discouraging short term rent and student housing in favour of long-term renting, shared ownership, private ownership etc.	The Local Plan has policies that support long term renting choices, which are called Built To Rent. These provide a longer rental lease and higher-quality designed homes.
487	Ms Alison Hill		I agree we need more homes of varying size and affordable but don't believe this is going to happen as so far most of what I have seen is horrible tower blocks on busy roads with largely	Chapter 20 of the Plan sets out how the policies of the Plan will be delivered. This will be delivered through the development management process - the determination of planning

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			one & two bedrooms so not for families and not for long term so these blocks will be a transient population, not building communities.	applications. The Council also has a key place-shaping role to play in housing delivery by working in partnership with other partners, directly building new homes (council home building programme) and other initiatives such as facilitating access to external funding grants.
508	Ms Kate Bundock		With regards to housing - please check plans with social psychologists and community health workers. Victorian reformers were aware of the effects of close living in one-room dwellings with sleeping accommodation. Do not let your obligation to build new homes be a politico-economic exercise - you are dealing with human beings with human social needs. Social tenants are not an underclass in "vertical slums".	Noted. The Local Plan has been worked on in collaboration with Waltham Forest Council's public health team and consulted on with the NHS CCG.
510	Ms Angela Rouse		I may have missed it but I see nothing in terms of making better provisions for home owners to improve/extend their existing property so that they do not have to move as their families grow, which would see families moving out of streets where they have formed valuable relationships with their neighbours not to mention the cost of moving, which could be put towards improving the existing home.	Noted for consideration. The guidance for householder extensions was to be moved into the updated Urban Design Supplementary Planning Document.
564	Mrs Barbara Chapman		We very much doubt that the residencies you are proposing to build will be affordable to local residents. (How will this help the really needy... the homeless?)	The Local Plan Policies 24 and 25 state that of the 50% affordable housing across the borough there is an expectation that 70% will be expected to be social rented housing or affordable rented housing. Proposals to house homeless people are dealt with by Waltham Forest Council's Housing Department, which has statutory responsibility for this.
586	Mrs Sheree Mear		Concerns regarding the plan, including Highams Park being identified as one of the areas for intensification with a huge minimum target for additional homes within 800m of Highams Park Town Centre.	Noted for consideration. The 800m policy is from the London Plan, which the Local Plan must be in general conformity with.
716	Christine Sandford		We need more social rented housing, more sheltered housing and more dementia -friendly housing. You need to increase the target of genuinely affordable housing because once a	Noted, the Local Plan Policy 24 and Policy 25 set out Waltham Forest Council's approach to affordable housing. The approach taken is to increase the amount of low-cost affordable rent to

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			development starts, the developers keep coming back and saying that the percentages not viable and they negotiate it downwards. You need to be more robust in negotiating with developers. Most shared ownership is not affordable for low income households. The economic-social mix is going up and we need low income people in our borough.	70%, which includes social rent. Policy 34 of the Local Plan sets out the approach to supported and specialist housing which includes shelter. More information in relation to dementia-friendly housing will be considered as part of the Regulation 19 consultation.
888	Lauren Keeling	Planning Officer, Essex County Council	ECC notes that the LBWF's objectively assessed housing need requirement is 1,800 a year, which equates to the housing target set for LBWF by the Draft London Plan. It is noted that LBWF housing target is 18,000 over a 10-year period and 27,000 over a 15-year period. ECC notes that the draft London Plan sets out a housing target for 10 years 2019 -2029, and the Draft Local Plan is to 2035, therefore exceeds the London Plan's clear housing target. It is noted that the draft Local Plan, has sought to ensure the per annum housing need figure is projected forward. However, in reviewing the draft London Plan ECC notes that it states - if a target is needed beyond the 10 year period (2019/20 to 2028/29) boroughs should draw on the 2017 SHLAA findings (which cover the plan period to 2041), in consultation with the GLA and should take into account any additional capacity that could be delivered as a result of any committed transport infrastructure improvements, and roll forward the housing capacity assumptions applied in the London Plan for small sites (GLA, Paragraph 4.1.8D). ECC recommends that the LBWF ensures that it is seeking to meet its full objectively assessed housing needs.	We note the ECC response. The Council has been in discussions with the GLA on its housing figures and will take account of the updated draft London Plan to reflect the change in methodology.
979	The City of London	The Conservator's of Epping Forest	Strategic Objective 1 - 'Ensure a significant increase in the supply, choice and mix of high-quality new homes, particular delivering genuinely affordable homes to enable and encourage residents to stay in the borough and strengthen communities'.	Comment noted.

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1413	Blackrock and NEAT Development		Confusing only objective which is numbered.	Comment noted in relation to document structure.
1671	London and Quadrant (L&Q)	Director	Overall, we are pleased that the DLP positively seeks opportunities for the future sustainable regeneration of LBWF, the delivery of high quality new homes and well-designed development, including tall buildings, across the borough. LBWF's priority to plan ahead for future growth so that development makes a lasting and positive impact on communities, and opens up new opportunities for the people of Waltham Forest.	The Council notes the statement of support provided on the Local Plan.
1820	Robert Tatam		Page 65 states: "A healthy home has good air quality inside and out." This is inconsistent with your proposal to build homes of up to ten storeys along the North Circular Road, as this is one of the most polluted road sections in London. On page 131, Paragraph 13.3, when considering some of the impacts of poor air quality, you state "will restrict use of personal motor vehicles by encouraging walking, cycling and public transport". These phrases do not follow one from another - to provide an alternative to X is not the same as restricting X. And much of the motorised traffic along the North Circular and other arterial roads in the borough is passing through; its journeys do not start or finish in Waltham Forest. Policy 63 on Taller Buildings is inconsistent with each having "safe and accessible evacuation routes"; the Fire Brigade hoses and equipment can only reach up eight floors, so buildings taller than this are potentially unsafe.	The Plan contains a range of policies to guide the redevelopment of sites/local areas, covering air quality, transport, tall buildings, etc. In determining planning applications, all of these policies are considered, ensuring that an appropriate balance is maintained.
1891	Mr Modomo Modomo	Modomo HQ	There is currently no recognition or mention of residential as a meanwhile use and Modomo request recognition of housing as a potential meanwhile use is included within the New Local Plan. There is an opportunity and requirement to expand the	In accordance with Government policy and the London Plan, the draft Local Plan seeks to increase the provision of housing on individual sites, where possible. The London Plan, which is part of the borough's development plan, also supports the

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			influence of the policy to include housing as a meanwhile use. As previously mentioned, the new Draft London Plan includes a new policy H4 'Meanwhile uses as housing'. This policy has now been through Examination in Public and is close to adoption and therefore carries significant weight. Given the requirement for Boroughs' local development documents to be in general conformity with the London Plan, there is a requirement for Waltham Forest's new local plan to consider this policy and amend the proposed draft policies on meanwhile uses to acknowledge this. We recommend that a new policy is created that specifically supports housing as a meanwhile use, in conformity with the wording of the draft London Plan policy H4.	development of housing as a meanwhile use. On this basis, and to avoid unnecessary repetition, Waltham Forest Council will consider the need to include such policy in the final Local Plan.
2024	Mr Mike Souch		Are new residential units to be offered first to the residents of Chingford, or is the intention to give them to people from outside the borough to the exclusion of local people?	The Local Plan does not have a statutory ability to require market housing to be sold to local people first. The Housing Authority has a specific local connection test relating to shared ownership and social housing to ensure that these homes are offered to local residents first.
2144	anonymous response form 1		No mention of social housing- criminal. Residents who have lived here all their lives are being shunted off to other parts of London and further afield. My daughter could not buy here and ended up in Elm Park. At 75 years of age I have lived here all my life and was only able to do so because when I bought a house I got a mortgage from the GLC. Perhaps the Mayor or the Council could help by providing mortgages	Affordable Housing Policy 24 and Policy 25 does mention social housing. New developments over ten units will be required to provide affordable housing, unless viability states otherwise. Part of this should be for affordable rent or social housing, set at social rents.
2145	anonymous response form 1		Gentrification is putting up prices and making certain areas 'no go' areas for the locals of a different class, which the council appears to be encouraging - as they get everything they ask for.	Noted.
2153	anonymous response form 3		"Intensification and higher densities in the North Chingford area" Decent homes are not intense with high densities. This aim is contradictory and your policy docs aims of creating "high quality places" and protecting and enhancing the environment.	Noted.

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2155	anonymous response form 3		Your "supporting a diverse population" comment smacks of social engineering.	Noted.
2291	S Bell		My objection/comment is about the way this council has sold off buildings/land to developers, whose objective is obviously to make a profit for themselves or shareholders. Council should provide more social housing directly.	The Council's development company Sixty Bricks is committed to delivering social housing as part of its developments.
2314	Mike Chrimes		It is unclear whether the type of housing development discussed is what is required by local residents or prospective residents.	The type of housing and housing need set out in the Local Plan is based on the borough's Strategic Housing Market Availability Assessment, the London Strategic Housing Market Availability Assessment.
2368	Sue Wildridge		I am unhappy about the proposals to put high buildings (4-6 storeys) around Leyton (Midland Road) Especially off Hainault Road and along Norlington Road. This would be oppressive in an area of two-storey houses. It would significantly affect the light in houses close by and in their gardens. In a densely developed area, people need to enjoy the little outdoor space that they have and removing sunlight from gardens would impact on them mental health of existing residents. Three-storey development in the area should be the limit. This would provide decent homes for new and existing residents.	No housing is proposed in the Local Plan. The Local Plan is a framework for assessing planning applications against.
2502	Miss Victoria Manston	Berkeley Homes, North East London	Despite the challenges, we support the Council in its aspiration to maximise the delivery of housing within the borough and hope to play a key role in achieving and exceeding the targets identified.	Noted. TWaltham Forest Council is aware of the challenges and is expecting to work with all stakeholders to achieve its housing ambitions to meet the Borough's housing need.
2743	Miss Anna Misterska		I also don't think that your current contractors offer value for money, so for any future work I would like to see robust procurement processes and a clear justification on how your preferred contractor delivers value for money.	Noted. This is not a planning issue.
2744	Miss Anna Misterska		I would like to see a bigger on building new-build homes under the Help to Buy scheme. There is a high number of young professionals in the area (HP) who want to get on the housing	Noted for consideration. The Local Plan does not require Help to Buy houses to be constructed as this a nationally funded scheme.

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			ladder, but they are also unlikely to qualify for social housing. I am concerned with Policy 30 about regeneration of estates. I am a leaseholder on a council-owned flat and in the last two years we have been asked to pay nearly £8,000 for various upgrades to the building. It is like asking us to pay rent on top of the mortgage to get private owners to pay for regeneration. I also don't think that your current contractors offer value for money, so for any future work I would like to see robust procurement processes and a clear justification on how your preferred contractor delivers value for money (VFM).	
2745	Mr Roland Karthaus	member Architects E17	Yes - There is no mention of requirements for good daylighting, which are a key component of healthy homes and proven to strongly affect mental health and wellbeing. This is an equivalent level of concern to air quality which is rightly highlighted. Acoustics are also important but these are covered in the building regulations whereas daylighting is not.	This point is noted. It is proposed to refer to these design considerations in Chapter 14 of the Plan (Creating High Quality Places).
2750	Ms Christine Hassall		The train from Chingford into Liverpool Street is only eight carriages and cannot take any more passengers at peak times. Building thousands of new houses/flats without significantly increasing the capacity on the trains is madness. There are already several tower blocks being built along this railway line (in Walthamstow), many of these people will need to use this line and given that Liverpool Street station is already at maximum capacity I just don't see how this is going to work. Your plans for walking and cycling are irrelevant for those working in the City of London. I would be interested to know if any consultation with London Transport actually takes place when planning all this building of new houses. The number of passengers on the train will increase by literally thousands. In addition, travelling by car will become more unpleasant by the day.	The plan includes a commitment to work with TfL to provide supporting public transport infrastructure and services. See policies 69 and 74.

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2751	Ms Sarah Chaney	Secretary, Larkwood and Valley Branch Labour Party	Plan needs to make clearer the amount of social housing to be provided, and emphasise quality to ensure sustainability (so estate renewal is required less often) and no return to tower blocks on Chingford Hall Estate.	Social housing is set out in the affordable-housing policy and policies on design and sustainability are set out in the design chapter and the climate change chapter.
2752	Ms Sarah Chaney	Secretary, Larkwood and Valley Branch Labour Party	Explain why tower blocks in this area are mentioned in the leaflet but not in plan.	The Plan seeks to make efficient use of land through intensification and mixed-use development. Typically, intensification involves the development of a property, site or area at a higher density than currently exists. No specific reference is made to tower blocks.
2753	Ms Sarah Chaney	Secretary, Larkwood and Valley Branch Labour Party	Provide housing for key workers. Explore use of Community Land Trusts.	Policy 36 of the Draft Plan deals with community led housing, self-build and custom build housing projects.
2754	Ms Sarah Chaney	Secretary, Larkwood and Valley Branch Labour Party	ALL new buildings should be zero carbon and ensure housing built where air quality will not have impact on health (avoid around North Circular and measure quality nearby).	Noted, the Local Plan has a policy air quality and what mitigation is required for new development.
2874	Mrs Sheree Mear		The targets are way too high and will have a huge negative impact on the area. These targets do not even align with the vision of the draft plan, which is to retain the local character of different areas. To accommodate this level of development would potentially require demolition and redevelopment of existing buildings (possibly the Library, the station and some of the shopping parades in the town centre) and infill developments throughout the area. Development on such a scale would be a disaster for Highams Park and damage the character of Highams Park irreparably. Delivery of housing targets should never be achieved in such a way as to only provide minimum standards, and developments should not be	The targets are based on the housing target in London Plan and the housing need of the borough.

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			"squeezed in" which, in respect of Highams Park would adversely affect the character of the whole area to the detriment of existing residents and new residents.	
2958	London and Quadrant (L&Q)	Director	The LBWF Housing Strategy 2019-2024 places the meeting of the housing delivery target of 1,800 homes per year for the next 10 years as the foremost priority within the strategy, accompanied by the Housing Delivery Test Action Plan (July 2019). The measures and means to achieve the sustainable delivery of homes identified throughout these documents are proactive and diligent and should be echoed throughout the DLP. Nevertheless, these measures are ambitious and wherever possible, the DLP should introduce flexibility and policies that further facilitate the delivery of such homes and sustainable growth.	The plan acknowledges the uncertainties and risk associated with delivery and takes into account the need for flexibility - to enable the growth requirements set out to be delivered within the 15 years plan period.
2959	London and Quadrant (L&Q)	Director	Local Planning Authorities should positively seek opportunities to meet the development needs of their area and Local Plans should meet objectively assessed needs with sufficient flexibility to adapt to rapid change. They should be consistent with the principles and policies of the NPPF and should be aspirational but realistic to address spatial implication of economic, social and environmental dimensions.	Comment noted. The plan acknowledges the uncertainties and risk associated with delivery and takes into account the need for flexibility - to enable the growth requirements set out to be delivered within the 15-year plan period.

Policy 23: Increasing Housing Supply				
ID	Full Name	Organisation	Comment	Council (Officers) Response
729	Mr Gordon Turpin		It is not clear how intensifying housing development meets the requirement for regeneration of the area.	The Council notes the concern expressed about the policy on intensification and its likely implications. The Plan sets out a well-managed approach to intensification. It contains a range of policies to guide the transformation of local areas and to manage the implications on climate, transport, the protection of green spaces, etc.

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Policy 23: Increasing Housing Supply				
ID	Full Name	Organisation	Comment	Council (Officers) Response
980	The City of London	The Conservator's of Epping Forest	The City Corporation understands and recognises the borough's ambitious targets for the construction of 18,000 dwellings by 2030 and 27,000 dwelling by 2035. The City Corporation supports the approaches outlined in Policy 23 regarding targeting new housing in strategic locations associated with facilities and transport hubs, but with the significant proviso of our comments on the Spatial Strategy Policies 1-4 and lack of assessment of impacts. The focus on developing brownfield land; residential intensification and optimised housing densities should ensure that calls for use of Metropolitan Green Belt Land for residential development are minimised.	The impacts of this approach have been and are being assessed by the Sustainability Appraisal, which was consulted on after the Regulation 18 consultation.
1138	Stagecoach		These policies are recognised to be generally consistent with the national planning policy and the Draft London Plan and area, therefore, supported by Stagecoach.	The support for the policy approach is noted.
1235	Rosie Sterry	Transport for London - Commercial Development	TfL CD strongly support the boroughs objective of "Focusing delivery of new housing in Waltham Forest's Strategic Locations and accessible locations around transport hubs". The landholdings listed above are suitable for development and all have high levels of public transport accessibility given their proximity to transport interchanges.	We note the responses support for new homes around transport hubs and in strategic locations further work on sites across these locations is taking place as part of the Strategic Site Allocations DPD.
1236	Rosie Sterry	Transport for London - Commercial Development	We also support the aim to increase the supply of additional homes on all suitable, appropriate and available sites, including brownfield land, surplus public sector land, encouragement of residential intensification, as well as optimisation of housing densities (part d and part e).	Noted. This is a key objective of the Local Plan.
1237	Rosie Sterry	Transport for London - Commercial Development	TfL CD agrees that the borough should be proactive in using the Brownfield Land Register to identify sites for new homes. This also aligns with DLP Policy H1 Increasing housing supply.	Noted. This is one of the ways Waltham Forest Council has identified will assist in delivery new homes.
1238	Rosie Sterry	Transport for London -	Part (h) of Policy 23 refers to support for the development of small sites to meet housing need and this is also supported.	Noted. The Council considers that small sites can play an important role in increasing the supply of new homes.

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Policy 23: Increasing Housing Supply				
ID	Full Name	Organisation	Comment	Council (Officers) Response
		Commercial Development		
1364	Blackrock and NEAT Development		We support the policy's emphasis on focusing delivery of new housing within the Strategic Locations. Part E should be amended to include 'under-utilised employment land, where appropriate' to better reflect LBWF's progressive approach to intensification and colocation of nonemployment uses such as residential.	This comment is noted, however, we consider that this policy objective is set out clearly in Policy 39 Managing Change in Designated Employment Area.
1456	Colin Setchfield	The Parish Church of Saint Edmund	Will the 50% target for genuinely affordable homes be applied to each Strategic Location, or will it be applied across the borough?	50% target for affordable housing will be applied across the borough.
1457	Colin Setchfield	The Parish Church of Saint Edmund	If the Strategic Housing Market Assessment has estimated a need for 69% of affordable housing, why has the lower 50% target been set, particularly as in the past 3 years an even lower 46% was only achieved?	The target is set at 50% to be in general conformity with the Mayor's London Plan.
1614	Bob Bennet		The policy as drafted makes no reference to meeting the needs arising from the government's policies and priorities for "Care in the Community" e.g. provision of small care homes for people with mental health issues, care for children with special needs. This is especially important bearing in mind that the amount of public provision has been dramatically reduced. Much of this need will be catered for by the conversion of normal residential dwellings. In light of this comment both paras 'F' & 'I' should be revised to reflect the need for such specialist accommodation?	This point is noted. However, the plan includes other policies that seek to encourage the provision of specialist accommodation. See policies 24, 33 and 34. Where necessary these policies would be reviewed to further acknowledge this point.
1764	Wanis Ltd	Wanis Ltd	Wanis supports the focus for new housing in the borough's strategic locations and accessible locations around transport hubs, such as at Lea Bridge.	Support noted.
2017	Peter Drew		Why are you planning to build more homes than is required by the Draft London Plan?	The London Plan only provides a housing target for a ten-year period, however, the NPPF requires that LPAs plan for the

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Policy 23: Increasing Housing Supply				
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				length of the Local Plan, which is 15 years. The target set out reflects this.
2261		St William Homes LLP	St William support the strategic objective of ensuring a significant increase in the supply, choice and mix of high quality new homes, in particular delivering genuinely affordable homes to enable and encourage residents to stay in the borough and strengthen communities. The proposal to create opportunities to deliver a minimum of 18,000 homes by 2030, and 27,000 homes by 2035 is supported.	The Council notes the statement of support provided.
2262		St William Homes LLP	To achieve this minimum requirement, the supporting text Paragraph 8.5 and 8.6 advises that the Council will need to deliver 1,300 homes per annum between 2020-2025. This increases to 2,300 per annum between 2025 to 2030 which is a significant increase in delivery. This requires optimisation of all current development sites.	The plan seeks to optimise redevelopment opportunities on all sites.
2414	Mr Roger Brown	Chair, Love North Chingford	Housing allocation reduced: 200-250 homes are proposed without justification in the AIP and this seems lower in turn than required by the London Plan.	Housing targets are based on a range of evidence bases that consider housing need and housing capacity. The housing need for the borough has been derived from the Strategic Housing Market Assessment. This has identified the borough needs 1,810 new homes per annum. The Borough's housing capacity has then been reviewed by considering reasonable sites for housing development. The growth target included in the plan for local areas is based on evidence from the Growth Capacity Study 2019, which considers the capacity of identified sites in local areas to deliver the proposed targets.
2437	Jane Wheeler		Targets for new homes The Plan is very confusing on how the targets for new homes growth have been derived, their consistency and reasonableness. The plan should show for Waltham Forest as a whole, and for the designated areas such as Highams Park the current number of homes, the recent growth in homes over the last five years say, and how the	The growth target included in the plan for local areas is based on evidence from the Growth Capacity Study 2019, which considers the capacity of identified sites in local areas to deliver the proposed targets. This is an indicative target. In considering development proposals, other factors including site specific conditions and the impact on local character also apply. The

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Policy 23: Increasing Housing Supply				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			target figures compare. It should explain the basis for the target figures for each designated area such as Highams Park and how the area infrastructure will support this growth. For example it is not evident why the minimum target of 450 homes for Highams Park is so high compared to North Chingford and South Chingford, or how the area infrastructure can support this. Moreover it seems that the growth targets are based on predictions of future growth using recent levels of growth which are attributable almost entirely to international migration. Whether such levels of growth will materialise must be in doubt given changes already seen with Brexit. The Council should therefore commit to annual review of the targets in the context of current population trends. The scale of development proposed will have a huge and adverse impact on the community, and it is incumbent on the Council to plan for no more than is actually needed.	plan contains a range of policies to guide new development in local areas. All these policies will be considered in decision making, ensuring that an appropriate balance is maintained between competing objectives - in this case delivering growth and ensuring that new development makes a positive contribution to the local environment. The Local Plan will be reviewed on a yearly period through the Authority Monitoring Report as well as the statutory five-year review of the Local Plan. The Local Plan will also be supported by an Infrastructure Delivery Plan, which will set out details of the Borough's infrastructure requirements. This document will set out what is needed, where it is needed and when it is needed. It will also set out the delivery mechanism to ensure the timely delivery of infrastructure.
2478	London Hotel Group	London Hotel Group	We note the Council's position on new housing (contained within Policies 23-29). LHG supports the delivery of housing across a range of tenures and sizes, all of which are designed to meet the needs of a mixed community.	Noted, the Council considers that the approach put forward in the Local Plan will provide the conditions for improving housing delivery, including affordable homes; and lead to a greater mix tenures and sizes.
2570	Anne Hamshaw		The Council appear to want to build more houses and commercial buildings on every available site, including station carparks, carparks near shops and our local driving test centre.	Noted. The London Plan Policy H1 requires Waltham Forest Council to optimise the potential for housing delivery on all suitable and available brownfield sites and specifically requires the Council to consider mixed-use redevelopment of car parks. In addition, the Council's Employment Land Study has found there is a need to deliver 52,000sq m of employment floorspace over the next 15 years, which the Council must ensure it supports the delivery of. The Council is currently preparing a Site Allocations Document which it will consultant on in Autumn 2020. This will set out what development will go where.

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Policy 23: Increasing Housing Supply				
ID	Full Name	Organisation	Comment	Council (Officers) Response
2804	Cllr Alan Siggers	Councillor	It is noted that Policy 24 (F) reintroduces seeking affordable housing contributions on sites of 10 units or less. There is nothing in the plan to suggest how this can be achieved in the light of the historic court ruling on this type of policy.	The historical circumstances behind this issue is noted from November 2014 when the Government issued an advisory policy stating that developments of 10 units or less should be excluded from affordable housing contributions. Since then there has been legal challenges through judicial review and also at the Court of Appeal. The effect of the Appeal Court decision in 2016 is that local authorities must have regard to national policy guidance on this issue and not to apply this requirement unless there was clear and robust evidence to justify an exception. Going forward, the Council approach to this issue will be minded by the emerging new London Plan (Policy H2). This policy makes clear that London Boroughs wishing to apply affordable housing requirements to sites capable of delivering 10 units or fewer and which have a maximum combined gross floor space of no more than 1,000 sqm should apply a tariff approach to off-site contributions rather than seeking on-site contributions. This policy also strongly encourages London Boroughs to provide the flexibility for payments to be collected prior to the occupation of development and to set policies at the local level which require cash payments in-lieu from sites of 10 units or less. Accordingly, Policy 24 (F) will be reviewed for better clarification and interpretation.

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Policy 24: Delivering genuinely affordable housing				
ID	Full Name	Organisation	Comment	Council (Officers) Response
673	Mr Peter o Kane		Para 8.1 says "A significant proportion of these new homes need to be genuinely affordable", but the words "significant" and "genuinely affordable" need to be defined for this statement to be meaningful. It is not credible to suggest that London Shared Ownership is genuinely affordable.	The Local Plan glossary sets out the definition of these terms. However, the point is noted, and the Local Plan will be updated to provide further explanation in the supporting text.
674	Mr Peter O Kane		It would seem that the London Living Rent would not be affordable, using the 30% of income threshold for the relevant households seeking such tenures (ie non-owner occupiers), by much more than 20% (at the very most 25%) of households other than those who are owner-occupiers. This 25% figure would include the 10% who may be able to afford shared ownership.	Noted for consideration.
675	Mr Peter O Kane		To inform the Local Plan there needs to be an analysis of household income in the Borough. This should provide the numbers of households within a series of income bands organised by tenure. That is not provided by the Plan documents.	Noted for consideration.

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Policy 24: Delivering genuinely affordable housing				
ID	Full Name	Organisation	Comment	Council (Officers) Response
676	Mr Peter O Kane		The Policy 25 says: "The following affordable housing tenure split will be expected on schemes over 10 units." * Low cost affordable rent - 70% * Intermediate housing products - 30%	The approach set out in the policy is in general conformity with the London Plan Policy H6. The definitions used are the ones used in the Mayor's London Plan and are in line with the definitions set out in the National Planning Policy Framework.
677	Mr Peter O Kane		No definitions are given for the individual tenures within these two tenure groups nor is any justification given for the 70:30 split. If they are to be "genuinely affordable" locally then there needs to be a read across to the borough profile of household income for non-owner-occupiers.	The comment is noted. The definitions are set out in Paragraph 8.9 of the Local Plan document on page 69. However, this policy will be updated to clearly reference the definitions and where they appropriately fit into Policy 25. This policy approach is in generally conformity with London Plan Policy H6.
678	Mr Peter O Kane		Very few people would be able to say what is the definitional distinction between London Affordable Rent and social rent, which make up 70% of all 'affordable housing'.	The definitions for affordable housing are set out on page 69 of the Local Plan and in Paragraph 8.9. They are also set out the Glossary. The definitions used are in line with the NPPF, the London Plan and GLA housing funding requirements.
679	Mr Peter O Kane		Nor is any proposed breakdown given between these two categories which, as stated, are to make up 70% of all 'affordable' housing.	Noted for consideration.
1108	Olexandra Stepaniuk		In 2016 the number of households on the borough housing waiting list was 9,600. If the borough wishes to develop 18,000 homes by 2030, then over 50% should be social rent to meet existing needs. I would like to see a stronger definition of the amount of social rent homes to be provided. Disincentives for buy to let and buy to leave should be considered as protection of the availability of homes.	The approach set out in the policy is in general conformity with the London Plan Policies H4, H5 and H6. The definitions used are the ones used in the Mayor's London Plan and are in line with the definitions set out in the National Planning Policy Framework.
1240	Rosie Sterry	Transport for London - Commercial Development	TfL CD supports the aim to achieve a housing target of 50% affordable for all new homes. This aligns with TfL's aim to deliver at least 50% of new homes as genuinely affordable housing in a range of tenures across our portfolio of London sites.	Noted, delivering genuinely affordable homes is a key objective of the Local Plan.
1241	Rosie Sterry	Transport for London - Commercial Development	With regard to Paragraph 8.13 of the supporting text more detail should be provided on what levels of contribution might be expected from minor development to give developers some clarity about what would be required from them. The policy	Noted, Waltham Forest Council is working on the policy approach for this for the Regulation 19.

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			should also allow for the economics and financial viability of the development to be taken into account given the complexity of development some small sites.	
1342	Jennefer Peters	Senior Strategic Planner, London Plan Team Greater London Authority	The Mayor welcomes the recognition of the 50% strategic target and the borough's commitment to follow the threshold approach to deliver genuinely affordable housing as set out in Policy H6 of the draft new London Plan and the intention to follow the Fast Track Route as set out in the draft new London Plan and this too is welcome.	Noted for consideration. Delivering affordable housing is a key objective of the Local Plan and the threshold approach has been successful in increasing the delivery of affordable homes.
1366	Blackrock and NEAT Development		No - New London Plan Policy H6 allows for 35% affordable housing for individual sites, subject to viability. New London Plan requires 50% affordable housing on SILs appropriate for residential uses where the scheme would result in a net loss of industrial capacity. Affordable housing target for SIL sites should be clarified to confirm 35% affordable housing provision where the scheme would preserve or improve industrial capacity or provide 50% affordable housing where the scheme would result in a net loss of industrial capacity.	The comment is noted. The Council considers the approach set out in the policy is in general conformity with the London Plan policy H4, H5 and H6.
1586	Mr Matthew Robinson		Policy 24 ("Delivering Genuinely Affordable Housing") - which allows applications to follow the Mayor's "fast-track" approach where the relevant affordable housing thresholds are met (35% as standard or 50% on public sector and industrial land). The range of affordable housing products (including Social Rent, London Affordable Rent, London Living Rent and London Shared Ownership) is also supported.	Support for this policy is noted. The approach chosen is in general conformity with the London Plan.
1766	Wanis Ltd	Wanis Ltd	For the Council to secure its objectives on appropriate SIL sites in strategic locations to both (a) deliver an intensification of existing employment uses and an increase in the quality of that employment space AND (b) deliver high density high quality housing through co-location, then there needs to be a	This comment is noted for further consideration. The policy will be under review to ensure general conformity with London Plan Policy E7 and its clauses relating to co-location.

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			recognition that such co-location of uses does raise significant viability challenges.	
1771	Wanis Ltd	Wanis Ltd	The draft policy needs to recognise the inherent viability constraints associated with delivering housing on SIL sites, with abnormal costs above and beyond standard residential-only schemes including: - lost income and displacement costs arising where there are business activities already operating on underutilised employment sites. All of the SIL sites in LBWF that are identified as potential co-location opportunities are currently occupied by businesses, and there will be costs associated with assembling/ clearing these sites ready for redevelopment to achieve co-location. - There will clearly be abnormal costs associated with designing mitigation measures to both (a) protect and secure the unfettered operation of the employment uses in response to the London Plan's 'agent of change' principles, so that the long term operation of the employment uses are not hindered by residents (reference Policy (E) and (g)); (b) design mitigation measures to protect the amenity of the new residential community from the impacts of industry (reference Policy 30 (F)); and (c) the provision of new infrastructure necessary to make former isolated industrial / employment sites suitable for housing.	This comment is noted. The policy will be under review to ensure general conformity with London Plan Policy E7 and its clauses relating to co-location. As a spatial plan, the Local Plan has to be in general conformity with the both the NPPF and the London Plan and must act as a delivery plan to achieve the targets set at national, regional and local level. In addition, the Plan must provide safeguards in the design and operation of development to protect the interests of a wide and varied range of stakeholders that include residents and employers amongst others.
1772	Wanis Ltd	Wanis Ltd	The policy needs to explicitly reference that the Council recognises the unique viability challenges associated with delivering housing on SIL sites through co-location.	This comment is noted. The policy will be under review to ensure general conformity with London Plan Policy E7 and its clauses relating to co-location.
1773	Wanis Ltd	Wanis Ltd	On such sites the first priority is to secure quality employment space and infrastructure with affordable housing a lesser, but still an important, priority.	This comment is noted for further consideration.
1774	Wanis Ltd	Wanis Ltd	Wanis recognise the need and priority for affordable housing and the principle is supported, but there are also other priorities that must be balanced with this.	The delivery of affordable housing is a key objective of the Local Plan. The Local Plan does balance and recognise the importance

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				of other forms of development and protection and enhancement of other environments.
1775	Wanis Ltd	Wanis Ltd	Without recognising the inherent costs associated with securing high density housing co-located by industry, and maintaining and strongly pushing for 50% affordable housing on SIL co-location sites, there is a very big risk that the Council will not realise its housing growth targets for industrial co-location sites, which will significantly reduce the Council's housing land supply in this regard.	The policies in the Local Plan include the provision of affordable and social housing. This comment refers to the potential use of Compulsory Purchase Orders by Waltham Forest Council.
1905	London and Quadrant (L&Q)	Director	DLP Policies 24 (Delivering Genuinely Affordable Housing L&Q) strongly supports LBWF's commitment to deliver genuinely affordable housing provision in the borough. However, as Policy 24 is currently written, there are a number of areas of concern for L&Q. Firstly, the policy appears to measure affordable housing provision by unit. The policy should be amended to align with the Mayor's Affordable Housing & Viability SPG and make it clear that affordable housing will be considered on a "by habitable room" basis. In relation to Part B (Mayor of London's Threshold Approach), it is understood that following the draft London Plan's Examination in Public (EIP) the Mayor is now moving away from 50% threshold for industrial land, recognising this requirement is stifling development and creating significant viability and deliverability issues. To ensure soundness, the draft LBWF policy should ensure consistency of Policy 24 with the emerging London Plan. It is understood that the Panel Report is due imminently and, in this regard, LBWF should consider the findings when published.	Noted this will be updated to include habitable rooms. There will still, however, be a requirement to state both habitable rooms and units in line with the London Plan policies on monitoring.
2138	anonymous response form 1		Need for council to purchase houses from rogue landlords to use for Social Housing - a major need and not mentioned in the draft plan. Help for local residents to purchase flats/houses in the area.	The Local Plan sets out a framework for assessing planning applications. The policies in the plan include those relating to affordable housing.

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2253		St William Homes LLP	Footnote 46E of the draft London Plan recognises the substantial costs of preparing surplus utilities sites for development. It therefore (inter alia) confirms that surplus utility sites will be subject to the 35% affordable housing fast track. It is recognised that some surplus utilities sites are subject to substantial decontamination, enabling and remediation costs. If it is robustly demonstrated that extraordinary decontamination, enabling or remediation costs must be incurred to bring a surplus utilities site forward for development, then a 35 percent affordable housing threshold could be applied, subject to detailed evidence, including viability evidence, being made available. Gasworks sites are therefore subject to the 35% Fastrack Route. The Mayor requires the demonstration of decontamination requirements, and that enabling or remediation costs must be incurred to bring surplus utility sites forward for development.	This comment is noted for further consideration to ensure conformity with the London Plan.
2263		St William Homes LLP	Policy 24 "Delivering genuinely affordable housing" confirms that the Council will follow the "Mayor of London Threshold Approach" to affordable housing. St William support the broad approach to the policy. However, the current drafting does not exactly follow the drafting of the London Plan H6 and should be revised to ensure conformity. For example, Policy 24(iii) refers to a Fast Track Route for Industrial Land of 50%. London Plan H6 stipulates that 50% Fastrack only occurs for Strategic Industrial Locations, Locally Significant Industrial Sites and Non-Designated Industrial Sites appropriate for residential uses in accordance with Policy E7 Industrial intensification, co-location and substitution where the scheme would result in a net loss of industrial capacity. We also note that proposed Policy 24 does not refer to Footnote 46E of the 2019 London Plan. We propose that it should to ensure conformity with the London Plan (2019). Policy H6 and Footnote 46E should be read together in	This comment is noted. The policy will be under review to ensure general conformity with London Plan Policy E7 and its clauses relating to co-location.

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			conformity with the intent of the London Plan (2019), and should not be considered separately.	
2468	The City of London	Department of the Built Environment City of London	To further support this proposal, LBWF's Policy 24 - Delivering genuinely affordable housing mirror's the Mayor of London's Policy H6 - Threshold approach to applications which sets a high affordable housing provision threshold at 50% for LSIS where "the scheme would result in a net loss of industrial capacity". Although the NSM Use Class is Sui Generis (not industrial per se) the CoLC's ambition would be to ensure an appropriate mixed-use re-development of the site, delivering the maximum viable level of affordable housing, balancing homes, employment floorspace and jobs.	Noted for consideration.
2479	London Hotel Group	London Hotel Group	We note the Council's position on new housing (contained within Policies 23-29). LHG supports the delivery of housing across a range of tenures and sizes, all of which are designed to meet the needs of a mixed community.	Noted. TWaltham Forest Council considers that the approach put forward in the Local Plan will provide the conditions for improving housing delivery, including affordable homes, and lead to a greater mix of tenures and sizes.
2506	Miss Victoria Manston	Berkley Home North East London	We support the broad approach to the policy, but consider that Policy 24 (B) (i) should refer to Footnote 46E of the London Plan (2019) to ensure conformity.	Noted. The policy will be updated to reflect the London Plan footnote 46E.
2520	OM Archer		In 2016 the number of households on the borough housing waiting list was 9,600. If the borough wishes to develop 18,000 homes by 2030, then over 50% should be social rent to meet existing needs. I would like to see a stronger definition of the amount of social rent homes to be provided.	Noted for consideration.
2521	OM Archer		Disincentives for buy-to-let and buy-to-leave should be considered as protection of the availability of homes.	The Local Plan does not have the statutory power to intervene in buy-to-let properties.
2533	Save our Suburbs Petition - supported	Chingford & Woodford Green Conservatives	See that affordable homes provided in new developments are offered first to people with a strong local connection.	The Council has a local connection test that is used when allocating affordable housing. The Local Plan does not set this, this is set by the Housing Department.

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Policy 24: Delivering genuinely affordable housing				
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	by 662 signatures			
2877	London and Quadrant (L&Q)	Director	The policy appears to measure affordable housing provision by unit. The policy should be amended to align with the Mayor's Affordable Housing & Viability SPG and make it clear that affordable housing will be considered on a "by habitable room" basis. In relation to Part B (Mayor of London's Threshold Approach), it is understood that following the draft London Plan's Examination in Public (EIP) the Mayor is now moving away from 50% threshold for industrial land, recognising this requirement is stifling development and creating significant viability and deliverability issues. To ensure soundness, the draft LBWF policy should ensure consistency of Policy 24 with the emerging London Plan. It is understood that the Panel Report is due imminently and, in this regard, LBWF should consider the findings when published.	Noted, LBWF will review its policy in relation to affordable housing and the London Plan to ensure it is in general conformity.
2944	London and Quadrant (L&Q)	Director	In relation to Part B (Mayor of London's Threshold Approach), it is understood that following the draft London Plan's Examination in Public (EIP) the Mayor is now moving away from 50% threshold for industrial land, recognising this requirement is stifling development and creating significant viability and deliverability issues. To ensure soundness, the draft LBWF policy should ensure consistency of Policy 24 with the emerging London Plan. It is understood that the Panel Report is due imminently and, in this regard, LBWF should consider the findings when published.	The comment is noted. In the Intent to Publish London Plan policy H4 A 5 still sets out that industrial land appropriate for residential use will be required to deliver at least 50% affordable housing where the scheme would result in a net loss of industrial capacity.

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Policy 25: Affordable Housing Tenure				
ID	Full Name	Organisation	Comment	Council (Officers) Response
1367	Blackrock and NEAT Development		No - New London Plan Policy H7 states 30% of affordable housing delivery should be social rent or London Affordable Rent and 30% Intermediate products. Policy H7 confirms the remaining 40% should be determined based on identified need, with the supporting text also refers to the 40% element of the tenure split to be determined having regard to viability and the need for inclusive communities. LBWF's SHMA (2017) confirms (Paragraph 8.46) circa 38% of the net future annual affordable housing need is for housing at social rented sector rent levels, with about 1% of demand for housing at London Affordable Rent levels, and 61% for intermediate tenures. Policy 25 should therefore better reflect the proportions identified. No - the suggested affordable housing tenure split does not reflect the Council's evidence base, as required by NPPF Chapter 5. The 40% element of the tenure split should be better aligned with the findings of the Council's SHMA (2017) to ensure an overall affordable housing tenure split of: c 40% Low Cost Affordable c 60% Intermediate Products	This comment is noted for consideration and review in the light of current evidence.
1637	Oliver Milne	Savills (UK) Ltd	The current wording of Policy 25 suggest that the stated tenure split is not an absolute and is open to site and scheme specific circumstances. It would be helpful if the policy set out instances where a different tenure split could be accepted by the Council (e.g. where the quantum of affordable housing proposed exceeds the Council's strategic target).	Noted. TWaltham Forest Council will consider how we can incorporate criteria that clearly sets out the circumstances.
1918			DLP Policy 25 (Affordable Housing Tenure) p70 We note the preferred tenure split in Policy 25 is set out as 70% affordable rent and 30% shared ownership. We question whether this is supported by the evidence base and how this will be kept up to date over the plan period to ensure housing needs are being met. There are also circumstances (for example to aid viability and so allow a development to come forward) that an applicant may prefer an alternative mix. This could include a higher	The policy will be updated to set out exceptional circumstances.

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Policy 25: Affordable Housing Tenure				
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			<p>proportion of shared ownership, which LBWF recognise there is still a strong need for (Paragraph 8.16 of the Local Plan). We consider Policy 25 should include flexibility for an alternative tenure mix. This would then align with the flexible approach adopted in the Mayor's Affordable Housing & Viability SPG, where a minimum of 30% affordable rent and 30% shared ownership is required with the remainder subject to negotiation on a site-by-site basis. This flexibility should also be applied to the policy's supporting text (Paragraph 8.15 and 8.16). At Paragraph 8.15 there is reference to "low cost affordable rent". The Local Plan should specify what tenures this covers, for example social rent, affordable rent, London Affordable Rent and/or London Living Rent (LLR) products. At Paragraph 8.16, it states "Delivery of low cost rental housing will be priority unless there are exceptional circumstances". LBWF should clarify what constitutes an exceptional circumstance to avoid any uncertainty when bringing forward new schemes.</p>	
2264		St William Homes LLP	<p>Policy 26 seeks a diverse range of housing. It reflects the mix within the adopted Core Strategy. St William support Policy 26(B) which allows variations to the dwelling mix where justified.</p>	<p>The Council notes the statement of support provided on Policy 26.</p>
2480	London Hotel Group	London Hotel Group	<p>We note the Council's position on new housing (contained within Policies 23-29). LHG supports the delivery of housing across a range of tenures and sizes, all of which are designed to meet the needs of a mixed community.</p>	<p>Noted. TWaltham Forest Council considers that the approach put forward in the Local Plan will provide the conditions for improving housing delivery, including affordable homes, and lead to a greater mix tenures and sizes.</p>

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Policy 26: Housing Size and Mix				
ID	Full Name	Organisation	Comment	Council (Officers) Response
680	Mr Peter O Kane		The Housing Bedroom mix in Policy 28 seems implausible and is certainly not supported by any provided evidence. For instance the three-bed + shares of 50% and 40% for social rent and LAR and intermediate tenures seem likely to be too high.	Noted for consideration. The policy will be reviewed in the light of policy H12 of the Mayor's London Plan.
1242	Rosie Sterry	Transport for London- Commercial Development	It is considered that this policy does not adhere with DLP Policy H12 which states that Boroughs should not set prescriptive dwelling size mix requirements for market and intermediate homes.	Noted, this policy will be updated in line with the London Plan.
1346	Jennefer Peters	Senior Strategic Planner, London Plan Team Greater London Authority	The provision of a range of housing sizes to meet needs is recognised and supported in the draft new London Plan. Policy H12 of the draft new London Plan enables boroughs to balance the need to optimise development against locally identified needs for a mix of housing sizes and this guidance should underpin Policy 26 of WF's draft Local Plan. For low cost rented housing products, boroughs are able to set out more prescriptive requirements, based on up-to-date evidence, in order to ensure that identified affordable housing needs are met over the plan period.	Noted. The Policy 26 will be updated in line with the London Plan.
1373	Blackrock and NEAT Development		No - New London Plan Policy H12 requires dwelling mixes to be based on robust local evidence of need. LBWF's SHMA 2017 includes table 0.1 which it appears the suggested mix for social rent/affordable rent and intermediate products is not consistent with the findings of the SHMA 2017. It is noted that in terms of market mix this follows Paragraph 27 of the LBWF SHMA (2017). No - it appears that the policy does not seek a mix based on local need, as required by NPPF paragraph 61. It is recommended that a dwelling size mix is proposed which better aligns with the findings of the LBWF SHMA 2017. Social/Affordable Rent: 30% 1bed 40% 2bed 30% 3+bed Intermediate: 30% 1bed 40% 2bed 30% 3+bed Market	Noted for consideration.
1587	Mr Matthew Robinson		Policy 26 ("Housing Size and Mix") - which, whilst seeking a preferred housing mix from schemes, allows for this to be varied on a site-by-site basis.	Noted.

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Policy 26: Housing Size and Mix				
ID	Full Name	Organisation	Comment	Council (Officers) Response
1588	Mr Matthew Robinson		Policy 39 (“Managing Change in Designated Employment Areas”) - which allows for the regeneration of Strategic Industrial Locations (“SIL”) for mixed-use development where this is part of a co-ordinated masterplan and design approach, following the principles of “no net loss” and “co-location” as established in the draft London Plan.	Noted.
1638	Oliver Milne	Savills (UK) Ltd	Whilst we strongly support the flexibility awarded by Part B of this policy, we do not think that Part A is clear enough in stating that the specified housing mix is a strategic mix sough across the entire borough. The specified mix is not necessarily relevant to each and every site and scheme. We therefore suggest the following amendments to the policy: “A diverse range of housing will be supported by: A. Providing a strategic the following mix of dwelling sizes across all tenures as follows.”	Noted for consideration.
1728	London and Quadrant (L&Q)	Director	L&Q also supports the general policy direction to improve public realm, public spaces, sustainable modes of transport (including the borough’s approach to car parking and accessible parking in DLP Policy 27, which aligns with the London Plan), improved connectivity and the requirement to apply place making principles that reflect the local area.	The support is welcome, and the comment is noted for consideration.
1776	Wanis Ltd	Wanis Ltd	Whilst part (b) of the policy allows variations to the mix, the policy should explicitly recognise that not all development sites will be appropriate to accommodate three-bed-plus family housing, particularly on SIL co-located sites.	Noted, the Council consider that there is enough flexibility in the policy to allow for exceptional circumstances.
1777	Wanis Ltd	Wanis Ltd	The mix targets should not be site-specific but strategic borough-wide targets, to ensure that three-bed-plus family housing is located in the most appropriate locations and sites in the borough.	Noted for consideration.
1924	London and Quadrant (L&Q)	Director	DLP Policy 26 (Housing Size and Mix) p.70 Policy 26 sets a prescriptive mix for dwelling sizes across all tenures. We question whether this is supported by the evidence base and how this will be kept up to date over the plan period to ensure housing needs are being met. L&Q believe the preferred mix	The policy will be amended to be in line with the London Plan and not set a prescriptive mix for market or intermediate. The affordable housing mix will be reviewed.

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Policy 26: Housing Size and Mix				
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			<p>should reflect the housing need but also ensure it does not compromise the scheme viability and ability to meet the strategic 50% affordable housing target. We are concerned that, as currently written, these percentages will be rigidly applied in decision taking. We believe it would be more appropriate if the policy were amended to make it clear that the figures referenced represent target mixes, and that each application / site will be considered on its own merits. In terms of housing sizes, the wording and subsequent intention of this draft Policy is severely restrictive, and L&Q consider there would likely be significant issues with the deliverability of schemes with such inflexible requirements. Paragraph 4.12.2 of the Draft London Plan states: "Boroughs should not set policies or guidance that require set proportions of different-sized (in terms of number of bedrooms) market or intermediate units to be delivered." Such policies are inflexible and do not necessarily meet the need for which they are required. For example, currently the proportion of three-bedroom dwellings required across the tenures is not realistic or deliverable. If a prescriptive policy were pursued, this would inevitably impact on the viability of the whole scheme, including the level of affordable housing that can be delivered. The DLP should adopt the approach taken within the Draft London Plan for consistency and fairness across the development plan (referring to paragraphs 4.12.2, 4.12.4 and 4.12.5 of the Draft London Plan). The size and mix of dwellings should be market-led, based on viability and proposed with consideration of the criteria in Part A of Policy H12 of the Draft London Plan, on a case-by-case basis. We note Waltham Forest identifies family housing as residential units that have three bedrooms or more. Increasingly it is becoming clear, that people are comfortable living as a family in two-bedroom properties. This is a change in society and culture that should be appreciated. We would</p>	

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			therefore encourage the borough to recognise that 2B4P homes can constitute family housing in the Local Plan.	
2235	Capital and Regional Plc	Capital and Regional Plc	We would contend that the approach to housing mix set out in Draft Local Plan Policy 26 is generally acceptable for areas of the borough outside of town centres and we recognise that the draft policy allows for variations to the dwelling size mix where it can be fully justified based on, inter alia, the tenures and type of housing proposed, site location and area characteristics. However, for residential schemes predominately comprising apartment units within town centres, we consider the requirement to provide 50% three-bed+ units (or 40% for shared ownership/living rent units) to be overly onerous, failing to take into account the demographic of those living within the town centre where there is generally a greater requirement for smaller units. We would therefore suggest that the policy is amended to specifically account for schemes within the town centre where there is a greater need for smaller units.	The policy will be amended to be in line with the London Plan and not set prescriptive mix for market or intermediate. The affordable housing mix will be reviewed.
2265		St William Homes LLP	Policy 27 Housing design includes (Part C) minimum standards for flatted development amenity space. This requires a minimum of 10sqm amenity space to be provided per bedroom. (e.g: two-bed flat - 20sqm, and three-bed flat - 30sqm.) This standard is not in general conformity with London Plan (2019) Policy D4 which requires a minimum of 5sq m of private outdoor space provided for 1-2 person dwellings and an extra 1 sqm should be provided for each additional occupant. Owing to the divergence between the two standards (Policy 27 is twice the area requirement of the London Plan) and the significant housing delivery that the Council expects to deliver, we suggest that the Policy 27(c)(ii) should include the wording "where possible".	The point made regarding the inclusion of the wording "where possible" to Policy 27(c)(ii) is noted for consideration.

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Policy 26: Housing Size and Mix				
ID	Full Name	Organisation	Comment	Council (Officers) Response
2481	London Hotel Group	London Hotel Group	We note the Council's position on new housing (contained within Policies 23-29). LHG supports the delivery of housing across a range of tenures and sizes, all of which are designed to meet the needs of a mixed community.	Noted, Waltham Forest Council consider that the approach put forward in the Local Plan will provide the conditions for improving housing delivery, including affordable homes; and lead to a greater mix tenures and sizes.
2507	Miss Victoria Manston	Berkeley Homes North East London	Policy 26 seeks a diverse range of housing reflecting the mix within the adopted Core Strategy. There will be site specific circumstances where variations to the dwelling mix are justifiable and we welcome this inclusion at part (B) of Policy 26.	Noted. The Council will be reviewing this policy to ensure that it is in line with the London Plan.
2523	Sal Asghar	London Borough of Waltham Forest	Cllr Khan also gives the example of the South Grove car park site: one development, Essex Brewery is very high end aimed at the Help-to-Buy to market. The neighbouring development, L&Q doesn't have quite as high specification as the Essex Brewery with a mixture of tenures including social rent and affordable housing very much aimed at a different market. What you could potentially end up with is two developments, side by side, on one site, with little interaction between the residents of the two sites. How can we promote more mixed tenure developments in the borough where poorer and more affluent live in a mixed community?	The London Plan requires a pepper potting of affordable housing. The Council will consider how this can be incorporated into the Local Plan to ensure that new development leads to genuinely mixed communities in the Borough.
2909	Barts Health NHS Trust		Considers appropriate range of other uses within the area including social and community infrastructure, retail, food and beverage, employment uses and cultural uses Barts welcomes the flexibility to include any of the aforementioned uses as part of any redevelopment but requests clarity that none of these uses are absolute requirements but rather that they will form part of a 'menu of uses' that would be acceptable in a masterplan for the site.	This comment is noted for further discussion.

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Policy 27: Housing Design				
ID	Full Name	Organisation	Comment	Council (Officers) Response
610	Colin Johnson		Sustainable housing development should include a sense for new residents of well-being and quality of life. In my opinion, in-filling among existing developments doesn't always deliver that. If you were to ask most people, whether they prefer to live for example in a terraced house with a garden or a tower block, I'm sure most people would say a terraced house. Squeezing more and more people into an already highly populated area, gives the feeling of being treated like an ant. It seems the trend is to build more tower blocks not less!	This comment is noted. Policy 27 sets out the standards that Waltham Forest Council expect to be delivered in a range of housing that includes terraced, semi-detached and detached as part of a mix of sustainably developed housing.
681	Mr Peter O'Kane		The phrase "nationally prescribed space standards" will be meaningless to most people. There needs to be concrete examples of room sizes and references to detailed documents.	Noted. The Local Plan will be updated with cross referencing to the London Plan and Housing Supplementary Planning Guidance and the National Space Standards.
682	Mr Peter O'Kane		The vagueness may be hiding a significant reduction in space standards. There needs to be more on out of dwelling storage space for flat dwellers where room sizes and storage space is at the lower end of what is allowable.	Noted. The Local Plan will be updated with cross referencing to the London Plan, Housing Supplementary Planning Guidance and the National Space Standards.
981	The City of London	The Conservator's of Epping Forest	The City Corporation would support Policy 27.B.vi, which ensures that the calculation of external amenity space includes only open space that is genuinely accessible and usable by residents.	The following section will be being updated to be in line with the Mayor's SPG on Housing Design.
988	The City of London	The Conservator's of Epping Forest	the City Corporation would welcome a specific Section 8 policy on energy use in new and existing homes which currently accounts for 14% of total UK emissions.	The Council policy on energy use in new homes is set out in Section 18 of the Local Plan. The Council will consider how it can sign post to these policies in Section 8.
1615	Bob Bennet		Paras B & C: Bearing in mind that many recently build flats do not meet anywhere near the existing private open space standards, it is considered to be more realistic to base external amenity space standards on 'qualitative' rather than 'quantitative' standards. It is also unclear as to how these standards could be meet bearing in the light of other polices to redevelop land at high density and to intensify the use of existing residential areas. i.e. policy 29.	Noted this will be amended to be in line with the space standards set out in the London Plan and the Mayor's Housing Design Supplementary Planning Guidance.

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Policy 27: Housing Design				
ID	Full Name	Organisation	Comment	Council (Officers) Response
1639	Oliver Milne	Savills (UK) Ltd	We note that the Council has carried over its minimum external space standards from the current Local Development Plan. Whilst Swan fully recognises the importance of such space, the Council's minimum standards are far greater than the GLA's minimum standards. Not only can this cause conflict between the two levels of governance, but overly generous standards can adversely impact the development potential of suitable sites. This would go against one of the core objectives of the NPPF (i.e. making effective use of land). It is considered that the Council should adopt the GLA's minimum external space standards.	Noted. This policy will be updated to be in line with the GLA's Housing Supplementary Planning Document.
1925	London and Quadrant (L&Q)	Director	DLP Policy 27 (Housing Design) p.72 Overall, we support the provisions of the policy as the standards conform with the housing standards set out under the Nationally Described Space Standards (2015), the Mayor's Housing SPG, and the Mayors Play and Informal Play and Informal Recreation SPD, with the exception of the provision of communal amenity spaces. L&Q recognise the importance of delivering private amenity space for residents, as a balcony/terrace or private garden, or if none of these options are feasible, through the consolidation of communal amenity space. Site characteristics and the local context of surrounding properties can hinder the delivery of large amounts of private amenity space, especially in high-density development. We consider that a better approach to amenity space would be to require 10sqm of amenity space per dwelling, not per bedroom, provided as either communal space or private space in accordance with the Mayors Housing SPG. Where amenity space requirements are too onerous and offer no flexibility toward site specific or contextual circumstance, they can lead to adverse design, scale and massing outcomes as well as heavily limit the amount of homes that can be delivered on sites within the borough. Therefore, such flexibility should be enshrined within local planning policies. In terms of houses,	Noted. The Local Plan will be updated with cross referencing to the London Plan and Housing Supplementary Planning Document.

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Policy 27: Housing Design				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			the minimum requirement of 50sqm of private amenity space for one- and two- bed houses and an additional 10sqm for each bedroom thereafter, is again considered too onerous and restrictive for L&Q. The Policy should be re-worded to allow flexibility and consideration of site by site circumstances.	
2021	Mrs Sharon Henry		Poorly built flats and properties that have been quickly built in the area that are now leaving residents with serious structural issues with no resolution from the contractors.	Noted.
2085	Mike Sparrow		You mention 'sensitively' designed taller buildings, or tower blocks as some would describe them. I have seen one of your 'sensitively designed' buildings go up in King's Head Hill, Alana Heights I believe it is called. It looks awful, the cheapest possible bricks which do not match any other local buildings were obviously used, the size and shape of it are not appealing to the eye and the use of grey guttering, windows and fencing helps finish off the look as very much like one of Her Majesty's prisons. The building menacingly hangs over the back gardens of so many bungalows. There is nothing 'sensitive' about it what so ever. Why would anyone in their right mind want, trust or desire the council to do anymore building in this area. I really do not know how this council had the temerity to allow that monstrosity to be built in the first place.	This comment has been noted.
2236	Capital and Regional Plc	Capital and Regional Plc	We consider the requirements of Draft Local Plan Policy 27 (which requires a minimum of 10 sqm of amenity space to be provided per bedroom) to be unrealistic, particularly with regards to residential schemes within town centres where space is often at a premium. Whilst it is recognised that the draft policy allows for the overall provision to be provided in the form of both private amenity space and communal amenity space, the overall requirement is unreasonable and exceeds the policy requirement in the emerging London Plan. We would therefore suggest the policy is amended to reflect London Plan requirements.	Noted, the Local Plan will be updated with cross referencing to the London Plan and Housing Supplementary Planning Guidance.

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Policy 27: Housing Design				
ID	Full Name	Organisation	Comment	Council (Officers) Response
2482	London Hotel Group	London Hotel Group	We note the Council's position on new housing (contained within Policies 23-29). LHG supports the delivery of housing across a range of tenures and sizes, all of which are designed to meet the needs of a mixed community.	Noted, Waltham Forest Council consider that the approach put forward in the Local Plan will provide the conditions for improving housing delivery, including affordable homes; and lead to a greater mix tenures and sizes.
2508	Miss Victoria Manston	Berkeley Homes North East London	We note at Policy 27 (C), that the minimum amenity space standards are more onerous for flatted developments than the London Plan (2019) which will have a significant impact on scheme design and deliverability of such amenity spaces which could be at the expense of optimising housing delivery. On this basis, we would suggest a relaxation of the policy with the inclusion of the words "where possible" at the end of Policy 27 (C) (ii).	Noted. The Local Plan will be updated with cross referencing to the London Plan and Housing Supplementary Planning Guidance.
2548	The City of London	Department of the Built Environment City of London	Policy 27 needs to go further where developments affect the Epping Forest SAC the local planning authority ('LPA') must consider whether development proposals in the proximity of a protected site are likely to have a significant detrimental effect on it.	Noted. The Council pays close attention to the issues surrounding the Epping Forest SC and will review the housing policies related to amenity and the provision of SANGS in larger developments.
2746	Mr Roland Karthaus	member Architects E17	Policy 28 - There should be a cross-reference to policies on high-quality design as a means of securing amenity standards and ensuring healthy homes. It is right that high amenity standards are required, but quality is as important as quantity. Often these standards cannot be met and then there should be additional emphasis on good design. - There should be support for new, innovative forms of housing to tackle health and housing issues, such as intergenerational housing Policy 35 - Extra Care provision is noted here as C3 use, However, it is usually either C2 or C3 use. This is usually determined according to the level of care provided and secured via s106.	Noted. Cross reference will be considered.
2747	Mr Roland Karthaus	member Architects E17	Clarification is needed here as to whether any Extra Care may be considered as C2 use class and on what grounds. If C2 is not considered, then it is likely that Extra Care will not be viable due to affordable housing requirements. However, if it is not clear on what basis C2 will be considered then housing that is not	Noted for consideration on accessible housing point.

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Policy 27: Housing Design				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			genuine Extra Care may be presented as such in order to avoid these obligations.	

Policy 28: Accessible and Adaptable Housing				
ID	Full Name	Organisation	Comment	Council (Officers) Response
637	Mr Gordon Turpin	Highams Park Planning Group	Appreciate the need for new housing, although the plan for intensification is at odds with vision for the district which is to increase vibrancy, Highams Park.	The Council observes that having new homes with people living in them within the area should add to the vibrancy of Highams Park.
744	Mr Gordon Turpin		Appreciate the need for new housing, although the plan for intensification is at odds with vision for the district which is to increase vibrancy.	Noted.
927	Mr Mathew Frith		Whilst we acknowledge the principles behind this policy to help accommodate housing growth, the policy needs to ensure that development of estates does not lead to the net loss of green space, which whilst not necessarily of high quality once lost is gone. In areas of deficiency of access to open space in the borough (which has significant unequal provision across the borough) such losses may lead to further adverse impacts for residents.	Noted for consideration.
928	Mr Mathew Frith		Para 8.20: We recommend that reference to 'environmental quality' should be expanded to ensure to maintain or enhance open green space provision within developed estates (or as to close to them as possible).	Noted for consideration.
1329	Ms Claire Stroud		Social housing for local people's children, who are already priced out of purchasing a property, is very much needed. Given the high proportion of elderly owner occupiers in North Chingford - low level, quality retirement properties would be a boon to helping people downsize yet stay in the area.	Noted. The Local Plan has specific policies on affordable housing, e.g. Policy 24 and Policy 25 which seek to provide more social housing. Policy 33 and Policy 34 set out approaches to delivering more suitable housing for older people.

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Policy 28: Accessible and Adaptable Housing				
ID	Full Name	Organisation	Comment	Council (Officers) Response
2483	London Hotel Group	London Hotel Group	We note the Council's position on new housing (contained within Policies 23-29). LHG supports the delivery of housing across a range of tenures and sizes, all of which are designed to meet the needs of a mixed community.	Noted, Waltham Forest Council considers that the approach put forward in the Local Plan will provide the conditions for improving housing delivery, including affordable homes; and lead to a greater mix tenures and sizes.
2748	Mr Roland Karthaus	member Architects E17	Policy 29 - M4(2) means step-free access so any scheme above one storey requires a lift, creating serious viability issues for small schemes. Should there be a size threshold for step-free access e.g. 10 units?	Noted for consideration on accessible housing point.

Policy 29: Redevelopment and intensification of existing housing and housing estates				
ID	Full Name	Organisation	Comment	Council (Officers) Response
728	Mr Gordon Turpin		It is not clear how intensifying housing development meets the requirement for regeneration of the area.	Noted for consideration.
1737	London and Quadrant (L&Q)	Director	L&Q supports DLP Policy 29's thrust to redevelop and intensify existing housing and housing estates. The policy should be bolstered, by identifying potential locations for estate regeneration and renewal over the plan period. Part D of the policy should be reworded to be more flexible to consider the viability and deliverability of regeneration schemes.	In line with the London Plan, estates will only be developed with support from residents.
2484	London Hotel Group	London Hotel Group	We note the Council's position on new housing (contained within Policies 23-29). LHG supports the delivery of housing across a range of tenures and sizes, all of which are designed to meet the needs of a mixed community.	Noted, Waltham Forest Council consider that the approach put forward in the Local Plan will provide the conditions for improving housing delivery, including affordable homes; and lead to a greater mix tenures and sizes.

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Policy 30: Other forms of housing				
ID	Full Name	Organisation	Comment	Council (Officers) Response
638	Gordon Turpin	Highams Park Planning Group	It is unclear whether intensification is allowed within 800m irrespective of the PTAL rating or only within 800m if the PTAL rating is PTAL 3-6	Noted, the Local Plan team are reviewing this criterion.
986	The City of London	The Conservator's of Epping Forest	The City Corporation would, however, oppose the apparent exemption from the provision of external amenity space and would suggest that Small Sites are subject to a similar requirement on funding external amenity space as outlined in Policy 27.B.v. It is recommended that pooled contributions are collected for smaller sites through the Community Infrastructure Levy (CIL).	The Council will review this policy to make it clear that small sites are not exempted from providing external amenity space.
1243	Rosie Sterry	Transport for London - Commercial Development	TfL CD supports the delivery of Build to Rent development in the borough in line with DLP policy H13. Build to Rent development is particularly appropriate in locations with high public transport accessibility and TfL may work with the borough to explore the potential for delivering Build to Rent development on appropriate land holdings within the borough	Noted, Waltham Forest Council consider Build to Rent plays an important role in providing quality housing choices and homes for residents in the borough.
2238	Capital and Regional Plc	Capital and Regional Plc	We support the provisions of Draft Local Plan Policy 30, which supports other forms of housing schemes where they meet the definitions of Build to Rent, Purpose Built Student Housing and Purpose-Built Shared Living Housing.	Noted. TWaltham Forest Council considers diversifying housing products available will improve housing choices in the borough for residents.

Policy 31: Small Sites				
ID	Full Name	Organisation	Comment	Council (Officers) Response
1106	Olexandra Stepaniuk		As a result of prototype intensification of a small site near my home which I consider not to be in keeping with the local character, I strongly oppose the inclusion of the word Intensification in section B of the policy, notwithstanding, the Mayor's London Plan which seeks intensification provided it is well designed and in keeping with the neighbourhood. The inclusion of the word intensification, I believe undermines the consultation process with neighbours, who may oppose	The Local Plan has to be in general conformity with the Mayor's London Plan and the in line with NPPF both of which require efficient use of land. The Mayor's London Plan requires boroughs to consider intensification as one of the routes to delivering this policy objective.

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Policy 31: Small Sites				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			increased density but, because of the use of intensification, will have their views unheeded.	
1244	Rosie Sterry	Transport for London - Commercial Development	TfL CD strongly supports the borough in applying a 'presumption in favour of small sites' and their support for 'residential intensification within 800 metres of a town centre and where there is adequate public transport accessibility (PTAL 3 - 6)'.	Noted, however, this policy has been updated in the London Plan and the policy will be amended to reflect this.
1288	Josephine Vos	Transport for London - City Planning	In line with the draft London Plan, small site development should also be supported within 800m of stations. In most cases in Waltham Forest these catchments are covered by the town centre catchments, but there is an area north of Blackhorse Road station that would not be covered by either the town centre catchment or PTAL 3-6.	Noted for consideration.
1289	Josephine Vos	Transport for London - City Planning	The wording of part D could potentially be misread to mean that small site housing development is supported in areas that are both within 800m of a town centre and are PTAL 3-6, rather than one or the other.	Noted. The policy will be updated to make this distinction clear.
1290	Josephine Vos	Transport for London - City Planning	The use of the term 'adequate public transport accessibility' to mean PTAL 3-6 could be interpreted as PTAL 0, 1 and 2 being 'inadequate' which, depending on the location, is not always the case. For instance, PTAL 2 in the south/central areas of the borough does still have good connections by bus and cycle, with rail accessible by these modes or by walking further than is captured by PTAL (960m). In some circumstances - including in the south and central areas of Waltham Forest - this is 'adequate' to support car-free development (as reflected in the parking policy later in the draft Plan). We suggest simply referring to PTAL 3-6 directly rather than assigning it as subjective description.	Noted. The policy will be updated to state only the PTAL rather than subjective description.

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Policy 31: Small Sites				
ID	Full Name	Organisation	Comment	Council (Officers) Response
1343	Jennefer Peters	Senior Strategic Planner, London Plan Team Greater London Authority	The Mayor welcomes the borough's support for small housing development as set out in Policy 31 of the emerging Local Plan but encourages proactive approaches, such as a commitment, to identify areas suitable for small housing developments and, to allocate these as part of the borough's Local Plan or to enter them on the borough's Brownfield Land Register. WF should also recognise the need to prepare design codes as set out in Policy H2A of the draft new London Plan.	Noted. The Local Plan will be updated to reflect the need to prepare design codes, where appropriate.
1458	Colin Setchfield	The Parish Church of Saint Edmund	As Public Transport Access Levels (PTAL) are less than three along the North Circular corridor, and in South Chingford (other than along the main A road routes), what potential is there for new development, or how can PTALs be brought up to level 3 or higher in these areas?	The Council is working with partners such as TfL on what the appropriate transport intervention should be in lower PTAL areas.
1616	Bob Bennet		This policy is strongly supported but recent experience suggests that in practice the Council's approach to development management makes it difficult to achieve this policy objective.	Noted. TWaltham Forest Council is considering a range of measures beyond the Local Plan to deliver on the small sites policy.
1739	London and Quadrant (L&Q)	Director	L&Q is partnering with small housing associations across London to unlock small sites and realise the capital's build potential through the Build London Partnership programme. Jointly funded by the L&Q Foundation and the Greater London Authority, the programme aims to start on 1,000 new affordable homes in London by March 2022. We therefore welcome LBWF's approach to unlocking the potential of small sites in accordance with Policy H2A (Small Housing Developments) of the Draft London Plan (2019). To improve clarity, we feel it would be useful to include the definition of "presumption in favour of small housing development" in either the glossary or the supporting text of DLP Policy 31 (Small Sites) as set out in Part C of Policy H2A. Reference should also be made to small housing development design codes.	Noted. However, this policy will be updated with the draft London Plan on small sites.

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Policy 31: Small Sites				
ID	Full Name	Organisation	Comment	Council (Officers) Response
2433			In reference to Policy 32: whilst we appreciate the need for new housing, Highams Park is light suburban in character and this character is much valued by existing residents. Infill and intensification of development for a radius of 800 metres from the district centre will bring about undesirable changes in character, noise and nuisance and will make the area soulless rather than increase the vibrancy of the existing community, as people will become less connected with their neighbours and their community. I support residential accommodation on upper levels with separate entrances; subject to the provision of proper waste storage and collection facilities. I do not support ground floor residential accommodation in Highams Park District Centre; as this is often poor quality and will fragment the centre and reduce its special character and vibrancy.	Support for the delivery new homes on upper levels is noted. However, Waltham Forest Council observes that having new homes with people living in them within the town centre should add to the vibrancy of Highams Park.
2438	jane Wheeler		Small site development Policy 31 refers to a presumption in favour of small site developments. This carries the risk that current planning controls will be relaxed for such development with potentially damaging effects on the amenity of neighbouring properties, the character of the local community and quality of housing. The Plan should articulate how this policy will safeguard existing standards, how neighbouring properties will be properly consulted on such developments and that the presumption in favour will not apply in doubtful cases eg where there is a history of failed planning applications.	The presumption in favour of small sites policy is being reviewed in light of changes to the London Plan following the EIP.
2518	OM Archer		Policy 32 As a result of prototype intensification of a small site near my home which I consider not to be in keeping with the local character, I strongly oppose the inclusion of the word Intensification in section B of the policy, notwithstanding, the Mayor's London Plan which seeks intensification provided it is well designed and in keeping with the neighbourhood. The inclusion of the word intensification, I believe undermines the consultation process with neighbours, who may oppose	Noted for consideration.

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Policy 31: Small Sites				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			increased density but, because of the use of intensification, will have their views unheeded.	

Policy 32: Housing in Multiple Occupation (HMO) and Conversions				
ID	Full Name	Organisation	Comment	Council (Officers) Response
1291	Josephine Vos	Transport for London - City Planning	We strongly welcome the requirement for conversions of homes to be car free. We request that part B iv) requires 'sufficient quantities of good quality cycle parking' on site rather than 'adequate' cycle parking. Given part v) only permits conversions in areas of PTAL 3-6, we again suggest avoiding subjective description of 'close to public transport', which can be interpreted differently by different people.	Noted. We will update the policy with these amendments.
1459	Colin Setchfield	The Parish Church of Saint Edmund	As Public Transport Access Levels (PTAL) are less than 3 along the North Circular corridor, and in South Chingford (other than along the main A road routes), what potential is there for new development, or how can PTALs be brought up to level 3 or higher in these areas?	The Council is working with partners such as TfL on what the appropriate transport intervention should be in lower PTAL areas.
1617	Bob Bennet		The Policy as drafted makes no reference to the fact that the council has adopted supplementary planning guidance that completely bans all conversions in a large part of the borough. Is that Policy being abandoned or should reference be made to it in policy 32?	The 2008 Dwelling Conversions SPD was incorporated into the Local Plan Development Management Policies policy DM6. Since 2015 an Article 4 Direction has been in place to control HMO conversions. The Council remains committed to this principle whilst recognising that in and adjacent to town centres there may be a particular need for HMO. Consideration will be given to the refining of this policy.
1618	Bob Bennet		The policy as drafted is unrealistic. Paragraph 8.24 states HMO's are expected to be located near or in town centres but in such locations it is usually impossible to provide outdoor amenity space i.e. HMO's above shops. The policy also fails to recognise the demand for rooms in HMO with self-contained facilities	Since 2015 an Article 4 Direction has been in place to control HMO conversions. The Council remains committed to this principle whilst recognising that in, and adjacent to, town centres there may be a particular need for HMO. Consideration will be given to the refining of this policy.

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Policy 32: Housing in Multiple Occupation (HMO) and Conversions				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			because the Council considers such units to be a new dwelling and not part of a HMO. This is a bizarre outcome because this means occupiers of HMO's have to put up with much poorer living conditions than needs be.	

Policy 33: Downsizing				
ID	Full Name	Organisation	Comment	Council (Officers) Response
1105	Olexandra Stepaniuk		Downsizing policy should be re -thought and re -named. Great caution should be exercised in providing homes for people to 'downsize' into. Very often what providers believe should be adequate to tempt downsizers is not considered appropriate at all by downsizers themselves allowing the policy to fail. Furthermore no older person should feel any social or political be pressurise to leave their home (for the greater good). This places unnecessary anxiety on people that can interfere with enjoyment of later life. If on the other hand attitudes are changed and rather than provide for downsizing the intention is to provide new, attractive, well designed housing appropriate for a changing demographic of an ageing population , you may find that older people will vote with their feet , and downsizing is achieved as a by -product of delivering the right sort of housing. Deep, meaningful, facilitated consultation is required with older people to understand their desires and find ways to achieve them. Especially if they conflict with current policies.	The Council will consider how best to name this policy; however, downsizing is a recognised term. Any application that comes forward for homes that older people may wish to downsize into will be subject to the same design policies in the Local Plan as conventional homes. This should assist in ensuring such homes are of high quality.
1667	Mrs Gillian Poulter		There is no mention of inbuilt requirements for downsizing opportunities for the elderly; special amenities for disabled, and lack of thought for young parents with small children in blocks that would ultimately rely on a lift for reaching the level they live. I feel the plan, if implemented would come with built in social problems such overdevelopment creates.	The downsizing units will be expected to provide the same space standards as other homes. The policy will be amended to make this clearer.

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Policy 33: Downsizing				
ID	Full Name	Organisation	Comment	Council (Officers) Response
1743	London and Quadrant (L&Q)	Director	L&Q welcome the inclusion of a downsizing policy in the DLP. However, we feel that the threshold of 150 or more dwellings under DLP Policy 33 (Downsizing) is unduly restrictive. In order to meet the borough's rising need for older people's accommodation, all manner of size and density of schemes should be considered in accordance with site-specific constraints. This is especially true if such accommodation is to be located within walking distance of town centres and other highly accessible locations where available land/brownfield sites are more scarce. If there must be a threshold, we suggest that this be lowered substantially to ten or more units to allow maximum flexibility and viability.	Noted for consideration.
2156	anonymous response form 3		Your "downsizing" section of longer doc lacks specifics.	Noted. The policy will be reviewed, and further detail added if required.
2440	Mrs Janet McArthy		There is also no mention that I can see of provision of new housing which might entice people like us to move out of our comfortable houses, which are too big for us, into smaller accommodation. We looked into moving a few years ago but couldn't find anywhere locally that we would be happy to move to. We don't want tiny houses with paved courtyard gardens, but a well designed house with pleasant medium-sized rooms, and a smallish garden. There must be hundreds of people like us and if we could happily move, it would free up a large family home for those wanting to move into larger accommodation from the smaller ones which maybe first or second-time buyers would want. Another development opportunity could be the redevelopment of the Hotel in Oak Hill. This could become a luxury development for older residents, again freeing up traditional family housing.	The Local Plan contains a specific policy on housing for downsizing. This policy sets out how developments of a certain scale will be expected to provide units for older people to downsize into.
2517	OM Archer		Downsizing policy should be re-thought and re-named. Great caution should be exercised in providing homes for people to 'downsize into. Very often what providers believe should be	Noted for consideration.

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Policy 33: Downsizing				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			adequate to tempt downsizers is not considered appropriate at all by downsizers themselves allowing the policy to fail. Furthermore no older person should feel any social or political be pressurise to leave their home (for the greater good). This places unnecessary anxiety on people that can interfere with enjoyment of later life. If on the other hand attitudes are changed and rather than provide for downsizing the intention is to provide new, attractive, well designed housing appropriate for a changing demographic of an ageing population , you may find that older people will vote with their feet, and downsizing is achieved as a by-product of delivering the right sort of housing. Deep, meaningful, facilitated consultation is required with older people to understand their desires and find ways to achieve them. Especially if they conflict with current policies.	
2749	Mr Roland Karthaus	member Architects E17	Policy 33 - the term downsizing is considered off-putting by many. To encourage people to move home, it must be communicated as a positive, beneficial choice, not a retroactive one. Suggest the term Rightsizing may be better.	Noted. However, Waltham Forest Council considers that downsizing is an industry standard terminology, well known for this type of housing.
2755	Ms Alison Hill		Downsizing is a good idea but needs to be well considered and promoted. Older people will need assurances over things such as noise levels, lifts working, access for care workers and community veg plots/ own garden space. We need a mix of ages living together but in large schemes I doubt this would work so well.	Noted for consideration.
2756	Ms Alison Hill		HMOs; I have heard good things about so restrictions on those are not always needed but monitoring is. Sheltered housing is definitely required. Although we do need more homes it seems a lot of what is getting built currently is 1 & 2 beds and not family homes. Gad to see accessible housing is going to meet the 10% target.	Noted for consideration.
2800	Cllr Alan Siggers	Councillor	Policy 33 is of concern as it anticipates only one form of housing for our older residents while accepting that the number of the older residents will increase.	The plan seeks to provide a broad range of housing choice by size and tenure. The policy referred to purposely seeks to provide opportunity for older residents who may wish to

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Policy 33: Downsizing				
ID	Full Name	Organisation	Comment	Council (Officers) Response
				downsize. It is proposed to reconsider the wording of this policy for better clarity and interpretation - Check with CM
2802	Cllr Alan Siggers	Councillor	It is recommended that as part of the WFLP, an Article 4 direction be imposed to protect bungalows in the borough. It is appreciated that this will have great effect in the north of the borough which has a larger number of bungalows. These give housing options to those requiring single storey living while helping to preserve the open nature of Chingford.	This is noted for further consideration. Local authorities can only consider the introduction of an Article 4 Direction only in those exceptional circumstances where the exercise of permitted development rights would harm local amenity, the historic environment or the proper planning of the area.

Policy 34: Supported and Specialist Accommodation				
ID	Full Name	Organisation	Comment	Council (Officers) Response
1107	Olexandra Stepaniuk		I strongly support the provision of well-designed and attractive extra care homes as providing a choice of independent accommodation for people who are becoming increasingly dependent on services. However, I consider that from the outset the additional common rooms should be designed to permit community access whilst preserving the privacy of individual homes. London joined the WHO register of Age Friendly Cities, in 2019. LBWF should announce its commitment to this. Age friendly societies need community infrastructure to become healthy.	The Council welcomes the suggestion on planning for age-friendly societies and will consider how best to include this within the Local Plan. It will also consider how best to ensure new extra-care housing provides sufficient and well-designed common-room space.
1344	Jennefer Peters	Senior Strategic Planner, London Plan Team, Greater London Authority	The draft Local Plan should set an annual requirement for specialist older persons accommodation based on local up-to-date evidence in accordance with Paragraph 4.15.5 of the draft new London Plan. In the absence of a locally evidenced annual target, the annual borough benchmark for specialist older persons housing set out in Table 4.4 of the draft new London Plan, which for WF is 110 dwellings a year should be reflected in the draft Local Plan. Suitable sites for the provision of specialist	Noted, the Local Plan will be updated to include the London Plan target for specialist older persons accommodation.

