

01. Part One

Part 1 General Comments

Reference	Name	Organisation name/Client	Para start	end	Page no.
Object 76 /1150	Anthony Hollingsworth	Greater London Authority	1.23		6

Comment

The Mayor will support both the Lee Valley development corridor and the Thames Gateway area.

Waltham Forest council response

Accepted.

Change document?

Amend text to include reference to Lee Valley corridor.

Part 1 General Comments

Reference	Name	Organisation name/Client	Para start	end	Page no.
Object 76 /1151	Anthony Hollingsworth	Greater London Authority	1.36		11

Comment

The Council should take into account all of the Mayor's published strategies where relevant to the aims and objectives of the plan. Many of these are at draft stage and some will have progressed to final adopted stage prior to the second deposit of the Plan.

Waltham Forest council response

Accepted.

Change document?

Amend text to refer to the nine Mayoral strategies air quality, biodiversity, culture, economic development, energy, noise, transport, spatial development and waste.

Part 1 General Comments

Reference	Name	Organisation name/Client	Para start	end	Page no.
Object 76 /1152	Anthony Hollingsworth	Greater London Authority	1.38		11

Comment

The draft London Plan (SDS) will be available for public consultation in late Spring 2002

Waltham Forest council response

Draft London Plan was issued on 21st June, 2002.

Change document?

Text to be updated accordingly.

Part 1 General Comments

Reference	Name	Organisation name/Client	Para start	end	Page no.
76 /1153	Anthony Hollingsworth	Greater London Authority	1.39		11

Comment

Reference to the Mayor's powers and UDP conformity with the London Plan (SDS) is welcomed. Reference should also be made to the Mayor's powers concerning the referral of planning applications of a strategic nature.

Waltham Forest council response

Accepted.

Change document?

To amend text to point out that London Planning Authorities have to refer applications of strategic importance to the Mayor which he has the power to direct refusal. The types of application that are referable are specified in the Town and Country Planning (Mayor of London) Order 2000.

Part 1 General Comments

Reference	Name	Organisation name/Client	Para start	end	Page no.
68 /1165	Anna Bloomfield	General Aviation Awareness Council			

Comment

Part One fails to take on board the advice in PPG 13 at para. 5.35 which encompasses helicopter activity - positive support to such facilities should be given in the Plan.

Waltham Forest council response

Not accepted. There are unlikely to be any opportunities for helipad development in Waltham Forest, given the densely built up nature of much of the borough, together with ecology and nature conservation considerations pertaining to its areas of open space in the Lea Valley and Epping Forest.

Change document?

None.

Part 1 General Comments

Reference	Name	Organisation name/Client	Para start	end	Page no.
56 /1184	Jolande Bowater	Barton Willmore Planning Partnership Fairview New Homes Limited			

Comment

Plan is poorly written and lacks clarity - contains unnecessary detail and complicated cross-referencing.

Waltham Forest council response

Accepted.

Change document?

Second Deposit version of the UDP is to be edited so as to remove national, regional & London-wide planning policy guidance already available elsewhere - the objective being to publish this as supplementary planning guidance when the revised Plan is formally adopted.

Part 1 General Comments

Reference	Name	Organisation name/Client	Para start	end	Page no.
Object	Chris	Barton Willmore Planning Partnership			
71 /1190	Brett	The Berkeley Group			

Comment

Plan is poorly written and lacks clarity - contains unnecessary detail and complicated cross-referencing.

Waltham Forest council response

Accepted.

Change document?

Second Deposit version of the UDP is to be edited so as to remove national, regional & London-wide planning policy guidance already available elsewhere - the objective being to publish this as supplementary planning guidance when the revised Plan is formally adopted.

Part 1 General Comments

Reference	Name	Organisation name/Client	Para start	end	Page no.
Object	Ken	Government Office for London	1.9		2
34 /1174	Bean				

Comment

Council should quote latest ONS and DETR (1996-based) population and household projection figures here - and have regard to the emerging Spatial Development Strategy for London.

Waltham Forest council response

Accepted.

Change document?

Figures quoted in paragraph 1.9 (and 3.3) to be revised accordingly.

Part 1 General Comments

Reference	Name	Organisation name/Client	Para start	end	Page no.
Object	Robert J	N/A	1.44		13
87 /1194	Gay				

Comment

There is no reference to lesbians or gay men as a minority group which should be considered by the Council's planning policies.

Waltham Forest council response

This is not an area where the Local Planning Authority has a remit.

Change document?

None.

Part 1 General Comments

Reference	Name	Organisation name/Client	Para start	end	Page no.
Object	Jonathan	London Borough of Newham	1.53		15
14 /1169	Taylor				

Comment

Reference should be included to joint working between the boroughs on a framework Plan for the Development of the Stratford Rail Lands - which would be adopted as supplementary planning guidance in due course.

Waltham Forest council response

Accepted.

Change document?

Reference to the framework plan to be included.

Part 1 General Comments

Reference	Name	Organisation name/Client	Para start	end	Page no.
Object	Katy		1.61		17
47 /1176	Andrews				

Comment

This part of the 1996 UDP referred to a land use plan for Leyton - where is this?

Waltham Forest council response

At the time of drafting of the First Review, no plan for Leyton has been formally adopted by the Council. Work on the development of area fora for the borough is likely to proceed and have implications for any such work - together with the drafting of a Community Strategy for the borough.

Change document?

None.

SP 01 The Environment

Reference	Name	Organisation name/Client	Para start	end	Page no.
Support	Mark	London Tourist Board			
99 /1147	Balaam				

Comment

Agree with SP 1 - 3, 5 - 10 and 13 - 18 and particularly welcome paragraphs 1.17 - 1.18 re sustainability; need to be aware of other developments (paras. 1.13, 1.23 - 1.24) and the borough's role in the London context (para. 1.40).

Waltham Forest council response

Change document?

SP 01 The Environment

Reference	Name	Organisation name/Client	Para start	end	Page no.
Support	Claire	Lee Valley Regional Park Authority			17
63 /1166	Martin				

Comment

Reference now included to promoting Borough biodiversity.

Waltham Forest council response

Change document?

SP 1A Urban Design

Reference	Name	Organisation name/Client	Para start	end	Page no.
86 /1142	Robert J Gay	Bushwood Area Residents Association	1.66		18

Comment

Oppose proposals for car-free developments in town centres - as infringes on personal freedom, will lead to parking elsewhere in nearby streets and will be difficult to enforce; and for maximum parking standards - these should be minimum standards and the Council should realise that people still need cars for travel to work and other journeys in outer London. Public transport should be dramatically improved to offer a real alternative to car use.

Waltham Forest council response

Car free developments are only likely to be introduced slowly in Waltham Forest - they will not be imposed and introduced only in association with controlled parking zone designations. The introduction of parking standard maxima reflects national guidance in PPG13.

Change document?

None.

SP 1A Urban Design

Reference	Name	Organisation name/Client	Para start	end	Page no.
92 /1144	Valerie Owen	London First			18

Comment

Fully endorse commitment to urban design and regeneration.

Waltham Forest council response

Change document?

SP 1A Urban Design

Reference	Name	Organisation name/Client	Para start	end	Page no.
76 /1154	Anthony Hollingsworth	Greater London Authority			18

Comment

This policy is welcomed, but should be clearer on what is meant by urban structure and urban clarity. Reference to biodiversity should also be included.

Waltham Forest council response

Accepted.

Change document?

Amend text to give examples of structure and clarity (e.g. spaces enclosed by streets and blocks, the creation of clear entrances and vistas, building lines, clear and legible routes and landmarks) this could also be treated in the glossary of terms in the plan for a full explanation of this terminology.

Amend text to read '..., public art, wildlife habitat, architectural quality and sustainability.'

Part 1 General Comments

Reference	Name	Organisation name/Client	Para start	end	Page no.
Object 76 /1156	Anthony Hollingsworth	Greater London Authority	1.66		18

Comment

Reference to Biodiversity should be added.

Waltham Forest council response

Accepted.

Change document?

Reference to Biodiversity should be added - add in wording in bold at end of first part of paragraph 1.66:

....development is of a high standard. Wildlife habitat can be retained, enhanced and created through appropriate design, not only of open spaces, but also of built structures. As part of its general commitment.....

SP01A Urban Design

Reference	Name	Organisation name/Client	Para start	end	Page no.
Support 63 /1167	Claire Martin	Lee Valley Regional Park Authority			18

Comment

Supports new policy on urban design principles.

Waltham Forest council response

Change document?