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Policy 34: Supported and Specialist Accommodation				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			housing over the plan period should be identified as part of site allocations in collaboration with providers.	
1619	Bob Bennet		The policy as drafted is completely inadequate in dealing with the needs of vulnerable persons living within the community. The policies as drafted only appear to deal with the needs of elderly people and not the much wider and more complicated needs of other vulnerable people persons in the community. The actual wording of policy 34 itself is generally appropriate in dealing with wider needs of vulnerable people, but the rest of the policy wording itself only appears to deal with the needs of elderly people. The policy needs to be completely rewritten.	Noted for consideration with a view to the inclusion of other groups whose needs would fall within the ambit of this policy.
1744	London and Quadrant (L&Q)	Director	L&Q Living support the provisions of DLP Policy 34 (Supported and Specialist Accommodation) and are keen to bolster our current developments in the borough and bring forward new supported and specialist accommodation where appropriate.	Support noted.
2519	OM Archer		I strongly support the provision of well-designed and attractive extra care homes as providing a choice of independent accommodation for people who are becoming increasingly dependent on services. However, I consider that from the outset the additional common rooms should be designed to permit community access whilst preserving the privacy of individual homes. London joined the WHO register of Age Friendly Cities, in 2019. LBWF should announce its commitment to this. Age friendly societies need community infrastructure to become healthy.	Noted for further consideration.

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Policy 35: Gypsies and Travellers				
ID	Full Name	Organisation	Comment	Council (Officers) Response
797	LVRPA	Lee Valley Regional Park Authority	Policy 35 Gypsies and Travellers seeks to protect the existing site in the Park at Folly Lane and supports the intensification of this site (along with another site, Hale Banks North) to provide extra pitches. Whilst the Authority acknowledges that the site at Folly Lane is a well established site in the Park it would expect any intensification to be contained within the existing site boundary.	Intensification has been explored within the boundary of the site within the Gypsy and Travellers Study. A planning application for any future pitch provision within or outside of the site boundary would need to be submitted and allow for a future representation.
889	Lauren Keeling	Planning Officer, Essex County Council	ECC notes that Policy 35 within the Draft Local Pan seeks to protect existing provision and intensify pitch provision on current sites. ECC recommends that the LBWF demonstrates how this matter has been discussed with neighbouring authorities including those in Essex.	The Gypsy and Travellers Study methodology included consultation with neighbouring boroughs in reaching its recommendations. The Gypsy and Travellers Study will be published in due course demonstrating this.
987	The City of London	The Conservator's of Epping Forest	The City Corporation welcomes the borough's commissioning of a Travellers Needs Assessment. It is the City Corporation experience through regular occupations, contrary to Epping Forest Byelaws, of Forest Land, especially within the borough at Mill Plain, Woodford, that there is insufficient pitch provision for Travellers.	These occupations are noted; however, they are not within the Waltham Forest borough boundary but in Redbridge.
1179	Neeru Kareer	Enfield Council	In relation to Gypsy and Traveller sites, Enfield has also commissioned a Gypsy and Travellers Accommodation Needs Assessment as part of the Council's local housing need assessment, to ensure we are planning appropriately for this community. It is noted that Waltham Forest has identified the need for two pitches under the national definition in Planning Policy for Travellers Sites. However, it is acknowledged that additional pitches would be required as part of intensification of the existing sites. Again, Enfield welcomes an opportunity to assess and discuss respective emerging supporting technical evidence, on trends and related impact on in terms of the suitable for residential development, impact on the natural environment which would not have a detrimental impact on the amenity of neighbouring or business.	Waltham Forest Council is happy to discuss this work with Enfield via Duty to Cooperate meetings.

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Policy 35: Gypsies and Travellers				
ID	Full Name	Organisation	Comment	Council (Officers) Response
1345	Jennefer Peters	Senior Strategic Planner, London Plan Team Greater London Authority	The Mayor welcomes WF's use of the new definition of gypsies and travellers as set out in draft new London Plan Policy H16. WF has conducted a needs assessment, identifying a need for seven new pitches under the new definition. With appropriate consultation WF should demonstrate how need can be met entirely through the intensification of the borough's existing sites and should be willing to work with neighbouring authorities to find the capacity to meet identified need.	Noted. The Gypsy and Travellers Study will be published with the Regulation 19.
1349	Bryce Tudball	London Borough of Haringey	The only point I was going to raise in our meeting was around Gypsy and Traveller provision and the need for you to properly address this in your Local Plan. I have reviewed your Draft Plan quickly and note your proposed approach to Gypsy and Traveller provision in Policy 35. We support Waltham Forest's policy intention to meet its needs in full.	Noted, TWaltham Forest Council is committed to work with Haringey on this on-going issue through duty to cooperate statutory requirement.
1460	Colin Setchfield	The Parish Church of Saint Edmund	What steps have been put in place to ensure the voice and opinions of gypsies and travellers are taken into consideration in the public consultation?	The Council has undertaken a Gypsy and Travelers Study, which included interviewing and visiting the pitches in the borough. Here, gypsies and travellers were given the opportunity to respond to the study and the need for future pitch provision.

Policy 36: Community- Led Housing, Self Build and Custom Build Housing				
ID	Full Name	Organisation	Comment	Council (Officers) Response
683	Mr Peter O'Kane		The failure to allocate a category within para 8.29 to Community Land Trust is surprising. CLTs freeze land costs and eliminate the scope for the escalation in land costs to lead to ever rising housing costs local people face.	Noted. This will be added in as a category.
1740	London and Quadrant (L&Q)	Director	In addition to unlocking small development sites, Build London Partnership is also exploring opportunities to facilitate community-led housing schemes which serve underrepresented groups such as LGBT+ and BAME residents associations. L&Q	Noted. TWaltham Forest Council is currently producing an approach for community-led housing for the Borough.

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Policy 36: Community- Led Housing, Self Build and Custom Build Housing				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			therefore welcome the inclusion of Policy 36 (Community-Led Housing) in the DLP and LBWF's recognition of the role that community-led housing can play in meeting the Borough's diverse housing needs. In particular, L&Q and the Build London Partnership would be keen to stay involved in any ongoing discussions around opportunities to deliver community-led housing in Waltham Forest both as part of larger developments (Part E) or as standalone sites. L&Q Living is the dedicated care and support service, which houses more than 6,500 people across London and the South East, including a mixture of care and support, housing management, and agency-managed services.	

Chapter 9: Building a Resilient and Creative Economy				
ID	Full Name	Organisation	Comment	Council (Officers) Response
211	William Austin		Studiomakers is an initiative of Outset Contemporary Art Fund. We are an advocate for the affordable workspace sector, specialising in the brokering of agreements between developers, councils and affordable workspace operators	This comment is noted.
212	William Austin		Policy 41 and 42 in the draft Waltham Forest Local Plan recognises the issues facing the affordable creative workspace sector but require further detail in how the plan can realistically and efficiently secure the terms required to establish workspaces that deliver affordability for the end user.	The Council recognises the point on the importance of affordable workspace and will continue to support the provision of affordable workspace in the borough in accordance with P Draft London Plan policy E3 Affordable Workspace. Further guidance will be set out on how this will be implemented in the Section 106 SPD. In addition, the Council has a Business Growth, Investment and Employment team that can assist in engaging with affordable workspace providers as well as provide further support for business in need of affordable and low-cost workspace in the Borough.

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ID	Full Name	Organisation	Comment	Council (Officers) Response
213	William Austin		3. 9.27 points to the use of Section 106 agreements resulting from planning applications for redevelopment. In our experience these have been the most effective tool in delivering affordable workspace.	Noted. Support welcomed.
214	William Austin		Affordability, in reality a discount from market rent, is provided in the form of a subsidy, and we feel it is the responsibility of the developer to bare that cost. With a decade of experience we here at Studiomakers are using our specific knowledge base to pioneer a detailed Section 106 model that has successfully secured long-term, truly affordable workspace for London's creative and cultural industries. We would be very willing to talk with Waltham Forest (as we have done for other boroughs) about our model, and advise on developing further guidance documentation resulting from this Local Plan.	Noted for consideration.
244	Valerie Muscutt		Businesses closing - cafes + charity shops replaced these.	Noted.
263	Nur Karatas		More business opportunities.	Noted.
264	Nur Karatas		Affordable commercial premises to let	Noted for consideration.
265	Nur Karatas		Business start-up help	Noted for consideration.
266	Nur Karatas		Work with individuals.	Noted for consideration.
267	Nur Karatas		Working with young people inspire them to open their own business not just apprenticeships or looking for a job.	Noted. The new Local Plan, once adopted through Policy 43, will: A. Require all new major developments to adhere to the Employment and Training Toolkit set out in the Planning

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				Obligations SPD by contributing towards employment, skills and training programs, apprenticeships and work placements through S106 agreements to equip residents with the skills required to gain employment; B. Support the provision of a broad range of employment and training opportunities across a variety of sectors available to local residents, including in the construction and operation phase of new developments; C. Support the growth of existing and future start-ups, SME's and businesses in key growth sectors.
268	Nur Karatas		Inspirational training to create more business	Noted.
269	Nur Karatas		Creative business opportunities	Noted.
431	Mrs Janet Charlesworth		In point 9.16 you refer to the business area in Highams Park as BEA2. It should be BEA13.	Noted. We will correct this for the next iteration of the Local Plan.
511	Ms Angela Rouse		I support the provision of low cost and affordable workspace to meet the needs of creative, digital and cultural industries, However, it is important to diversify the offering as many of the existing provisions appear underutilised, such as the one in Central Parade, where the office space seems largely unused whilst the cafe space and shops are well used. Such a diversification would be in line with the draft plan as it is stated several times. Specifically, food and drink businesses are not enabled enough in the borough and this is a missed opportunity. There is the opportunity for food to contribute as many as 25,000 further new jobs a year and contribute an additional £500m to the economy in London (Source: NESTA) so let's create a plan that will enable Waltham Forest to attract some of that inward into the borough.	<p>We note your support of Policy 42 Creative Enterprise Zone Part C.</p> <p>The Council recognises the importance food and drink businesses play and the way in which they contribute to the borough's local economy, as well as to the vitality and vibrancy of Waltham Forest town centres and high streets. They will continue to be supported in the borough's town centre locations and in accordance with Policy 53, Evening and Night-time Economy Uses.</p>

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548	Claire Weiss		Care should be taken to ensure that existing employment sites are not converted to residential because of inconsistencies in the planning framework, or errors - such as happened with the 97 Lea Bridge Road site where art deco buildings were lost to the borough even though residents mounted campaigns and exhibitions about this.	This comment is noted for clarification of this section.
767	Aviva Life and Pensions UK		BEAs suitable for co-location/non-employment uses under Paragraph 9.16 should be amended to include BEA16 - Cabinet Way, since its exclusion is not justified by the evidence base and it will significantly weaken the opportunity to realise the objectives of Policy 22 for the North Circular Corridor Strategic Location.	The comment is noted. The Council evidence base sets out that an additional 52,000 sqm is required to be delivered over the plan period. Therefore, all employment sites are being reviewed to see how they could support delivering this employment need.
772	Cllr Alan Siggers		Employment - Have there been discussions with neighbouring authorities regarding employment issues and travel to work patterns across the functional economic area and have any reports been prepared?	Under the 2011 Localism Act and the National Planning Policy Framework (NPPF), local planning authorities have a legal duty to cooperate with other local planning authorities and organisations to seek to address strategic planning matters that are driven by larger than local issues that are likely to have an impact beyond their immediate Local Plan area. In accordance with this, Waltham Forest Council has engaged, and will continue to engage, with neighbouring local authorities to discuss any employment issues raised in their formal representations to the draft Local Plan. A review of the travel-to-work patterns across the borough was carried out as part of the Employment Land Study (2019) to understand where the bulk of Waltham Forest residents work and overall community patterns. The findings can be found in the Employment Land Study (2019).
891	Lauren Keeling	Planning Officer, Essex County Council	ECC notes that reference is made to NPPF Paragraph 182 - The 'Agent of Change' principle which is recognised through Paragraph 9.18 of the Draft Local Plan. The provisions of Policy S39 - Managing Change in Designated Employment Areas	This comment is noted in preparing the new Proposed Submission Local Plan.

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			(clause E) are welcomed and are considered to appropriately transpose the Agent of Change principle into local policy.	
989	The City of London	The Conservator's of Epping Forest	The narrative at 9.10 (p87) which argues that scale, noise, odours, dusts, emissions and hours of operation associated with industrial, manufacturing and logistical uses 'sit less comfortably' with sensitive uses such as housing. The City Corporation would take the view that the location of Strategic Industrial Locations (SIL) and BEA sites close to the Forest would also sit equally uncomfortably given the potential impact on the immediate environmental quality of the forest.	It is noted that the borough's Industrial and Employment sites also sit 'less comfortably' alongside the Forest and appropriate design mitigations and measures will be implemented in accordance with the Agent of Change Principle.
1186	Mrs Jean Turpin		There is also scope for a mix of housing and business use in the business zone off Larkshall Road behind Tesco - development here would not substantially change the character of the area. The space currently occupied by Julies Car Wash and the Chevrolet Centre adjacent to St Anne's Church, E4 6NP.	This comment is noted in preparing the new Proposed Submission Local Plan.
1544	Mark Furnish	Sport England	Traditional forms of employment have been changing in the last 100 years, unfortunately the perception of what employment land is, has not. The introduction of B8 distribution challenged local Authorities in the 80's and '90s as more of these uses came forward. Sport is often overlooked as an employer. It is Sport England's contention that the Draft Local Plan should consider D2 sports uses¼ fitness clubs, gyms, climbing centres and five aside centres, to be acceptable on employment sites and not just focus on B1 space as sports uses do create sustainable employment opportunities and provide work experience and qualifications. When sports facilities are designed in as part of an employment area e.g. Wolverhampton Business Park or Harwell Science Park, it creates a better and more sustainable working environment and therefore an attractive area for business to locate in or relocate to. Furthermore, it should not be overlooked that there are usually	The Council notes Sports England's response to the draft Local Plan to consider accepting D2 uses in the borough's employment sites. In compliance with draft London Plan Policies E4 to E7, is required to protect or intensify the borough's existing employment land for industrial and employment uses. Policy 39, part H will support D2 uses as part of a co-located development as part of an industrial or employment led development to avoid to loss of existing employment floorspaces, as well as the industrial and employment nature of the borough's employment sites. The Council recognises the importance of D2 sports uses for health and well-being in the borough, its contribution to the Waltham Forest economy, and the vitality and vibrancy it brings to the borough's town centres. As such, the Council will support the provision of new indoor and outdoor D2 sport uses within

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			more employment opportunities generated through a commercial gym, e.g. David Lloyd Gyms, or commercial football, e.g. Football First, or a gymnastics club (D2 uses), than a 500,000m ² B8 use. Although Policy 40 does advocate D2 uses in employment areas this is only in very specific circumstances therefore Sport England considers that D2 uses should be considered at all sites in Policies 38, 40 and 41 and without requiring proposals to meet many criteria.	appropriate locations such as the borough's designated town centres, playing pitches or open-space locations.
1545	Mark Furnish	Sport England	The above aside, Sport England does welcome that Policy 45 supports D2 uses in railway arches as these areas could provide useful, and potentially innovative, spaces for sport and physical activity in built up areas.	Support noted.
1620	Bob Bennet		The projected increase of employment within the borough is welcomed, but it is unclear as to how and where the required minimum of 46,000 sq. metres of floor space required by 2035 will actually be located. Bearing in mind the amount of employment land that has, and will continue, to be lost to residential development it is unclear as how this target will be met in practice.	The comment is noted in preparing the new Proposed Submission Local Plan. The Council has commissioned an Employment Land Audit, which will set out how and where employment land can be intensified. In addition, Waltham Forest Council will be preparing SPD masterplans and additional guidance on industrial intensification.
1799	Deborah Taylor		As a local resident of nearly 30 years, I share many of the concerns expressed in the letter. It is impossible to escape the feeling that the council is intending to shoehorn a huge number of dwellings into Highams Park without due regard to local sentiment and with as little public consultation as possible. An additional 450 homes within half a mile of Highams Park station is far too many. Development on this scale would irreparably damage the character of the area, to a say nothing of the pressure on local schools, GP surgeries and the roads which are already heavily congested at peak times.	Noted for consideration.
1903	Mike Chrimes		At start it would be helpful to outline the current state of the local economy, its value within the London economy and employment rates by age sex and if practical ethnicity/regional	Noted for consideration.

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			background, and what the desired rates are and anticipated growth without intervention. A graph showing what has happened since 2000 would be good. Are we better now than in 2008?	
1906	Mike Chrimes		What is the basis for the figure? How much employment does it offer? What is current occupancy rate ie how much new build or change of use is required? Map would be helpful to indicate where the types of space might be offered. Industrious or industrial. What does busy mean - traffic, people, or within office?	Noted. Clarity on these points will be considered.
1907	Mike Chrimes		Key figures 80% employment - is this target or current situation? How does current rate compare with rest of London? What are the 20% doing?	The diagram on page 84 of the draft Local Plan represents the key employment statistical figures for the borough. Recent statistics from 2018 have identified Waltham Forest's employment rate to be at its all-time highest. 80% of working-age Waltham Forest residents are currently in employment; this is currently higher than both the London and national average of 75%.
1908	Mike Chrimes		According to LBWF Stats 93% of businesses employ less than ten people, 73.1 % of local residents are in employment and unemployment rate is 6.1%. It would be useful to standardise the statistics.	The comment is noted in preparing the Proposed Submission Local Plan
1909	Mike Chrimes		What proportion of working population commute out of borough (c. 30%?), and does it vary north to south?	Noted for consideration. Around 20% of the borough out-commute from their usual place of residence. There is no breakdown of this to ward level to be able to calculate a north / south variation.
1910	Mike Chrimes		How many employment spaces are the borough aiming for, and diagram of sector growth aimed for.	Based on the analysis of Waltham Forest's economy and wider market trends, Waltham Forest 's Employment Land Review has identified a need for a minimum of 52,000sqm of employment space by 2033 to support the borough's growing employment floorspace need.

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1911	Mike Chrimes		Loss of floorspace, provide by sector if possible.	Waltham Forest Employment Land Study (2019) has identified the loss of 42.0ha of employment floorspace in the borough to residential uses.
1962	Sandra Sweeney		Building a resilient and creative economy I like this objective. I am concerned we are a low-earning borough and about the employment gap between the white and ethnic minority groups. I hope we avoid improving the borough at the expense of the existing vulnerable residents, like what happened with canary wharf. I would like to see practical strategies to support the improvement of job opportunities, upskilling residents, access now skills and training. I would like to see strategies which link early learning, education, youth services, rehabilitation (health & crime), to support this objective. I believe this objective had the opportunity to future proof this borough's economy, by encouraging and developing local entrepreneurialism. I hope this makes sense. I may have more comments when the plan contains further detail.	Noted. Support welcome. The Council recognises that Waltham Forest is a low-income borough and has a substantial employment gap between white and ethnic-minority groups. One of the borough's key priorities is to ensure all Waltham Forest residents have access to skills, training and employment opportunities.
2302	Mike Chrimes		Retail/food/social infrastructure all include employment.	This comment is noted.
2304	Mike Chrimes		No real indication of what might have greatest beneficial impact on diversifying the economy e.g. theatre, cinema, music studios etc etc	The comment is noted. The creative and cultural industries are identified as a key sector in Waltham Forest Council's Economic Growth Strategy (2016). The Council is considering how it can support this sector and is working on a Cultural Infrastructure Study to support its strategy, in addition to working with the GLA to gain self-accredited Creative Enterprise Zone status and part of this work includes working with creative businesses in the Blackhorse Area to understand how we can support them to keep, seed and grow their businesses in the borough.
2336	The Arch Company		Chapter 9 (Building a Resilient and Creative Economy) The Draft Local Plan successfully recognises that future economic growth within the borough can only be achieved if the right floorspace	The support for policy is noted.

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			and uses are provided in the right locations to ensure that suitable employment opportunities are delivered which meet the needs of the 21st century. The Arch Company agrees with the Council that whilst the capacity of existing employment sites needs to be protected/re-provided (where necessary), but that this should not prevent the intensification of available and deliverable sites which should make the most effective use of land by optimising and/or meeting their development potential, as set out and in line with Chapter 11 of the National Planning Policy Framework (NPPF 2019).	
2541	William Austin		Studiomakers is an initiative of Outset Contemporary Art Fund. We are an advocate for the affordable workspace sector, specialising in the brokering of agreements between developers, councils and affordable workspace operators.	This comment is noted.
2546	William Austin		3. 9.27 points to the use of Section 106 agreements resulting from planning applications for redevelopment. In our experience these have been the most effective tool in delivering affordable workspace.	This comment is noted.
2547	William Austin		Affordability, in reality a discount from market rent, is provided in the form of a subsidy, and we feel it is the responsibility of the developer to bare that cost. With a decade of experience we here at Studiometers are using our specific knowledge base to pioneer a detailed Section 106 model that has successfully secured long-term, truly affordable workspace for London's creative and cultural industries. We would be very willing to talk with Waltham Forest (as we have done for other boroughs) about our model, and advise on developing further guidance documentation resulting from this Local Plan.	This is comment is noted. The Council is happy to engage with Studiometers to discuss their S106 model and how to successfully secure long-term affordable workspace for creative and cultural industries

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Policy 37: Supporting economic growth and jobs				
ID	Full Name	Organisation	Comment	Council (Officers) Response
768	Aviva Life and Pensions UK		A further change sought by these recommendations is in regard to Part B of Policy 38. Part B sets a number of criteria under which development in both SIL and BEAs will be supported. B(iii) states: "Leads to greater intensification to increase floorspace through the provision of new multi-storey units, the sub-division of larger units and where appropriate new smaller units." However, not all these approaches will automatically or necessarily 'lead to greater intensification to increase floorspace'. In terms of soundness, this policy wording is not effective. Part A of draft Policy E7 in the draft new London Plan refers to other measures which generally lead to "more efficient use of land through higher plot ratios". To address this, amended wording for B(iii) should state the following (new wording underlined): "Leads to greater intensification to increase floorspace, for example through the provision of new multi-storey units, the sub-division of larger units, where appropriate new smaller units and other measures which lead to the more efficient use of land through higher plot ratios."	The comment is noted. The Council has commissioned an Employment Land Audit, which will assess how industrial intensification can be achieved in the Borough. The policy will also be updated to ensure general conformity with the London Plan policy E7.
1245	Rosie Sterry	Transport for London - Commercial Development	TfL CD supports the borough's aim to increase employment floor space in the borough and we may aim to deliver commercial development where this is appropriate	Support noted
1246	Rosie Sterry	Transport for London - Commercial Development	This policy should reference the potential to co-locate employment and residential uses in line with DLP policy E7.	The comment is noted. The policy will be updated to be in general conformity with the London Plan Policy E7. In line with Policy E7, Waltham Forest Council has commissioned an Employment Land Audit and industrial masterplans to understand where SIL, LSIS or BEA land uses could be intensified to provide additional capacity or possible facilitate consolidation to support the delivery of other uses, including residential.
1247	Rosie Sterry	Transport for London -	Co-location would allow the borough to protect existing employment floor space, whilst also contributing towards meeting identified housing need through on-site residential	The comment is noted. The policy will be updated to be in general conformity with the London Plan Policy E7. In line with Policy E7, Waltham Forest Council has commissioned an

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Policy 37: Supporting economic growth and jobs				
ID	Full Name	Organisation	Comment	Council (Officers) Response
		Commercial Development	development, promoting a creative and effective use of available land. In particular, development on TfL landholdings (or where TfL have an interest in a site) there may be potential to co-locate residential led development and public transport infrastructure.	Employment Land Audit and industrial masterplans to understand where SIL, LSIS or BEA land uses could be intensified to provide additional capacity or possible facilitate consolidation to support the delivery of other uses, including residential.
1339	Jennefer Peters	Senior Strategic Planner, London Plan Team Greater London Authority	Since the adoption of the Blackhorse Lane Area Action Plan (AAP) in 2015 and the Upper Lea Valley OAPF new evidence produced for the draft new London Plan illustrates that between 2001 and 2015 more than 1,300 ha of industrial land was released to other uses across the capital; well in excess of established monitoring benchmarks. This high rate of loss of industrial land coupled with new demand driven by a strong logistics sector to service London's economic growth means that there is now a net positive demand for industrial land across the capital. The Industrial Land Demand Study conducted on behalf of the GLA in 2017 establishes WF as a retain industrial capacity borough as set out in Table 6.2 of the draft new London Plan and the much stronger approach to the protection of London's industrial land should also be reflected in the draft Local Plan.	The Council has a Business Growth, Investment and Employment team that can assist in engaging with affordable workspace providers as well as, provide further support for business in need of affordable and low-cost workspace in the borough. In addition, Waltham Forest Council has commissioned an Employment Land Audit to understand how it can intensify employment land to deliver a net additional 52,000sqm of employment floorspace, as identified in the Employment Land Study.
1350	Jennefer Peters	Senior Strategic Planner, London Plan Team Greater London Authority	It is particularly welcome that the draft Local Plan recognises the important role of industrial uses for Waltham Forest's economy, as well as the importance for London as a whole of retaining industrial floorspace capacity in the borough, in accordance with the draft new London Plan. GLA officers are keen to work closely with LBWF to fully understand the borough's strategic approach to managing industrial capacity and to help identify opportunities for innovative industrial schemes.	This comment is acknowledged. The Council will continue to engage and work closely with the GLA to fully understand and ensure the new Local Plan is in general conformity with the London Plan. The Council has commissioned an Employment Land Audit to identify opportunities to intensify employment land to deliver a net additional 52,000sqm of employment floorspace, as identified in the Employment Land Study.
1351	Jennefer Peters	Senior Strategic Planner, London Plan	The draft Local Plan identifies a requirement for 43,000m ² of employment space over the plan period, but it is unclear whether the figure refers to industrial or office-based employment floorspace and how it has been derived. The	This comment is noted in preparing the new Proposed Submission Local Plan to ensure all need identified in the Employment Land Study is clearly identified by use class.

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Policy 37: Supporting economic growth and jobs				
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		Team Greater London Authority	London Industrial Land Demand Study (2017) establishes WF as a 'retain capacity' borough for industrial land and identifies a need for approximately 6.2ha and the London Office Policy Review 2017 establishes a need of between 20,200m ² and 58,300m ² of office space up until 2041, depending on a range of factors including the rate of economic growth.	
1376	Blackrock and NEAT Development		No - Whilst we are generally supportive of the proposed employment floorspace target, it is currently unclear where this growth is expected to be located e.g. the Strategic Locations and/or areas of the borough within Opportunity Areas (New London Policy SD1). Further the policy fails to recognise the importance of employment floorspace within Class B1(b) (research and development) as promoted by New London Plan Policies E4 and E8.	The Council has commissioned an Employment Land Audit to further understand how and where it can deliver industrial intensification. In addition, Waltham Forest Council intends to prepare an Industrial Masterplan in line with the London Plan Policy E7. These will set out how employment land will be delivered. Furthermore, the Council intends to prepare masterplans which will provide additional detail of where employment floorspace will be located within the borough. The Council recognises the importance of B1b (Research and Development) employment floorspace in the borough and note this comment in preparing the Proposed Submission of the Local Plan.
1382	Blackrock and NEAT Development		Whilst in general conformity with the thrust of NPPF (Chapter 6), the policy should better reflect the need for flexibility and responsiveness to market needs.	This comment is noted in preparing the new Proposed Submission Local Plan.
1383	Blackrock and NEAT Development		The policy should be amended to further define where this employment floorspace growth is expected to be located. Further (part iii) to include Use Class B1(a) and (b) in order to reflect LBWF Employment Land Study's (2019) findings on employment floorspace need and further define the 'New London Mix'.	This comment is noted in preparing the Proposed Submission Local Plan. The policy will be updated to reflect the evidence base.
2067	Stonecrest Marble Ltd	Stonecrest Marble Ltd	Policy 37 of the Draft Local Plan confirms the requirement of the plan to provide a minimum of 46,000sqm of additional employment land during the plan period. We support the Council's intention in this regard and our client is committed to the delivery of a commercial development of his site to	The employment floorspace requirement of 46,000sqm was the figure identified in the first draft of the Employment Land Study (2019). To ensure the accuracy of the Employment Land Study and to ensure the identified floorspace need is in line with the Draft Local Plan period, the Employment Land Study was

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Policy 37: Supporting economic growth and jobs				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			<p>contribute towards meeting this policy requirement, though refer to our earlier comment that the Policy requirement falls below the Employment Land Study 2019 requirement for 52,000sqm. 5.41 Accordingly, the Policy should be revised to reflect the Evidence Base. 5.42 However, the plan is silent on where this additional land will be found, with the plan not allocating specific sites, or releasing suitable sites within the Green Belt (such as my client's site) to meet this need requirement. It is not clear from the wording of Policy 37 what the Strategy for meeting the requirement is, or how effective the policy will be, as it suggests that additional floorspace will be found on existing sites. 5.43 Indeed, it is noted that the 2019 Employment Land Study confirms that, "there are limited opportunities to create additional capacity within the designated employment sites without a strong focus on intensification of the existing floorspace provided". The policy should be updated to reflect the findings of the 2019 Study, as this will aid delivery of the Policy. In addition, and as per our earlier comments, future versions of the Plan should specifically allocate sites for employment development in order to provide a strategic framework for the delivery of the 52,000sqm of employment land required during the plan period.</p>	<p>finalised and published online during the Draft Local Plan consultation period with the updated employment floorspace figure of 52,000sqm. The Proposed Submission Local Plan will be updated to reflect the updated employment floorspace figure. The Council is aware of the need to allocate specific sites and land in the borough for employment land. The Council intends to prepare Masterplan SPDs to guide and co-ordinate development. This will provide greater detail of where employment floorspace will be located within the borough. The Council is also working in close partnership with the GLA to further establish the direction of growth for the borough's employment land.</p>
2509	Miss Victoria Manston	Berkeley Homes North East London	<p>We support the Council's approach to improve and increase the provision of jobs within the borough.</p>	<p>Support noted.</p>
2510	Miss Victoria Manston	Berkeley Homes North East London	<p>We agree that developments should provide a variety of employment space. We strongly believe that the provision of employment floorspace within redevelopment schemes should be based on a holistic approach that does not just rely on a quantitative re-provision of gross internal floor area from previous buildings but rather assesses the type and density of the employment use to be provided. It should also consider</p>	<p>The comment is noted. The Council has commissioned an Employment Land Audit which will assess how industrial intensification can be achieved in the borough. The policy will also be updated to ensure general conformity with the London Plan policy E7. In addition, the Council intends to prepare an Industrial Masterplan in line with the London Plan Policy E7.</p>

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Policy 37: Supporting economic growth and jobs				
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			how these meet local demand for new flexible employment opportunities and how they can increase the number of jobs.	

Policy 38: Safeguarding Employment Land				
ID	Full Name	Organisation	Comment	Council (Officers) Response
1348	Claire Laurence	London Borough of Newham	LBN support the protection of employment land (notably SIL) including the promotion of B2 and B8 (including warehousing, logistics and distribution for this PMA) recognising the increasing sub-regional pressures on employment land, which are recognised both nationally and strategically across London as informed by the London Industrial Land Demand Study (2017).	Support noted
1359	Jennefer Peters	Senior Strategic Planner, London Plan Team Greater London Authority	Policy 38 A ii would allow office and workspace (B1a) development in BEAs. This approach would not comply with Policy E6 of the draft new London Plan, which requires boroughs to make clear the range of industrial and related uses that are acceptable in LSIS and distinguish these from local employment areas that can accommodate a wider range of business uses. Any BEAs that have scope for office uses should be identified and the implications of this for planning to retain industrial capacity in Waltham Forest should be addressed.	The comment is noted. The Council is considering which employment sites could potential be changed from BEA to LSIS as part of its recently commissioned Employment Land Audit.
1384	Blackrock and NEAT Development		No - the policy (part a) is not consistent with New London Plan Policies E4 and E5 in terms of appropriate employment uses for new development within SIL. Further 'Ancillary uses to the above' should be clearly defined. We consider part B9(i) should align with Policy E4 and the New London Plan's general aim of ensuring a no-net-loss of industrial floorspace capacity across London.	Noted. The policy will be updated to reflect London Plan Policy E4 A 1-10 and will clearly define ancillary uses.

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Policy 38: Safeguarding Employment Land				
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1385	Blackrock and NEAT Development		We are supportive of the Policy's focus on ensuring efficient use of employment floorspace, promoting multi-storey units. However, we wish to understand on what basis part B (vi) in terms of requiring a fit out beyond shell and core is justified and controllable under the planning system. We consider that this could limit the flexibility of new units in responding to changing market signals.	Policy 38 Safeguarding Employment Land Part B will ensure the provision of high-quality units for employment uses that is flexible and adaptable in response to future employment floorspace needs and the changing market. This comment is noted in preparing the new Proposed Submission Local Plan to strengthen the justification and direction in which this can be managed through the planning system.
1386	Blackrock and NEAT Development		The policy (part A(i)) should be amended to confirm in line with Part A of New London Plan Policy E4 e.g. Use Class B1(b), 'emerging industrial related sectors' and flexible B1/B2/B8 hybrid space. In addition to confirmation of acceptable ancillary uses e.g. B1(a), A1 and A3/4 uses, particularly associated with creative/cultural industries (studio/workshop/coworking spaces). It is recommended that part B(vi) of the policy is removed.	This comment is noted and will be reviewed in preparing the new Proposed Submission Local Plan.
1578	Mr Matthew Robinson		The ability to co-locate employment and non-employment uses in this location through a comprehensive and masterplanned approach is strongly encouraged, with the land at Rigg Approach and Lammas Road (which is being promoted for intensification by Peabody) deemed suitable for this.	Support noted for the masterplan approach.
1621	Bob Bennet		The increased flexibility for additional uses to be located in designated employment areas is to be welcomed but it is unclear to the justification for the wording of para H as it restricts such uses "to serving the needs the occupier of such development". There are a range of other uses that are difficult to find locations in town centres or residential areas, for which a location in an industrial area might be more suitable. Finally, is it appropriate for 'Class 3C' residential units to be located in designated employment areas.	General support noted. The decision for non-employment uses in the borough's employment to serve the needs of the occupier will ensure the new non-employment uses (other than Residential C3) will not impact, hinder or overtake the employment and industrial function of the borough's employment sites.
2337	The Arch Company		Draft Policies 38 (Safeguarding Employment Land) & 39 (Managing Change in Designated Employment Areas) Following the principles established by Policies E6 and E7 contained in the	Support noted. The Council has commissioned an Employment Land Audit to further understand how and where it can deliver industrial intensification. In addition, this, the Council intends to

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			<p>emerging Draft London Plan, Draft Policies 38 and 39 set out that the Council supports managed change in designated employment sites, such as BEA17, which is specifically identified as being a suitable location for 'co-location': the provision of other uses alongside industrial uses include a mix of retail, commercial and/or community uses as well as new housing (falling within Use Class C3 of The Town and Country Planning (Use Classes) Order 1987 as amended), subject to meeting certain policy tests listed in Draft Policy 39. The Arch Company strongly supports the Council's aspiration to provide mixed use developments within designated employment sites in order to achieve its ambitious growth targets, including the delivery of 27,000 new homes and 46,000 sqm of employment floorspace across the borough. BEA17 as well as other designated employment sites can significantly assist the Council in re-providing and/or enhancing existing employment-generating floorspace whilst making the most efficient use of (brownfield) land "through the co-location of employment with other uses that can operate from multi-storey buildings, alongside or mixed with other non-employment uses where appropriate" (Draft Policy 39). Supporting Paragraph 9.13 states that: "A coordinated masterplan approach is a two-stage process that is developed in collaboration with the Greater London Authority (GLA) and Waltham Forest. The approach seeks to open up opportunities for industrial intensification and co-location to deliver employment led redevelopment and transformation of the borough's existing SIL and BEA where appropriate. As an area specific approach, it should consider the whole designated SIL and BEA and their surrounding context. It should produce a detailed analysis on the site capacity, access and servicing, decant and phasing, deliverability and opportunities for place-making." The Arch Company is looking forward to engaging with</p>	<p>prepare Industrial Masterplan in line with the London Plan Policy E7. Furthermore, the Employment Land Study (2019) provides detailed analysis of all employment sites in the borough including supply and demand, recommendations for future uses and strategies. The Employment Land Study can be viewed via the link below: https://walthamforest.gov.uk/sites/default/files/LBWF%20Employment%20Land%20Study%20Update_%202019.pdf</p>

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			<p>LB Waltham Forest (and GLA) Officers in order to follow this process in relation to the redevelopment of their interests in the borough and support the requirement for an analytic and design-led process to determine the development potential of sites identified for co-location. However, there should be sufficient flexibility to work with the Council, the GLA and other stakeholders to determine the optimum density, quantum of development, level of intensification, mix of uses and a co-location strategy as part of the pre-application process rather than through the adoption of a masterplan which may delay the delivery of new development. This is considered particularly of relevance to BEA17 on the basis that the entire BEA designation sits within the long-term leasehold of The Arch Company. In light of this, it is also important to highlight that the Employment Land Study Final Report (August 2019) by Avison Young (part of the Draft Local Plan Evidence Base) designates BEA17 as a site suitable for 'Intensification and follow on co-location' (page 5). We would comment that due to the single ownership of the site, it offers a unique opportunity to consolidate and/or intensify employment uses as part of a comprehensive redevelopment which also delivers a range of other land uses. This would result in the potential to simplify the masterplanning process whilst accelerating its delivery as opposed to being two distinct (development) phases (i.e. intensify then co-locate).</p>	

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Policy 39: Managing Change in Designated Employment Areas				
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766	Aviva Life and Pensions UK		BEAs suitable for co-location/non-employment uses under Paragraph 9.16 should be amended to include BEA16 - Cabinet Way, since its exclusion is not justified by the evidence base and it will significantly weaken the opportunity to realise the objectives of Policy 22 for the North Circular Corridor Strategic Location.	The Council's evidence from the Employment Land Study 2019 supports the retention of BEA16 (Cabinet Way) for industrial intensification. The objectives of Policy 22 will not be compromised as there are opportunities elsewhere within the North Circular Strategic Location to deliver housing growth.
770	Aviva Life and Pensions UK		Policy 39 - 'Managing Change in Designated Employment Areas' sets requirements for proposals for regeneration of parts or whole areas of designated employment areas, including BEAs. Co-location of other non-employment uses, including residential, is generally allowed subject to meeting the criteria specified in the policy. Text in draft Paragraph 9.16 lists 12 BEA sites as "suitable locations for co-location". Twelve BEAs are listed, but not BEA16 - Cabinet Way. The evidence base for the draft Local Plan includes the Employment Land Study - Final Report (August 2019), prepared by Avison Young for Waltham Forest. Section 3 of the Study presents an analysis of the existing employment land within the borough. BEA16 is part of 'Cluster A - Chingford & Highams Park'. An "Employment Quality Score" is provided for the sites in the Cluster at page 28. The table at page 29 then assumes suitable employment uses for the sites. The table at page 30 sets out recommendations whether the assessed sites are suitable to 'Retain' in current use, 'Intensification' for employment uses or 'Co-location' of employment uses alongside non-employment uses. The comments in the table at page 30 do not assess the suitability of BEA16 for non-employment uses and pre-judge the type of employment uses that might be suitable with very limited site assessment being undertaken. In terms of other policies and allocations in the Plan, Deacon Trading Estate's inclusion within the North Circular Corridor Strategic Location is also very relevant. The policy framework for this area set under Policy 22	The comment is noted. The Council has commissioned an Employment Land Audit which will assess how industrial intensification can be achieved in the borough. The policy will also be updated to ensure general conformity with the London Plan policy E7.

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			is much more forward-looking and recognises the potential that this corridor has. Deacon Trading Estate is one of the largest sites within this corridor - and within single-ownership by Aviva as one of the most significant institutional investors. It can contribute significantly to realising the priorities under the policy, which include: 1. Achievement of minimum growth targets of 900 new homes; 2. Provide opportunities to link to the neighbouring large scale regeneration and infrastructure investment at the adjoining Meridian Water, London Borough of Enfield; 3. Retain existing employment land (both SIL and BEA) to provide a net increase in jobs through intensification, co-location and renewal; 4. Explore the potential for mixed use intensification of retail areas along the corridor; 6. Strengthen the character and identity of the A406 corridor through design improvement measures for better safety, functional and effective connections with local places, activity hubs and communities; 7. Improve public realm and public spaces across the area and walking and cycling accessibility, connectivity, permeability and legibility to Meridian Water.	
814	Freight Transport Association		We strongly welcome adoption of the 'Agent of Change' principle and seek clarity on how the principle will be enforced long term.	The Council recognises the challenges with sensitive developments in non-employment uses. In accordance with the principles of 'Agent of Change' a clear set of the mitigations will be considered for inclusion and reference in the Proposed Submission Local Plan.
822	Freight Transport Association		F & G - FTA is pleased to see that servicing and access is included in the list of design mitigations for regeneration projects. It is important that arrangements for access for freight and servicing in new developments should be incorporated at the earliest stages. This should include consideration for personal deliveries and servicing activities. As more people are encouraged be less reliant on their private car or to live car-	Support noted.

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			free, they will be more dependent on the logistics sector to deliver their goods and services.	
823	Freight Transport Association		<p>We strongly welcome the adoption of the 'Agent of Change' principle as a sensible and pragmatic approach to the issues which all too often arise from new residential developments being constructed next to existing industrial and logistics sites. This has over the years resulted in many businesses being forced to restrict their activities, relocate or close down altogether (with the associated loss of employment). The onus should be on developers to ensure that new residential developments are designed in such a way that existing businesses and the new residents are protected. Clarity is required on how the principle will be enforced in the long-term and safeguards need to be put in place to ensure that it remains enforceable after the developer has sold the property. For example, if the developer doesn't do a good enough job with the mitigation measures and a new resident moves in several years later and complains. It needs to consider the eventuality of the developer no longer being in business. The onus of failed noise and nuisance mitigation should not fall on the existing industrial/logistics site operator. The ten-year New House Builder Guarantee could be used as a method of protection. The proposal also needs to protect future uses of the industrial land, such as if the business wishes to expand or diversify. Further detail is needed regarding the timeframe and test criteria for this protection.</p>	This comment is noted in preparing the new Proposed Submission Local Plan .
824	Freight Transport Association		While vertical stacking may be appropriate for some industrial uses, it is not problematic for logistics operations where open land and vehicle storage areas are required.	This comment is noted in preparing the new Proposed Submission Local Plan

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825	Freight Transport Association		In addition, the Local Plan makes no mention of the need for lorry parking facilities. All drivers of HGVs (goods vehicles over 3.5 tonnes) must, under EU Drivers Hours regulations, take rest breaks during the day (45 minutes after 4.5 hours of driving) as well as overnight and weekly rest breaks. In May 2018, the Department for Transport published the National Survey of Lorry Parking, which identified that there is a severe lack of facilities for drivers to take their breaks in the Greater South East region. Whilst London does have some facilities, none of them have any level of security fencing and they are the most expensive in the UK so offer extremely poor value for money. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/723349/national-survey-of-lorry-parking-report.pdf	This comment is noted in preparing the new Proposed Submission Local Plan.
1354	Jennefer Peters	Senior Strategic Planner, London Plan Team Greater London Authority	In order to retain industrial capacity in the borough, WF should note that the co-location of industrial and non-industrial uses is only considered acceptable in LSIS (in certain circumstances) and non-designated industrial sites as set out in Policy E7 of the draft new London Plan but is not acceptable within SIL. Paragraph 9.15 and Policies 7 and 39 of WF's draft Local Plan should be amended accordingly.	The comment is noted. The Council has commissioned an Employment Land Audit which will assess how industrial intensification can be achieved in the borough. The policy will also be updated to ensure general conformity with the London Plan policy E7. In addition, Waltham Forest Council intends to prepare an Industrial Masterplan in line with the London Plan Policy E7.
1356	Jennefer Peters	Senior Strategic Planner, London Plan Team Greater London Authority	Areas of SIL may, in appropriate circumstances, be released from their industrial designation to allow for the introduction of non-industrial uses, but only where this would result, as a minimum, in no net loss of industrial floorspace capacity on the remaining SIL, through a process of intensification and consolidation as part of a plan-led or masterplanned approach in accordance with Policy E7 of the draft new London Plan. The identification of suitable sites for co-location and intensification should be underpinned by evidence in line with the Mayor's published Practice Note on Industrial intensification and co-location through plan-led and masterplan approaches	The comment is noted. The Council has commissioned an Employment Land Audit which will assess how industrial intensification can be achieved in the borough. The policy will also be updated to ensure general conformity with the London Plan policy E7. In addition, Waltham Forest Council intends to prepare an Industrial Masterplan in line with the London Plan Policy E7.

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			(November 2018) with special regard to the guidelines set out in part 3 of that note.	
1357	Jennefer Peters	Senior Strategic Planner, London Plan Team Greater London Authority	The identification of specific industrial areas where significant change is expected to come forward (paras 9.15 and 9.16) is welcome. It may be more appropriate in some BEAs (LSIS) to take an approach of intensification and consolidation, rather than co-location. It would also be useful to understand existing industrial capacity in these locations, based on a floorspace figure and considering yard requirements, in order to explore how intensification would re-provide this capacity. GLA officers would welcome further discussion on this.	The comment is noted. The Council has commissioned an Employment Land Audit which will assess how industrial intensification can be achieved in the borough, including setting out specific industrial areas where significant change is expected to come forward. The policy will also be updated to ensure general conformity with the London Plan policy E7. In addition, Waltham Forest Council intends to prepare Industrial Masterplan in line with the London Plan Policy E7.
1360	Jennefer Peters	Senior Strategic Planner, London Plan Team Greater London Authority	In draft Policy 40, and elsewhere in the draft Local Plan, there is an opportunity to provide a clearer distinction between industrial (and related) uses and wider employment uses. As drafted, Policy 40 could be interpreted to apply to areas that are industrial but also other employment uses, particularly offices. As drafted, the policy could also result in the erosion of industrial (and related) uses by office development, and would not fully align with the approach in policy E7 of the draft London Plan. Part C of the policy could also result in further erosion of industrial uses due to amenity concerns for neighbouring occupiers.	This comment is noted and a clearer distinction between industrial and wider employment uses will be taken into consideration in preparing the new Proposed Submission Local Plan.
1388	Blackrock and NEAT Development		We wish to confirm our strong support for this policy, particularly the Council's proactive focus on intensifying employment uses whilst also promoting the colocation of nonemployment uses including residential.	Support noted.
1389	Blackrock and NEAT Development		We offer firm support to Paragraph 9.15 and the supporting table confirming Blackhorse Lane SIL's suitability for co-location.	Support noted.

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1391	Blackrock and NEAT Development		We consider the approach broadly aligns with the New London Plan (Policies E5 and E7), However, it is recommended the Policy (part D) is amended to reflect the latest amendments of Policy E7 with Part E and H also amended to include reference to B1(a) and (b) uses.	This comment is noted and will be reviewed in preparing the new Proposed Submission Local Plan.
1393	Blackrock and NEAT Development		Part D should be amended to remove the requirement for the employment phase to be operational ahead of any residential component being occupied. It should instead only require that it is completed to ensure consistency with New London Plan Policy E7.	This comment is noted in preparing the Proposed Submission Local Plan and will be reviewed in light of the changes to the London Plan.
1394	Blackrock and NEAT Development		Parts E and H of the Policy should be amended to ensure Class B1(a) and (b) uses can be included as appropriate. This will assist in supporting the Council's ambitions to 'keep, seed and grow' key industries including the creative / cultural sector.	Noted. We will review this and include any updates in the next iteration of the Local Plan.
1622	Bob Bennet		The increased flexibility for additional uses to be located in designated employment areas is to be welcomed but it is unclear to the justification for the wording of para H as it restricts such uses "to serving the needs the occupier of such development". There are a range of other uses that are difficult to find locations in town centres or residential areas, for which a location in an industrial area might be more suitable. Finally, is it appropriate for 'Class 3C' residential units to be located in designated employment areas.	General support noted. The decision for non-employment uses in the borough's employment to serve the needs of the occupier will ensure the new non-employment uses (other than Residential C3) will not impact, hinder or overtake the employment and industrial function of the borough's employment sites.
1633	Oliver Milne	Savills (UK) Ltd	However, we note that each of the destinations have been reviewed as a whole and consideration hasn't been given to specific sites within each designation. The significance of this is that, in the context of the Sutherland Road BEA, the Study doesn't consider the recent residential-led, mixed-use developments at the Unity Works site, the Headbourne House site or the Atelier Place site; it doesn't consider the extant planning permission at the Cordage Works site; and it doesn't consider the pending planning permission at the Former Webbs	This comment is noted and the Employment Land Study will be reviewed in preparing the Proposed Submission Local Plan. Response 2: This comment is noted and the Employment Land Study will be reviewed in preparing the Proposed Submission Local Plan

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			Industrial Estate site. With regards to the Cordage Works site and the Former Webbs Industrial Estate site, works associated with the respective planning permissions are due to start later this year. By the time the Council prepares and published a Regulation 19 version of the new Local Plan, these sites will be committed to residential-led, mixed-used developments. The recent and emerging developments within the BEA cover a significant proportion of the BEA which will ultimately effect the function and aspiration of the BEA in the future. We therefore think that the evidence base is incomplete and provides inadequate information to robustly inform the spatial strategy for the borough.	
1778	Wanis Ltd	Wanis Ltd	Part D of the policy is overly prescriptive in requiring employment uses to completed and operational prior to first occupation of non-employment uses, and fails to take account of the inherent viability challenges associated with delivering new high quality employment uses alongside high quality residential. On complex mixed use (co-located) schemes, it can often be the non-employment uses that are the value generators that make comprehensive redevelopment viable. The policy needs to be amended to allow a degree of flexibility on the phasing of development to take account of viability challenges.	The comment is noted. The Council has commissioned an Employment Land Audit, which will assess how industrial intensification can be achieved in the Borough and will considered viability challenges associated with co-location. The policy will also be updated to ensure general conformity with the London Plan policies E7, H3 and H4.
1779	Wanis Ltd	Wanis Ltd	It is requested that the policy be worded as follows: D. The phasing of the proposed development secures the completion and operation of the employment components of the scheme before first occupation of remaining non-employment uses; unless alternative phasing can be justified based on scheme viability and site and design constraints.	This comment is noted.
1780	Wanis Ltd	Wanis Ltd	Paragraph 9.15: Wanis requests that the Lea Bridge SIL be added to the table at Paragraph 9.15.	The comment is noted. The Council has commissioned an Employment Land Audit, which will assess how industrial intensification can be achieved in the borough, including setting

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				out specific industrial areas where significant change is expected to come forward. The policy will also be updated to ensure general conformity with the London Plan Policy E7. In addition, Waltham Forest Council intends to prepare Industrial Masterplan for the Lea Bridge SIL in line with the London Plan Policy E7 to consider how industrial intensification could be achieved and whether additional uses could be delivered on site.
1781	Wanis Ltd	Wanis Ltd	The draft Local Plan through policies 4,5,6 and 7 promotes co-location of employment and non-employment uses on SIL sites in strategic locations, and those accessible locations well served by public transport. The Lea Bridge SIL satisfies all these requirements and furthermore Policy 7 (3) specifically identifies Lea Bridge SIL for co-location.	This comment is noted.
1826	The Delta Group	The Delta Group	When examining plans, the NPPF (2019) sets out the tests which need to be considered when assessing whether a Plan is 'sound'. The tests under Paragraph 35 of the NPPF are as follows: Positively prepared; Justified; Effective; and Consistent with national policy. When taking into account these tests, we in particular consider that Parts A and B of draft Policy 39 do not meet the 'justified' or 'effective test' and these parts of the Draft Plan are therefore unsound.	This comment is noted in preparing the Proposed Submission Local Plan.
1827	The Delta Group	The Delta Group	Under the draft New London Plan, Paragraph 6.72 sets out that whilst there may be scope for parts of SILs to be consolidated and allow for the facilitation of land to be released for a mix of uses including residential, Local Plan maps and/or masterplans should indicate clearly: The area to be retained and intensified as SIL; and The area to be released from SIL. From a review of the draft Local Plan, the Council have not yet undertaken this approach and instead have simply made reference in draft Policy 39 that co-location is acceptable. It is not clear at this stage whether the Council's objective for co-location relates to	The Council notes the need to set out the Council's approach for the retention, intensification and release of employment land. The Council intends to prepare Masterplan SPDs to guide and co-ordinate development. This will provide greater detail of where employment floorspace will be located within the borough. The Council is also working in close partnership with the GLA to further establish the direction of growth for the Boroughs employment land.

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			the whole SIL designation or just part. Furthermore, without the development of a co-ordinated masterplan at this stage, there is no evidence of how the Local Planning Authority will achieve co-location, whilst seeking to also propose an intensification of industrial capacity and deliver 1,650 new homes as set out in draft Policy 15 mentioned above.	
1829	The Delta Group	The Delta Group	For the LPA to develop the plan so that it is 'sound', in terms of emerging Policy 39, we recommend that the LPA should prepare a masterplan immediately in conjunction with the emerging Local Plan. By undertaking this approach, we are of the opinion that the draft Policy meet the NPPF soundness tests of 'justified' and 'effective'. Developing a masterplan now would provide the Council with an appropriate level of certainty that the amount of commercial and residential development envisaged under draft Policy 15 can be accommodated thereby rendering the policy justified and effective. This would also provide land owners with greater certainty concerning the development potential of land within the Blackhorse Lane SIL which will speed up development and ensure the policy is effective.	The comment is noted. The Council has commissioned an Employment Land Audit, which will assess how industrial intensification can be achieved in the borough, including setting out specific industrial areas where significant change is expected to come forward. The policy will also be updated to ensure general conformity with the London Plan Policy E7. In addition, the Council intends to prepare Industrial Masterplan in line with the London Plan Policy E7.
1830	The Delta Group	The Delta Group	However, in our opinion the draft plan as currently drafted is unsound as the policies, in particular policies 15 and 39, are not justified nor effective and are not in accordance with the approach set out for SIL release / co- location in the draft London Plan. Until a masterplan is developed in conjunction with the emerging Local Plan, we consider that emerging Policy 39 is 'unsound' based on the tests set out in the NPPF. The development of masterplan for Blackhorse Lane SIL, will ensure the plan is justified and effective.	This comment is noted. The Council intends to prepare Masterplan SPDs to guide and co-ordinate development. This will provide greater detail of where employment floorspace will be located within the borough. The Council is also working in close partnership with the GLA to further establish the direction of growth for the borough's employment land.
1913	Mike Chrimes		Map would be useful, the options look like a scissors and paste job without knowledge of the locations, surely renewal is generally applicable. I don't see how you can retain and	This point is noted. The reference in the Employment Land Study to the SIL Former Town Gas Work Site refers to a site also known as Orient Way, which is allocated as a Strategic

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Policy 39: Managing Change in Designated Employment Areas				
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			intensify and the gasworks site. I assume this has been decontaminated. Table 7.2 needs a map and there is no sense to the order. Neither table indicates existing employment numbers or intended numbers.	Industrial Location in the Lea Bridge Gateway area. The proposed approach to this site will be reviewed to ensure general conformity with London Plan Policy E7. The Gas Holder site behind, backing on to Leyton Jubilee Park, is not allocated as employment land. The Council is preparing a Site Allocations Development Plan Document and this will set out any site-specific allocations for sites. This new document will provide opportunity to apply the policies of the plan on specific sites, providing more details on how new developments could be integrated within existing local areas. It is proposed to provide additional information, including maps for better referencing, clarity and interpretation to guide plan readers.
1914	Mike Chrimes		F doesn't make sense - occupation of residential or non-residential.	Noted.
2266		St William Homes LLP	The principle St William site is not allocated within Strategic Industrial Land or Borough Employment Area. Former gasholder sites do not fall within a Class B use. They are sui generis uses.	There are no site allocations in the Local Plan. We will be consulting on a Site Allocations document alongside the Local Plan in 2020.
2584	Mr Peter Carey	London Borough of Waltham Forest	The 'Agent of Change' principle covered in Paragraph 9.18 of the draft Local Plan is a cause of concern for the Environmental Protection Team. The team is currently dealing with complaints at several locations where new housing development is conflict with existing industrial/commercial land uses. Although developers are supposed to plan and implement developments to avoid new development being affected by existing uses, there remains a significant possibility that disturbance could result in complaints and the Environmental Protection Team having to instigate formal action to deal with statutory nuisance. It will require very careful consideration of the wider environment where a development is proposed to ensure that such problems are avoided.	This point is noted for consideration and discussion with Waltham Forest Council's Environmental Protection Team.

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Policy 39: Managing Change in Designated Employment Areas				
ID	Full Name	Organisation	Comment	Council (Officers) Response
2691	Mr Peter Carey	Service Manager Air Quality & Environmental Protection London Borough of Waltham Forest	The 'Agent of Change' principle covered in Paragraph 9.18 of the draft Local Plan is a cause of concern for the Environmental Protection Team. The team is currently dealing with complaints at several locations where new housing development is conflict with existing industrial/commercial land uses. Although developers are supposed to plan and implement developments to avoid new development being affected by existing uses, there remains a significant possibility that disturbance could result in complaints and the Environmental Protection Team having to instigate formal action to deal with statutory nuisance. It will require very careful consideration of the wider environment where a development is proposed to ensure that such problems are avoided. At a national and London level, there are clear policy positions regarding noise control, including the following: The Government's Noise Policy Statement for England provides a national policy basis for addressing noise. The Mayor's draft London Plan has a specific policy on noise - D13 The Mayor's London Environment Strategy includes a specific chapter on ambient noise. In conclusion, although I accept that the issue of noise is addressed in the draft Local Plan, I think that there is an opportunity to provide more emphasis of the subject and seeking to control and address the adverse impacts of noise for the benefit of all communities in the borough.	Noted. We will consider this point and publish any changes necessary in the next publication of the Local Plan.

Policy 40: Approach to Non-Designated Employment Land				
ID	Full Name	Organisation	Comment	Council (Officers) Response
1256	Rosie Sterry	Transport for London - Commercial Development	The second part of this policy refers to Policy E7 of the DLP which concerns Use Class B sites. Whilst the supporting text at Paragraph 9.21 does refer to Use Class B sites, this should be made clear in the policy as well.	This comment is noted and greater clarification of the use classes suitable in the Waltham Forest's Non-Designated Employment Land will be addressed.

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Policy 40: Approach to Non-Designated Employment Land				
ID	Full Name	Organisation	Comment	Council (Officers) Response
1257	Rosie Sterry	Transport for London - Commercial Development	It is considered that the second part of the policy is not in line with Policy E7 of the DLP. Firstly, the DLP does not directly refer to net loss of non-designated employment land aside from this being permissible subject to evidence that there is no reasonable prospect of the site being used for industrial and related purposes.	This comment is noted and Policy 41 Approach to Non-Designated Employment land will be reviewed in consideration of the Draft London Plan policy E7 Industrial Intensification, Co-location and Substitution to ensure compliance with the Draft London Plan.
1258	Rosie Sterry	Transport for London - Commercial Development	Policy 40 should not be worded so the emphasis is on the net loss - this is a negative wording and policies should be worded positively in line with Paragraph 16 of the NPPF, which states that plan should be prepared positively, in a way that is aspirational but deliverable.	This comment is noted and Policy 40 Approach to Non-Designated Employment Land will be revised where necessary.
1259	Rosie Sterry	Transport for London - Commercial Development	In addition, part (b) of the second part of the policy states that the loss of employment floor space will only be permitted where the development provides opportunities for co-location or mixed-use with other non-employment uses. In some cases it may not be viable or appropriate to provide these uses on non-designated employment land and therefore this policy would block development. The wording of the policy should be changed so as to make the provision of co-location or mixed-use with other non-employment uses desirable but not a necessity for development on these sites.	This comment is noted in preparing the new Proposed Submission Local Plan.
1260	Rosie Sterry	Transport for London - Commercial Development	It is considered that the second half of Policy 40 does not add anything in addition to Policy E7 in the DLP and should be deleted, in line with Paragraph 0.0.23 of the DLP which notes that policies should not be duplicated unnecessarily.	This comment is noted in preparing the new Proposed Submission Local Plan.
1261	Rosie Sterry	Transport for London - Commercial Development	If Policy 40 is retained, then part D of Policy E7 in the DLP sets out a series of options (using the word 'or') rather than Policy 40 which seems to be a series of connected requirements (using the word 'and') and it should be clarified whether these criteria are 'or' or 'and'.	This comment is noted in preparing the new Proposed Submission Local Plan.
1358	Jennefer Peters	Senior Strategic Planner,	Non-designated industrial sites make up 36% of London's overall industrial capacity, making a significant contribution to the functioning of London overall. Draft Policy 40 seeks to	The comment is noted. The Council is considering which employment sites could potential be changed from non-

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Policy 40: Approach to Non-Designated Employment Land				
ID	Full Name	Organisation	Comment	Council (Officers) Response
		London Plan Team Greater London Authority	protect and enhance non-designated employment land. Where these are industrial in nature, and nature, and play a significant role in the supply of industrial uses for the borough, the Mayor would encourage the industrial designation (as LSIS) of these and other similar sites, potentially those listed at Paragraph 9.23, where they exhibit characteristics worthy of greater protection in a methodical and consistent manner based on local up-to-date evidence. Such designations can offer a greater level of protection for industrial floorspace capacity while providing the flexibility for the introduction of non-industrial uses through co-location and intensification in appropriate circumstances. Identification of sites as suitable for co-location can be complex and should not be based on performance alone but should instead include considerations such as, for example, access to the wider transport network and the nature of current industrial uses taking place. Paragraph 9.23 of draft Local Plan should be amended accordingly.	designated or BEA to LSIS as part of its recently commissioned Employment Land Audit.
1897	London and Quadrant (L&Q)	Director	Overall, we are generally supportive of the policy, given that it aligns with Policy E7 of the Draft London Plan. However, it is noted that Site Allocation 18 (Crownlea) within the draft Wood Street AAP has for the last 6 years been flagged for residential-led mixed use or residential only development schemes which has obviously informed the development planning for the site over this period and continues to do so. While this is considered entirely appropriate given the location of the site and the housing needs of the borough, Draft Policy 40 (Approach to Non-Designated Employment Land) appears to contradict this development approach by introducing protections and promoting intensification of the industrial uses on the site, which would not be compatible with residential uses. This will be discussed further in comments on Draft Policy 40 below, but is set to create a conflict within the DLP that would have severe implications for the current development planning for the site	Noted. However, the London Plan has stated that the borough is a retain borough. The approach taken will be reviewed to ensure it is in line with the London Plan. The London Plan approach does not mean that residential cannot be delivered but it must meet the tests set out in the London Plan policy.

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Policy 40: Approach to Non-Designated Employment Land				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			<p>and proposals in the pipeline. Notwithstanding this, it is acknowledged in Paragraph 9.23 of the LBWF DLP that the borough's Employment Land Review (2019) has identified that the borough's non-designated employment sites that are low performing, located in residential areas and in close proximity to public transport would be suitable locations for the mixed use co-location of residential and commercial / industrial uses. It is also noted that one of the non-designated employment sites (LBWF9 Skeltons Lane) which is flagged for protection and intensification with co-location is also the same site identified as Site 18 within the Wood Street AAP (Crownlea), which is flagged for residential-led development and has been for the past 6 years in the draft AAP. As such, DLP Policy 40 (error - is 41) appears to contradict this development approach by introducing protections and intensification of the industrial uses on the site, which are acknowledged as underperforming and which would not be compatible with residential uses, compounded by further residential development currently intensifying around the site as well. Development proposals and planning for the site has, for the past six years, been considered and proposed for residential led development. To introduce further protections on the current uses would therefore negate this planning objective and conflict with current proposals. Furthermore, to introduce such protections by this policy would essentially de-designate the site for true residential or residential led development, conflicting with previous planning permission for the site for over 6 years, and have severe implications for current development proposals that are in the pipeline in the borough. The DLP should provide some clarification in the supporting text:</p> <p>In Part A reference is made to "well designed employment use", However, no further clarity is provided on what exactly this is. A clear definition of a "well designed employment use" should be</p>	

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Policy 40: Approach to Non-Designated Employment Land				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			<p>provided as well as specific criteria that this can be assessed against.</p> <p>Part D of the Policy requires replacement employment floorspace to be fitted out to a standard above shell and core, and yet flexible and adaptable for different uses. This wording is not clear, and is wholly contradictory. L&Q has significant concerns about deliverability and impacts on development viability if shell and core is not the basic standard expected, and where and end user is not known.</p> <p>Reference is made to the Draft London Plan Policy E7, specifically wording "No reasonable prospect of the site being retained in employment use". However, no specific guidance is provided as to how this would be defined or determined. The DLP should be updated provide this level of detail. Part C of the policy text that reads "Ensures there are no impacts to sensitive non-employment uses, in line with the 'Agent of Change Principle'" is restrictive and the text should be amended to read "Mitigates against impacts on sensitive non-employment uses, in line with 'Agent of Change Principle'". This aligns closer with the Agent of Change Policy and allows some flexibility.</p> <p>Furthermore, by saying there is no reasonable prospect of a site being retained for employment uses is too subjective. The policy should be amended to allow decision makers to consider benefits from redevelopment and positive impacts of other uses on a site, where it can be demonstrated they would be more desirable and/or beneficial to the wider borough or local community. Given the underperformance of some of the non-designated employment areas in the borough (which is acknowledged) and the fact that other policies or AAPs purport differing and conflicting development objectives for such sites, some of the sites, such as LBWF9 Skeltons Lane should not be protected as part of the DLP. Further care must be taken to ensure other policies within the DLP do not conflict with the</p>	

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Policy 40: Approach to Non-Designated Employment Land				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			development approaches contained within the AAP, otherwise this could have severe implications for the development planning of sites that has and is occurring currently for these sites.	
1912	Mike Chrimes		Policy 40 derivation of classes needs to be explained somewhere. Section E needs rewriting eg use of floorspace, disrupt ? Exist access and transport connectivity?	Noted for consideration. Amend the glossary to detail the table of planning use classes.
2267		St William Homes LLP	Paragraph 9.23 refers to the boroughs Employment Land Review (2019) which has identified the borough's non-designated employment sites that are low performing, located in residential areas and in close proximity to public transport as suitable locations for mixed-use co-location. Site "LBWF14 Lea Bridge Gasworks" is referenced, with an option to "protect and intensify". The 2019 Employment Land Review states the following: "This site is earmarked for residential, However, any remaining opportunities for co-located workspace and residential should be pursued. This would reflect the approach being taken at Clarendon Works (Wood Green), where workspace is a fundamental component of the proposals by St William."	This point is noted for consideration. The Council is preparing an additional Local Plan document on site-specific allocations. This will provide an opportunity to apply the policies of the plan on specific sites, providing more details on how new developments could be integrated within existing local areas. This document will focus on identified 'Areas of Change and Opportunity'. This document will be prepared with public participation providing the opportunity for resident views to shape the nature and form of development likely to be considered acceptable.
2268		St William Homes LLP	St William is concerned with the current approach set out in Policy 40 for the following reasons: c The London Plan 2019 Paragraph 6.4.5B states that "The principle of no net loss of floorspace capacity does not apply to sites used for utilities infrastructure or land for transport functions which are no longer required". There is therefore no expectation that gasworks sites should provide industrial floorspace due to the challenges of delivery. c Paragraph 9.21 of Policy 40 refers to applications involving the re-use or redevelopment of a Use Class B site for an alternative non-employment use. Gasworks sites are not Class B use, rather they are Sui-Generis. For this reason, Policy 40 should not apply to Gasworks sites. c 2019 Employment Land Review refers to Clarendon Works. This is a	Noted. The policy will be updated to ensure general conformity with the London Plan.

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Policy 40: Approach to Non-Designated Employment Land				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			not comparable. The wider (non-gasworks site) site contains existing Class B warehousing. c London Plan 2019 Policy H1B(2)(d) recognises the specific role of surplus utilities sites in meeting London's housing need, and this policy aspiration should be prioritised. We consider therefore that Site "LBWF14 Lea Bridge Gasworks" should be removed from Policy 40 supporting text 9.23.	

Policy 41: Offices and workspaces				
ID	Full Name	Organisation	Comment	Council (Officers) Response
1362	Jennefer Peters	Senior Strategic Planner, London Plan Team Greater London Authority	New B1a office development should be directed towards the borough's district centres and some neighbourhood centres, as set out in Paragraph 9.24 of the draft Local Plan and should be avoided within industrial sites, including Blackhorse Lane SIL as currently proposed in draft Local Plan policies 7 and 15. This should be made explicitly and consistently clear throughout the draft Local Plan to avoid uncertainty and draft Policy 41 part D should also be amended accordingly. Steering office development to town centre locations will contribute to the vibrancy and vitality of those areas and will bring the approach in line with Policies E1, SD1, SD4, and SD5 of the draft new London Plan If and where office clusters are identified, then the authority should consider establishing article 4 directions to prevent the permitted development of offices to residential in the absence of planning permission.	This comment is noted in preparing the new Proposed Submission Local Plan. Policy 41, part D will be amended accordingly to avoid steering new office development to the Blackhorse Lane SIL.
1363	Jennefer Peters	Senior Strategic Planner, London Plan Team Greater	WF should define 'affordable workspace' in draft Policy 41 in accordance with draft new London Plan policies E2 and E3. In the draft new consolidated London Plan, there is a clear distinction between affordable workspace and suitable business space. Affordable workspace should be secured through section	This comment is acknowledged, and the definition of affordable workspace will be amended in line with the draft New London Plan policies E2 and E3.

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Policy 41: Offices and workspaces				
ID	Full Name	Organisation	Comment	Council (Officers) Response
		London Authority	106 agreements for a specific use or identified purpose or group, whereas suitable business space should result from large office development proposals, greater than 2,500m ² (or a locally determined threshold) that would trigger a requirement for a proportion of low cost and smaller commercial space.	
1397	Blackrock and NEAT Development		The thrust of the policy is in general conformity with New London Plan Policy SD1 and E1.	Noted.
1398	Blackrock and NEAT Development		Part B should take into account viability (New London Plan Policy E3)	Noted for consideration.
1399	Blackrock and NEAT Development		We support Part D's emphasis on promoting regeneration initiatives in the Blackhorse Lane CEZ.	Noted. Support welcomed.
1400	Blackrock and NEAT Development		We recommend making explicit reference to the Blackhorse Lane CEZ within the first paragraph of the policy. Further part B of the policy should be amended to ensure affordable workspace is provided where viable.	Noted for consideration.
1623	Bob Bennet		The policy is supported but some reference should be made to the current article 4 direction that removes the GDPO permitted changes of use from B1 (a) uses to C3 residential uses	This comment is noted in preparing the Proposed Submission Local Plan.

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Policy 42: Creative Enterprise Zone				
ID	Full Name	Organisation	Comment	Council (Officers) Response
1365	Jennefer Peters	Senior Strategic Planner, London Plan Team Greater London Authority	The Mayor's Creative Enterprise Zones (CEZs) as defined in the Glossary to the draft new London Plan have already been awarded and WF should therefore rename its creative areas to avoid confusion. Policy 45 and references to Blackhorse Lane Creative Enterprise Zone should therefore also be amended accordingly.	This point is acknowledged. Blackhorse Lane Creative Enterprise Zone will be amended accordingly.
1401	Blackrock and NEAT Development		The thrust of the policy is in general conformity with New London Plan Policy HC5, However, it is recommended further refinements are made to better align more closely with Policy HC5 and Policy H3 (with regard to affordable workspace).	Noted for consideration.
1403	Blackrock and NEAT Development		It is recommended part B makes specific reference to acceptable use classes e.g. B1(a)/(b)/(c) and B2.	Noted. However, B1 (a) is not considered a suitable use.
1404	Blackrock and NEAT Development		Part C should be amended to confirm such workspace should be provided where viable (in line with our comments on Policy 41).	Comment noted and will be included.
1405	Blackrock and NEAT Development		Part D should be amended to accurately reflect London Plan Policy HC5 part C(4) to "development should encourage the temporary use of vacant buildings and sites for creative workspace and activities".	The comment is noted and Waltham Forest Council will consider how best it can ensure general conformity with London Plan Policy HC5.
1884	Mr Modomo	Modomo HQ	The London Borough of Waltham Forest's Draft Local Plan presents a welcomed acknowledgment of meanwhile use.	Support noted.

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Policy 43: Local Jobs, Skills and Training				
2631	Ms Kate Bundock		There must be residents who need help with numeracy and literacy to improve CVs for job applications.	Ensuring Waltham Forest residents have access to skills, training and employment is a key priority of Waltham Forest Council. The Council has an Employment and Skills department to ensure local people have the skills and ability to capture the opportunities of growth and to access high-quality employment in the borough and across London.

Policy 44: Railway Arches				
ID	Full Name	Organisation	Comment	Council (Officers) Response
2339	The Arch Company		Draft Policy 44 (Railway Arches) The Council recognises that the borough benefits from “an ample supply of underused and vacant railway arches, providing opportunities for active use” which are capable of accommodating a range of uses from employment activities, including office (B1a), light industrial (B1c), general industrial (B2) and/or storage and distribution needs (B8), to retail (A1), restaurants/cafes (A3), drinking establishments (A4) and assembly and leisure (D2) opportunities, i.e. around station hubs (see paras. 9.35 & 9.36). Railway arches can therefore cater for a wide range of users and uses and assist LB Waltham Forest in achieving its ambition of boosting ‘vitality and vibrancy’ of areas surrounding the arches including town centres, new developments and existing communities. The Arch Company supports the flexible wording of Draft Policy 44 which encourages new development and, where required, the re-purposing of the borough’s railway arches in order to optimise their use. For this to be achieved it is imperative for relevant policies to support all relevant, suitable and appropriate uses in the arches including those identified under ‘sub-heading A’ stating that it supports “current and future B1a, B1c, B2 and B8 uses, D and A Class uses especially where by station hubs, Town Centres or as part of wider regeneration schemes”, such as the proposed redevelopment of the Land at Joseph Ray Road referred to	Support of policy 44 noted. The Council acknowledges your point regarding removing ‘affordable’ from Paragraph 9.35 to avoid future misinterpretation.

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Policy 44: Railway Arches				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			<p>above which anticipates to use the arches for a variety of uses. Our client further acknowledges the remainder of the draft policy wording and its requirements which are considered to form the basis of any type of new development within, adjacent to or surrounding railway arches. In relation to the affordability of workspace within existing railway arches, it is recommended to change the supporting text of Draft Policy 44 in Paragraph 9.35 to remove reference to 'affordable' locations for employment activities (B uses) in order to avoid any misinterpretation. A number of railway arches may offer low-cost business space at market levels reflective of their (often) non-prime locations (as acknowledged in para. 6.2.2 of the Draft London Plan), but there is no evidence base to confirm that (all/many) railway arches are capable of offering affordable employment- and/or workspace. Whilst they may offer low-cost business space in certain locations, we would like to avoid a misconception in this area with wider policies in the Draft Local Plan (i.e. Draft Policy 41) and/or the definition of 'affordable workspace' contained in the Glossary.</p>	

Chapter 10: Promoting Culture and Creativity

Policy 45: Promoting Culture and Creativity				
ID	Full Name	Organisation	Comment	Council (Officers) Response
241	Valerie Muscutt		<p>Adult education has been slashed decades ago - what has replaced this? Surely all groups in the community can promote culture themselves.</p>	<p>The Local Plan and planning system are not statutorily responsible for adult education funding. However, it does ensure that sufficient space is planned for and policies relating to this are in the Social and Community Infrastructure Chapter. The Local Plan can also collect money for training and apprenticeship and a policy related to this is in the Local Plan</p>

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Policy 45: Promoting Culture and Creativity				
ID	Full Name	Organisation	Comment	Council (Officers) Response
				Economy chapter. The Local Plan seeks to protect existing places for cultural events and cultural/creative jobs, and ensures there are spaces for this to happen in the future.
270	Nur Karatas		More cultural events	The Local Plan does not have statutory duty to require more cultural events, however, it can support the delivery of more cultural events by protecting existing cultural event space and planning for new cultural event space where appropriate.
424	Mr P Heatherley		Chingford Assembly Hall has been significantly underutilised for several years due to excessive charges being levied by LBWF. Local bodies should be entitled to use this facility for minimal charge.	The Local Plan and planning system are not statutorily responsible for charging for the Chingford Assembly Hall.
488	Ms Alison Hill		I welcome creativity being encouraged and have enjoyed additional one day workshops (for example) myself in local areas. and keeping pubs open is good as they have a place in the community. There is a lot of words here without saying much at all but if rents are kept a sensible levels then businesses can survive, but I remember reading about a small business that could not afford the cost of setting up a stall at one of the events in Lloyd Park so maybe this needs to be considered, and several shop have not managed to saty afloat (Ecko, the Grill House in Hoe st being two) Not sure if that was rent costs or lack of interest	The Local Plan has a policy for affordable workspace in the Employment Chapter and one of the sectors this is aimed at is the creative sectors. Affordable workspace policy is similar to affordable housing and aims to keep rents lower to allow businesses the space to grow. The Local Plan is also committed to safeguarding existing cultural space including pubs.
501	Ms Kate Bundock		There is one library in Chingford. We hear that the former South Chingford library in Hall Lane will be demolished and with the ground around it will be replaced by housing. The Age UK amenity has not (so far) been given alternative accommodation for its continued work, which includes classes for older adults as well as advice sessions. Chingford Assembly Hall has few bookings, with high hire and deposit (for damages) fees it wont be used. If not used, deterioration will set in. It should become a community hub - as a hall is in a village. The Walthamstow Assembly Hall is a borough amenity, and a music venue. We lost	These comments are noted for further consideration.

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Policy 45: Promoting Culture and Creativity				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			the amenities of Friday Hill house, the little Louisa Oakes House in Hall Lane - there is nowhere else for leisure with learning and new creative pastimes. Not everyone wants to travel to other parts of the borough to set up a group with shared interests. as a "Borough of Culture" a chance has been missed to use some money for a tangible legacy of a community nature.	
991	The City of London	The Conservator's of Epping Forest	The City Corporation is disappointed to see references to cultural attractions at 10.4 (p99) restricted to the Lee Valley, London Wildlife Trust and borough's own cultural facilities. Reference to the Epping Forest cultural facilities within the borough including The View Visitor Centre and the Queen Elizabeth's Hunting Lodge, together with the Epping Forest Collection which has enjoyed accredited Museum status for the past three years, has been overlooked, despite their inclusion in the London Borough of Culture. It is hoped that promotional Policy 45 (page 100) will include support for the Epping Forest elements of the borough's culture.	Noted a reference to Epping Forest will be included.
1073	Ms Alison Blom-Cooper	Planning Department Epping Forest District Council	Chapter 10 Figure 10.1 on page 99 includes reference to the EFSAC but there is no commentary or signposting within the chapter itself which would be beneficial to understanding.	This comment is noted for clarification.
1109	Olexandra Stepaniuk		Place making. I agree with this.	Noted, placemaking policies are noted in spatial strategy, culture and design policies.
1371	Jennefer Peters	Senior Strategic Planner, London Plan Team Greater London Authority	The draft plan's ambition to support culture and creative industries in the borough is welcomed and builds on the draft new London Plan's emphasis on the celebration of London's diverse and complex cultures and creative industries as set out in Policy HC5. WF's ambition to locate development proposals for major arts, culture and entertainment within the borough's town centres is supported and will help to diversify uses in	Support and conformity with the London Plan noted. The Council is currently working on a cultural infrastructure plan that will provide a wider strategic approach to culture and creative industries.

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Policy 45: Promoting Culture and Creativity				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			accordance with draft new London Plan Policy SD6 and in response to new challenges brought about by emerging technology and changes in consumer behaviour. The Mayor would be supportive of a wider strategic approach to culture and creative industries, underpinned by local and up-to-date evidence and also through collaborative working with existing businesses and organisations in the area.	
1387	Emily Wheeler		I would also like to see explicit and concrete reference to the redevelopment of the Regal cinema as a working cinema, which will be central to the regeneration of the area. The council has said it supports this but it seems to be missing?	Noted. Regal Cinema will be added to Policy 20 Highams Park Strategic Location and Chapter 10 Promoting Culture and Creativity.
1406	Blackrock and NEAT Development		We are broadly supportive of the Policy and consider it to be in general conformity with New London Plan Policy HC5. However, further refinement is sort to part D of the policy in terms of the definition of the 'principles of colocation' clarity is sought as to whether this is meant with reference to New London Plan Policy E7.	Noted. Support Welcomed. The Draft Plan was submitted to be in general conformity and alignment with the Draft London Plan Policy E7: Industrial Intensification, Co-location and Substitution.
1407	Blackrock and NEAT Development		Amendments are sort to part D of the policy to clarify the 'principles of co-location' for example as to whether this means those included at paragraphs 9.14 and 9.15 of the New Local Plan.	This comment is noted for further discussion.
1467	Ms Hanna Chalmers		I would also like to see explicit reference made to the redevelopment of the cinema at the Regal - an odd omission given various statements of support from the council.	Noted. Regal Cinema will be added to Policy 20 Highams Park Strategic Location and Chapter 10 Promoting Culture and Creativity.
1546	Mark Furnish	Sport England	Sport England would highlight that such uses, including meanwhile or temporary events/uses, should not take place on playing fields as this would not only prevent sport being played while the use is in situ but it could also erode the quality of the playing field thereby affecting the amount of games that could be played on it in the long-term. Similar implications, albeit to a lesser extent, could occur within certain built sports facilities and some cultural activities. Sport England would object to any	Noted.