SP 01A - Urban Design

Reference	Name	Organisation name/Client	Para start	end	Page no.
Object 47 /1177	Katy Andrews		1.66 (3)		18

Comment

Should specify what is meant by "other transport improvements".

Waltham Forest council response

Accepted.

Change document?

Will amend text to include reference to walking & cycling.

SP 01A Urban Design

Reference	Name	Organisation name/Client	Para start	end	Page no.
Object 48 /1181	Richard Coburn	RAILTRACK Plc	1.66		18

Comment

Request clarification re what Council understands as "larger developments" requiring transport assessments.

Waltham Forest council response

All developments adjudged by the Council to have significant traffic generation impact (as per paragraphs 23 - 25 of PPG 13) will be requested to submit transport assessments.

Change document?

None.

SP 01A Urban Design

Reference	Name	Organisation name/Client	Para start	end	Page no.
Object 79 /1191	Alastair Crowdy	Cushman & Wakefield Healey & Baker Tesco Stores Ltd			18

Comment

The policy goes beyond the advice in PPG 4 (paragraph 13) - whereby permission is to be granted unless it would cause harm to interest of demonstrable importance - in that it expects new development to make a positive contribution to the environment.

Waltham Forest council response

Not accepted - the policy sets out the general context for the detailed policies on the built environment in Part Two of the Plan. It attempts to set out the general design criteria which will guide the Council when considering new development proposals. This leads on from the first principles set out in Annex A of PPG 1 and is intended to emphasise the Council's commitment to improved urban design in this first review of its UDP.

Change document?

None.

Part 1 General Comments

Reference	Name	Organisation name/Client	Para start	end	Page no.
Object 76 /1157	Anthony Hollingsworth	Greater London Authority	1.69		20

Comment

The reference to TSP14 appears erroneous

Waltham Forest council response

Accepted.

Change document?

Reference to change from TSP 14 to TSP15.

Part 1 General Comments

Reference	Name	Organisation name/Client	Para start	end	Page no.
45 /1173	Savage	New Lammas Lands Defence Committee	1.69		20

Comment

As worded, paragraph gives impression Waltham Forest supported construction of the M11 Link Road.

Waltham Forest council response

Accepted.

Change document?

Remove words inserted in bold text in First Deposit version of the UDP which read:

...or with the construction of the M11 Link Road.

SP 05 Transport Cyclists Pedestrians & Public Transport

Reference	Name	Organisation name/Client	Para start	end	Page no.
Object	Katy		1.69		20
47 /1178	Andrews				

Comment

As worded, paragraph gives impression Waltham Forest supported construction of the M11 Link Road.

Waltham Forest council response

Accepted.

Change document?

Remove words inserted in bold text in First Deposit version of the UDP which read:

...or with the construction of the M11 Link Road.

SP 06 Employment Retention

Reference	Name	Organisation name/Client	Para start	end	Page no.
Object	Alastair	Cushman & Wakefield Healey & Baker			20
79 /1192	Crowdy	Tesco Stores Ltd			

Comment

Regeneration objectives can be met by encouraging other uses in employment areas to act as a catalyst for jobs, infrastructure and other employment uses - e.g. foodstores.

Waltham Forest council response

The policy does not presume that uses other than B1 - B8 activities will never be acceptable on its designated employment sites. It does attempt - within the context set by the other policies in the Plan - to emphasise the attempts being made by the Council to secure economic regeneration within the borough. Retaining its designated employment sites, given the loss of other industrial/commercial sites to other uses in the borough, is seen as an important element of that strategy.

Change document?

None.

SP 07 Employment New Sites

Reference	Name	Organisation name/Client	Para start	end	Page no.
Object	Ian	RPS			
80 /1164	Anderson	Laing Homes Ltd (North London)			

Comment

Policy fails to recognise that mixed use development will also generate jobs.

Waltham Forest council response

Accepted.

Change document?

Change policy wording - insert words OR MIXED USES in bold:

...ON NEW SITES FOR EMPLOYMENT OR MIXED USES WILL BE WELCOMED WHERE...

SP 06 Employment Retention

Reference	Name	Organisation name/Client	Para start	end	Page no.
Object	Ian	RPS	1.72		20
80 /1163	Anderson	Laing Homes Ltd (North London)			

Comment

Object to the Council not releasing employment land for housing where it is no longer suitable or appropriate for employment use. The wording used in paragraph 1.72 in relation to re-using impractical employment land for alternative uses such as housing, should be incorporated in the policy.

Waltham Forest council response

Not Accepted - The Council makes clear elsewhere in the Plan (cf policy HSG 4) its position to normally consider housing as a possible alternative use for former all vacant / redundant sites / buildings. No purpose would be served by stressing that point in policy SP6 specifically.

Change document?

None.

SP 11 Housing Quantity

Reference	Name	Organisation name/Client	Para start	end	Page no.
Object	Giles	The House Builders Federation			22
2 /500	Atkinson				

Comment

Housing figures: failure to plan for post 2006 and use the LPAC/GLA Housing Capacity Figure to 2016

Waltham Forest council response

The Draft plan will be amended to refer to RPG9 and to the post -2006 situation.

Change document?

Add the the following to SP11:

"to accord with Strategic Guidance (RPG3). In respect of the post 2006 period the Council is committed to accommodating its contribution to the 23,000 annual additional households figures for London in Regional Guidance (RPG9)."

Add to the end of para 1.80

"In respect of the post 2006 period the Council is committed to accommodating its contribution to the 23,000 annual additional households figures for London in Regional Guidance (RPG9). The Draft London Plan (July 2002) indicates a Total Target for the Provision of additional 'homes', 1997 - 2016 of 9140 and an annual monitoring target of 460. The UDP will need to be in general conformity with the London Plan when adopted but will have regard to its draft provisions in the interim."

SP 11 Housing Quantity

Reference	Name	Organisation name/Client	Para start	end	Page no.
Object	Terry	Bryant Homes			22
81 /552	Fuller				

Comment

The Council should be relying on the housing figure arrived at in the LPAC/GLA Housing Capacity Study. In relying on RPG3 it is ludicrous for the Council to be 'planning' for a period which is substantially finished already and will by the time the plan is adopted be effectively over.

Waltham Forest council response

The Housing Capacity Figure has not yet been adopted formally as planning guidance and will depend on the adoption of the SDS. The Policy will nevertheless be amended to read as below:

Change document?

Add the the following to SP11:

"to accord with Strategic Guidance (RPG3). In respect of the post 2006 period the Council is committed to accommodating its contribution to the 23,000 annual additional households figures for London in Regional Guidance (RPG9)."

Add to the end of para 1.80

"In respect of the post 2006 period the Council is committed to accommodating its contribution to the 23,000 annual additional households figures for London in Regional Guidance (RPG9). The Draft London Plan (July 2002) indicates a Total Target for the Provision of additional 'homes', 1997 - 2016 of 9140 and an annual monitoring target of 460. The UDP will need to be in general conformity with the London Plan when adopted but will have regard to its draft provisions in the interim."

SP 11 Housing Quantity

Reference	Name	Organisation name/Client	Para start	end	Page no.
Object	P.T.	Prowting Homes South East Ltd			22
91 /1080	Smith				

Comment

PHSE objects to the failure of the Council to adequately plan for housing in the post 2006 period by relying on the existing RPG3 figures. It should be planning for 6,805 additional units over the period 1997-2016.

Waltham Forest council response

The figure has not been formally adopted in an approved SDS. The policy will be amended as below:

Change document?

Add the the following to SP11:

"to accord with Strategic Guidance (RPG3). In respect of the post 2006 period the Council is committed to accommodating its contribution to the 23,000 annual additional households figures for London in Regional Guidance (RPG9)."

Add to the end of para 1.80

"In respect of the post 2006 period the Council is committed to accommodating its contribution to the 23,000 annual additional households figures for London in Regional Guidance (RPG9). The Draft London Plan (July 2002) indicates a Total Target for the Provision of additional 'homes', 1997 - 2016 of 9140 and an annual monitoring target of 460. The UDP will need to be in general conformity with the London Plan when adopted but will have regard to its draft provisions in the interim."

SP 11 Housing Quantity

Reference	Name	Organisation name/Client	Para start	end	Page no.
Object	Anthony	Greater London Authority			22
76 /1098	Hollingsworth				

Comment

The figure of 4950 seems dated given the ten year life of the UDP. Continuity between the capacity figure of 6805 net additional units from the GLA Housing Capacity Study of 2000 given in para. 3.33 of the Part two Housing chapter would be more appropriate.