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Policy 45: Promoting Culture and Creativity				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			uses/proposals that would detrimentally affect the quality of sports facility or affect the use of the facility.	
1624	Bob Bennet		This policy is welcomed but it should also be recognised that the needs of cultural businesses may need to be associated with other uses such as cafes, retail etc. Creative thinking is also required amongst decision makers.	Noted. The Council has many cafe's that operate alongside cultural hubs across the Borough.
1660	Christine Lewington		There is no mention of the Regal cinema which - like the station - is geographically at the centre of Highams Park and could be very much central to the "cultural heart" of Highams Park. It constitutes a unique opportunity to breathe more life into the area. There have been no updates regarding this for quite a while which seems surprising, especially given the current Borough of Culture efforts. There is also no explicit commitment to retain Hale End Library, which local residents have fought very hard for, and which again contributes significantly to the "cultural heart" of our community.	This comment is noted. The Council is committed to working with the Highams Park Planning Group and other stakeholders to ensure the delivery of the Regal Cinema.
1676	Kevin King		I would also like to see explicit reference made to the redevelopment of the cinema at the Regal - an odd omission given various statements of support from the council.	This comment is noted. The Council is committed to working with the Highams Park Planning Group and other stakeholders to ensure the delivery of the Regal Cinema.
1878	Mr Modomo	Modomo HQ	The London Borough of Waltham Forest's Draft Local Plan presents a welcomed acknowledgment of meanwhile use.	Support noted.
1879	Mr Modomo	Modomo HQ	Draft Policy 43, 45 and 49 in the draft local plan all engage with a range of meanwhile uses and locations, but these are principally concerned with commercial uses.	Comment noted for consideration.
1880	Mr Modomo	Modomo HQ	There is currently no recognition or mention of residential as a meanwhile use and Modomo request recognition of housing as a potential meanwhile use is included within the New Local Plan.	Noted. The Council does not need to repeat policies in the London Plan.

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Policy 45: Promoting Culture and Creativity				
ID	Full Name	Organisation	Comment	Council (Officers) Response
2329	Mike Chrimes		The council should take the lead by encouraging use of the cultural sites it owns to attract similar businesses	The Council agrees with this. Creative businesses are an important part of the local economy and support the cultural offering in the Borough.
2606	Nur Karatas		Creative work related to different culture to make them more connection where they are living currently	The Local Plan does not have statutory duty to require creative work related to different cultures. However, it can support the delivery of more public art via Section 106, where appropriate.
2607	Daf Bergin		I'd like to see more theatre, better use of the expensive assembly hall	The Local Plan protects existing cultural event spaces and plans for new cultural event space where appropriate.
2608	Mr Tom Clarke MRTPI	National Planning Adviser Theatres Trust	We welcome inclusion of Policy 45 which supports and protects the borough's valued cultural facilities including its theatres. This is consistent with Paragraph 92 of the NPPF (2019) and both the existing and emerging versions of the London Plan.	Noted. Support welcomed.
2609	Mr Tom Clarke MRTPI	National Planning Adviser Theatres Trust	Similarly, we also support Policy 46 which protects the borough's pubs.	Noted. Support welcomed.
2610	Mrs Krysia Sivyer		Hasn't worked in North Chingford! 2 pubs have recently closed. I do not support protection of pubs unless opening hours are restricted. The residents find it very stressful to be near noisy pubs and clubs open until the early hours of the morning. Pubs and clubs with a focus could work, e.g. comedy, book clubs, music clubs etc	This comment is noted. Unless there is a specific condition restricting hours of operation imposed through a planning condition, drinking establishment opening hours are controlled via the licensing regime. Licensing is not part of the Council's planning function and does not fall within the ambit of the Local Plan. The Local Plan sets out a framework that includes policies intended to protect local pubs to supplement the protection given to them in legislation.
2611	Mrs Krysia Sivyer		Epping Forest is a very important feature. It is recognised we need to have more trees, so any suggestions of encroaching on forest land should be resisted.	This comment is noted. There are no proposals on the Local Plan that would involve encroaching on Epping Forest. The Epping Forest is ancient woodland which is afforded the highest level of protection in EU and national legislation. Accordingly the Local Plan seeks to minimise and mitigate any potential harmful effects of development on Epping Forest.

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Policy 46: Protecting Pubs				
ID	Full Name	Organisation	Comment	Council (Officers) Response
1012	Lauren Lavinieri		Policy 47 - In line with my general comment above, this policy does not clearly set out the strategy for allocating retail floorspace needs across the designated centres. For example, how much retail floorspace is planned/targeted for south and north Chingford? This information would help direct investment decisions and improvements in accordance with the hierarchy. There are a number of sites and buildings particularly in south Chingford/Chingford Mount which are vacant and in disrepair and should be encouraged to be brought into use.	Noted. There will be a separate Draft Site Allocations document, which will be published for consultation in 2020.
1046	Mr Tim Brennan	Historic England	We welcome clause c dealing with pubs with heritage value. To reflect national planning policy, we would suggest amending the final sentence to read '...the design, character and heritage significance of the existing premises or the wider streetscape.'	Noted. We will include these comments as suggested. Noted, Regal Cinema will be added to the Highams Park and cultural policy.
1625	Bob Bennet		The policy is supported but should be rewritten in a more positive way that there will be a presumption against a change of use of a pub to another use unless certain rigorous criteria can be met. It is also very difficult to assess the viability of a pub use, because there are many local examples where a change of ownership or management has changed a non-viable pub operation into a thriving business e.g. The Bell!	The comment is noted. The Council will look to make the wording stronger that there is a presumption against the change of use of a pub.
1841	Mr John Hugill		I was glad to see that you have a policy to protect pubs "the heart of the community", what does that mean for The Station House Pub?	Support noted. The Local Plan does not provide specific details on individual pubs.
2895	Mrs Krysia Sivyer		Hasn't worked in North Chingford! 2 pubs have recently closed. I do not support protection of pubs unless opening hours are restricted. The residents find it very stressful to be near noisy pubs and clubs open until the early hours of the morning. Pubs and clubs with a focus could work, e.g. comedy, book clubs, music clubs etc	Noted. Policy 47 in the emerging Local Plan strengthens Waltham Forest Council's commitment to protecting pubs in borough as their general benefit to the community is recognised. Public House opening hours are subject to public house licensing legislation, and are not a consideration for the Local Plan.

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Chapter 11: Distinctive Town Centres and High Streets				
ID	Full Name	Organisation	Comment	Council (Officers) Response
56	Margaret Carvell		The survey that this proposal is based on was taken 2016, the state of shops that have closed in Station Road is much higher than the 59 mentioned, something needs to be addressed about penalising or incentivising landlords to rent out their empty shops	The Council's evidence base study on Town & Retailing was is dated 2019. It is based on current available evidence. Clearly, this will include some historical information. Accordingly, there is a commitment to carry out periodic updates to this study. The issues affecting the vitality and viability of the Borough's town centres are complex. This includes the economic downturn, the growth in internet shopping, changed shopping habits and the continued influence of out-of-centre shopping. The Council is addressing these challenges locally in a number of ways e.g. through the preparation of town centre strategies and other regeneration initiatives for the designated centres, including North Chingford.
85	Andrew Sivyer		Discourage charity shops, nail bars, fast food outlets, estate agents.	This point is noted. However, in practice Waltham Forest Council has limited control over some changes of use, for example those permitted by the use classes order. Accordingly, a shop selling books or electrical items could become a charity shop without requiring planning permission.
86	Andrew Sivyer		Encourage small 'Village' feel, avoiding usual fashion chains, etc	This point is noted.
122	Rachel Thomas		Maintaining and preserving the High Street is crucial. The shops will close without help. Refer to how "St Albans" civic society is approaching this challenge.	This point is noted.
131	Mr David Matson		The retail policy seems well developed. But it is impossible to understand the basis for policy without seeing the Waltham Forest retail and town centres study 2019. Please release and circulate ASAP	The Waltham Forest Retail & Town Centres Study (2019) is published on Waltham Forest Council's website.

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ID	Full Name	Organisation	Comment	Council (Officers) Response
143	Anthony Lyons		We are concerned that Church Road has been identified as site for a local parade. Church Road is a residential area surrounded by schools and parks. We worry that expansion of shops as a local parade would damage the tranquility of the area which has improved in recent years. Indeed, since the local pub has closed down we feel safer and sleep better at night. It's also evident that local shops have been converted into residential properties so we believe it is best not to impose further shops.	Local Retail Parades represent the lowest tier in the hierarchy of centres. They consist of small clusters/parades of shops containing at least five units which serve their immediate catchment area for local convenience shopping needs. There is an existing cluster of shops along the Church Road frontage designated for protection in the current Local Plan. The Council considers that these shops must be safeguarded to provide local accessible shopping facilities for nearby residents.
144	Anthony Lyons		We are very pleased to learn that there are plans to improve the shops on Lea Bridge Road and Leyton High Road. These two high streets serve Church Road. We feel the Lea Bridge Road and Leyton High Road are better suited to expansion in relation to shops.	This point is noted.
145	Anthony Lyons		We therefore hope that the Draft Plan will focus investment in commercial shops and spaces on Lea Bridge Road and Leyton High Road.	The Council is addressing the challenges facing town centres and commercial areas in a number of ways e.g. through the preparation of town centre strategies and other regeneration initiatives for all designated centres.
195	Miss Anna Misterska		Great plans, I would like to see more shops, cafes, restaurants and night-time economy in the area.	This point is noted. The draft Local Plan contains policies to encourage these activities within designated centres and parades.
200	Anthony Lyons		We are very pleased to learn that there are plans to improve the shops on Lea Bridge Road and Leyton High Road. These two high streets serve Church Road. We feel the Lea Bridge Road and Leyton High Road are better suited to expansion in relation to shops. We therefore hope that the Draft Plan will focus investment in commercial shops and spaces on Lea Bridge Road and Leyton High Road. We also hope that the Draft Plan will continue to focus on community activities in Jubilee Park and supporting local schools on Church Road.	Support noted. The draft Local Plan focuses retail and other town centres activities in designated centres and parades. Local Retail Parades represent the lowest tier in the hierarchy of centres. They consist of small clusters/parades of shops containing at least five units, which serve their immediate catchment area for local convenience shopping needs. There is an existing cluster of shops along the Church Road frontage designated for protection in the current Local Plan. The Council considers that these shops must be safeguarded to provide local accessible shopping facilities for nearby residents.

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ID	Full Name	Organisation	Comment	Council (Officers) Response
258	Claire Watson		Facilities needed in Highams Park: Butchers, Bakery, Framers. Less fast food outlets. County Arms improved.	This point is noted. The draft Local Plan seeks to encourage a range of retail and other town centre activities in the designated centres and parades.
259	Claire Watson		Renovating the shop's frontage made a real improvement. Continuing this down Winchester Road and on the other side of the tracks would really improve the image of the area.	This point is noted for consideration.
361	Mike Chrimes		The area shown has been incorrectly defined	It is proposed to review and correct the information included on the maps provided.
362	Mike Chrimes		Little understanding of the character of the individual centres.	The Council is addressing the challenges facing its town centres in a number of ways such as through the preparation of town centre strategies and other regeneration initiatives. Further information about these initiatives will be published.
363	Mike Chrimes		Transport needs are poorly understood.	The Local Plan will be supported by an Infrastructure Delivery Plan, which will set out details of the borough's infrastructure requirements including transport. This document will set out what is needed, where it is needed and when it is needed. This document will be published with the final version of the plan.
364	Mike Chrimes		The relative success of secondary centres is overlooked - there are generally less empty units there.	The policies in the draft plan seek to support the vitality and viability of all of the boroughs designated centres, not just Walthamstow Town centre, but both District and Neighbourhood centres as well as the designated local retail parades representing the lowest level in the hierarchy of centres.
365	Mike Chrimes		The potential for the night-time economy is underplayed.	Policy 53 of the draft plan acknowledges the role of the evening and night-time economy in Waltham Forest and seeks to encourage these activities at the most appropriate locations.
435	Ira Dubinsky		Blackhorse Lane has the potential to support significant medium and small-scale retail development. The addition of over 1500 homes requires investment in retail to support the growing population including supermarkets, speciality food stores, cafes, restaurants, bars, and other shops. It would be	This point is noted. However, evidence from the Waltham Forest Retail and Town Centres Study 2019 does not support the provision of additional retail facilities at the present time. This is mindful of the current conditions in the retailing industry. The policies of the plan seek to create conditions for

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			good to encourage a mix of larger chains and smaller independents.	retail activities to thrive and for redevelopment opportunities improve existing retail offer including the attraction of smaller independents.
445	Mr Jeremy Clayden		Residents of Highams Park say that the development work that has already happened in the area has not made the area more vibrant, instead it has led to businesses and shops closing down. It has also led to overcrowding and more travel frustration at the station. The Local Plan does not define what it means by 'vibrant' and does not specify how the Council measures 'vibrancy' or how it would know if an area was more or less vibrant. The Local Plan makes no distinction between vibrant and overcrowded. The plan should be modified to cover all these points and should include evidence that its proposals for town centres are proven to benefit the town and not damage the town.	The word 'vibrant' is a term used in planning policy documents including the National Planning Policy Framework (NPPF). In the context of town centres, it is about people using and enjoying a town centre - people coming, staying and spending money in the town centre. Clearly, several factors will contribute to the vibrancy of a centre - including the mix of uses, retail representation, the quality of the public realm, accessibility etc. Through town centre health checks, Waltham Forest Council has been monitoring the performance of its town centres. The Council is also addressing the challenges affecting its town centres in a number of ways such as through the preparation of town centre strategies and other regeneration initiatives. The policies in the plan seek to protect the vitality and viability of the borough centres.
455	Mrs Krysia Sivyer		Development of the High Street in North Chingford could provide work opportunities. Lots of different venues need to be encouraged as traditional shops are not so successful now because of the Internet. Small, independent traders with artisan products, small performance outlets for music clubs, cinema clubs etc. Reasonable rates and rents so that small businesses can succeed. Also maybe a health centre, child care services, shop for borough services, leisure activities (gyms, soft play for children etc).	This point is noted. The Council is addressing the challenges affecting its town centres in a number of ways such as through the preparation of town centre strategies and other regeneration initiatives. The policies in the plan seek to protect the vitality and viability of the borough centres and encourage a range of uses such as those mentioned.
469	Mr Tushar Kelkar		Blackhorse Lane should be elevated to a district centre in light of the regeneration expected.	This point is noted. However, the elevation of a centre from 'neighbourhood' to 'district' level must be justified by evidence and coordinated at both borough and London wide level to manage trading effects on nearby centres. Evidence from the Waltham Forest Town Centres and Retail Study (2019) does not support the suggested change.

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489	Ms Alison Hill		I think the size of the various centres is adequate though I don't personally use the local area much for retail or cafes/restaurants. We could do with a good department store in the borough though I don't think that has to be in Walthamstow Central. The idea of making that bigger is obvious but not necessarily the best idea. Why not encourage a shift of the CBD to Leyton for example. Walthamstow has its famous market with farmers market also on Sundays. Lets keep it small and local and different.	Walthamstow Town Centre is the primary retail centre and economic heart of the borough. It is identified as a Major Centre in the London Plan. In accordance with national planning policy, proposals for major town centre uses must be determined in accordance with the sequential test, which in practice works to give preference to larger than smaller centres, subject to the scale of the proposal and its role and function within the catchment area. On this basis, a large department store with borough wide catchment is more likely to be acceptable on policy grounds in larger than smaller centres. The point made about shifting the economic heart of the borough to Leyton would require significant level of investment to implement which is difficult to justify given current economic conditions.
509	Ms Angela Rouse		I support the point stated that to retain and develop their vibrancy and vitality, the designated centres must also have an appropriate mix and balance of not only retail, but leisure, cultural and service provision which all contribute to a centre's success. Linking to Chapter 22 on economy, more could be done to enable food & drink businesses to start up in the borough, besides the work done at Leytonstone Cricket Pavilion. There is the opportunity for food to contribute as many as 25,000 further new jobs a year and contribute an additional £500m to the economy in London (Source: NESTA) so it would be strategic to make provisions to attract some of this inward to the borough and that could be done by creating provisions in the town centres and high streets for food & drink business start-ups.	The Council notes the statement of support provided. The plan supports job creation in all sectors of the economy including food and drink businesses.
516	Mrs Claire Ford		No support for enhancing North Chingford as a district retail centre, continuing a lack of support under the existing plan.	The policies in the draft plan seek to support the vitality and viability of all of the Borough's designated centres, including North Chingford District Centre. The Council is addressing the challenges affecting its town centres in a number of ways such

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				as through the preparation of town centre strategies and implementation of other regeneration projects and initiatives.
581	Mr Len Banister		Highams Park is generally rundown, its most important feature is the Regal Cinema, which has been an eyesore for years. The centre needs to be smartened, some shop frontages have been improved, but new pavements are already breaking up. There is also a dominance of fast food outlets and shuttered shops.	The Council is addressing the challenges affecting its town centres in a number of ways such as through the preparation of town centre strategies and other regeneration initiatives. Further information on these initiatives will be published.
735	Christine Sandford		Lets keep some of the charity shops and 90p shops- the recycling aspect of charity shops is so green and progressive.	The policies in the draft plan seek to support the vitality and viability of the Borough's designated centres. It seeks to encourage an appropriate mix of uses/variety of shops.
1011	Lauren Laviniere		Town centre policies - Town centre strategies are essential to communicate the vision for the designated centres, based on their specific characteristics and opportunities. A commitment should be made to prepare (or update) these, and they should be considered in consultation with local businesses and town centre users (residents and visitors)	It is proposed to acknowledge this point by including a commitment under Policy 49 to prepare town centre strategies for all centres.
1085	Ms Alison Blom-Cooper	Planning Department Epping Forest District Council	The Council also welcomes the qualitative improvements sought to provide business space, cultural and retail facilities in the borough, particularly in the Central Area. In addition the policies protecting the growing of food and allotments are welcomed as is the suite of policies in response to climate change.	This pointed is noted.
1177	Neeru Kareer	Enfield Council	Enfield supports the growth of culturally rich and diverse mixed-use town centres which also seeks to boost the night time economy offer by providing several options for workers after office hours in Waltham Forest.	The Council notes the statement of support provided.
1178	Neeru Kareer	Enfield Council	Enfield is currently preparing Action Plans for Town Centres and would welcome an opportunity to review and discuss respective emerging supporting technical evidence, assumptions on retail and leisure floorspace and related impact on in terms of the levels of vitality and viability.	This is noted. The Council's evidence base documents including the Waltham Forest Town Centres and Retailing Study (2019) is published on the website. Opportunity to discuss these studies will be taken forward through Duty to Cooperate meetings.

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ID	Full Name	Organisation	Comment	Council (Officers) Response
1422	Colin Setchfield	The Parish Church of Saint Edmund	Before publishing its substantive Local Plan, LBWF may wish to address some inconsistency in the naming of district and neighbourhood centres. Pages 56 & 57 refer to the district centre within our parish as 'Chingford Mount' (the name used in other LBWF policy documents) though page 60 refers to it as the 'South Chingford district centre.' Page 60 also refers to the 'Chingford Mount neighbourhood centre' which on page 111 is the 'Chingford Mount Road' neighbourhood centre. Previous LBWF documents have always referred the area around the former Royston Arms pub as the 'South Chingford neighbourhood centre' or 'shopping centre'. The map on page 56 also places South Chingford erroneously in the area of Wellington Avenue.	This point is noted. It is proposed to correct the wording references made to Chingford Mount to read as South Chingford. It is proposed to correct the error on the map where it refers to 'South Chingford' and 'Chingford Mount'.
1423	Colin Setchfield	The Parish Church of Saint Edmund	Designating the district centre around the Prince Albert crossroads as 'Chingford Mount' and the shopping parades south of this as 'South Chingford' accords better with other LBWF documents and also terminology used locally.	This point is noted for correction to reflect the terminology used in previous plan documents.
1424	Colin Setchfield	The Parish Church of Saint Edmund	Though this may seem a minor issue, the inconsistency does leave the impression that LBWF is less focussed or less briefed on this part of Waltham Forest in comparison to other districts. While acknowledging the investment of £750K in public realm and building refurbishment at Albert Crescent in 2013, there is a local perception (which we share) that this District Centre is not as well served or resourced in comparison with others across the borough, although it is a vibrant shopping area, with a variety of uses and few empty shops.	The Council is addressing the challenges affecting its town centres in a number of ways such as through the preparation of town centre strategies and other regeneration initiatives. Further information these initiatives will be published.
2036	Peter Drew		With the new homes, how will local GP services cope?	The Local Plan will be supported by an Infrastructure Delivery Plan, which will set out details of the borough's infrastructure requirements. This document will set out what is needed, where it is needed and when it is needed. This document will be published with the final version of the plan. Policy 2(c) makes clear that planning permission will only be granted for

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				new development if it can be demonstrated that there is, or will be, sufficient infrastructure capacity to support and meet growth requirements.
2306	Mike Chrimes		When the Development plan was made available the section dealing with town Centres and Retail (Policy 19, section 5) referred to a Waltham Forest Retail & Town Centres Study in 2019, which underlies its overall town centres and retail policy (para. 11.2) yet this was not available when the consultation period began. The suggestion regarding primary and secondary location is quite radical yet as noted above seems to have little justification in relative performance of existing centres.	The Waltham Forest Retail & Town Centres Study (2019) is published on the website. The Council has been monitoring the relative performance of its town centres periodically through Town Centre Health Checks and the Authority Monitoring Report.
2373	Mike Chrimes		In Chingford and Wood Street night time economy has shrunk what is being done.	The Council is addressing the challenges affecting its town centres in a number of ways such as through the preparation of town centre strategies and other regeneration initiatives.
2376	Sue Wildridge		Dense new developments create issues for the whole range of services across the borough that need to be addressed. Already, it is difficult to get a GP's Appointment - how difficult will it be when a few hundred more people move into the area.	The Local Plan will be supported by an Infrastructure Delivery Plan, which will set out details of the borough's infrastructure requirements. This document will set out what is needed, where it is needed and when it is needed. This document will be published with the final version of the plan. Policy 2(c) makes clear that planning permission will only be granted for new development if it can be demonstrated that there is, or will be, sufficient infrastructure capacity to support and meet growth requirements.
2405	Ms Patricia Braga		Do not build on the green and ruin the character + Small shops mix.	The draft plan does not contain any proposals to build on the green space. The plan also seeks to encourage a mix of uses in town centre locations.
2551	Valerie Muscutt		Businesses closing- cafes + charity shops replaced these.	The draft Local Plan seeks to promote the vitality and viability of the designated centres and parades by protecting the loss of shops in primary frontages and encouraging a range of retail and commercial activities to remain.

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ID	Full Name	Organisation	Comment	Council (Officers) Response
2681	Mrs Claire Ford		Need to have an up to date retail survey across the borough, data about occupancy rates of shops etc is out of date. Vacancies are a real problem and were at 10%.	The Council's evidence base study on Town Centres & Retailing is dated 2019. It is based on current available evidence, but clearly, the need to ensure an up-to-date evidence base is acknowledged. Accordingly, there is a commitment to carry out periodic updates to this study. The issues affecting the vitality and viability of the Borough's town centres are complex. This includes the economic downturn, the growth in internet shopping, changed shopping habits and the continued influence of out-of-centre shopping. The Council is addressing these challenges locally in a number of ways e.g. through the preparation of town centre strategies and other regeneration initiatives for all designated centres, including North Chingford.
2682	Mrs Claire Ford		Inappropriate suggested 'build over' medium-rise development at Chingford bus station/DVLA car park (both owned by TFL) - mainly on the grounds that it is looking dilapidated.	The Council is preparing an additional Local Plan document on site-specific allocations. This will provide opportunity to apply the policies of the plan on specific sites, providing more details on how new developments could be integrated within existing local areas.

Policy 47: Hierarchy of Centres				
ID	Full Name	Organisation	Comment	Council (Officers) Response
1192	Rachel Kercani		Will there be another doctors surgery to cope with the extra population?	The Local Plan will be accompanied by an up to date Infrastructure Delivery Plan when it is published for consultation in the summer of 2020. The IDP will outline the need for GPs and health services and how such needed will be met through development.
1486	Sharlene Sarolli		In particular, I am most concerned about the local schools, GPS and parking. These are already under pressure and this plan will add to the already strained resources.	The Local Plan will be supported by an Infrastructure Delivery Plan, which will set out details of the borough's infrastructure requirements. This document will set out what is needed, where it is needed and when it is needed. This document will

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Policy 47: Hierarchy of Centres				
ID	Full Name	Organisation	Comment	Council (Officers) Response
				be published with the final version of the plan. Policy 2(c) makes clear that planning permission will only be granted for new development if it can be demonstrated that there is, or will be, sufficient infrastructure capacity to support and meet growth requirements.
1872	Miss Susan Murray		We were told last night that we are currently ten doctors short in this area as it is. What will happen when thousands more people join us over the next few years? We were told last night that NO GPs or the CCG are interested in our area. So how are you now going to work this? Is it legal to build where there is no infrastructure to support new people? Surely there has to be Drs and Dentists per capita legally?	The Local Plan will be supported by an Infrastructure Delivery Plan, which will set out details of the Borough's infrastructure requirements. This document will set out what is needed, where it is needed and when it is needed. This document will be published with the final version of the plan. Policy 2(c) makes clear that planning permission will only be granted for new development if it can be demonstrated that there is, or will be, sufficient infrastructure capacity to support and meet growth requirements.
1948	Sue Crisp		I object to the plans to redevelop both north and south Chingford. This area is already over populated with both local schools, doctors and Whipps Cross hospital over stretched close to breaking point.	The Local Plan will be supported by an Infrastructure Delivery Plan, which will set out details of the Borough's infrastructure requirements. This document will set out what is needed, where it is needed and when it is needed. This document will be published with the final version of the plan. Policy 2(c) makes clear that planning permission will only be granted for new development if it can be demonstrated that there is, or will be, sufficient infrastructure capacity to support and meet growth requirements.
2475	London Hotel Group	London Hotel Group	With the reference to Policy 47, and in Policy 48 B (ii), the site is located on the edge of the Bakers Arms District Centre. The Site is well connected by pedestrian links to the Centre, and the intensified use of the site will contribute to the objective of delivering vibrant centres which meets the needs of the local community. Any proposals would meet the relevant tests contained within Policy 48 'New Retail, Office and Leisure Developments', which we note is in line with the emerging London Plan and the NPPF.	It is noted that this comment seeks to justify a proposal submitted for planning application. This consultation seeks views on the draft local policies.

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Policy 48: New Retail, Office and Leisure Developments				
ID	Full Name	Organisation	Comment	Council (Officers) Response
660	Mr Oliver Williams		With regards to the Lea Bridge Water Works (Currently Thames Water Depot) The existing concrete slab could easily be removed in some areas and to reveal the buried filter beds below. A swimming / pond area should be created from a section of the old filter bed, reimagined as a place for wild swimming. The site should be re-wilded, allowing nature to reclaim the built environment naturally in some places and replanting and landscaping in others. The site should be a space for people to learn how to live harmoniously with nature, perhaps through small-scale good growing or sustainable foraging or a social enterprise or community garden centre like Growing Concerns in Tower Hamlets or Living Under One Sun sites in Haringey. It should be a place to showcase the area's industrial heritage by retaining and enhancing the site's historic buildings. It is a valuable part of the green lung, linking the Middlesex Filter Beds and the Essex Filter Beds and should be reconnected to the surrounding sites. Retaining an area of public hard landscaping would complement the surrounding area.	No allocations are made as part of the Local Plan, which is supported by a Green Belt and Metropolitan Open Land Study (2015-2019). The proposals to re-wild the area are noted. The Council is committed to maintaining the sensitive balance between the need for development and the protection of Green Belt and MOL.
720	Mr Gordon Turpin		We do not support ground floor residential accommodation in the Highams Park District Centre and support the Policy 53, which protects shops outside the designated centres and parades.	This point is noted.
781	LVRPA	Lee Valley Regional Park Authority	Whilst the draft Local Plan includes policy that supports the provision of leisure, culture and visitor facilities these are focused on directing development to major district centres and accessible locations. These policies would not then necessarily apply to the leisure and sporting venues located within the Regional Park and this leaves a policy gap. The location of the Regional Park's main venues either adjacent to or within the Strategic Locations does However, offer the opportunity to	This comment is noted and will be considered in the light of the Council's Open Space and Green and Blue Infrastructure Strategies which are due for completion. The Council considers access to the Lee Valley Regional Park to be of vital importance to the borough.

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Policy 48: New Retail, Office and Leisure Developments				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			include a supportive policy approach, one that recognises leisure as a key component of the growth agenda and the need to support their long-term sustainability and growth.	
1013	Lauren Laviniere		Policy 49B - Reference to core areas would be helpful to clarify the reference to vacancies - does this mean across the whole centre or whether the subject unit is vacant?	This point is noted. The policies map will identify the retail core areas as defined as 'primary shopping area' for all designated centres.
1084	Ms Alison Blom-Cooper	Planning Department Epping Forest District Council	The Council also welcomes the qualitative improvements sought to provide business space, cultural and retail facilities in the borough, particularly in the Central Area. In addition the policies protecting the growing of food and allotments are welcomed as is the suite of policies in response to climate change.	This point is noted.
2012	Dr Robert Gay		With regard to the siting of leisure uses, regard must be had to the point that the relaxation of licensing hours means that there is pressure for entertainment venues to be open well past midnight. In Leytonstone, the High Road is only one frontage deep and there is a public house open to 2am within 100 yards of people's houses in the side street.	Policy 53 acknowledges this point and includes a range of policy measures/criteria to guide the location and management of leisure and evening economy uses. The policy approach taken recognises the need for a coordinated approach linked with licensing policy.
2013	Dr Robert Gay		There need to be places accessible by public transport (and in particular, by the Night Tube at weekends) where 'bad neighbour' leisure uses (such as the club I mentioned at the meeting, which is open to 3am close to Mile End Tube, and which would certainly be a bad neighbour to a residential development on its site) can be accommodated without nuisance to residential occupiers.	This point is noted. The spatial approach taken seeks to accommodate growth in town centre uses including evening and night-time economy uses in the most accessible locations close to public transport.
2239	Capital and Regional Plc	Capital and Regional Plc	We generally support LBWF's approach to retail uses within the Draft Local Plan, namely Draft Local Plan Policy 48, which directs new retail, office, leisure and cultural/tourism, entertainment, hotel, community and other service uses to existing town centres, and Draft Local Plan Policy 49, which encourages new retail uses in primary shopping frontages to	The Council notes the statement of support provided on Policies 48 and 49.

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Policy 48: New Retail, Office and Leisure Developments				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			ensure that retail uses (use class A1) predominate on ground floors. We trust our comments will be acknowledged .	
2476	London Hotel Group	London Hotel Group	With reference to Policy 47, and in Policy 48 B (ii), the site is located on the edge of the Bakers Arms District Centre. The Site is well connected by pedestrian links to the Centre, and the intensified use of the site will contribute to the objective of delivering vibrant centres which meets the needs of the local community. Any proposals would meet the relevant tests contained within Policy 48 'New Retail, Office and Leisure Developments', which we note is in line with the emerging London Plan and the NPPF.	It is noted that this comment seeks to justify a proposal submitted for planning application. This consultation seeks views on the draft local policies.
2630	Ms Kate Bundock		More amenities are needed for leisure time activities - but without the space to build or develop them.	The Council acknowledges the need to have an appropriate mix and balance of space for leisure activities in the borough. Policy 48 New Retail, Office and Leisure supports the provision of new leisure uses in the borough's designated town centres.

Policy 49: Revitalisation, Adaptation and Regeneration in Designated Centres and Parades				
ID	Full Name	Organisation	Comment	Council (Officers) Response
634	Gordon Turpin	Highams Park Planning Group	We support the contraction of the designated primary frontage in Highams Park District Centre, however, Highams Park is not a comparison retail centre and there is little prospect of it becoming so. It has a growing number of "bespoke" shops, cafes bars and restaurants attracted by the changing demography in the area over the past ten years.	This point is noted.
648	Gordon Turpin	Highams Park Planning Group	There is considerable potential to relieve deprivation and social problems by remodelling the Aldriche Way Estate. To provide more, better-quality homes.	This point is noted for consideration as part of site-specific proposals for identified areas of change.

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Policy 49: Revitalisation, Adaptation and Regeneration in Designated Centres and Parades				
ID	Full Name	Organisation	Comment	Council (Officers) Response
722	Mr Gordon Turpin		Supportive of residential accommodation on upper levels with separate entrances subject to the provision of proper waste storage and collection facilities.	This point is noted.
748	Mr Gordon Turpin		There is considerable potential to relieve deprivation and social problems by remodelling the Aldriche Way Estate. To provide more, better-quality homes.	This point is noted for consideration as part of site-specific proposals for identified areas of change.
1014	Lauren Laviniere		Policy 50A - A target for the proportion of retail uses within the primary shopping areas should be considered. This would help clarify the implementation of this policy.	The Council considers that a target threshold figure is no longer required. This is mindful of the removal of primary and secondary frontages from the NPPF and the recognition by Government that town centres are changing and are less reliant on significant concentrations of solely Class A1 retail uses to sustain their health.
1083	Ms Alison Blom-Cooper	Planning Department Epping Forest District Council	The Council also welcomes the qualitative improvements sought to provide business space, cultural and retail facilities in the borough, particularly in the Central Area. In addition the policies protecting the growing of food and allotments are welcomed as is the suite of policies in response to climate change.	This point is noted.
1185	Mrs Jean Turpin		There may be scope for some redevelopment in the District Centre where some of the parades on Winchester Road are now looking a bit tired but the overall size of the centre should not be reduced and housing should not be allowed at ground floor level. The existing station building is key to the character and feel of Highams Park and should be retained and not redeveloped; it should be listed.	This point is noted.
1626	Bob Bennet		In the light of continue decline in the demand for retail uses, it is clearly sensible to facilitate a wide range of other uses in shopping centres. The retention of a retail premises will also provide accommodation for start-up businesses, non-retail uses such as cafes etc. For this reason a change of use to housing should not be permitted as once the use is classed as residential, future opportunities for business use will disappear	This point is noted. The policies included in Chapter 11 of the draft plan acknowledge the current challenges facing the retailing industry and seeks to manage change by protecting shops where there are good planning reasons to do so. The policy approach also seeks to encourage adaptation and revitalisation of town centres. It is proposed to include a reference to the role of Article 4 Directions as suggested.

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Policy 49: Revitalisation, Adaptation and Regeneration in Designated Centres and Parades				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			forever. This section of the Local Plan should also include a reference to the Councils Article 4 direction which removes development rights for the change use of B1 offices to residential use. The Article 4 direction is also in conflict with the policies which seek to or encourage residential uses above shops in shopping centres.	However, it is considered that there is no direct conflict with the policy on residential uses above shops. Proposals submitted for planning permission arising from the withdrawal of permitted development rights will be considered on their merits and granted planning permission where justified in accordance with the policy.
1887	Mr Modomo	Modomo HQ	The London Borough of Waltham Forest's Draft Local Plan presents a welcomed acknowledgment of meanwhile use.	This point is noted.
1888	Mr Modomo	Modomo HQ	Draft Policy 43, 45 and 49 in the draft local plan all engage with a range of meanwhile uses and locations, but these are principally concerned with commercial uses.	Meanwhile uses cover a range of temporary uses on land. While the idea of using vacant land and property awaiting longer-term development for housing is supported in principle, it is also recognised that not all vacant land and property will be suitable for housing as meanwhile use, for example in industrial areas where the amenity of residential occupiers must be protected or along designated shopping frontages, where the introduction of residential uses would be inappropriate and could threaten the vitality and viability of the shopping frontage. Subject to these considerations, Policy 49 (D) makes specific reference to meanwhile uses. The emerging London Plan, which is part of Waltham Forest Council's development plan, includes a policy on meanwhile uses covered by Policy H3.
1889	Mr Modomo Modomo	Modomo HQ	There is currently no recognition or mention of residential as a meanwhile use and Modomo request recognition of housing as a potential meanwhile use is included within the New Local Plan.	Meanwhile uses cover a range of temporary uses on land. While the idea of using vacant land and property awaiting longer-term development for housing is supported in principle, it is also recognised that not all vacant land and property will be suitable for housing as meanwhile use, for example in industrial areas where the amenity of residential occupiers must be protected or along designated shopping frontages, where the introduction of residential uses would be inappropriate and could threaten the vitality and viability of the shopping frontage. Subject to these considerations, policy 49 (D) makes

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Policy 49: Revitalisation, Adaptation and Regeneration in Designated Centres and Parades				
ID	Full Name	Organisation	Comment	Council (Officers) Response
				specific reference to meanwhile uses. The emerging London Plan, which is part of Waltham Forest Council's development plan, includes a policy on meanwhile uses covered by Policy H3.

Policy 50: Managing Changes of Use in Primary Shopping Areas				
ID	Full Name	Organisation	Comment	Council (Officers) Response
1015	Lauren Laviniere		Policy 51 - reference to mitigating impacts on amenity and designing units with active, public facing frontages.	This point is covered under Policy 49 (G), where the policy makes reference to "Ensuring that replacement uses are well integrated (in function and design) with the remaining frontage to manage the impact of change on townscape character and neighbouring amenity".
1627	Bob Bennet		It is noted and welcomed that it is not now proposed to define the proportion of retail uses to be maintained in primary and other designated frontages.	The Council notes support for the policy approach set out under Policy 50 regarding the removal of the policy threshold on the proportion of retail uses to be maintained in designated frontages as previously included in the Local Plan.
2672	Lauren Laviniere		Policy 50G is not phrased in the form of criteria.	This point is noted. It is proposed to re-word Policy 50G to refer to the 'availability of suitable alternative vacant properties outside the primary shopping area'.
2673	Lauren Laviniere		Policy 53A - A strategy for the key (major and district) designated centres is welcomed. Who would lead on this and when they will be prepared?	The Council is currently developing a programme for the preparation of town centre strategies. Further information would be published on the website.
2683	Gordon Turpin	Highams Park Planning Group	The primary retail frontage really ought to be contiguous and therefore include Tesco frontage to Larkshall Road. We might also seek to see the other side of the road moving to primary retail as it is developed.	This point is noted for consideration.
2684	Gordon Turpin	Highams Park Planning Group	Policy suggestion could be that development in DCs should seek to link areas of designated prime retail frontage where they are not contiguous.	This point is noted for consideration.

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Policy 50: Managing Changes of Use in Primary Shopping Areas				
ID	Full Name	Organisation	Comment	Council (Officers) Response
2685	Gordon Turpin	Highams Park Planning Group	We agree with a more flexible approach to change of use and in the manner articulated in the Highams Park Plan.	This point is noted.
2686	Gordon Turpin	Highams Park Planning Group	We support residential accommodation on upper levels with separate entrances; subject to the provision of proper waste storage and collection facilities.	This point is noted.
2687	Gordon Turpin	Highams Park Planning Group	We do not support ground floor residential accommodation in Highams Park District Centre; as this is often of poor quality and will fragment the centre and reduce its vibrancy.	This point is noted.
2688	Gordon Turpin	Highams Park Planning Group	We support policy 53 which seeks to protect shops outside of designated centres and parades.	This point is noted.

Policy 51: Managing Changes of Use outside Primary Shopping Areas of Walthamstow Town Centre and the District Centres				
635	Gordon Turpin	Highams Park Planning Group	Supportive of residential accommodation on upper levels with separate entrances subject to the provision of proper waste storage and collection facilities.	Comment has been noted.
723	Mr. Gordon Turpin		Supportive of residential accommodation on upper levels with separate entrances subject to the provision of proper waste storage and collection facilities.	This point is noted.

Policy 52: Managing Changes of Use in Neighbourhood Centres and Local Retail Parades				
ID	Full Name	Organisation	Comment	Council (Officers) Response
827	Freight Transport Association		Only safeguarding retail units with adequate servicing facilities could fundamentally alter the nature of many communities. The borough should instead be looking to support local shops by ensuring they are able to receive deliveries and servicing out of peak hours, including before the early morning peak and into the evening. FTA calls on the London Borough of Waltham Forest to support fundamental reform of the LLCS, including	The need for servicing of retail and other commercial uses including the increasing requirement for home delivery services is recognised. This point is noted in preparing town centre strategies and masterplan proposals addressing sites specific matters.

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Policy 52: Managing Changes of Use in Neighbourhood Centres and Local Retail Parades				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			exempting operators who have moved to quieter and cleaner alternatives and necessary changes to the scheme to enable more deliveries to be retimed.	
1016	Lauren Laviniere		Policy 53 - See comments on Policy 50A (A target for the proportion of retail uses within the primary shopping areas should be considered. This would help clarify the implementation of this policy.) Introducing a proportion of retail uses in Policy 50A might help explain what is meant by balanced provision. Town centre strategies would also clarify the overall objectives and what the Council will be doing to help deliver on the vision. Policy 53A - A strategy for the key (major and district) designated centres is welcomed. Who would lead on this and when they will be prepared?	The Council considers that a target threshold figure is no longer required. This is mindful of the removal of primary and secondary frontages from the NPPF and the recognition by Government that town centres are changing and are less reliant on significant concentrations of solely Class A1 retail uses to sustain their health. It proposed to include additional wording to explain "balanced provision".
1795	Mr Thomas L'Estrange		I am particularly concerned about the level of additional housing proposed. The addition of an extra 450 homes/housing units close to the centre will drastically alter the 'feel' of Higham Park. Whilst I appreciate the need for housing, I do not see that this should be provided in areas where the local schools are already full with no room for further expansion, where parking is already a major problem and doctors' surgeries are already oversubscribed. What also saddens me is that I feel far from certain that the Council will take in to account the views of the Highams Park residents. As a prime example, the local opposition to the Tesco development was ignored when the size of the Section 106 money was realised. I am not aware that any of it was spent in Highams Park.	The Local Plan will be supported by an Infrastructure Delivery Plan, which will set out details of the borough's infrastructure requirements. This document will set out what is needed, where it is needed and when it is needed. This document will be published with the final version of the plan. Policy 2(c) makes clear that planning permission will only be granted for new development if it can be demonstrated that there is, or will be, sufficient infrastructure capacity to support and meet growth requirements.
1871	Miss Susan Murray		We were told last night that we are currently 10 Doctors short in this area as it is. What will happen when thousands more people join us over the next few years? We were told last night that NO GPs or the CCG are interested in our area. So how are you now going to work this? Is it legal to build where there is no	The Local Plan will be supported by an Infrastructure Delivery Plan, which will set out details of the borough's infrastructure requirements. This document will set out what is needed, where it is needed and when it is needed. This document will be published with the final version of the Plan. Policy 2(c) makes clear that planning permission will only be granted for

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Policy 52: Managing Changes of Use in Neighbourhood Centres and Local Retail Parades				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			infrastructure to support new people? Surely there has to be Drs and Dentists per capita legally?	new development if it can be demonstrated that there is, or will be, sufficient infrastructure capacity to support and meet growth requirements.
Policy 53: Evening and Night-time Economy Uses				
ID	Full Name	Organisation	Comment	Council (Officers) Response
633	Gordon Turpin	Highams Park Planning Group	We do not support ground floor residential accommodation in the Highams Park District Centre and support the Policy 53 which protects shops outside the designated centres and parades.	Support of Policy 53 has been noted. Comment will be taken into consideration.
721	Mr. Gordon Turpin		We do not support ground floor residential accommodation in the Highams Park District Centre and support the Policy 53 which protects shops outside the designated centres and parades.	This point is noted.
929	Mr Mathew Frith		We support this, but recommend a specific reference to that there are environmental impacts from light pollution which if close to green spaces, especially those supporting trees, may adversely affect bats and other biodiversity.	This point is noted. In practice all other policies of the Plan are applicable in decision making, in this case including those addressing the issue of light pollution as included under Policy 59 (High Quality Environment), Policy 64 (Amenity) and Policy 66 (Advertisements).
1017	Lauren Laviniere		Policy 54B - It is not clear if all centres benefit from existing shopfront improvement schemes. If they do not, are there guidelines available which every town centre could apply? (whether they are part of the funded shopfront scheme or not)	Further information on shopfront improvement schemes/projects and priority areas will be published subject to the availability of funding opportunities. Priority areas will be established through evidence identified as part of town centre strategies or other regeneration initiatives.
1372	Jennefer Peters	Senior Strategic Planner, London Plan Team Greater London Authority	WF's approach to the evening and night-time economy is positive and is welcomed by the Mayor. Walthamstow is identified in the draft new London Plan in Table A1.1 as having a night time economy of regional or sub-regional significance and this should be reflected or referred to in draft Local Plan policy or supporting text. A strategic approach that would allow for the coordination of night-time transport, licensing policy	The Council notes the statement of support provided regarding Policy 53 of the draft plan. Part A of the policy acknowledges the point made regarding the need for strategic approach. To clarify this point further it is proposed to include suitable wording in the explanatory text to acknowledge the point made about coordination of night-time transport, licensing policy etc to achieve good outcomes.

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Policy 53: Evening and Night-time Economy Uses				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			and other matters to ensure the best possible outcomes for a vibrant and well-functioning night time economy would be welcomed and supported.	
1821	Robert Tatam		Page 117, policy 53 relates to encouraging an Evening and Night-time Economy. I am strongly opposed to the pursuance of this proposal, and consider that expanding the Night-time Economy cannot, in fact, be done without (in your words, Paragraph D) “; significant individual or cumulative adverse impact on surrounding residential areas due to noise, traffic, parking ; disorder and nuisance”.	The policy measures set out under Policy 53 seek to mitigate the adverse impacts of evening and night-time economy uses. In particular, Policy 53 (D) as referenced will be an important consideration in decision making. The policy approach taken also seeks to ensure a coordinated management strategy incorporating licencing policy and other servicing arrangements to control such activity.
1859	Mike Chrimes		There is no holistic view as to how the night-time economy of the borough can be encouraged. Centres at Blackhorse Road and Wood Street have lost premises, and Station Road and South Chingford have lost youth venues without attracting new alternatives. A credible policy within the development plan would be helpful.	The Council is addressing the challenges affecting its town centres in a number of ways such as through the preparation of town centre strategies and other regeneration initiatives. Policy 53 of the draft plan purposely seeks to encourage evening and night-time economy uses.

Policy 54: Shopfronts and Signage				
ID	Full Name	Organisation	Comment	Council (Officers) Response
2019	Peter Drew		Will de-designating frontages mean town centres will become dead areas? Will they become residential or could action be taken to promote other uses	The de-designation of some frontages seeks to create a cohesive retail base at the most appropriate locations in the designated centres. Currently there is a proliferation of commercial activities stretching in long lengths along road some road corridors. Mindful of the economic downturn, the growth in internet shopping, changed shopping habits and the continued influence of out-of-centre shopping, it is necessary to manage retail change. In those frontages proposed for de-designation, Policies 50 and 51 will apply to ensure that the most appropriate uses are encouraged. Along commercial frontages single residential uses would generally be inappropriate unless they are part of a comprehensive

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Policy 54: Shopfronts and Signage				
ID	Full Name	Organisation	Comment	Council (Officers) Response
				residential conversions scheme. In support of this policy approach, policy 49 seeks to ensure that replacement uses are well integrated (in function and design) with the remaining frontage to manage the impact of change on townscape character and neighbouring amenity.

Chapter 12: Social and Community Infrastructure

Policy 55: Social and Community Infrastructure				
ID	Full Name	Organisation	Comment	Council (Officers) Response
167	Anthony Thorne		Before any plans for construction take place it will be necessary to assess what of the existing infrastructure has sufficient spare capacity and what additional demand will be placed on it plus the provision of extra capacity	The Local Plan will be supported by an Infrastructure Delivery Plan (IDP). The IDP will set out current infrastructure capacity alongside the new infrastructure needs arising from the growth set out in the Local Plan.
168	Anthony Thorne		The Council has in the past been unable to plan for school places even though from its records it should be well aware of the number of infant school places 5 years before the requirement, 8 years for junior and 11 years for secondary	The Council is both the Local Planning Authority and the Local Education Authority. The Council has a dedicated team responsible for planning school places. Live birth data is received from ONS each year and a sophisticated model has been designed to analyse demand for places in the future. Each year, a return is made to the Department for Education (DfE) by way of a SCAP (Schools Capacity) Return, which forecasts the need for school places for the next five years. The forecasts for Waltham Forest have historically been very accurate. To say, however, that the Council should be well aware of needs arising five, eight or in some instances 11 years in advance, is not accurate as a range of external factors can affect the accuracy of forecasts such as a change in international, national or internal migration, housing benefit changes, and affordability to live in the area.

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Policy 55: Social and Community Infrastructure				
ID	Full Name	Organisation	Comment	Council (Officers) Response
176	Anthony Thorne		The current building programme has increased demand on already overstretched resources. It therefore needs a plan to provide more facilities along with better transport links to the hospitals and again this has a significant lead time plus a demand for land.	The Local Plan will be supported by an Infrastructure Delivery Plan (IDP). The IDP will set out infrastructure needs arising from the growth set out in the Local Plan, including but not limited to land that may be required in the future to support infrastructure delivery.
177	Anthony Thorne		Again this is the same problem as with hospitals with increased demand without increased provision of service and facilities and again this will require premises with good transport links.	The Local Plan will be supported by an Infrastructure Delivery Plan (IDP). The IDP will set out infrastructure needs arising from the growth set out in the Local Plan.
178	Anthony Thorne		This has already been mentioned but there needs to be consideration about access, public and private transport for schools where pupils come from a wider geographical area.	School catchment areas and subsequent travels times are taken into account when undertaking school place planning.
188	Mrs Christine Straub		We do not have the infrastructure to cater for a large influx of additional residents. We already have to wait over 2 weeks for a doctors appointment never seeing the same doctor twice.	The Local Plan will be supported by an Infrastructure Delivery Plan (IDP). The IDP will set out infrastructure needs arising from the growth set out in the Local Plan.
190	Mrs Christine Straub		The schools are already heavily over subscribed.	There is a limit to the number of places offered by any individual school. More popular schools will receive more applications than they can supply. It is the role of the Local Education Authority to ensure that, borough wide, there are sufficient local school places to meet the demand for all pupils with a planned surplus of 5% to allow for migration into the borough within the academic year.
209	Carrie Deane		As a resident my concerns are transport, GP surgeries places and play areas for children indoor and outdoor school places.	The Local Plan will be supported by an Infrastructure Delivery Plan (IDP). The IDP will set out infrastructure needs arising from the growth set out in the Local Plan.
210	Carrie Deane		More flats not enough family homes	Noted for consideration.
279	Paul Burden		I am concerned that promised GP units will be delivered.	Alongside changes to the way Waltham Forest Council is working with local health stakeholders to help facilitate the delivery or new provision, Government has made a number of legislative changes with the aim of making delivery of infrastructure easier at the local level. These include:

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				<ul style="list-style-type: none"> - removal of pooling restrictions on S106 agreements, meaning that more than five individual S106 can be pooled to deliver a particular project; - CIL and S106 can now be spent on the same infrastructure project, whereas previously this was not permitted. <p>The Council supports these changes and believes it will support the timely delivery, including making it easier to forward fund, if necessary.</p>
289	Daf Bergin		Where will the children go to school?	The Local Plan will be supported by an Infrastructure Delivery Plan (IDP). The IDP will set out infrastructure needs arising from the growth set out in the Local Plan, including but not limited to school place provision.
290	Daf Bergin		Hospital spaces?	<p>The Council believes the redevelopment of Whipps Cross is a once in a lifetime opportunity to build a new hospital and a unique chance to be at the forefront of national efforts to transform how care is provided for local people as set out in the NHS Long Term Plan. The vision is for a new hospital within a wider health and wellbeing setting, alongside much needed new homes and other facilities to benefit the community. A brand-new hospital will provide the same core services as today, including A&E and maternity. In looking at the capacity a new hospital will need, the Trust are taking into account population growth projections but also new models of care delivery that provide faster access to diagnostics and more same day care which, alongside planned improvements in primary and community care, will mean fewer unnecessary stays in hospital. This work is informing the development of a Strategic Outline Case (SOC) for the Whipps Cross redevelopment, which is the next key stage in the process. Regarding patient transport, the Trust's current policy and guidelines can be found at www.bartshealth.nhs.uk/transport.</p>

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ID	Full Name	Organisation	Comment	Council (Officers) Response
				If you would like to escalate issues with transport directly with Barts Health Trust, you can contact bhnt.centralcomplaints@nhs.net with your name and details of your concerns.
378	Mr Ashley Uglow		Opportunity needs to come before housing. There are too many homeless and unemployed already caused by our crushed city. vast amounts of England are much more available to solve these issues. how can you ask anyone to support a policy of providing the minimum provision. Much improvement and development is needed in educational services to solve our societies issues. Targets should be much more stretching in this area.	Noted for consideration.
442	Mr Jeremy Clayden		Waltham Forest has finite resources in terms of hospitals, doctor's surgeries, schools, school counselling services and children's mental health services to name but a few. These services are already stretched beyond maximum capacity. One example of this is that the waiting list for an assessment by CAMHS in Waltham Forest is over a year. Another example is the following account of one time I took my son to the hospital - it is typical of our experience of the hospital. My son had a foot injury and was in a lot of pain. I took him to A&E at Whipps Cross Hospital by car. When we got to the hospital there were no free spaces at the A&E car park. I couldn't drop my son off in A&E because he is too young to be left by himself. We drove around the hospital several times looking in all the car parks to find a space. There were cars waiting for spaces blocking up the roads. In the end, because there were no free spaces in the hospital car parks, we had to park outside the grounds of the hospital in an unofficial location. I left my son locked in the car and walk to the hospital in order to borrow a wheelchair for my son. I returned with a wheelchair and wheeled my son to A&E. On arrival at A&E there was a long queue at reception. We	The Local Plan will be supported by an Infrastructure Delivery Plan (IDP). The IDP will set out infrastructure needs arising from the growth set out in the Local Plan. The Council believes the redevelopment of Whipps Cross is a once in a lifetime opportunity to build a new hospital and a unique chance to be at the forefront of national efforts to transform how care is provided for local people as set out in the NHS Long Term Plan. The vision is for a new hospital within a wider health and wellbeing setting, alongside much needed new homes and other facilities to benefit the community. A brand-new hospital will provide the same core services as today, including A&E and maternity. In looking at the capacity a new hospital will need, the Trust are taking into account population growth projections but also new models of care delivery that provide faster access to diagnostics and more same day care which, alongside planned improvements in primary and community care, will mean less unnecessary stays in hospital. This work is informing the development of a Strategic Outline Case (SOC) for the Whipps Cross redevelopment, which is the next key stage in the process.

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Policy 55: Social and Community Infrastructure				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			waited 45 mins in the queue to see the receptionist and then joined another waiting system to see a second receptionist. After talking to the second receptionist we were sent through to the pediatric waiting room. In this small waiting room there were no seats free so I sat on the floor in the corridor by the toilets whilst my son sat in the wheelchair. We spent the whole day (6 hours) at the hospital in order to get my sons foot x rayed. I can't see that Whipps Cross Hospital has the resources to cope with the current population of Waltham Forest let alone the projected increase in population as a result of the housing developments in the Council's Local Plan. I understand that there are plans to redevelop the hospital and make it 'state of the art'. Being 'state of the art' is one aspect of the problem but the Council doesn't seem to recognise that the hospital also needs to increase its capacity to be able to deal with the demand from the borough's current population. There also has to be provision for people in the borough to get to the hospital in an emergency (for many types of injuries requiring A&E an ambulance won't come out, they say the person must make their own way to A&E). There is nothing specific in the plan about how people can get to the hospital in an emergency. Any redevelopment of the hospital will take years and this must be done in advance of any increase in demand on the hospital.	
456	Mrs Krysia Sivyer		North Chingford would benefit from a Community Centre. The Assembly Hall is very underused because it is too expensive to use. The ground level of new build flats could incorporate community areas.	Noted for consideration.
515	Mrs Claire Ford		Yes.	Noted.

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Policy 55: Social and Community Infrastructure				
ID	Full Name	Organisation	Comment	Council (Officers) Response
520	Mrs Claire Ford		Do not agree with the criteria listed below. Should maintain current facilities and improve them ie community halls, hubs, buildings where the community can meet. and build additional facilities alongside these or in new areas. 'Proposals involving the loss of existing social or community infrastructure will not be permitted unless one or more of the following criteria are met: A replacement facility of equivalent or better quality that meets the demonstrable needs currently met by the existing facility is provided It can be demonstrated that adequate alternative facilities which meet the needs currently being met by the existing facility are within walking distance, without leading to a shortfall in provision for the specific type of social or community infrastructure in the area It can be demonstrated that the facility is no longer required in its current use and cannot viably accommodate other current forms of social or community infrastructure.'	Not all current community facilities are in a good state of repair, offer a wide range of activity or are in the most accessible locations. Older buildings can also be less environmentally friendly, with higher running costs, which either have to be funded by Waltham Forest Council or the community that is using them. This policy seeks to respond to opportunities to improve and expand the provision of community facilities, whilst resisting/blocking unmitigated loss. The Council would not wish to protect all existing facilities in situ, whilst delivering new facilities alongside. In most instances, it will be more economically viable and sustainable in the longer term to have new purpose-built facilities re-provided either on the site in question or on a nearby site, still within easy access of the community it serves.
541	Ms Ruth Mattison		Increasing the number of households in North Chingford will severely damage the delicate infrastructure in the area. Schools are already very oversubscribed at the moment. What is your estimation of the additional school places required by your proposals? What is your estimation of the additional GP numbers and other medical services required by your proposals? Current transport links cannot cope with the current population, how will it cope with the additional numbers?	The Local Plan will be supported by an Infrastructure Delivery Plan (IDP). The IDP will detail the infrastructure needs arising from the growth set out in the Local Plan, including but not limited to school place provision, GP provision and transport improvements.
551	Wendy Holloway		Concerned that many schools are having to build on their land to take extra pupils. More schools are required instead. Also teenage schoolchildren should not have free bus passes and be in walking distance of school. This also addresses issue re elderly residents being afraid to use buses at school leaving time.	Not all schools are controlled by the Local Authority. Free Schools and Academies can expand at their own discretion. Local Authorities can no longer build new schools and are restricted to expansions only.

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Policy 55: Social and Community Infrastructure				
ID	Full Name	Organisation	Comment	Council (Officers) Response
563	Mrs Barbara Chapman		The infrastructure of the area, especially doctors, schools, and transport, cannot possibly sustain these proposals.	The Local Plan will be supported by an Infrastructure Delivery Plan (IDP). The IDP will detail the infrastructure needs arising from the growth set out in the Local Plan, including but not limited to school place provision, GP provision and transport improvements.
569	Mr David Smith		Hale End Library - this beautiful building and public area does not deserve to be bulldozed, please leave it be.	Comment noted.
574	Mr David Smith		Recent developments in Highams Park have left a significant impact on infrastructure, not excluding train services, doctor appointments, road traffic, and of course schooling, where a certain local school STILL have classes consisting of over 30 pupils. I feel a minimum of 450 additional homes is way too high, and will change the character of the area significantly, as well as bringing the town to a halt, as infrastructure is already at break point.	Noted. The Local Plan will be supported by an Infrastructure Delivery Plan (IDP). The IDP will detail the infrastructure needs arising from the growth set out in the Local Plan, including but not limited to school place provision, GP provision and transport improvements.
591	Mrs Sheree Mear		I do not support redevelopment of the Highams Park Overground station building or the car park/access road to the station adjacent to The Avenue. The station is pivotal to the village nature of Highams Park. Hale End Library must also be retained and protected. Shops should not be allowed to have ground floor residential accommodation with respect to any change of use applications. And the development of James Yard should be conditional on single level access from the station to Larkshall Road adjacent to the level crossing.	Comment noted.
600	Anthony Thorne		Again we have a provision which always appears to be trying to catch up with demand and again this is something that should be predictable with a reasonable degree of accuracy (see above) the requirement for school place and it then becomes a surprise to the Council that they have not got the facilities etc. Again I would suggest that increasing demand on an over stretched resource without a proper analysis of demand is a	The Local Plan will be accompanied by an up-to-date Infrastructure Delivery Plan when it is published for consultation in 2020. The IDP will outline the need for schools and health services and how such needed will be met through development.

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Policy 55: Social and Community Infrastructure				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			recipe for disaster plus intensifying the existing resource will increase antisocial and violent behaviour.	
601	Anthony Thorne		We have seen the stresses that the emergency services have been put under in recent years with the increases in demands being placed on them with ambulances having to travel vast distances as vehicles are stationary at hospitals waiting for patients to be admitted being a prime example of lack of coordination in planning. The consolidation of police resources in the borough means that there is increases in vehicle movements in specific areas However, no expansion of physical working facilities for the officers combined with an increased demand which would in part I would suggest is due to high density living conditions.	This comment is noted. The Local Plan will be accompanied by an up-to-date Infrastructure Delivery Plan when it is published for consultation in 2020. The IDP will outline the need for schools and health services and how such needed will be met through development.
602	Anthony Thorne		Also with the high density living conditions we have seen the Fire Service being stretched and in need specialist equipment in local areas but this being located in a central location but unable to reach the required location in a reasonable due to the road restrictions etc.	This comment has been noted for consideration.
746	Christine Sandford		We need meeting rooms /community engagement and consultation places which have disabled parking really close by.	The Local Plan will be supported by an Infrastructure Delivery Plan (IDP). The IDP will detail the infrastructure needs arising from the growth set out in the Local Plan, including but not limited to the provision of community facilities.
1005	Martin Levin		"Shaping the Borough" proposals I have long advocated "Ratio Accounting" as a formula whereby a streamlining of over-manning can be countered by restricting "management" to ONE person looking after SEVEN productive workers. Seven is a "magic number", (a local vicar informed me). Applying this to HOUSING: where "x" numbers of dwellings are proposed, there needs to be a PROPORTION of services (Schools, Hospitals, Fire Stations, Doctors). I see no mention of these SUPPORT SERVICES in the PLAN that is proposed.	The Local Plan will be supported by an Infrastructure Delivery Plan (IDP). The IDP will detail the infrastructure needs arising from the growth set out in the Local Plan, including but not limited to the provision of community facilities.

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ID	Full Name	Organisation	Comment	Council (Officers) Response
1189	Mrs Jean Turpin		I should also like to see included in the Local Plan more detail about how the Library and Regal buildings and the station car park can be used as axes to enhance and support the already thriving arts culture within the local community.	This comment is noted and will be reviewed as part of the preparation of the Site Allocations DPD and evidence base work Waltham Forest Council is undertaking, for example the Employment Land Audit.
1196	Rachel Kercani		If you knock down the library I hope you will relocate it somewhere within Highams Park as it is much loved and used.	The plan does not contain any proposals to demolish the Highams Park library. Policies in the plan seek to protect social infrastructure including libraries.
1197	Rachel Kercani		If you knock down the library I hope you will relocate it somewhere within Highams Park as it is much loved and used.	The draft Plan does not include a policy or proposal to demolish the Highams Park Library. Chapters 10 and 12 in the plan seek to protect and promote existing social infrastructure, including libraries.
1374	Jennefer Peters	Senior Strategic Planner, London Plan Team Greater London Authority	Social and community infrastructure should also be directed towards the borough's town centres in accordance with Policies SD6 and S1 of the draft new London Plan. In addition, boroughs should ensure that social infrastructure is planned for and informed by a needs assessment and local evidence enabling the borough to plan for new schools, health facilities and other types of social infrastructure when and where it is most needed.	Comments noted. The Local Plan will be supported by an Infrastructure Delivery Plan (IDP). The IDP will detail the infrastructure needs arising from the growth set out in the Local Plan, including but not limited to the provision of community facilities.
1523	Ms Mary Manuel		We welcome the strategic objective "Ensure timely, strategic and local infrastructure investment and delivery to support good sustainable growth for communities both now and in the future, through working with partners, investors, developers and providers."	Comment noted.
1524	Ms Mary Manuel		New development will be expected required to contribute to the provision of additional social infrastructure to accommodate the impact of new development upon existing social and community infrastructure provision." This strengthened wording will help ensure that the necessary social infrastructure is provided. We note the draft plan includes more detailed policies and supporting text regarding delivering new school places and the use of developer contributions and	Comments noted.

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ID	Full Name	Organisation	Comment	Council (Officers) Response
			suggest this should also apply to health infrastructure. We ask that reference to the NHS Healthy Urban Development Unit's (HUDU) Planning Obligations Model is included to provide evidence for developer contributions (S106) and the use of the Council's Community Infrastructure Levy.	
1547	Mark Furnish	Sport England	Policy 56 aligns with 'enhance' and 'provide' Sport England Planning Policy Principles although these improvements and new provision should be informed by borough wide sport facility strategies, such as the emerging Playing Pitch Strategy. At this stage it is not confirmed what the Playing Pitch Strategy is recommending so it is not known fully what needs enhancing and providing. However, there is likely to be elements of new or improved provision given the extent of growth being planned for within the borough.	Comments noted. The Playing Pitches Strategy has been prepared and has been used to inform the Draft Plan and supporting Infrastructure Delivery Plan (IDP).
1548	Mark Furnish	Sport England	Policy 56 F, however, does raise some concern as sports facilities adjacent, or beneath, residential units do sometimes cause conflicts if not appropriately mitigated and/or managed, whether it be from noise, ball strike or another factor. This could result in sports facilities having to limit its operating hours which would not only cast doubt on the long-term sustainability of a facility but also deprive communities of accessing sport facilities during the peak period for community sport participation. Proposals, therefore, need to be carefully considered. In light of this Sport England recommends that Policy 56 F is changed to "The incorporation of community facilities into mixed use residential schemes where it meets an identified need will be supported where appropriate and would not affect the effective operation of the community facility."	Comments noted. The Council agrees with the suggested amended wording and will incorporate into the Draft Plan.
1549	Mark Furnish	Sport England	Sport England welcome that supporting Paragraph 14.10 refers to communities using school and college sports facilities. Sport England has a free online resource called Use Our School that offers further guidance and information for local authorities	Comments noted. A link to the referenced Sport England document will be included in the Plan and/or supporting Infrastructure Delivery Plan.

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			and other education providers on how to make the best use of school facilities for the benefit of the local community. It is especially useful for those who have responsibility within a school for establishing, sustaining and growing community activity on school sites. Sport England recommends that the Draft Local Plan contains links to Use Our School either in Paragraph 14.10 or Policy 58 where it discusses maximising community use and shared use with sports providers. Use Our School can be accessed at www.sportengland.org/useourschool	
1560	Mr Tim Madelin	Associate Director of Estates (Strategic) NHS North East London Commissioning Alliance	We welcome the strategic objective “Ensure timely, strategic and local infrastructure investment and delivery to support good sustainable growth for communities both now and in the future, through working with partners, investors, developers and providers.”	Comment noted.
1561	Mr Tim Madelin	Associate Director of Estates (Strategic) NHS North East London Commissioning Alliance	We consider that Policy 55 Social and Community Infrastructure clause G should be strengthened as set out below “G. New development will be expected required to contribute to the provision of additional social infrastructure to Accommodate the impact of new development upon existing social and community infrastructure provision. This strengthened wording will help ensure that the necessary social infrastructure is provided. We note the draft plan includes more detailed policies and supporting text regarding delivering new school places and the use of developer contributions and suggest this should also apply to health infrastructure. We ask that reference to the NHS Healthy Urban Development Unit’s (HUDU) Planning Obligations Model is included to provide evidence for developer contributions (S106) and the use of the Council’s Community Infrastructure Levy.	Noted for consideration.

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Policy 55: Social and Community Infrastructure				
ID	Full Name	Organisation	Comment	Council (Officers) Response
1654	Emily Grant		There's little space and too much demand here already. There's little green space, parking, few hospitals, GPs, dentists, and schools. All of these are so strained with cuts and high numbers of people! I have family who work in a local school (and close family friends), and I see the stress is affecting their mental health which leads to general health, which affects my mental health more as I do not like to see them stressed, upset and ill.	Noted for consideration.
1696	Jennifer Herring		I have also heard rumour that the site of the Highams Park library is a potential site for new home creation. This simply cannot be allowed to happen, for obvious reasons! The library must be protected.	Comment noted.
2078	Mike Sparrow		I would also point out that alongside all of this new home building that you mention, there is NO mention of new schools, extra policing, extra space at our local hospital Whipps Cross and extra new GP and/or dental services. So with all this new housing you envisage for this area, all of the existing services will be put under much greater strain, not to mention many local residents who will feel pressurised from increased or 'enhanced' as you put it, numbers of new residents. You will be aware that Whipps Cross has initial plans that show a reduced capacity in its' new/re-build.	Comment noted. Policy 2 of the Local Plan acknowledges the need to provide supporting infrastructure including physical, social and green infrastructure provision commensurate with the scale of growth. The policy goes on to state that planning permission will only be granted for new development if it can be demonstrated that there is, or will be, sufficient infrastructure capacity to support and meet growth requirements.
2141	anonymous response form 1		Support for local organisations to thrive, especially for those that help vulnerable and not have their grants taken away.	Comment noted.
2283	Christine Guy		There is a great deal of uncertainty about any council plans that may be made in the North Chingford area. There have been concerns about the future of Assembly Hall- it was once the hub of all local community activities- until some years ago there was a decision to 'refurbish' the building. There was discussion about adding an extra storey to accommodate educational classes. A lot of public money spent, it was not feasible and in the meantime Friday Hill House was given to	Comment noted.

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			housing. Drama, music and community meetings etc can no afford the Assembly Hall. Thankfully, the local churches have been able to accommodate many community needs, I feel the Council need to review how to put the Hall back into community use	
2301	Mr Tim Madelin	Associate Director of Estates (Strategic) NHS North East London Commissioning Alliance	We welcome the strategic objective "Ensure timely, strategic and local infrastructure investment and delivery to support good sustainable growth for communities both now and in the future, through working with partners, investors, developers and providers."	Comment noted.
2315	Mr Tim Madelin	Associate Director of Estates (Strategic) NHS North East London Commissioning Alliance	"New development will be expected required to contribute to the provision of additional social infrastructure to accommodate the impact of new development upon existing social and community infrastructure provision." This strengthened wording will help ensure that the necessary social infrastructure is provided. We note the draft plan includes more detailed policies and supporting text regarding delivering new school places and the use of developer contributions and suggest this should also apply to health infrastructure. We ask that reference to the NHS Healthy Urban Development Unit's (HUDU) Planning Obligations Model is included to provide evidence for developer contributions (S106) and the use of the Council's Community Infrastructure Levy.	Noted for consideration.
2385	Mike Chrimes		The educational offering, particularly for those who have left school is poor, with the loss of adult education opportunities. Chingford is an attractive destination and thought could perhaps be given to looking at having more training opportunities and broader opportunities in the north of the borough. Nothing is said about problems with academisation at	Noted for consideration.

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ID	Full Name	Organisation	Comment	Council (Officers) Response
			Longshawe and Chingford Hall, availability of primary school places in the south of area, and the desirability of fee paying schools affecting residential inflow.	
2416	Mr Roger Brown	Chair Love North Chingford	Assembly Hall and Library: Reduction of any community use there is universally rejected in North Chingford. Some sensitive improvement and re development in nearby sites is probably welcome. The library is omitted from the plan policy and should be reinstated. The Council should work with the community over this sensitive site to achieve support and enhance its function.	Comment noted.
2419	Helen Hunte	The Mill	We support the aims outlined in the Draft Local Plan documents but want to emphasis the need to priorities shared community space to accommodate the growing and increasingly diverse population of the St James Quarter. We believe The Mill can help you deliver policy 56- Social and Community Infrastructure as well as contributing to many of the strategic objective for Waltham Forest 2035 objectives (2-7, 9, 10 and 12)	The Local Plan will be supported by an Infrastructure Delivery Plan (IDP). The IDP will detail the infrastructure needs arising from the growth set out in the Local Plan, including but not limited to the provision of community facilities.
2441	Mrs Janet McArthy		The provision of new schools or health facilities is not made clear in the plan and when I asked a council officer at the library display, he implied that this would be for the developers to propose within their schemes. But the council should be ensuring providing these alongside the housing and some in advance to meet the needs of the recent new residents. No extra provision has been made in the recent developments. This has led to increased demand in both areas, with a negative impact on existing residents. This would be of paramount importance if new housing is built, as well as retention of a proper council-run library. If the new properties are being built in the centre of Highams Park because of the good transport links, and the hope that people will not use cars so much, if at all, why has there been no support whatsoever for redirection of the W16 bus to access Whipps Cross Hospital, despite	Noted. The Infrastructure Delivery Plan is being published ahead of the next consultation of the Local Plan. This is scheduled for Autumn 2020.

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Policy 55: Social and Community Infrastructure				
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			considerable new housing with little car parking? This would be a relatively easy thing to arrange and yet I have been to many meetings with the council and transport providers and it has not been seriously looked at. To access the only local hospital at Whipps Cross, people in Highams Park have a very difficult journey. My husband has major health problems and has had to attend many appointments there and we drive, as there is no other reasonable way for him to get there that he can manage, and yet we use buses and trains for many of our journeys, in fact, whenever possible.	
2634	Ms Kate Bundock		Health centres should be supported and made places of welcome and people with mental health or social problems will use them. For all ages with the right encouragement. Face the fact that there is unrest among the teenagers leading to stabbings and petty crime. Ask why and act on measures to reduce incidents, provide facilities as a diversion and places of safety.	The Council recognises the importance of Health Centres in the borough to support the health and well-being of Waltham Forest residents. The Council will continue to work with the NHS, community groups and organisations to ensure the improvement and enhancement of existing and the provision of new healthcare facilities in the borough.
2638	Mrs Barbara Chapman		The infrastructure of the area , especially doctors, schools, and transport, cannot possibly sustain these proposals.	With the population projected to grow in Waltham Forest, the Council acknowledges the need to increase the provision of both social and physical infrastructure. This comment is noted in preparing of the Infrastructure Delivery Plan that will assess and the existing and future need for infrastructures such as Doctor and GP surgeries, early years, primary and secondary school facilities in the borough. The Council will continue to work closely with TfL and Greater Anglia in improving the existing transport network to ensure the transport needs of the future population can be met.
2883	Mrs Antonia Fernand		No, I really query the plan for increased high density living. Generally there doesn't seem to be proper planning for schools and doctors etc. The borough is planning and designing high density housing. Walthamstow already feels over crowded yet the borough is planning to increase this. My teenagers can't	The Local Plan will be supported by an Infrastructure Delivery Plan (IDP). The IDP will set out infrastructure needs arising from the growth set out in the Local Plan, including but not limited to, school place provision and healthcare needs. The plan does not say there is no capacity to build more schools. However, it

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Policy 55: Social and Community Infrastructure				
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			wait to grow up and leave Walthamstow because of it. The plans mention there is not capacity to build more schools. How will it reconcile the ensuing problems of nurseries and schools etc? Working parents already find it very difficult and often stressful to get their child to a nursery and in to work on time and very often there is not a nursery available near them. There is a knock on effect on the child's well-being with longer days at daycare, getting up earlier to get there on time, seeing less of their parents etc.	seeks to ensure that where new development places additional demand on local infrastructure that the development makes an appropriate contribution to support its delivery, whether that be financial or non-financial contribution e.g. provision of buildings or facilities. With regard to the provision of new schools and nursery facilities, the needs arising from the proposed spatial strategy contained in the Local Plan will be set out in the supporting Infrastructure Delivery Plan (IDP).
2886	Mrs Janet McArthy		The provision of new schools or health facilities is not made clear in the plan and when I asked a council officer at the library display, he implied that this would be for the developers to propose within their schemes. But the council should be ensuring providing these alongside the housing and some in advance to meet the needs of the recent new residents. No extra provision has been made in the recent developments. This has led to increased demand in both areas, with a negative impact on existing residents. This would be of paramount importance if new housing is built, as well as retention of a proper council-run library.	The Local Plan will be supported by an Infrastructure Delivery Plan (IDP). The IDP will detail the infrastructure needs arising from the growth set out in the Local Plan, including but not limited to the provision of school places, health facilities and community facilities. The Council, in turn, requires contributions from developers, by way of Community Infrastructure Levy, Section 106 planning obligations and/or direct delivery on-site, ensuring new facilities are at the heart of the communities they are intended to serve. With regard to utilities provision, traditionally this has predominantly been the responsibility of the developer to secure in negotiation with the respective utility provider. The Council recognises, however, the potential benefits, both in terms of cost and minimising the level of nuisance that can be caused by individual utility providers, serving individual developments delivering their works in isolation, particularly in terms of disrupting the local road network. The Council is therefore considering what role planning policy could have in facilitating the coordinated delivery of local utilities.
2908	Barts Health NHS Trust		Delivers a health and well-being centre including a General Practitioners' centre in partnership CCG Whilst Barts supports this aspiration, particularly given the crucial role that general practitioners perform in intercepting unnecessary visits to the	This comment is noted for consideration.

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			<p>Emergency Department (thus enabling the ED to provide a better service to those in need), this proposed requirement is beyond the control of the landowner because the landowner is not a primary care commissioner. It may also be the case that there is not a need for new primary care facilities in this location when the site is redeveloped. Furthermore, it is unclear how the Council envisages that such a facility will be funded. Whilst Barts is committed to working collaboratively with NHS commissioning and healthcare delivery partners, the policy (or where relevant its supporting text) should make clear that: (i) the provision of such a facility will be dependent on the commissioning body demonstrating a clear need for such and there being a commitment to occupy space on the site for primary care services; and (ii) where a facility is required to meet housing growth, a commensurate Community Infrastructure Levy ('CIL') contribution will be made available for the delivery of the facility (having regard to both land and construction costs).</p>	

Policy 56: Loss of Existing Social or Community Infrastructure				
ID	Full Name	Organisation	Comment	Council (Officers) Response
1550	Mark Furnish	Sport England	<p>Sport England object to the wording of Policy 57 as it does not entirely align with Sport England or National Policy. Sport Facilities, including playing fields and ancillary buildings, should only be lost if identified as surplus in borough wide strategic documents, such as the emerging Playing Pitch Strategy, or the facilities are replaced with a facility of, at least, equivalent quantity and quality and in a suitable location. In this context Policy 57 B ii should be amended to not apply to sport facilities and B i should be amended to include quantity and accessibility.</p>	Noted for consideration.

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Policy 56: Loss of Existing Social or Community Infrastructure				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			Alternatively, the Council could consider a clear policy/policies that specifically addresses indoor and outdoor sports facilities (although Policy 86 could be that policy in relation to outdoor facilities) as this would then ensure that the specific nuances of sport facility provision is addressed and that the Draft Local Plan is in line with national planning policy, i.e. Paragraph 96 and 97 of the NPPF.	
1551	Mark Furnish	Sport England	Sport England also strongly advises that Paragraph 14.11 makes reference that a surplus must be identified before a sports facility could be considered be lost. In addition, facilities for other sports or other forms of activity and recreation should be considered before a particular facility is lost.	Noted for consideration.
1655	Emily Grant		There's little space and too much demand here already. There's little green space, parking, few hospitals, GPs, dentists, and schools. All of these are so strained with cuts and high numbers of people! I have family who work in a local school (and close family friends), and I see the stress is affecting their mental health which leads to general health, which affects my mental health more as I do not like to see them stressed, upset and ill.	Comments noted. The Local Plan will be supported by an Infrastructure Delivery Plan (IDP). The IDP will detail the infrastructure needs arising from the growth set out in the Local Plan, including but not limited to the provision of community facilities, health facilities and school places.
2632	Ms Kate Bundock		Over the years facilities for the elderly have closed and not been rebuilt or replaced, such as day centres. So much for their well-being!	As Waltham Forest's population is set to grow, Waltham Forest Council recognises the need to protect, enhance and provide new care facilities for elderly residents of Waltham Forest. Policy 55 Social and Community Infrastructure will ensure the delivery of new or improved social and community infrastructure such as care homes in the borough to meet future projected need.