Amend text to include reference to the GLA Housing capacity study figure of 6805 minimum for the period 1997-2016.

Waltham Forest council response

Agreed text to be amended.

Change document?

Amend text to include reference to the GLA Housing capacity study figure of 6805 conventional capacity minimum for the period 1997-2016. Reference will also be made to 9,140 additional homes target in the Draft London Plan .

Add the following to the end of SP11

"to accord with Strategic Guidance (RPG3). In respect of the post 2006 period the Council is committed to accommodating its contribution to the 23,000 annual additional households figures for London in Regional Guidance (RPG9). The Council will review its policy to ensure that it reflects the Mayor's London Plan when it is published."

SP 11 Housing Quantity

Reference	Name	Organisation name/Client	Para start	end	Page no.
Object	Ian	RPS			22
80 /1117	Anderson	Laing Homes Ltd (North London)			

Comment

We object to this policy as no reference is made to Guidance set out in RPG9 which advises the emerging guidance of the Mayor's SDS which will replace RPG will provide guidance on how the 23,000 additional household per annum will be distributed within London.

Waltham Forest council response

Reference is already made in the Chapter to RPG 9 and the 23,000 additional dwellings. The LPAC/GLA Housing Capacity Figure has not yet been adopted formally as planning guidance and will depend on the adoption of the SDS. Reference will be made to the draft London Plan (July 2002) The Policy will nevertheless be amended to read as below:

Change document?

Add the the following to SP11:

"to accord with Strategic Guidance (RPG3). In respect of the post 2006 period the Council is committed to accommodating its contribution to the 23,000 annual additional households figures for London in Regional Guidance (RPG9)."

Add to the end of para 1.80

"In respect of the post 2006 period the Council is committed to accommodating its contribution to the 23,000 annual additional households figures for London in Regional Guidance (RPG9). The Draft London Plan (July 2002) indicates a Total Target for the Provision of additional 'homes', 1997 - 2016 of 9140 and an annual monitoring target of 460. The UDP will need to be in general conformity with the London Plan when adopted but will have regard to its draft provisions in the interim."

SP 11 Housing Quantity

Reference	Name	Organisation name/Client	Para start	end	Page no.
Object	Ken	Government Office for London			22
34 /1141	Bean				

Comment

Policy states Council will seek to ensure 4950 new homes are provided in period from 1992 - 2006, as per Strategic Guidance (RPG3). This conflicts with PPG 12 (para. 6.7) - should provide framework for development for 15 years. Policy SP11 and supporting text should be amended to reflect strategic policy for London established in RPG9 and the 1999 (GLA) Housing Capacity Study - with a target of 6805 net additional dwellings for the period 1997 - 2016.

Waltham Forest council response

Proposed alterations accepted - text of policy and reasoned justification to be amended accordingly.

Change document?

Policy SP11 and supporting text to be amended to reflect strategic policy for London established in RPG9 and the 1999 (GLA) Housing Capacity Study - with a target of 6805 net additional dwellings for the period 1997 - 2016.

Add the the following to SP11:

"to accord with Strategic Guidance (RPG3). In respect of the post 2006 period the Council is committed to accommodating its contribution to the 23,000 annual additional households figures for London in Regional Guidance (RPG9)."

Add to the end of para 1.80

"In respect of the post 2006 period the Council is committed to accommodating its contribution to the 23,000 annual additional households figures for London in Regional Guidance (RPG9). The Draft London Plan (July 2002) indicates a Total Target for the Provision of additional 'homes', 1997 - 2016 of 9140 and an annual monitoring target of 460. The UDP will need to be in general conformity with the London Plan when adopted but will have regard to its draft provisions in the interim."

SP 11 Housing Quantity

Reference	Name	Organisation name/Client	Para start	end	Page no.
Object	Susan	The Empty Homes Agency			
95 /1146	Heinrich				

Comment

Want some reference to sustainable development included in the policies of the Plan - in particular making reference to re-using previously developed land and bringing back empty homes and converting buildings (as per paragraph 2 of PPG 3).

Waltham Forest council response

These are already covered in national planning guidance - there is no need to repeat them specifically in the UDP policies.

Change document?

None.