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Policy 57: Education and Childcare Facilities				
ID	Full Name	Organisation	Comment	Council (Officers) Response
899	Lauren Keeling	Planning Officer Essex County Council	ECC recommend that the LBWF engage to ensure that there is adequate Early Years and Child Care provision to meet future living and working communities given potential cross boundary service provision.	Comment noted.
1794	Mr Thomas L'Estrange		I am particularly concerned about the level of additional housing proposed. The addition of an extra 450 homes/housing units close to the centre will drastically alter the 'feel' of Higham Park. Whilst I appreciate the need for housing, I do not see that this should be provided in areas where the local schools are already full with no room for further expansion, where parking is already a major problem and doctors' surgeries are already oversubscribed. What also saddens me is that I feel far from certain that the Council will take in to account the views of the Highams Park residents. As a prime example, the local opposition to the Tesco development was ignored when the size of the Section 106 money was realised. I am not aware that any of it was spent in Highams Park.	The Local Plan will be supported by an Infrastructure Delivery Plan (IDP). The IDP will detail the infrastructure needs arising from the growth set out in the Local Plan, including but not limited to the provision of community facilities.
1798	Deborah Taylor		An additional 450 homes within half a mile of Highams Park station is far too many. Development on this scale would irreparably damage the character of the area, to a say nothing of the pressure on local schools, GP surgeries and the roads which are already heavily congested at peak times.	The Local Plan will be supported by an Infrastructure Delivery Plan (IDP). The IDP will detail the infrastructure needs arising from the growth set out in the Local Plan, including but not limited to the provision of community facilities, health facilities and school places.
1861	Mike Chrimes		Similarly the potential for higher education to attract other types of businesses into the borough is not discussed. The most obvious centre would be Whipps Cross Teaching Hospital but a more ambitious background paper could be drafted to take advantage of the Forest Road campus	Comment noted.
1942	Tony Thorne		Again we have a provision which always appears to be trying to catch up with demand and again this is something that should be predictable with a reasonable degree of accuracy (see above) the requirement for school place and it then becomes a surprise to the Council that they have not got the facilities etc.	The Local Plan will be supported by an Infrastructure Delivery Plan (IDP). The IDP will detail the infrastructure needs arising from the growth set out in the Local Plan, including but not limited to the provision of community facilities, health facilities and school places.

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ID	Full Name	Organisation	Comment	Council (Officers) Response
			Again I would suggest that increasing demand on an over stretched resource without a proper analysis of demand is a recipe for disaster plus intensifying the existing resource will increase anti social and violent behaviour.	
2272	Phoebe Juggins	Department for Education	The Department for Education (DfE) welcomes the opportunity to contribute to the development of planning policy at the local level. Under the provisions of the Education Act 2011 and the Academies Act 2010, all new state schools are now academies/free schools and DfE is the delivery body for many of these, rather than local education authorities. However, local education authorities still retain the statutory responsibility to ensure sufficient school places, including those at sixth form, and have a key role in securing contributions from development to new education infrastructure. In this context, we aim to work closely with local authority education departments and planning authorities to meet the demand for new school places and new schools. We have published guidance on education provision in garden communities and securing developer contributions for education, at https://www.gov.uk/government/publications/delivering-schools-to-support-housing-growth . You will also be aware of the corresponding additions to Planning Practice Guidance on planning obligations, viability and safe and healthy communities.	Noted for consideration.
2274			The National Planning Policy Framework (NPPF) advises that local planning authorities (LPAs) should take a proactive, positive and collaborative approach to ensuring that a sufficient choice of school places is available to meet the needs of communities and that LPAs should give great weight to the need to create, expand or alter schools to widen choice in education (para 94). We welcome the reference to this at Paragraph 12.12 of the consultation document. DfE supports	Noted for consideration.

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Policy 57: Education and Childcare Facilities				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			<p>the principle of London Borough of Waltham Forest safeguarding land for the provision of new schools to meet government planning policy objectives as set out in Paragraph 94 of the NPPF. When new schools are developed, local authorities should also seek to safeguard land for any future expansion of new schools where demand indicates this might be necessary, in accordance with Planning Practice Guidance and DfE guidance on securing developer contributions for education. We would be happy to share examples of best practice. London Borough of Waltham Forest should also have regard to the Joint Policy Statement from the Secretary of State for Communities and Local Government and the Secretary of State for Education on Planning for Schools Development² (2011) which sets out the government's commitment to support the development of state-funded schools and their delivery through the planning system. In light of the above and the Duty to Cooperate on strategic priorities such as community infrastructure (NPPF para 24-27), DfE encourages close working with local authorities during all stages of planning policy development to help guide the development of new school infrastructure and to meet the predicted demand for primary and secondary school places. Please add DfE to your list of relevant organisations with which you engage in preparation of the plan. Please note that there are two routes available for establishing a new school. Firstly, a local authority may seek proposals from new school proposers (academy trusts) to establish a free school, after which the Regional Schools Commissioner will select the successful trust. Under this 'local authority presumption route' the local authority is responsible for finding the site, providing the capital and managing the build process. Secondly, school proposers can apply directly to DfE during an application round or 'wave' to set up a free</p>	

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Policy 57: Education and Childcare Facilities				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			school. The local authority is less involved in this route but may support groups in pre-opening and/or provide a site. Either of these routes can be used to deliver schools on land that has been provided as a developer contribution. DfE has published further general information on opening free schools as well as specifically in relation to opening free schools in garden communities.	
2275	Phoebe Juggins	Department for Education	<p>Policy 57 concerns development proposals for Education and Childcare Facilities. The policy states that development proposals for the above will be supported 'in areas of identified need'. DfE considers that in line with the NPPF, and the draft London Plan, also support needs and shortages in supply as well as future provision through the Development Plan consultation document) states that school places should be available to meet the needs of existing and future communities (emphasis added). The draft London Plan (consolidated changes) also states that with regard to accessibility to schools, that proposals should 'enable all children to travel actively to school (walk, cycle or travel by public transport)'. This is not considered to be wholly consistent with part B. of the policy which requires locations with 'good public transport accessibility.' Therefore, DfE proposes the following amendments to Policy 57:</p> <p>Development proposals for new education or childcare facilities in the borough will be supported In areas of identified current and future need In locations which are accessible by public transport, walking and cycling It is considered that this change is required to ensure that the policy is consistent with the London Plan and the NPPF and therefore sound. It is also important that the policy is clear that education provision is also needed for future growth, and as such, the amendment will be required in the interest of positive planning. The supporting text to the policy refers to the School Design</p>	Noted for consideration.

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Policy 57: Education and Childcare Facilities				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			Charter, which may also need to be reviewed and/or updated in respect of the most recent NPPF and London Plan policies.	
2277	Phoebe Juggins	Department for Education	<p>The next version of the Local Plan should seek to identify where schools (expansion of existing or new) will be required as part of the specific/strategic site allocations which can deliver the school places needed to support growth, based on the latest evidence of identified need and demand. The site allocations and/or associated safeguarding policies should also seek to clarify requirements for the delivery of new schools, including when they should be delivered to support housing growth, the minimum site area required, any preferred site characteristics, and any requirements for safeguarding additional land for future expansion of schools where need and demand indicates this might be necessary. Viability assessment should inform options analysis and site selection, with site typologies reflecting the type and size of developments that are envisaged in the borough/district. This enables an informed judgement about which developments would be able to deliver the range of infrastructure required, including schools, leading to policy requirements that are fair, realistic and evidence-based. In accordance with Planning Practice Guidance, there should be an initial assumption that applicable developments will provide both land and funding for the construction of new schools. The total cumulative cost of complying with all relevant policies should not undermine deliverability of the plan, so it is important that anticipated education needs and costs of provision are incorporated at the outset, to inform local decisions about site selection and infrastructure priorities. While it is important to provide this clarity and certainty to developers and the communities affected by development, retaining a degree of flexibility about site specific requirements</p>	<p>The points made are noted. The Council is preparing an additional Local Plan document on site specific allocations. This will provide opportunity to apply the policies of the plan on specific sites, including those to be safeguarded for school development as may be required to support growth. This plan document will be supported by a viability assessment which will test the deliverability of proposals on the sites identified. Alongside the Local Plan, Waltham Forest Council is preparing a new Supplementary Planning Document on Planning Obligations. This will set out specific requirements for developer contributions on the provision of school places. Regarding the methodology for calculating school place requirements, the Council is committed to working with Duty to Cooperate Partners and other organisations such as the DfE to agree an approach going forward. Such cooperation will also include Statements of Common Ground where required. The Local Plan will also be supported by an Infrastructure Delivery Plan, which will set out details of the borough's infrastructure requirements. This document will set out what is needed, where it is needed and when it is needed including the position on school provision. It will also set out the delivery mechanism to ensure the timely delivery of infrastructure. This document will be published with the final version of the plan.</p>

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Policy 57: Education and Childcare Facilities				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			<p>for schools is also necessary given that the need for school places can vary over time due to the many variables affecting it. DfE therefore recommends the Council consider highlighting in the next version of the Local Plan that: - specific requirements for developer contributions to increasing capacity of existing schools and the provision of new schools for any particular site will be confirmed at application stage to ensure the latest data on identified need informs delivery; and that - requirements to deliver schools on some sites could change in future if it were demonstrated and agreed that the site had become surplus to requirements, and is therefore no longer required for school use. Evidence Base The consultation document notes that the 'cohort survival method' is used for calculating school place requirements in LBWF. It would be helpful for DfE to be able to engage with LBWF on understanding the evidence base, as DfE is in the process of developing methodology guidance on calculating pupil yield arising from housing developments. Given the significant growth context for housing in LBWF, it would be pertinent to consider additional sources of data beyond the historic birth rates as currently used. In this regard, it would be useful if the Infrastructure Delivery Plan/Infrastructure Funding Statement could set out clearly how the forecast housing growth has been translated (via an evidence based pupil yield calculation) into an identified need for specific numbers of school places and new schools over the plan period. This would help to demonstrate that the approach to the planning and delivery of education infrastructure is justified based on proportionate evidence. Paragraph 20.23 notes the framework for the IDP; DfE suggest that the provision of schools is highlighted in this. Given the potential for cross-borough boundary movement of school pupils between LBWF and adjoining areas, DfE recommends that the Council covers</p>	

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Policy 57: Education and Childcare Facilities				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			this matter and progress in cooperating to address it as part of its Statement of Common Ground. This should be regularly updated during the plan-making process to reflect emerging agreements between participating authorities and the Council's own plan-making progress.	
2579	Anne Hamshaw		There is a waiting list for local Schools so how will they cope, assuming children will move in. At present I think only Rushcroft is fairly low on intake as a Senior School.	Noted. The Council is producing an Infrastructure Delivery Plan (IDP) Document which sits alongside the Local Plan. This document will assist the borough in calculating local school provision in the Local Plan Period.

Chapter 13: Promoting Health and Well-being				
ID	Full Name	Organisation	Comment	Council (Officers) Response
198	Miss Anna Misterska		Yes, yes yes! Healthy food, clean air and promotion of active lifestyles.	Noted. Support welcomed.
204	Ms Karen Hayes		Promoting healthy communities: Would like to see explicit support for providing additional sports and leisure facilities to accommodate the increased population of the borough High quality environment: Would like it made explicit that "Promoting and encouraging well designed, safe and accessible spaces for social interaction;" includes within residential developments as well as public spaces.	Noted. The next iteration of the Local Plan will be published with full alignment to the forthcoming Sports Facility and Playing Pitch Strategy.
242	Valerie Muscutt		Space helps- not vast infilling.	Comment noted.
272	Nur Karatas		Openness to new energy healing quantum theory and metaphysic and Reiky: more government funding for mental health and alternative healing's (other than medication) = connecting with people and get young people not social media spirituality, inner being etc	Noted for consideration.

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Chapter 13: Promoting Health and Well-being				
ID	Full Name	Organisation	Comment	Council (Officers) Response
387	Mr Declan Hamblin		There seems to be a lack of thought regarding early years play spaces, which are perhaps the most important in setting up children to lead physically active lives. In North Chingford there is nothing from Pimp Hall/Ridgeway Parks towards Epping Forest, which is a huge area. There should be a strategic ambition that families have to walk less than 10 minutes to access playground spaces. Utilising 'dead' space could solve this, i.e. there are lots of snippets of spaces that Waltham Forest Council own that could be converted. A physically active and inquisitive child will have more chance of developing physical literacy and continue to lead a physically active life through to adulthood.	Noted for consideration. The North of the borough has high levels of access to open space within minutes of walking and cycling.
437	Miss Joanna Moncrieff		With respect to healthy individuals yes they should walk and cycle more but with respect to other groups of people such as the elderly, families with young children and the disabled this is not an option for them. Building on the car parks in North Chingford will also have a detrimental effect on the local shops. There are already many empty shops - probably 10% and many of our good local shops have already been forced out because of the parking restrictions. We already have good public transport links in Chingford - trains every 15 minutes and numerous buses - but the shops are still closing. It is the lack of parking which is forcing shops to close. Please reconsider this or we will end up with even more empty shops.	Noted. The Local Plan reflects Waltham Forest Council's commitment to TfL's Healthy Streets principles and the Mayor's Transport Strategy to provide low traffic liveable neighbourhoods. The Council is committed to the reduction of private car use in the lifetime of this Local Plan. Policy 72 sets out the thresholds for car parking in the Borough in line with the Intent to Publish London Plan 2019 which includes the contributions that future development may make in the extension of parking controls in the Borough.
444	Mrs Krysia Sivyer		Please remember that not everyone is able bodied. Some people need cars, e.g. the elderly, inform and people with children. For those that are able bodied public transport has to be accessible and dependable. At the moment it is not. Cycles can be hugely dangerous to pedestrians as they are frequently ridden recklessly on public walkways. I no longer take my small grandchildren out to the forest for fear of an accident caused by fast cyclists racing thoughtlessly and selfishly through the forest and along the paths.	In line with the London Plan, Waltham Forest Council is committed to the delivery of Liveable Neighbourhoods and Healthy Streets in the Borough. This means that active modes of travel and public transport will be prioritised in order to improve air quality, provide better public realm and wayfinding, reduce road danger and increase the attractiveness of the district centre to residents and visitors.

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Chapter 13: Promoting Health and Well-being				
ID	Full Name	Organisation	Comment	Council (Officers) Response
490	Ms Alison Hill		Food growing spaces water fountains and public toilets are all great ideas. Healthy communities is not just about the built environment though.	Noted for consideration. Allotments are protected as part of the Local Plan and food growing opportunities are promoted.
504	Ms Kate Bundock		See comments on housing. Design of new buildings is important. Present designs are ugly and depressing to look at. More amenities are needed for leisure time activities - but without the space to build or develop them. There must be residents who need help with numeracy and literacy to improve CVs for job applications. Over the years facilities for the elderly have closed and not been rebuilt or replaced, such as day centres. So much for their well-being! An increase in population will ultimately lead to the need for cemetery places. As other boroughs will experience the same problem, what provision will be made? Will part of Essex be a burial ground? Health centres should be supported and made places of welcome and people with mental health or social problems will use them. For all ages with the right encouragement. Face the fact that there is unrest among the teenagers leading to stabbings and petty crime. Ask why and act on measures to reduce incidents, provide facilities as a diversion and places of safety.	Noted. This comment will be considered in the next draft of the Local Plan.
561	Mrs Barbara Chapman		The infrastructure of the area, especially doctors, schools, and transport, cannot possibly sustain these proposals.	Noted. The emerging Local Plan will be adjoined with a detailed Infrastructure Delivery Plan, which is due for publication ahead of the commencement of the Regulation 19 Consultation.
575	Mr David Smith		Recent developments in Highams Park have left a significant impact on infrastructure, not excluding train services, doctor appointments, road traffic, and of course schooling, where a certain local school STILL have classes consisting of over 30 pupils. I feel a minimum of 450 additional homes is way too high, and will change the character of the area significantly, as well as bringing the town to a halt, as infrastructure is already at break point.	Noted. The Local Plan will be joined by a full and detailed Infrastructure Delivery Plan ahead of the Regulation 19 consultation. This document will detail the infrastructure that will need to be delivered in the Plan Period to ensure that there is adequate infrastructure planned for this period.

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Chapter 13: Promoting Health and Well-being				
ID	Full Name	Organisation	Comment	Council (Officers) Response
819	Ms Tessa Craig		The Trust supports the objective this objective and policy 58 to promote the creation of healthy and sustainable places and community, and we are well-placed to support walking and cycling, outdoor activities, active lives, access to green and blue space and social connection.	Support noted.
931	Mr Mathew Frith		Para 13.8: We support this	Support noted.
932	Mr Mathew Frith		Para 13.9: We welcome and support this.	Support noted.
1525	Ms Mary Manuel		We welcome and support the inclusion of this chapter.	Support noted.
1562	Mr Tim Madelin	Associate Director of Estates (Strategic) NHS North East London Commissioning Alliance	We welcome and support the inclusion of this chapter.	Support noted.
2285	Abbas Mirza		We need an integrated Health & Wellbeing approach that takes in our developments plans for housing housing + economic development.	Health is integrated throughout the Local Plan. Policy 59 High Quality Environment will ensure that all new development contributes to high quality environment that enable and help shape healthy and active lifestyles, meet appropriate environmental standards and ensure all buildings meet the highest standards of accessible and inclusive design.
2316	Mr Tim Madelin	Associate Director of Estates (Strategic)	We welcome and support the inclusion of this chapter.	Support noted.

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Chapter 13: Promoting Health and Well-being				
ID	Full Name	Organisation	Comment	Council (Officers) Response
		NHS North East London Commissioning Alliance		
2561	Miss Anna Misterska		Yes, yes yes! Healthy food, clean air and promotion of active lifestyles	Support noted.
2565	Valerie Muscutt		Space helps - not vast infilling.	This comment is noted.
2566	Nur Karatas		Openness to new energy healing quantum theory and metaphysic and Reiky: more government funding for mental health and alternative healing's (other than medication) = connecting with people and get young people not social media spirituality, inner being etc	This comment is noted.
2567	Mr Declan Hamblin		There seems to be a lack of thought regarding early years play spaces, which are perhaps the most important in setting up children to lead physically active lives. In North Chingford there is nothing from Pimp Hall/Ridgeway Parks towards Epping Forest, which is a huge area. There should be a strategic ambition that families have to walk less than 10 minutes to access playground spaces. Utilising 'dead' space could solve this, i.e. there are lots of snippets of spaces that Waltham Forest Council own that could be converted. A physically active and inquisitive child will have more chance of developing physical literacy and continue to lead a physically active life through to adulthood.	This comment is noted in preparing the Proposed Submission Local Plan.

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Policy 58: Promoting healthy communities				
ID	Full Name	Organisation	Comment	Council (Officers) Response
930	Mr Mathew Frith		We support this, especially Part F.	Support noted.
1082	Ms Alison Blom-Cooper	Planning Department Epping Forest District Council	The Council also welcomes the qualitative improvements sought to provide business space, cultural and retail facilities in the borough, particularly in the Central Area. In addition the policies protecting the growing of food and allotments are welcomed as is the suite of policies in response to climate change.	Support noted.
1248	Rosie Sterry	Transport for London - Commercial Development	In line with the Mayor's Transport Strategy, TfL CD strongly supports the proposal of the borough to encourage active and sustainable travel through walking, cycling and the use of public transport and the adoption of the Healthy Streets Approach	Support noted.
1526	Ms Mary Manuel		Policy 58 Promoting Healthy Communities is generally supported, however, we consider that the wording of this policy should be strengthened 'requiring' rather than 'encouraging' the mitigation of pollutants, and developments should support active travel rather than 'encouraging'. Comments earlier proposed that clause G of Policy 55 (Chapter 12) is strengthened changing 'expected' to 'required' and this should be the position taken in Policy 58. Clause D as written does not require developers to contribute to health. "A. Encouraging active and sustainable travel through requiring developments to prioritise walking, cycling and the use Working with NHS partners, schools and community groups and developers to support the provision of new and improved healthcare facilities and improvements to existing facilities; Again, we welcome the requirement for HIAs across a range of uses, however, how the promotion of health and wellbeing can be incorporated within smaller residential developments through, for example, using the HUDU checklist for health and wellbeing would be a useful addition . Para 13.5 should make reference to developers	General support for Policy 58 Promoting Healthy Communities is noted. The strengthening of the some of the policy wording is noted in preparing the Proposed Submission of the Local Plan.

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Policy 58: Promoting healthy communities				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			contributing to improved/modern health care, and then 'collaboration with NHS etc' to ensure delivered in a timely manner when funding secured. Reference to contributions in line with the HUDU Planning Obligations Model calculations could be made here or in the earlier chapter.	
1552	Mark Furnish	Sport England	Sport England considers that the design of where communities live and work is key to keeping people active and placemaking should create environments that make the active choice the easy choice. Sport England along with Public Health England have launched our revised guidance, Active Design, which intends to inform the urban design of places, neighbourhoods, buildings, streets and active open spaces to promote sport and active lifestyles. The guide sets out ten principles to consider when designing places that would contribute to creating well designed healthy communities which has considerable synergy with many elements of the Draft Local Plan, particularly in relation to encouraging healthy communities. Sport England recommend that these links between the Draft Local Plan and Active Design are developed further and are really drawn out in the Draft Local Plan by having clear references to Active Design, its principles and the Active Design Checklist within the Local Plan. Active Design principles and the checklist, for example, could be added to the design requirements in Policies 59, 60 and/or 63 with proposals required to demonstrate who the Active Design Principles have been incorporated within the scheme and completing the Active Design Checklist. More information on Active Design, including the guidance, can be found via the following link;	The inclusion of Active Design guidance is noted in preparing the Proposed Submission Local Plan.
1555	Mark Furnish	Sport England	Paragraph 15.5, which supports Policy 59, states schools should enter into Community Use Agreements which is important to secure long-term community use of facilities. Sport England have a Community Use Agreement template which could be of use for applicants. This can be found at	This comment is noted. The Council will review and take Community Use Agreements into consideration when preparing the Proposed Submission Local Plan.

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Policy 58: Promoting healthy communities				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			https://www.sportengland.org/facilities-and-planning/planning-for-sport/planning-tools-and-guidance/community-use-agreements/ . Sport England would encourage that the Draft Local Plan provides a link to this template.	
1563	Mr Tim Madelin	Associate Director of Estates (Strategic) NHS North East London Commissioning Alliance	Policy 58 Promoting Healthy Communities is generally supported, however, we consider that the wording of this policy should be strengthened 'requiring' rather than 'encouraging' the mitigation of pollutants, and developments should support active travel rather than 'encouraging'. Comments earlier proposed that clause G of Policy 55 (Chapter 12) is strengthened changing 'expected' to 'required' and this should be the position taken in Policy 58. Clause D as written does not require developers to contribute to health. "A. Encouraging active and sustainable travel through requiring developments to prioritise walking, cycling and the use Working with NHS partners, schools and community groups and developers to support the provision of new and improved healthcare facilities and improvements to existing facilities;"	General support for Policy 58 Promoting Healthy Communities is noted. The strengthening of the some of the policy wording is noted in preparing the Proposed Submission of the Local Plan
1564	Mr Tim Madelin	Associate Director of Estates (Strategic) NHS North East London Commissioning Alliance	Again, we welcome the requirement for HIAs across a range of uses, however, how the promotion of health and wellbeing can be incorporated within smaller residential developments through, for example, using the HUDU checklist for health and wellbeing would be a useful addition .	The comment is noted. The current threshold of 100 housing units or more and 10,000sqm of non-residential developments or more is in line with the Draft London Plan.
1565	Mr Tim Madelin	Associate Director of Estates (Strategic) NHS North	Para 13.5 should make reference to developers contributing to improved/modern health care, and then 'collaboration with NHS etc' to ensure delivered in a timely manner when funding secured.	This comment is acknowledged. The Council recognises the need to refer to developers contributing to improved/modern health care in Paragraph 13.5 to ensure the funding and delivery of improved and modern health care facilities in the borough.

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Policy 58: Promoting healthy communities				
ID	Full Name	Organisation	Comment	Council (Officers) Response
		East London Commissioning Alliance		
1566	Mr Tim Madelin	Associate Director of Estates (Strategic) NHS North East London Commissioning Alliance	Reference to contributions in line with the HUDU Planning Obligations Model calculations could be made here or in the earlier chapter.	The council recognises the importance of the HUDU Planning Contributions Model to assess health services requirements and cost impacts of new residential development. The new Planning Obligations SPD will include reference to the calculation of the contributions in line with the HUDU Planning Obligations Model calculations. In addition, Waltham Forest Council is working with the CCG on locally distinctive contributions.
1567	Mr Tim Madelin	Associate Director of Estates (Strategic) NHS North East London Commissioning Alliance	Reference to contributions in line with the HUDU Planning Obligations Model calculations could be made here or in the earlier chapter.	This comment is noted and will be revised in the Proposed Submission Local Plan.
1939	Tony Thorne		It has been publicly accepted that the area's medical facilities are currently insufficient to meet demand and that there is an immediate need for additional provision. It would appear that with the existing provision that you need to know when you will need to see the Doctor at least two weeks in advance due long lead time with appointments.	The Council is aware of the need to increase the existing provision of health facilities in the borough. This comment is noted in preparing the Infrastructure Delivery Plan.
1940	Tony Thorne		It is suggested that part of the solution could be the introduction of Medical Centres However, these appear that large numbers of the population want continuity in being able to see the same Doctor where as currently with the Medical Centre approach you end up with the Doctor who has the next available appointment. This I would suggest by its nature is inefficient and wastes Doctor's time	This comment is noted.

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Policy 58: Promoting healthy communities				
ID	Full Name	Organisation	Comment	Council (Officers) Response
2142	anonymous response form 1		The policies on health and well-being only support those who are able bodied. Mental Health have lost their two day centres and the only activity on offer is Leyton Orient football, which is not applicable to most people with mental health problems.	The Council acknowledge the need to support Mental Health in the borough and this comment is noted in preparing the Proposed Submission Local Plan.
2143	anonymous response form 1		All the local organisations that supported vulnerable people lost their grants (WF Carers, VOL. Action, Mencap, Scope) and their new organisations reach very few people. All the volunteers were also lost. Vulnerable people were just told to join course that were not suitable for them	This comment is noted.
2317	Mr Tim Madelin	Associate Director of Estates (Strategic) NHS North East London Commissioning Alliance	Policy 58 Promoting Healthy Communities is generally supported, however, we consider that the wording of this policy should be strengthened 'requiring' rather than 'encouraging' the mitigation of pollutants, and developments should support active travel rather than 'encouraging'. Comments earlier proposed that clause G of Policy 55 (Chapter 12) is strengthened changing 'expected' to 'required' and this should be the position taken in Policy 58. Clause D as written does not require developers to contribute to health. "A. Encouraging active and sustainable travel through requiring developments to prioritise walking, cycling and the use Working with NHS partners, schools and community groups and developers to support the provision of new and improved healthcare facilities and improvements to existing facilities." Again, we welcome the requirement for HIAs across a range of uses, however, how the promotion of health and wellbeing can be incorporated within smaller residential developments through, for example, using the HUDU checklist for health and wellbeing would be a useful addition . Para 13.5 should make reference to developers contributing to improved/modern health care, and then 'collaboration with NHS etc' to ensure delivered in a timely manner when funding secured. Reference to contributions in line with the HUDU Planning Obligations Model calculations could be made here or in the earlier chapter.	The comment is noted. The current threshold of 100 housing units or more and 10,000sqm of non-residential developments or more is in general conformity with the Draft London Plan.

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Policy 58: Promoting healthy communities				
ID	Full Name	Organisation	Comment	Council (Officers) Response
2522	Sal Asghar	London Borough of Waltham Forest	Ideally, all new developments in the borough should have an ask from developers around how they will facilitate social integration of not just new residents living in the development but also how the new residents will be encouraged to reach out to other people living locally.	This point is acknowledged. The Post Submission Local Plan will include policies to encourage social integration within local communities and address issues surrounding loneliness.
2524	Sal Asghar	London Borough of Waltham Forest	The key bit from an integration point of view is how to we use the regeneration plans to build a borough that promotes social integration, helps develop a more cohesive community, and those in the borough don't left behind. This shouldn't be about wealthy people moving in and our existing residents from more deprived backgrounds being forced out whether intentionally through our policies our unintentionally through letting market forces dictate the state of play. We need to be actively place shaping ensuring our residents benefit from the opportunities regeneration will bring.	This point is acknowledged. The Proposed Submission Local Plan will include policies to support social integration as well as, greater emphasis for proposals that will help to encourage and support more cohesive community within Waltham Forest
2525	Sal Asghar	London Borough of Waltham Forest	In summary, how to do we use the local plan to build within our local planning policy the importance of driving integration and promoting community cohesion.	The Council recognises the importance of community cohesion and for all Waltham Forest residents and visitors to have safe and accessible spaces where they can gather and interact. Policy 59 High Quality Environment, Part B supports proposals for new developments that promote and encourage well designed, safe and accessible spaces for social interaction and will act a driving force for integration, community cohesion, healthy and inclusive communities within Waltham Forest.
2563	Ms Karen Hayes		Promoting healthy communities: Would like to see explicit support for providing additional sports and leisure facilities to accommodate the increased population of the borough	This comment is noted. Policy 85 Opens Spaces Sport and Recreation ensures the adequate provision, protection and enhancement of existing and new play and recreational spaces and outdoor sports facilities to accommodate the increasing population of the borough.
2568	Miss Joanna Moncrieff		With respect to healthy individuals yes they should walk and cycle more but with respect to other groups of people such as the elderly, families with young children and the disabled this is not an option for them.	This comment is noted in preparing the Proposed Submission of the Local Plan. The Council acknowledges that not all residents within Waltham Forest are able to walk and cycle. Policy 69 Public Transport will ensure that the Council will continue to

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Policy 58: Promoting healthy communities				
ID	Full Name	Organisation	Comment	Council (Officers) Response
				work with TfL to improve and enhance the existing bus network and public transport infrastructure to ensure all residents and especially those less able to travel via foot or bike can travel sustainable throughout the borough.
2628	Ms Alison Hill		Food growing spaces water fountains and public toilets are all great ideas. Healthy communities is not just about the built environment though.	General support for food growing, water facilities and public toilets is noted. The Council is aware that healthy communities do not just pertain to the built environment and pride itself for working across multiple departments, with NHS partners, schools, community groups to ensure healthy communities within the borough.

Policy 59: High-quality environment				
ID	Full Name	Organisation	Comment	Council (Officers) Response
933	Mr Mathew Frith		We support this, but recommend Part C should also specifically reference the opportunities to deliver biodiversity net gain and other green infrastructure.	Support noted and comment will be taken into consideration when preparing the Proposed Submission Local Plan.
1553	Mark Furnish	Sport England	Sport England considers that the design of where communities live and work is key to keeping people active and placemaking should create environments that make the active choice the easy choice. Sport England along with Public Health England have launched our revised guidance, Active Design, which intends to inform the urban design of places, neighbourhoods, buildings, streets and active open spaces to promote sport and active lifestyles. The guide sets out ten principles to consider when designing places that would contribute to creating well designed healthy communities which has considerable synergy with many elements of the Draft Local Plan, particularly in relation to encouraging healthy communities. Sport England recommend that these links between the Draft Local Plan and Active Design are developed further and are really drawn out in the Draft Local Plan by having clear references to Active Design,	The inclusion of Active Design guidance is noted in preparing the Proposed Submission Local Plan.

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Policy 59: High-quality environment				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			its principles and the Active Design Checklist within the Local Plan. Active Design principles and the checklist, for example, could be added to the design requirements in Policies 59, 60 and/or 63 with proposals required to demonstrate who the Active Design Principles have been incorporated within the scheme and completing the Active Design Checklist. More information on Active Design, including the guidance, can be found via the following link;	
1988	Dr Robert Gay		There need to be places accessible by public transport (and in particular, by the Night Tube at weekends) where 'bad neighbour' leisure uses (such as the club I mentioned at the meeting, which is open to 3am close to Mile End Tube, and which would certainly be a bad neighbour to a residential development on its site) can be accommodated without nuisance to residential occupiers.	The Council has acknowledged the need for noisy leisure uses such night-time uses to be accessible by public transport. Policy 53 Evening and Night-time Economy uses aims to direct noisy night-time leisure uses such as clubs, bars or restaurants to the boroughs designated town centres with access to public transport. The emerging London Plan has designated Walthamstow Town Centre as an area of regional or sub-regional significance for evening and night-time economy uses and accordingly, the Council aims to promote and encourage night-time and evening economy uses in this centre.
2564	Ms Karen Hayes		High quality environment: Would like it made explicit that "Promoting and encouraging well designed, safe and accessible spaces for social interaction;" includes within residential developments as well as public spaces.	This comment is noted in preparing the Proposed Submission Local Plan.

Policy 60: Hot Food Takeaways				
ID	Full Name	Organisation	Comment	Council (Officers) Response
1527	Ms Mary Manuel		Supported.	Support noted.

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Policy 60: Hot Food Takeaways				
ID	Full Name	Organisation	Comment	Council (Officers) Response
1568	Mr Tim Madelin	Associate Director of Estates (Strategic) NHS North East London Commissioning Alliance	Supported.	Support noted.
1628	Bob Bennet		The policy only applies to A5 uses. However, the distinction between A3 and A5 uses are becoming unclear as many A3 uses, use Uber or Just Eat or employ their own couriers to deliver take away meals. There is also the assumption in this policy that all A5 uses provide unhealthy food, but this is clearly not true. There are examples of hot take away food shops which only sell healthy, high quality, hot and cold vegan food even Greggs!.	The Council recognises the importance of increasing and encouraging healthy food options in the borough and will take this comment into consideration when preparing the Proposed Submission of the Local Plan.
1822	Robert Tatam		Policy 60 regarding the restricting of additional hot food take-aways within 400 metres of a school entrance is good, but does not go far enough. The obesity rates among school pupils require a robust carrot-and-stick approach to a change of use for existing hot food take-aways that are located near schools and youth facilities. And a ban too should be introduced on ice cream vans being parked within 150 metres of the school entrance on school days.	This comment is noted in preparing the Proposed Submission Local Plan. The Local Plan does not have the planning power to control the operation or change of use of existing uses classes or businesses. Policy 60 will ensure the prevention of the future overconcentration of hot food takeaway's within proximity to schools.
1823	Robert Tatam		Policies 60, 61 and 63 require targets to be meaningful.	This comment is noted in preparing the Proposed Submission Local Plan.
1857	Mike Chrimes		The plan generally talks of trying to restrict fetch opening of fastfood takeaway outlets across the borough, but no solution is offered to their existing proliferation in many shopping centres, far in excess of the guidelines	This comment is noted. The Local Plan does not have the planning power to control the operation of existing use classes. Policy 60 Hot Food Takeaways ensures to prevent the future overconcentration of hot food takeaways in the borough to enable all residents (existing and future) can make healthier food choices.

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Policy 60: Hot Food Takeaways				
ID	Full Name	Organisation	Comment	Council (Officers) Response
2318	Mr Tim Madelin	Associate Director of Estates (Strategic) NHS North East London Commissioning Alliance	Supported.	Support noted.

Policy 61: Betting Shops and Payday Loan Shops				
ID	Full Name	Organisation	Comment	Council (Officers) Response
1824	Robert Tatam		Policies 60, 61 and 63 require targets to be meaningful.	This comment is noted in preparing the Proposed Submission Local Plan.

Chapter 14: Creating High Quality Places				
ID	Full Name	Organisation	Comment	Council (Officers) Response
19	Mr Mark Alderton		I agree with the broad aims of the Strategic Objective, but please resist the temptation to build tall buildings across the borough, particularly in the Lea Bridge Area. The towers that are being built next to Lea Bridge Station already look totally out of character with the rest of the area and dominate the surroundings. We do want to become (and I do not want to live in!) the next Stratford!	The Council has worked with consultants on a Characterisation and Intensification Study, which proposes an approach to intensification that does not purely rely on height for housing delivery.
446	Mrs Krysia Sivyer		More fine words! Lets hope you can deliver!	Comment noted.

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Chapter 14: Creating High Quality Places				
ID	Full Name	Organisation	Comment	Council (Officers) Response
481	Mrs Sarah Sanders	Committee Member DADRA	In a number of the consultation meetings official representatives have suggested that were the site of Motorpoint at Sewardstone Road to be offered for development this would be suitable for multiple high rise buildings of 7-10 storeys. We would disagree with this point strongly in light of policy 63. A - Such buildings would not have proximity to suitable public transport connections. The area is already at a low level of PTAL. B - There would be a large impact on the character of surroundings in this quiet neighbourhood of family homes. C/G - There would be a big impact on the visual dominance of Pole Hill and the green of Epping Forest.	This comment is noted. There are no site allocations in the Local plan. We will be consulting on a Site Allocations document alongside the Local Plan in 2020.
491	Ms Alison Hill		With regard to taller buildings I do not believe B C E F G (Blackhorse Rd) H I and J are being taken seriously.	Comment noted for consideration
524	Miss Joanna Moncrieff		I am quite worried about the contents of the draft Area Investment Plan in relation to North Chingford. The area between the station and the Forest is not suitable for tall residential buildings. One of the great joys of living in Chingford is the fact that you can see the Forest ahead of you as you walk down Station Road towards the Station. I love living on the edge of the Forest and would absolutely hate it if my view was blocked.	The Area Investment Plan is an internal Council document that does not form part of the Local Plan. The Local Plan makes reference to possible locations for taller buildings in the North Chingford strategic location but does not allocate sites. A sites allocation document will be published for consultation in Autumn 2020.
588	Mrs Sheree Mear		Concerns regarding the plan, including Highams Park being identified as one of the areas for intensification with a huge minimum target for additional homes within 800 metres of Highams Park Town Centre. The targets are way too high and will have a huge negative impact on the area. These targets do not even align with the vision of the draft plan which is to retain the local character of different areas. To accommodate this level of development would potentially require demolition and redevelopment of existing buildings (possibly the Library, the station and some of the shopping parades in the town centre)	The Council is preparing an additional Local Plan document on site specific allocations. This will provide opportunity to apply the policies of the plan on specific sites, providing more details on how new developments could be integrated within existing local areas.

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Chapter 14: Creating High Quality Places				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			and infill developments throughout the area. Development on such a scale would be a disaster for Highams Park and damage the character of Highams Park irreparably. Delivery of housing targets should never be achieved in such a way as to only provide minimum standards, and developments should not be 'squeezed in' which, in respect of Highams Park would adversely affect the character of the whole area to the detriment of existing residents and new residents.	
829	Ms Tessa Craig		We support the strategic objective of promoting exemplary standards of design in place-making and the highest quality of development.	Noted. Support welcomed.
1136	Stagecoach		As previously identified, Stagecoach recognised the importance of good design and are supportive of the need for development to deliver high quality and the principle of the policies set out in within Chapter 14.	Comment noted for consideration.
1569	Mr Tim Madelin	Associate Director of Estates (Strategic) NHS North East London Commissioning Alliance	This chapter is welcomed as the quality of design contributes to health and wellbeing. It can make an area easier to navigate, encourage active travel and movement, and support good mental health and wellbeing.	Noted. Support for policy welcomed.
2892	Mr Roland Karthaus	member Architects E17	Yes, promote exemplary standards of design in place-making (add "and architecture") and the highest quality of development. Policy 66 A see above under policy 63.	This comment is noted.
2901	Mr Mark Alderton		Affordable private and social housing does not need to be high rise - we are repeating historic mistakes just to maximise developer profits! We need to learn from the recent award winning development of social housing in Norwich - Goldsmith Street. This development has so much in common with the beautiful Warner flats that define the Waltham Forest area, and	The Council has worked with consultants on a Characterisation and Intensification Study, which proposes an approach to intensification that does not purely rely on height for housing delivery.

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			the council has a real opportunity here to do something special and leave a Warner style legacy that will stand for the next 100yrs!	
2902	Mr Mark Alderton		The council has shown bravery and vision with the mini-holland scheme, now we need that same bravery and vision to show the whole world how to build quality, beautiful, modern, eco-friendly, low rise homes that have a sense of community.	This comment is noted. The Council is committed to the delivery of quality housing and liveable neighbourhoods.
2903	Mr Mark Alderton		The development in Norwich not only leads the way architecturally, but also in the model of council led ownership that they have taken. If this can be achieved in Norwich, surely Waltham Forest has the resources to do something similar? https://www.architecture.com/awards-and-competitions-landing-page/awards/riba-regional-awards/riba-east-award-winners/2019/goldsmith-street https://www.theguardian.com/artanddesign/2019/jul/16/norwich-goldsmith-street-social-housing-green-design	This comment is noted for further discussion.
2904	Mr Mark Alderton		Please also recognise the importance of maintaining the existing green spaces. Lea Bridge has a green-ness and natural feel about it, which is unique in this part of London. Just because there is green space outside Lea Bridge Station and across at the junction of Lea Bridge Road/Orient Way does not mean that it needs to be built on. These spaces can be preserved and improved to maintain the connection that this area has with nature and the nearby marshes.	The Council recognises the value of its green and blue spaces within the urban fabric of the borough and has developed appropriate policies for its protection and enhancement.
2925	Mrs Sarah Sanders	Committee Member DADRA	Point 14.5 "Taller buildings will be assessed in line with the Characterisation and Intensification Study (2019)" - This document has not been available for consideration - this makes it impossible to provide informed comments.	The Characterisation and Intensification Study can be found in the Planning Policy evidence base section of Waltham Forest Council's website at: https://www.walthamforest.gov.uk/sites/default/files/LBWF%20Character%20and%20Intensification%20Study%2C%202019.pdf

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Policy 62: Delivering High-Quality Design				
ID	Full Name	Organisation	Comment	Council (Officers) Response
360	Mike Chrimes		The character study on what this is based has not been published. It needs to be.	This comment is noted. The Local Plan is informed by the Characterisation and Intensification Study 2019 evidence base document. This can be found in the Local Plan Evidence base section of the Council's website.
643	Mr Gordon Turpin	Highams Park Planning Group	Lea Bridge and Church Road, Walthamstow Town Centre, Development should be a maximum of five stories in the district centre.	Building heights need to be appropriate to the location in which they are proposed. Where appropriate, taller buildings can help to optimise the use of land and assist in accommodating the borough's anticipated growth. To inform policy development and manage growth and change in local areas, Waltham Forest Council commissioned a Characterisation and Intensification Study, which is available on our website. This has informed the emerging Local Plan and will be used in assessing planning applications when they are submitted. The Council has also started work on a Strategic Site Allocations Development Plan Document, which will complement the emerging Local Plan Policies. This document will identify strategic development sites and provide details on their existing context. It will then go on to set out preferred use(s), parameters for building heights, potential access arrangements and other key planning considerations for development proposals. In preparing this additional document, officers will engage with local resident/community groups.
738	Mr Gordon Turpin		Lea Bridge and Church Road, Walthamstow Town Centre, Development should be a maximum of five stories in the district centre.	Building heights need to be appropriate to the location in which they are proposed. Where appropriate, taller buildings can help to optimise the use of land and assist in accommodating the borough's anticipated growth. To inform policy development and manage growth and change in local areas, Waltham Forest Council commissioned a Characterisation and Intensification Study, which is available on our website. This has informed the emerging Local Plan and will be used in assessing planning applications when they are submitted. The Council has also started work on a Strategic Site Allocations Development Plan

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				Document, which will complement the emerging Local Plan Policies. This document will identify strategic development sites and provide details on their existing context. It will then go on to set out preferred use(s), parameters for building heights, potential access arrangements and other key planning considerations for development proposals. In preparing this additional document, officers will engage with local resident/community groups.
934	Mr Mathew Frith		We support this, especially Parts K and M.	Support for this policy is noted and The Council will be considering further guidance on urban greening as part of the Urban Design SPD, Site Allocations DPD and masterplanning work. The Council is working on a Biodiversity Strategy which will set out how we promote urban greening in the borough.
1250	Rosie Sterry	Transport for London - Commercial Development	TfL CD support part (e) of this policy which sets out that development proposals should consider appropriate intensification and density in line with Policy 5.	Support for this policy is noted. Following on from Waltham Forest Council's Characterisation and Intensification Study, we will be considering further guidance on appropriate intensification and density in development as part of the Site Allocations DPD and masterplanning work.
1408	Blackrock and NEAT Development		This policy is in general conformity with the New London Plan, but should make reference to the need to refuse applications that do not demonstrably optimise the capacity of a site, in line with New London Plan Policy D1B. It is also requested that the Design Council 'Building for Life 12' Criteria is properly defined in the supportive text. Further part (P) should define what is meant by high quality.	"Ensuring land optimisation" is one of the five strategic priorities for development in the Borough. As such, it is treated as a golden thread running through the entire document. For example: Policy 1 sets out the presumption in favour of sustainable development. Policy 4 (Part A) states that in order to ensure good growth development proposals will be expected to make efficient use of land through intensification and mixed-use development. Policy 23 (part E) states that opportunities for housing growth will be maximised by making effective and efficient use of land. Furthermore, Policy 62 (part E) requires development proposals to consider appropriate intensification and density in line with Policy 5. It is therefore not considered necessary to repeat the need to optimise site capacity again under Policy 62. The inclusion of further supporting text

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				defining the 12 Building for Life criteria will be considered in preparing the Proposed Submission Local Plan. The wording of Part P of Policy 62 will be reconsidered in preparing the Proposed Submission Local Plan. Further explanation in the supporting text will also be considered.
1409	Blackrock and NEAT Development		This policy is in general conformity with the NPPF, but should specifically include reference to the need to refuse applications that do not make efficient use of land, in line with NPPF para 36.	"Ensuring land optimisation" is one of the five strategic priorities for development in the Borough. As such, it is treated as a golden thread running through the entire document. For example: Policy 1 sets out the presumption in favour of sustainable development. Policy 4 (Part A) states that in order to ensure good growth development proposals will be expected to make efficient use of land through intensification and mixed-use development. Policy 23 (part E) states that opportunities for housing growth will be maximised by making effective and efficient use of land. Furthermore, Policy 62 (part E) requires development proposals to consider appropriate intensification and density in line with Policy 5. It is therefore not considered necessary to repeat the need to optimise site capacity again under Policy 62.
1528	Ms Mary Manuel		This chapter is welcomed as the quality of design contributes to health and wellbeing. It can make an area easier to navigate, encourage active travel and movement, and support good mental health and wellbeing .	Support for this policy is noted and we will be considering further guidance on urban design as part of the Urban Design SPD, Site Allocations DPD and masterplanning work.
1554	Mark Furnish	Sport England	Sport England considers that the design of where communities live and work is key to keeping people active and placemaking should create environments that make the active choice the easy choice. Sport England along with Public Health England have launched our revised guidance, Active Design, which intends to inform the urban design of places, neighbourhoods, buildings, streets and active open spaces to promote sport and active lifestyles. The guide sets out ten principles to consider when designing places that would contribute to creating well	The inclusion of Active Design guidance will be considered in preparing the Proposed Submission Local Plan. Review the Active Design guidance to see if can be incorporated or referred to in the Policy 59, 60 and 63.NOTE: reference to Policies 58, 59 and 62.

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Policy 62: Delivering High-Quality Design				
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			designed healthy communities which has considerable synergy with many elements of the Draft Local Plan, particularly in relation to encouraging healthy communities. Sport England recommend that these links between the Draft Local Plan and Active Design are developed further and are really drawn out in the Draft Local Plan by having clear references to Active Design, its principles and the Active Design Checklist within the Local Plan. Active Design principles and the checklist, for example, could be added to the design requirements in Policies 59, 60 and/or 63 with proposals required to demonstrate who the Active Design Principles have been incorporated within the scheme and completing the Active Design Checklist. More information on Active Design, including the guidance, can be found via the following link;	
1731	London and Quadrant (L&Q)	Director	L&Q strive to deliver high quality design across all their developments in London and is supportive of DLP Policy 62 (Delivering High Quality Design). L&Q welcome the approach to "Maintain high quality throughout entire planning process from permission through to completion". However, this statement is not supported by text as to what this actually means. LBWF should provide this information in their next update to the DLP prior to submitting to Plan for examination.	Support noted. The NPPF and draft new London Plan place a greater emphasis on achieving design quality, and for the first time explicitly reference the importance of maintaining quality between permission and completion. There are several mechanisms available to the Council to ensure high quality design is maintained from permission through to completion. This includes the production of masterplans, design codes and other supplementary planning guidance (for example the Urban Design SPD), the use of independent, expert design review, the continued involvement of Waltham Forest Council's Design and Conservation team and the inclusion of clearly worded planning conditions to secure detailed drawings or material samples. Where necessary we will also consider the use of Section 106 clauses to retain planning architects or secure design champions/ design certifiers to monitor and assess design quality through to completion. To reward and celebrate quality architecture and urban design within the borough, we also run the Waltham Forest Design Awards. The inclusion of text to

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				further explain and justify this will be considered in preparing the Proposed Submission Local Plan.
1809	Robert Tatam		Policy 62 on design measures for new buildings that increase climate change resiliency lacks any detail on the actual measures to increase resilience.	Design measures that increase climate change resiliency, as required under Policy 62 of the Draft Local Plan, are a constantly evolving and improving. Given the length of the plan period, it is considered appropriate to allow flexibility in this policy to apply the best design measures available at the time a planning application is submitted. It should be noted that Chapter 18 of the Draft Local Plan, Ensuring Climate Change Resilience, addresses this issue in greater detail. Policy 92, Sustainable Design and Construction, sets out requirements and expectations for the sustainable delivery of development.
2010	Dr Robert Gay		It is easy to speak in general terms about 'high quality design'. It would cut more ice if the Council gave examples of bad design, and committed itself not to allow any more like that. Specifically, respecting the character of Leyton and Leytonstone requires there not to be horizontal slabs, like the lower rise part of the recent development on Ruckholt Road in Leyton (opposite the turning going down to Asda). Any wide building (that is, wider than a single Victorian terrace unit would be) needs to be divided into vertical units which are clearly articulated (not just divided by a vertical drainpipe between every pair of windows) . Silks Court on the Leytonstone High Road at the corner of Barclay Road seems an example of what should be done.	In the Draft Local Plan, Policy 62 sets out detailed guidance relating to the delivery of high-quality design, with a clear emphasis on the character of the context in which it is built. This includes requirements for development proposals to: Reinforce and/or enhance local character and distinctiveness, taking account of patterns of development, urban form and grain, building typology, architecture, materials, trees and landscaping and other features of local and historical significance; Respond to their context in terms of scale, height and massing; Be visually attractive, with architecture and landscaping that respects its context without unduly restricting style and encouraging innovation. Further detailed guidance on achieving design quality can be found in Waltham Forest Council's Urban Design SPD. It is also important to note that the Council has in place a well-established, independent design review process.
2093	Mr Matthew Fletcher	Metropolitan Police Service	We are also supportive of Policy 62 and specifically Policy 65 which relates to Designing Out Crime and the Secured by Design Scheme. However, we would urge the following amendments:	Support noted. The amendments suggested will be considered in preparing the Proposed Submission Local Plan.

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			A. Minimise opportunities for criminal behaviour by requiring all forms of new development to incorporate 'Designing out Crime' and apply for and achieve accreditation via the Secured by Design scheme; B. Co-ordinate land uses to minimise the likelihood of an increase in crime and disorder; C. Promote safer streets and public realm improvements throughout the borough by liaising with the Metropolitan Police Counter Terrorism Security Advisors (CTSAs), Traffic Management Unit (TMU) and with the British Transport Police (BTP).	
2094	Mr Matthew Fletcher	Metropolitan Police Service	The reason for the request to remove "practices and principles" is that historically it has been problematic as to the understanding and application of this and has led to projects conducting their own interpretation. This in turn has resulted in higher levels of crime for newer developments than if advice had been followed from our unit. If this wording is still required, then it would be requested that a definition of practices and principles is included to remove the opportunity for misunderstanding how this is implemented. Practices and Principles of SBD is recognised as achieving certification by the Metropolitan Police Service due to its approach of considering the whole site and its specific needs. The addition of CTSAs, TMU and BTP consultation is to ensure that experts in these specific areas are consulted at the earliest opportunity to ensure appropriate, cost-effective and proportionate measures are introduced to protect users of the spaces.	The amendments suggested will be considered in preparing the Proposed Submission Local Plan.
2137	Anonymous letter		My suggestion is that every new building has a public artwork provided as part of the building. I have always found it extraordinary that when our country was poor, our buildings were very elegant, masterful and ornate. Now we are very rich, our buildings are poor, unimaginative and slapdash. We get not value for our £ £ £. You will go down in history as the one who created artworks for the future - paid for buy the building forms	Chapter 10 of the Draft Local Plan, Promoting Culture and Creativity, identifies the wide range of benefits that public art brings, including allowing everyone to have access to culture, creating a sense of place, encouraging footfall and supporting the visitor economy. As such, it is supported and encouraged. Part E of Policy 45 states that: <i>"The use of outside space and the public realm for art will be encouraged and supported in</i>

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			who put up the new builds in the area! Please put this forward as future policy on all new buildings across the UK. People will come from other countries to see our 'UK of Culture'.	<i>accessible areas and town centre locations."</i> Part G of the same policy states that <i>"Section 106 contributions will be sought for public art including:</i> <i>i) The funding, management, development, implementation and maintenance of public art projects which are not part of major development sites;</i> <i>ii) Financial contributions towards the provision of public art projects located outside the development site."</i>
2406	Ms Patricia Braga		Do you really believe that groundworks at Marlowe Road is an example of good eco landscaping? What input has DEFRA? What validity is there to take out mature trees?	The Draft Local Plan does not make reference to groundworks at Marlowe Road. DEFRA does not usually comment on local plans or planning applications. The Environment Agency (who report to the Ministry of Housing, Communities and Local Government) is a Statutory Consultee however. As such, they have been consulted on the Local Plan. They are also consulted on all Major planning applications in Flood Zones 2 or 3, or in Flood Zone 1 where critical drainage problems have been identified. They are also consulted on planning applications where the development is proposed on potentially contaminated land which may pollute controlled waters. Natural England and the Conservators of Epping Forest have been consulted on the Local Plan, and are also consulted on planning applications where necessary. Section 198 of the Town and Country Planning Act (1990) gives us powers to make a Tree Preservation Order (TPO) to protect trees and woodlands, when it is expedient in the interests of amenity. A tree preservation order (TPO) bans the cutting down, lopping, topping, uprooting, wilful damage or destruction of tree(s) without the consent of the council. As set out under Part D of Policy 79, Conservation Areas, we will seek to preserve any tree which contributes to the character of a conservation area. For other trees, as set out under part G of Policy 86, Biodiversity

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				and Geodiversity, an arboricultural report must be submitted at the planning application stage for any development proposal that would impact on existing trees. The policy states that damage to trees and their loss should be avoided where possible. Where damage or loss cannot be avoided, mitigation and compensation measures should be proposed and implemented. Policy G7, Trees and Woodlands, of the Draft New London Plan states that development proposals should ensure that, wherever possible, existing trees of quality (Category A and B as defined by British Standard 5837:2012) are retained. If it is imperative that trees must be removed, there should be adequate replacement based on the existing value of the benefits of the trees removed.
2486	London Hotel Group	London Hotel Group	We note that the Council's Policies 62 and 63 seek to ensure that high quality design should be at the forefront of the approach to development proposals, and that appropriate intensification should take place in accordance with Policy 5, and that taller buildings will be assessed in line with the Characterisation and Intensification Study. In the first instance, Policy 5 (A - H) includes a series of other criteria that mixed use development should be considered alongside criteria I - K	Comment noted.
2629	Ms Kate Bundock		Design of new buildings is important. Present designs are ugly and depressing to look at.	The Council agrees that the design of buildings is important. Policy 62 Delivering High-Quality Design aims to ensure the delivery of High-Quality Design in the borough. Waltham Forest has a well-established design review panel that through tailored support for individual developments can ensure the delivery of high-quality design and place-making.
2795	Cllr Alan Siggers	Councillor	Policy 62, Section 14 of the plan starts with the phrase "to deliver high quality design, development proposals should". This must be changed to say "To deliver high-quality design, development proposals must". Planning policies need to be robust and definite in their purpose. This is not. The word	This point is noted for consideration.

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			"appropriate" appears far too often without any definition of what "appropriate" might be.	
2796	Cllr Alan Siggers	Councillor	Policy 63. Residents are concerned that there is no definition what "taller buildings" will mean. Residents are concerned that the strategic locations shown on the map at page 56 of the plan are too big and indistinct. It is held that larger, taller developments must be located in areas designated within the plan, be a maximum of five stories tall, but always take their cue from the surrounding architecture and exceed surrounding buildings by no more than one storey. No applications for "Taller Buildings" should be supported outside the Strategic Locations.	This point is noted for consideration. The Characterisation and Intensification Study (2019) has considered how new development could be accommodated at different locations throughout the Borough.
2893	Mr Roland Karthaus	member Architects E17	The commitment to good design is welcomed. However, in general the policy could be stronger, with a little more clarity and with more emphasis on the use of design review. Policy 63 - Include high quality materials and detailing which are attractive, durable and sustainable; Replace 'include' with 'use' - include suggests that only some of the materials should be high quality etc. Incorporate measures to 'design out crime' into development proposals following guidance from the 'Secured by Design' scheme. Replace 'incorporate' with 'consider' Secured by design measures are not appropriate in all circumstances and frequently contradict other areas of good design. For example tall, impermeable garden fences that create blank frontages. All should be considered as part of a good design process.	Suggested policy amendments are noted for inclusion in the next iteration of the Local Plan document - where this will provide better clarity and interpretation.

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Policy 63: Taller Buildings				
ID	Full Name	Organisation	Comment	Council (Officers) Response
36	Jennifer Johns		Very worried about tall buildings around station and along Station Road - not in keeping with area	Noted. The Local Plan does not allocate sites as this will be the subject of a Site Allocations document, which will be consulted on in 2020.
447	Mr Jeremy Clayden		The tall buildings policy says that taller buildings will be assessed against a list of criteria. However, this policy doesn't guarantee anything. If current developments at Blackhorse Road and Hale Wharf were assessed against these criteria why are they being built? For example, if the listed criteria 'Impact on the existing skyline' was considered, why is a 20 storey building being built in an area next to Walthamstow Wetland and the canal where there are no other buildings. The Hale Wharf development is visible for miles around, in every direction. If there was any consideration at the planning stage of its impact on public open spaces like Walthamstow Wetlands and Tottenham Marshes it made no difference to the outcome. The tall buildings currently being built at Blackhorse Road do wall-in and overshadow Walthamstow Wetlands. Why was this allowed? The policy does not regulate or constrain the current free-for-all planning approval process, where money takes precedence over social, culture and environmental considerations. The Local Plan should define some real, enforceable constraints to block taller buildings from being built next to public open spaces or in places where the areas cultural heritage would be destroyed.	This comment is noted. Policy 63 sets out Waltham Forest Council's approach to taller buildings. This policy includes a range of criteria aimed at the protection of watercourses, canals, landscapes landmarks and views which will be expanded in an updated Urban Design Supplementary Planning Document.
552	Wendy Holloway		I am concerned about the plan to put in more taller buildings. They would be inappropriate in Highams Park and even the idea of adding extra storeys could create shadow and loss of light for neighbouring buildings. it is difficult to report anti-social behaviour at night because the police say it is a Council matter but the Council noise nuisance line closes before 11pm time at which it is reasonable to start complaining.	The Local Plan is based on a character led approach to new development, which is set out in the Characterisation and Intensification Study and in Policy 5 Encouraging Mixed Use Development and Intensification. Any new tall building would also have to adhere to the criteria set out in Policy 62 Delivering High Quality Design and Policy 63 Taller Buildings. Where building heights need to be appropriate to the location in which they are proposed.

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644	Gordon Turpin	Highams Park Planning Group	Lea Bridge and Church Road, Walthamstow Town Centre: Development should be a maximum of five stories in the district centre.	Building heights need to be appropriate to the location in which they are proposed. Where appropriate, taller buildings can help to optimise the use of land and assist in accommodating the borough's anticipated growth. To inform policy development and manage growth and change in local areas, Waltham Forest Council commissioned a Characterisation and Intensification Study, which is available on our website. This has informed the emerging Local Plan and will be used in assessing planning applications when they are submitted. The Council has also started work on a Strategic Site Allocations Development Plan Document, which will complement the emerging Local Plan Policies. This document will identify strategic development sites and provide details on their existing context. It will then go on to set out preferred use(s), parameters for building heights, potential access arrangements and other key planning considerations for development proposals. In preparing this additional document, officers will engage with local resident/community groups.
736	Mr. Gordon Turpin		Lea Bridge and Church Road, Walthamstow Town Centre, Development should be a maximum of five stories in the district centre.,Highams Park	Building heights need to be appropriate to the location in which they are proposed. Where appropriate, taller buildings can help to optimise the use of land and assist in accommodating the borough's anticipated growth. To inform policy development and manage growth and change in local areas, Waltham Forest Council commissioned a Characterisation and Intensification Study, which is available on our website. This has informed the emerging Local Plan and will be used in assessing planning applications when they are submitted. The Council has also started work on a Strategic Site Allocations Development Plan Document, which will complement the emerging Local Plan Policies. This document will identify strategic development sites and provide details on their existing context. It will then go on to set out preferred use(s), parameters for building heights,

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				potential access arrangements and other key planning considerations for development proposals. In preparing this additional document, officers will engage with local resident/community groups.
836	Ms Tessa Craig		We are pleased to see the impact of over-shadowing buildings on canals is recognised in the section (point h). Overshadowing can impact of the attractiveness of canals as places to spend time as well as biodiversity, as the reduced light and cooler temperatures may limit the population growth of phytoplankton and macroplankton food sources in the shaded areas, which could affect fish populations and in turn bird populations It can also prevent solar panels on boats from charging effectively, reducing the amount of renewable energy that they can generate.	Support for this policy is noted and we will be considering further guidance on overshadowing as part of the Urban Design SPD and masterplanning work. The Council is working on a Biodiversity Strategy which will set out how we protect and enhance existing species in the borough.
862	Mr Roger Brown	Chair Love North Chingford	Inappropriate building heights: at meetings and in the draft there was a refusal to contemplate guideline building heights in N. Chingford centre, where no building in Station Road is higher than three storeys. This should remain the limit, particularly at the sensitive Forest edge. The observation that this area near the bus station is scruffy is no justification for high buildings over, or over development.	The Council is committed to the promotion of exemplary design in new development. Following on from Waltham Forest Council's Characterisation and Intensification Study, we will be considering further guidance on building heights as part of the Site Allocations DPD and masterplanning work. Building heights need to be appropriate to the location in which they are proposed. Where appropriate, taller buildings can help to optimise the use of land and assist in accommodating the borough's anticipated growth. To inform policy development and manage growth and change in local areas, the Council commissioned a Characterisation and Intensification Study, which is available on our website. This has informed the emerging Local Plan and will be used in assessing planning applications when they are submitted. The Council has also started work on a Strategic Site Allocations Development Plan Document, which will complement the emerging Local Plan Policies. This document will identify strategic development sites and provide details on their existing context. It will then go on

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				to set out preferred use(s), parameters for building heights, potential access arrangements and other key planning considerations for development proposals. In preparing this additional document, officers will engage with local resident/community groups.
935	Mr Mathew Frith		We support this, but recommend Part J should also include reference to bird/bat strike and light pollution especially close to Sites of Importance for Nature Conservation.	Comment is noted and the policy will be amended to include mitigation as appropriate. Support noted. The revision Policy 63, Part J, to include appropriate mitigation measures relating to bird/bat strikes and light pollution will be considered in drafting the Proposed Submission Local Plan. Redraft part H of Policy 63 as follows: "Inclusion of appropriate measures to mitigate adverse environmental impacts in relation to wind movement, solar glare, shadowing, microclimatic conditions, air, noise and light pollution and bird and bat strikes."
1087	Mr Tim Brennan	Historic England	We note the draft Plan does not define what is to be regarded as tall (or 'taller' as included in the draft Plan at several points) in the context of the existing built environment of the borough. While we note that several locations are not sensitive in heritage terms, we consider there remains the potential for adverse impacts in some cases on heritage assets in the absence of clear guidance on building heights (notwithstanding the brief reference within the Characterisation and Intensification Study). We would refer to the NPPF's requirement at para 16 that policies should be clear and unambiguous so that it is evident how decision-makers should react. Further, the draft London Plan is clear that local plans should define what is to be regarded as a tall building. We consider this part of the draft Plan requires further consideration.	The Council is committed to the promotion of exemplary design in new development. Following on from the Council's Characterisation and Intensification Study, we will be considering further guidance on building heights as part of the Site Allocations DPD and masterplanning work. The Council commissioned a Characterisation and Intensification Study to inform policy development and manage growth and change in local areas. This is available on our website. The study takes a carefully nuanced approach to the determination of appropriate building heights across the borough, in response to the significant variations in character and sensitivity to growth and intensification. This is communicated in the Draft Local Plan through Policy 5, Encouraging Mixed Use Development and Intensification, which requires an approach to intensification and density based on 'reinforcement', 'transition' or 'transformation'. Table 4.1 sets out the Floor Area Ratio likely to be appropriate for each, which in turn, will inform appropriate building heights. Policy 5 also states that

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				development proposals must consider the impact on existing heritage assets, including key criteria as set out in Historic England/ Design Council CABE guidance documents. The Council has also started work on a Strategic Site Allocations Development Plan Document, which will complement the emerging Local Plan Policies. This document will identify strategic development sites and provide details on their existing context. It will then go on to set out preferred use(s), parameters for building heights, potential access arrangements and other key planning considerations for development proposals. In preparing this additional document, officers will engage with local resident/community groups.
1137	Stagecoach		While Stagecoach agree with the criteria based assessment of development for taller buildings, they suggest that more detail could be included within the Draft Local Plan to identify areas that could potentially accommodate taller buildings, particularly within the Strategic Locations.	Support noted. The Council has started work on a Strategic Site Allocations Development Plan Document, which will complement the emerging Local Plan Policies. This document will identify strategic development sites and provide details on their existing context. It will then go on to set out preferred use(s), parameters for building heights, potential access arrangements and other key planning considerations for development proposals. In preparing this additional document, officers will engage with local resident/community groups.
1182	Mrs Jean Turpin		I have serious concerns regarding over-densification of development in the Highams Park area. Whilst I appreciate the need to provide homes for the growing population, house building should be appropriate and not change the light suburban feel of Highams Park. The allowable density of development outside of the district centre is much too high and will lead to substantial changes in the character of the area, which is contrary to the stated vision of the draft Local Plan Development outside of the District Centre should restrict density of development to a maximum of 50% of what is currently proposed so as to provide lower density houses (not	Building heights need to be appropriate to the location in which they are proposed. Where appropriate, taller buildings can help to optimise the use of land and assist in accommodating the borough's anticipated growth. To inform policy development and manage growth and change in local areas, Waltham Forest Council commissioned a Characterisation and Intensification Study, which is available on our website. This has informed the emerging Local Plan and will be used in assessing planning applications when they are submitted. The Council has also started work on a Strategic Site Allocations Development Plan Document, which will complement the emerging Local Plan

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			flats) suitable for families. Housing in the District Centre should be restricted to a maximum of five storeys. Outside of the District Centre there should be a height limit of four storeys.	Policies. This document will identify strategic development sites and provide details on their existing context. It will then go on to set out preferred use(s), parameters for building heights, potential access arrangements and other key planning considerations for development proposals. In preparing this additional document, officers will engage with local resident/community groups.
1249	Rosie Sterry	Transport for London - Commercial Development	TfL CD strongly agrees that development proposals including taller buildings should be assessed against their proximity to transport interchanges and nearby facilities such as shops, community facilities and other services	Support for this policy is noted. Following on from Waltham Forest Council's Characterisation and Intensification Study, we will be considering further guidance on building heights as part of the Site Allocations DPD and masterplanning work.
1251	Rosie Sterry	Transport for London - Commercial Development	Part (e) is also supported; in appropriate areas taller buildings can assist with wayfinding, particularly in relation to transport interchanges.	Support for this policy is noted. Following on from Waltham Forest Council's Characterisation and Intensification Study, we will be considering further guidance on appropriate intensification and density in development as part of the Site Allocations DPD and masterplanning work.
1252	Rosie Sterry	Transport for London - Commercial Development	We suggest that the policy is more explicit in focusing taller buildings in the most accessible locations to ensure that they are sustainably developed.	The Council is committed to the promotion of exemplary design in new development. Following on from Waltham Forest Council's Characterisation and Intensification Study, we will be considering further guidance on building heights as part of the Site Allocations DPD and masterplanning work. Policy 5, Encouraging Mixed Use Development and Intensification, sets out the approach to intensification of development. It is explicitly stated here that 'Transformation' will be suitable in strategic locations with high public transport accessibility and significant other planned infrastructure investment. The Council has also started work on a Strategic Site Allocations Development Plan Document, which will complement the emerging Local Plan Policies. This document will identify strategic development sites and provide details on their existing context. It will then go on to set out preferred use(s), parameters for building heights, potential access arrangements

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				and other key planning considerations for development proposals. In preparing this additional document, officers will engage with local resident/community groups.
1395	Jennefer Peters	Senior Strategic Planner, London Plan Team Greater London Authority	WF should define what constitutes a 'tall building' in specific and identified localities in their area. Appropriate locations for tall buildings should also be identified and illustrated on maps in accordance with draft new London Plan Policy H8.	The Council commissioned the Characterisation and Intensification Study to inform policy development and manage growth and change in local areas. This is available on our website. The study takes a carefully nuanced approach to the determination of appropriate building heights across the borough, in response to the significant variations in character and sensitivity to growth and intensification. This is communicated in the Draft Local Plan through Policy 5, Encouraging Mixed Use Development and Intensification, which requires an approach to intensification and density based on 'reinforcement', 'transition' or 'transformation'. Table 4.1 sets out the Floor Area Ratio likely to be appropriate for each, which in turn, will inform appropriate building heights. Policy 5 also states that development proposals must consider the impact on existing heritage assets, including key criteria as set out in Historic England/ Design Council CABE guidance documents. The Council has also started work on a Strategic Site Allocations Development Plan Document, which will complement the emerging Local Plan Policies. This document will identify strategic development sites and provide details on their existing context. It will then go on to set out preferred use(s), parameters for building heights, potential access arrangements and other key planning considerations for development proposals. In preparing this additional document, officers will engage with local resident/community groups.
1505	Helen Monger	London Parks and Gardens Trust	Policies should ensure that significantly taller buildings do not have a damaging effect on the design or the experience of being within public green spaces.	This policy has been amended to include consideration of the potential impact of taller development on public parks and gardens. Part F of Policy 63 states that taller buildings will be assessed against their impact on the quality of public realm at

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				ground level and Part H states that taller buildings will be assessed against the prevention of overshadowing of surrounding public open space. Policy 86 also provides further detailed requirements relating to biodiversity and geodiversity.
1506	Helen Monger	London Parks and Gardens Trust	Objection to Policy 63 C Amend as follows - C Impact on local heritage assets, including conservation areas and listed or locally listed buildings, parks and gardens.	The objection to this policy is noted and it has been amended. Part C of Policy 63 will be amended as follows: "Impact on local heritage assets, including conservation areas and listed or locally listed buildings, parks and gardens." In the Proposed Submission Local Plan. Although Waltham Forest does not currently have any listed or locally listed parks and gardens (with exception of a small part of Wanstead Park), amending the policy as recommended would allow for this to happen in the future.
1507	Helen Monger	London Parks and Gardens Trust	Support Policy 63 I	Support for this policy is noted.
1529	Ms Mary Manuel		The policy makes no reference to the design of tall buildings, public buildings and structures to minimise suicide risk. Either clause J or K could be expanded to refer to good lighting, and measures to minimise risk of suicide.	The Council is considering further guidance on development design as part of the Urban Design SPD, Site Allocations DPD and masterplanning work. Mental health and well-being is an important priority for Waltham Forest, as set out in the Waltham Forest Health and Wellbeing Strategy (2016-2020) and the Waltham Forest Mental Wellbeing Strategy (2018-2021). The latter highlights "Five Ways to Well-being", which the Draft Local Plan captures in Chapter 13, Promoting Health and Well-being. The five key determinants of mental ill-health are: economic wellbeing including poverty; employment and workplace; housing and homelessness; social capital and social isolation; and access to green space and the natural environment. The Local Plan addresses the impact of social, physical and economic environment on residents' health. The Local Plan adopts a 'health in all policies' approach, and we will

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				<p>continue to work with partners across the Council, NHS, voluntary sector and beyond to reduce and mitigate the impacts of the determinants identified above on mental health and wellbeing. The inclusion of specific suicide prevention measures will be considered in preparing the Proposed Submission Local Plan.</p> <p>It is proposed to include a separate policy on Community/Public Safety to promote safer places - taking into account issues associated with personal and community safety, security in the design and layout of development, crime prevention; fear of crime; and others.</p>
1570	Mr Tim Madelin	Associate Director of Estates (Strategic) NHS North East London Commissioning Alliance	The policy makes no reference to the design of tall buildings, public buildings and structures to minimise suicide risk. Either clause J or K could be expanded to refer to good lighting, and measures to minimise risk of suicide.	<p>The Council is considering further guidance on development design as part of the Urban Design SPD, Site Allocations DPD and masterplanning work. Mental health and well-being is an important priority for Waltham Forest, as set out in the Waltham Forest Health and Wellbeing Strategy (2016-2020) and the Waltham Forest Mental Wellbeing Strategy 2018-2021. The latter highlights “Five Ways to Wellbeing”, which the Draft Local Plan captures in Chapter 13, Promoting Health and Well-being. The five key determinants of mental ill-health are:</p> <ul style="list-style-type: none"> • Economic wellbeing including poverty; • Employment and workplace; • Housing and homelessness; • Social capital and social isolation; and • Access to green space and the natural environment <p>The Local Plan addresses the impact of social, physical and economic environment on residents’ health. The Local Plan adopts a ‘health in all policies’ approach, and we will continue to work with partners across the Council, NHS, voluntary sector</p>

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				and beyond to reduce and mitigate the impacts of the determinants identified above on mental health and wellbeing. The inclusion of specific suicide prevention measures will be considered in preparing the Proposed Submission Local Plan. See Preventing Suicides in Public Places (2015).
1629	Bob Bennet		The policy as drafted only takes into account the physical impact of taller buildings, but consideration should also be given as whether such a residential tall building will be satisfactory accommodation for the occupiers.	Chapter 8, 'Decent Homes for Everyone', sets out the Local Plan expectations for housing design and quality. This should be read in conjunction with Waltham Forest's Housing Strategy 2019-2024 'Housing Futures: A Decent Roof for All', the London Plan (Policy D4 of the Draft New London Plan) and the Mayor's Housing Supplementary Planning Guidance (SPG). All new homes, including those in tall buildings, will be expected to meet these standards to ensure high-quality accommodation for all.
1664	Mrs Gillian Poulter		I have many concerns regarding the scale, and insinuated redevelopment proposals. There seems an emphasis on keeping the character of each of the areas, and yet the possible outcome of your document, particularly in the Highams Park are of the Northern Plan would completely change the community that currently flourishes there and the overall character of what is a unique town centre.	Building heights need to be appropriate to the location in which they are proposed. Where appropriate, taller buildings can help to optimise the use of land and assist in accommodating the borough's anticipated growth. To inform policy development and manage growth and change in local areas, Waltham Forest Council commissioned a Characterisation and Intensification Study, which is available on our website. This has informed the emerging Local Plan and will be used in assessing planning applications when they are submitted. The Council has also started work on a Strategic Site Allocations Development Plan Document, which will complement the emerging Local Plan Policies. This document will identify strategic development sites and provide details on their existing context. It will then go on to set out preferred use(s), parameters for building heights, potential access arrangements and other key planning considerations for development proposals. In preparing this additional document, officers will engage with local resident/community groups.

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1666	Mrs Gillian Poulter		I also worry that the desire is to build upward above current levels of development and allow putting several development blocks on small areas of land, with no inbuilt recreational areas for the families.	Building heights need to be appropriate to the location in which they are proposed. Where appropriate, taller buildings can help to optimise the use of land and assist in accommodating the borough's anticipated growth. Policy 27 of the Draft Local Plan sets out the requirements for external space to be delivered with new homes, including private amenity space, communal space and children's play space.
1825	Robert Tatam		Policies 60, 61 and 63 require targets to be meaningful.	Any specific targets set at this time could become obsolete during the Plan Period. It is therefore appropriate to allow a degree of flexibility and expect planning applications to meet and/or exceed appropriate standards or targets at the time of submission. Where necessary, Waltham Forest Council will develop supplementary planning guidance to cover specific issues, themes or locations and provide further detail on policies in the Local Plan itself.
1864	Mike Chrimes		Policy 75-tall buildings need to be designed. There is a US based Council on tall buildings and the urban habitat that provides useful information and both the institution of Civil Engineers, institution fo Structural Engineers and RIBA provide advice documents for their members. Something must be said about post Grenfell fire regulations and an awareness that building regulations are likely to change and the council needs to work with other authorities to improve standard of existing buildings where necessary. The Council's experience of tall builds has not been good with many from the post war period now demolished. Then and now there was a pursuit of units over medium term social impact, with little attempt to determine who would be living in tall buildings in the medium term. The policy needs to be explicitly tied in with the table in the housing section that identifies housing need and mix.	<p>Advice from the Council on Tall Building and Urban Habitat, Institute of Civil Engineers, Institute for Structural Engineers and RIBA will be considered in preparing the Proposed Submission Local Plan.</p> <p>In relation to fire regulations, Part K of Policy 63, Taller Buildings, in the Draft Local Pan requires applications for tall buildings to be assessed against proposed safe and accessible evacuation routes for all in the event of an emergency. Policy D11 of the Draft New London Plan requires development proposals to achieve the highest standards of fire safety and ensure that they:</p> <ol style="list-style-type: none"> 1. Are designed to incorporate appropriate features which reduce the risk to life in the event of a fire 2. Are constructed in an appropriate way to minimise the risk of fire spread

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				<ol style="list-style-type: none"> 3. Provide suitable and convenient means of escape for all building users 4. Adopt a robust strategy for evacuation which all building users can have confidence in 5. Provide suitable access and equipment for firefighting which is appropriate for the size and use of the development. <p>In order to comply with Draft London Plan Policy D11, all major development proposals must submit a Fire Statement, consisting of an independent fire strategy produced by a third party, suitable qualified assessor.</p>
1955	Mr Stephen Kelliher		The council has refused to be drawn on the building height of any of the proposed developments yet North Chingford is a low-rise town. No one wants to see taller buildings created since these would ruin the fabric of the high street, existing homes and the gateway to the forest.	<p>Building heights need to be appropriate to the location in which they are proposed. Where appropriate, taller buildings can help to optimise the use of land and assist in accommodating the borough's anticipated growth. To inform policy development and manage growth and change in local areas, Waltham Forest Council commissioned a Characterisation and Intensification Study, which is available on our website. This has informed the emerging Local Plan and will be used in assessing planning applications when they are submitted. The Council has also started work on a Strategic Site Allocations Development Plan Document, which will complement the emerging Local Plan Policies. This document will identify strategic development sites and provide details on their existing context. It will then go on to set out preferred use(s), parameters for building heights, potential access arrangements and other key planning considerations for development proposals. In preparing this additional document, officers will engage with local resident/community groups.</p>

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2033	Peter Drew		How do shoulder heights fit in with roofing of existing buildings? Is there a presumption in favour of retaining distinct character and views?	<p>Shoulder heights are not referred to in the draft Local Plan, but are discussed in the Characterisation and Intensification Study commissioned by the council and available on our website. The study takes a carefully nuanced approach to the determination of appropriate building heights across the borough, in response to the significant variations in character and sensitivity to growth and intensification. The creation of appropriate shoulder heights and the response to existing rooflines will be considered on a case-by-case basis.</p> <p>Policy 62 of the Draft Local Plan clearly sets out the importance of responding to the character of development proposals. This includes requirements for development proposals to:</p> <ul style="list-style-type: none"> • Reinforce and/or enhance local character and distinctiveness, taking account of patterns of development, urban form and grain, building typology, architecture, materials, trees and landscaping and other features of local and historical significance • Respond to their context in terms of scale, height and massing • Be visually attractive, with architecture and landscaping that respects its context without unduly restricting style and encouraging innovation <p>Further detailed guidance on achieving design quality can be found in the Council's Urban Design SPD. It is also important to note that we have in place a well-established, independent design review process.</p> <p>There are no views with statutory protection in Waltham Forest. The Waltham Forest Urban Design SPD however, does</p>

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				<p>identify that important views into or from development sites, important buildings or landmarks are key elements to be considered during the production of development proposals. This is reinforced in Appendix 2 of the SPD, - the Site Assessment Checklist. The SPD also sets out that the scale, height and massing of proposals should be considered against its potential impact on the skyline and local views.</p> <p>Within Conservation Areas, important views are identified within the Appraisal Management Plans, which are also available on our website.</p>
2073	Mike Sparrow		<p>When one wades through all of the jargon the real hidden agenda is of course discovered. The penultimate paragraph mentions that you wish to build 'taller buildings' (which some might describe as tower blocks) and 'higher densities' which presumably means a lot more housing and people) around this area. Having read through this a few times and it does take a few times, I conclude that this is the main point of your agenda, i.e. to build flats, tower blocks and housing estates around Sewardstone Road and other parts of Chingford. However, the pamphlet and its' wording clearly appear designed to not fully reflect and describe this to the residents. Your written plans for this area should have made your objectives very clear to residents, otherwise one can only presume it is a half-hidden, smoke and mirrors, politicised type agenda.</p>	<p>There is no hidden agenda behind the Local Plan. The Council's five strategic priorities for development of the borough over the next 15 years are clearly set out on page 10. These are:</p> <ol style="list-style-type: none"> 1. Increasing housing density. Creating liveable places 2. Ensuring growth is sustainable and supported by infrastructure 3. Building on the unique strengths of the borough and carrying forward its cultural legacy 4. Promoting the economy to improve the life chances of all residents, students and workers 5. Ensuring land optimisation and driving investment. <p>These five principles are treated as "golden threads" that run throughout the document.</p> <p>The Local Plan must be consistent with the NPPF and the London Plan. At the heart of the NPPF is a presumption in favour of sustainable development, which is expected to underpin plan making. The NPPF also states that local plans must meet the objectively assessed need for homes and jobs in</p>

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				<p>their area. The amount of growth necessary to ensure that Waltham Forest carers for the objectively assessed needs of current and future residents and businesses up to 2035 has been established from London Plan targets and through background evidence base studies.</p> <p>Building heights need to be appropriate to the location in which they are proposed. Where appropriate, taller buildings can help to optimise the use of land and assist in accommodating the borough's anticipated growth.</p> <p>To inform policy development and manage growth and change in local areas, the Council commissioned a Characterisation and Intensification Study, which is available on our website. This has informed the emerging Local Plan and will be used in assessing planning applications when they are submitted.</p> <p>The Council has also started work on a Strategic Site Allocations Development Plan Document, which will complement the emerging Local Plan Policies. This document will identify strategic development sites and provide details on their existing context. It will then go on to set out preferred use(s), parameters for building heights, potential access arrangements and other key planning considerations for development proposals. In preparing this additional document, officers will engage with local resident/community groups.</p>
2086	Mike Sparrow		You mention 'sensitively' designed taller buildings, or tower blocks as some would describe them. I have seen one of your 'sensitively designed' buildings go up in King's Head Hill, Alana Heights I believe it is called. It looks awful, the cheapest possible bricks which do not match any other local buildings were obviously used, the size and shape of it are not appealing	Building heights need to be appropriate to the location in which they are proposed. Where appropriate, taller buildings can help to optimise the use of land and assist in accommodating the Borough's anticipated growth.

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			<p>to the eye and the use of grey guttering, windows and fencing helps finish off the look as very much like one of Her Majesty's prisons. The building menacingly hangs over the back gardens of so many bungalows. There is nothing 'sensitive' about it what so ever. Why would anyone in their right mind want, trust or desire the council to do anymore building in this area. I really do not know how this council had the temerity to allow that monstrosity to be built in the first place. If you ask anyone in this area whether they would like some sensitively built, tall buildings opposite them along Sewardstone Road, the answer will I am sure be a resounding NO. You will also build 'Estates' that always end up as areas for drugs and criminal activity. This sort of building/housing never ends well you must surely recognise this. And whether or not you have 'open meetings' and opportunities to write in, you know and in all likely-hood hope that most people do not bother. People are often too busy, wrapped up in their own concerns or worries of life, elderly parents, young children etc., only a few will write in and complain and hurriedly as I am. But that doesn't mean you should be allowed to get away with it and I shall be writing to my MP to complain about this awful pamphlet and the hidden agendas contained therein.</p>	<p>To inform policy development and manage growth and change in local areas, the Council commissioned a Characterisation and Intensification Study, which is available on our website. This has informed the emerging Local Plan and will be used in assessing planning applications when they are submitted.</p> <p>The Council has also started work on a Strategic Site Allocations Development Plan Document, which will complement the emerging Local Plan Policies. This document will identify strategic development sites and provide details on their existing context. It will then go on to set out preferred use(s), parameters for building heights, potential access arrangements and other key planning considerations for development proposals. In preparing this additional document, officers will engage with local resident/community groups.</p> <p>Policy 62 of the Draft Local Plan sets out detailed requirements in order to ensure high quality design, including "be visually attractive, with architecture and landscaping that respects its context without unduly restricting style and encouraging innovation". The Draft Local Plan goes on to set out other measures by which high quality design will be achieved, including the use of our well-established, independent, expert design review process.</p> <p>Further detailed guidance on achieving design quality can be found in the Council's Urban Design SPD. It is also important to note that we have in place a well-established, independent design review process.</p> <p>In relation to concerns raised about criminal activity, Policy 65 of the Draft Local Plan addresses the principle of designing out</p>

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Policy 63: Taller Buildings				
ID	Full Name	Organisation	Comment	Council (Officers) Response
				crime. As explained, ensuring that the Borough is safe is a priority for Waltham Forest.
2319	Mr Tim Madelin	Associate Director of Estates (Strategic) NHS North East London Commissioning Alliance	The policy makes no reference to the design of tall buildings, public buildings and structures to minimise suicide risk. Either clause J or K could be expanded to refer to good lighting, and measures to minimise risk of suicide.	<p>Mental health and well-being are important priorities for Waltham Forest, as set out in the Waltham Forest Health and Wellbeing Strategy (2016-2020) and the Waltham Forest Mental Wellbeing Strategy (2018-2021). The latter highlights "Five Ways to Wellbeing", which the Draft Local Plan captures in Chapter 13, Promoting Health and Well-being. The five key determinants of mental ill-health are:</p> <ul style="list-style-type: none"> - Economic wellbeing including poverty; - Employment and workplace; - Housing and homelessness; - Social capital and social isolation; and - Access to green space and the natural environment <p>The Local Plan addresses the impact of social, physical and economic environment on residents' health. The Local Plan adopts a 'health in all policies' approach, and we will continue to work with partners across the Council, NHS, voluntary sector and beyond to reduce and mitigate the impacts of the determinants identified above on mental health and wellbeing.</p> <p>The inclusion of specific suicide prevention measures will be considered in preparing the Proposed Submission Local Plan.</p>
2365	Sue Wildridge		This is a predominately residential area, and proposals to build tall housing (4-6 Stories) will impact badly on existing homes. The area around the Midland Road Arches is a disgrace.	Building heights need to be appropriate to the location in which they are proposed. Where appropriate, taller buildings can help to optimise the use of land and assist in accommodating the borough's anticipated growth. To inform policy development and manage growth and change in local areas, Waltham Forest Council commissioned a Characterisation and Intensification

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Policy 63: Taller Buildings				
ID	Full Name	Organisation	Comment	Council (Officers) Response
				Study, which is available on our website. This has informed the emerging Local Plan and will be used in assessing planning applications when they are submitted. The Council has also started work on a Strategic Site Allocations Development Plan Document, which will complement the emerging Local Plan Policies. This document will identify strategic development sites and provide details on their existing context. It will then go on to set out preferred use(s), parameters for building heights, potential access arrangements and other key planning considerations for development proposals. In preparing this additional document, officers will engage with local resident/community groups.
2374	Sue Wildridge		I am unhappy about the proposals to put high buildings (4-6 Stories around Leyton (Midland Road) Especially off Hainault Road and along Norlington Road. This would be oppressive in an area of 2 story houses. It would significantly affect the light in houses close by and in their gardens. In a densely developed area, people need to enjoy the little outdoor space that they have and removing sunlight from gardens would impact on them mental health of existing residents. 3 story development in the area should be the limit. This would provide decent homes for new and existing residents.	Building heights need to be appropriate to the location in which they are proposed. Where appropriate, taller buildings can help to optimise the use of land and assist in accommodating the borough's anticipated growth. To inform policy development and manage growth and change in local areas, Waltham Forest Council commissioned a Characterisation and Intensification Study, which is available on our website. This has informed the emerging Local Plan and will be used in assessing planning applications when they are submitted. The Council has also started work on a Strategic Site Allocations Development Plan Document, which will complement the emerging Local Plan Policies. This document will identify strategic development sites and provide details on their existing context. It will then go on to set out preferred use(s), parameters for building heights, potential access arrangements and other key planning considerations for development proposals. In preparing this additional document, officers will engage with local resident/community groups. Policy 64 of the Draft Local Plan requires new development to respect the amenity of existing occupiers and neighbours by avoiding adverse impacts through

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Policy 63: Taller Buildings				
ID	Full Name	Organisation	Comment	Council (Officers) Response
				the loss of daylight/sunlight (amongst other considerations). Ensuring high standards in the protection of the amenity of neighbours is critical to delivering sustainable growth across the borough.
2417	Mr Roger Brown	Chair Love North Chingford	Building Height limited to 3 floors: There seems complete agreement here, with which we strongly concur, that a building height limit of three floors be included throughout the District Centre to the Forest, (in line with the whole of Station Road now). This is required to ensure the town centre character is retained, and the transition into the internationally important Forest area enhanced. This is a unique difference to other town centres.	Policy 87 of the Draft Local Plan states clearly that proposals which would affect Epping Forest must be sensitive and proportionate, delivering enhancements where possible. It is also clear that development proposals must not contribute to adverse impacts on the forest's ecological integrity, amenity or visitor enjoyment. Building heights need to be appropriate to the location in which they are proposed. Where appropriate, taller buildings can help to optimise the use of land and assist in accommodating the borough's anticipated growth. To inform policy development and manage growth and change in local areas, Waltham Forest Council commissioned a Characterisation and Intensification Study, which is available on our website. This has informed the emerging Local Plan and will be used in assessing planning applications when they are submitted. The Council has also started work on a Strategic Site Allocations Development Plan Document, which will complement the emerging Local Plan Policies. This document will identify strategic development sites and provide details on their existing context. It will then go on to set out preferred use(s), parameters for building heights, potential access arrangements and other key planning considerations for development proposals. In preparing this additional document, officers will engage with local resident/community groups.
2487	London Hotel Group	London Hotel Group	We note that the Council's Policies 62 and 63 seek to ensure that high quality design should be at the forefront of the approach to development proposals, and that appropriate intensification should take place in accordance with Policy 5, and that taller buildings will be assessed in line with the	Comment noted.

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Policy 63: Taller Buildings				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			Characterisation and Intensification Study. In the first instance, Policy 5 (A - H) includes a series of other criteria that mixed use development should be considered alongside criteria I - K	
2498	London Hotel Group	London Hotel Group	In combination, the assessment criteria with the stated Policy, and the criteria within the Study (which forms the evidence base for the stated Policy) will assist achieving the objectives of Policy 62 (A) - (R) 'Delivering High-Quality Design', whilst ensuring that taller buildings are correct for their location, in accordance with the criteria in Policy 63 (A) - (K). The approach adopted similarly complies with the objectives of the draft London Plan (2019), in seeking to build strong and inclusive communities (Policy GG1), and ensuring that development makes the best use of land (Policy GG2). A common thread therefore exist to the objectives of Chapter 11 of the NPPF (2019).	Comment noted.
2499	London Hotel Group	London Hotel Group	In respect of the compliance with the NPPF, Chapter 12 requires 'development plans to set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable'. We believe that the clarity provided by the Study as an Evidence Base document will provide the clear background to the above mentioned detailed design policies with the draft Local Plan.	Comment noted.
2545	Mrs Irena Souroup		Finally, I am concerned about the height of the developments we have seen so far, both at lea bridge and Blackhorse Road. they are obscene and change the character of the area for the worse. I believe they are not creating 'liveable neighbourhoods' but highrise rabbit hutches not fit for humans. There needs to be a specific statement about the maximum height of buildings. The excuse that there are already high buildings is NOT a justification for more. The council absolutely needs to put a strict height limit on new buildings. Between 5 and 12 storeys is more than enough.	Comment noted for consideration. It is recognised that intensification could be associated with concerns about new developments being seen as inappropriate to their context and by extension, destroying much of what people see as valuable in their daily living environments. However, well-managed intensification could provide positive benefits to improve the quality of local environments. The Local Plan contains a range of policies to guide the redevelopment of sites/areas whilst prioritising the protection of local character.

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Policy 63: Taller Buildings				
ID	Full Name	Organisation	Comment	Council (Officers) Response
2573	Anne Hamshaw		I understand the Council now wish to build tower blocks again. We appear to have taken down tower blocks and now building them again! From Walthamstow Central to James Street is an ideal example. They are built so close together, years ago they would be classed as slum buildings, as they overlook one another.	This point is noted. There have been great advances in design and construction techniques in the last 60 years. Policy 63 sets out the factors to be considered in determining new proposals for taller or high-rise buildings. These include a requirement for high quality design, architecture, materials and sustainable design and construction, better place-making and safety considerations.

Policy 64: Amenity				
ID	Full Name	Organisation	Comment	Council (Officers) Response
1865	Mike Chrimes		I am not sure that is the correct word. Sense of place is another term used in this context, existing built environment, or perhaps amenity value.	In planning, the word "amenity" is commonly used in this context. It is, however, a broad concept and not formally defined anywhere. The inclusion of a definition of "amenity" in the Glossary will be considered in preparing the Proposed Submission Local Plan.

Policy 65: Designing Out Crime				
ID	Full Name	Organisation	Comment	Council (Officers) Response
2092	Mr Matthew Fletcher	Metropolitan Police Service	We are also supportive of Policy 62 and specifically Policy 65 which relates to Designing Out Crime and the Secured by Design Scheme. However, we would urge the following amendments: A. Minimise opportunities for criminal behaviour by requiring all forms of new development to incorporate 'Designing out Crime' and apply for and achieve accreditation via the Secured by Design scheme; B. Co-ordinate land uses to minimise the likelihood of an increase in crime and disorder; C. Promote safer streets and public realm improvements throughout the Borough by liaising with the Metropolitan Police Counter Terrorism Security Advisors (CTSAs), Traffic Management Unit (TMU) and with the British Transport Police (BTP).	Support noted. The amendments suggested will be considered in preparing the Proposed Submission Local Plan.

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Policy 65: Designing Out Crime				
ID	Full Name	Organisation	Comment	Council (Officers) Response
2095	Mr Matthew Fletcher	Metropolitan Police Service	The reason for the request to remove “practices and principles” is that historically it has been problematic as to the understanding and application of this and has led to projects conducting their own interpretation. This in turn has resulted in higher levels of crime for newer developments than if advice had been followed from our unit. If this wording is still required, then it would be requested that a definition of practices and principles is included to remove the opportunity for misunderstanding how this is implemented. Practices and Principles of SBD is recognised as achieving certification by the Metropolitan Police Service due to its approach of considering the whole site and its specific needs. The addition of CTSA, TMU and BTP consultation is to ensure that experts in these specific areas are consulted at the earliest opportunity to ensure appropriate, cost-effective and proportionate measures are introduced to protect users of the spaces.	The amendments suggested will be considered in preparing the Proposed Submission Local Plan.

Chapter 15: Sustainable Transport and Infrastructure				
ID	Full Name	Organisation	Comment	Council (Officers) Response
169	Anthony Thorne		Chingford currently has a water supply which runs on Victorian infrastructure and it appears to be working to its maximum capacity and regularly breaks down due to the demands being placed on it	Comment is noted. Growth will be matched by supporting infrastructure provision.
171	Anthony Thorne		Again the infrastructure is old, possibly the majority being over a 100 years old, and the additional demand of new developments will eventually cause the system to fail probably at a most inconvenient time such as the middle of a cold snap	Comment noted
425	Mr P Heatherley		Housing developments should not be attempted until infrastructure improvements have been implemented. Some of the proposed housing is for areas with poor transport, especially at	Comment is noted. The Council will continue to work closely with TfL and London Overground in improving the existing transport network. This comment will be taken into

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Chapter 15: Sustainable Transport and Infrastructure				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			Sewardstone Road. Strongly agree. Thoroughly approve of planned walk/cycleway along eastern edge of reservoirs. This is much overdue.	consideration when preparing the Proposed Submission Local Plan and the Infrastructure Delivery Plan (IDP). Those will assess the existing and future need for infrastructures, providing an efficient transport network, GPs and schools which accommodate the increase in demand and developing genuine transport choices in order to deliver Liveable Neighbourhoods for all.
572	Mr David Smith		Highams Park need also be identified as gateway to the forest, as it intersects significantly with Epping Forest, and its my belief it should be treated in the same manner as North Chingford.	Comment is noted and it will be taken into consideration when preparing the Proposed Submission Local Plan.
573	Mr David Smith		Recent developments in Highams Park have left a significant impact on infrastructure, not excluding train services, doctor appointments, road traffic, and of course schooling, where a certain local school STILL have classes consisting of over 30 pupils. I feel a minimum of 450 additional homes is way too high, and will change the character of the area significantly, as well as bringing the town to a halt, as infrastructure is already at break point.	Comment is noted. The Council will continue to work closely with TfL and London Overground in improving the existing transport network. This comment will be taken into consideration when preparing the Proposed Submission Local Plan and the Infrastructure Delivery Plan (IDP). Those will assess the existing and future need for infrastructures, providing an efficient transport network, GPs and schools which accommodate the increase in demand and developing genuine transport choices in order to deliver Liveable Neighbourhoods for all.
579	Mr David Smith		Infrastructure - maybe of we were told of some exciting new infrastructure improvements first, then this would hold some weight for brownfield development, but as it stands, there is very little coming in the way of improvements.	Comment has been noted.
817	Freight Transport Association		lit is vital to recognise the difference between discretionary journeys made by a private car and essential journeys made by commercial vehicles delivering to and providing services to their customers.	Comment noted. The Council acknowledges the difference between journeys made by a private cars and commercial vehicles. The Local Plan has taken into consideration the rise of driven distance of Light Commercial Vehicles and HGVs. Policy 70 seeks to optimise and minimise the adverse impacts of deliveries, freight and servicing in the local environments.

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ID	Full Name	Organisation	Comment	Council (Officers) Response
892	Lauren Keeling	Planning Officer Essex County Council	No reference to connectivity to Essex and the UK Innovation Corridor. Give the importance of the corridor for future and existing economic growth and development this is disappointing. It is recommended that the LBWF engages with ECC to ensure that the emerging Local Plan can set out how surface access to Essex will be maintained, and where possible enhanced for the future living, working and investing community of LBWF.	Comment noted and the strengthening of document wording will be taken into consideration in preparing the Proposed Submission Local Plan. The Council will continue to work closely with the Essex County Council (ECC), neighbouring boroughs, councils and other relevant public sector bodies. The Council has undertaken the Duty to Cooperate meetings as part of the Local Plan consultation.
1076	Ms Alison Blom-Cooper	Planning Department Epping Forest District Council	Chapter 15 Sustainable Transport and Infrastructure. The Council strongly supports the general thrust of the policies contained in this Chapter, and in particular Policy 72 (Managing Vehicle Travel Traffic) and Policy 73 (Electric Vehicles). It would be helpful if Policy 70 (Deliveries, Freight and Servicing) included reference to avoiding using roads through the EFSAC including within the Epping Forest District administrative area in order to minimise impacts of traffic on the EFSAC in relation to air quality.	Noted. Support welcomed.
1193	Rachel Kercani		Highams Park station platform is already very crowded at rush hour, this will only increase - what provision is being considered? Plus when commuters leave the station it is already rather hectic. The potential for accidents will only increase as more people try to cross Larkshall Road, Winchester Road and The Avenue. How will this be prevented?	Noted. This is not a consideration for the Local Plan. However, upgrades to the station to enhance passenger flow may be considered at a later date.
1785	Wendy Mathers-Ford		There are environmental concerns too traffic in the area (particularly going down to the Billet) is particularly bad which affects air quality. The roads simply will not cope with an influx cars from new properties and public transport is already strained to breaking point at rush hour.	Comment is noted and it will be taken into consideration when preparing the Proposed Submission Local Plan and the Infrastructure Delivery Plan (IDP). Those will assess the existing and future need for infrastructures, providing an efficient transport network, accommodating the increase in demand and developing genuine transport choices in order to meet the borough's ambitions for air quality and local environment. The Council will continue to work closely with TfL in improving the existing transport network. Policies 72, 73 and 74 seek to

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ID	Full Name	Organisation	Comment	Council (Officers) Response
				ensure and improve timely, strategic and local infrastructure investment and delivery to support good sustainable growth, along with active and sustainable transport choice across the borough.
1800	Deborah Taylor		An additional 450 homes within half a mile of Highams Park station is far too many. Development on this scale would irreparably damage the character of the area, to a say nothing of the pressure on local schools, GP surgeries and the roads which are already heavily congested at peak times.	Comment noted and will be taken into consideration when preparing the Proposed Submission Local Plan. The Council acknowledges the need to increase the provision of both social and physical infrastructure. This comment is noted when preparing the Infrastructure Delivery Plan (IDP) that will assess the existing and future need for infrastructures such as Doctor and GP surgeries, transport networks, early years, primary and secondary school facilities in the borough. Policies 55, 69 and 72 seek to ensure and improve timely, strategic and local infrastructure investment and delivery to support good sustainable growth, along with active and sustainable transport choice across the borough.
1832	Mr John Hugill		There seems very little thought to the necessary infra-structure that should be put into effect before any new build should be considered, a lot of local services are already over stretched and there are many visible signs of this in the whole of the borough (e.g. continual water leaks, pot-holed roads, local health care over stretched and future planning for schools places with such a large increase in the population)	Comment noted and will be taken into consideration when preparing the Proposed Submission Local Plan. The Council acknowledges the need to increase the provision of both social and physical infrastructure. This comment is noted when preparing the Infrastructure Delivery Plan (IDP) that will assess the existing and future need for infrastructures such as Doctor and GP surgeries, transport networks, early years, primary and secondary school facilities in the borough. Policies 55, 57, 69 and 72 seek to ensure and improve timely, strategic and local infrastructure investment and delivery to support good sustainable growth, along with active and sustainable transport choice across the borough. The Council will continue to work closely with TfL and London Overground in improving the existing transport network.

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Chapter 15: Sustainable Transport and Infrastructure				
ID	Full Name	Organisation	Comment	Council (Officers) Response
1869	Miss Susan Murray		Where will their children go to school? Is there REALLY to be no parking for them? Can you assure us that you will put in place the things that a community needs in order to run smoothly? We will need more buses but the 48 has just been killed off.	Comment noted and it will be taken into consideration when preparing the Proposed Submission Local Plan. The Council acknowledges that increasing the housing delivery will have an impact on social and community infrastructure. Policies in Chapters 12 (Social and Community Infrastructure) and 15 (Sustainable transport and Infrastructure) seek to ensure and improve timely, strategic and local infrastructure investment and delivery to support good sustainable growth, along with active and sustainable transport choice across the borough. This comment is noted in preparing of the Infrastructure Delivery Plan (IDP) that will assess and the existing and future need for infrastructures such as Doctor and GP surgeries, transport networks, early years, primary and secondary school facilities in the borough. The Council will continue to work closely with TfL in improving the existing transport network.
2080	Mike Sparrow		When one reads between the lines and dissects the deliberately confusing specific wording, it is clear that the council views the Sewardstone Road junction area (and many other areas in Chingford) as a great place(s) to put lots of new housing in (i.e. Enhanced Neighbourhood Centres!). And to back up your argument you believe people will then be able to use Crossrail 2 in Edmonton.	Comment noted. The strengthening of policy wording will be taken into consideration when preparing the Proposed Submission Local Plan.
2535	Save our Suburbs Petition - supported by 662 signatures	Chingford & Woodford Green Conservatives	Require that supporting infrastructure be provided in advance of new development being occupied	Comment noted. The Council acknowledges that increasing the housing delivery will have an impact on social and community infrastructure. Policies in chapters 12 (Social and Community Infrastructure) and 15 (Sustainable transport and Infrastructure) seek to ensure and improve timely, strategic and local infrastructure investment and delivery to support good sustainable growth, along with active and sustainable transport choice across the borough. This comment is noted in preparing of the Infrastructure Delivery Plan (IDP) that will assess and the existing and future need for infrastructures such as Doctor and

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ID	Full Name	Organisation	Comment	Council (Officers) Response
				GP surgeries, transport networks, early years, primary and secondary school facilities in the borough. The Council will continue to work closely with TfL in improving the existing transport network.
2614	Mr Paul Witterick		<p>What I have the greatest concern with is transport in the other, whether that be by car, train, bus etc and, in the case of cars, parking congestion. Already, the lower part of Kings Head Hill gets very congested with moving vehicles unable to pass each due to the high number and size of parked vehicles on each side. Many of the vehicles belonging to staff of Motorpoint. You say you want to increase housing and working here but where do people park their cars? You would think I am a typical motorist but I, in fact, support greater use of public transport and the need to reduce parking to keep main roads like Kings Head Hill flowing. Even, today, the simple act of restricting parking on the even numbered side of the lower part of Kings Head Hill would make a massive improvement. I have seen a number of parked vehicles scraped and arguments along here as well as tailbacks of traffic across the traffic light junction which is all caused by the Council allowing inappropriate parking here. Notwithstanding the extra pollution generated by cars having to remain stationary whilst trying to get by parked cars. Considering there is an extra wide pavement that could be used to alleviate the problem right now or simply ban parking, I fail to understand why this major A road is left to languish in unnecessary congestion.</p>	<p>Noted, the Mayor's Transport Strategy and Waltham Forest Council's 2020 Vision for Transport have focused attention on reducing private car usage and promoting public transport, walking and cycling with the aim of reducing traffic congestion.</p>
2615	Mr Paul Witterick		<p>Now onto buses. I am a motorist but take every opportunity to use the buses and trains. On this note, and bearing in mind you wish to connect to communities outside the borough, I am astonished there is no TFL bus connecting us to Waltham Abbey. They send buses to many other parts of Essex and with the Local Plan wishing to increase population and jobs then how</p>	<p>Noted. The Mayor's Transport Strategy and Waltham Forest Council's 2020 Vision for Transport have focused attention on reducing private car usage and promoting public transport, walking and cycling with the aim of reducing traffic congestion and assist in making buses move around the borough more</p>

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ID	Full Name	Organisation	Comment	Council (Officers) Response
			do people commute to this town just 3 miles away without using cars. The 215 bus goes to the Lea Valley camp site in Essex so surely it isn't that hard to simply extend the route to, say, the Waltham Abbey Tesco or the roundabout prior to it. Plenty of room there. Indeed, there is a 379 bus, so empty so often, that just goes from Yardley lane to Chingford Station on a continuous loop. Surely you can consult with TFL to send this to Waltham Abbey as well. This bus is so regular that a short extension would bring nothing but benefits to both Waltham Abbey and our borough. I am aware of a great many people who would love to be able to get to Chingford railway station via a bus along Sewardstone Road and also a great many people who would love to be able to go the opposite direction to access the Lee canal, Lee Valley regional park, the Water centre, The Tescos and Lidl all in the Waltham Abbey area. Indeed, very many years a red bus did go to Waltham Abbey and beyond but short sightedness from the powers that be removed this. We are always lectured to by the powers that be to use public transport but then are not given the simple option to do so.	efficiently. Additional bus routes are continuously being investigated as part of the Local Plan work.
2616	Mr Paul Witterick		I do hope you will recognise the importance of providing connection out into Essex and the need to make sure roads are not overcrowded and congested in the forthcoming population and employment influx.	Noted. However, the Mayor's Transport Strategy and Waltham Forest Council's 2020 Vision for Transport has focused attention on reducing private car usage and promoting public transport, walking and cycling. The Council will look at how this part of the borough can connect to these in Essex and other neighbouring boroughs. The requirement for strategic road network for employment uses is noted and will be further explored in both the Spatial Strategy, Employment and Transport policies.
2689	Mr Peter Carey	Service Manager Air Quality & Environmental	Does the draft Local Plan consider the effects of transport noise fully, in particular that from road traffic? There are parts of the borough that are significantly affected by road traffic noise, particularly adjacent to the A12 and A406. Arising from the	Noted. Policy 59 High Quality Environment ensures that new developments are supported that minimise noise pollution. Supporting Paragraph 15.21 discusses noise emitted from road traffic, but there is no policy surrounding this.

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Chapter 15: Sustainable Transport and Infrastructure				
ID	Full Name	Organisation	Comment	Council (Officers) Response
		Protection London Borough of Waltham Forest	European Noise Directive (END) noise mapping process, there are a number of 'Important Areas' identified relating to road traffic, which are those with the highest levels of exposure to road noise. The current Core Strategy does reference the issues arising from transport noise at paragraphs 16.9-16.11, but these paragraphs are not replicated in the draft Local Plan. More information about END noise mapping can be found here: http://www.extrium.co.uk/noiseviewer.html	
2911	Barts Health NHS Trust		Improves public realm and public spaces across the area and walking and cycling accessibility, connectivity, permeability and legibility to and from Whipps Cross Hospital, to Wood Street, Bakers Arms and Leytonstone, as well as other identified routes Whilst the Trust is committed to prioritising pedestrian and cycle movements in its emerging masterplan for the site and to encouraging modal shift and sustainable travel by Trust employees, this criterion as currently drafted potentially has wide-ranging implications; it seeks the improvement of public realm and public spaces across a large area, as well as seeking a range of other changes. The large geographical area that is described could result in significant additional development costs on top of the major investment in social infrastructure that is proposed. Instead, we request that any such improvements be decided once a range of interventions has been studied by way of a detailed Transport Assessment for the site and agrees with the highways and transport authorities. We also request that the Council seeks to direct CIL receipts to the types of intervention that it lists at draft criterion 7. and / or that it treats such interventions that might be delivered by developer(s) of the Whipps Cross site as a CIL 'payment in kind'.	This comment is noted for further discussion in relation to transport matters and mitigation of development impacts on the Epping Forest Special Area of Conservation.

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Policy 67: Liveable Neighbourhoods for All				
ID	Full Name	Organisation	Comment	Council (Officers) Response
494	Ms Alison Hill		The electric car charging points are a great idea as you can't stop people wanting to use a car but encouraging electric is better. Cyclists now have priority in the borough but shared space with walkers just does not work well. Sadly the cycle lanes by bus stops are quite dangerous. The bus lanes should have been kept and cyclist share those. Copenhagen crossings have been pretty dangerous too. Nobody understands them well enough and now no one looks when they cross the road. Its all very well to try to reduce motor use and clean up the air but it is difficult on a local level. The car free day for example - just moved traffic to other roads (I live near Forest Rd) and increased pollution there for the day. Speed bumps also are a problem as despite slowing vehicles they increase emissions from vehicles going over them and making using a bus uncomfortable for people in pain or with mobility issues.	Comment is noted and it will be taken into consideration when preparing the Proposed Submission Local Plan. Policy 67 along with the other policies of Chapters 12 (Social and Community Infrastructure) and 15 (Sustainable transport and Infrastructure) seek to ensure and improve timely, strategic and local infrastructure in order to accommodate the increase in demand and developing genuine transport choices in order to deliver Liveable Neighbourhoods.
562	Mrs Barbara Chapman		The infrastructure of the area, especially doctors, schools, and transport, cannot possibly sustain these proposals.	Comment is noted. The Council will continue to work closely with TfL and London Overground in improving the existing transport network. This comment will be taken into consideration when preparing the Proposed Submission Local Plan and the Infrastructure Delivery Plan (IDP). Those will assess the existing and future need for infrastructures, providing an efficient transport network, GPs and schools which accommodate the increase in demand and developing genuine transport choices in order to deliver Liveable Neighbourhoods for All.
992	The City of London	The Conservator's of Epping Forest	The City Corporation welcomes Policy 67 - Liveable Neighbourhoods for All (p143) which reflects one of the City Corporation's five strategic objectives for Epping Forest.	Support noted and comment will be taken into consideration when preparing the Proposed Submission Local Plan.
1380	Jennefer Peters	Senior Strategic Planner, London Plan	The Mayor welcomes the borough's commitment to achieve the objectives of his London Transport Strategy, including the ambition to achieve an 80% mode share for active and sustainable travel by 2041.	The Council notes the TfL support and comment will be taken into consideration when preparing the Proposed Submission Local Plan.

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Policy 67: Liveable Neighbourhoods for All				
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		Team Greater London Authority		
1381	Jennefer Peters	Senior Strategic Planner, London Plan Team Greater London Authority	The Mayor strongly supports WF's intention to deliver car free development in its southern and central areas which is largely a continuation of the borough's approach over recent years. The draft Local Plan at paragraphs 15.10 and 15.12-14, set out WF's intention to improve the borough's cycling and public transport networks to meet the changing needs of residents and positively support less car-dependent development in the borough, and this too is welcome.	The Council notes the TfL support and comment will be taken into consideration when preparing the Proposed Submission Local Plan.
1556	Mark Furnish	Sport England	Sport England supports the intention to promote and facilitate active travel measures, contribute towards healthy streets and the active use of streets and public spaces. These factors align with Active Design principles and should encourage communities to be active.	Support noted and comment will be taken into consideration when preparing the Proposed Submission Local Plan.
1951	Steve Lowe		My feeling that the Council isn't seriously concerned about public transport is the greater when I see that, under Policy 67 "Liveable Neighbourhoods for All", this item - "Ensuring neighbourhoods have good connections to public transport" - comes a poor ninth; surely it should be close to the top of the list?	Comment noted and the strengthening of policy 67 wording will be taken into consideration when preparing the Proposed Submission Local Plan.
1952	Steve Lowe		The tenor of the Plan is that car ownership and use is as reprehensible as anti-social behaviour. There are lots of elderly people and those who are in poor health who are already in that position. Seeming to vilify car use as the Plan implies, and adopt corresponding policies, is to risk excluding these people from the benefits that the Plan is seeking to promote and which - I presume - the Council wishes all residents to experience.	Comment noted. The strengthening of policy wording will be taken into consideration when preparing the Proposed Submission Local Plan.
1965	Ms Rosa Ruggieri		The area was an area of clean air, traffic or cut through traffic was as little as can be expected, However, now it has increased to a level that a residential area cannot support and the growth	Comment noted. The strengthening of policy wording will be taken into consideration when preparing the Proposed Submission Local Plan. The Council acknowledges the need to

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Policy 67: Liveable Neighbourhoods for All				
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			<p>of traffic flow proposed will not be able to support it, if the plans go ahead; this will also destroy the surrounding green area and produce more air pollution that should be acceptable. The Borough is planning to extend links and increase business opportunities from Enfield through the Borough onto Essex, but it has not looked at it in its entirety or investigated the effect it will have on local residents. There is so much talk of the environment/air pollution/climate change etc, and how the London Mayor is trying to lower this by whatever means he can (by making money in the process) that London Borough of Waltham Forest is obviously not aware that all three of these factors will effect the residential areas of Kings Head Hill/Sewardstone Road/Drysdale Avenue and other roads leading off Drysdale Avenue. The London Borough of Waltham Forest and Transport For London rather than look at solving a problem that already exists; everyone. Working for both organisations think it is easier to increase the flow of traffic and ignore present issues.</p>	<p>increase the provision of both social and physical infrastructure. This comment is noted when preparing of the Infrastructure Delivery Plan (IDP) that will assess the existing and future need for infrastructures in order to meet the borough's ambitions for air quality and local environment. Policies 55, 67, 69 and 93 seek to ensure and improve timely, strategic and local infrastructure investment and delivery to support good sustainable growth, along with active and sustainable transport choice across the borough. The Council will continue to work closely with TfL in improving the existing transport network</p>

Policy 68: Walking and Cycling				
ID	Full Name	Organisation	Comment	Council (Officers) Response
34	Sylvia Gullivan	Farishteh Trust	Cycle lanes need to be marked to show direction. At present bicycles ride in both directions	Historically there has rarely been a need to provide directional arrows on a with-flow cycle lane/track alongside a general traffic lane orientated in the same direction. However, in the light of this comment, Waltham Forest Council has noted this for further consideration.
148	Anthony Lyons		We believe that Orient Way should be the main route between the A104 and A106 rather than Church Road. Church Road has many schools and young children walking on the streets	Comment is noted and it will be taken into consideration when preparing the Proposed Submission Local Plan. We acknowledge the concern with regards the circulation on Orient Way. The Council will continue to work along with the

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Policy 68: Walking and Cycling				
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			whereas Orient Way provides access to Leyton Retail Park, the Recycling Centre and hopefully a new station too.	respective departments and stakeholders in order to minimise impacts.
399	Mr Andrew Chapman		Yes, there must be provision for new electric forms of transport such as scooters and cycles, as well as cars. It should be possible to commute to the train station using an electric scooter or cycle and store and charge at the station.	Comment is noted and it will be taken into consideration when preparing the Proposed Submission Local Plan.
843	Ms Tessa Craig		Existing Green and blue spaces should also be promoted in providing an appealing environment. for active travel and delivering well being benefits. Efforts could be made in connecting these spaces to the walking and cycling network. We note that this reference is made in policy 84 but it would be useful to also have it referenced in policy 68.	This comment has been noted with thanks. The Council acknowledges the importance of delivering liveable neighbourhoods and its benefits. Policies 67, 68 and 84 encourage the protection, preservation, and enhancement of green and blue infrastructure and open space as well as walking and cycle connections and facilities to those infrastructures.
850	Ms Tessa Craig		Policy 68 Walking B. Has a Typographical Error: Maximise opportunities to increase permeability of the in and around the development for people travelling by foot, bike or public transport.	Comment noted. The strengthening of policy wording will be taken into consideration in preparing the Proposed Submission Local Plan
1292	Josephine Vos	Transport for London - City Planning	We support this policy, though the final policy wording should take care to distinguish between the Council's approach of 'Liveable Neighbourhoods for all' and the TfL programme of 'Liveable Neighbourhoods' aimed at supporting improvements in specific areas. Any potential misinterpretation that prevents walking improvements being made outside of designated 'Liveable Neighbourhoods' should be avoided.	Support noted and comment will be taken into consideration when preparing the Proposed Submission Local Plan.
1293	Josephine Vos	Transport for London - City Planning	Under the heading Cycling, part B should refer to the 'London Cycling Design Standards' rather than the 'London Cycle Design Standards.'	Comment noted and the strengthening of document wording will be taken into consideration in preparing the Proposed Submission Local Plan.
1808	Robert Tatam		The page 240 (print version), Table 3.12, entitled "Ensuring Climate Change Resilience", is entirely blank! As is the supposed 'Figure X' referred to under Paragraph 15.10 that "shows the Council's future strategic cycle network"!	Comment noted and the strengthening of policy wording will be taken into consideration in preparing the Proposed Submission Local Plan. Table 3.12. Ensuring Climate Change Resilience (page 240) and Paragraph 15.10. Figure X (Council's future strategic cycle network) will be amended.

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Policy 68: Walking and Cycling				
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1810	Robert Tatam		Policy 68 on walking and cycling needs a greater urgency than "Where appropriate. and "i prominent locations".	Comment noted and the strengthening of policy wording will be taken into consideration in preparing the Proposed Submission Local Plan.
2157	anonymous response form 3		Forget mini Holland. What percentage of the aging North Chingford population can cycle up Firday Hill, Chingford Mount, Kings Head Hill?	Comment is noted and it will be taken into consideration when preparing the Proposed Submission Local Plan.
2158	anonymous response form 3		A white line and a painting of a bike is not a cycle lane that would encourage a car user to change. Just don't feel safe.	Comment noted.
2160	anonymous response form 3		More info of new "routes" e.g. Central to Queens Road walk.	The plan includes a commitment to increase the number of trips made by walking, cycling and public transport, and to improve local connections to these modes. A map of existing and proposed cycle routes will be included in the document.
2295	S Bell		The cycle lanes introduced along Forest Road by lloyds Park, Lea Bridge Road and Highams Park are positively dangerous for pedestrians alighting from buses and have led to a build up of slow moving traffic causing even more pollution.	Comment is noted and it will be taken into consideration when preparing the Proposed Submission Local Plan and the Infrastructure Delivery Plan (IDP), that will assess the existing and future need for infrastructures and transport links in order to meet the borough's ambitions to deliver Liveable Neighbourhoods.
2626	Mrs Krysia Sivyer		Please remember that not everyone is able bodied. Some people need cars, e.g. the elderly, inform and people with children. For those that are able bodied public transport has to be accessible and dependable. At the moment it is not.	This comment is noted. The Council is aware that not all residents within Waltham Forest are able bodied and thus able to use public transport as efficiently as possible. The Council will continue to work with TfL to ensure improvements to the accessibility to existing bus network, public transport infrastructure and stations.
2627	Mrs Krysia Sivyer		Cycles can be hugely dangerous to pedestrians as they are frequently ridden recklessly on public walkways. I no longer take my small grandchildren out to the forest for fear of an accident caused by fast cyclists racing thoughtlessly and selfishly through the forest and along the paths.	The Council is aware of a need to improve and increase designated cycle lane network in the borough to improve the safety for pedestrians using the public realm. Policy 68 Walking and Cycling seeks to increase and enhance the existing cycle lane network in the borough to ensure there is an appropriate provision of designated cycle lanes in the borough.

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107	Sally Slade		Whipps Cross- there needs to be a direct bus to the hospital from the North of the borough especially Chingford. Particularly with the new ULEZ.	Comment noted and will be taken into consideration when preparing the Proposed Submission Local Plan. The Council acknowledges the need to increase the provision of both social and physical infrastructure; and it will continue to work closely with TfL in improving the existing transport network. This comment is noted when preparing of the Infrastructure Delivery Plan (IDP) that will assess the existing and future need for infrastructures such as transport networks, stations, medical and educational facilities in the borough. Policies 55, 69 and 72 seek to ensure and improve timely, strategic and local infrastructure investment and delivery to support good sustainable growth, along with active and sustainable transport choice across the borough.
108	Sally Slade		Access to Crossrail 2- buses from North of the Borough to access this.	Comment noted.
109	Sally Slade		Train to Chingford/Liverpool Street- Can frequency be increased? This would accommodate more passengers.	Comment noted. The Council will continue to work closely with TfL and London Overground in improving the existing transport network.
110	Sally Slade		Buses North to South - There should be better access from the North to South and beyond.	Comment noted. The operation of buses falls within the remit of TfL. The Council will continue to work with TfL to address this issue.
138	Shelly Shenker		The plan refers to good routes etc- needs to be clearer that this is not about public transport but pedestrian/cycling opportunities.	Comment is noted and it will be taken into consideration when preparing the Proposed Submission Local Plan.
172	Anthony Thorne		Currently the Chingford to Liverpool Street line runs to capacity in the rush hours. There is no capacity to enable an increase in the frequency into Liverpool Street. A solution is to reinstate the loop into Stratford However, the lead time for this would be significant.	Comment is noted and it will be taken into consideration when preparing the Proposed Submission Local Plan. The Council acknowledges the need to increase the provision of both social and physical infrastructure; and it will continue to work closely with TfL in improving the existing transport network. This comment is noted when preparing of the Infrastructure Delivery Plan (IDP) that will assess the existing and future need

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				for infrastructures in order to meet the borough's ambitions for air quality and local environment. Policies 55, 67, 68, 69 and 93 seek to ensure and improve timely, strategic and local infrastructure investment and delivery to support good sustainable growth, along with active and sustainable transport choice across the borough.
173	Anthony Thorne		With the frequent breakdowns the reliability of the service cannot be guaranteed. Therefore there is need to consider what if any additional capacity can be provided and what work is required to improve the reliability of the service.	Comment noted. The operation of buses falls within the remit of TfL. The Council will continue to work with TfL to address this issue.
174	Anthony Thorne		With regards the buses again these are working to capacity but there poor communication when there is disruption occurs evidenced by the recent problem with the closure of Station Road for a burst water main	Comment noted. The operation of buses falls within the remit of TfL. The Council will continue to work with TfL to address this issue.
175	Anthony Thorne		Also there is the problem with road humps on bus routes causing unnecessary pain and discomfort the driver and customers so many travellers cannot use the buses.	Comment noted. Buses routes has been located in streets within the 20 mph zones. The Council and TfL will continue working closely with drivers to minimise impacts.
189	Mrs Christine Straub		There is no direct bus service to Whipps Cross. You either have to get two buses or a train and a bus. The bus from Chingford Hatch stops outside the hospital and it is a very long walk to get to outpatients, fracture clinics, hearing aid depts. etc. when you are not so fit	Comment is noted and it will be taken into consideration when preparing the Proposed Submission Local Plan. The Council is working with TfL and Whipps Cross University Hospital to improve the transport connection to the hospital.
197	Miss Anna Misterska		Yes, Transport is so important! I would like to see more cycling paths, more bike storage and upgrades to overground stations. In particular it would be good for the Chingford-Liverpool street train to run more frequently. I would also see the old tracks that connect this route to Stratford station used again.	Comment is noted and it will be taken into consideration when preparing the Proposed Submission Local Plan.
199	Mrs Christine Straub		North Chingford is already so overcrowded with the additional blocks of flats and houses that are being built i.e. Garfield Road car park; flats at the bottom of Stanley Road; flats at the bottom of Beresford Road. Where will all their cars go. It is very condescending to the people who will live in these units (not	Comment is noted and it will be taken into consideration when preparing the Proposed Submission Local Plan. The Council acknowledges the need to increase the provision of both social and physical infrastructure. The Council will continue to work closely with TfL in improving the existing transport network;

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			my words but your planning officers) to assume that because 50% will be social housing they will not have cars or any other form of personal transport	and acknowledges the need of some levels of car-parking in developments and areas that are less-connected to public transport and there are a number of carpark schemes available for residents to use. Waltham Forest Council seeks to encourage car-free lifestyle in areas that are well connected. This comment is noted when preparing of the Infrastructure Delivery Plan (IDP) that will assess the existing and future need for infrastructures in order to meet the borough's ambitions for air quality and local environment. Policies 69, 72 and 74 seek to ensure and improve timely, strategic and local infrastructure investment and delivery to support good sustainable growth, along with active and sustainable transport choice across the borough.
278	Paul Burden		While I generally agree with the policy. I don't believe that there has been enough recognition of the load and the Chingford Line. The new rolling stock will increase capacity by 30% However, this is probably actually need to meet current overloading	Support noted and comment will be taken into consideration when preparing the Proposed Submission Local Plan. The Council will continue to work closely with TfL and London Overground in improving the existing transport network.
291	Daf Bergin		Public transport?	Comment is noted and it will be taken into consideration when preparing the Proposed Submission Local Plan. Policy 69 seeks to improve and support public transport connectivity across the borough. The Council is working with TfL to improve the transport connections.
394	Ms Christine Hassall		Yes, The objectives are noble but piling more and more people on top of each other is not a nice idea. The trains into Liverpool street are already bursting at the seams. You are planning to build 27,000 homes, but I see nothing specific on how the trains are going to be able to get a significant number of these people into the City and back, just a vague intention to improve things. Do you liaise with London Transport with this plan? I don't see how all these people are going to be able to travel into the city at peak times. It is already a horrible experience at Liverpool	Comment is noted and it will be taken into consideration when preparing the Proposed Submission Local Plan. Policy 69 seeks to improve and support public transport connectivity across the borough. The Council is working with TfL and London Overground to improve the transport connections.

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			street station when the Chingford train comes in (about 2 minutes before it is due to leave) and the ensuing stampede is barely civilised. Unless there is government wide pressure on employers to allow people to work from home more often, then all this additional housing just isn't feasible.	
519	Mrs Claire Ford		Improve bus routes - so that buses can flow easily between destinations. Currently stopping and starting because of parked cars obstructing the road, as the road isn't wide enough for two buses to pass each other, along New Road on route to south Chingford. Need to consider pavement parking here. Need to invest in car parks particularly Hall Lane car park. Increase parking here so less parking on streets.	Comment is noted and it will be taken into consideration when preparing the Proposed Submission Local Plan. Policies 69 and 72 seek to improve and support public transport connectivity across the borough and car parking standards. The Council is working with TfL and London Overground to improve the transport connections in the north of the borough.
571	Mr David Smith		Trains to Stratford - TFL need to show some consideration for our train line - old trains, way out of date were supposed to be replaced in 2016, but, they could repair what little credibility they have left by reopening Hall Farm Curve and allocation a platform in Stratford for a Chingford service.	Comment is noted and it will be taken into consideration when preparing the Proposed Submission Local Plan and the Infrastructure Delivery Plan (IDP). The Council will continue to work closely with TfL and London Overground in improving the existing transport network. The Local Plan and IDP will assess the existing and future need for infrastructures, providing an efficient transport network, accommodating the increase in demand and developing genuine transport choices in order to deliver Liveable Neighbourhoods for all.
590	Mrs Sheree Mear		I do not support redevelopment of the Highams Park Overground station building or the car park/access road to the station adjacent to The Avenue. The station is pivotal to the village nature of Highams Park. Hale End Library must also be retained and protected. Shops should not be allowed to have ground floor residential accommodation with respect to any change of use applications and the development of James Yard should be conditional on single level access from the station to Larkshall Road adjacent to the level crossing.	Comment is noted and it will be taken into consideration when preparing the Proposed Submission Local Plan. The Council will continue to work closely with TfL and London Overground in improving the existing transport network and accesses to stations.

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604	Anthony Thorne		We are advised that there is the possibility of an increase frequency of the Overground trains into Liverpool Street and new trains. However, Liverpool Street cannot cope with the current flows of people on and off the trains today let alone increased numbers plus with the increase pressures there will be more breakdowns as the infrastructure is over stressed. In fact I would suggest that it only needs one incident to happen on the approaches to Liverpool Street the consequence will be disastrous.	Comment noted and it will be taken into consideration when preparing the Proposed Submission Local Plan. The Council will continue to work closely with TfL and London Overground in improving the existing transport network.
670	Mr Peter O Kane		The linkage to available suitable public transport capacity seems surprisingly weak.	Comment is noted and it will be taken into consideration when preparing the Proposed Submission Local Plan. The Council will continue to work closely with TfL and London Overground in improving the existing transport network and accesses to stations.
784	Councillor Alan Siggers		Transport: Has the Council consulted neighbouring councils particularly to the north in order to understand the transport implications of housing growth in the area. this must form part of any sustainable development/local plan. Have meetings been held with Transport for London regarding the impact of growth in the borough on the Victoria line and Central Line of London Underground or with Network Rail?	Comment noted and it will be taken into consideration when preparing the Proposed Submission Local Plan. The Council will continue to work closely with TfL and London Overground in improving the existing transport network and access to stations. The Council has undertaken the Duty to Cooperate meetings as part of the Local Plan consultation. These meetings discuss strategic planning issues such as infrastructure, housing and transport. Duty to Cooperate meetings are with neighbouring boroughs, councils and other relevant public sector bodies, including the Mayor of London, Greater London Authority (GLA), Transport for London (TfL), Network Rail, London-Stansed-Cambridge Consortium (LSCC), and the Clinical Commissioning Group (CCG).
1194	Rachel Kercani		Highams Park station platform is already very crowded at rush hour, this will only increase - what provision is being considered? Plus when commuters leave the station it is already rather hectic. The potential for accidents will only	Comment noted and it will be taken into consideration when preparing the Proposed Submission Local Plan. The Council acknowledges that increasing the housing delivery will have an impact on social and community infrastructure. The Council will continue to work closely with TfL and London Overground in

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			increase as more people try to cross Larkshall Road, Winchester Road and The Avenue. How will this be prevented?	improving the existing transport network and access to stations. Policies in Chapters 12 (Social and Community Infrastructure) and 15 (Sustainable transport and Infrastructure) seek to ensure and improve timely, strategic and local infrastructure investment and delivery to support good sustainable growth, along with active and sustainable transport choice across the borough. This comment is noted in preparing of the Infrastructure Delivery Plan (IDP) that will assess and the existing and future need for infrastructures.
1255	Rosie Sterry	Transport for London - Commercial Development	The proposal to develop specific residential car parking standards for the London Borough of Waltham Forest is welcomed, as this will enable a more locally focused approach to be developed, that better reflects the high public transport accessibility of many sites in the Borough.	Support noted and comment will be taken into consideration when preparing the Proposed Submission Local Plan. The Council will continue to work closely with TfL and London Overground in improving the existing transport network.
1294	Josephine Vos	Transport for London - City Planning	We strongly welcome the references to the role major development can play in supporting the delivery of public transport enhancements. We welcome the safeguarding of space for rail improvements, though this should be broadened to reflect that aspects other than space can affect the delivery of transport improvements, such as the design of the site (e.g. noise insulation). In some instances, sites may need to be protected for the expansion/enhancement of the public transport network.	Support noted and comment will be taken into consideration when preparing the Proposed Submission Local Plan
1296	Josephine Vos	Transport for London - City Planning	The policy should protect the role of supporting infrastructure for buses, such as bus stations and garages. While there may be potential for redevelopment on these sites, this can only be acceptable if altered or re-provided bus infrastructure enables bus services that meet the boroughs needs, including supporting growth and mode shift to public transport. TfL should be closely consulted on such schemes and any changes to existing arrangements must be carefully designed to enable a high-quality service to be maintained.	Comment noted and it will be taken into consideration when preparing the Proposed Submission Local Plan.

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1461	Colin Setchfield	The Parish Church of Saint Edmund	What improvements to bus routes would LBWF actively promote or support in order to better connect Chingford Mount to Meridian Water and the Crossrail 2 link to the west and Highams Park Overground Station to the east?	Comment is noted and it will be taken into consideration when preparing the Proposed Submission Local Plan and the Infrastructure Delivery Plan (IDP). The Council will continue to work closely with TfL and London Overground in improving the existing transport network. The Local Plan and IDP will assess the existing and future need for infrastructures, providing an efficient transport network, accommodating the increase in demand and developing genuine transport choices in order to deliver Liveable Neighbourhoods.
1477	Sara McDonnell Shacklock		***IN AGREEMENT WITH HPPG LETTER*** Agree that redeveloping the station building would ruin the character of the area's centre, which I know from friends in the area is much appreciated.	Comment noted. See response to HPPG (Gordon Turpin)
1694	Jennifer Herring		I am already experiencing increased passenger volume on the Chingford to Liverpool Street line due to new housing already created along the line. Any significant increase in passenger numbers on what is already a very congested route will be unbearable and not sustainable. The increase in passenger volume already using Highams Park station is already very noticeable and I do not believe the station or the train service could cope with significant additional numbers.	Comment is noted and it will be taken into consideration when preparing the Proposed Submission Local Plan and the Infrastructure Delivery Plan (IDP). The Council will continue to work closely with TfL in improving the existing transport network. The Local Plan and IDP will assess the existing and future need for infrastructures, providing an efficient transport network, accommodating the increase in demand and developing genuine transport choices in order to deliver Liveable Neighbourhoods.
1817	Robert Tatam		The statement that the proposed number of additional homes will only "be agreed where there is or will be sufficient infrastructure", if taken at face value, would in fact prohibit the vast majority of the proposed housing sites - in that the transport infrastructure (Overground trains, and Tube trains on both the Victoria and Central lines), for example, is already severely overcrowded at times, and there is insufficient space anywhere in the Borough to develop a number of the other stated infrastructure requirements (health centres, schools, roads, community buildings, sports facilities, etc. - in most cases	Comment noted and will be taken into consideration when preparing the Proposed Submission Local Plan. The Council acknowledges the need to increase the provision of both social and physical infrastructure. This comment is noted when preparing of the Infrastructure Delivery Plan (IDP) that will assess the existing and future need for infrastructures such as Doctor and GP surgeries, transport networks, early years, primary and secondary school facilities in the borough. Policies 55, 69 and 72 seek to ensure and improve timely, strategic and local infrastructure investment and delivery to support good

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			those present already are currently 'full to capacity' with the existing population). Your reliance on the benefits of the proposed Crossrail2 stations in neighbouring boroughs is of no assistance to your case, in that these stations are outside the walking distance from homes in Waltham Forest for a daily commute (and running additional buses is not the solution because the road networks to reach these stations are congested at peak times). Similarly, the hoped-for Hall Farm Curve, and the running of additional direct trains from the Chingford rail line stations to Stratford, while welcome, will only probably only have a small additional benefit in reducing overcrowding on the Liverpool Street to Chingford route.	sustainable growth, along with active and sustainable transport choice across the borough. The Council will continue to work closely with TfL in improving the existing transport network.
1932	Tony Thorne		The current public transport system is so stressed with current demands one would question what steps are being taken to increase the capacity.	Comment noted and will be taken into consideration when preparing the Proposed Submission Local Plan. The Council acknowledges the need to increase the provision of both social and physical infrastructure; and it will continue to work closely with TfL in improving the existing transport network. This comment is noted when preparing of the Infrastructure Delivery Plan (IDP) that will assess the existing and future need for infrastructures such as Doctor and GP surgeries, transport networks, early years, primary and secondary school facilities in the borough. Policies 55, 69 and 72 seek to ensure and improve timely, strategic and local infrastructure investment and delivery to support good sustainable growth, along with active and sustainable transport choice across the borough.
1933	Tony Thorne		With regards trains this will require either the reopening of the loop in to Stratford as Liverpool Street is unable to cope with any more trains but this will take at least 5 to 10 years to complete.	Comment noted and will be taken into consideration when preparing the Proposed Submission Local Plan. The Council will continue to work closely with TfL in improving the existing transport network.
1950	Steve Lowe		While there is some reference in the Plan to provision of additional public transport capacity, this seems only to relate to the impact of new development. There is no mention of the	Comment noted. The Council acknowledges the need to increase the provision of both social and physical infrastructure and it will continue to work closely with TfL in improving the

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Policy 69: Public Transport				
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			existing (over)crowding of (particularly) the Underground lines serving the Borough, and the crying need to deal with this. Doesn't the Council recognise this, or has it no ideas for sorting it out - not even in the timescale out to 2035?	existing transport network. This comment is noted when preparing of the Infrastructure Delivery Plan (IDP), which will assess the existing and future need for infrastructures such as doctor and GP surgeries, transport networks, early years, primary and secondary school facilities in the borough. Policies 55 and 69 seek to ensure and improve timely, strategic and local infrastructure investment and delivery to support good sustainable growth, along with active and sustainable transport choice across the borough.
2014	Dr Robert Gay		There need to be places accessible by public transport (and in particular, by the Night Tube at weekends) where 'bad neighbour' leisure uses (such as the club I mentioned at the meeting, which is open to 3am close to Mile End Tube, and which would certainly be a bad neighbour to a residential development on its site) can be accommodated without nuisance to residential occupiers.	Comment is noted and it will be taken into consideration when preparing the Proposed Submission Local Plan and the Infrastructure Delivery Plan (IDP). The Council will continue to work closely with TfL in improving the existing transport network.
2015	Dr Robert Gay		Leytonstone was developed as an area for people working in the centre of London to commute in by train to Liverpool Street. Comments were made about commuting being environmentally undesirable, but I would suggest that if people commuting into Liverpool Street live in Leytonstone and come in by the Tube, that is better than if they move out into Essex where they get driven to the station and then come in by long distance train from Audley End or Harlow. We need to make Leytonstone an attractive area for people who could choose to live much further out. In my view (and subject to the desirability of promoting office uses in Leytonstone Town Centre and other centres in the Borough) the Council should not be particularly concerned to promote employment within the Borough.	Comment is noted and it will be taken into consideration when preparing the Proposed Submission Local Plan and the Infrastructure Delivery Plan (IDP). Two of the main The Council's Local Plan strategies are the promotion of the economy to improve the life changes for all residents, students and workers; and ensuring growth is sustainable and supported by infrastructure. Policy 6 seeks to promote the south as the pre-eminent employment area in the borough. Whilst policies 55, 67, 68 and 69 intent to ensure and improve timely, strategic and local infrastructure investment and delivery to support good sustainable growth, along with active and sustainable transport choice across the borough. The Council will continue to work closely with TfL in improving the existing transport network.

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Policy 69: Public Transport				
ID	Full Name	Organisation	Comment	Council (Officers) Response
2035	Peter Drew		With any additional homes how will the local transport cope especially the Overground which at peak time is already overcrowded ? New and more trains would be required.	Comment is noted and it will be taken into consideration when preparing the Proposed Submission Local Plan. The Council acknowledges the need to increase the provision of both social and physical infrastructure; and it will continue to work closely with TfL in improving the existing transport network. This comment is noted when preparing of the Infrastructure Delivery Plan (IDP) that will assess the existing and future need for infrastructures in order to meet the borough's ambitions for air quality and local environment. Policies 55, 67, 68, 69 and 93 seek to ensure and improve timely, strategic and local infrastructure investment and delivery to support good sustainable growth, along with active and sustainable transport choice across the borough.
2079	Mike Sparrow		You site Crossrail 2 as being key for this 'Gateway' part of Chingford. Why should that be so? The areas affected are Angel Road and Ponders End. What has this got to do with this area of Chingford. It may well be good for Edmonton, that Crossrail 2 plans to go through it, who knows, but what we do know is how terribly congested the road is to get from Edmonton to Chingford, or vice-versa. It's a very busy and slow moving road, so why would one presume that people are going to make such a slow journey to that train station. And if they are, how will the council ensure that traffic can get to Crossrail without congestion? It would seem impossible bearing in mind the narrow road between the two reservoirs and over that narrow bridge by the waterworks. People will not drive to Edmonton with that level of traffic. Perhaps you will build that 'cycle greenway' that you mention and hope that everyone will peddle their way to Crossrail 2!	Comment is noted and it will be taken into consideration when preparing the Proposed Submission Local Plan and the Infrastructure Delivery Plan (IDP), that will assess the existing and future need for infrastructures in order to meet the borough's ambitions for air quality and local environment. Crossrail 2 will improve the affluence of commuters from outside the borough which come to Waltham Forest to get the Victoria Line and Overground. Policies 69, 72 and 74 seek to optimise and improve services throughout the Transport Assessment and Travel Plan in order to mitigate and reduce impacts.
2159	anonymous response form 3		North Chingford a "significant transport hub" There is not even a direct bus to the local hospital. The ageing population need this.	Comment noted. The Council acknowledges the need to increase the provision of both social and physical infrastructure; and it will continue to work closely with TfL in improving the

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Policy 69: Public Transport				
ID	Full Name	Organisation	Comment	Council (Officers) Response
				existing transport network. This comment is noted when preparing of the Infrastructure Delivery Plan (IDP) that will assess the existing and future need for infrastructures and transport links in order to meet the Borough's ambitions to deliver Liveable Neighbourhoods, especially in the North of the borough.
2375	Sue Wildridge		I think the focus should be on public transport especially buses. It's disappointing to see areas of the borough where the focus is on bikes has adversely impacted on buses. Many people rely on buses. Insisting on infrastructure as part of a development does not help this. The Council needs to commit to ensuring the operational improvements can potential pay for enhanced services. This is of importance given the increase in the number of people where residential development is planned. This creates issues in places and on routes.	Comment noted and will be taken into consideration when preparing the Proposed Submission Local Plan. The Council acknowledges the need to increase the provision of both social and physical infrastructure; and it will continue to work closely with TfL in improving the existing transport network. This comment is noted when preparing of the Infrastructure Delivery Plan (IDP) that will assess the existing and future need for infrastructures such as transport networks, stations, medical and educational facilities in the borough. Policies 55, 69 and 72 seek to ensure and improve timely, strategic and local infrastructure investment and delivery to support good sustainable growth, along with active and sustainable transport choice across the borough.
2413	Mr Roger Brown	Chair Love North Chingford	The North End of Station Road. At the meetings and in the AIP (sites described as 'game changer') the development of a 'build over' at the bus station was justified as currently an eyesore. Whilst this is true, it's no planning justification for a medium rise visually intrusive development at this key site, and certainly not just to take advantage of TfL's desire to dispose of property. This is a major interchange and any disruption or development has to be very carefully considered in context. Last Sunday there were 11 buses waiting in it. The AIP also misses out several of vital bus routes such as the 97, underestimating its interchange value.	Comment is noted and it will be taken into consideration when preparing the Proposed Submission Local Plan. The Council will continue to work closely with TfL in improving the existing transport network.

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Policy 69: Public Transport				
ID	Full Name	Organisation	Comment	Council (Officers) Response
2536	Ms Laura Gilbert		There's currently one bus route along Forest Rd from Blackhorse Rd and one up Blackhorse Lane. Greater frequency of buses needed to better connect the various centres - not everyone is able to walk or cycle.	The issues regarding frequency of buses and the need for better bus connections is noted. The Council will continue to work in partnership with TfL in developing appropriate sustainable transport policies that will assist in improving Waltham Forest's Bus network.
2882	Mrs Antonia Fernand		If there are many more people living in the borough how will they access the trains and the tubes which are already packed at rush hour? Is TFL going to create more trains?	Comment noted. The Council acknowledges the need to increase the provision of both social and physical infrastructure; and it will continue to work closely with TfL in improving the existing transport network. This comment is noted when preparing of the Infrastructure Delivery Plan (IDP) that will assess the existing and future need for infrastructures and transport links in order to meet the borough's ambitions to deliver Liveable Neighbourhoods for all.
2887	Mrs Janet McArthy		If the new properties are being built in the centre of Highams Park because of the good transport links, and the hope that people will not use cars so much, if at all, why has there been no support whatsoever for redirection of the W16 bus to access Whipps Cross Hospital, despite considerable new housing with little car parking? This would be a relatively easy thing to arrange and yet I have been to many meetings with the council and transport providers and it has not been seriously looked at. To access the only local hospital at Whipps Cross, people in Highams Park have a very difficult journey. My husband has major health problems and has had to attend many appointments there and we drive, as there is no other reasonable way for him to get there that he can manage, and yet we use buses and trains for many of our journeys, in fact, whenever possible.	Comment is noted and it will be taken into consideration when preparing the Proposed Submission Local Plan and the Infrastructure Delivery Plan (IDP). The Council is working with TfL and Whipps Cross University Hospital to improve the transport connection to the hospital.
2898	Ms Mary Holden		Transport to and from the hospital is also an issue. There is no easy way for me to access the hospital from my address without taking 2 buses with a journey time of 51 minutes (according to	Comment is noted and it will be taken into consideration when preparing the Proposed Submission Local Plan. The Council is working with TfL and Whipps Cross University Hospital to improve the transport connection to the hospital.

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Policy 69: Public Transport				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			TfL). This must also be a concern for others in my area and also other areas of the borough.	

Policy 70: Deliveries Freight and Servicing				
ID	Full Name	Organisation	Comment	Council (Officers) Response
812	Freight Transport Association		FTA wants to see support from the London Borough of Waltham Forest for a fundamental reform of the London Lorry Control Scheme (LLCS).	Comment noted. The Council will explore this proposal when preparing the Proposed Submission Local Plan.
813	Freight Transport Association		The Association does not support the prescriptive use of FORS in Waltham Forest.	Comment noted. The Council has been guided by TfL to consider the Fleet Operator Recognition Scheme (FORS) Silver Standard in order to ensure the safety and efficiency of road transport operators working on construction projects in urban areas.
818	Freight Transport Association		Whilst there are social impacts from vans and lorries, in terms of road safety and emissions, it should be acknowledged that there are also massive social benefits such as: enabling local businesses to function; employment opportunities in the logistics industry; and residents, visitors and the workforce obtaining the goods and services they desire at a price they can afford.	Comment noted. The Council acknowledges the importance and benefits of commercial vehicles, construction traffic and their journeys, as well as their social impacts. The Local Plan, Policy 71 seeks efficient and sustainable servicing and deliveries across the Borough.
820	Freight Transport Association		it is important that the borough recognises how the logistics industry can the help the borough achieve its strategic objective and ensure the policies in the Local Plan can support this vital sector and benefit communities and local economies	The Council recognises the importance of the logistic industry as a strategic objectives and economic activity of the Local Plan. Policies 71 and 72 state the importance of retain, safeguard and intensify existing employment land (including Strategic industrial Locations (SILs) and Borough Employment Areas (BAE)), in order to improve job opportunities for residents, meet the future needs of a resilient and vibrant economy and local communities.

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Policy 70: Deliveries Freight and Servicing				
ID	Full Name	Organisation	Comment	Council (Officers) Response
821	Freight Transport Association		Waltham Forest's number one objective is to increase housing delivery. To achieve this, lorries will be essential to supply the building and fitting of them. One average sized three-bedroom house requires at least 34 freight vehicle movements. If there are onerous restrictions, such as how those deliveries can be made or bans on lorry movements at key times of day, this will increase the final bill and make it harder to complete these projects. And expecting all deliveries to be made by van instead of HGV, will require around 270 vehicles; an almost eight- fold increase in vehicle movements, increasing emissions (including brake and tyre wear), adding costs through drivers' wages and increasing congestion.	Comment noted. The Council acknowledges that increasing the housing delivery will have an impact on freight vehicle movements. Policies 71 and 72 state the request of robust Construction Logistic Plans (CLPs) prior to commencement of the development. The new Local Plan intends to minimise impacts on the highway network, public transport services, environment and surrounding residents.
828	Freight Transport Association		A - Whilst the overall aim of reducing the number of freight, servicing and delivery trips is laudable, care should be taken to avoid unintended consequences such as restricting access to suppliers.	Comment noted. Proposals and measurement to deliver and reduce the number of freights, servicing and delivery trips will be considered for benefits need of business.
830	Freight Transport Association		B and C - We support these policies. It should be noted that freight is a diverse industry delivering a wide range of items and micro consolidation is not the answer for everything.	Support noted and comment will be taken into consideration in preparing the Proposed Submission Local Plan. The Council appreciates the acknowledgment of the new Local Plan approach to minimise impacts of deliveries, freight and servicing.
831	Freight Transport Association		Consolidation can play a role in potentially reducing the number of freight vehicle movements in certain circumstances. However, it should be targeted at vehicles which are not full to capacity rather than breaking up fully consolidated loads, as this could lead to more vehicles on the road, not fewer. Many retail operations, for example, will already have heavily consolidated deliveries as part of their supply chain. For non-retail businesses receiving many deliveries to different locations, consolidated deliveries and joined up procurement can play a part in minimising movements. The question of funding is also important because adding another link to the supply chain will incur cost, so it is likely that there will need to be some ongoing	This comment is noted in preparing the Proposed Submission Local Plan. This approach would be in line with Waltham Forest Council's new Local Plan and it will be taken into consideration when preparing the Infrastructure Delivery Plan (IDP).

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Policy 70: Deliveries Freight and Servicing				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			public funding. Porterage or using bicycles for deliveries will still require space to replenish loads, which will need to be centrally placed to ensure maximum efficiency and minimise distances travelled	
832	Freight Transport Association		D - FTA supports measures to enable more deliveries to be retimed, to make better use of the road space available and to allow vehicles to travel when the roads are less congested. We call on Waltham Forest to support fundamental reform of the LLCS.	Comment noted. The Council is of the view that the London Lorry Control Scheme (LLCS) provides the right information to continue supporting it.
833	Freight Transport Association		E - FTA does not support the prescriptive use of FORS in the London Borough of Waltham Forest. Whilst we support what FORS seeks to achieve in terms of road safety, if an operator has an issue with the cost of FORS, or the service they receive from it, we are concerned that they are being compelled to use it if they wish to serve contracts that have FORS as a requirement.	Comment noted. The Council has been guided by TfL to consider the Fleet Operator Recognition Scheme (FORS) Silver Standard in order to ensure the safety and efficiency of road transport operators working on construction projects in urban areas
834	Freight Transport Association		It is questionable if legally the borough can require operators to be a user of one specific named fee-charging accreditation scheme as this would create a monopoly.	This comment is noted in preparing the Proposed Submission Local Plan.
835	Freight Transport Association		Another area of concern is that FORS audits elements such as road safety, environmental performance and terrorism policies. However, it is not a robust audit of the Operator Licence itself. Firstly, this means that FORS accredited operators, even at Silver and Gold status are not necessarily legally compliant operators and secondly and more worryingly, some have wrongly assumed that a FORS audit is a robust audit of the Operator Licence and have taken false comfort in passing an audit where they in fact have significant legal compliance issues and have been called to Public Inquiry by the Traffic Commissioners which govern our industry. We would draw particular attention to DVSA's Earned Recognition (ER) scheme, which is a nationally recognised standard centred around ensuring excellence in compliance with the legal safety	This comment is noted in preparing the Proposed Submission Local Plan. It is proposed to review Policy 70 of the plan to take into account other accreditation schemes and standards as suggested.

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Policy 70: Deliveries Freight and Servicing				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			requirements of HGV operations. FTA believes ER is a better route to achieving safety improvement in the wider logistics market. Since the concept of FORS was first developed, the landscape has changed. With the introduction of London's Direct Vision Standard in 2020, much of the safety elements of FORS will now be covered by regulation. At the very least, LB of Waltham Forest should be open to a wider range of accreditation schemes and standards.	
837	Freight Transport Association		F - People often opt to receive personal deliveries at their workplace as it is convenient and reduces the chance of a failed home delivery and the associated wasted time and emissions. This is a form of consolidation and the clustering of businesses offers opportunities for click and collect points within buildings. FTA urges the borough to avoid blanket bans of personal deliveries and to work with businesses to identify collection points in multi-tenanted buildings. Currently the evidence base is not strong enough to ensure there will be no unintended consequences, such as increasing overall vehicle movements, if more individual deliveries are made to click and collect rather than to a single building. A vehicle may be already making a B2B (business to business) delivery at that location anyway and therefore a B2C (business to consumer) delivery would reduce vehicle movements	This comment has been noted. This approach would be in line with Waltham Forest Council new Local Plan and it will be taken into consideration when preparing the Infrastructure Delivery Plan (IDP).
838	Freight Transport Association		G - New residential or mixed-use developments must be designed and managed so that deliveries can be received out of peak hours and if necessary, in the evening or night-time without causing unacceptable nuisance to residents. It is important that vehicle size and manoeuvrability requirements are properly assessed for current and potential future uses. Failure to do so could make such facilities redundant and further impact on kerbside demand.	This comment is noted in preparing the Proposed Submission Local Plan. Policies 5, 70 and 72 in Waltham Forest Council's Local Plan seek to encourage the development of compatible new homes and mixed uses development and minimise impacts on the highway network, public transport services, environment and surrounding residents. Construction Logistic Plans (CLPs) prior to commencement of the development will be requested, if applicable.

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Policy 70: Deliveries Freight and Servicing				
ID	Full Name	Organisation	Comment	Council (Officers) Response
839	Freight Transport Association		We are pleased to see that the borough is committed to utilising best practice such as the Transport for London (TfL) toolkit2 for retiming deliveries. FTA chaired the consortium which provided advice and expertise to TfL on its development.	Support and comment noted.
840	Freight Transport Association		Whilst there is a wide range of electric cars currently on the market, the same cannot be said for commercial vehicles. Indeed, electric van supply is severely limited, as is model choice and there are currently no electric trucks on sale, neither are we expecting there to be in the short-medium term. There are no diesel vans with emissions lower than 75g CO2/km currently available on the market, and HGVs are not measured in the same way as cars and vans for CO2. There should be greater clarity about how zero-emission capable vehicles will be treated. FTA wants to see more support such as refuelling and infrastructure, and financial incentives to enable operators to start to switch their fleet to zero emission technology. We urge restraint before introducing restrictive schemes limiting non-zero emission commercial vehicle usage in the borough until such vehicles are readily available on the market.	Comment noted and it will be taken into consideration when preparing the Proposed Submission Local Plan.
855	Ms Tessa Craig		The River Lee Navigation provides the opportunity to transport freight by water this reducing congestion and carbon emissions. We note that there is no reference in this section to the potential to for waterborne freight although this is mentioned in policy 88.	Comment noted and it will be taken into consideration when preparing the Proposed Submission Local Plan. Policy 71 and 88 seek to improve the delivery of freight and servicing in the best way and route, waterways are considered and valued in one of them, even though it is very limited.
1080	Ms Alison Blom-Cooper	Planning Department Epping Forest District Council	It would be helpful if Policy 70 (Deliveries, Freight and Servicing) included reference to avoiding using roads through the EFSAC including within the Epping Forest District administrative area in order to minimise impacts of traffic on the EFSAC in relation to air quality.	Comment noted and the strengthening of document wording will be taken into consideration in preparing the Proposed Submission Local Plan. The Council recognises the challenges of delivering large developments and meet the borough's ambitions for air quality and local environment. The Council will continue to work closely with The Epping Forest District Council (EFDC), the Essex County Council (ECC), neighbouring boroughs, councils and other relevant public sector bodies. The Council has undertaken the Duty to Cooperate meetings as part of the

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Policy 70: Deliveries Freight and Servicing				
ID	Full Name	Organisation	Comment	Council (Officers) Response
				Local Plan consultation. The Local Plan, policy 70 seeks to optimise and facilities services throughout Construction Logistic Plan (CLP) in order to reduce risks and mitigate impacts.
2652	Hayden Bannochie		I'd like to see the deterrence of through-traffic from users of the North Circular and other major arteries. Especially where they use inappropriate roads: for instance, Billet is heavily residential but used by HGVs and many commuters as a 'short cut' to get between the North Circular and Tottenham: literally the only thing those users bring to the borough is pollution and a decreased life expectancy.	Comment is noted and it will be taken into consideration when preparing the Proposed Submission Local Plan. The Local Plan has taken into consideration the rise of driven distance of Light Commercial Vehicles and HGVs. Policy 70 seeks to optimise and minimise the adverse impacts of deliveries, freight and servicing in the local environment.
2884	Mrs Antonia Fernand		With less car use people will do more online shopping which will raise the amount of vehicles delivering food, parcels etc.	Comment noted. The Local Plan has taken into consideration the rise of driven distance of Light Commercial Vehicles and HGVs, as well as support alternative transport modes as car clubs and electric vehicles combined with public transport. Policy 70 seeks to optimise and minimise the adverse impacts of deliveries, freight and servicing in the local environments.

Policy 71: Construction Logistics Plans				
ID	Full Name	Organisation	Comment	Council (Officers) Response
826	Freight Transport Association		New distribution centres should be designed to accommodate vehicles and their drivers to park up safely and securely with access to basic welfare facilities (i.e. toilets) and larger developments should provide greater levels of facilities for overnight breaks (i.e. showers and hot food). Overnight facilities may be chargeable, and the level of charge would depend on the level of security and the quality and range of facilities on offer. New logistics sites should be built to accommodate the largest trucks possible and include alternative fuel and recharging infrastructure to support the	Comment noted. The Council recognises the challenges of delivering large developments and the need of new distribution centres, logistic sites and their facilities in order to meet the borough's ambitions for air quality and local environment. The Local Plan, policies 70, 71 and 72 seek to optimise and facilities services throughout the Construction Logistic Plan (CLP) in order to reduce risk and costs.

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Policy 71: Construction Logistics Plans				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			uptake of electric and alternatively-fuelled freight vehicles to help meet the borough's ambitions for air quality.	
842	Freight Transport Association		We support these policies. It should be noted that freight is a diverse industry delivering a wide range of items and micro consolidation is not the answer for everything. Consolidation can play a role in potentially reducing the number of freight vehicle movements in certain circumstances. However, it should be targeted at vehicles which are not full to capacity rather than breaking up fully consolidated loads, as this could lead to more vehicles on the road, not fewer. Many retail operations, for example, will already have heavily consolidated deliveries as part of their supply chain. For non-retail businesses receiving many deliveries to different locations, consolidated deliveries and joined up procurement can play a part in minimising movements. The question of funding is also important because adding another link to the supply chain will incur cost, so it is likely that there will need to be some ongoing public funding. Porterage or using bicycles for deliveries will still require space to replenish loads, which will need to be centrally placed to ensure maximum efficiency and minimise distances travelled. FTA supports measures to enable more deliveries to be retimed, to make better use of the road space available and to allow vehicles to travel when the roads are less congested. We call on Waltham Forest to support fundamental reform of the LLCS.	Support and comment noted. The Council has been guided by TfL to consider the Fleet Operator Recognition Scheme (FORS) Silver Standard in order to ensure the safety and efficiency of road transport operators working on construction projects in urban areas. The proposal will be taken into consideration to be explored.
844	Freight Transport Association		FTA does not support the prescriptive use of FORS in the London Borough of Waltham Forest. Whilst we support what FORS seeks to achieve in terms of road safety, if an operator has an issue with the cost of FORS, or the service they receive from it, we are concerned that they are being compelled to use	Comment noted. The Council has been guided by TfL to consider the Fleet Operator Recognition Scheme (FORS) Silver Standard in order to ensure the safety and efficiency of road transport operators working on construction projects in urban areas.

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Policy 71: Construction Logistics Plans				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			it if they wish to serve contracts that have FORS as a requirement.	
845	Freight Transport Association		Waltham Forest should consider retiming of deliveries to outside the 07:00-10:00 peak to support the construction industry. Later deliveries after work has finished is also problematic as there is the issue of security of the materials being delivered. Movement of waste material may take place later in the day.	This comment is noted in preparing the Proposed Submission Local Plan. Policies 71 and 72 state the request of robust Construction Logistic Plans (CLPs) prior to commencement of the development. The Council will ensure and minimise impacts on the highway network, public transport services, environment and surrounding residents.
846	Freight Transport Association		As a multi-modal trade association, FTA supports initiatives to move more freight by rail and water. Although it is likely to have a relatively small impact in terms of reducing the amount of overall road freight, there are some potentially large opportunities, particularly for the construction and waste sectors, but this is dependent on safeguarding existing infrastructure and enabling new opportunities for river and rail.	This comment has been noted. It is proposed to consider and acknowledge the role of other modes - such as river and rail in construction logistic plans.
1410	Blackrock and NEAT Development		The Policy states that in locations with high levels of development area-wide CLPs will be developed by the Council and these areas will be expected to adhere to these plans by developing site specific CLPs that confirm the Area CLP and where appropriate, contribute to their development which is more onerous than the London Plan.	Comment is acknowledged and it will be taken into consideration when preparing the Proposed Submission Local Plan.
1411	Blackrock and NEAT Development		The policy is more onerous than what is provided within the NPPF.	Comment has been noted and it will be taken into consideration when preparing the Proposed Submission Local Plan.
1630	Bob Bennet		The policy as drafted implies that every single development in the borough, However, small, will require a construction logistics plan. Although the policy is qualified by the words "where appropriate" decision makers will inevitably play safe and require a CLP for every planning application submitted. This	Comment noted. The strengthening of policy wording will be taken into consideration in preparing the Proposed Submission Local Plan. Paragraph 15.20 along with Policy 71 state that Construction Logistic Plans will be required form sites that will be potentially detrimentally impacting the safety, congestion or environment.