SP 11 Housing Quantity

Reference	Name	Organisation name/Client	Para start	end	Page no.
Object	P.T.	Prowting Homes South East Ltd			22
91 /1149	Smith				

Comment

Policy states Council will seek to ensure 4950 new homes are provided in period from 1992 - 2006, as per Strategic Guidance (RPG3). This conflicts with PPG 12 (para. 6.7) - should provide framework for development for 15 years. Policy SP11 and supporting text should be amended to reflect strategic policy for London established in RPG9 and the 1999 (GLA) Housing Capacity Study - with a target of 6805 net additional dwellings for the period 1997 - 2016.

Waltham Forest council response

Proposed alterations accepted - text of policy and reasoned justification to be amended accordingly.

Change document?

Policy SP11 and supporting text to be amended to reflect strategic policy for London established in RPG9 and the 1999 (GLA) Housing Capacity Study - with a target of 6805 net additional dwellings for the period 1997 - 2016.

Add the the following to SP11:

"to accord with Strategic Guidance (RPG3). In respect of the post 2006 period the Council is committed to accommodating its contribution to the 23,000 annual additional households figures for London in Regional Guidance (RPG9)."

Add to the end of para 1.80

"In respect of the post 2006 period the Council is committed to accommodating its contribution to the 23,000 annual additional households figures for London in Regional Guidance (RPG9). The Draft London Plan (July 2002) indicates a Total Target for the Provision of additional 'homes', 1997 - 2016 of 9140 and an annual monitoring target of 460. The UDP will need to be in general conformity with the London Plan when adopted but will have regard to its draft provisions in the interim."

SP 11 Housing Quantity

Reference	Name	Organisation name/Client	Para start	end	Page no.
Object	Anthony	Greater London Authority			22
76 /1158	Hollingsworth				

Comment

The figure of 4950 seems dated given the ten year life of the UDP. Continuity between the capacity figure of 6805 net additional units from the GLA Housing Capacity Study of 2000 given in para. 3.33 of the Part two Housing chapter would be more appropriate.

Waltham Forest council response

Accepted.

Change document?

Amend text to include reference to the GLA Housing capacity study figure of 6805 minimum for the period 1997-2016.

Add the the following to SP11:

"to accord with Strategic Guidance (RPG3). In respect of the post 2006 period the Council is committed to accommodating its contribution to the 23,000 annual additional households figures for London in Regional Guidance (RPG9)."

Add to the end of para 1.80

"In respect of the post 2006 period the Council is committed to accommodating its contribution to the 23,000 annual additional households figures for London in Regional Guidance (RPG9). The Draft London Plan (July 2002) indicates a Total Target for the Provision of additional 'homes', 1997 - 2016 of 9140 and an annual monitoring target of 460. The UDP will need to be in general conformity with the London Plan when adopted but will have regard to its draft provisions in the interim."

SP 12 Housing Quality

Reference	Name	Organisation name/Client	Para start	end	Page no.
Object	Robert J	Bushwood Area Residents Association			22
86 /1143	Gay				

Comment

Council should promote good design in all developments - not simply those built at higher densities.

Waltham Forest council response

Objective of policy amendment was to promote good design particularly in high density schemes.

Change document?

Amend text to add 'in particular' before'where development at high densities.....'

SP 12 Housing Quality

Reference	Name	Organisation name/Client	Para start	end	Page no.
Object	Anthony	Greater London Authority			22
76 /1159	Hollingsworth				

Comment

New text implies that a high standard of design will only be expected of high-density schemes.

Waltham Forest council response

Accepted.

Change document?

Amend text to add 'in particular' before'where development at high densities.....'

SP 13 General Community Facilities

Reference	Name	Organisation name/Client	Para start	end	Page no.
Support	Anita	Drivers Jonas			22
54 /1183	Young	NHS Executive			

Comment

Supports the policy's positive approach towards healthcare provision.

Waltham Forest council response

Change document?

SP 14 Leisure & Recreation

Reference	Name	Organisation name/Client	Para start	end	Page no.
Object	Simon	Bellway Homes Ltd			23
60 /1186	Butler-Finbow				

Comment

Policy is inflexible - there may be situations where sites in recreation & leisure use can be justifiably lost to other uses. Insert words "where appropriate" - policy to read:

THE COUNCIL WILL SEEK WHERE APPROPRIATE TO RETAIN EXISTING....

Waltham Forest council response

Not accepted - policy is unchanged from the adopted 1996 UDP. It has been subject to previous scrutiny and is considered appropriate in the context of the other policies in the Plan.