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Policy 71: Construction Logistics Plans				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			is considered to be unnecessary, unduly and onerous for minor developments.	

Policy 72: Managing Vehicle Travel Traffic				
ID	Full Name	Organisation	Comment	Council (Officers) Response
35	Sylvia Gullivan	Farishteh Trust	Noise of certain traffic is an issue. e.g. Motorcycles having had silences "removed" and speed not checked.	Comment noted.
147	Anthony Lyons		We would like the Draft Plan to note that transport by car is very congested between Lea Bridge Road and the A104 and, in particular, the use of Church Road as a through fare which has bottle necks at either end.	Comment is noted and it will be taken into consideration when preparing the Proposed Submission Local Plan. The Council acknowledges the concern regarding the traffic, car parking and road congestion. Policy 72 and 74 seek to encourage a robust evaluation of developments throughout the request of Car Parking Management Plan, Transport Assessment and Travel Plan (when applicable) in order to minimise impacts and risks.
149	Anthony Lyons		We feel improving circulation on Orient Way would provide the greatest impact in the Draft Plan. Indeed, the roundabout on Orient Way is not fit for purpose. Changing this would reduce congestion across Leyton and provide better access to the planned developments. We feel this needs to be resolved before the potential of the Draft Plan can be realised and which will only get worse as the local population grows	Roundabouts have the highest motor vehicle capacity of all junction types, historically they have also tended to be best performing junction type in terms of overall collision statistics. However, they are generally very poor from a non-motorised user perspective in terms of accessibility, directness and safety, particularly for cyclists. In this particular case, congestion is not caused by the roundabout itself but by the volume of traffic associated with both Orient Way and the Temple Mills retail park. The existing signalised junctions on Ruckholt Road have the biggest impact on network capacity in this area and these were upgraded in the past four-to-five years to include dedicated pedestrian and cycle crossing facilities. Accordingly, there are no immediate plans to make further changes to these,

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Policy 72: Managing Vehicle Travel Traffic				
ID	Full Name	Organisation	Comment	Council (Officers) Response
				or the roundabout itself. However, Waltham Forest Council will continue to review the traffic situation in this area.
185	Anthony Thorne		The increase traffic required to services the demands of the additional number of residents. Lorries to service shops, pubs and alike, plus the refuse collection service, the surface water drain cleaning etc.	Comment noted.
201	Anthony Lyons		The junction at Lea Bridge Road and Church Road is particularly problematic in that it is not possible to turn right into Church Road when travelling north on Lea Bridge Road. Many cars are forced to block traffic and complete u-turns on Lea Bridge Road and the surrounding residential streets as there is no alternative route. We believe that Orient Way should be the main route between the A104 and A106 rather than Church Road. Church Road has many schools and young children walking on the streets whereas Orient Way provides access to Leyton Retail Park, the Recycling Centre and hopefully a new station too. We feel improving circulation on Orient Way would provide the greatest impact in the Draft Plan. Indeed, the roundabout on Orient Way near the retail park is not fit for purpose. Changing this would reduce congestion across Leyton and provide better access to the planned developments. We feel this needs to be resolved before the potential of the Draft Plan can be realised and which will only get worse as the local population grows.	Comment is noted and it will be taken into consideration when preparing the Proposed Submission Local Plan. We acknowledge the concern with regards the circulation on Orient Way. The Council will continue to work with the respective departments and stakeholders in order to minimise impacts.
227	Mike Lang		The environment is important but this area needs a specific approach- There is no Tube and a lot of people in the area need van/drive cabs for a living. Pedestrianisation/cycle is not the answer here. Instead we need reduced congestion, electric charging points and early engagement with the hydrogen economy	Comment is noted and it will be taken into consideration when preparing the Proposed Submission Local Plan. The Council will continue to work closely with TfL in improving the existing transport network; and acknowledges the need of some levels of car-parking in developments and areas that are less-connected to public transport and there are a number of carpark schemes available for residents to use. The Council

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Policy 72: Managing Vehicle Travel Traffic				
ID	Full Name	Organisation	Comment	Council (Officers) Response
				seeks to encourage car-free lifestyle in the south of the borough and in areas that are well connected to public transport.
245	Valerie Muscutt		Not keeping pace with more people in the rush hour/school hours in particular	Comment has been noted.
377	Mr Ashley Uglow		managing and mitigating isn't enough. issues need to be resolved in the design. Reducing regular car travel is not the same as reducing the need to own a car. In order to live in the modern era a car is common if only used occasionally, e.g. for certain shopping, visiting relatives out of London and holiday. Also visitors from rural areas will likely come by car. Car ownership is not itself damaging to the environment. Therefore all housing should have plentiful parking. Additional parking will free up the roads for buses and bikes/scooters to make regular commuting more pleasurable and less polluting. Any development should therefore provide at least 1 space per household and multiple per commercial property. A ratio of 0.1 is the cause of our unsightly and polluted city and not the solution.	Comment is noted and it will be taken into consideration when preparing the Proposed Submission Local Plan.
389	Mrs Pauline Whitbread		No, LBWF need to look now and not in 5 years time to reduce emissions in North Chingford. You have created a total traffic block from the bottom of Kings Head Hill to the junction of The Green and Station Road. Why did you remove the turn left triangle at Station Road? Ever since then the traffic at peak times is always at a standstill! Why have you not co-ordinated the lights so that to reduce cars queueing along The Ridgeway/Kings Head Hill/Kings Road/Station Road. Surely this needs to be addressed before further houses are built. Basically the narrow Victorian roads that surround 'the village' which is how the area around Station Road is still known by locals, are not suitable for a further influx of vehicles. Regardless of your	Comment is noted and it will be taken into consideration when preparing the Proposed Submission Local Plan. Policies 72 and 74 seek to encourage a robust evaluation of developments throughout the request of Car Parking Management Plan in order to minimise impacts and risks. Also, the Local Plan takes into consideration that disabled parking and car clubs will be provided for all developments, including car-free proposals.

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Policy 72: Managing Vehicle Travel Traffic				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			intentions to reduce car use, people will still require their cars for a number of different reasons including work, leisure and many other reasons. It is not possible for everyone to walk or to take the bus or other forms of public transport to their intended venue	
526	Miss Joanna Moncrieff		No. There is already more than enough provision for cyclists in Walthamstow. North Chingford where I live has a totally different demographic and it is just not practical for those who currently use cars to cycle instead. Many of my neighbours shop or visit places such as Lakeside, Epping or Waltham Abbey. These are all too difficult to get to by public transport but very easy in a car. We already have good transport links in North Chingford. We need more parking spaces not less. The lack of parking spaces has affected people's use of the local shops which are closing at an alarming rate.	Comment is noted and it will be taken into consideration when preparing the Proposed Submission Local Plan. Policies 72 and 74 seek that developments improve car parking and vehicle uses in the borough, especially in North Chingford, in order to deliver Liveable Neighbourhoods for All.
554	Wendy Holloway		I agree that public transport should be used as much as possible, However, cars can be necessary e.g. when my husband was being treated for cancer last year, as taxis are very expensive. Bicycles must not be given priority over pedestrians and there needs to be more education/stopping of them when cyclists ride on the pavement. What is the point of designating the side of a road as a cycle track but also allowing cars to park on them? Why was Nightingale Avenue (curvy) made the cycle route rather than Sunnysdene Avenue (much straighter)? Also the cycle route was put along Cliveden Road which was full of pot holes at the time. There needs to be proper surveying in advance of introducing cycle lanes. New development should not be without car parking spaces as it increases pressure on adjacent roads instead. You cant prevent people from owning cars. There should be more trains from Highams Park as the number of LBWF residents increases, but neither Liverpool Street nor Stratford (if the loop is re-opened) have sufficient	Supported noted and comment will be taken into consideration when preparing the Proposed Submission Local Plan. Policies 69, 72 and 74 seek to improve and support public transport connectivity across the Borough and car parking standards in order to deliver Liveable Neighbourhoods for all. The Council is working with TfL and London Overground to improve the transport connections in the north of the borough.

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Policy 72: Managing Vehicle Travel Traffic				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			capacity. The increased number of people using the Victoria Line due to the Blackhorse Road development is also an issue.	
582	Mr Len Banister		Roads have not been durably repaired especially in Falmouth Drive. Thorough re-planning is required to reduce the chaos surrounding the Highams Park Schools. Parking schemes should be revisited	Comment is noted and it will be taken into consideration when preparing the Proposed Submission Local Plan. Policies 72 and 74 seek that developments improve car parking and vehicle uses in the borough, especially in the north of the borough, in order to deliver Liveable Neighbourhoods for All.
847	Freight Transport Association		A & C - If residents are to be encouraged to live car free or to be less reliant on private cars, they will be even more dependent on the freight industry. FTA would like to work with the borough to develop solutions to support efficient freight and deliveries. Whilst FTA supports measures to encourage more individuals to move away from private car ownership and usage, and reduce discretionary journeys, care should be taken that schemes aimed at delivering this objective do not adversely impact on access for essential delivery and servicing vehicles.	The implications for essential servicing and delivery vehicles is noted. The Plan draws attention to such considerations as covered under Policies 39 (f) 49(d) and 70.
848	Freight Transport Association		The freight industry plays a crucial role in supplying local communities and supporting the local economy. It is vital that parking charges and options aimed at reducing private car ownership and usage are not applied to the vans and lorries that supply local shops and deliver goods and services direct to customers. To assist residents and local businesses reduce their reliance of personal vehicles, it is important to ensure adequate and realistic provision of loading bays. Many businesses do not use cars for their operational vehicles and as per comments in 15.17 the available range of vans is limited. Additionally, residents and businesses will still need to receive deliveries and servicing, even if they choose to live and operate car-free.	Comment noted and it will be taken into consideration when preparing the Proposed Submission Local Plan.

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Policy 72: Managing Vehicle Travel Traffic				
ID	Full Name	Organisation	Comment	Council (Officers) Response
863	Mr Roger Brown	Chair Love North Chingford	Loss of Parking: In the plan and at meetings it was clear that planners totally undervalued the need for adequate parking for the NC centre to thrive as a retail centre. This is reflected in the Area Investment Plan where both the Richmond Road Shoppers Car Park and the Co-Op car park opposite are suggested as housing development sites. We are in direct competition with other retail centres that provide far better parking such as Tesco Highams Park.	Comment noted and it will be taken into consideration when preparing the Proposed Submission Local Plan. The Council acknowledges the need of some levels of car-parking in developments and areas that are less-connected to public transport and there are a number of carpark schemes available for residents to use. The Council seeks to encourage car-free lifestyle in areas that are well connected. Policy 72 and 74 seek that developments improve car parking and vehicle use in the borough.
1077	Ms Alison Blom-Cooper	Planning Department Epping Forest District Council	The Council strongly supports the general thrust of the policies contained in this Chapter, and in particular Policy 72 (Managing Vehicle Travel Traffic) and Policy 73 (Electric Vehicles).	Support of policies 72 and 73 has been noted and comment will be taken into consideration when preparing the Proposed Submission Local Plan.
1195	Rachel Kercani		Will you provide more parking in these new builds as people will still have cars and need somewhere to park them and there's scarcely enough spaces as there is. I know your aim is to encourage people not to have cars but people will still want them.	Comment noted and it will be taken into consideration when preparing the Proposed Submission Local Plan. The Council acknowledges the need of some levels of car-parking in developments and areas that are less-connected to public transport and there are a number of carpark schemes available for residents to use. Waltham Forest Council seeks to encourage car-free lifestyle in areas that are well connected. Policy 72 and 74 seek that developments improve car parking and vehicle use in the Borough.
1254	Rosie Sterry	Transport for London - Commercial Development	TfL CD support part (a) of this policy which seeks to ensure development is car free in accessible locations. This aligns with the DLP 'good growth' principle which seeks to reduce car dependency to improve Londoners' health and make the city a better place to live and shows a strong commitment to accelerating London-wide trends towards car-free and low-car development.	Support noted.

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Policy 72: Managing Vehicle Travel Traffic				
ID	Full Name	Organisation	Comment	Council (Officers) Response
1297	Josephine Vos	Transport for London - City Planning	We strongly support the requirements for car-free development in the south and central areas of the borough. In the north of the borough, we would support standards that are at or below the maximums set out in the draft London Plan.	Support noted and comment will be taken into consideration when preparing the Proposed Submission Local Plan. The Council appreciates the acknowledgment of the new Local Plan approach to encourage car-free lifestyle in areas that are well connected to public transport, and areas less-well connected may require some levels of car-parking.
1298	Josephine Vos	Transport for London - City Planning	We welcome and support the requirement to deliver controlled parking zones where appropriate, as these are a key measure to support the implementation of less car-dependent growth. We accept the policy to re-provide parking spaces to existing permit holders in estate regeneration schemes, but these spaces should be eventually be repurposed to benefit the whole community, and should be located and designed with this in mind.	Support noted and comment will be taken into consideration when preparing the Proposed Submission Local Plan.
1299	Josephine Vos	Transport for London - City Planning	Car clubs can play a role in supporting lower car ownership, when paired with appropriate measures to discourage private cars. The draft London Plan includes car clubs in the calculation of maximum residential standards, which are car-free in outer London PTAL 5-6. However, in lower PTAL in the south and central areas of the borough, car clubs may be able to play a positive role in enabling otherwise car-free development. It may also be worth exploring how car clubs might facilitate developments with low car parking provision in the north of the borough so that space given over to parking is minimised and car use does not become habitual. Evidence shows that the perceptions of alternatives to the car are negatively influenced by regular car use. Therefore it may be possible to encourage households to use a variety of modes through the provision of communal, rather than private, parking.	Comment noted and the strengthening of document wording will be taken into consideration in preparing the Proposed Submission Local Plan.
1328	Ms Claire Stroud		The proposition that a lot of new properties would be car free is a concern - the transport infrastructure is already creaking and you currently can't get from one side of the borough to the	The Council acknowledges the need of some levels of car-parking in developments and areas that are less-connected to public transport and there are a number of carpark schemes

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			other (say Chingford to Leytonstone) without considerable difficulty. Historically many of the residents of Chingford have been trades people - carpenters, builders, etc who use vans (certainly in my street there are several) building car free developments severely limits who can realistically live there.	available for residents to use. Waltham Forest Council seeks to encourage car-free lifestyle in areas that are well connected. Policy 72 and 74 seek that developments improve car parking and vehicle use in the borough.
1412	Blackrock and NEAT Development		The policy supports car free developments in areas which are within the Central Waltham Forest area where the site is located. Operational parking for business and industry will be permitted when need is clearly demonstrated within the Transport Assessment. All operational vehicles should use electric vehicles. This is more onerous than the London Plan and we suggest that the wording of this policy is widened to state all operational vehicles will be encouraged to be electric vehicles.	Comment noted. The strengthening of policy wording will be taken into consideration in preparing the Proposed Submission Local Plan.
1485	Sharlene Sarolli		In particular, I am most concerned about the local schools, GPS and parking. These are already under pressure and this plan will add to the already strained recourses.	Comment noted and will be taken into consideration when preparing the Proposed Submission Local Plan. The Council acknowledges the need to increase the provision of both social and physical infrastructure. This comment is noted when preparing of the Infrastructure Delivery Plan (IDP) that will assess the existing and future need for infrastructures such as Doctor and GP surgeries, transport networks, early years, primary and secondary school facilities in the borough. Policies 55, 57 and 72 seek to ensure and improve timely, strategic and local infrastructure investment and delivery to support good sustainable growth, along with active and sustainable transport choice across the borough.
1874	Miss Susan Murray		In light of the FACT that LBWF will dole out an infinite number of parking permits for a finite amount of spaces how do we know that you won't just subsequently secretly change your minds and start dishing out permits making life a nightmare for all of us?	Comment noted. The Council acknowledges the need of some levels of car parking in developments and areas that are less-connected to public transport and Waltham Forest Council seeks to encourage car-free lifestyle in areas that are well connected. Policy 72 and 74 seek that developments improve car parking and vehicle use in the borough.

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1926			DLP Policy 72 (Managing Vehicle Traffic) p.150 With regards to car parking management, the DLP sets out that applicants should submit a Car Park Management Plan. Often this level of detail may not be known or finalised at the application stage. To ensure flexibility and to avoid amendments to applications, it would be helpful for these management plans to be secured by way of condition. The Policy wording should be updated to reflect this more pragmatic approach.	Comment noted. The strengthening of policy wording will be taken into consideration in preparing the Proposed Submission Local Plan.
1936	Tony Thorne		The current roads are unable to manage the current traffic levels and it is necessary for there to be reform of the current roads to ensure efficient flows of vehicles including removal of unnecessary traffic lights and proper synchronisation of the lights to ensure they do not create congestion as at present.	Comment is noted and it will be taken into consideration when preparing the Proposed Submission Local Plan and the Infrastructure Delivery Plan (IDP).
1937	Tony Thorne		the restrictions of road widths etc need to be removed as they also delay and congest both public and private transport plus unnecessarily increase vehicle emissions. The removal of these obstructions would also assist those who are disabled or of mature years who find that these obstructions, However, carefully constructed and maintained, make it difficult when travelling and particularly on public transport both physically painful and mentally exhausting. In fact the Council could look at the Dutch experiment where they removed all the traffic control arrangements which resulted in a reduction of accidents but this meant acceptance by all road users that they need to use common sense and have a sense of realty when using the roads and pavements which have to be shared with all.	Comment is noted and it will be taken into consideration when preparing the Proposed Submission Local Plan and the Infrastructure Delivery Plan (IDP). The Council has been guided by the TfL Healthy Streets for London report in order to improve pedestrian safety and reduce impacts as well as delivering a liveable neighbourhood for all. We will continue working with TfL and road users to reduce risks and impacts.
1938	Tony Thorne		There is also a need for proper planning of highway and utility maintenance as the streets are a patchwork of repairs interspersed with potholes making it dangerous for pedestrians, especially the partially sighted, cyclists and motor vehicles.	The issue raised is an operational matter relating to the maintenance of the highway network. This is outside the remit of the Local Plan. Accordingly, this comment is noted for referral to other stakeholders directly responsible for the maintenance of such infrastructure.

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2020	Mrs Sharon Henry		What the borough is doing to all these areas are killing local businesses. People are confused as to how to get into and out of surrounding areas, it is stopping people from entering areas by confusing roads and blocking so many that you spend hours driving round trying to find your way back.	Comment is noted and it will be taken into consideration when preparing the Proposed Submission Local Plan. The Council recognises the importance of local businesses and will continue to work, improve and support the provision of affordable workspace in the borough.
2037	Peter Drew		With the new homes, how will local car transport cope with inevitably more cars on the road?	Comment noted. The Council recognises the challenges of delivering new housing developments and the impact on existing road and public transport in order to meet the borough's ambitions for air quality and local environment. Policies 69, 72 and 74 seek to optimise and improve services throughout the Transport Assessment and Travel Plan in order to mitigate and reduce impacts.
2098	Mr Matthew Fletcher	Metropolitan Police Service	Our concerns over Policy 72 - Managing Vehicle Travel Traffic (pgs 150-151) are related to Car Clubs and the potential for sites to include public access within them. The concern is related to the higher potential for misuse of the car parking areas and the excessive permeability into a site they provide (leading to a higher potential for drug dealing, rough sleeping prostitution and ASB within the car parks and possibly further into the design). We would support the use of bays on the highway for this where they are in the public realm and not within a private development.	The Council notes Metropolitan Police Service' response and it will be taken into consideration when preparing the Proposed Submission Local Plan. The Council acknowledges the concern regarding the Car Clubs in future development. Policy 72 seek to encourage a robust evaluation of developments throughout the request of Car Parking Management Plan, Transport Assessment and Travel Plan (when applicable) in order to minimise impacts and risks.
2140	anonymous response form 1		Understanding that elderly/disabled people need their cars.	Comment noted. The Council acknowledges the concern regarding elderly/disabled car parking spaces in future development. Policy 72 seek to encourage a robust evaluation of developments throughout the request of a Car Parking Management Plan in order to minimise impacts and risks.
2170	anonymous response form 3		Get someone to stand at Burry Road in the morning and watch the traffic going through the Borough from Essex and contributing nothing (apart) from pollution. Needs to be diverted left to put them off.	Comment is noted and it will be taken into consideration when preparing the Proposed Submission Local Plan. The Council acknowledges the concern regarding the traffic and road congestion. Policy 72 and 74 seek to encourage a robust evaluation of developments throughout the request of Car

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				Parking Management Plan, Transport Assessment and Travel Plan (when applicable) in order to minimise impacts and risks.
2270		St William Homes LLP	Policy 72 confirms the Council's approach to car free development in the South Area of the borough. Whilst St William are supportive of sustainable transport initiatives and the Council's ambition for car free development, St William also recognise that there can be a practical requirement to deliver on-site car parking for family housing (defined as two bed / four person and three bed homes).	Support noted and comment will be taken into consideration when preparing the Proposed Submission Local Plan.
2271		St William Homes LLP	Supporting Paragraph 15.24 confirms that the Council recognises that less-well connected areas may require some levels of carparking within new development, and this will be reflected within forthcoming maximum parking standards, supported by a robust evidence base. We consider that this supporting text should also include reference to the needs of family housing.	Support of Policy 72, Paragraph 15.24, and comment have been noted. The strengthening of policy wording will be taken into consideration when preparing the Proposed Submission Local Plan.
2287	Unknown Response Form Ref 99 Unknown Response Form Ref 99		There are not enough car spaces for Staff and Patients at Whipps Cross Hospital. There should be better car parking facilities at Whipps Cross Hospital.	Comment noted. Policy 72 of the draft Plan sets out Waltham Forest Council's policy on car parking applicable to all new developments.
2309	Mike Chrimes		While there is some recognition of the different levels of car dependency across the borough, and the requirement to try and reduce emissions, the development plan does not have a solution to these challenges. Local retail businesses in the North of the Borough will continue to rely on the car.	Comment is noted and it will be taken into consideration when preparing the Proposed Submission Local Plan. The Council acknowledges the concern regarding the traffic, car parking and road congestion. Policy 72 and 74 seek to encourage a robust evaluation of developments throughout the request of Car Parking Management Plan, Transport Assessment and Travel Plan (when applicable) in order to minimise impacts and risks.

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ID	Full Name	Organisation	Comment	Council (Officers) Response
2411	Mr Roger Brown	Chair Love North Chingford	Adequate Parking for business. Visitor/Shopping Parking is inadequate, historically very contentious, and plainly compares unfavourably with other retail centres in the Borough and nearby. Planners at recent meetings have made unsupported value judgements advocating building over car parks such as the Richmond Road Car Park for residential units as per Walthamstow. This places business at a direct disadvantage to new housing. Whilst we all support sustainable transport aims, our priority is the economic health of Station Road and around. In the present dire times for retailing, with large fixed overheads, businesses cannot sustain the slightest drop in footfall caused by parking reduction, or even during closures during the redevelopment.	The Council notes the Love North Chingford comment and it will be taken into consideration when preparing the Proposed Submission Local Plan. The Council acknowledges the concern regarding the traffic, car parking and road congestion as well the economic health of Station Road and around. Policy 72 and 74 seek to encourage a robust evaluation of developments throughout the request of Car Parking Management Plan, Transport Assessment and Travel Plan (when applicable) in order to minimise impacts and risks.
2530	Save our Suburbs Petition - supported by 662 signatures	Chingford & Woodford Green Conservatives	Provide for adequate parking to be preserved to support existing businesses and provided in new developments of homes and business premises to protect existing residents' amenity	The Council notes the Chingford & Woodford Green Conservatives comment and it will be taken into consideration when preparing the Proposed Submission Local Plan. The Council acknowledges the concern regarding the traffic, car parking and road congestion. Policy 72 and 74 seek to encourage a robust evaluation of developments throughout the request of Car Parking Management Plan, Transport Assessment and Travel Plan (when applicable) in order to minimise impacts and risks.
2574	Anne Hamshaw		As residents we find it increasingly difficult to park locally to shop, often forced to go further afield. This means polluting the air more with using the car. Parking is already very difficult both in shopping centres and residential streets.	The Local Plan reflects Waltham Forest Council's commitment to TfL's Healthy Streets principles and the Mayor's Transport Strategy to provide low traffic liveable neighbourhoods. The Council is committed to the reduction of private car use in the lifetime of this Local Plan. Policy 72 sets out the thresholds for car parking in the Borough in line with the Intent to Publish London Plan 2019.
2578	Anne Hamshaw		Where will new residents Park and will they bring with them even more commercial lorries which appear to be arriving on our streets as a permanent fixture each day.	The Local Plan reflects Waltham Forest Council's commitment to TfL's Healthy Streets principles and the Mayor's Transport Strategy to provide low traffic liveable neighbourhoods. The

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				Council is committed to the reduction of private car use in the lifetime of this Local Plan. Policy 72 sets out the thresholds for car parking in the borough in line with the London Plan 2019, which includes the contributions that future development may make in the extension of parking controls in the borough.
2582	Peter Carey	London Borough of Waltham Forest	Does the draft Local Plan consider the effects of transport noise fully, in particular, that from road traffic? There are parts of the borough that are significantly affected by road traffic noise, particularly adjacent to the A12 and A406. Arising from the European Noise Directive (END) noise mapping process, there are a number of 'Important Areas' identified relating to road traffic, which are those with the highest levels of exposure to road noise. The current Core Strategy does reference the issues arising from transport noise at paragraphs 16.9-16.11, but these paragraphs are not replicated in the draft Local Plan. More information about END noise mapping can be found here: http://www.extrium.co.uk/noiseviewer.html	This comment will be taken into consideration at the next stage of the Local Plan.
2657	Dr Robert Gay		In my view so-called 'car free' developments are not appropriate in our area. (At the Public Enquiry into the UDP, I was instructed by the Bushwood Area Residents Association to oppose this policy and the Inspector was persuaded to reject it.) People take apartments in such developments in the expectation that they will not need a vehicle, and then they fall in love with someone whose work requires a car (such as an estate agent or a district nurse) or they may become disabled and need a car. There will inevitably be compassionate cases and they will eventually be allowed residents permits and so increase pressure on street parking. Subject to the above I would welcome residential development up to about 6 storeys (perhaps four storeys plus one or two in a mansard) on sites not directly by the Tube line such as Robartes House (the former Jobcentre).	The plan contains policies to manage vehicle traffic and parking. As set out under Policy 72, Waltham Forest Council supports car free development at appropriate location throughout the Borough. This includes locations that are well-connected to public transport, active travel networks and other amenities. The enforcement issues associated with parking permits is noted for further consideration.

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ID	Full Name	Organisation	Comment	Council (Officers) Response
2885	Mrs Antonia Fernand		I appreciate there is a housing issue which needs resolving but this is different to actively encouraging more people to live in the borough which will negatively on road transport/pollution (even if everyone is walking/cycling... there is not enough space for people to store bikes) The plan for high density living is the fundamental flaw in this plan which in my view needs addressing if the other areas of the plan are to succeed in regenerating /continue to regenerating this borough.	Comment noted and it will be taken into consideration when preparing the Proposed Submission Local Plan. The Council acknowledges the need of some levels of car-parking in developments and areas that are less-connected to public transport; and it will continue to encourage car-free lifestyle in areas that are well connected. Policy 72 and 74 seek that developments improve car parking and vehicle use in the borough.

Policy 73: Electric Vehicles				
ID	Full Name	Organisation	Comment	Council (Officers) Response
849	Freight Transport Association		It is important that on-street electric vehicle charging points are accessible by commercial operators and not restricted to private vehicle users only, in line with the recommendations of the Mayor's EV Infrastructure Delivery Plan.	Comment noted and it will be taken into consideration when preparing the Proposed Submission Local Plan.
851	Freight Transport Association		FTA does not want to see punitive charges for commercial vehicle operators.	Comment noted and it will be taken into consideration when preparing the Proposed Submission Local Plan.
852	Freight Transport Association		Incentives should be applied fairly and not discriminate against residents who bring work vehicles back to their homes and will require access to charging facilities.	Comment noted and it will be taken into consideration when preparing the Proposed Submission Local Plan. Policy 73 seeks to improve, reduce and mitigate private car travel depending on the areas and the connection with public transport.
853	Freight Transport Association		FTA is pleased to see recognition that delivery and servicing vehicles will also need to access public charging networks.	Support noted and comment will be taken into consideration when preparing the Proposed Submission Local Plan.
854	Freight Transport Association		The cost of upgrading grid capacity to facilitate the provision of electric charging points can be high and should be included as a key part of delivering charging infrastructure at new developments.	Comment noted and it will be taken into consideration when preparing the Proposed Submission Local Plan.

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Policy 73: Electric Vehicles				
ID	Full Name	Organisation	Comment	Council (Officers) Response
1078	Ms Alison Blom-Cooper	Planning Department Epping Forest District Council	The Council strongly supports the general thrust of the policies contained in this Chapter, and in particular Policy 72 (Managing Vehicle Travel Traffic) and Policy 73 (Electric Vehicles).	Support of policy 73 has been noted and comment will be taken into consideration when preparing the Proposed Submission Local Plan.
1300	Josephine Vos	Transport for London- City Planning	The policy should make a clearer distinction between different use classes, particularly residential (to which the 20 per cent active, 80 per cent passive requirement in the London Plan applies) and non-residential uses. It is not necessary for all destination parking to provide electric vehicle charging and in some cases this could be counter productive (for instance by embedding car use where more space is required for other modes, or providing the wrong type of charging where visits are short and fewer mean faster charging points are more desirable.)	Comment noted and the strengthening of document wording will be taken into consideration in preparing the Proposed Submission Local Plan.
1302	Josephine Vos	Transport for London- City Planning	Part D should refer to supporting the electrification of taxis (at developments where they are expected to be used) as well as deliveries and servicing vehicles	Comment noted and the strengthening of Policy 73 wording will be taken into consideration in preparing the Proposed Submission Local Plan.
1833	Mr John Hugill		With regard to the infra-structure that should also include up rated electrical installation to cater for the increased use of electric cars.	Comment is noted and it will be taken into consideration when preparing the Proposed Submission Local Plan and the Infrastructure Delivery Plan (IDP).

Policy 74: Assessing, Mitigating and Monitoring Transport Impacts				
ID	Full Name	Organisation	Comment	Council (Officers) Response
1303	Josephine Vos	Transport for London - City Planning	The policy should expand on the requirements for transport assessments. In particular, it should not just set out how the development will contribute towards achieving transport objectives, but also identify and quantify potential impacts and how these will be mitigated. The policy should emphasise the	Comment noted and it will be taken into consideration when preparing the Proposed Submission Local Plan. Policy 74 seeks to effectively assess the impact of developments and mitigate them.

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Policy 74: Assessing, Mitigating and Monitoring Transport Impacts				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			importance of fully analysing the impact on transport infrastructure, particularly rail station and line capacity.	
1304	Josephine Vos	Transport for London - City Planning	The policy refers to Construction and Logistics Plans (also referred to in Policy 71). For consistency, the policy should refer to Delivery and Servicing Plans (also referred to in Policy 70).	Comment noted and the strengthening of Policy 74 wording will be taken into consideration in preparing the Proposed Submission Local Plan.
1631	Bob Bennet		The policy appears to require all new developments to be accompanied by a transport assessment. As with policy 71 this is considered to be unnecessary and unduly onerous for minor developments. The policy should include the criteria for the need of transport assessments.	Comment noted. The strengthening of policy wording will be taken into consideration in preparing the Proposed Submission Local Plan.

Policy 75: Utilities Infrastructure				
ID	Full Name	Organisation	Comment	Council (Officers) Response
1233	National Grid		National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales and National Grid Electricity System Operator (NGESO) operates the electricity transmission network across the UK. The energy is then distributed to the eight electricity distribution network operators across England, Wales and Scotland. National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use. National Grid previously owned part of the gas distribution system known as 'National Grid Gas Distribution limited (NGGDL). Since May 2018, NGGDL is now a separate entity called 'Cadent Gas'. To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be	This information is noted.

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Policy 75: Utilities Infrastructure				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			involved in the preparation, alteration and review of plans and strategies which may affect National Grid's assets.	
1928	Tony Thorne		Water. We regularly see leaks in the supplies in Chingford area so this would evidence that there are already major weaknesses in the existing system. Also what work has been done to ensure the sewage and waste water systems are capable of meeting the current demands especially when it is noted that the fall sewers struggle in times of heavy rains and many street drains are blocked due to poor maintenance	Noted. There are detailed capacity studies for fresh, grey and black water provision across London. Thames Water as a statutory consultee has provided a representation as part of the Local Plan consultation process.
1929	Tony Thorne		Gas. Supplies are currently being replaced but I would question if they are being up rated to meet future demands	This comment is noted.
1930	Tony Thorne		Electricity. It would appear that some services are now getting near the end of their useful life and with the introduction of the ULEZ there will be significant increase in current demands for electricity so again one would question what are the plans to meet current demands and what are the projections for the increased demands as a result of these proposals?	The Local Plan will be accompanied by an up to date Infrastructure Delivery Plan when it is published for consultation in 2020.
2219	Lucy Read	Planning Advisor, Sustainable Places Environment Agency	Policy 75 - Utilities Infrastructure - Sewerage infrastructure has not been included in this policy. A requirement that sewerage infrastructure should be included in this policy. - also refer to comment in relation to policy 94.	It is proposed to refer to sewerage infrastructure in Policy 75.
2571	Anne Hamshaw		More homes means more residents who will require all the services including Water, Gas and Electricity. I am told by Thames Water I use too much water for the household, However, they still have water to service all the new properties do they? So will the water supply be sufficient for all?	The Local Plan will be supported by an Infrastructure Delivery Plan, which will set out details of the borough's infrastructure requirements. This document will set out what is needed, where it is needed and when it is needed. It will also set out the delivery mechanism to ensure the timely delivery of infrastructure. This document will be published with the final version of the plan.

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Policy 75: Utilities Infrastructure				
ID	Full Name	Organisation	Comment	Council (Officers) Response
2961	National Grid		Proposed sites crossed or in close proximity to National Grid infrastructure - Following a review of the above development plan, the following sites have been identified as being crossed or in close proximity to National Grid infrastructure. Further details are provided in the table overleaf. Electricity Transmission - Site Ref Asset Details Appendix Ref Lea Valley Regeneration Corridor VC Route - 275Kv two circuit route from Hackney substation in Hackney to Tottenham substation in the Haringey Underground high voltage electricity cable - Hackney to Highbury ET368 Please see enclosed plan referenced ET368 at Appendix 2. The proposed sites are crossed by a National Grid high voltage electricity transmission overhead line and National Grid underground high-voltage electricity transmission cable. The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site. You can find National Grid's guidelines for developing near Over Head Lines here: https://www.nationalgrid.com/sites/default/files/documents/Development%20near%20overhead%20lines_0.pdf	This information is noted.
2962	National Grid		Electricity Distribution - UK Power Networks owns and operates the local electricity distribution network in Waltham Forest Council. Contact details can be found at www.energynetworks.org.uk .	This information is noted.
2963	National Grid		National Grid Asset Guidance - National Grid seeks to encourage high quality and well-planned development in the vicinity of its high voltage overhead lines. Land beneath and adjacent to the overhead line route should be used to make a	This information is noted.

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			positive contribution to the development of the site and can for example be used for nature conservation, open space, landscaping areas or used as a parking court. National Grid, in association with David Lock Associates has produced 'A Sense of Place' guidelines, which provide detail on how to develop near overhead lines and offers practical solutions which can assist in avoiding the unnecessary sterilisation of land in the vicinity of high voltage overhead lines. Potential developers of these sites should be aware that it is National Grid policy to retain our existing overhead lines in-situ. The relocation of existing high voltage overhead lines will only be considered for projects of national importance which has been identified as such by central government.	
2964	National Grid		National Grid requests that any High-Pressure Gas Pipelines are taken into account when site options are developed in more detail. These pipelines form an essential part of the national gas transmission system and National Grid's approach is always to seek to leave our existing transmission pipelines in situ. Please refer to the Health and Safety Executive (HSE) in the first instance. National Grid have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Grid easement strip, and a deed of consent is required for any crossing of the easement. In the first instance please consider checking with the Land Registry for the development area. If you require any further information in relation to the above and/or if you would like to check if National Grid's transmission networks may be affected by your works, please contact National Grid's Plant Protection team via plantprotection@nationalgrid.com or visit the website: https://www.linesearchbeforeudig.co.uk/	This information is noted. The Council is preparing a separate development plan document on site allocations, which will consider site-specific matters.

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Policy 75: Utilities Infrastructure				
ID	Full Name	Organisation	Comment	Council (Officers) Response
2965	National Grid		Further Advice - National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.	This information is noted.
2966	National Grid		In addition, the following publications are available from the National Grid website or by contacting us: <ul style="list-style-type: none"> ☺ A sense of place - design guidelines for development near high voltage overhead lines: A sense of place design guidelines for development near high voltage overhead lines: https://www.nationalgridet.com/document/130626/download ☺ Guidelines when working near NGG assets: https://www.nationalgridgas.com/land-and-assets/workingnear-our-assets ☺ Guidelines when working near NGETT assets: https://www.nationalgridet.com/network-andassets/working-near-our-assets Appendices - National Grid Assets Please find attached in: <ul style="list-style-type: none"> ☺ Appendix 1 provides a map of the National Grid network across the UK. ☺ Appendix 2 provides maps of the sites referenced above in relation to the affected National Grid Transmission assets outlined above. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect our infrastructure. 	This information is noted.

Policy 76: Digital Infrastructure				
2529	Ms Katie Glasgow	Planning Officer Hackney Council	We are also interested in viewing Waltham Forest's Digital and Technology Strategy 2018 to get a better understanding, and how it relates to Hackney. The Strategy is referenced in Paragraph 15.2 of the Plan However, does not appear to be available online.	Noted. Please see the attached link: https://democracy.walthamforest.gov.uk/documents/s63159/Digital%20and%20Technology%20Strategy%20Appendix%20A%20-%20Digital%20and%20Technology%20Strategy.pdf

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Chapter 16: Enhancing and Preserving our Heritage				
ID	Full Name	Organisation	Comment	Council (Officers) Response
111	Sally Slade		Make more of the unique character of North Chingford	Noted. The Local Plan has, through taking into consideration the views of residents and the various studies that have been commissioned, sought to preserve and enhance the unique characteristics of North Chingford whilst delivering the growth that is required in this part of the borough.
112	Sally Slade		The May Day event was very poor	Noted. Thank you for your feedback.
113	Sally Slade		Encourage people into the forest-more guided walks- not just for families and not just mid week- weekends too!	The Mall / Selbourne Park planning application was determined under the 2012 LBWF Core Strategy. The draft plan contains a range of policies to guide new development in local areas. All these policies will be considered in decision making, ensuring that an appropriate balance is maintained between competing objectives - in this case delivering growth and ensuring that new development makes a positive contribution to the local environment by also providing protection to local distinctive features such as trees. The lime tree avenue is to be retained as part of the development.
287	Daf Bergin		I would object to any buildings over the height of the present buildings on Station Road. 3 stories are high enough for this village feel London Village.	Noted. Any application made for a taller building after the Local Plan is adopted will be subject to Policy 63 (Taller Buildings). This policy sets out a strict criteria to which any planning application of this nature would have to adhere to.
288	Daf Bergin		North Chingford should not lose its village feel.	The plan takes into consideration the unique character and feel of North Chingford. Policy 18 "North Chingford" sets out clear objectives for delivering growth in the North Chingford whilst protecting and enhancing its character.
390	Mrs Pauline Whitbread		What guarantees do we have that the Conservation Area will continue to maintain its charm and heritage? I am terrified about the comments about redesignating Green Belt land. Are you going to guarantee that the Assembly Hall area will not be built on hence changing the character of The Green area?	The plan takes into consideration the unique character and feel of North Chingford. Policy 18 "North Chingford" sets out clear objectives for delivering growth in the North Chingford area whilst protecting and enhancing its character. Point 7 ensures that place-making principles that reflect the character and local distinctiveness of North Chingford, particularly taking

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				advantage of the heritage, cultural and green assets. Point 8 protects and enhances the Chingford Green Conservation Area - The Assembly Hall is sited within the conservation area and any proposals that may come forward need to be sympathetic with the characteristics of the conservation area. Green Belt boundary designations will be reviewed for their integrity, this is more of an issue around particular sites on the A406 corridor.
495	Ms Alison Hill		I generally agree with preserving heritage but don't believe there is true commitment. The Central Parade was only saved from a bad design because a preservation order was made first. The fountain at the town hall is going to be flattened. These may not be especially 'conservable' but highlights the attitude, as far as can be seen anyway. Maybe there is more to it than I realise but it would be nice if decisions were more transparent/ made public.	Noted. Any planning application made affecting both designated and non-designated heritage assets are subject to a public consultation. The final decision is made by the planning committee formed by elected members of the council.
544	DNC Haines		It may not be possible to enhance our heritage much, but we ought to keep all that is best and not to demolish degrade or destroy it.	Noted. Any planning application made affecting both designated and non-designated heritage assets are subject to a public consultation. The final decision is made by the planning committee formed by elected members of the council.
578	Mr David Smith		Disagree, Please treat Highams Park in a different manner to plans for South of the Borough - it's a largely different culture and environment, and deserves its own way of being developed, in keeping with the amazing history of Highams Park.	Noted. The differing characteristics between the more urban south of the borough and the sub-urban to rural characteristics of the North of the borough have been captured by assigning them a dedicated section in the Plan. Any planning application made will be subject to public consultation.
865	Mr Roger Brown	Chair Love North Chingford	Wholesale lack of attention to the Historic Setting of North Chingford: We concur with English Heritage in their Direction of Travel response: "We note where the Borough Council is in terms of its Local Plan preparations and as such acknowledge that the policy directions as set out in each section are aspirational rather than a detailed delivery mechanism. As a result, we would reiterate that a significant degree of work remains to be done to develop the policy framework that will realise successful conservation and enhancement of the local	Noted. The Council is still scheduled to undertake a full review of the Chingford Green Conservation Area, as part of its ongoing rolling commitment to reviewing the Borough's conservation area appraisal and management plans.

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ID	Full Name	Organisation	Comment	Council (Officers) Response
			historic environment. "We strongly suggest that this work has not been done here either in the draft plan or on the ground. 16) Conservation Area Review: LNC supports the promised urgent review of the Green Conservation Area plan, it's area extension to The Parade frontage as far as Buxton Road, and improvements to The Parade itself to restore its Edwardian elegance. Note: its extent is incorrectly marked on the AIP draft.	
1047	Mr Tim Brennan	Historic England	Para. 16.3 we consider this section could be used to commit to revising and updating the Borough's Archaeological Priority Areas.	Noted. The Council is committed to periodically reviewing the archaeological priority zones in the Borough. We will publish any update to policy wording in the next draft of the Local Plan.
1063	Mr Tim Brennan	Historic England	Para 16.3 - we note the bullet points relating to the Borough's strategy for the historic environment. We consider this section could be used to commit to revising and updating the Borough's Archaeological Priority Areas.	Noted. The Council will review this suggestion as part of drafting the pre-submission Local Plan.
1079	Mr Tim Brennan	Historic England	Paragraph 185 of the NPPF indicates that 'plans should set out a positive strategy for the conservation and enjoyment of the historic environment'. We note and welcome the various strands of the Borough Council's current strategy for the historic environment as set out at Paragraph 16.3. However, we consider that there are further opportunities that could be considered that would also help achieve such a positive strategy and enable wider social, cultural, economic and environmental benefits as also identified in NPPF para 185. Positive strategy include: a program of public/community engagement heritage at risk - an explicit policy within the Plan to encourage solutions and new investment in HAR a freestanding Heritage Strategy for the borough revising and updating Archaeological Priority Areas updating relevant background and evidence documents	Noted. Support welcome for the Historic Environment Strategy. We will consider the further opportunities with our conservation team and publish any amendments in the next draft of the Local Plan. The Council is in a process of updating its Conservation Area Appraisals and there are other projects that the council is currently working on to protect the heritage assets in the borough and preserve and enhance the historic environment.
1184	Mrs Jean Turpin		There may be scope for some redevelopment in the District Centre where some of the parades on Winchester Road are now looking a bit tired but the overall size of the centre should not be reduced and housing should not be allowed at ground floor level. The existing station building is key to the character	Noted. Any planning application that may come forward in the district centre of Highams Park or the Station building will be judged against the policies in the Local Plan as adopted. The Plan makes reference to the special character of Highams Park and any application made in this area would need to be

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Chapter 16: Enhancing and Preserving our Heritage				
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			and feel of Highams Park and should be retained and not redeveloped; it should be listed.	exceptionally sensitive towards the existing character of the district.
1499	Helen Monger	London Parks and Gardens Trust	LPGT is looking for policies that protect and conserve the borough's heritage assets of designed landscapes such as public parks, grounds of historic houses, churchyards, cemeteries and town squares. We object to the heritage policies which focus on the built heritage. The term "heritage, cultural and green assets" is frequently used but there is no sense that the term heritage assets always includes designed landscapes as well as the built heritage.	Noted. We will seek to include references to designed landscapes such as parks as well as the built heritage.
1512	Helen Monger	London Parks and Gardens Trust	Paragraph 16.8 lacks a policy. Ensure this applies to "any heritage asset". The plan emphasises the value of built heritage so there is some doubt as to the stance the Council will take to protecting and enhancing valued cultural and historic landscapes.	Noted. The council will seek to include references to the designed landscape as well as built heritage assets.
1513	Helen Monger	London Parks and Gardens Trust	Objection Insert policy which applies to protecting and enhancing valued cultural and historic landscapes Amend para 16.7 & 16.8 by inserting historic parks and gardens.	Noted. We will seek to include references to designed landscapes such as parks as well as the built heritage.
1957	Mr Stephen Kelliher		It is also important to consider that Chingford Green is a conservation area with protected properties and protected trees surrounding it. I live in a house which is estimated to be 400 years old. The site of the Chingford Assembly Halls and the Library are immediately next door and have been identified as "game changers". Without assurances that any new proposed buildings would not be taller than the existing structures, nor modern in design and therefore out of keeping with the conservation area, this will face fierce resistance from myself and my neighbours who will demand to know how new high-rise developments can be approved in an area with unique historical characteristics which demand to be preserved.	Noted. The site allocations document will be consulted on separately in 2020. Any development proposals that come forward on this site after the Local Plan and Site Allocations Document has gone through examination and adopted by the council will be subject to a full planning application which will consider the Chingford Green Conservation Area and both the designated and non-designated heritage assets that exist on it.

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Chapter 16: Enhancing and Preserving our Heritage				
ID	Full Name	Organisation	Comment	Council (Officers) Response
2032	Peter Drew		How will character be respected in the borough given the desire for such intense development?	Noted. The character of the area will be preserved through decisions that are made on planning applications that will be informed by the planning conditions that exist in specific areas. For example, conservation areas will have a special set of planning conditions controlling development so any proposal that comes forward in these areas will have to comply with these conditions.
2146	anonymous response form 1		By closing roads the traffic on Church Lane E17 has exploded and is running the ancient buildings of The Arthur Houses Vestry House Museum Spiritualist Church Why has the council sent the traffic which is constant through the oldest buildings in the borough? The alms houses shake everytime a car or lorry comes along. What about conservation?	Noted. The decision to close roads and restrict traffic around the Walthamstow Village area was subject of a planning application that is not part of the focus of the emerging Local Plan. The Council will monitor and review the impact of vehicular access as part of a separate project.
2292	S Bell		It has not been enhancing or preserving the heritage of Waltham Forest to allow building of flats on previously used land for local industry, which gave jobs for local people e.g Fulborne Road, Sutherland Road, Highams Park Tesco area.	Noted. These sites were brownfield land where no viable industrial use proposals came forward. They were re-designated for residential during the previous plan period.
2294	S Bell		It is not protecting the environment to propose to allow the building of immense tower blocks at Walthamstow Town Square- nor will it help the fight against climate change and pollution to see the destination of the trees there	Noted. The proposal on the Town Square site was subject to a full planning application for which the decision was made using the policies and conditions set out in the Adopted Core Strategy of 2012.
2894	Mr Roland Karthaus	member Architects E17	16.2 - it is not realistic to expect that all schemes will make use of design review. It would be very helpful to applicants to outline the parameters for which schemes should use design review - eg. scale, sensitive / historic context etc. It should also be clarified that design review should be used both as a pre-application tool and post-application to inform the planning committee on the submitted scheme. 16.5 all tall buildings should make use of design review	These comments are noted for further discussion.

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Policy 77: Designated Heritage Assets				
ID	Full Name	Organisation	Comment	Council (Officers) Response
646	Gordon Turpin	Highams Park Planning Group	Development should be a maximum of 5 stories in the district centre. Highams Park.	Noted. All planning applications made will be subject to officer review and a public consultation. Policy 63 (Taller Buildings) sets out the planning conditions to which all taller building proposals will have to comply with.
742	Mr. Gordon Turpin		Development should be a maximum of 5 stories in the district centre. Highams Park.	Noted. All planning applications made will be subject to officer review and a public consultation. Policy 63 (Taller Buildings) sets out the planning conditions to which all taller building proposals will have to comply with.
936	Mr Mathew Frith		We support this policy.	Noted. Support welcomed.
1049	Mr Tim Brennan	Historic England	The overall objective of this policy is welcomed.	Noted. Support welcomed.
1050	Mr Tim Brennan	Historic England	Suggest that the first sentence should be amended so that designated heritage assets are 'conserved and where appropriate enhanced'. This would reflect the PPG (see para 002 Ref ID 18a-00220190723).	Noted. Will update the policy in line with the PPG.
1051	Mr Tim Brennan	Historic England	While we welcome paragraphs 16.8 and 16.9 dealing with setting, given that the NPPF is clear that the significance of heritage assets may derive from their setting we consider that the policy wording itself should be amended to include this issue.	Noted. Will seek to include wording amendment in the pre-submission version of the Local Plan.
1052	Mr Tim Brennan	Historic England	This policy should make clear that non-designated heritage assets of archaeological interest that are demonstrably equal in significance to scheduled monuments will be treated as though already designated in planning decisions - see footnote 63 of the NPPF.	Noted. Will seek to include wording amendment in the pre-submission version of the Local Plan to capture the archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.
1053	Mr Tim Brennan	Historic England	The first bullet point under policy 77 appears to suggest that archaeological remains within APAs are designated heritage assets. This is incorrect and should be amended to include the NPPF glossary definition.	Noted. We will amend the policy to include the NPPF Glossary definition.

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Policy 77: Designated Heritage Assets				
ID	Full Name	Organisation	Comment	Council (Officers) Response
1508	Helen Monger	London Parks and Gardens Trust	Only five parks are on the local list in their own right, yet many of the listed or locally listed buildings are in designed landscapes which should be recognised for their own value as designed landscapes (not only as settings for buildings). The LPGT inventory identifies 50 designed landscapes of note in LBWF incl parks, gardens, churchyards, natural areas.	Noted. The Council periodically reviews its heritage assets to assess their inclusion for local listing. We will review the designed landscapes and publish any updates necessary as part of a separate stream of work.
1509	Helen Monger	London Parks and Gardens Trust	Support Policy 81 Object to omission to reference to designed landscapes of parks and gardens in para 16.26.	Noted. Include reference to designed landscapes of parks and gardens.
2167	anonymous response form 3		The Hunting Lodge/ William Morris "attractions" should each publicize their offer.	Noted. This is not an issue covered by the Local Plan.

Policy 78: Listed Buildings				
1054	Mr Tim Brennan	Historic England	To reflect the wording in Part 1, Chapter 1, para 1 (3) of the Planning (Listed Buildings & Conservation Areas) Act 1990, we recommend that clause A of this policy be amended to 'All proposals for listed buildings or development in their setting will be expected to preserve their significance'.	Noted. Amend text to read: All proposals for listed buildings or development in their setting will be expected to preserve their significance.
1870	Mike Chrimes		A map of listed buildings etc would be good with a link to where they can be identified eg Historic England website and LBWF website. It would be useful to indicate how LBWF compares with other London boroughs. My impression is that there is little of interest outside civic buildings so the council has a lot of responsibility. In a national context some buildings may not be significant but Wadham road viaduct, wood street library and the assembly hall are of local significance. I don't know why some Warner properties (11.21) have been considered worthy of 'conservation' status, but not eg the estate by the former gasworks in Lea Bridge Road.	Noted. A GIS layer detailing the boroughs listed buildings exists on the Historic England website. The Council has a list of locally listed buildings available on its website. These are buildings of local significance, and major alteration to, or demolition of, them is a planning consideration when a planning application is made. As local listings are made by the Council, this is not bound by the secretary of state.

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Policy 77: Designated Heritage Assets				
ID	Full Name	Organisation	Comment	Council (Officers) Response
1873	Mike Chrimes		Listed buildings-there needs to be active pursuit of this policy with some illustrated examples of good practice	Noted. The policy will be actively pursued when the plan is adopted.

Policy 79: Conservation Areas				
ID	Full Name	Organisation	Comment	Council (Officers) Response
937	Mr Mathew Frith		We support this, but recommend in Part D should be amended to 'Preserve any tree or any group of trees which'	Noted. Support welcomed.
1875	Mike Chrimes		The Council should consider extending conservation areas to include redundant buildings and sites where strict planning advice could enhance the fringe of the conservation area.	Noted. The Council is reviewing the Borough's conservation area boundaries as part of a separate work stream.
1956	Mr Stephen Kelliher		It is also important to consider that Chingford Green is a conservation area with protected properties and protected trees surrounding it. I live in a house which is estimated to be 400 years old. The site of the Chingford Assembly Halls and the Library are immediately next door and have been identified as "game changers". Without assurances that any new proposed buildings would not be taller than the existing structures, nor modern in design and therefore out of keeping with the conservation area, this will face fierce resistance from myself and my neighbours who will demand to know how new high-rise developments can be approved in an area with unique historical characteristics which demand to be preserved.	Noted. Conservation areas and nearby statutorily listed buildings are a material consideration for any planning application.

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Policy 80: Archaeological Priority Zones				
ID	Full Name	Organisation	Comment	Council (Officers) Response
1056	Mr Tim Brennan	Historic England	While this policy is fine in so far as it deals with APAs, we are concerned that it would appear to indicate that archaeology within the borough will only be found within their defined boundaries. We would again point out that these areas somewhat out of date with consequent implications in relying on them, while we consider that there are also risks in assuming that there is no archaeological resource across the rest of the Borough.	Noted. Will seek to include wording amendment in the pre-submission version of the Local Plan to capture the archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point
1058	Mr Tim Brennan	Historic England	Para 16.24 - We recommend that there is a commitment on the part of the Borough Council to consult with GLAAS on all relevant schemes/ applications and a recognition of the role of GLAAS as advisers to the Council.	Noted. The Council will consult GLAAS on all relevant schemes / applications.
1060	Mr Tim Brennan	Historic England	Paragraph 16.25 It would be helpful if the consultation of criteria for GLAAS were reproduced at this point.	Noted. The Council will consult GLAAS on all relevant schemes / applications.
1074	Mr Tim Brennan	Historic England	The Archaeological Priority Areas in the borough are now very much out of date and are in need of revision and updating.	The Archaeological Priority Areas in the borough are scheduled to be updated as part of a future project.
1075	Mr Tim Brennan	Historic England	The text in the draft Plan appears to treat these areas as authoritative with regard to the potential archaeological resource - given this, we do not consider this area of the Plan reflects the NPPF requirement, or indeed para 7.1.9 of the draft London Plan which is explicit in its expectation that London boroughs should develop up to date archaeological priority areas to aid plan-making and decision-taking.	Noted. Will seek to include wording amendment in the pre-submission version of the Local Plan to capture the archaeological interest in non-designated heritage assets if they hold, or potentially hold, evidence of past human activity worthy of expert investigation at some point.
1088	Mr Tim Brennan	Historic England	We note there are a number of inaccuracies and potential misunderstandings with regards to archaeology - to the extent that we do not consider the draft Plan to be consistent with national policy. For example, the text on page 159 suggests that archaeological remains in APAs are designated assets, while para 16.23 appears to conflict with the NPPF's requirements	Noted. We will review this policy and update it to include "before the point of application". Page 150 comment - Alter so that archaeological remains outside the APA are captured.

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Policy 80: Archaeological Priority Zones				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			(para 189) that evaluation and assessment of archaeological remains should happen before the point of application.	
1876	Mike Chrimes		I'd like to see a map of Archaeological significant zones. There are old road routes/ferry and bridge sites across the marches, and the sites of large old houses and arms, are they located?	Noted. Producing an Archaeological map of the borough does not fall under the remit of the Local Plan. Archaeological studies of the borough will inform site allocations coming forward in the plan and where necessary individual planning applications.

Policy 81: Non-Designated Heritage Assets				
ID	Full Name	Organisation	Comment	Council (Officers) Response
1062	Mr Tim Brennan	Historic England	Paragraph 16.26 - this paragraph should make clear that archaeological remains can be non-designated heritage assets.	Noted. Will seek to include a wording amendment in the pre-submission version of the Local Plan to capture the archaeological interest in non-designated heritage assets if they hold, or potentially hold, evidence of past human activity worthy of expert investigation as part of a separate workstream that will feed into the Local Plan.

Policy 82: Locally-Listed Buildings				
ID	Full Name	Organisation	Comment	Council (Officers) Response
1510	Helen Monger	London Parks and Gardens Trust	Object to Policy 82 which only applies to locally listed buildings. Insert reference to locally listed landscapes in Policy 82, Paras 16.27, 16.28	This is noted. It is proposed to include a policy on Parks and Gardens of Historic Interest- carried from the current Local Plan (Core Strategy and Development Management Policies).
1511	Helen Monger	London Parks and Gardens Trust	Welcome intention to prepare SPD	Noted. Support welcome.
2512	Miss Victoria Manston	Berkley Home North East London	We would encourage greater flexibility within "Policy 83 Locally Listed Building" and consider that proposals for alternation or demolition should be decided by taking a balanced judgement,	Noted for consideration. The Council is seeking to maintain a strong position on the its Locally Listed buildings as although they not statutorily designated heritage assets, locally listed

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Policy 82: Locally-Listed Buildings				
			having regard to the significance of the heritage asset and the scale of any harm or loss.	buildings contribute strongly to the character of the area and help with familiarisation and placemaking.

Policy 83: Highams Area of Special Character				
ID	Full Name	Organisation	Comment	Council (Officers) Response
432	Mrs Janet Charlesworth		The photograph associated with point 16.29 is not within the Highams Park Area of Special Character but of the Broadway in Highams Park District Centre. I am a little concerned that this is symptomatic of an unfamiliarity with sections of the borough by those making the policies. It seems all the more important you engage fully with the Highams Park Planning Group and any such groups in other areas of the borough to make sure you really are familiar with the ground and with local people's views.	Noted. Amend photograph to show one taken within the Highams Area of Special Character.
613	Nicholas Larkin		We also support the retention of Highams Park library and believe that this valuable asset should expand it's hours and use by the community.	Comment noted and support welcomed.
719	Mr. Gordon Turpin		ii Meeting on the 5th April 2019 LBWF suggested delaying the Examination of the HP Plan until after the then pending consultation on the Draft Local Plan due to sites identified by the Plan could conflict with those in the HP Plan. Scant details on sites being put forward for development. Why are brownfield sites in Highams Park identified by LBWF as sites for development are not included in the updated Brownfield Register.	Noted. There are no sites identified in the Local Plan. The Site Allocations Document is part of a separate project and will be consulted on in 2020.
1877	Mike Chrimes		Policy 82- Highams area- one could say the council should work with residents across the borough to identify other such areas.	Noted.

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Chapter 17: Protecting and Enhancing the Environment				
ID	Full Name	Organisation	Comment	Council (Officers) Response
21	Ms Abigail Woodman		Apropos of my initial comment, it looks as if protecting and enhancing the environment is an important part of the local plan - and that is to be welcomed - but I think it should weave its way through all other policies. It is far too easy for environmental policies to be ignored when they are collected together in their own section. Each section should end with an environmental policy that clearly states how the previous policies in that section should be interpreted to ensure they are environmentally sensitive and responsive to the climate emergency.	The plan contains a range of policies to guide new development. Although these are set out under different topic areas, all of these policies are considered in decision making, ensuring that an appropriate balance is maintained between competing economic, social and environmental objectives.
40	Lynn Ferguson		There must be no development in any way affecting Green Belt. Including development affecting views/skyline	Noted. For consideration. Other than strategically protected viewing corridors, views are not a material planning consideration. There is no plan to release the Green Belt to deliver growth in the Local Plan. Impact of development on the skyline will be considered if or when a planning application for a taller building comes forward.
139	Helen Lerner	Walthamstow Village Residents Association	I run Walthamstow Village in Bloom and am part of the RHS & Wildlife Trusts "Go Wild" campaigns. I am sure this is already being considered, as part of the Mayor London's Policy G5 Urban Greening, but would like to reiterate the vital importance of using plants and trees as part of the high density new-build designs, such as the awe inspiring Bosco Verticale in Milan.	The need for urban greening measures is acknowledged in the plan. In particular, see Policy 62(K) which seeks to encourage high quality landscaping, tree planting and urban greening measures in new development and also Policy 92 (H) about maximising urban greening, blue and green infrastructure measures and incorporating 'living building' principles into new and existing developments.
140	Helen Lerner	Walthamstow Village Residents Association	I would also ask you to please consider that the specifications to bidding architects state that brickwork and vertical surfaces contain integrated boxes for bats, swifts, starlings and sparrows. Please see the dissertation attached.	This point is noted. It is proposed to strengthen Policy 84 (Green Infrastructure and the Natural Environment) to include a requirement for biodiversity measures as suggested.
183	Anthony Thorne		Building on a flood plain with the obvious problems relating to flooding.	Comment noted.

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184	Anthony Thorne		The building of properties causes changes in the natural water table resulting in things like increase surface water which the drains are unable to cope with especially when there are heavy rains. Also structures can cause problems with natural air flows creating problems with emissions not being dispersed etc	It is possible to apply necessary mitigation measures to address the issues raised. The plan contains a range of policies to guide new development in local areas. All of these policies will be considered in decision making, ensuring that an appropriate balance is maintained between competing objectives - in this case delivering growth and ensuring good management of surface water drainage, emissions, natural air flows etc. See Policies 62 (Delivering High-Quality Design), 94 (Water) and 96 (Flood Risk).
243	Valerie Muscutt		As above (Health and Well-being)- plus adult education in arts+crafts for example + gardening	Comment noted.
443	Mr Jeremy Clayden		Why does the list of parks not include all the parks in the borough? All parks should be protected and listed as protected.	Comment noted. The list of parks will be reviewed and it will be taken into consideration in preparing the Proposed Submission Local Plan.
448	Mrs Krysia Sivyer		Essential to protect forest land. Already some of it in North Chingford is now being used for car parking.	Comment noted and it will be taken into consideration when preparing the Proposed Submission Local Plan.
472	Ms Alison Hill		Generally I agree with the policies but it is hard to understand fully. I am glad you want to retain and protect allotments. I think that building on Green Belt should Never be allowed. We have a green borough so lets keep it that way and be proud. There is a lack of green space in the centre and south of the borough compared with the rest so what is there must be preserved and all new builds should include a green area. I know there is a commitment to plant more trees but these take years to develop so we must stop cutting down mature trees.	Support noted. The plan contains policies to open spaces and trees as covered under Policies 84, 86(g) and 62(b).
496	Ms Alison Hill		Generally agree we must preserve all green spaces and maintain sports fields. Under no circumstances should the Green Belt be developed or 'improved'	Support noted and comment will be taken into consideration in preparing the Proposed Submission Local Plan.

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507	Mr Len Welson		I agree with this Strategic Objective and believe that Lea Bridge Pocket Park and the two adjoining Station sites should be retained as public open space. As regards the proposed Policy 85 (Green Space and Natural Environment) the existing Metropolitan Open Land boundaries should be retained, particularly in relation to Leyton Marsh and Walthamstow Marshes, around the Lea Valley Ice Centre; the Waterworks Centre and the Thames Water Depot along Lea Bridge Road. In respect of the proposed policy 86 (Open Space and Recreation), I call upon the Council to retain the three existing areas of public open space at the junction of Lea Bridge Road, Orient Way and Argyle Avenue including the Lea Bridge Pocket Park) as an asset for the local community and contributing to the quality of the environment in the area.	Supported noted and comments has been taken into consideration.
518	Mrs Claire Ford		More investment is needed in maintaining parks and nature reserves in the borough. Contractors need to be held accountable and fined when they do not complete a request in a reasonable amount of time or when they make a mistake. There needs to be more joined up working between parks officers, tree officers and grounds maintenance staff, alongside community groups.	Comment noted for consideration.
545	DNC Haines		it should be possible to preserve and protect our trees, open spaces etc, and to reduce levels of air and noise pollution. This should help to reduce asthma, mental stress, crime etc.	Comment noted. The plan contains policies to open spaces and trees as covered under Policies 84, 86(g) and 62(b).
549	Claire Weiss		The currently occupied site of 150 Lea Bridge Road (ex Thames Water Depot) is a beautiful riverside piece of land. Here the river is natural and un-navigated. The site would be ideal for a variety of uses including long terms food -growing on an organised scale similar to Organic Lea further north.	Comment noted.
697	Stuart Edwards		Not at the expense of trees, open spaces and natural landscapes or setting of our historic buildings - what does resilient and creative mean anyway?	Chapters 16 (Enhancing and Preserving Our Heritage) and 17 (Protecting and Enhancing the Environment) set out Waltham Forest Council's approach to ensuring that trees, open spaces,

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				natural landscapes and historic buildings are protected and where possible improved. In view of the targets set in the London Plan and by central government, through the Local Plan the Council is seeking to create the conditions for creative approaches to community building and the protection of the environment.
917	Mr Mathew Frith		Part L: We welcome and support this.	The Council notes the statement of support provided on Policy 19.
965	The City of London	The Conservator's of Epping Forest	The City Corporation would also challenge the Borough to broaden the ambition demonstrated around housing and employment extending this resolve to the protection of the Epping Forest Special area of Conservation (SAC); and the continuing expansion of new and restored Greenspaces, allowing the Borough to maintain its pre-eminent position regarding the high levels of greenspace provision for its citizens.	This point is noted. The Council recognises the need to draw greater attention to the issues relating to Epping Forest and the need to apply necessary mitigation measures. It is proposed to review Policy 87 and where necessary include a substantive policy on Epping Forest Special Area of Conservation.
993	The City of London	The Conservator's of Epping Forest	The City Corporation welcomes parts of the statements made at 17.1 through 17.5, particularly the recognition of the importance of green and blue infrastructure. The City Corporation is However, concerned that the Local Plan's strategic objective for the natural environment is surprisingly narrow and fails to recognise a range of ecosystem services beyond those associated with public access.	This point is noted for consideration.
1023	Ms Alison Blom-Cooper	Planning Department Epping Forest District Council	It would be helpful if there was a commentary regarding the geographic extent of the EFSAC i.e. that it lies within the administrative areas of LB Waltham Forest, LB Redbridge and Epping Forest District. This would be a valuable acknowledgement of its' importance and set the relevant policies in context.	This point is noted. It is proposed to include a commentary in the plan to acknowledge the role of EFSAC and the need to ensure its protection.
1024	Ms Alison Blom-Cooper	Planning Department Epping Forest	It would be helpful to provide commentary as to how much land is designated as either SAC or SPA/Ramsar within the	This point is noted for consideration. It is proposed to include this information.

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		District Council	London Borough of Waltham Forest in the same way that Green Belt, MoL and other designations and uses have been identified.	
1025	Ms Alison Blom-Cooper	Planning Department Epping Forest District Council	In order to assist applicants, the Council suggests that recognition is given within the Draft Plan of the current issues affecting the EFSAC in relation to both recreational pressures and air quality, both of which are well known. Furthermore, commentary regarding the qualifying features of, or the conservation objectives for, the EFSAC would be helpful.	This point is noted. It is proposed to include a commentary acknowledging the issues affecting EFSAC to justify the policy approach taken.
1026	Ms Alison Blom-Cooper	Planning Department Epping Forest District Council	EFDC recognises the challenges facing the London Borough of Waltham Forest in terms of providing access to natural green space and this has resulted in a strong emphasis in both Chapter 17 and other chapters of the draft Local Plan, on increasing public access to the Forest. Whilst this is a laudable aim, such access is likely to add additional pressure on parts of the EFSAC both within and outwith the LB Waltham Forest administrative area.	The plan will be supported by a Habitats Regulations Assessment. This will consider the likely implications of growth on EFSAC. The Proposed Submission version will include appropriate policies to address necessary mitigation measures.
1028	Ms Alison Blom-Cooper	Planning Department Epping Forest District Council	Recognition within the Draft Plan that there is a need to work in cooperation with other local authorities in order to take a strategic approach to managing any such effects would help with regard to the Duty to Cooperate requirements. This appears to be an oversight given the significant work that has been undertaken thus far to develop a joint approach in recognition of the fact that this is a strategic cross-boundary issue of great importance. EFDC notes that reference has been made to working in cooperation with both Natural England and the Conservators of Epping Forest. EFDC considers that this should be addressed both on a 'Duty to Cooperate' basis, including through a Duty to Cooperate Statement of Common Ground, and within the Waltham Forest Local Plan itself. EFDC welcomes the opportunity that is being provided outside of this consultation to discuss this proposition further.	This is noted. The Council has been engaging with EFDC, Natural England and Conservators of Epping Forest and is willing to agree a Statement of Common Ground with these bodies.

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1030	Ms Alison Blom-Cooper	Planning Department Epping Forest District Council	Such a strategic cross boundary approach was recommended in the Habitats Regulations Assessment to support the emerging London Plan as a way of mitigating future likely significant effects.	The Local Plan will be supported by a Habitats Regulations Assessment.
1031	Ms Alison Blom-Cooper	Planning Department Epping Forest District Council	At present Chapter 17 does not clearly set out the hierarchy of 'importance' of the different nature conservation designations or the different tests that apply to each of these.	This comment is noted for further discussion and for clarification.
1093	Milena Petrovic	Sustainable Development Officer Thames Team Natural England	We direct the council to Policy NRM6: Thames Basin Heaths Special Protection Area for an example of how to word a policy on a strategic solution. We would expect there to be a policy commitment to contributing towards mitigation measures set out in the Epping Forest mitigation strategy and the policy should also state that this should be in place by the time the Local Plan is adopted. Where appropriate, contributions from developments will be secured towards mitigation measures identified in the Recreational Impacts Epping Forest Mitigation Strategy which will be completed by the time the Local Plan is adopted. Prior to completion of the Mitigation Strategy the authority will seek contributions, where appropriate, from proposed residential development to deliver all measures identified (including strategic measures) through project level HRAs, or otherwise, to mitigate any recreational impacts in compliance with the Habitat Regulations and Habitats Directive. Contributions will also be sought to address any in combination air pollution impacts.	Noted. The Habitats Regulations Assessment (HRA) is being prepared in line with the next publication of the Draft Local Plan. The Council is expecting to include additional policy wording to address the mitigation measures set out in the Epping Forest Mitigation Strategy.
1492	Helen Monger	London Parks and Gardens Trust	LPGT is concerned that the plan objectives to protect the Green Belt and meet housing targets are undeliverable. Eg policies 17, 22, 84 A i & ii, B v.	The Plan seeks to protect Green Belt. The delivery of housing growth targets as included in the plan does not involve the loss of Green Belt land as the Plan seeks to make effective use of brownfield land. Where references have been made to the

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				review of Green Belt boundaries, this will be reconsidered for better clarity and interpretation.
1493	Helen Monger	London Parks and Gardens Trust	The community is being asked to agree to a principle of building on Green Belt without knowing the full implications. We feel the community is being asked to sign up for a future where there may be unforeseen consequences	Noted. This Plan does not make any site allocations. The Site allocations documents are will be published and consulted on as part of a separate consultation process. A Green Belt site that was highlighted for potential delivery was removed from the site allocations document.
1494	Helen Monger	London Parks and Gardens Trust	Land which is currently brownfield was included in the Green Belt for a purpose. Can it now provide the open space requirements of the new developments through good design rather than be de-designated? What will be the overall effect on the remaining Green Belt of de- designation eg fragmentation, landscape value, openness?	This point is noted for consideration. The plan seeks to ensure the provision and enhancement of existing open spaces. It is proposed to review Policy 84 for better clarity and interpretation.
1495	Helen Monger	London Parks and Gardens Trust	GB/MOL in the urban fabric is not a land bank for future development but a necessary infrastructure to provide a green lung for the city - Land in LBWF serves a local value as well as a strategic purpose to the structure of London as a whole.	This comment is noted. The Council acknowledges the value of green infrastructure, GB and MOL which it is overall seeking to protect and enhance.
1497	Helen Monger	London Parks and Gardens Trust	We support strategic GB/MOL policy but feel the detailed policies which presuppose the release of designated land are inconsistent and make the housing figures undeliverable at this stage	Noted. Support welcomed. The Local Plan does not allocate sites as this will be the subject of a Sites Allocation document which will be consulted in 2020.
1498	Helen Monger	London Parks and Gardens Trust	Para 17.6 states "brownfield land which has previously been in industrial use, primarily in areas such as Lea Bridge and on the fringe of the North Circular to the west of the borough. It rather depends on the circumstances of the brownfield land having been designated. Was development allowed despite its designation or was designation intended to lead to environmental improvements once the land was no longer needed for industry?"	It is proposed to review Paragraph 17.6 for better clarity and interpretation.

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1984	Simon Hughes		This site should be protected from development and opened up to public access, re-imagined as a place for wild swimming and community horticulture, with the vital habitat along the river designated as a nature reserve and connected to the neighbouring Middlesex Filter Beds Nature Reserve and other parts of the site left to 're-wild'. The existing concrete slab could easily be removed in some areas and to reveal the buried filter beds below. A swimming / pond area should be created from a section of the old filter bed, reimagined as a place for wild swimming . The site should be re-wilded, allowing nature to reclaim the built environment naturally in some places and replanting and landscaping in others. The site should be a space for people to learn how to live harmoniously with nature, perhaps through small-scale good growing or sustainable foraging or a social enterprise or community garden centre like Growing Concerns in Tower Hamlets or Living Under One Sun sites in Haringey . It should be a place to showcase the area's industrial heritage by retaining and site's historic buildings. It is a valuable part of the green lung, linking the Middlesex Filter Beds and the Essex Filter Beds and should be reconnected to the surrounding sites. Retaining an area of public hard landscaping would complement the surrounding area.	No allocations are made as part of the Local Plan which is supported by a Green Belt and Metropolitan Open Land Study (2015-2019). The proposals to re-wild the area are noted. The council is committed to maintaining the sensitive balance between the need for development and the protection of Green Belt and MOL.
2061	Stonecrest Marble Ltd Stonecrest Marble Ltd	Stonecrest Marble Ltd	Land at Harbet Road, Chingford was reviewed as site GB32. The review assessed the site against the five purposes of the Green Belt, ultimately concluding that the site could be considered for removal from the Green Belt.	The recommendations from the Green Belt/MOL study is noted. Policy 84 sets out the policies that will apply in considering proposals located in designated Green Belt/MOL areas. It is proposed to review this policy for better clarification and interpretation.
2223	Lucy Read	Planning Advisor, Sustainable Places Environment Agency	Welcoming of the boroughs aim for Chapter 17 to 'enhance the Borough's natural environment and develop a multi-functional network of green and blue infrastructure to deliver benefits for all'. There is less focus on Blue infrastructure and recommend the importance of delivering green and blue infrastructure in particular green and blue corridors and the need for high	Noted. Support welcomed. The next iteration of the Local Plan will include findings of both the HRA and the Green and Blue Infrastructure Strategy.

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			quality habitats is explored further. 17.1 There should be further amendments made to recognise areas of water environment with ecological value including rivers, streams, and ditches, ponds, and lakes and all wetland habitats to ensure they are conserved and enhanced. 17.2 Note that the boroughs blue spaces and waterbodies have not been included. Ching, Lee, Lee Navigation, Lee Flood Relief Channel and Dagenham Brook all be listed as main rivers.	
2296	Mike Edwards		Re-use old and disused buildings. Do not demolish landmark buildings or cut down mature trees.	The Plan seeks to make efficient use of underused land. Policies in the plan seek to protect heritage assets. In particular see Chapter 16 of the Plan. Policy 86 (Biodiversity and Geodiversity) includes a policy requirement to protect trees.
2297	AnonAB		Stop building blocks of flats - we need more open spaces.	The need for more open spaces is noted. However, Waltham Forest Council needs to plan for housing growth to meet identified need as required by national planning policy (NPPF) and the London Plan.
2402	Ms Patricia Braga		Do not build on the green and ruin the character.	Noted. Building on Green Space will be generally resisted where possible.
2423	Tele Lands Improvement Ltd		There is no Habitat Regulations Assessment available for the Draft WFLP on the Waltham Forest website and therefore there is no assessment on whether the Draft WFLP can rule out likely significant effects on Epping Forest SAC, as required under the Habitat Regulations 2017. At present the Draft WFLP is therefore not legally compliant with the Habitats Regulations.	The Council is currently preparing a Habitats Regulations Assessment to support the plan. It will be published ahead of the Regulation 19 Consultation for the Local Plan which is scheduled for Autumn 2020.
2459	Christine Foster		In your Plans for Waltham Forest in General you talk about - Quote OPEN SPACE STRATEGY - The provision and Management of open spaces to enhance the quality of life in the Borough - so why take away the "Open Space" - in Walthamstow High Street which is used a lot by the public and EVEN the Council have held events there this year. You intend to fell the avenue of trees which have been there for hundred years and replace	In practice, development proposals are considered in accordance with the development plan. The Plan contains a range of policies to guide new development in local areas. All of these policies are considered in decision making, ensuring that an appropriate balance is maintained between competing objectives - in this case delivering growth and ensuring that

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			with loads of little squares. Also PROTECTION & ENHANCING THE ENVIRONMENT - Loss or damage to trees should be avoided where possible - Existing trees are important for their biodiversity and in particular "VETERAN TREES". Words come easy but you are determined not to carry out what you preach.	new development makes a positive contribution to the local environment.
2549	The City of London	Department of the Built Environment City of London	The City Corporation encourages the Borough to adopt the SANGs initiative as part of the Local Plan approach to delivering housing close to SACs. If SANGS are offered, they must be real and deliverable, not hypothetical.	This is noted for consideration.
2912	Barts Health NHS Trust		Protects and enhances the significance of Epping Forest whilst improving access and capitalising on it as a visitor attraction. Epping Forest is an important natural asset that is now designated as a SAC. Natural England's Interim Guidance ² makes clear that increased usage may not be consistent with its conservation. Rather, it seeks to mitigate recreational pressure impacts through a combination Strategic Access Management Measures ('SAMMs') and Suitable Alternative Natural Greenspace. In this instance Barts considers that the Local Plan should seek for SAMMs to be integral to the planning of the Whipps Cross Hospital site, that opportunities be explored to create alternative recreational space on the Hospital site, and that residents and visitors will be able to easily access interpretive and educational material to inform them about the Forest's importance and thus enable them to enjoy their local area in ways that are consistent with the conservation of the Forest. Barts therefore request that "whilst improving access and capitalising on it as a visitor attraction" be deleted and replaced with the requirements for a SAMMs strategy.	This comment is noted for further consideration.
2920	Christine Foster		This Borough goes on about "Pollution" - do you not think that all these High Rise High Density properties contribute to that. If more homes have to be built people want Houses with Gardens. Why are the flats all the same dreary Yellow Brick and same style - no character in them? Waltham Forest has lost its	In practice, development proposals are considered in accordance with the development plan. The plan contains policies to guide the development of high-rise buildings in local areas (See Policy 63). Other policies of the plan also seek to protect local character and create attractive neighbourhoods by

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			cosy community feeling. While I am here - do you intend renaming the Borough Also - to "THE FOREST" ?? why was that needed this year of "Culture" !!!!! Mind you if you keep going we will not have a FOREST Regardless of what the Public say you will carry out your plans. And to hell with what the Public think.	encouraging high quality standards in design and architecture (Policy 62). All of policies of the plan are considered in decision making, ensuring that an appropriate balance is maintained between competing objectives - in this case delivering growth and ensuring that new development makes a positive contribution to the local environment.
2967	Tele Lands Improvement Ltd		Lands Improvement do not consider that the Draft WFLP and associated evidence base currently available, is strong enough to support a conclusion of no likely significant effects on Epping Forest SAC particularly in respect to recreation pressure, on the following basis: It does not provide sufficient policy support for the protection of the Forest, nor does it identify that under the Habitat Regulations, Waltham Forest has a duty to protect and enhance the natural environment (outside of planning applications); It does not identify any mitigation (SAMMs or SANGs) to help alleviate recreation pressure as a result of new development in the Borough; and It does not confirm that the additional growth could be achieved without placing further recreation pressure on the Forest.	This point is noted. It is proposed to review and update the draft Local Plan to incorporate new evidence since the plan was published. It will include the findings of the HRA currently being undertaken.
2968	Tele Lands Improvement Ltd		With respect to the proposed policies in the Draft WFLP, it is noted that: The duty to protect Epping Forest is not identified in the Strategic Objectives of the Plan.	This point is noted. It is proposed to review and update the draft Local Plan to incorporate new evidence since the plan was published. It will include the findings of the HRA currently being undertaken.
2969	Tele Lands Improvement Ltd		Policy 4 Ensuring Good Growth: This is silent on the requirement to consider the impacts of growth on Epping Forest SAC and this should be updated accordingly.	It is proposed to review and update Policy 4 to take account new information since the draft plan was published.
2970	Tele Lands Improvement Ltd		None of the Area Policies for the South, Central and North Areas (Policy 6, Central Waltham Forest (no policy number) and Policy 17) identify the need to consider the impacts of growth on Epping Forest SAC and this should be updated accordingly. None of the Strategic Local Policies (Policy 7, 8, 9, South Leytonstone Strategic Location (no policy number), 10, 11, 12,	It is proposed to review and update the draft Local Plan to incorporate new evidence since the plan was published. It will include the findings of the HRA currently being undertaken.

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			13, 14, 15, 16, 18, 19, 20, 21 and 22) identify the need to consider the impacts of growth on Epping Forest SAC and these should be updated accordingly.	
2971	Tele Lands Improvement Ltd		Policy 84 is silent on Epping Forest SAC. Whilst Part H of Policy 86 references the need to consider the effect on SACs (in general, it does not identify Epping Forest SAC specifically), this policy relates to biodiversity and geodiversity impacts and does not address recreational pressure aspects. Whilst Paragraph 17.13 identifies that there is a statutory requirement to consult Natural England on any development that can affect protected sites, there is no pre-able or policy which identifies that applications will be required to submit a site-level HRA to identify and mitigate likely significant effects or include a caveat that the competent authority (i.e. the LPA) is likely to undertake an Appropriate Assessment to determine that mitigation will be effective such that the proposal will not adversely impact the integrity of the SAC.	It is proposed to review and update the draft Local Plan to incorporate new evidence since the plan was published. It will include the findings of the HRA currently being undertaken.
2972	Tele Lands Improvement Ltd		Policy 87 is weak as it is not clear when a development is considered to affect Epping Forest SAC or how close in proximity is in Part D. Given that Natural England have identified that all new residential development within the ZOI is likely to have an effect, and that Waltham Forest lies wholly within this ZOI, all new development in Waltham Forest is likely to trigger assessment under Policy 87 and under the Habitat Regulations. However, this is not clear in Policy 87 and specific reference should be made to the ZOI for Epping Forest SAC (6.2km at present but may be revised after a Summer 2019 Visitor Survey of Epping Forest SAC).	It is proposed to review Policy 87 to incorporate new evidence since the plan was published, in particular the findings of the HRA currently being undertaken.
2973	Tele Lands Improvement Ltd		Furthermore, Policy 87, as written, makes no reference to the need to mitigate against recreational pressure on Epping Forest SAC as a result of new development, either by SAMMs, SANGs or alternative open space provision as identified in Natural	It is proposed to review and update Policy 87 to refer to mitigation measures as may be required in accordance with the findings of the HRA currently being undertaken.

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			England 's letter dated 6 March 2019 It is noted that recreational pressure is different to visitor enjoyment , and Part B of Policy 87 does not address this issue.	
2974	Tele Lands Improvement Ltd		With respect to the type of mitigation required, Paragraph 17.22 identifies that development which results in the creation of new dwellings will be expected to contribute to the mitigation of recreational impacts through financial contributions as set out in the Planning Obligations Supplementary Planning Document. However, review of this SPD, the Waltham Forest Strategic Infrastructure Plan and the CIL Draft Infrastructure Projects List (January 2019) which was out for public consultation in March 2019, reveals that there are no SAMMs or SANGs measures identified within any of these documents.	This point is noted. Subject to the findings of the HRA and the policy approach taken to address mitigation, other documents as mentioned will be updated as considered necessary.
2975	Tele Lands Improvement Ltd		The City of London have prepared a list of SAMMs measures (as identified Natural England 's letter dated 6 March 2019) and it is reasonable that these should be included within any Infrastructure Plan, SPD or CIL Schedule to inform the Draft WFLP. Furthermore, any requirement to deliver mitigation should be identified in a Local Plan policy, rather than preamble, so that it is given weight in decision making and it is clear to developers that they are required to either propose mitigation or contribute to off-site mitigation. Most of Waltham Forest falls within the 0-3km Zol. When aligning this with the spatial strategy identified within the Draft WFLP, it appears that the majority of strategic locations for growth in Waltham Forest all fall within the 0-3km Zol and therefore all residential development in the Borough is likely to trigger a requirement for avoidance and mitigation measures in accordance with Natural England 's letter dated 6 March 2019, and this should be clearly sign posted in Policy.	It is proposed to review and update the draft Local Plan to incorporate new evidence since the plan was published. It will include the findings of the HRA currently being undertaken.

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Chapter 17: Protecting and Enhancing the Environment				
ID	Full Name	Organisation	Comment	Council (Officers) Response
2976	Tele Lands Improvement Ltd		It is unclear at present how much development would trigger the requirement for SANGs (over 100 units, as per Natural England 's letter dated 6 March 2019) as only broad locations for development are identified within the Draft WFLP but on a worst case basis, given that the majority of development falls within the Zol, the development of 27,000 additional homes would require approximately 518.4ha of SANGs ¹ The Inspector for Epping Forest SVLP is very clear that SANGs needs to be allocated in the Local Plan. Whilst Figure 17.3 of the Draft WFLP identifies the protected green spaces in the Borough, there is nowhere in the Draft WFLP that identifies whether SANG can be accommodated in the Borough or whether existing open spaces can be upgraded to function as SANG.	It is proposed to review and update the draft Local Plan to incorporate new evidence since the plan was published. It will include the findings of the HRA currently being undertaken.
2977	Tele Lands Improvement Ltd		Appendix 2 notes that a Green Infrastructure Strategy is being prepared but this is not yet available. We note that in 2017 Walthamstow Wetlands was opened which provides public access to a large previously inaccessible area, and it may be possible for this area to function as a SANG, particularly for new development in the west of the Borough. A Green Infrastructure Strategy must be used to inform the mitigation required to alleviate recreation pressure on Epping Forest SAC (a SANG strategy) and should be referenced in Policy in the WFLP and allocated in the Local Plan. Based on an average of 2.4 persons per household, 27,000 homes equal 64,800 additional residents. Natural England require SANGs to be provided at a rate of 8ha per 1,000 residents and this equates to 518.4ha of total SANG required.	This point is noted. It is proposed to review and update the draft Local Plan to incorporate new information since the plan was published. This will include the findings of the HRA currently being undertaken and necessary mitigation measures such as SANGs being considered.
2978	Tele Lands Improvement Ltd		Lands Improvement consider that additional work is likely required to understand and deliver the appropriate mitigation for Epping Forest SAC and until such time as this work is completed, it raises questions as to whether the Draft WFLP can conclude no likely significant effects as part of any Habitat Regulations Assessment.	This point is noted. Work is in progress regarding the Habitat Regulations Assessment. This will be published on Waltham Forest Council's website when ready and will inform the next iteration of the Plan - the Proposed Submission version.

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Chapter 17: Protecting and Enhancing the Environment				
ID	Full Name	Organisation	Comment	Council (Officers) Response
2979	Tele Lands Improvement Ltd		It is also recommended that the policies in the Draft WFLP are updated to more strongly consider the implications of development on Epping Forest SAC and to identify that the majority of development in the Borough is likely to fall within the ZoI for Epping Forest SAC. Mitigation in the form of SAMMs, SANGs or identified improvements to existing Green Infrastructure needs to be identified via a policy within the Local Plan and the evidence base/obligations documentation (SPD, Infrastructure Delivery Plan or CIL Schedule) need to be updated to reflect any proposed mitigation needed to support the Local Plan growth strategy. As identified by the Inspector for the Epping Forest SVLP, any SANG provision needs to be allocated within the Local Plan itself. Given the scale of growth identified around Epping Forest SAC (in Waltham Forest, Redbridge and Epping Forest), it may require joint thinking with respect to mitigation and access management measures and we would encourage any approach which enables cross boundary connection of green infrastructure.	This point is noted. Work is in progress regarding the Habitat Regulations Assessment. This will be published on Waltham Forest Council's website when ready and will inform the next iteration of the Plan - the Proposed Submission version.

Policy 84: Green Infrastructure and the Natural Environment				
ID	Full Name	Organisation	Comment	Council (Officers) Response
332	ms Louise Krzan		Policy 85 - Protecting Green Belt and Metropolitan Open Land (MOL) - either you are protecting them or you are not. The way this gives caveats to situations where they could be developed is not OK. And if you insist on doing it this way then you should also include red lines of what isn't OK.	Comment noted for consideration.
793	LVRPA	Lee Valley Regional Park Authority	Policy 84 'Green Infrastructure and the Environment' also promotes the need to ensure proposals improve the connectivity and accessibility of the Borough's green and blue infrastructure including the Green Belt and MOL. Given the	Noted. The Plan seeks to improve and enhance access and permeability to the Green Belt and MOL in the Borough.

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Policy 84: Green Infrastructure and the Natural Environment				
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			substantial area of the Park within the Borough and the range of landscapes and leisure experiences it provides this emphasis on accessibility is important.	
794	Ms Tessa Craig		We note that that borough has declared a climate emergency, However, the environmental policies are not set out until later in the plan and they are not referred to in the five golden threads. It would be useful for chapters on Housing, Growth and Economy to cross reference the policies on reducing effects on climate change, wellbeing, health and active travel so that its embedded and intrinsic to every policy highlighted as a driving force within the Borough's Plan.	Noted. Include reference to the Climate Emergency Declaration in the Five Golden Threads - additional wording around Golden Thread 2.
798	LVRPA	Lee Valley Regional Park Authority	It is positive that the diverse nature of the Green Belt and MOL within the Borough has been recognised in the draft Local Plan. As the Park boundary includes parts of Lea Bridge Road and the fringe of the North Circular there are sites within the Regional Park that could potentially be released from Green Belt and MOL in the future.	Noted. Support welcomed.
799	LVRPA	Lee Valley Regional Park Authority	The outcome of the Council's Green Belt review is critical in respect of the sites identified by the Authority through the Call for Sites process which identified sites on Lea Bridge Road. Accordingly, if exceptional circumstances exist in these areas and are confirmed by the Council's Green Belt Review, paras 136 to 138 of the NPPF (Feb 2019) sets out the circumstances in which the boundaries of these parcels may be adjusted or the land developed. It is understood that further work is in hand to review Green Belt/MOL land and the Authority would wish to be involved in the next stages of this process.	Noted. The Council MOL and MOL study and the review is on the council's website. LBWF will consult LVPA on the next stages of this process.
856	Ms Tessa Craig		We welcome the objective to support proposals that preserve and enhance green and blue infrastructure and access to open spaces by improving active access for pedestrians and cyclists where appropriate, that "enhance the green infrastructure, network through better connectivity and the creation of new	Noted. Support welcomed. We will review this comment and publish any changes arising in the next iteration of the Local Plan, which is due to be published for consultation in Autumn 2020.

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			open spaces whilst also conserving their natural and historic value. We feel this would reinforce the point if this policy was referenced in policy 68 Walking and Cycling as well.	
869	Alice Roberts	Campaign to Protect Rural England (CPRE)	We are concerned that the Green Belt review is looking at protected areas of 'brownfield' or industrial land. Having ourselves reviewed Green Belt and MOL sites along the North Circular and at Lea Bridge we cannot see that there are any which are not vitally important in terms of the five NPPF criteria and London Plan policy.	Noted. The Council will review this position in the next publication of the Local Plan.
870	Alice Roberts	Campaign to Protect Rural England (CPRE)	The criteria against which any Green Belt or MOL sites should be judged, brownfield or not, are clearly set out in the London Plan and the NPPF and these should be followed closely and should entail an objectives assessment of their contribution, inter alia, to openness and permanence, and their current or potential as sites for sports or recreation, food growing and eco-system management i.e. flood management / air quality and temperature management. Any assessment should consider what impact the loss of these sites would have on the future ability of the borough, neighbouring boroughs and London as a whole to manage all of these.	Noted. The Council will review this position in the next publication of the Local Plan.
871	Alice Roberts	Campaign to Protect Rural England (CPRE)	We would be very concerned if the sites at Lea Bridge referred to were the Thames water Depot or the Waterworks Centre both of which are important parts of the Lea Valley Regional Park and very clearly important as MOL, central as they are to surrounding MOL. We would strongly object to either of these sites being put forward for development.	The Council is preparing an additional Local Plan document on site-specific allocations. This will provide opportunity to apply the policies of the plan on specific sites, providing more details on how new developments could be integrated within local areas.
874	Alice Roberts	Campaign to Protect Rural England (CPRE)	In the case of the Thames Water Depot, it should be noted that an area of hardstanding such as this does not constitute a 'brownfield' site. It is simply an area of hardstanding within what is in fact a park as well as open land, albeit with no current public access.	The Council is preparing an additional Local Plan document on site-specific allocations. This will provide opportunity to apply the policies of the plan on specific sites, providing more details on how new developments could be integrated within local areas.

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876	Alice Roberts	Campaign to Protect Rural England (CPRE)	(p171) 17.6 Chapter 13 indicates that sites in "Lea Bridge and on the fringe of the North Circular". The Lea Bridge Waterworks (currently Thames Water Depot) should categorically not be considered for development as it is a critical part of the wider area of Metropolitan Open Land and the Lea Valley Regional Park and any development outside of the existing footprint would seriously impact on its permanence and openness. As the site is MOL all efforts should be made, as per London Plan and NPPF policy, to create public access and improve and enhance the site for London's people and environment. It should be protected from development and opened up to public access, re-imagined as a place for wild swimming and community horticulture, with the vital habitat along the river designated as a nature reserve and connected to the neighbouring Middlesex Filter Beds Nature Reserve. Other parts of the site can be left to 're-wild'. In bringing this site into public access consideration should be given to how the Waterworks Centre can be incorporated into plans to make the best use of all assets for public benefit and to protect and enhance the wider area of MOL as well as both of these sites. The Waterworks Centre is not appropriate for development and should not be considered for development. The site is part of the Lea Valley Regional Park and was given permission for development to improve access to the park and not to pave the way for more incremental development on the site.	The plan seeks to protect Green Belt/MOL areas. The Council is preparing an additional Local Plan document on site specific allocations. This will provide opportunity to apply the policies of the plan on specific sites, providing more details on how new developments could be integrated within local areas.
877	Alice Roberts	Campaign to Protect Rural England (CPRE)	This site does not appear to be protected However, is a flood plain and adjacent to important Metropolitan Open Land / park land and SINCS and therefore, if it to be developed, should be developed sensitively to ensure no impact on the openness and permanence of those sites, nor on their valuable habitats. The opportunity should be taken to bring the southern part of the site currently occupied by a gas ring into the park so that the	The Local Plan does not allocate any site in the MOL or the Green Belt for redevelopment. The Council is preparing an additional Local Plan document on site specific allocations. This will provide opportunity to apply the policies of the plan on specific sites, providing more details on how new developments could be integrated within existing local areas. The Council will be consulting on a Site Allocations Development Plan Document later in 2020.

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			park is a more coherent space and so that the development does not impact on the park.	
938	Mr Mathew Frith		We support this in principle, although we recommend it should be strengthened and refer to its intrinsic value for supporting biodiversity as well as benefits for people; along the lines of "Protect, restore and enhance the Borough's natural environment to sustain habitats and species of conservation importance, and develop a multi-functional network of green and blue infrastructure to deliver benefits for all, including, where appropriate, increased public access." Protecting London's wildlife for the future The London Wildlife Trust is a company limited by guarantee registered in England and Wales no. 1600379 and registered charity no. 283895. Para 17.1: We would like to see specific reference that the Lee Valley and Epping Forest are also of regional, national and international importance for biodiversity, and that the borough (along with key partners) have a responsibility to ensure that these ecological assets are properly protected through appropriate policies (as set out in NPPF para 170, 176).	Noted. We will review this amendment and consider it for addition for the next consultation on the Local Plan.
939	Mr Mathew Frith		Para 17.5; The infographic could be enhanced by including the number of Sites of Importance for Nature Conservation (27) and the area of internationally important sites (Lee Valley SPA/Ramsar and Epping Forest SAC) within the borough.	Noted. This will be considered for inclusion in the next publication of the Local Plan.
940	Mr Mathew Frith		We welcome and support this.	Noted. Support welcomed.
941	Mr Mathew Frith		Para 17.7: We welcome and support this.	Noted. Support welcomed.

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942	Mr Mathew Frith		Para 17.8: We welcome and support this.	Noted. Support welcomed.
997	The City of London	The Conservator's of Epping Forest	The City Corporation would encourage a more progressive approach to green infrastructure stewardship focusing on a Restoration Prioritisation Framework that would guide investment from development towards key Borough priorities, rather than funding local and possibly low-priority schemes.	Noted. The Council will consider this approach to green infrastructure stewardship and publish any update in the next version of the Local Plan.
1099	Milena Petrovic	Sustainable Development Officer Thames Team Natural England	Natural England recently made preliminary comments on the development of an Open Space Strategy and a Green Infrastructure Strategy for LBWF. We are supportive of the creation of these documents, and the opportunities they provide for positive outcomes for the natural environment. The strategies would ideally cover maintaining and enhancing existing open space; creating new open space; and creating and maintaining a network of green infrastructure. The principles of these documents should be embedded in the Local Plan.	Noted. Support welcomed.
1276	Adam McAlavey		The Lea Bridge Waterworks (currently Thames Water Depot) should categorically not be considered for development as it is a critical part of the wider area of Metropolitan Open Land and the Lea Valley Regional Park and any development outside of the existing footprint would seriously impact on its permanence and openness. This site should be protected from development and opened up to public access, re-imagined as a place for wild swimming and community horticulture, with the vital habitat along the river designated as a nature reserve and connected to the neighbouring Middlesex Filter Beds Nature Reserve and other parts of the site left to 're-wild'. The existing concrete slab could easily be removed in some areas and to reveal the buried filter beds below A swimming / pond area should be created from a section of the old filter bed, re-imagined as a place for wild swimming. The site should be re-wilded, allowing	No allocations are made as part of the draft Local Plan, which is supported by a Green Belt and Metropolitan Open Land Study (2015-2019). The proposals to re-wild the area are noted. The council is committed to maintaining the sensitive balance between the need for development and the protection of Green Belt and MOL.

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			<p>nature to reclaim the built environment naturally in some places and replanting and landscaping in others. The site should be a space for people to learn how to live harmoniously with nature, perhaps through small-scale good growing or sustainable foraging or a social enterprise or community garden centre like Growing Concerns in Tower Hamlets or Living Under One Sun sites in Haringey. It should be a place to showcase the area's industrial heritage by retaining and enhancing the site's historic buildings. It is a valuable part of the green lung, linking the Middlesex Filter Beds and the Essex Filter Beds and should be reconnected to the surrounding sites. Retaining an area of public hard landscaping would complement the surrounding area. This area is on my doorstep and I use it every day. It is a vital space for me and I strongly believe it should be kept open for the public and never used for private development. The area is vital for mine and many others wellbeing and mental health. As well as an amazing space to enjoy nature this is a place of historical importance and should be preserved and kept open and free for all to enjoy. I live just off Lee Bridge Road and am very concerned with the huge amount of traffic congestion. The road is at a standstill every day including weekends and using this space for private development will only add to this issue. We need urgent plans to lessen the traffic and pollution issues in this area.</p>	
1283	Dr Bona Muzaka		<p>The Lea Bridge Waterworks (currently Thames Water Depot) should categorically not be considered for development as it is a critical part of the wider area of Metropolitan Open Land and the Lea Valley Regional Park and any development outside of the existing footprint would seriously impact on its permanence and openness. This site should be protected from development and opened up to public access, re-imagined as a place for wild swimming and community horticulture, with the vital habitat along the river designated as a nature reserve and connected to</p>	<p>No allocations are made as part of the Local Plan which is supported by a Green Belt and Metropolitan Open Land Study (2015-2019). The proposals to re-wild the area are noted. The Council is committed to maintaining the sensitive balance between the need for development and the protection of Green Belt and MOL.</p>

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			<p>the neighbouring Middlesex Filter Beds Nature Reserve and other parts of the site left to 're-wild'. The existing concrete slab could easily be removed in some areas and to reveal the buried filter beds below A swimming / pond area should be created from a section of the old filter bed, reimagined as a place for wild swimming. The site should be re-wilded, allowing nature to reclaim the built environment naturally in some places and replanting and landscaping in others. The site should be a space for people to learn how to live harmoniously with nature, perhaps through small-scale good growing or sustainable foraging or a social enterprise or community garden centre like Growing Concerns in Tower Hamlets or Living Under One Sun sites in Haringey. It should be a place to showcase the area's industrial heritage by retaining and enhancing the site's historic buildings. It is a valuable part of the green lung, linking the Middlesex Filter Beds and the Essex Filter Beds and should be reconnected to the surrounding sites. Retaining an area of public hard landscaping would complement the surrounding area. This area is on my doorstep and I use it every day. It is a vital space for me and I strongly believe it should be kept open for the public and never used for private development. The area is vital for mine and many others wellbeing and mental health. As well as an amazing space to enjoy nature this is a place of historical importance and should be preserved and kept open and free for all to enjoy. I live just off Lee Bridge Road and am very concerned with the huge amount of traffic congestion. The road is at a standstill every day including weekends and using this space for private development will only add to this issue. We need urgent plans to lessen the traffic and pollution issues in this area.</p>	

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ID	Full Name	Organisation	Comment	Council (Officers) Response
1308	Caroline Day		<p>I used to live close to Lea Bridge, in Clapton and frequented the area of Lea Bridge everyday. I now live in the borough of Broxbourne, at the other end of the Lee Valley and regularly visit the Lower Lee Valley, including the Lea Bridge area. I am responding to this consultation because it is important not just to preserve the Lee Valley Park and marshes as a green lung for London but beyond, enhancing green spaces and extending into contiguous areas, connecting up the marshes and vital natural habitats. With this in mind, the Lea Bridge Waterworks (currently Thames Water Depot) should categorically not be considered for development as it is a critical part of the wider area of Metropolitan Open Land and the Lea Valley Regional Park and any development outside of the existing footprint would seriously impact on its permanence and openness. I support the local community demand that the site should be protected from development and opened up to public access, re-imagined as a place for wild swimming and community horticulture, with the vital habitat along the river designated as a nature reserve and connected to the neighbouring Middlesex Filter Beds Nature Reserve and other parts of the site left to 're-wild'. The existing concrete slab could easily be removed in some areas and to reveal the buried filter beds below. A swimming / pond area should be created from a section of the old filter bed, re-imagined as a place for wild swimming. The site should be re-wilded, allowing nature to reclaim the built environment naturally in some places and replanting and landscaping in others. The site should be a space for people to learn how to live harmoniously with nature, perhaps through small-scale good growing or sustainable foraging or a social enterprise or community garden centre like Organic Lea, Growing Communities nursery on Hackney Marshes, Growing Concerns in Tower Hamlets or the Living Under One Sun sites in Haringey It should be a place to showcase the area's industrial</p>	<p>No allocations are made as part of the Local Plan which is supported by a Green Belt and Metropolitan Open Land Study (2015-2019). The proposals to re-wild the area are noted. The council is committed to maintaining the sensitive balance between the need for development and the protection of Green Belt and MOL.</p>

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			heritage by retaining and enhancing the site's historic buildings as has been done so successfully at Walthamstow Wetlands. In an era of potentially devastating climate change, with national and local councils declaring a climate emergency, the utmost should be done to protect floodplains, plant sustainably, protect and extend natural habitats as well as preserve open spaces.	
1309	Celia Coram		Whilst broadly supportive of what I've read of the plan, I would like to emphasize the need to adhere to the planning laws on any building on MOL land such as the Lea Bridge Waterworks (currently known as the Thames Water Depot. This land is between two nature reserves and would lend itself to be protected from development and opened up for public access and community use. Save Lea Marshes and CPRE London, recently held a meeting regarding the Thames Water Depot to come up with ideas following Waltham Forest Borough turning down school applications. Ideas included a wild swimming area, community horticulture and ideas to preserve the current buildings for heritage use. This would fit really well with the aims of the Borough Plan with regard to its policies including policy 84 and 87 as well as helping to offset the very real threats of Climate Change and flooding.	Noted support welcomed. No allocations are made as part of the Local Plan, which is supported by a Green Belt and Metropolitan Open Land Study (2015-2019). The proposals to re-wild the area are noted. The council is committed to maintaining the sensitive balance between the need for development and the protection of Green Belt and MOL.
1375	Jennefer Peters	Senior Strategic Planner, London Plan Team Greater London Authority	The draft new London Plan plans for growth within the limits of London's Green Belt and without any loss of London's Metropolitan Open Land (MOL). The Mayor's position on the strong protection of the capital's Green Belt and MOL is reflected in draft new London Plan Policies G2 and G3 and as such, part A of draft Policy 84 is supported.	Noted. Support Welcomed.
1377	Jennefer Peters	Senior Strategic Planner,	It is understood that WF are in the process of conducting a Green Belt review and this should apply the Green Belt tests set out in the National Planning Policy Framework (NPPF) and take	Noted. This is a matter for consideration.

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		London Plan Team Greater London Authority	account of Policy G3 and the benefits set out in Paragraph 8.2.1 of the draft new London Plan.	
1378	Jennefer Peters	Senior Strategic Planner, London Plan Team Greater London Authority	The WF current proposals map is not clear, which makes it difficult to determine precise designation boundaries for Green Belt and MOL. In addition, some areas designated as Green Belt/MOL appear to be fully developed, and where this development is lawful, may no longer meet the national Green Belt tests. The borough's Green Belt Review presents opportunities for WF to reconsider the configuration of its green spaces, especially along the northern and eastern edges of the borough, where parcels should be considered for designation as Green Belt or MOL where the national Green Belt tests are satisfied. Any intentions to alter the Green Belt boundary should be set out clearly as part of WF's Local Plan site allocations. To make the Mayor's position clear, there is an important difference between the intention to clarify land uses through this process so that there is regulation of what is lawfully, currently in existence and the intention to release land from the Green Belt to purely accommodate development. While the former, may in some very limited circumstances be acceptable the latter will not. If WF, through the Local Plan process, do intend to reconfigure the borough's Green Belt boundary a further round of consultation should be considered to ensure that such plans are given adequate opportunity for public scrutiny.	Noted. The maps are being re-drawn with improved definition and legibility for the next publication of the Plan. The Council will consider the comment about Green Belt and MOL release and any update in position will be published in the next version of the plan. The Council is committed to protecting its Green Belt although there are some instances where de-designation of poorly performing Green Belt sites may be necessary.
1379	Jennefer Peters	Senior Strategic Planner, London Plan Team Greater	Draft Local Plan Policy 84B, incorrectly sets out criteria for the determination of planning applications where exceptional circumstances exist for the release of Green Belt Land or MOL. Very special circumstances must be established to justify development proposals within the Green Belt and not	Noted. We will amend the policy wording to consider "very special" circumstances.

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		London Authority	exceptional circumstances which must be established to justify changes to Green Belt boundaries. The confusion between the two terms should be amended accordingly and the correction made.	
1396	Jennefer Peters	Senior Strategic Planner, London Plan Team Greater London Authority	We note at Paragraph 17.7 that WF will be requiring development proposals to deliver an Urban Greening Factor of 3 which is a typo and should be amended accordingly to bring it in line with draft new London Plan Policy G5.	Noted. Amend in line with Draft London Plan Policy G5, which states: "a target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development."
1415	Councillor Ian Rathbone	Councillor London Borough of Hackney	I am writing on behalf of myself and my two colleagues as Lea Bridge (Hackney) ward councillors. Our residents take a keen interest in this site as many of them can see it from their homes, or from Millfields Park. The Lea Bridge Waterworks (currently Thames Water Depot) should categorically not be considered for development as it is a critical part of the wider area of Metropolitan Open Land and the Lea Valley Regional Park and any development outside of the existing footprint would seriously impact on its permanence and openness. This site should be protected from development and opened up to public access, re-imagined as a place for wild swimming and community horticulture, with the vital habitat along the river designated as a nature reserve and connected to the neighbouring Middlesex Filter Beds Nature Reserve and other parts of the site left to 're-wild'. The existing concrete slab could easily be removed in some areas and to reveal the buried filter beds below. A swimming / pond area should be created from a section of the old filter bed, reimagined as a place for wild swimming. The site should be re-wilded, allowing nature to reclaim the built environment naturally in some places and replanting and landscaping in others. The site should be a space	No allocations are made as part of the Local Plan, which is supported by a Green Belt and Metropolitan Open Land Study (2015-2019). The proposals to re-wild the area are noted. The council is committed to maintaining the sensitive balance between the need for development and the protection of Green Belt and MOL.

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			for people to learn how to live harmoniously with nature, perhaps through small-scale good growing or sustainable foraging or a social enterprise or community garden centre like Growing Concerns in Tower Hamlets or Living Under One Sun sites in Haringey. It should be a place to showcase the area's industrial heritage by retaining and site's historic buildings. It is a valuable part of the green lung, linking the Middlesex Filter Beds and the Essex Filter Beds and should be reconnected to the surrounding sites. Retaining an area of public hard landscaping would complement the surrounding area.	
1466	Louise Brierley		I object very strongly to the redevelopment of Lea Bridge Waterworks. I cannot believe that you want to take another slice of this beautiful green space for development. For many like myself it helps to make a city like London bearable.	Noted. Site allocations are part of a separate Local Plan project that will be consulted on separately in the Autumn 2020.
1472	Katherine Schwarz		The Lea Bridge Waterworks (currently Thames Water Depot) should categorically not be considered for development as it is a critical part of the wider area of Metropolitan Open Land and the Lea Valley Regional Park and any development outside of the existing footprint would seriously impact on its permanence and openness. This site should be protected from development and opened up to public access, re-imagined as a place for wild swimming and community horticulture, with the vital habitat along the river designated as a nature reserve and connected to the neighbouring Middlesex Filter Beds Nature Reserve and other parts of the site left to 're-wild'. The existing concrete slab could easily be removed in some areas and to reveal the buried filter beds below. A swimming / pond area should be created from a section of the old filter bed, reimagined as a place for wild swimming. The site should be re-wilded, allowing nature to reclaim the built environment naturally in some places and replanting and landscaping in others. The site should be a space for people to learn how to live harmoniously with	No allocations are made as part of the Local Plan, which is supported by a Green Belt and Metropolitan Open Land Study (2015-2019). The proposals to re-wild the area are noted. The council is committed to maintaining the sensitive balance between the need for development and the protection of Green Belt and MOL.

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1474	Kirsty Badenoch		I am writing to express my objection to the development of the Lea Bridge Waterworks site, both under the terms of its importance as a potential strategic and rare extension of the greenbelt, and as a future community resource as parkland. Within our time of climate emergency, the people and government of London need to urgently reconsider their 'old fashioned' approach to development of such sites. This is not a luxury, it is both a necessity and a responsibility. The Lea Bridge Waterworks site needs to be recognised for its qualitative value, and it's potential to aid both local and wider communities through establishment as a park, not a building. The Lea Bridge Waterworks (currently Thames Water Depot) should categorically not be considered for development as it is a critical part of the wider area of Metropolitan Open Land and the Lea Valley Regional Park and any development outside of the existing footprint would seriously impact on its permanence and openness. This site should be protected from development and opened up to public access, re-imagined as a place for wild swimming and community horticulture, with the vital habitat along the river designated as a nature reserve and connected to the neighbouring Middlesex Filter Beds Nature Reserve and other parts of the site left to 're-wild'. The existing concrete	No allocations are made as part of the Local Plan, which is supported by a Green Belt and Metropolitan Open Land Study (2015-2019). The proposals to re-wild the area are noted. The council is committed to maintaining the sensitive balance between the need for development and the protection of Green Belt and MOL.

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1475	Kate Thomas		The Lea Bridge Waterworks (currently Thames Water Depot) should categorically not be considered for development as it is a critical part of the wider area of Metropolitan Open Land and the Lea Valley Regional Park and any development outside of the existing footprint would seriously impact on its permanence and openness. This site should be protected from development and opened up to public access, re-imagined as a place for wild swimming and community horticulture, with the vital habitat along the river designated as a nature reserve and connected to the neighbouring Middlesex Filter Beds Nature Reserve and other parts of the site left to 're-wild'. The existing concrete slab could easily be removed in some areas and to reveal the buried filter beds below A swimming / pond area should be created from a section of the old filter bed, reimagined as a place for wild swimming The site should be re-wilded, allowing nature to reclaim the built environment	No allocations are made as part of the Local Plan which is supported by a Green Belt and Metropolitan Open Land Study (2015-2019). The proposals to re-wild the area are noted. The council is committed to maintaining the sensitive balance between the need for development and the protection of Green Belt and MOL.

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			naturally in some places and replanting and landscaping in others The site should be a space for people to learn how to live harmoniously with nature, perhaps through small-scale good growing or sustainable foraging or a social enterprise or community garden centre like Growing Concerns in Tower Hamlets or Living Under One Sun sites in Haringey It should be a place to showcase the area's industrial heritage by retaining and site's historic buildings It is a valuable part of the green lung, linking the Middlesex Filter Beds and the Essex Filter Beds and should be reconnected to the surrounding sites. Retaining an area of public hard landscaping would complement the surrounding area.	
1479	Kate Peters		The Lea Bridge Waterworks (currently Thames Water Depot) should categorically not be considered for development as it is a critical part of the wider area of Metropolitan Open Land and the Lea Valley Regional Park and any development outside of the existing footprint would seriously impact on its permanence and openness. This site should be protected from development and opened up to public access, re-imagined as a place for wild swimming and community horticulture, with the vital habitat along the river designated as a nature reserve and connected to the neighbouring Middlesex Filter Beds Nature Reserve and other parts of the site left to 're-wild'. The existing concrete slab could easily be removed in some areas and to reveal the buried filter beds below. A swimming / pond area should be created from a section of the old filter bed, reimagined as a place for wild swimming. The site should be re-wilded, allowing nature to reclaim the built environment naturally in some places and replanting and landscaping in others. The site should be a space for people to learn how to live harmoniously with nature, perhaps through small-scale good growing or sustainable foraging or a social enterprise or community garden centre like Growing Concerns in Tower Hamlets or Living Under	No allocations are made as part of the Local Plan, which is supported by a Green Belt and Metropolitan Open Land Study (2015-2019). The proposals to re-wild the area are noted. The council is committed to maintaining the sensitive balance between the need for development and the protection of Green Belt and MOL.

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			One Sun sites in Haringey Organiclea would be a great organisation to consult in terms of horticulture / learning. It should be a place to showcase the area's industrial heritage by retaining and enhancing the site's historic buildings. It is a valuable part of the green lung, linking the Middlesex Filter Beds and the Essex Filter Beds and should be reconnected to the surrounding sites. Retaining an area of public hard landscaping would complement the surrounding area.	
1480	Julia Drell		<p>The Lea Bridge Waterworks (currently Thames Water Depot) should categorically not be considered for development as it is a critical part of the wider area of Metropolitan Open Land and the Lea Valley Regional Park and any development outside of the existing footprint would seriously impact on its permanence and openness. This site should be protected from development and opened up to public access, re-imagined as a place for wild swimming and community horticulture, with the vital habitat along the river designated as a nature reserve and connected to the neighbouring Middlesex Filter Beds Nature Reserve and other parts of the site left to 're-wild'. The existing concrete slab could easily be removed in some areas and to reveal the buried filter beds below. A swimming / pond area should be created from a section of the old filter bed, reimagined as a place for wild swimming. The site should be re-wilded, allowing nature to reclaim the built environment naturally in some places and replanting and landscaping in others. The site should be a space for people to learn how to live harmoniously with nature, perhaps through small-scale good growing or sustainable foraging or a social enterprise or community garden centre like Growing Concerns in Tower Hamlets or Living Under One Sun sites in Haringey Organiclea would be a great organisation to consult in terms of horticulture / learning. It should be a place to showcase the area's industrial heritage by retaining and enhancing the site's historic buildings. It is a</p>	No allocations are made as part of the Local Plan which is supported by a Green Belt and Metropolitan Open Land Study (2015-2019). The proposals to re-wild the area are noted. The council is committed to maintaining the sensitive balance between the need for development and the protection of Green Belt and MOL.

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			valuable part of the green lung, linking the Middlesex Filter Beds and the Essex Filter Beds and should be reconnected to the surrounding sites. Retaining an area of public hard landscaping would complement the surrounding area.	
1487	Jasmin Dhaliwal		<p>The Lea Bridge Waterworks (currently Thames Water Depot) should categorically not be considered for development as it is a critical part of the wider area of Metropolitan Open Land and the Lea Valley Regional Park and any development outside of the existing footprint would seriously impact on its permanence and openness. This site should be protected from development and opened up to public access, re-imagined as a place for wild swimming and community horticulture, with the vital habitat along the river designated as a nature reserve and connected to the neighbouring Middlesex Filter Beds Nature Reserve and other parts of the site left to 're-wild'. The existing concrete slab could easily be removed in some areas and to reveal the buried filter beds below. A swimming / pond area should be created from a section of the old filter bed, reimagined as a place for wild swimming. The site should be re-wilded, allowing nature to reclaim the built environment naturally in some places and replanting and landscaping in others. The site should be a space for people to learn how to live harmoniously with nature, perhaps through small-scale good growing or sustainable foraging or a social enterprise or community garden centre like Growing Concerns in Tower Hamlets or Living Under One Sun sites in Haringey Organiclea would be a great organisation to consult in terms of horticulture / learning. It should be a place to showcase the area's industrial heritage by retaining and enhancing the site's historic buildings. It is a valuable part of the green lung, linking the Middlesex Filter Beds and the Essex Filter Beds and should be reconnected to the surrounding sites. Retaining an area of public hard landscaping would complement the surrounding area.</p>	<p>No allocations are made as part of the Local Plan which is supported by a Green Belt and Metropolitan Open Land Study (2015-2019). The proposals to re-wild the area are noted. The council is committed to maintaining the sensitive balance between the need for development and the protection of Green Belt and MOL.</p>

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1489	Hedi Jonsdottir		<p>The Lea Bridge Waterworks (currently Thames Water Depot) should categorically not be considered for development as it is a critical part of the wider area of Metropolitan Open Land and the Lea Valley Regional Park and any development outside of the existing footprint would seriously impact on its permanence and openness. This site should be protected from development and opened up to public access, re-imagined as a place for wild swimming and community horticulture, with the vital habitat along the river designated as a nature reserve and connected to the neighbouring Middlesex Filter Beds Nature Reserve and other parts of the site left to 're-wild'. The existing concrete slab could easily be removed in some areas and to reveal the buried filter beds below. A swimming / pond area should be created from a section of the old filter bed, reimagined as a place for wild swimming. The site should be re-wilded, allowing nature to reclaim the built environment naturally in some places and replanting and landscaping in others. The site should be a space for people to learn how to live harmoniously with nature, perhaps through small-scale good growing or sustainable foraging or a social enterprise or community garden centre like Growing Concerns in Tower Hamlets or Living Under One Sun sites in Haringey Organiclea would be a great organisation to consult in terms of horticulture / learning. It should be a place to showcase the area's industrial heritage by retaining and enhancing the site's historic buildings. It is a valuable part of the green lung, linking the Middlesex Filter Beds and the Essex Filter Beds and should be reconnected to the surrounding sites. Retaining an area of public hard landscaping would complement the surrounding area.</p>	<p>No allocations are made as part of the Local Plan which is supported by a Green Belt and Metropolitan Open Land Study (2015-2019). The proposals to re-wild the area are noted. The council is committed to maintaining the sensitive balance between the need for development and the protection of Green Belt and MOL.</p>
1514	Helen Monger	London Parks and Gardens Trust	<p>The new local plan should ensure development sites contribute to the ongoing maintenance of designed landscapes and invest in them to ensure they can withstand greater pressure from the increased population.</p>	<p>Noted. For further discussion regarding Section 106 funding.</p>

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1518	Helen Monger	London Parks and Gardens Trust	Support Policy 84 in particular D, E & F.	Noted. Support welcomed.
1557	Mark Furnish	Sport England	Although Sport England welcomes Policy 85's protective stance, as sport and physical activity is often undertaken in such areas, it is concerned that the function of the open space, green infrastructure, Green Belt, Metropolitan Open Land is not protected. As a result, the policy could potentially allow playing pitches to be replaced with planting beds and other forms of landscaping that could potentially erode a sites use as a playing field and could, in the long-term, result in the playing field being lost. Sport England object to this stance until the function of open space is protected by the policy. That said, Policy 86 could be interpreted to protect the function of land but Sport England would seek confirmation from the Council how it anticipates policy 86 could be interpreted.	Noted. Support welcomed. The council has conducted a Sports Facility and Playing Pitch Strategy, which was published in December 2019. The findings of these two documents will be worked into the next draft of the Local Plan.
1711	Carol Resteghini		I believe specific consideration should be made of the environmental and situational significance of The Highams Park.	Noted. This comes under Epping Forest Special Area of Conservation which is referenced in the Plan.
1839	Peter Mudge		My main concern is with Paragraph 17.6, which envisages the de-designation of MOL. Development on any of the current MOL in the vicinity of Lea Bridge Road should not be permitted under any circumstances. There is already a great threat of the Lea Valley Regional Park being cut in two by developments such as Essex Wharf, the Ice Centre and the Riding Centre (quite apart from the Lea Bridge Road itself). So any further development in this area must be resisted, in particular the Thames Water Depot and the Waterworks Centre.	Noted. The Council is in the process of reviewing the Green Belt and MOL Strategy. Any recommendations arising from this on the de-designation of such sites will be included in the next draft of the Local Plan.
1844	Peter Mudge		My main concern is with Paragraph 17.6, which envisages the de-designation of MOL. Development on any of the current MOL in the vicinity of Lea Bridge Road should not be permitted under any circumstances. There is already a great threat of the	This point is noted. It is proposed to review Paragraph 17.6 for better clarity and interpretation.

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			Lea Valley Regional Park being cut in two by developments such as Essex Wharf, the Ice Centre and the Riding Centre (quite apart from the Lea Bridge Road itself). So any further development in this area must be resisted, in particular the Thames Water Depot and the Waterworks Centre.	
1860	Tom Hartney		I would like to state my support for the Save Lea Marsh campaign for the Lea Bridge Waterworks site to be protected from development and opened up for wild swimming and community gardening. As the opening of the Walthamstow Wetlands has shown, there is high public demand for accessible areas of nature in east London, and while there is a need for new housing, riverside sites like this are valuable and should be preserved for both London wildlife and future generations. In addition new housing requires a balance of new leisure and heritage facilities for a high quality of life and public health to be maintained	Noted. Site allocations are part of a separate project that will be consulted on separately in 2020.
1881	Mike Chrimes		more work needs to be done on the greenways-the existing map is inaccurate, and it should include reference to all public rights of way and cycle routes in a separate map. A policy should be to provide greenway routes north south and east west at regular intervals across the borough, working with other authorities to develop a London network 12.4 could be strengthened with a map to show potential routes	Noted. We will review, consider and update the maps and publish any amendments necessary in the next draft of the Local Plan.
2034	Ian White		The Lea Bridge Waterworks (currently Thames Water Depot) should categorically not be considered for development as it is a critical part of the wider area of Metropolitan Open Land and the Lea Valley Regional Park and any development outside of the existing footprint would seriously impact on its permanence and openness. This site should be protected from development and opened up to public access, re-imagined as a place for wild swimming and community horticulture, with the vital habitat along the river designated as a nature reserve and connected to	No allocations are made as part of the Local Plan, which is supported by a Green Belt and Metropolitan Open Land Study (2015-2019). The proposals to re-wild the area are noted. The council is committed to maintaining the sensitive balance between the need for development and the protection of Green Belt and MOL.

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			<p>the neighbouring Middlesex Filter Beds Nature Reserve and other parts of the site left to 're-wild'. The existing concrete slab could easily be removed in some areas and to reveal the buried filter beds below. A swimming / pond area should be created from a section of the old filter bed, reimagined as a place for wild swimming. The site should be re-wilded, allowing nature to reclaim the built environment naturally in some places and replanting and landscaping in others. The site should be a space for people to learn how to live harmoniously with nature, perhaps through small-scale good growing or sustainable foraging or a social enterprise or community garden centre like Growing Concerns in Tower Hamlets or Living Under One Sun sites in Haringey Organiclea would be a great organisation to consult in terms of horticulture / learning. It should be a place to showcase the area's industrial heritage by retaining and enhancing the site's historic buildings. It is a valuable part of the green lung, linking the Middlesex Filter Beds and the Essex Filter Beds and should be reconnected to the surrounding sites. Retaining an area of public hard landscaping would complement the surrounding area. My wife and I live on the banks of the Lee and the Lee Valley is so important to us. We walk there every day and so does my elderly mother-in-law who has dementia. The area is a lifeline for us. Please protect it for now and the future.</p>	
2038	Francesca Duncan		<p>The Lea Bridge Waterworks (currently Thames Water Depot) should categorically not be considered for development as it is a critical part of the wider area of Metropolitan Open Land and the Lea Valley Regional Park and any development outside of the existing footprint would seriously impact on its permanence and openness. This site should be protected from development and opened up to public access, re-imagined as a place for wild swimming and community horticulture, with the vital habitat along the river designated as a nature reserve and connected to</p>	<p>No allocations are made as part of the Local Plan, which is supported by a Green Belt and Metropolitan Open Land Study (2015-2019). The proposals to re-wild the area are noted. The council is committed to maintaining the sensitive balance between the need for development and the protection of Green Belt and MOL.</p>

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			<p>the neighbouring Middlesex Filter Beds Nature Reserve and other parts of the site left to 're-wild'. The existing concrete slab could easily be removed in some areas and to reveal the buried filter beds below. A swimming / pond area should be created from a section of the old filter bed, reimagined as a place for wild swimming. The site should be re-wilded, allowing nature to reclaim the built environment naturally in some places and replanting and landscaping in others. The site should be a space for people to learn how to live harmoniously with nature, perhaps through small-scale good growing or sustainable foraging or a social enterprise or community garden centre like Growing Concerns in Tower Hamlets or Living Under One Sun sites in Haringey Organiclea would be a great organisation to consult in terms of horticulture / learning. It should be a place to showcase the area's industrial heritage by retaining and enhancing the site's historic buildings. It is a valuable part of the green lung, linking the Middlesex Filter Beds and the Essex Filter Beds and should be reconnected to the surrounding sites. Retaining an area of public hard landscaping would complement the surrounding area. I live nearby, have an allotment nearby and spend my commute cycling up the River Lea. This is a special place in the East of London and I implore you to consider a long term sustainable and environmentally positive rewilding of this site for future generations. As cities become increasingly more developed and polluted we need to actively encourage these green spaces.</p>	
2058	Stonecrest Marble Ltd Stonecrest Marble Ltd	Stonecrest Marble Ltd	<p>With regards criterion (d), we support the intention to protect designated sites and areas. However, the Council's evidence base in relation to Green Belts acknowledges that there are specific sites which perform very poorly against the NPPFs Green Belt purposes (NPPF para. 134), including our client's site.</p>	<p>Noted. Site allocations and site-specific representations are part of a separate Local Plan project that will be consulted on separately in Autumn 2020.</p>

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2081	Mike Sparrow		You also believe housing will make, your words 'better use of the green spaces in the area' and you believe people will use their cars less because you are going to open up a public and cycle route along the river Lea. How on earth can you state and with respect how dare you imply or state that a better use of green spaces is housing. We need all the green spaces we can in London. Building on them does not improve them in anyone's eyes. That is factually wrong.	Noted. The Council is currently in the process of reviewing and updating its Green Belt, and Metropolitan Open Land and Green Space Studies. This will inform the next publication of the Local Plan which will go out for consultation in Summer / Autumn 2020. It is Waltham Forest Council's intention to retain green space due to its high amenity value, although there may be some release in very exceptional circumstances.
2225	Lucy Read	Planning Advisor, Sustainable Places Environment Agency	Generally supportive of this policy. Policy point B An additional point should be added to ensure development maximises opportunities for urban greening through appropriate landscaping schemes and planting of trees. Point C - Should be amended to included detail of how development will quantify ecological impacts to ensure enhancement plans can be measured. Point iii does not include key examples of how biodiversity value could be increased.	Noted. Support welcomed. We will review the points on A - maximising opportunities for urban greening; and C - details of how development will quantify ecological impacts to ensure enhancement plans can be measured. We will also investigate Point iii on how biodiversity values can be increased.
2445	Dorothea Gorman		The Lea Bridge Waterworks (currently Thames Water Depot) should categorically not be considered for development as it is a critical part of the wider area of Metropolitan Open Land and the Lea Valley Regional Park and any development outside of the existing footprint would seriously impact on its permanence and openness. This site should be protected from development and opened up to public access, re-imagined as a place for wild swimming and community horticulture, with the vital habitat along the river designated as a nature reserve and connected to the neighbouring Middlesex Filter Beds Nature Reserve and other parts of the site left to 're-wild'. The existing concrete slab could easily be removed in some areas and to reveal the buried filter beds below A swimming / pond area should be created from a section of the old filter bed, reimagined as a place for wild swimming The site should be re-wilded, allowing nature to reclaim the built environment naturally in some	No allocations are made as part of the Local Plan, which is supported by a Green Belt and Metropolitan Open Land Study (2015-2019). The proposals to re-wild the area are noted. The Council is committed to maintaining the sensitive balance between the need for development and the protection of Green Belt and MOL.

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2446	Dee O'Connell		I believe that the Lea Bridge Waterworks (currently Thames Water Depot) should absolutely not be considered for development as it is a critical part of the wider area of Metropolitan Open Land and the Lea Valley Regional Park and any development outside of the existing footprint would seriously impact on its permanence and openness. This site should be protected from development and opened up to public access, re-imagined as a place for wild swimming and community horticulture, with the vital habitat along the river designated as a nature reserve and connected to the neighbouring Middlesex Filter Beds Nature Reserve and other parts of the site left to 're-wild'. The existing concrete slab could easily be removed in some areas and to reveal the buried filter beds below A swimming / pond area should be created from a section of the old filter bed, reimagined as a place for wild swimming The site should be re-wilded, allowing nature to reclaim the built environment naturally in some places and replanting and landscaping in others The site should be a space for people to learn how to live harmoniously with nature, perhaps through small-scale good growing or sustainable foraging or a social enterprise or community garden centre like	No allocations are made as part of the Local Plan, which is supported by a Green Belt and Metropolitan Open Land Study (2015-2019). The proposals to re-wild the area are noted. The Council is committed to maintaining the sensitive balance between the need for development and the protection of Green Belt and MOL.

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			Growing Concerns in Tower Hamlets or Living Under One Sun sites in Haringey It should be a place to showcase the area's industrial heritage by retaining and enhancing the site's historic buildings It is a valuable part of the green lung, linking the Middlesex Filter Beds and the Essex Filter Beds and should be reconnected to the surrounding sites. Retaining an area of public hard landscaping would complement the surrounding area. I live in Hackney on the banks of the Lee Navigation, and this area is essential to mine and my family's physical and mental wellbeing. My mother, who has dementia walks here every day. Please preserve this special area for future generations to enjoy.	
2528	Ms Katie Glasgow	Planning Officer Hackney Council	We recognise that the Council is in the process of reviewing the Borough's Green Belt and Metropolitan Open Land. Hackney Council is eager to discuss the findings of this review to understand how this may inform the Local Plan policies and the review of the boundaries of designated Green Belt and /or Metropolitan. In principle I am sure neither borough would like to see any deterioration in the quality or quantum of open space.	Noted. The Council is currently conducting a Habitats Regulations Assessment (HRA) to ascertain the level of impact the Draft Local Plan (once adopted) will have on both the Lee Valley Regional Park and the Epping Forest SAC. We will continue to work in cooperation with the London Borough of Hackney Council on strategic matters.
2633	Ms Kate Bundock		An increase in population will ultimately lead to the need for cemetery places. As other boroughs will experience the same problem, what provision will be made? Will part of Essex be a burial ground?	This comment is noted in preparing the Proposed Submission Local Plan. The Council acknowledges the need to improve and increase the provision of burial space in the borough.

Policy 85: Open Spaces Sport and Recreation				
ID	Full Name	Organisation	Comment	Council (Officers) Response
943	Mr Mathew Frith		We support this in principle, but would want to see part C amended along the lines of: "I where relevant, proposals must demonstrate that there are no adverse impacts to the setting or	Noted. Support in principle welcomed. Proposed amendment will be reviewed.

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Policy 85: Open Spaces Sport and Recreation				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			visual appearance of the historic parks and gardens, and the ecological value of open spaces. Lighting and additional disturbance of sites can have unintended impacts on species such as groundnesting birds and bats.	
996	The City of London	The Conservator's of Epping Forest	It is disappointing to note that at the Regulation 18 stage of the Local Plan process key documents such as the Open Space Strategy; Playing Pitch Strategy; Green and Blue Infrastructure Study and Green Belt Review are only 'in process'. It	Noted. Updating the Local Plan evidence base is an ongoing task. The Council now has a lot of these documents completed and finalised and will use the information that they have to inform the Pre-Submission version of the Plan.
1094	Milena Petrovic	Sustainable Development Officer Thames Team Natural England	As highlighted in our recent comments to the council about the production of an Open Space Strategy and Green Infrastructure Strategy for the borough, there is an opportunity for the Local Plan (and these strategies) to think more widely about Epping Forest SAC avoidance and mitigation packages and preparing borough-wide strategic measures. In particular we highlighted that as part of the strategic solution, developments of 100 residential units or more within the 0-6.2km Zone of Influence of Epping Forest SAC need to provide a suitable bespoke mitigation package. Where there is a lack of funding for identified open space and GI opportunities, it may be possible for the developers to fund these projects as part of their bespoke mitigation package. The Local Plan, alongside these strategies, can be used as a vehicle to identify potential developer mitigation options around the borough. Having this sort of strategic approach to the avoidance and mitigation measures for Epping Forest SAC would help in the evidence base for the HRA to show that the quantum of housing proposed is deliverable. Currently, the lack of identified avoidance and mitigation measures for Epping Forest SAC gives some level of risk to the deliverability of this Plan.	Noted. The Council is currently considering the final version of the 2019 Epping Forest Visitor Survey. We have also commissioned an HRA on the Plan and the findings of both of these documents will be worked into the next publication version of the Local Plan.
1114	Ms Patricia Braga		And - my reason for objecting so strongly - I wish to see the reinstatement of Selbourne Park and the retention of Walthamstow town centre's best feature (its lime tree avenue)	Noted. The Lime Tree avenue in Selbourne Park will now be retained as part of the development scheme of the Mall.

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Policy 85: Open Spaces Sport and Recreation				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			to be the focus around which we build a green growing/jobforall/inclusive and sustainable borough (please note all or nothing chopping down trees for a cycle way is not sound but inviting tourists to see our park/Green Market/diversity of spirit would be great for tourism) Hopefully Waltham Forest will become individual from anywhere else (so William Morris would not be turning in his grave)	
1515	Helen Monger	London Parks and Gardens Trust	Objection This remains an omission Policies should ensure that development which benefits from its proximity to a public open space contributes to its ongoing maintenance. LPGT wants to ensure that, in future, development which benefits from its proximity to a public open space contributes to its ongoing maintenance. This could be covered in Policy 85.	Noted. For further discussion regarding Section 106 funding.
1516	Helen Monger	London Parks and Gardens Trust	Object to omission See Policy 85 D & E. These criteria should apply to all parks to ensure their long term future to meet the physical & mental needs of residents. distinguish between criteria that apply specifically to active sport and recreation and those that apply to all open spaces. We welcome consideration of accessibility and different ways of enjoying open space and suggest rewording title of Policy 85 - delete "sport and recreation"	Noted. We will consider this and publish any changes necessary in the next draft of the Local Plan.
1517	Helen Monger	London Parks and Gardens Trust	At Reg 18 stage there was no mention of historic parks and gardens in the whole of the Design, Heritage, Culture and Amenities section.	Noted. We will review our policy on parks and open spaces and publish any amendments in the next draft of the Local Plan.
1558	Mark Furnish	Sport England	Sport England supports Policy 86 as it aligns with Sport England's Planning Policy as well as highlighting the importance of the emerging Playing Pitch Strategy to steer what sport facility provision is required to meet future current and future needs.	Noted. Support welcome.
1883	Mike Chrimes		should b to provide e children playground in areas where they are currently unavailable eg north Chingford and large areas of Leyton	Noted. We will consider this in the next draft of the Local Plan.

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Policy 85: Open Spaces Sport and Recreation				
ID	Full Name	Organisation	Comment	Council (Officers) Response
1997	Mr Paul O'Neil	Associate Director Metropolis PDG Ltd	Given that the stadium site is no longer fit for purpose and is not required, the final version of the plan should confirm that the site is suitable for redevelopment. It should also be noted that even if the playing pitch strategy review confirms a need for additional sports pitches in the Borough, there is a surplus of existing playing pitches in the vicinity of the former Wingate Stadium site, and it would be more suitable to bring forward this site for redevelopment - given that it is located in an identified area for intensification; rather than consider releasing land from MOL or Green Belt designations to meet housing need.	Noted. Site allocations are part of a separate project that will be consulted on separately in Autumn 2020.
1998	Mr Paul O'Neil	Associate Director Metropolis PDG Ltd	Playing pitches, if required, are a compatible use on land designated as MOL or Green Belt and it would be more appropriate to locate new residential development on suitable sites, such as the former stadium site, where there is existing infrastructure and a recognition that this area is in need of regeneration.	Noted. Site allocations are part of a separate project that will be consulted on separately in Autumn 2020.
2002	Mr Paul O'Neil	Associate Director Metropolis PDG Ltd	The Playing Pitch Strategy Review has not been updated since 2011. The previous study was undertaken when the stadium site was still in use. This has not been the case for over 8 years.	Noted. A new Playing Pitch Strategy was published in December 2019. This work is ongoing and is expected to be completed in Autumn / Winter 2020. Site allocations are part of a separate project that will be consulted on separately in Autumn 2020.
2003	Mr Paul O'Neil	Associate Director Metropolis PDG Ltd	Figure 17.2 includes the Wingate Stadium as a 'playing field'. This designation should be removed. It is not considered legitimate to include the identification of the former stadium site, where the evidence base has not been updated to support this conclusion.	Noted. Site allocations are part of a separate project that will be consulted on separately in Autumn 2020.
2004	Mr Paul O'Neil	Associate Director Metropolis PDG Ltd	Inclusion of the Wingate Stadium site also conflicts with the other policies in the draft plan, including those set out in Policy 7.	Noted. Site allocations are part of a separate project that will be consulted on separately in Autumn 2020.

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Policy 85: Open Spaces Sport and Recreation				
ID	Full Name	Organisation	Comment	Council (Officers) Response
2420	Ms Patricia Braga		There has been no reference made to Selbourne Park. I feel that it should be protected. Forward thinking in the borough needs to reside around green jobs and places but still retaining the avenue. Please do not destroy any more of our green and historic places.	Noted. The Town Square in Walthamstow is key to the regeneration of the Central Area of the borough. A planning application has been approved under the adopted Local Plan and as part of approval conditions some of the greenspace including the avenue of lime trees that made up part of the original Selborne Park will be retained.
2576	Anne Hamshaw		The Council may decide to use parkland, this would have a detrimental effect both on community and the environment. Compared to some London Boroughs other than the forest, which is the City of London, we have very little in the form of parks and play land.	The plan seeks protect areas of Green Belt/Metropolitan Open Land. There is no plan to allocate any parkland for development as it is an essential component in Waltham Forest Council's parks and open space strategy with many of the policies in the Local Plan also considering how public realm can be improved in the Plan Period. The Council is preparing an additional Local Plan document on site-specific allocations. This will identify the full list of sites identified for redevelopment. This new document will provide opportunity to apply the policies of the plan on specific sites, providing more details on how new developments could be integrated within existing local areas.

Policy 86: Biodiversity and Geodiversity				
ID	Full Name	Organisation	Comment	Council (Officers) Response
547	Claire Weiss		There needs to be a stronger emphasis on addressing the climate change emergency since the Council has signed a declaration about this and it doesn't appear to have been picked up in this draft plan. Current proposals being put forward by the Council on its own land such as the Lea Bridge station sites, should be re-examined in the light of the declaration. In particular the proposal to destroy the Orient Way Pocket Park, which was designed to act as a pollution buffer to the Orient Way cargo road should be dropped since this park is a mature and biodiverse habitat, has 91 trees, helps	This comment is noted, the Local Plan will be supported by an up to date evidence base including an updated Biodiversity Action Plan and a Pollinator Action Plan within its Green and Blue Infrastructure Strategy document in addition to its Habitats Regulation Assessment and Sustainability Appraisal. As such the Plan by the next stage will contain further detail in relation to the Climate Emergency declared by Waltham Forest Council.

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Policy 86: Biodiversity and Geodiversity				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			with flood prevention and promotes well-being. It will be needed by the extra residents about to populate this area.	
636	Gordon Turpin	Highams Park Planning Group	Lea Bridge and Church Road, Walthamstow Town Centre,87 A-D Supportive of conservation measures and protection of green spaces in the local plan.	Noted. Support welcome.
764	LVRPA	Lee Valley Regional Park Authority	The Authority welcomes the recognition given in the draft Local Plan to the Regional Park as a defining characteristic of the Borough and its role as a significant asset providing valuable benefits to local communities.	Noted. Support welcomed.
800	LVRPA	Lee Valley Regional Park Authority	Supporting text for Policy 86 Biodiversity and Geodiversity should therefore, under Paragraph 17.11, make reference to partnership working with the Lee Valley Regional Park Authority as well as Natural England and the Conservators of Epping Forest. Paragraph 17.12 should reference the Authority's new Lee Valley Biodiversity Action Plan which was recently adopted and includes contributions from borough officers.	Noted. Amend Paragraph 17.11 to make reference to partnerships working with LVRPA, Natural England as the Conservators of Epping Forest. Reference Lee Valley Biodiversity Action Plan in 17.12.
801	LVRPA	Lee Valley Regional Park Authority	it currently reads the opening statement under Policy 86 'Biodiversity and Geodiversity' suggests it is only concerned with proposals that will affect biodiversity (and geodiversity). This could mean that a development where there is no impact would have no requirement to add features for biodiversity. Local planning authorities are guided by the NPPF when determining planning applications to encourage opportunities "to incorporate biodiversity improvements in and around development", especially where this can secure measurable net gains for biodiversity (para 175 d). It is considered that an amendment to the opening sentence under Policy 86 would be appropriate as follows: Proposals affecting should seek to improve biodiversity and geodiversity resources in the Borough and will ensure that: ..	Noted. Reword to read: "Proposals should seek to improve biodiversity and geodiversity resources in the borough and will ensure that."

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Policy 86: Biodiversity and Geodiversity				
ID	Full Name	Organisation	Comment	Council (Officers) Response
802	LVRPA	Lee Valley Regional Park Authority	Policy 86 B should also be amended. It states that "All major development proposals are required to include a biodiversity survey of the site". Whilst this is supported it is also the case that smaller scale developments could equally have an impact on biodiversity. All proposals should consider biodiversity from the outset to ensure relevant surveys are carried out and this should be clarified in the policy. The supporting text under para 17.11 that ecological assessments must be developed from the earliest stages of the pre- application process is welcomed, this will help to ensure timely assessments of biodiversity value and well planned mitigation.	Noted. Biodiversity studies will be required on applications for 10 units and above.
803	LVRPA	Lee Valley Regional Park Authority	A further amendment is suggested in relation to Policy 86 D to strengthen its intent so that it states: "Where opportunities arise, d Development proposals should seek to must provide measures to support species and habitats through the use of landscaping on or adjacent to buildings."	Noted. Amend Policy 86D to read "Where opportunities arise. Development proposals should seek to must provide measures to support species and habitats through the use of landscaping on or adjacent to buildings."
804	LVRPA	Lee Valley Regional Park Authority	It is noted that the Council has recognised that transitional vacant or derelict land can have ecological value and that under Policy 86 this land 'should be protected on a temporary basis'. It would be helpful if the supporting text for this policy could explain how this might be achieved.	Noted. Develop supporting text for transitional vacant and derelict land and the possibility of it having ecological value.
944	Mr Mathew Frith		We welcome and support this. However, we would recommend that the net gain element (in Part C) is made more explicit, in that all development proposals should aim to secure biodiversity net gain (as part of Part A), and only where this is not possible on site, then offsetting elsewhere in the borough will be permitted in line with the objectives of Part C.	Noted. Support welcomed. The Council will review this proposed amendment.
945	Mr Mathew Frith		Paras 17.11 - 17.20: We welcome and support these	Noted. Support welcomed.

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Policy 86: Biodiversity and Geodiversity				
ID	Full Name	Organisation	Comment	Council (Officers) Response
994	The City of London	The Conservator's of Epping Forest	Of great concern to us is that the Strategic Objective 11 does not mention biodiversity.	Noted. Amend Strategic Objective 11 on Page 13 to include a reference to biodiversity.
995	The City of London	The Conservator's of Epping Forest	Although Policy 86 addresses biodiversity issues, they are largely dealt with through the prism of development; as an adjunct to and secondary to development. For example, Policy 86C refers to “enhancement where appropriate” and Policy 84Ciii states that development should increase “biodiversity value”. These are welcome statements but relate only to development and are made in isolation without a clear overarching Objective. We would contend, especially given the need to “buffer” the internationally-important Forest, that biodiversity issues need to be integral to and uppermost in decision-making across the whole borough (see below for further discussion of the duties of a “Competent Authority” under the Habitats Directive).	Noted. We will review this position and publish any amendments made to the Plan in the next version.
998	The City of London	The Conservator's of Epping Forest	Competent Authority duty This policy needs to be explicit about the borough's role as a 'Competent Authority' under the Habitats Regulations 2017 (Habitats Directive). It needs to set out that under the law, as Competent Authority, the borough is responsible for ensuring that its Local Plan must not have an adverse effect on the integrity of Epping Forest SAC either alone or, importantly, in combination. In order to assess the impact of the Plan it is a requirement that the Plan is subject to a Habitats Regulations Assessment (HRA) and, if necessary, a more detailed Appropriate Assessment. An HRA needs to be carried out early in the Plan process. The significant effects on the Epping Forest SAC are likely to come from three impact pathways: (i) disturbance from recreational pressure; ii) intensification of existing urbanisation impacts; and (iii) atmospheric pollution from Nitrogen Oxides (NOx) and Ammonia (NH3), particularly from increased traffic and	Noted. The Council is presently working with consultants on conducting a new HRA which will inform the next version of the Plan in which impacts on Epping Forest and the Lee Valley Regional Park will be thoroughly investigated. Recommendations from the HRA will be published in the next iteration of the Plan.

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Policy 86: Biodiversity and Geodiversity				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			<p>congestion. Therefore, we are concerned that the Evidence Base (Section 2, Table 2.1, of the LBWF Local Plan Appendices document) does not include reference to an HRA. does not reflect these requirements. It does not emphasise the international importance of the Forest nor its irreplaceability. Moreover, it significantly confuses matters by presenting a mish-mash of statutory and non-statutory designations and by mentioning some sites and not others. Significantly, and irrespective of Policy 87 (see comments below), this approach has the effect of diluting the “policy message” statutory protection afforded to the Forest. In doing so it does not address the strict and more stringent requirements of the Habitats Directive. It does not highlight the need for an SAC Mitigation Strategy to be agreed and in place prior to development permissions. The City Corporation would wish to work closely with the borough and Natural England, as early as possible, to ensure that an HRA is conducted in a manner that will ensure that it addresses all the SAC issues.</p>	
999	The City of London	The Conservator's of Epping Forest	<p>The statement heading Policy 86. A-J (pages 176-177) could be interpreted as suggesting that Policy 86 is only concerned with proposals that directly affect biodiversity and geodiversity. As currently constituted Policy 86 could be interpreted to indicate that where there is no biodiversity impact associated with a development there would be no requirement to add features for biodiversity or maintain new exposures of geodiverse interest.</p>	<p>Noted. We will review the heading of this policy and publish any amendments to the wording in the next version of the Local Plan.</p>
1000	The City of London	The Conservator's of Epping Forest	<p>The City Corporation supports Policy 86.B regarding biodiversity site surveys but would challenge the borough that while the term ‘major development’ is not defined in the Glossary, smaller-scale developments could equally have an adverse impact on biodiversity and geodiversity. The City Corporation would challenge the borough to broaden the development range under which biodiversity survey is a requirement.</p>	<p>Noted. Support welcomed. We will review this when the HRA is finalised and publish any updates necessary in next version of the Local Plan.</p>

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Policy 86: Biodiversity and Geodiversity				
ID	Full Name	Organisation	Comment	Council (Officers) Response
1100	Milena Petrovic	Sustainable Development Officer Thames Team Natural England	We advise that Policy 86H is not currently compliant with the Habitats Regulations. Development proposals which are likely to have an adverse impact on any internationally designated wildlife site, either alone or in-combination, must satisfy the requirements of the Conservation of Habitats and Species Regulations determining site specific impacts and avoiding or mitigating against impacts identified. Development proposals should protect and enhance the nature conservation or geological interest of nationally important wildlife sites, as shown on the Policies map. This will be achieved by refusing development proposals where significant harm to an asset cannot be avoided, mitigated or, as a last resort, compensated. The weight accorded to an asset will reflect its status in the hierarchy of biodiversity and geodiversity designations.	This is noted. It is proposed to review Policy 86H to ensure that it is fully compliant with Habitats Regulations.
1188	Mrs Jean Turpin		Garden development should be discouraged, as gardens create important wildlife corridors and feeding grounds for insects, birds and animals.	Noted. Policy surrounding the retention of gardens will be considered before inclusion in the next draft of the Local Plan.
1428	Jennefer Peters	Senior Strategic Planner, London Plan Team Greater London Authority	The draft Local Plan clearly illustrates areas of nature conservation and this is welcome. It should also take note of particularly significant areas of nature conservation beyond the borough boundary. For example, the Chingford Reservoirs, lie adjacent to the borough in the north-west and are a nationally designated Site of Special Scientific Interest (SSSI). Epping Forest Special Area of Conservation also lies, primarily to the north and this area too, should be identified.	Noted. We will review our position on this and publish any update in the next publication of the Local Plan.
1632	Bob Bennet		The policy is to be welcomed but it is unclear to why the Chingford to Liverpool Street is designated a site of 'importance of nature conservation'. While it does provide a green corridor which allows birds and animals to travel along it, bearing in mind it is sprayed with weed killer and bushes and trees are heavily pruned it is doubtful it has any inherent nature	Noted. Support welcome. Policy refers to the green areas, rather than the railway itself.

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Policy 86: Biodiversity and Geodiversity				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			conservation importance. The policy and designation should give it a different description.	
1892	Mike Chrimes		Policy on biodiversity could include potential for working with local bee societies, fishing clubs, garden societies' allotment groups, Epping Forest, River Lea, Arboricultural Association, English Nature, RSPB etc to provide firmer guidance and informed knowledge about the state of the habitat. The RSPB bird survey could be included and possibly butterfly maps, preferably over time to show what is happening. What about people converting front gardens to parking bays-that should be referred to in parking policy and there should be information on the LBWF website about environmental implications.	Noted. The Council is conducting a Habitats Regulations Assessment which will test the impact of the Local Plan against set criteria. Recommendations from this document will inform the next draft of the Local Plan.
2226	Lucy Read	Planning Advisor, Sustainable Places Environment Agency	Generally supportive of policy, should include wording that states that development proposals should avoid impacting on species and Habitats of Principle importance. - should development be allowed it must show how it would reduce disturbance to a minimum. Within point H sites of local importance should also be considered. All proposals likely to impact on the Ancient Woodland, aged and veteran trees Local Nature Reserves Local Wildlife Sites and Potential Wildlife sites Local Geological Sites Protected rare endangered or priority species or other sites of geological or geomorphological importance. Proposals affecting these sites will only be permitted where the proposal is justified against the above criteria, where it can be demonstrated that the proposed mitigation or compensatory measures are equivalent. Pleased to see that the principle of biodiversity net gain has been included in point C of the policy Noted that the plan does not reference the presence of non-native and invasive species and their potential impact on biodiversity - this should be an additional point in the policy (17.11) Add a point that requires	Noted. Support welcomed. The plan is currently undergoing an HRA assessment, the findings of this will be worked into the next publication version of the Local Plan, which will go out for consultation in Autumn 2020.

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Policy 86: Biodiversity and Geodiversity				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			lighting along all watercourses and their buffer zones is designed to minimise impact.	
2980	Milena Petrovic	Sustainable Development Officer, Thames Team Natural England	There is a likelihood that mandatory net gain may come forward soon. This would mean that all development would need to provide net gain. It is up to the Council to decide whether they want to future proof their Local Plan to incorporate mandatory net gain for all developments now, or update as appropriate when mandatory net gain officially comes through. Regardless, biodiversity net gain is strongly supported by the National Planning Policy Framework (NPPF) and features prominently in the government 's 25 Year Environment Plan. We therefore recommend policy inclusion of biodiversity net gain and the use of an approach based on the Defra biodiversity metric.	This point is noted. It is proposed to review the policy to incorporate the point made regarding the inclusion of mandatory net gain for all developments where necessary.
2981	Milena Petrovic	Sustainable Development Officer, Thames Team Natural England	Natural England has recently released the Defra Biodiversity Metric 2.0. The new metric is accompanied with detailed guidance and a tool to apply the metric. Natural England encourages the incorporation of the 10 best practice principles developed by CIRIA/CIEEM/IEMA for those delivering biodiversity net gain. The Plan should set out a strategic approach, planning positively for the creation, protection, enhancement and management of networks of biodiversity.	This point is noted. It is proposed to review this policy to incorporate this point if considered necessary.
2982	Milena Petrovic	Sustainable Development Officer, Thames Team Natural England	There should be consideration of geodiversity conservation in terms of any geological sites and features in the wider environment. A strategic approach for networks of biodiversity should support a similar approach for green infrastructure.	This point is noted. It is proposed to review the policy to incorporate this point as considered necessary.
2983	Milena Petrovic	Sustainable Development Officer,	We support the production of a Green Infrastructure Strategy that would plan for GI on a more strategic level. Planning policies and decisions should contribute and enhance the	This point is noted. The Council has commissioned an HRA on the Plan and the findings of both of these documents will be worked into the next publication version of the Local Plan.

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Policy 86: Biodiversity and Geodiversity				
ID	Full Name	Organisation	Comment	Council (Officers) Response
		Thames Team Natural England	natural and local environment, as outlined in para 170 of the NPPF. Plans should set out the approach to delivering net gains for biodiversity. Net gain for biodiversity should be considered for all aspects of the plan and development types, including transport proposals, housing and community infrastructure.	

Policy 87: The Lee Valley Regional Park and Epping Forest				
ID	Full Name	Organisation	Comment	Council (Officers) Response
454	Mrs Krysia Sivyser		Epping Forest is a very important feature. It is recognised we need to have more trees, so any suggestions of encroaching on forest land should be resisted.	Noted. The Local Plan resists any development that will have an adverse impact on Epping Forest Special Area of Conservation.
775	LVRPA	Lee Valley Regional Park Authority	Inclusion of Policy 87 'The Lee Valley Regional Park and Epping Forest', and its supporting text, carries across key elements of policy from the Development Management Policies Document (DM12), that will assist in protecting and enhancing the Park. Paragraphs 17.23-24 also set out the statutory role of the Park Authority and its planning functions. These inclusions are welcomed and supported.	Support noted.
777	LVRPA	Lee Valley Regional Park Authority	The current policy reference supporting the Park Development Framework (currently DM12 H) has been moved to supporting text under para 17.21. The Authority wishes to see this reinstated. It is important that a policy statement supporting the Park Development Framework Area proposals is included, particularly as all the PDF Area proposals which relate to the Park within Waltham Forest have been adopted. This would fulfil the requirements of the Park Act Section 14 (2) (a), a matter that was previously covered in both the Examination of the Core Strategy 2011 and in the 2013 Examination of the Development Management Policies Document, please refer to the detail in the following Inspector's Reports	Noted. Reinstate reference to (DM12 H) into Policy 87 to fulfil the requirements of Park Act Section 14 (2) (a).

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Policy 87: The Lee Valley Regional Park and Epping Forest				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			http://static.walthamforest.gov.uk/sp/documents/core_strategy_inspector_s_report_final-lr.pdf http://static.walthamforest.gov.uk/sp/Documents/DMP-Local-Plan-Inspector- Final-Report-7-Aug-13.pdf	
806	LVRPA	Lee Valley Regional Park Authority	<p>Proposed Amendments to Policy 87 The Lee Valley Regional Park and Epping Forest Proposals which affect the Lee Valley Regional Park and/or Epping Forest will ensure that: A. Development proposals include measures for the protection, enhancement and where possible, the extension of the borough's network of Green Corridors. B. Development proposals affecting the Lee Valley Regional Park or Epping Forest should be sensitive and proportionate, delivering enhancements where possible and must not contribute to adverse impacts on ecological integrity, amenity or visitor enjoyment. C. Development proposals in proximity to the Lee Valley Regional Park should improve access and links to the park and its waterways. D. Development proposals in proximity to the Epping Forest Special Area of Conservation (SAC) should improve access and biodiversity enhancements in line with any requirement of Natural England and the Epping Forest Conservators</p> <p>The Council supports the Lee Valley Regional Park Authority's Park Development Framework. The contents of the Lee Valley Park Development Framework will be a material consideration in the determination of planning applications.</p> <p>17.21 The Lee Valley Regional Park and Epping Forest are major assets for Waltham Forest providing valuable benefits to local communities in terms of access to nature and to healthy outdoor recreation. The Council supports Epping Forest 's long term management objectives and Lee Valley Regional Park Authority 's Park Development Framework. The Council will work cooperatively with the Lee Valley Regional Park Authority and the Epping Forest Conservators. 17.23 The Lee Valley</p>	The proposed amendments in relation to Policy 87 and its supporting text are noted for incorporation at the next stage of the Local Plan.

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Policy 87: The Lee Valley Regional Park and Epping Forest				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			<p>Regional Park Authority (LVRPA) is a statutory authority created by the Lee Valley Regional Park Act 1966 (The Park Act). It has a statutory responsibility to either provide directly or work with partners to provide facilities for sport, recreation, leisure, entertainment and nature conservation throughout the Park. Section 14 (1) of the Park Act requires the Authority to prepare a plan setting out proposals for the future management and development of the Regional Park and riparian authorities such as Waltham Forest are required to include those parts of the plan affecting their area within their own relevant planning strategies and policies (Section 14(2) 8 (a)) although inclusion does not infer that the planning authority necessarily agrees with them (Section 14(2) (b)). Both the Park Plan 2000 and The Park Development Framework Area Proposals are relevant in terms of Section 14 (2) of the Park Act and are formal statements of the Authority's position in respect of development within the Regional Park. 17.24 Further, sections 14 (subsections 4-7) of the Park Act requires local planning authorities to consult with the LVRPA on applications for planning permission which they consider could affect the Park. Section 14 (subsections 8-9) allows the LVRPA to refer the decisions of the riparian authorities to the Secretary of State if it is considered by the LVRPA that the decision taken materially conflicts with the proposals of the Authority for the development of the Park.</p>	
857	Ms Tessa Craig		<p>We welcome the policy intent to support proposals to improve access and likes to the Lee Valley Regional Park and its waterways.</p>	Noted. Support welcomed.
872	Alice Roberts	Campaign to Protect Rural England (CPRE)	<p>We would be very concerned if the sites at Lea Bridge referred to were the Thames water Depot or the Waterworks Centre both of which are important parts of the Lea Valley Regional Park and very clearly important as MOL, central as they are to</p>	Noted. The Site Allocations document are part of a separate project to The Local Plan and as such it will be subject to a separate public consultation exercise.

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Policy 87: The Lee Valley Regional Park and Epping Forest				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			surrounding MOL. We would strongly object to either of these sites being put forward for development.	
946	Mr Mathew Frith		We welcome and support this.	Noted. Support welcomed.
1001	The City of London	The Conservator's of Epping Forest	The City Corporation welcomes the recognition given in the draft Local Plan to both Epping Forest and the Lee Valley Regional Park as major assets for the borough. However, given the relative size of Epping Forest's contribution, and its alphabetical sequencing, it is surprising that Epping Forest is mentioned after, rather than before, the Regional Park. A separate Policy for Epping Forest as a whole, not just the SAC parts, is welcome as the Forest should be considered holistically. However, as discussed in detail above Policy 87 needs to be explicit about the protection afforded to the SAC. The Mitigation Strategy should be clearly stated as a sub-Policy within this Policy 87. Furthermore, we would wish to see this Policy not just framed in terms of references to development but also see a statement about partnership working between the borough and The City Corporation to buffer and enhance the Forest environment and integrate green infrastructure elsewhere in the borough with the Forest's open space. This latter issue of integration would consider the use of native tree species close to the Forest for example and even the use of Forest tree seeds in providing new trees in remaining green infrastructure areas.	Noted. Support welcomed. The Council will review this and publish any updates necessary to policies in the next version of the Local Plan.
1002	The City of London	The Conservator's of Epping Forest	As an Outer London borough, Waltham Forest has a particular role to play in developing links through Green Corridors to Green Arc. Green Arc is designed to be a larger, accessible protected area in which the Forest would be embedded, and the borough clearly linked through the Lee Valley and Roding	Noted. It is proposed to review the policy to make reference to The Green Arc.