Change document?

None.

SP 15 Planning for Equality

Reference	Name	Organisation name/Client	Para start	end	Page no.
Object	Mark	London Tourist Board			23
99 /1148	Balaam				

Comment

No reference included to Disability Discrimination Act, 2004 (nor at para. 1.45).

Waltham Forest council response

Accepted.

[Change document?](#)

Text to be updated.

SP 15 Planning for Equality

Reference	Name	Organisation name/Client	Para start	end	Page no.
Object	Ruth				23
59 /1185	Bashall				

Comment

No reference included to Disability Discrimination Act, 2004 (nor at para. 1.45).

Waltham Forest council response

Accepted.

[Change document?](#)

Text to be updated.

SP 15 Planning for Equality

Reference	Name	Organisation name/Client	Para start	end	Page no.
Object	Shenaz	Access Alliance Waltham Forest	1.88		24
29 /1171	Suleman				

Comment

No mention of the current Disability Discrimination Act (nor at para. 1.45) - text requires updating.

Waltham Forest council response

Accepted.

[Change document?](#)

Text to be updated.

SP 16 Urban Regeneration

Reference	Name	Organisation name/Client	Para start	end	Page no.
Support	Valerie	London First			24
92 /1145	Owen				

Comment

Fully endorse commitment to urban design and regeneration.

Waltham Forest council response

[Change document?](#)

SP 16 Urban Regeneration

Reference	Name	Organisation name/Client	Para start	end	Page no.
Object	Anthony	Greater London Authority			24
76 /1160	Hollingsworth				

Comment

Whilst this policy is generally supported, it largely equates urban regeneration considerations to the protecting land and premises suitable for employment use. There is no consideration to other forms of development which can contribute to the regeneration of the borough, including housing, retailing, transport, community and cultural land uses, or a mix of some or all of these uses. The numbered points in para. 1.90 indicate that employment considerations are just one of a range of urban regeneration priorities for the borough and the policy should reflect this. Consideration should be given to a new policy which encourages mixed-use, high density developments at sites which have good public transport accessibility. This would relate well to the review of policy guidance in paragraphs 1.32 and 1.33 on pages 9 and 10.

Waltham Forest council response

Accepted.

Change document?

Amend the policy text to include and acknowledge the importance of other types and forms of development, including mixed-use schemes (such as in the proposed Major Opportunity Site designation), in the urban regeneration of the borough.

SP 16 Urban Regeneration

Reference	Name	Organisation name/Client	Para start	end	Page no.
Object	Ian	RPS			24
80 /1162	Anderson	Laing Homes Ltd (North London)			

Comment

No reference included to the ability of major housing development to deliver the same regeneration objectives that business can achieve.

Waltham Forest council response

Accepted.

Change document?

To include reference to major housing development in the policy.

SP 16 Urban Regeneration

Reference	Name	Organisation name/Client	Para start	end	Page no.
Support	Claire	Lee Valley Regional Park Authority			24
63 /1168	Martin				

Comment

Supports new policy on Urban Regeneration which recognises need to support initiatives currently under way - e.g. at Temple Mills and Lea Bridge Gateway.

Waltham Forest council response

Change document?

SP 16 Urban Regeneration

Reference	Name	Organisation name/Client	Para start	end	Page no.
Object	S	New Lammas Lands Defence Committee			24
45 /1175	Savage				

Comment

This policy replaces the former Environmental Priority Areas policy - which had a presumption in favour of open space. There now seems to be a presumption in favour of development - e.g. for sites for employment use.

Waltham Forest council response

The Plan has to be read as a whole; this policy has been introduced to reflect the revised emphasis the Council is now giving to sustainable economic regeneration in the borough. A key element of the overall Plan strategy remains as stated at policy SP1 (v) to:

CONSERVE AND ENHANCE OPEN SPACES WITHIN THE URBAN AREA WHICH HAVE AN IMPORTANT ROLE TO PLAY WHETHER FOR AMENITY REASONS, FOR NATURE CONSERVATION, OR FOR RECREATION AND COMMUNITY PURPOSES;....

Change document?

None.

SP 16 Urban Regeneration

Reference	Name	Organisation name/Client	Para start	end	Page no.
Object	Katy				24
47 /1179	Andrews				

Comment

This policy replaces the former Environmental Priority Areas policy - which had a presumption in favour of open space. There now seems to be a presumption in favour of development - e.g. for sites for employment use.