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Policy 87: The Lee Valley Regional Park and Epping Forest				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			corridor. Green Arc also points the way to the importance of Suitable accessible Greenspaces and corridors (SANGS or SANGSC) which will be the key change required in the Local Plan if it is to provision enough new open space in the face of the step change which is being proposed in the number of housing units and residents. These new residents will require both built and natural green infrastructure if the quality of life is to be maintained or improved and if the wildlife and wilderness or semi-natural values of nature conservation sites are to be sustained for the long-term.	
1004	The City of London	The Conservator's of Epping Forest	The borough's Vision Statement for the Local Plan 'Waltham Forest as a place of leisure'(page 12) references the role of the City Corporation. A positive way of cementing the links between the borough and the City Corporation would be the outlining of the Vision for Epping Forest. We would request that this is included and set out in full in the future drafts of the Local Plan (at Reg 19 and beyond). We consider that It is most important that this Vision is reflected in the Local Plan Vision, given that it came out of joint working with the borough and other authorities, in developing a vision for the Forest (Quality of Life Report 2003 - Levett-Therivel).	Noted. We will review this and provide updated wording in the next publication of the Local Plan.
1034	Ms Alison Blom-Cooper	Planning Department Epping Forest District Council	Policy 87 The Lee Valley Regional Park and Epping Forest: The crafting of Policy 87 and the supporting text does not appear to provide the correct policy protection and tests as they relate to the EFSAC.	Noted. We will review this and amend the wording surrounding the Lee Valley Regional Park and Epping Forest to provide the correct policy protection in the next publication of the Local Plan.
1035	Ms Alison Blom-Cooper	Planning Department Epping Forest District Council	For assistance, the reference to the Habitats and Species Regulations in Paragraph 17.22 should be Habitats and Species Regulations 2017 (as amended) rather than 2010. Furthermore, there is no reference to any Mitigation Strategy within either the policy or its supporting text. This is of concern for the reasons set out above.	Noted. We will amend the policy accordingly.

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Policy 87: The Lee Valley Regional Park and Epping Forest				
ID	Full Name	Organisation	Comment	Council (Officers) Response
1037	Ms Alison Blom-Cooper	Planning Department Epping Forest District Council	For assistance, the reference to the Habitats and Species Regulations in Paragraph 17.22 should be Habitats and Species Regulations 2017 (as amended) rather than 2010. Furthermore, there is no reference to any Mitigation Strategy within either the policy or its supporting text. This is of concern for the reasons set out above.	Noted. We will amend the policy accordingly.
1038	Ms Alison Blom-Cooper	Planning Department Epping Forest District Council	EFDC understand the desire to promote greater use of the Epping Forest and that walking and cycling routes to it should be strengthened (noting that such an approach is identified at a number of parts of the Draft Local Plan). However, such an approach results in a potential conflict within the context of known issues in relation to visitor pressures and without a full assessment the Council cannot understand impacts or be assured that the Mitigation Strategy will deal with the negative effects of development proposed.	Noted. The Council is currently considering the final version of the 2019 Epping Forest Visitor Survey. We have also commissioned an HRA on the Plan and the findings of both of these documents will be worked into the next version of the Local Plan.
1092	Milena Petrovic	Sustainable Development Officer Thames Team Natural England	The final Local Plan should give great weight to the protection of Epping Forest SAC. The site is particularly sensitive to recreational pressure and traffic-related air pollution, which are both predicted to increase as a result of planned development in the surrounding Authorities. Currently, Policy 87 covers both Epping Forest SAC and Lee Valley SPA; for clarity and to better reflect the uniqueness of the two sites, it would be better for these two designated sites to have separate policies. Both European sites need stronger policy wording.	Noted. The Council is currently considering the final version of the 2019 Epping Forest Visitor Survey. We have also commissioned an HRA on the Plan and the findings of both of these documents will be worked into the next version of the Local Plan.
1098	Milena Petrovic	Sustainable Development Officer Thames Team Natural England	Currently, Policy 87 covers both Epping Forest SAC and Lee Valley SPA; for clarity, it would be better for these two designated sites to have separate policies. Stronger policy wording is needed to ensure the final Local Plan gives great weight to the protection of the European site. As such it would be beneficial for evidence to be gathered on the potential threats to the integrity of the SPA through planned development, including recreational pressure and hydrological	Noted. We will consider this and make any amendment necessary in the next publication of the Local Plan.

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			impacts, and the results included in the evidence base. This may then inform the nature of protective policies included within the final Local Plan.	
1102	Milena Petrovic	Sustainable Development Officer Thames Team Natural England	In accordance with the Paragraph 171 of NPPF, the plan should allocate land with the least environmental or amenity value. Natural England expects sufficient evidence to be provided, through the SA and HRA, to justify the site selection process and to ensure sites of least environmental value are selected, e.g. land allocations should avoid designated sites and landscapes and significant areas of best and most versatile agricultural land and should consider the direct and indirect effects of development, including on land outside designated boundaries and within the setting of protected landscapes.	The Council is preparing an additional Local Plan document on site-specific allocations. This will provide opportunity to apply the policies of the plan on specific sites, providing more details on how new developments could be integrated within existing local areas. Sites purposely identified for redevelopment as included in the Site Allocations will be carefully selected. A methodology for site selection will be included in the document. Separate consultation on the preparation of the site allocations document will be undertaken.
2422	Tele Lands Improvement Ltd		Whilst Lands Improvement themselves do not currently have any land within the London borough of Waltham Forest (the Council), they have significant regional concerns regarding the need to appropriately mitigate the effects of new development on Epping Forest Special Area of Conservation (SAC). Lands Improvement have been actively involved in the Epping Forest Submission Version Local Plan (SVLP) Examination in Public and these representations identify the lessons learnt through this process in the hope that it will assist the Council in the next stages of their plan making. Epping Forest is designated as a Special Area of Conservation (SAC) under the European Union Habitats Directive. Under the Conservation of Habitats and Species Regulations 2017 (Habitat Regulations), any plan or projects that are likely to have a significant effect on the SAC, either alone or in combination with other plans or projects, must be subject to an Appropriate Assessment (AA). The purpose of an AA is to determine whether any plan or project, either alone or in combination, will or will not harm the integrity of the protected site, taking into account mitigation	Noted. The Council is currently conducting a Habitats Regulations Assessment (HRA) To ascertain the level of impact the Draft Local Plan (once adopted) will have on both the Lee Valley Regional Park and The Epping Forest SAC.

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			<p>measures as appropriate. Waltham Forest therefore has a legal duty as a 'competent authority' under the Habitat Regulations to protect Epping Forest SAC from the effects of development (individually and in combination) and is required to undertake a Habitat Regulations Assessment for the Local Plan. There are two issues that are likely to affect Epping Forest SAC as a result of growth - the impact of increased levels of visitors using the Forest for recreation arising from new development (referred to as recreational pressure). A Visitor Survey of the SAC was undertaken in 2018 to identify a Zone of Influence (Zol) for recreational pressure which identified that 75% of visitors travelled up to 6.2km to visit the SAC. Visitor Surveys are usually required to be undertaken in summer months and another visitor survey is currently being carried out, which may alter the recreational pressure Zol. The result of damage to the health of the protected habitats and species of flora within the Forest, including trees and potentially the heathland habitats, from air pollution generated by increased vehicle usage (referred to as air quality). Draft London Plan Habitat Regulations Assessment These representations identify the gaps within the Draft Waltham Forest Local Plan (WFLP) that need remedying in this respect.</p>	
2424	Tele Lands Improvement Ltd		<p>Policy 87 is weak as it is not clear when a development is considered to "affect" Epping Forest SAC or how close "in proximity" is in Part D. Given that Natural England have identified that all new residential development within the Zol is likely to have an effect, and that Waltham Forest lies wholly within this Zol, all new development in Waltham Forest is likely to trigger assessment under Policy 87 and under the Habitat Regulations. However, this is not clear in Policy 87 and specific reference should be made to the Zol for Epping Forest SAC (6.2km at present but may be revised after a Summer 2019</p>	<p>Noted. The Council is currently conducting a Habitats Regulations Assessment (HRA) to ascertain the level of impact the Draft Local Plan (once adopted) will have on both the Lee Valley Regional Park and the Epping Forest SAC.</p>

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ID	Full Name	Organisation	Comment	Council (Officers) Response
			<p>Visitor Survey of Epping Forest SAC). Furthermore, Policy 87, as written, makes no reference to the need to mitigate against recreational pressure on Epping Forest SAC as a result of new development, either by SAMMs, SANGs or alternative open space provision as identified in Natural England's letter dated 6 March 2019. It is noted that recreational pressure is different to "visitor enjoyment", and Part B of Policy 87 does not address this issue. With respect to the type of mitigation required, Paragraph 17.22 identifies that development which results in the creation of new dwellings will be expected to contribute to the mitigation of recreational impacts through financial contributions as set out in the Planning Obligations Supplementary Planning Document. However, review of this SPD, the Waltham Forest Strategic Infrastructure Plan and the CIL Draft Infrastructure Projects List (January 2019) which was out for public consultation in March 2019, reveals that there are no SAMMs or SANGs measures identified within any of these documents. The City of London have prepared a list of SAMMs measures (as identified in Natural England's letter dated 6 March 2019) and it is reasonable that these should be included within any Infrastructure Plan, SPD or CIL Schedule to inform the Draft WFLP. Furthermore, any requirement to deliver mitigation should be identified in a Local Plan policy, rather than pre-amble, so that it is given weight in decision making and it is clear to developers that they are required to either propose mitigation or contribute to off-site mitigation. Most of Waltham Forest falls within the 0-3km ZoI. When aligning this with the spatial strategy identified within the Draft WFLP, it appears that the majority of strategic locations for growth in Waltham Forest all fall within the 0-3km ZoI and therefore all residential development in the borough is likely to trigger a requirement for avoidance and mitigation measures in</p>	

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			accordance with Natural England's letter dated 6 March 2019, and this should be clearly sign posted in Policy.	
2984	The City of London	Department of the Built Environment City of London	The Green Arc is referenced in The London Plan and we would expect its vision to be set out in this Local Plan. Such an explicit and integrated approach to the Borough's Green Infrastructure is fully in accord with the London Plan 's current wording about the protection of links between the Lee Valley and Epping Forest. Also, such a proactive and clear approach to green infrastructure would allow developers to respond positively. It would also allow better planning for the embedding of sustainable transport links (e.g. cycling routes, safe routes to schools, quiet ways) and other constructed infrastructure within the green infrastructure in a way that complements, or at least fits in, rather than erodes or disrupts the most valuable environmental assets.	It is proposed to review the policy to incorporate the point made.
2985	The City of London	Department of the Built Environment City of London	The clarity indicated in Policies 86.I and 88.A regarding no adverse impacts on geodiversity or the water environment sets an appropriate standard which would be welcomed for the Lee Valley and Epping Forest content.	This point is noted. It is proposed to review the policy for better clarity.
2986	The City of London	Department of the Built Environment City of London	Policy 87.D (Development Impacts) - The text within Policy 87.D needs to be altered to reflect the Boroughs role as a 'Competent authority 'under the Habitats Directive. Similarly, the text at 17.22 (page 180) needs to be reflected as part of the Policy process, with specific policy points made regarding Competent Authority status; Appropriate Assessment; Mitigation Strategy; Mitigation Tariffs to manage recreational impacts; SANG creation and declining air quality.	This point is noted for inclusion.

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Policy 88: Waterways				
ID	Full Name	Organisation	Comment	Council (Officers) Response
858	Ms Tessa Craig		We welcome that the Local Plan has a specific policy on the borough's Waterways. which form an important part of the local character of parts of the borough.	Noted. Support welcomed.
873	Alice Roberts	Campaign to Protect Rural England (CPRE)	We would be very concerned if the sites at Lea Bridge referred to were the Thames Water Depot or the Waterworks Centre, both of which are important parts of the Lea Valley Regional Park and very clearly important as MOL, central as they are to surrounding MOL. We would strongly object to either of these sites being put forward for development.	Noted. The Site Allocations document is part of a separate project to the Local Plan and as such it will be subject to a separate public consultation exercise.
947	Mr Mathew Frith		we welcome and support this.	Noted. Support welcomed.
948	Mr Mathew Frith		Para 17.25. We welcome this, but also recommend that there is a specific reference to the Thames River Basin Management Plan which development proposals should take account of. The TRBMP includes the objectives for each catchment (including those of the Lee and Roding) under the Water Framework Directive.4	Noted. Support welcomed. Thames 2021 is coordinating an informal catchment partnership in which the council along with other stakeholders are involved.
949	Mr Mathew Frith		Para 17.28. We welcome this, but also recommend that there is a specific reference to the Thames River Basin Management Plan which development proposals should take account of. The TRBMP includes the objectives for each catchment (including those of the Lee and Roding) under the Water Framework Directive.4	Noted. Support welcomed. Thames 2021 is coordinating an informal catchment partnership in which the council along with other stakeholders are involved.
1894	Mike Chrimes		I am not sure how the council can influence freight use of the Lea as the navigable lea is not in the borough	Noted. The Council is committed to encouraging modal shift towards more sustainable forms of transportation including utilisation of the River Lee Navigation.
1895	Mike Chrimes		The term Waterways should perhaps be watercourses- waterways suggest navigability	Noted. The Council will review this and update the next draft of the Local Plan.

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Policy 88: Waterways				
ID	Full Name	Organisation	Comment	Council (Officers) Response
1896	Mike Chrimes		Map of natural water courses would be useful eg Dagenham brook , and existing moorings and freight facilities on the lea	Noted. There are maps of the borough in the plan. The Environment Agency will have more detailed information and mapping for the waterways, watercourses and moorings.
2230	Lucy Read	Planning Advisor, Sustainable Places Environment Agency	Strongly recommend that the policy is renamed to Waterways, and Protecting and Enhancing River Corridors' to ensure the plan covers the protection and enhancement of the boroughs waterways and river corridors.	Noted. We will amend the Policy title to ensure the Local Plan covers the protection and enhancement of the Borough's waterways and river corridors.
2231	Lucy Read	Planning Advisor, Sustainable Places Environment Agency	Point A Policy 88 - This is incorrect- the policy should state that no deterioration of WFD waterbodies should occur and that all impacts on these waterbodies are mitigated and that environmental net benefits are achieved.	Noted. Amend the policy to read: "No deterioration of WFD waterbodies should occur and that all impacts on these waterbodies are mitigated and that environmental net benefits are achieved."
2232	Lucy Read	Planning Advisor, Sustainable Places Environment Agency	Wherever possible the draft local plan should encourage that the environment be enhanced through development promoting green infrastructure.	Noted. The Council is currently in the process of reviewing and updating its Green Belt, and Metropolitan Open Land and Green Space Studies. This will inform the next publication of the Local Plan, which will go out for consultation in Autumn 2020. It is the Council's intention to retain green space due to its high amenity value, although there may be some release in very exceptional circumstances.
2233	Lucy Read	Planning Advisor, Sustainable Places Environment Agency	'Environmental Permits are required for any activities which will take place: on or within 8m of a main river (16m if tidal) on or within 8 of a flood defence or culvert (16m if tidal) involving quarrying or excavation within 16m of a main river, flood defence or culvert in a floodplain more than 8m from the riverbank, culvert of flood defence structure and there is no planning permission.' The requirement of an 8m Buffer Zone of both sides of the main river and 5m of an ordinary watercourse should be included as a separate policy requirement within this	Noted. The Council will be conducting a Stage II SFRA on the Local Plan and Site Allocations in 2020.

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Policy 88: Waterways				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			policy. A requirement should be included in the policy to ensure development proposals investigate and secure the deculverting of waterways and restore sections of the river corridor.	

Policy 89: Food Growing and Allotments				
ID	Full Name	Organisation	Comment	Council (Officers) Response
17	Mrs Irena Souroup		I am extremely concerned about the phrase that development might be 'allowed in exceptional circumstances in Green Belt or MOL within the meaning of national policy and the London Plan'. There should be no such development whatsoever.	This comment is noted. However, the phrase referenced does not imply that development is being promoted in GB/MOL it merely restates the National Planning Policy Framework position.
950	Mr Mathew Frith		We welcome and support this.	Noted. Support welcomed.
2659	Liz Abbott	Clerk to the Directors Walthamstow and Chingford Almshouse Charity	The three allotments sites listed below, are investment lands held by the charity to generate income for the charity's charitable purposes. Hale End Allotments, Hale End Road, E17 Honeybone Allotments, Low Hall Lane E17 Trencherfield Allotments, Higham Hill Road E17 The trustee of the charity has permitted the investment land to be rented out in plots of ten or five rods for an annual rent. The provision of allotments is not a purpose of the charity, it is not a charitable activity, and may be discontinued at any time with the appropriate notices to current allotment tenants. The charity's main purpose is the provision of almshouses, to provide housing to local people in conditions of financial need, unable to house themselves within the local housing market. The charity has over many years made it known to the LBWF that the charity may wish to develop its investment land to build new almshouses. In previous years, the independent inspector/examiner appointed by the Government to review the local authority's borough plan	This comment is noted for further discussion.

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Policy 89: Food Growing and Allotments				
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			made note of the fact that the charity trustee may wish to develop the land in line with its charitable purposes. The Trustee requests that this again be recorded in the London borough of Waltham Forest's Local Area Plans.	

Chapter 18: Ensuring Climate Change Resilience				
ID	Full Name	Organisation	Comment	Council (Officers) Response
180	Anthony Thorne		The loss of trees and green spaces especially as these will soak up CO ₂ .	Noted. The proposed Biodiversity / Geodiversity Policy 86 will ensure that; An arboricultural report must be submitted at the planning application stage where a development proposal will impact on trees. Damage to trees or their loss should be avoided where possible. Where this cannot be achieved, mitigation and compensation measures should be outlined and implemented.
182	Anthony Thorne		The Council removed a 600 year mulberry tree opposite the Green Man Pub in Old Church Road E4 about a decade ago with a promise to replace it. This replacement is still awaited and had the tree been left in place it would have soaked up many tonnes of CO ₂ .	Noted.
196	Miss Anna Misterska		Yes, I think that climate resilience is critical these days. I would like to see more plans on how you will improve the air quality along A40 rather than just talk about future developments.	Noted. Air quality on the A406 will improve incrementally over time with the encouragement of new walking and cycling networks and enhanced public transport offer across the borough and a reduction on reliance on private cars. Over time emissions from private vehicles will be reduced through advances in vehicle technology and this in combination effect will improve air quality on the A406 and other main arterial roads in the borough.
179	Anthony Thorne		Increased emissions from the developments and in particular CO ₂ produced by people. This will affect air quality etc.	Noted. Air quality will improve incrementally over time with the encouragement of new walking and cycling networks and enhanced public transport offer across the borough and a

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Chapter 18: Ensuring Climate Change Resilience				
ID	Full Name	Organisation	Comment	Council (Officers) Response
				reduction on reliance on private cars. Over time emissions from private vehicles will be reduced through advances in vehicle technology and this in combination effect will improve air quality in the borough.
181	Anthony Thorne		The loss of trees and green spaces especially as these will soak up CO ₂ .	Noted. The proposed Biodiversity / Geodiversity Policy 86 will ensure that an arboricultural report must be submitted at the planning application stage where a development proposal will impact on trees. Damage to trees or their loss should be avoided where possible. Where this cannot be achieved, mitigation and compensation measures should be outlined and implemented.
286	Daf Bergin		Will all you building be eco friendly, with seedam roofs, heating systems that rely on Wind or solar power? Or are you going to cause more Emissions? I watch Grand Designs and have seen many great ideas about how not to destroy the planet during a build. I hope you will take that into consideration.	Noted. Point M of Policy 62 in the Draft Local Plan will encourage developments to: Implement design measures that increase climate change resiliency specifically in relation to surface water management, microclimate control, waste management, air and noise pollution at the design stage to ensure that more environmentally sustainable development is delivered across the borough in the future.
230	Carina Millshue		Incinerator goes against circular economy/climate ad huge contributor to air pollution	Noted. There is currently no plan to build a waste incinerator in the borough and any plan for such a project that came forward would be subject to a full public consultation.
419	Ms Ros Bedlow		Large numbers of people will need training, particularly for retrofitting existing buildings. We have many Victorian terraces in the borough, which will need solid wall insulation - external for preference as it is less disruptive. This training could be carried out at the construction college on Cathall Road - an excellent use for it.	Noted. The London Borough of Waltham Forest in partnership with the LABC has produced a guide to renovating your home which includes information on insulation: https://www.walthamforest.gov.uk/sites/default/files/Guide%20to%20renovating%20your%20home.pdf
533	Mr Peter Carey		I think that the climate emergency issue needs to be given greater priority and would suggest that it needs to be incorporated into the vision and strategic objectives in some way.	Noted. We will review this position in light of the Borough's declaration of a climate emergency.

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Chapter 18: Ensuring Climate Change Resilience				
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512	Ms Angela Rouse		There is a risk that too much of the achievement of the objective and policies relies on what will be done in new developments, which alone will not create sufficient change to ensure climate resilience and address the climate emergency that has been declared. The issue is not just one of climate emergency but also of loss of biodiversity. No mention of the London National Park City (which was supported by the borough and its councillors and was declared in July) and its implications for the borough.	Noted. The draft plan also brings forward a multitude of other measures to ensure climate resilience - for example encouraging modal shift towards more sustainable forms of transportation such as walking, cycling and enhanced public transport.
583	Mr Len Banister		Ensure that local schools have catchment area which obviate the need for children to be transported to school.	The encouragement of new walking and cycling networks and an enhanced public transport offer across the borough and a reduction on reliance on private cars. Details of this will be provided in the IDP.
964	The City of London	The Conservator's of Epping Forest	The City Corporation is aware that the Borough's Full Council declared a Climate Emergency on 26 April 2019. The City Corporation welcomes the engagement of a Borough Climate Emergency Commission and would hope that the Commission's recommendation would be integrated into the Local Plan, especially at section 18 'Ensuring Climate Change Resilience'.	Noted. We would like to thank the City of London Corporation and the Conservators of Epping Forest SAC for their support of this policy and will seek to recognise the borough's state of climate emergency into the next iteration of the plan.
951	Mr Mathew Frith		Strategic Objectives: We support this.	Noted. Support welcome for this policy.
952	Mr Mathew Frith		Paragraph 18.1: We support this.	Support noted. Thank you.
1101	Milena Petrovic	Sustainable Development Officer Thames Team Natural England	We welcome consideration of Climate Change, as outlined in Section 18 of the Local Plan. The Local Plan should, in considering climate change adaptation, also recognise the role of the natural environment to deliver measures to reduce the effects of climate change, for example tree planting to moderate heat island effects. In addition factors which may lead to exacerbate climate change (through more greenhouse	Noted. Support welcomed. We are committed to reviewing this position in light of the borough's declaration of a climate emergency and with our ongoing work with neighbouring authorities, the GLA and the Conservators of Epping Forest.

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			gases) should be avoided (e.g. pollution, habitat fragmentation, loss of biodiversity) and the natural environment's resilience to change should be protected. Green Infrastructure and resilient ecological networks play an important role in aiding climate change adaptation.	
1733	London and Quadrant L and Q	Director	L&Q note the sustainability and energy related policies (DLP policies 90, 91, 92 and 93) have been developed to align with Draft London Plan policy requirements and standards which are therefore supported in order to deliver consistency across the development plan.	Noted. Support welcomed.
1807	Robert Tatam		The second example is the isolated statement that the Council has declared an Environment and Climate Emergency, but without anything like sufficiently radical proposals to address this Emergency in the two topic areas 'Protecting and Enhancing the Environment' and 'Ensuring Climate Change Resilience', and no discernible assessment of the severe need to reduce and adapt to climate chaos on the proposals in the other ten topic areas.	Noted. Climate Change is a topic thread that Waltham Forest Council will seek to highlight and address through the next draft of the Local Plan. There are already measures woven into the plan to ensure greater climate resilience - for example encouraging modal shift towards more sustainable forms of transportation such as walking, cycling and enhanced public transport services.
1898	Mike Chrimes		Provide a map of areas vulnerable to flooding-and cross refer from elsewhere in the plan.	Noted. Maps of areas vulnerable to flooding will be included as part of the Strategic Flood Risk Assessment, which will be completed ahead of the next stage of the Local Plan.
2938	Sam Hunter Jones	ClientEarth	In April this year, the Environment Agency published its Climate Impacts Tool. Its planning scenario sees England experiencing (i) 11.7 °C increases in average summer temperatures, (ii) 75% more winter rainfall, (iii) 59% less summer rainfall, (iv) 105% higher peak river flows, (v) 1m of sea level rise, and (vi) an additional 70cm of storm surge. These are national averages with some areas expected to experience even more extreme changes. The Environment Agency has also warned that many parts of England could face "significant water deficits" by 2050 due to drier and hotter summers, and that increased flooding	Please see the attached letter dated 28 October 2019 for the Councils response to the representation made to Client Earth.

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			and coastal change threaten to have a “direct long term impact” on local economies.	
2690	Mr Peter Carey	Service Manager Air Quality & Environmental Protection London Borough of Waltham Forest	In the climate change section of the draft Local Plan there are specific policies relating to different topics and pollution sources. Indeed, 13.12 refers to poor environmental conditions including noise and points to policies 87 to 94 set out in the Climate Change Resilience chapter but there is no overarching policy here about noise, which there is with other topic areas. I am aware that other authorities often include a specific policy about noise e.g. the City of London Corporation’s 2015 Local Plan - Policy DM 15.7 covers noise and light pollution https://www.cityoflondon.gov.uk/services/environment-and-planning/planning/planning-policy/local-plan/Documents/local-plan-2015.pdf	Noted. Include overarching noise and light pollution policy - as per wording below: 1. Developers will be required to consider the impact of their developments on the noise environment and where appropriate provide a noise assessment. The layout, orientation, design and use of buildings should ensure that operational noise does not adversely affect neighbours, particularly noise-sensitive land uses such as housing, hospitals, schools and quiet open spaces. 2. Any potential noise conflict between existing activities and new development should be minimised. Where the avoidance of noise conflicts is impractical, mitigation measures such as noise attenuation and restrictions on operating hours will be implemented through appropriate planning conditions. 3. Noise and vibration from deconstruction and construction activities must be minimised and mitigation measures put in place to limit noise disturbance in the vicinity of the development. 4. Developers will be required to demonstrate that there will be no increase in background noise levels associated with new plant and equipment. 5. Internal and external lighting should be designed to reduce energy consumption, avoid spillage of light beyond where it is needed and protect the amenity of light-sensitive uses such as housing, hospitals and areas of importance for nature conservation.
2583	Peter Carey	London Borough of Waltham Forest	In the climate change section of the draft Local Plan there are specific policies relating to different topics and pollution sources. Indeed, 13.12 refers to poor environmental conditions including noise and points to policies 87 to 94 set out in the Climate Change Resilience chapter but there is no overarching policy here about noise, which there is with other topic areas. I	It is proposed to include a substantive policy on noise and pollution under Chapter 13 (Health and Well-being).

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Chapter 18: Ensuring Climate Change Resilience				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			am aware that other authorities often include a specific policy about noise e.g. the City of London Corporation's 2015 Local Plan - Policy DM 15.7 covers noise and light pollution https://www.cityoflondon.gov.uk/services/environment-and-planning/planning/planning-policy/local-plan/Documents/local-plan-2015.pdf	
2937	Sam Hunter Jones	ClientEarth	We are writing to invite you to put your area on a credible path to achieving net zero emissions by setting robust carbon reduction targets and integrating them throughout your Local Plan. This step is required by law, with the consequence that any plan that fails to demonstrate consistency with robust local targets will be unlawful and at risk of legal challenge. This step is also vital given the urgent need to reduce greenhouse gas emissions to address the climate crisis and to meet the UK's new net zero target.	Please see the attached letter dated 28 October 2019 for the Council's response to the representation made to Client Earth.

Policy 90: A Zero Carbon Borough				
ID	Full Name	Organisation	Comment	Council (Officers) Response
953	Mr Mathew Frith		We welcome and support this.	Noted. Support welcomed.
1430	Jennefer Peters	Senior Strategic Planner, London Plan Team Greater London Authority	The Mayor welcomes the borough's approach towards net zero carbon development which directly reflects the approach in the draft new London Plan Policy SI2. In addition, WF should be looking further afield for opportunities to connect to heat networks or to capitalise on growth opportunities for heat networks or similar that lie beyond the borough boundary, such as Enfield's Lea Valley Heat Network (Energetik) in accordance with draft new London Plan Policy SI3.	Noted for consideration. The Council will review this response and publish any update in the next iteration of the Local Plan due to be published for consultation in Autumn 2020.

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Policy 90: A Zero Carbon Borough				
ID	Full Name	Organisation	Comment	Council (Officers) Response
1783	Wanis Ltd	Wanis Ltd	The requirement for Carbon Offset Fund contributions needs to be balanced against other competing policy priorities that will impact the viability of the scheme, such as affordable housing.	Noted for consideration.
1784	Wanis Ltd	Wanis Ltd	On part F end with 'subject to scheme viability and other policy priorities in this Plan.'	This point is noted for consideration.
1899	Mike Chrimes		Zero Carbon borough - should include reference to local energy schemes referred to below policy 89, and the reduction of motor car use referred to elsewhere, there should be some examples provided of where this is working.	This comment is noted.
1900	Mike Chrimes		F should not be a policy objective, just recognise it may have to be accepted in extreme circumstances as it will not benefit local people affected by development. Trees planted in Amazonia will not impact people in Leytonstone	This comment is noted.
2939	Sam Hunter Jones	ClientEarth	Under the Paris Agreement 2015 the UK is committed to following a decarbonisation pathway that aims to limit the global average temperature increase to 1.5 °C, while ensuring it is held to “well below” 2 °C,5 by taking steps reflecting its “highest possible ambition”. In June, the UK passed legislation to revise the Climate Change Act target to an emissions reduction of “at least 100%” by 2050 (‘net zero’),7 in line with the advice of the Committee on Climate Change (CCC). Following the introduction of the UK’s net zero target, the Royal Town Planning Institute (RTPI) released a report stating that “nothing should be planned without having successfully demonstrated it is fit to take its place in a net-zero emissions future”. The RTPI explain that “it makes no sense, economically, socially or environmentally, for what is planned and built today to be delivered in a form, or in places, that will require costly retrofitting tomorrow.” Local authorities have a crucial role to play in ensuring that the UK meets its net zero target. A steadily growing number have declared climate emergencies and local	Please see the attached letter dated 28 October 2019 for the Council’s response to the representation made to Client Earth.

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Policy 90: A Zero Carbon Borough				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			net zero targets, with cross-party support. Consistent with law and policy, some authorities such as Greater Manchester have included their net zero targets in their emerging plans.	
2940	Sam Hunter Jones	ClientEarth	Local Plans are required by planning and environmental legislation to contribute proactively to meeting national and international climate commitments. In particular, section 19(1A) of the Planning and Compulsory Purchase Act 2004 (PCPA) requires that a local authority's development plan documents must: (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change. It is only by setting local carbon reduction targets by reference to wider national and international targets - and demonstrating proposed policies' consistency with local targets - that it is possible to establish and track an area's contribution to the mitigation of climate change (and for policies to be "designed to secure that local land use and development mitigates climate change). In this sense, section 19(1A) makes emissions reduction a central, organising principle of plan-making. In addition to section 19(1A) PCPA, the updated National Planning Policy Framework (NPPF) maintains the requirement that "the planning system should support the transition to a low carbon future in a changing climate." In particular: it should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions ... Plans should take a proactive approach to mitigating and adapting to climate change: in line with the objectives and provisions of the Climate Change Act 2008.	Please see the attached letter dated 28 October 2019 for the Council's response to the representation made to Client Earth.
2941	Sam Hunter Jones	ClientEarth	The Government emphasises the importance of local planning policy in delivering compliance with the UK's carbon budgets in its Clean Growth Strategy: Local areas are best placed to drive emission reductions through their unique position of managing	Please see the attached letter dated 28 October 2019 for the Council's response to the representation made to Client Earth.

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Policy 90: A Zero Carbon Borough				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			policy on land, buildings, water, waste and transport. They can embed low carbon measures in strategic plans across areas such as health and social care, transport, and housing. Local leaders are already rising to the challenge and putting local carbon targets and strategies in place.	
2942	Sam Hunter Jones	ClientEarth	<p>Separately, the Environmental Assessment of Plans and Programmes Regulations 2004 (which implement the Strategic Environmental Assessment (SEA) Directive) require that a development plan document's cumulative climate impacts are assessed and taken into account.¹⁵ Among other things, this includes assessing the consistency of proposed policies with all relevant climate objectives and targets.¹⁶ In addition, under section 33A of the PCPA, local planning authorities are under a duty to cooperate with other local planning authorities in preparing Local Plans where strategic matters - such as "planning measures to address climate change mitigation" ¹⁷ - have impacts across administrative boundaries. Finally, monitoring obligations require local planning authorities to report on an annual basis against any targets or indicators included in Local Plans.¹⁸ In view of these key legal and policy requirements, there is a duty on decision makers to ensure that Local Plan policies are designed to secure emissions reductions that are at least consistent with the UK's national and international commitments. Doing so requires: i. setting a local carbon target framework based on a comprehensive assessment of local carbon reduction potential, taking into account national and international climate targets; ii. demonstrating proposed planning policies' consistency with this local target framework; and iii. monitoring performance on at least an annual basis using relevant indicators. This is consistent with guidance from the RTPI and the Town and Country Planning Association (TCPA), which states that Local Plans need</p>	Please see the attached letter dated 28 October 2019 for the Council's response to the representation made to Client Earth.

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Policy 90: A Zero Carbon Borough				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			to be able to demonstrate and track how local policy contributes to meeting the target regime under the Climate Change Act.19 Following the release of the Intergovernmental Panel on Climate Change's Special Report on Global Warming of 1.5 °C,20 the TCPA reiterated this, stating that: [l]ocal government must also act now to ensure all its plans have clear carbon-reduction targets. Any plan which does not have a target is clearly in breach of the NPPF.21 These obligations in respect of emissions are in addition to the corresponding duty in respect of adaptation to climate change, which requires at a minimum that authorities plan in line with Environment Agency advice and support the delivery of national policy including the National Adaptation Programme.22	

Policy 91: Decentralised and Renewable Energy				
ID	Full Name	Organisation	Comment	Council (Officers) Response
859	Ms Tessa Craig		The River Lee Navigation can be used for heating and cooling buildings and there have been many successful projects on our networks where developments have found them more efficient than air source pumps. We consider the use of canal water for heating and cooling is consistent with the emerging London Plan policy S12 as a local energy resource.	Noted. The Plan encourages opportunities for more sustainable district and heating projects as part of the Council's commitment to being a zero-carbon borough.
1811	Robert Tatam		Policy 91 on "Decentralised and Renewable Energy" has no reference at all to the latter, that is renewable energy! Furthermore the promised Sustainability Appraisal has yet to materialise (see paragraph below).	Noted. The Council will seek to include wording on Renewable Energy in policy 91. The Sustainability Appraisal went out for consultation in October -December 2019 - we are currently working with our consultants so the next version of the Local Plan and the sustainability appraisal are delivered together.
1842	Mr John Hugill		Mention was made of de-centralised energy networksit was explained that meant not depending on the National Grid i.e.	De-centralised Energy networks are broadly energy that is generated off the main grid, including micro-renewables, heating and cooling. It can refer to energy from waste plants,

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Policy 91: Decentralised and Renewable Energy				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			self-contained power like district heating. How does that work? What is the source of power away from the National Grid?	combined heat and power, district heating and cooling, as well as geothermal, biomass or solar energy.
1901	Mike Chrimes		what is being done now to improve the situation-ie this relates to new development	The borough is carrying out a strategic flood risk assessment (SFRA). This document will help various parties consider flood risk when making planning decisions about the design and location of any development flood risk management features and structures. The SFRA will assess: risk from all sources of flooding cumulative impact that development or changing land use would have on the risk of flooding effect of climate change on risk and identify; opportunities to reduce the causes and impacts of flooding any land likely to be needed for flood risk management features and structure

Policy 92: Sustainable Design and Construction				
ID	Full Name	Organisation	Comment	Council (Officers) Response
893	Lauren Keeling	Planning Officer Essex County Council	The provisions of Policy 92 are welcome; however, the policy could be strengthened by including and setting parameters for the requirement for a Circular Economy Statement as set out in the draft London Plan. It is considered that this will support clauses I and J of Policy 92. It is noted that the draft London Plan states that further guidance is expected with regard to Circular Economy Statements and reference to this could be made in the emerging Local Plan.	Noted. We will seek to include the setting and parameters for the requirement for a circular economy statement as set out in the Draft London Plan as part of the Regulation 19 consultation subject to feasibility.
894	Lauren Keeling	Planning Officer Essex County Council	ECC note and support the commitment to partnership working with the NLWA and other North London Boroughs to meet the London Plan apportionment and recycling targets, which subsequently informed the NLWP. ECC is at an advanced stage of agreeing a Statement of Common Ground with the NLWP authorities.	Noted. The Council would like to thank ECC for their support on this strategic matter.

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Policy 92: Sustainable Design and Construction				
ID	Full Name	Organisation	Comment	Council (Officers) Response
954	Mr Mathew Frith		We welcome and support this, particularly part H.	Support noted.
1432	Jennefer Peters	Senior Strategic Planner, London Plan Team Greater London Authority	The Code for Sustainable Homes was withdrawn in 2015 and reference to it should be removed from the draft Local Plan glossary. Alternatively, the fact that it has now been withdrawn should be made clear.	Noted. We will amend the policy.
2442	Mrs Janet McArthy		Any new developments must have to conform to high quality standards with maximum eco-credentials - well insulated, energy-saving principles used throughout, and durable materials throughout to reduce the long-term carbon footprint.	Noted. Policy 92 "sustainable design and construction" will ensure that all new development in the Borough will be required to meet Home Quality Mark and Passivhaus standards.

Policy 93: Air Pollution				
ID	Full Name	Organisation	Comment	Council (Officers) Response
955	Mr Mathew Frith		We welcome and support this	Support noted. Thanks
990	The City of London	The Conservator's of Epping Forest	Air quality impacts, therefore, need to be assessed and understood in relation to the Borough's Local Plan. Authorisation for a plan or project may be given only on the condition that the competent authority is certain that the plan or project will not have lasting adverse effects on the integrity of the site concerned - i.e. where no reasonable scientific doubt remains as to the absence of such effects.	A report by King's College entitled Air Quality: Concentrations, Exposure and Attitudes in Waltham Forest in 2018 and a detailed Nitrous Oxide modelling report were produced in May 2018, and the Borough produced an air quality action plan in 2018 for the 2018-2023 period. These reports were used as evidence when drafting the 2018 draft Local Plan.
1095	Milena Petrovic	Sustainable Development Officer	The Local Plan indicates a housing delivery target of 27,000 units by 2035. Whilst the contribution of this new development to air pollution impacts on the SAC is partially dependent on the	Noted. LBWF is working closely with neighbouring boroughs and the GLA and the Conservators of the Forest through the duty to cooperate. The outcome of which will be up-to-date

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Policy 93: Air Pollution				
ID	Full Name	Organisation	Comment	Council (Officers) Response
		Thames Team Natural England	chosen spatial development strategy, without effective cross-boundary cooperation with other Boroughs, it is unlikely that a likely significant effect on the SAC can be ruled-out. This is reflected in the Habitats Regulations Assessment (HRA) of the Draft London Plan which recommends that "The London Plan should direct the London Boroughs (particularly Waltham Forest and Redbridge) to participate as necessary in the traffic and air quality strategy that is in the early stages of being devised for the SAC (Section 7.6.1), and the London Plan may therefore be amended to reflect this. As such, we hope that LBWF will consider its relationships with the current authorities involved with the Epping Forest strategic solution and be agreeable to any work on air pollution. The council should not rely on the in-combination assessments of other Local Plan HRAs, and may need to consider modelling additional roads to those used in the Epping Forest District Council and Harlow Local Plan HRAs.	habitats and regulations assessment (HRA) and Sustainability Appraisal (SA). This will include air quality modelling and is an ongoing piece of work to refine the approach.
1096	Milena Petrovic	Sustainable Development Officer Thames Team Natural England	Natural England advises that one of the main issues which should be considered in the plan and the SA/HRA are additional nitrogen emissions as a result of increased traffic generation from developments, which can damage the SAC. The effects on local roads in the vicinity of any proposed development on nearby designated nature conservation sites (including increased traffic, construction of new roads, and upgrading of existing roads), and the impacts on vulnerable sites from air quality effects on the wider road network in the area (a greater distance away from the development) can be assessed using traffic projections and the 200m distance criterion followed by local Air Quality modelling where required.	Noted. The borough's air quality in terms of NOx NO ₂ PM10 and PM2.5 has been monitored in the Air Quality: Concentrations, Exposure & Attitudes Waltham Forest Report of 2018 by Kings College. A further piece of work has been commissioned by Epping Forest District Council. A forthcoming HRA will use a bespoke fleet mix, which will allow accurate air quality modelling to be achieved for EFSAC and in the northern parts of Waltham Forest.
1097	Milena Petrovic	Sustainable Development Officer	Natural England would welcome discussion on the Habitats Regulations Assessment (HRA) of the plan, especially in relation	Noted. The Council is working in partnership with neighbouring authorities on their respective HRAs. The outcome of this will be up-to-date habitats and regulations assessment (HRA) and

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Policy 93: Air Pollution				
ID	Full Name	Organisation	Comment	Council (Officers) Response
		Thames Team Natural England	to any transport and air modelling work that may need to be undertaken to inform the HRA.	Sustainability Appraisal (SA) for Waltham Forest Council. This will include air quality modelling and is an ongoing piece of work to refine the approach.
1175	Neeru Kareer	Enfield Council	Air quality along key strategic A406 North Circular Corridor is a major concern and opportunities to improve the negative environmental impacts should be explored between the two authorities through our respective Local Plans.	The draft brings forward a multitude of other measures to improve air quality and ensure climate resilience - for example encouraging a modal shift towards more sustainable forms of transportation such as walking, cycling and enhanced public transport.
1176	Neeru Kareer	Enfield Council	Other sustainable transport measures should be explored including improving the strategic bus and cycle network with the aim of improving air quality and increasing overall choice and access to public transport that will encourage active travel. Enfield welcomes the opportunity to work together in addressing poor air quality concerns.	Noted. The draft plan also brings forward a multitude of other measures to ensure climate resilience - for example encouraging a modal shift towards more sustainable forms of transportation such as walking, cycling and enhanced public transport services.
1431	Jennefer Peters	Senior Strategic Planner, London Plan Team Greater London Authority	The plan's intention to improve air quality is supported and welcomed but it should be recognised that large-scale development proposals that are subject to an Environmental Impact Assessment should be encouraged to take an air quality positive approach in accordance with draft new London Plan Policy SI1 and not just within air quality focus areas. The Mayor supports WF's ambition to exceed the parameters of draft new London Plan Policy SI1 by requiring Air Quality Assessments for, not only major development proposals but also for a range of different development scenarios including those where there are sensitive receptors in areas of poor air quality.	Noted. Support welcomed. As part of the plan making process Waltham Forest Council will be completing an HRA. This will be sufficient assessment for the SSSI and SAC are within the borough. The borough has introduced a number of measures to tackle poor air quality in the Plan, which brings forward a multitude of other measures to ensure climate resilience - for example encouraging modal shift towards more sustainable forms of transportation such as walking, cycling and enhanced public transport services.
1927	London and Quadrant L and Q	Director	DLP Policy 93 (Air Quality) p.190 In terms of Policy 93 Air Quality and the requirement for development to be "air quality positive" in air quality focus areas, supporting guidance should be provided to explain how this can be achieved, as opposed to the requirement to be "air quality neutral" in the adopted London Plan.	Noted. The emerging London Plan uses the "air quality positive" term as opposed to "air quality neutral" so the Council has used "air quality positive" to align with the emerging London Plan, which states: "One of the keys to delivering this will be to draw existing good practice together in a holistic fashion, at an early stage in the process, to ensure that the development team can identify which options deliver the most improvement to air

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Policy 93: Air Pollution				
ID	Full Name	Organisation	Comment	Council (Officers) Response
				quality. Large schemes, subject to EIA, commonly have project and design teams representing a range of expertise, that can feed into the development of a statement to set out how air quality can be improved across the proposed area of the development."
2943	Sam Hunter Jones	ClientEarth	The national Planning Practice Guidance (PPG) refers to addressing climate change as "one of the core land use planning principles" that should "underpin both plan-making and decision-taking." The PPG also refers to the need for local planning authorities to undertake a "robust evaluation of future emissions", including consideration of "different emission resources, likely trends taking into account requirements set in national legislation, and a range of development scenarios. It also states that "sustainability appraisal should be used to test different spatial options in plans on emissions."	Please see the attached letter dated 28 October 2019 for the Council's response to the representation made to Client Earth.

Policy 94: Water				
ID	Full Name	Organisation	Comment	Council (Officers) Response
897	Lauren Keeling	Planning Officer Essex County Council	ECC wishes to highlight that the LBWF should ensure that, where development is proposed near the boundary with Essex, ECC are consulted as a secondary consultee in its such role as Lead Local Flood Authority (LLFA). It is important to note that should such proposed development draw water from an adjacent development and be drained in to watercourses in Essex, the LLFA would expect the drainage strategy to make reference to and comply with adopted ECC SuDS policy.	Noted. The Council will consult ECC as a secondary consultee in its role as Lead Local Flood Authority where development is proposed near the boundary of Essex.
1224	Thames Water Utilities Ltd	Thames Water Utilities Ltd	In light of the changes which took effect in April 2018* we would like to support Policy 94 and its supporting paragraphs (18.10 - 18.12). We would However, request that the Policy Title is amended to reflex the contents and as such be titled	Noted. We will consider including the policy name change and amended wording in the pre-submission version of the Plan.

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Policy 94: Water				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			<p>“Water and Wastewater Infrastructure”. It is considered that this will provide better clarity. In addition we would request that the following supporting paragraphs are included:</p> <p>“Developers need to consider the net increase in water and waste water demand to serve their developments and also any impact the development may have off site further down the network, if no/low water pressure and internal/external sewage flooding of property is to be avoided. Thames Water encourages developers to use their free pre-planning service https://www.thameswater.co.uk/preplanning). This service can tell developers at an early stage if there will be capacity in Thames water and/or wastewater networks to serve their development, or what they will do if there is not. The developer can then submit this communication as evidence to support a planning application and Thames can prepare to serve the new development at the point of need, helping avoid delays to housing delivery programmes. *From the 1 April 2018 all offsite water and wastewater network reinforcement works necessary as a result of new development will be delivered by the relevant statutory undertaker funded by the Infrastructure Charge which is a fixed charge for Water and wastewater for each new property connected. Strategic water and wastewater infrastructure requirements will be funded through water companies’ investment programmes which are based on a five-year cycle known as the Asset Management Plan process.</p>	
2209	Lucy Read	Planning Advisor, Sustainable Places Environment Agency	<p>Sewerage capacity is a significant issue for the borough. Liaison with Thames Water to ascertain whether there is enough capacity in the sewerage network to serve new development is recommended. New and existing development should not contribute towards water pollution.</p>	<p>Noted. We will work with Thames Water, the Environment Agency and our neighbouring boroughs to explore mitigation issues surrounding capacity caused by development.</p>

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Policy 94: Water				
ID	Full Name	Organisation	Comment	Council (Officers) Response
2221	Lucy Read	Planning Advisor, Sustainable Places Environment Agency	Policy 75 - Utilities Infrastructure - Sewerage infrastructure has not been included in this policy. A requirement that sewerage infrastructure should be included in this policy. - also refer to comment s in relation to policy 94.	Noted. We will work with Thames Water, the Environment Agency and our neighbouring boroughs to explore mitigation issues surrounding capacity caused by development.
2237	Lucy Read	Planning Advisor, Sustainable Places Environment Agency	Recommendation that the policy be renamed as; "Water Quality and Water Resources" (Inline with para 170 of the NPPF) Point A unsound and inconsistent with national policy. It is correct to be seeking mitigation measures to be put in place, these would be to prothese would be to prevent any impact in the first instance and not to alleviate it. This policy, as it stands, incorrectly suggests it is possible to allow impacts on water quality. We support point C of this policy, which aims to minimise the environmental impact of developments through management of resource consumption. We are particularly pleased to see the requirement to reduce water consumption to 105 litres per head per day or less in residential schemes, in line with the draft London Plan, and that a water efficiency standard for commercial development has been set in line with BREEAM (the BRE Environmental Assessment Method) or equivalent. We suggest the council should work in partnership with the relevant statutory and consultee organisations to protect, manage and improve the water quality of the Borough's water environment particularly the quality of water bodies which are currently failing to meet the WFD requirements. In order to achieve this, the policy should make reference to WFD waterbodies within the Borough, which have currently not been included. We also note, that improving the Borough's water quality and water resource efficiency will be dependent on water infrastructure capacity. This policy should be linked to policy75 (Utilities Infrastructure) to ensure there is	Noted. We will amend the name of the policy and work with Thames Water, the Environment Agency and our neighbouring boroughs to explore mitigation issues surrounding water capacity caused by development. Support welcomed for point C.

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Policy 94: Water				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			sufficient capacity available within the water infrastructure network to service development within the Borough. Furthermore, we note that the council should engage with infrastructure providers to ensure that sufficient capacity is available in the wider infrastructure	

Policy 95: Contaminated Land				
ID	Full Name	Organisation	Comment	Council (Officers) Response
2240	Lucy Read	Planning Advisor, Sustainable Places Environment Agency	Within part A of the policy, we note that developers are required to ensure that a site investigation and desk based research is undertaken in line within currently guidance. In addition to this, developers should be required to submit a Preliminary Risk Assessment (PRA) alongside any planning application where contaminated land is suspected. For potentially contaminated land developers should ensure that sites are suitable or made suitable for the intended use, and prevent contamination from being activated or spread during construction. This policy should also prevent developers from discharging to ground through land affected by contamination. We note that groundwater resources and the presence of several groundwater Sources Protection Zones (SPZ) have not been referenced within this policy.	Noted. We will publish amendments to the policy on the next round of consultation. This is subject to ongoing work and new evidence-based studies being commissioned.

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Policy 96: Managing Flood Risk				
ID	Full Name	Organisation	Comment	Council (Officers) Response
333	ms Louise Krzan		Policy 97 - Managing Flood Risk - what support/ information will be available for residents buying or renting new buildings that manage to get approval on flood plains, with regards to insurance. This is a cost that the individual will pay the price for and it is a serious problem nationally that people do not realise this hidden cost until it is too late. If you decide to go ahead and build on flood plains, aside the ecological issues, you need to consider this impact on individuals financially.	Noted. Appropriate flood risk strategies and mitigation measures in will be provided as part of the full planning application on developments of sites that have an identified higher flood risk.
860	Ms Tessa Craig		The River Lee Navigation can sometimes accept clean surface water drainage from adjacent developments subject to an agreement with the Trusts Utilities Team. E would therefore ask that this be included as a potential option for developments to explore.	Noted. This will be explored further with the next stage of Strategic Flood Risk Assessments.
898	Lauren Keeling	Planning Officer Essex County Council	ECC wishes to highlight that the LBWF should ensure that, where development is proposed near the boundary with Essex, ECC are consulted as a secondary consultee in its such role as Lead Local Flood Authority (LLFA). It is important to note that should such proposed development draw water from an adjacent development and be drained in to watercourses in Essex, the LLFA would expect the drainage strategy to make reference to and comply with adopted ECC SuDS policy .	Noted. The Council will consult ECC as a secondary consultee in its role as Lead Local Flood Authority where development is proposed near the boundary of Essex.
957	Mr Mathew Frith		We welcome and support this.	Noted. Support for policy welcomed.
958	Mr Mathew Frith		Para 18.15 we welcome and support this.	Noted. Support for policy welcomed.
1225	Thames Water Utilities Ltd	Thames Water Utilities Ltd	Any surface water discharge must follow the drainage hierarchy as set out in the London Plan. Where surface water drainage is proposed to the Thames Water Network then it must achieve greenfield runoff rates.	Noted. The Draft Local Plan will be subject to the next level, Level 2 Strategic Flood Risk Assessment (SFRA). This will be completed once the site allocations have been finalised.

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Policy 96: Managing Flood Risk				
ID	Full Name	Organisation	Comment	Council (Officers) Response
1902	Mike Chrimes		How is localised flooding caused by clogged drains managed? There should be a policy about this.	Noted. This is not an issue that comes under the remit of the Local Plan and as such a policy cannot be written for it. If there is a specific problem with drainage in the borough, please contact the Waltham Forest Drainage Help and Advice.
2207	Lucy Read	Planning Advisor, Sustainable Places Environment Agency	Flood risk and water related evidence base supporting the local plan has not been provided. Which means that it has not been demonstrated that the priority locations for growth are located in the areas with the lowest risk from flooding. The flood risk and water quality and resource draft policies are unjustified and not consistent with the national policy. There is No SFRA and sequential testing of sites No robust evidence base supporting the strategic local policies regarding water resources and quality. Plan lacks a policy that offers protection and enhancement to the boroughs river corridors Evidence base not up to date so therefore they find the proposed submission unsound, not justified, effective or consistent with national planning policy.	Noted. The Draft Local Plan will be subject to the next level 2 Strategic Flood Risk Assessment (SFRA). This will be completed once the site allocations have been finalised.
2241	Lucy Read	Planning Advisor, Sustainable Places Environment Agency	In its current form, we would find this policy unsound at Regulation 19 consultation as it is not consistent with national policy and is not justified by a robust or sound evidence base. Point A of this policy is incorrect and should be amended to state that 'development in high flood risk areas should be avoided'. This is supported by Paragraph 155 of the NPPF. Point B is also not in line with national guidance. Only water compatible uses and essential infrastructure development that passes the Exception Test are allowed in flood zone 3b. Point C of this policy is incorrect, and should be amended to make clear that the Sequential Test is required to be passed for all development in Flood Zones 2 and 3. The policy should set out clear criteria for the incorporation of flood resistance and resilience measures, and for ensuring adequate flood defences	Noted. Through the Council's existing level 1 SFRA and the findings of the Level 2 SFRA, the policy will be amended and aligned.

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Policy 96: Managing Flood Risk				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			<p>commensurate with the lifetime of the development (taking account of climate change). We would also recommend that climate change is explicitly mentioned within this policy. We would recommend that the following sentence is added to the policy wording: "Development proposals should include an assessment of the impact of climate change using appropriate climate change allowances over the lifetime of the development so that future flood risk is taken into account."</p> <p>The wording used within Policy 96, Part E is not clear and does not provide enough detail. Amendments should be made to the wording to strengthen this point, including guidance on what is considered as an 'appropriate on and off-site flood mitigation strategy[ies]'. Furthermore, it should be made clear the process of measuring these strategies and who will be responsible for them. We welcome the inclusion of Part H, in ensuring all developments achieve greenfield runoff rates for off-site discharge rates through the use of SuDS following the drainage hierarchy in the draft London Plan.</p>	
Policy 97: Overheating				
960	Mr Mathew Frith		We welcome and support this, particularly part C.	Support noted.

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Chapter 19: Promoting Sustainable Waste Management				
ID	Full Name	Organisation	Comment	Council (Officers) Response
9	Mr Frederick Smith		We need to reduce the burning of waste and do it out of London if possible.	Noted. For consideration.
88	Andrew Sivyer		Promote full range of recycling technologies including plastics	Comment noted
517	Mrs Claire Ford		There has been a lack of investment in the Kings Road recycling centre in Chingford. The access road has been neglected by the Council. It's a very popular, well used site and needs longer opening times and the road resurfaced.	Comment noted.

Policy 99: Waste Management				
ID	Full Name	Organisation	Comment	Council (Officers) Response
87	Andrew Sivyer		Enforce initiative for avoiding street waste	Comment noted.
170	Anthony Thorne		In light of water problems the sewage and waste water systems will also be working to capacity so again there needs to be a plan to put in place the facilities to cope with additional demands that would be placed on the infrastructure.	The Local Plan will be supported by an Infrastructure Delivery Plan, which will set out details of the borough's infrastructure requirements. This document will set out what is needed, where it is needed and when it is needed. It will also set out the delivery mechanism to ensure the timely delivery of infrastructure. This document will be published with the final version of the plan. Policy 2(c) makes clear that planning permission will only be granted for new development if it can be demonstrated that there is, or will be, sufficient infrastructure capacity to support and meet growth requirements.
334	Ms Louise Krzan		It is inherent in the first point that Waltham Forest appears to lack ambition when it comes to raising the recycling rate and reducing the amount of waste. Yes the population is set to grow	This comment is noted. Policy 99 sets out the relationship between this borough and the both the North London Waste Authority (NLWA) and the North London Waste Plan (NLWP) in

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Policy 99: Waste Management				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			but where are the measures to force our recycling rate up. This will need to happen by 2030, but there is nothing here that demonstrates the ambition required to properly deal with our waste into the future, with the start being reduction and re-use. As the borough's population grows it is expected that more waste would be generated. Waste management refers to the activities required to manage waste from its generation to its final disposal. Waste is produced by everybody in everyday life in London and in Waltham Forest. This includes individuals, households, businesses and organisations.	delivering London plan apportionment and recycling targets. It also refers to the Council's commitment to the prevention and reduction of all forms of waste and increasing recycling rates across all forms of waste.
890	Lauren Keeling	Planning Officer, Essex County Council	ECC as Waste Planning Authority has an interest to ensure that there is adequate employment land to fulfil waste needs of existing and future communities. It is important that neighbouring Local Planning Authority employment policies do not unduly restrict or limit employment land used for waste purposes.	The Council recognises the need for suitable sites/areas to meet the borough's future waste management needs and through the North London Waste Plan suitable sites/areas have been identified to meet future waste management needs. There is no presumption outside of that plan that any further employment land will be released for waste purposes.
895	Lauren Keeling	Planning Officer, Essex County Council	ECC note and support the commitment to partnership working with the NLWA and other North London Boroughs to meet the London Plan apportionment and recycling targets, which subsequently informed the NLWP. ECC is at an advanced stage of agreeing a Statement of Common Ground with the NLWP authorities.	This comment is noted, and the support welcomed.
896	Lauren Keeling	Planning Officer, Essex County Council	It is acknowledged that policy 99 is consistent with the policies set out in the NLWA. The general approach to waste management as set out in the principles contained within clauses C to E of Policy 99 are noted and supported. Where references are made in supporting text to the intended approach towards the different waste streams, these are considered to have already been agreed through previous communication between the MWPA and NLWA.	This point is noted.

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Policy 99: Waste Management				
ID	Full Name	Organisation	Comment	Council (Officers) Response
1931	Tony Thorne		The current waste management provision appears to be working at capacity and with the demands for sorting of waste etc has resulted in multiple collections and especially when it comes to trade waste which greatly increases traffic movements and I would suggest that there needs to be a more coordinated approach. Plus to help prevent fly tipping there needs to be more local resources so that residents do not have to travel to the other end of the Borough to dispose of waste.	This comment is noted for further consideration. The issues raised lie outside the Local Plan but within the North London Waste Authority (NLWA) and are discussed more in more detail in the North London Waste Plan (NLWP), which is currently at examination.

Chapter 20: Delivering the Plan				
ID	Full Name	Organisation	Comment	Council (Officers) Response
335	Ms Louise Krzan		Policy 102- Monitoring and promoting the achievement of growth targets - Given you have declared a Climate Emergency and this should be embedded across all areas be that housing or otherwise, can we have an evaluation indicator that specifically helps track whether we are meeting goals in this area?	Noted for consideration.
418	Mr David Matson		According to recently released documentation related to the Area Investment Plans, "The draft Local Plan will supersede" (the current adopted planning documents). It is unclear at what point will this happen. Will it be before the process of consultation, consideration by the Inspector in public, and Council adoption is complete? Early adoption would not satisfy the public's interest in the consultation process.	The draft Local Plan is intended to replace the suite of currently adopted planning documents. Following the Regulation 18 Consultation in September 2019, the Council has a duty to produce a consultation report, outline and responding to all of the comments received during the consultation. The Council will then proceed with developing its Regulation Proposed Submission version of the plan which will also be published for statutory six-week consultation - this will ultimately be the final opportunity for stakeholders and residents to engage with the plan before it is submitted to the Secretary of State for independent examination. All supporting evidence that has been used to develop the plan, alongside consultation reports, will also be submitted to the Inspector. The Secretary of State

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Chapter 20: Delivering the Plan				
ID	Full Name	Organisation	Comment	Council (Officers) Response
				will then appoint an Independent Person (Planning Inspector) to examine the Local Plan. The Local Plan will then be examined, and the inspector's report will be sent to Waltham Forest Council. Subject to successful examination, including any suggested minor amendments the inspector may require, the Council will formally adopt the new Local Plan.
457	Mrs Krysia Sivyer		I may have missed this as this is a very long document, but obviously supporting services need to be included in the plan, e.g. more health centres/medical services, schools etc. Also, new homes should be a mix of residences not just blocks of flats. Family homes should be built too. North Chingford is very much a family area and would particularly benefit from houses, not just flats. Much of this plan is very idealistic. It would be hard to disagree with the sentiments. I just hope it's not a lot of fine words, but is fulfilled.	The Local Plan will be supported by an Infrastructure Delivery Plan (IDP). The IDP will detail the infrastructure needs arising from the growth set out in the Local Plan, including but not limited to the provision of medical facilities, schools and community facilities.
796	LVRPA	Lee Valley Regional Park Authority	Section 20 of the Local Plan - 'Delivering the Local Plan' should include a statement supporting partnership working to ensure funding and delivery of these 'access projects' and setting out the role of the Borough in facilitating this process, including through developer contributions where appropriate.	Section 20, para 20.5, highlights the place-shaping role the Council has to play in delivering the aspirations of the Local Plan. Working in a positive spirit of partnership with landowners and developers and other private sector organisations, to secure deliverable development proposals and investments is highlighted.
2276	Phoebe Juggins	Department for Education	One of the tests of soundness is that a Local Plan is 'effective', meaning the plan should be deliverable over its period. In this context and with specific regard to planning for schools, there is a need to ensure that education contributions made by developers are sufficient to deliver the additional school places required to meet the increase in demand generated by new developments. DfE notes that LBWF have produced a Planning Obligations SPD and set the broad principles out at Policy 100, to reflect Local Plan review priorities, and that the Council has an adopted CIL Charging Schedule in place. The Council should set out education infrastructure requirements for the plan	The Local Plan will be supported by an Infrastructure Delivery Plan (IDP). The IDP will detail the infrastructure needs arising from the growth set out in the Local Plan, including but not limited to the provision of school places. An Infrastructure Funding Statement (IFS), as required by the CIL Regulations 2010 (as Amended) will be produced by the Council annually to update residents and stakeholders on the implementation of the IDP and any factors that have influenced the scope, scale or timing of each respective infrastructure requirement. The IFS will also set out the infrastructure projects that the Council intends to fund either wholly or partially, by the Community

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Chapter 20: Delivering the Plan				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			<p>period within an Infrastructure Funding Statement. Where additional need for school places will be generated by housing growth, the statement should identify the anticipated CIL and Section 106 funding towards this infrastructure. The statement should be reviewed annually to report on the amount of funding received via developer contributions and how it has been used, providing transparency to all stakeholders. Local authorities have sometimes experienced challenges in funding schools via Section 106 planning obligations due to limitations on the pooling of developer contributions for the same item or type of infrastructure. However, the revised CIL Regulations remove this constraint, allowing unlimited pooling of developer contributions from planning obligations and the use of both Section 106 funding and CIL for the same item of infrastructure. The advantage of using Section 106 relative to CIL for funding schools is that it is clear and transparent to all stakeholders what value of contribution is being allocated by which development to which schools, thereby increasing certainty that developer contributions will be used to fund the new school places that are needed. DfE supports the use of planning obligations to secure developer contributions for education wherever there is a need to mitigate the direct impacts of development, consistent with Regulation 122 of the CIL Regulations. We also request a reference within the Local Plan's policies or supporting text to explain that developer contributions may be secured retrospectively, when it has been necessary to forward fund infrastructure projects in advance of anticipated housing growth. An example of this would be the local authority's expansion of a secondary school to ensure that places are available in time to support development coming forward. This helps to demonstrate that the plan is positively prepared and deliverable over its period. DfE would be</p>	<p>Infrastructure Levy (CIL) or planning obligations in the form of S106, though this will not dictate how funds must be spent and in turn collected. The method/process for the collection of the Community Infrastructure Levy will continue to be set out in Waltham Forest Councils Adopted CIL Charging Schedule. The Council's approach to planning obligations via Section 106 will be set out in the Council's Adopted Developer Contributions Supplementary Planning Document (SPD). The Council acknowledges that regulations relating to the use of both CIL and S106 have, on occasion, created challenges in terms of delivering key pieces of infrastructure, particularly with regard to pooling restrictions in relation to Section 106 agreements, alongside stipulations that CIL and S106 cannot be used to fund the same infrastructure project. The Council therefore welcomes the amendments to the CIL Regulations in September 2019, confirming that pooling restrictions have now been removed and that CIL and S106 can now be used to fund the same infrastructure project. DfE will be included for future consultation on Local Plan, IDP and any subsequent Infrastructure Funding Statement (IFS).</p>

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Chapter 20: Delivering the Plan				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			particularly interested in responding to any update to the Infrastructure Delivery Plan/Infrastructure Funding Statement, viability assessment or other evidence relevant to education which may be used to inform local planning policies and CIL charging schedules. As such, please add DfE to the database for future consultations on relevant plans and proposals.	

Policy 100: Infrastructure and Developer Contributions				
ID	Full Name	Organisation	Comment	Council (Officers) Response
1228	Thames Water Utilities Ltd	Thames Water Utilities Ltd	It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development.	Comment noted. The Council will engage with Thames Water on these matters in preparation of the Local Plan and supporting Infrastructure Delivery Plan (IDP).

Policy 101: Monitoring and promoting the achievement of growth targets				
ID	Full Name	Organisation	Comment	Council (Officers) Response
1530	Ms Mary Manuel		This policy sets out the key indicators that would trigger a full or partial review. Given the strategic objectives and other policies recognise the importance of infrastructure being delivered alongside growth and require its provision the inclusion of an additional key indicator should be included and can be justified.	Noted for consideration.

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Policy 101: Monitoring and promoting the achievement of growth targets				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			A failure to deliver the social infrastructure required to support the delivery of the plan (identified in the IDP)	
1571	Mr Tim Madelin	Associate Director of Estates (Strategic) NHS North East London Commissioning Alliance	This policy sets out the key indicators that would trigger a full or partial review. Given the strategic objectives and other policies recognise the importance of infrastructure being delivered alongside growth and require its provision the inclusion of an additional key indicator should be included and can be justified. A failure to deliver the social infrastructure required to support the delivery of the plan (identified in the IDP).	Noted for consideration.

Policies Map Changes				
ID	Full Name	Organisation	Comment	Council (Officers) Response
1433	Jennefer Peters	Senior Strategic Planner, London Plan Team Greater London Authority	How and why some areas have been identified as 'proposed to be removed' is unclear and images are not cross referenced within the body of the text and vice versa.	This comment is noted. An updated map will be produced to accompany the next stage of the Local Plan.
1361	Jennefer Peters	Senior Strategic Planner, London Plan Team Greater London Authority	The proposed amendments to the Policies Map show some boundary changes to areas currently designated as BEA or SIL. The implications for the loss of industrial capacity in these areas should be identified and taken into account when planning for how the borough would meet identified industrial need.	Noted for consideration. Retained BEA and SIL sites form an important part of the spatial strategy and sites that can viably deliver BEA and SIL uses will be retained in as part of the site allocations work.
2068	Stonecrest Marble Ltd	Stonecrest Marble Ltd	As detailed throughout this representation, the proposed changes to the Policies Map do not go far enough in that they do not allocate specific sites for development, nor does it	There are no site allocations in the Local Plan. We will be consulting on a Site Allocations document alongside the Local Plan in 2020.

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Policies Map Changes				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			identify suitable sites for release from the Green Belt. This is in spite of the Council's existing evidence base confirming a requirement for 52,000sqm of employment floorspace, as well as confirming that there are suitable sites which could be released from the Green Belt to meet the Council's growth targets.	
2005	Mr Paul O'Neil	Associate Director Metropolis PDG Ltd	The Policies Map does not accurately reflect the flood zones in the vicinity of the site. Consultants acting on behalf of my client have been liaising with the Environment Agency to clarify the zoning of the site. We can confirm that it does not lie within flood Zone 3b as currently shown on the amendment to the flood risk map shown in the Appendices to the Plan.	Noted. The Strategic Flood Risk Assessment Part 1 has been completed and will shortly be uploaded onto Waltham Forest Council's website. Part 2 was started in spring 2020 to coincide with the regulation 19 publication and consultation of the Local Plan.
2006	Mr Paul O'Neil	Associate Director Metropolis PDG Ltd	The Policy map should be amended to remove the designation of 'playing pitch' and 'open space' in respect of the former stadium.	Noted for consideration.
2269		St William Homes LLP	Part 1 Policies Map Changes Figure 1.11 seeks the removal of the residual SIL allocation from the Gasworks site. This is supported for the following reasons: London Plan 2019 Policy E5 Strategic Industrial Locations (SIL) requires Boroughs to take into account the potential to rationalise SILs. In particular Boroughs should rationalise areas of SIL that are currently in non-industrial and related uses or contain transport or utilities uses which are surplus to requirements. This land is a former utilities use which is surplus to requirements.	This point is noted. The Council is preparing an additional Local Plan document on site specific allocations. This will provide opportunity to apply the policies of the plan on specific sites, providing more details on how new developments could be integrated within existing local areas. This document will focus on identified 'Areas of Change and Opportunity'. This document will be prepared with public participation providing the opportunity for resident views to shape the nature and form of development likely to be considered acceptable.

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Evidence Base				
ID	Full Name	Organisation	Comment	Council (Officers) Response
426	Mr P Heatherley		I have not been able to find these documents until stumbling across them today - without sufficient time to study them before the close of this consultation. For example, a search for "Characterisation and Intensification" on the LBWF web-site yields no results!	This document can be found in the Planning Policy evidence base section of Waltham Forest Council's website at : https://www.walthamforest.gov.uk/sites/default/files/LBWF%20Character%20and%20Intensification%20Study%2C%202019.pdf
482	Mrs Sarah Sanders	Committee Member DADRA	Key documents have not been provided as promised within the consultation period. This invalidates the consultation procedure as all parties have not had access to the relevant data. Of interest to the committee were the Characterisation and Intensification Study (promised in July and still not available searching the website on 30 September). The timing of other key documents still in progress also mean that the local community do not have access to all the detail required. Other documents referenced within the forward are very out of date, having last been updated in 2012. These do not seem to be relevant foundations from which to consider the future of our borough as we look towards 2030/2035.	This comment is noted, and the Planning Policy evidence base section of Waltham Forest Council's website is updated as final version documents are received.
1071	Mr Tim Brennan	Historic England	Expect to see the explicit identification of evidence from the Historic Environment Record and its application in the draft as per para 187 of the NPPF.	This comment is noted for further consideration.
1072	Mr Tim Brennan	Historic England	We also note the lack of references in the draft Plan to the existing characterisation study for the Borough - while the Character and Intensification Study would appear to provide a useful mechanism for assessing future change across the plan period, we would suggest that despite its age the 2010 characterisation study continues to offer helpful method of assessing local character and its potential for accommodating further change. This would help in reflecting policy HC1 of the draft London Plan.	Noted for consideration. The Council is updating the characterisation studies as part of a separate stream of work. We will assess this and include any changes necessary in the next publication of the Local Plan.
1337	Jennefer Peters	Senior Strategic Planner, London Plan	The up to date evidence referred to in the draft document should be published along with the next consultation and should inform the emerging policies. These include the Employment Land Review 2019 mentioned at Paragraph 9.6,	Noted. The evidence base documents are complete and will be published on the Waltham Forest website shortly.

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Evidence Base				
ID	Full Name	Organisation	Comment	Council (Officers) Response
		Team Greater London Authority	the Green Belt Review mentioned at Paragraph 17.6 and the Gypsy and Traveller Needs Assessment mentioned at Paragraph 8.28. The GLA is happy to work with WF so that emerging local evidence and London Plan Policies set out the parameters for Local Plan making, especially on strategic matters like the management of the borough's industrial land, over the plan period.	
1999	Mr Paul O'Neil	Associate Director Metropolis PDG Ltd	We understand that the Play Pitch Strategy is no longer being undertaken by '4G' as referred to in the Appendices to the plan. This should be corrected and an update issued.	Noted. We will amend the plan accordingly with the updated details.
2069	Stonecrest Marble Ltd Stonecrest Marble Ltd	Stonecrest Marble Ltd	It is noted through the Draft Local Plan that the Borough is looking to update its Local Plan Evidence Base, and in particular review its Green Belt Boundaries. As part of the emerging Local Plan process, the Council undertook a review of the Green Belt and Metropolitan Open Land in December 2015. This report has yet to be released to the public but was obtained via a FOI request to Waltham Forest. Our client's site was reviewed as site GB32. The review assessed the site against the five purposes of the Green Belt, ultimately concluding that the site could be considered for removal from the Green Belt. The review scores each of purpose out of 4, giving a total available score of 20. Parcel GB32 scores 9 out of 20, and is identified within the review as being a 'low performing Green Belt parcel' and is described as: "parcels generally perform poorly against all Green Belt purposes, apart from Purpose 2, which considers the role of Green Belt in preventing merging. Significantly parcels Gb31 and GB32 were not considered to be 'countryside' as they are significantly influenced by urban land uses (and in the case of GB32, the land itself has been urbanised)." In particular, the report confirmed that its removal, "would result in only limited harm to the remainder of the Green Belt by virtue of the fact that development in these locations would	This point is noted. The Council contains a commitment to work proactively with applicants to jointly find solutions which mean that proposals can be approved wherever possible without delay (See Policy 1).

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Evidence Base				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			effectively be 'infill' and would be well contained by the landscape." We would request that we work alongside the Local Authority in future updates of this document in order to assist the Local Authority with its evidence gathering with regards future development of this site.	
2410	Mr Roger Brown	Chair, Love North Chingford	Using Relevant and Up to date evidence. We were unimpressed by plan evidence. The Character and Intensification Study is a desk based justification for intensification, and has no model that works in our unique situation, and does not replace a proper character survey or design guidance which we have long called for. The Town Centres and Retail Study for this area is undermined by old/missing data. In particular the much quoted low vacancy rates are untrue. I showed you our recent mapping (in blue) the additional vacant sites over the red study data (attached). You notice that both on the map and in the data the Budgens site (vacant for over 2 years) is marked as occupied and functioning! It does However, support development of a mid-sized supermarket to counteract the drawdown of Tesco at Highams Park.	Noted for consideration. We will consider additional evidence as it arises and include any amendments in the next publication of the Local Plan, which is due to go out for consultation in Autumn 2020.

Monitoring Indicators and Targets				
ID	Full Name	Organisation	Comment	Council (Officers) Response
805	Ms Tessa Craig		Policy 8, Building Decent Homes for Everyone and Policy 9; Building a Resilient Economy should refer to chapters 13,14 and 15. The graphic identifying the key principles of a "Healthy Home" does not specifically refer to active travel and access to green / blue space except under the umbrella of "is designed to be health promoting".	This point is noted for consideration.
962	Mr Mathew Frith		Table 3.11: The two listed measure are specific to two policy areas; they will not measure the impacts on the natural environment. We recommend that three additional measures	This point is noted for consideration.

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Monitoring Indicators and Targets				
ID	Full Name	Organisation	Comment	Council (Officers) Response
			are added: - A commitment to securing biodiversity net gain (BNG - see comments for Policy 86) and measured as 'units of BNG secured against biodiversity units lost' (using the Defra metric). - The total area of SINCs (change in area) - The % of SINCs in positive management (for biodiversity) and in favourable condition.	
1089	Mr Tim Brennan	Historic England	It should be noted that the draft London Plan policy M1 (monitoring) contains a new KPI related to heritage. This is intended to monitor whether the applications that the GLA are consulted on have a beneficial, neutral or harmful impact on the historic environment - we would commend this approach to the Council in developing the monitoring framework.	This point is noted for consideration as part of the monitoring framework. The annual publication of an Authority Monitoring Report (AMR) is a statutory requirement for all local authorities. The purpose of the AMR is to provide an annual performance on the implementation of policies in the Local Plan. It is proposed to take this point forward through the AMR.
1531	Ms Mary Manuel		Policy 55 Social and Community Infrastructure - proposed change in floorspace of social and community infrastructure. This indicator does not reflect the quality of the floor space nor whether it is adequate for the community. We suggest this is reviewed and the % of social /community infrastructure fit for modern use/ improved/ or new and improved floorspace considered.	This is noted for consideration.
1572	Mr Tim Madelin	Associate Director of Estates (Strategic) NHS North East London Commissioning Alliance	Policy 55 Social and Community Infrastructure - proposed change in floorspace of social and community infrastructure. This indicator does not reflect the quality of the floor space nor whether it is adequate for the community. We suggest this is reviewed and the % of social /community infrastructure fit for modern use/ improved/ or new and improved floorspace considered.	This is noted for consideration.
1573	Mr Tim Madelin	Associate Director of Estates (Strategic) NHS North	Policy 58 Promoting Health Communities - proposed life expectancy and IMD. We suggest that years of healthy life and health inequalities are considered as alternative/additional indicators.	This is noted for consideration.

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Monitoring Indicators and Targets				
ID	Full Name	Organisation	Comment	Council (Officers) Response
		East London Commissioning Alliance		
1574	Mr Tim Madelin	Associate Director of Estates (Strategic) NHS North East London Commissioning Alliance	Policy 59 High Quality Environment refers to health inequalities and the level of health inequalities within the borough should be considered as an indicator if not used for Policy 58.	This is noted for consideration.
1863	Mike Chrimes		There needs to be an associated document which shows how success will be measured in using the plan and how successful the previous plan is regarded.	Noted. The council will continually monitor delivery of the Local Plan against established monitoring criteria.
2921	Ms Mary Manuel		Policy 58 Promoting Health Communities - proposed life expectancy and IMD. We suggest that years of healthy life and health inequalities are considered as alternative/additional indicators.	This is noted for consideration.
2922	Ms Mary Manuel		Policy 59 High Quality Environment refers to health inequalities and the level of health inequalities within the borough should be considered as an indicator if not used for Policy 58.	This is noted for consideration.
2923	Mr Tim Madelin	Associate Director of Estates (Strategic) NHS North East London Commissioning Alliance	Policy 58 Promoting Health Communities - proposed life expectancy and IMD. We suggest that years of healthy life and health inequalities are considered as alternative/additional indicators. Policy 59 High Quality Environment refers to health inequalities and the level of health inequalities within the borough should be considered as an indicator if not used for Policy 58.	This is noted for consideration.

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Glossary				
ID	Full Name	Organisation	Comment	Council (Officers) Response
807	LVRPA	Lee Valley Regional Park Authority	Lee Valley Regional Park Development Framework - a suite of documents setting out the Lee Valley Regional Park Authority's plan of proposals for the development and use of the Regional Park including the Vision, Aims Principles document, Area Proposals, Landscape Strategy, and Park Development Framework Strategic Policies	The Council notes the proposals contained in the Lee Valley Regional Park Development. Policy 87 purposely references the Lee Valley Regional Park Authority and acknowledges the role of the Lee Valley Regional Park Development Framework Development.
1434	Jennefer Peters	Senior Strategic Planner, London Plan Team Greater London Authority	The glossary should include the Mayor's preferred genuinely affordable housing products for London as set out in his Affordable Homes Programme 2016-21.	Noted for consideration. The Council will amend the glossary in line with the GLA definition of housing affordability.
2096	Mr Matthew Fletcher	Metropolitan Police Service	The reason for the request to remove "practices and principles" is that historically it has been problematic as to the understanding and application of this and has led to projects conducting their own interpretation. This in turn has resulted in higher levels of crime for newer developments than if advice had been followed from our unit. If this wording is still required, then it would be requested that a definition of practices and principles is included to remove the opportunity for misunderstanding how this is implemented. Practices and Principles of SBD is recognised as achieving certification by the Metropolitan Police Service due to its approach of considering the whole site and its specific needs. The addition of CTSAs, TMU and BTP consultation is to ensure that experts in these specific areas are consulted at the earliest opportunity to ensure appropriate, cost-effective and proportionate measures are introduced to protect users of the spaces.	Noted. The Council will consider altering the wording and publish any update in the next draft of the Local Plan, which will be consulted on in Autumn 2020.