Waltham Forest council response

The Plan has to be read as a whole; this policy has been introduced to reflect the revised emphasis the Council is now giving to sustainable economic regeneration in the borough. A key element of the overall Plan strategy remains as stated at policy SP1 (v) to:

CONSERVE AND ENHANCE OPEN SPACES WITHIN THE URBAN AREA WHICH HAVE AN IMPORTANT ROLE TO PLAY WHETHER FOR AMENITY REASONS, FOR NATURE CONSERVATION, OR FOR RECREATION AND COMMUNITY PURPOSES;....

Change document?

None.

SP 16 Urban Regeneration

Reference	Name	Organisation name/Client	Para start	end	Page no.
Object	Mark	Robert Turley Associates			24
65 /1189	Harris	J Sainsbury's Plc			

Comment

The policy should accept that designated employment sites could be put to alternative uses for regeneration purposes - e.g. retail & leisure use - and to support local employment objectives.

Waltham Forest council response

The policy does not presume that uses other than B1 - B8 activities will never be acceptable on its designated employment sites. It does attempt - within the context set by the other policies in the Plan - to emphasise the attempts being made by the Council to secure economic regeneration within the borough. Retaining its designated employment sites, given the loss of other industrial/commercial sites to other uses in the borough, is seen as an important element of that strategy.

Change document?

None.

SP 16 Urban Regeneration

Reference	Name	Organisation name/Client	Para start	end	Page no.
Object	Alastair	Cushman & Wakefield Healey & Baker			24
79 /1193	Crowdy	Tesco Stores Ltd			

Comment

Regeneration objectives can be met by encouraging other uses in employment areas. These can bring wider regeneration benefits - e.g. retail development - subject to site specific considerations and other Plan policies.

Waltham Forest council response

The policy does not presume that uses other than B1 - B8 activities will never be acceptable on its designated employment sites. It does attempt - within the context set by the other policies in the Plan - to emphasise the attempts being made by the Council to secure economic regeneration within the borough. Retaining its designated employment sites, given the loss of other industrial/commercial sites to other uses in the borough, is seen as an important element of that strategy.

Change document?

None.

SP 16 Urban Regeneration

Reference	Name	Organisation name/Client	Para start	end	Page no.
Object	Jonathan	London Borough of Newham	1.92		25
14 /1170	Taylor				

Comment

Reference should be made to the impact of the Stratford Rail Lands development - and the opportunity to negotiate planning obligations related to that.

Waltham Forest council response

Accepted.

Change document?

References to be added on these points.

SP 17 Planning Obligations

Reference	Name	Organisation name/Client	Para start	end	Page no.
Object	Sean	Drivers Jonas	1.93	1.95	27
62 /1188	McGrath	C G Property Ltd			

Comment

The policy is unclear - it should state that contributions should meet the tests set out in DETR Circular 1/97.

Waltham Forest council response

Not accepted - this advice is already available in the circular and does not need re-iteration in the UDP.

Change document?

None.

Part 1 General Comments

Reference	Name	Organisation name/Client	Para start	end	Page no.
Object	Simon	Bellway Homes Ltd	1.96		27
60 /1187	Butler-Finbow				

Comment

The recent Planning Green Paper anticipates introducing plan monitoring on a more regular basis than the five years advised in PPG 12. In the light of the Green Paper, the council are asked to monitor the UDP on an annual basis.

Waltham Forest council response

The Council are sympathetic to this request. PPG 12 remains the relevant advice here - it would be best to await confirmation of the Government's revised advice before committing the UDP to more regular updating. The preparation of a local development framework should permit much more regular updating of local policies and proposals as necessary.

Change document?

None.

Part 1 General Comments

Reference	Name	Organisation name/Client	Para start	end	Page no.
Object	Katy		1.105		29
47 /1180	Andrews				

Comment

Council should retain its original part (iii) of this paragraph which sought to extend the Green Belt southwards in the Lea Valley.

Waltham Forest council response

The Council is satisfied that the current Metropolitan Open Land protection given to these areas is appropriate - within the overall policy framework set by both Government regional & London planning guidance - and now within that set out in the emerging Spatial development Strategy for London.

Change document?

None.

