



Walthamstow Town Centre Area Action Plan Consultation Report

Part II - Schedule of Full Representations Regulation 22(1)(e)

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<p>Dokumenti apo përmbledhja e tij mund të sigurohen në gjuhë tjera, shtyp të madh, Braille, audiokasetë apo i përkthyer sipas kërkesës. Nëse ju keni nevojë për këto shërbime, ju lusim na kontaktoni në adresën e dhënë më poshtë.</p> <p style="text-align: right;">Albanian <input type="checkbox"/></p>	<p>આ અહેવાલ કે એનું સંક્ષેપ બીજી ભાષાઓમાં, મોટા અક્ષરોમાં, બ્રેઈલમાં, ઓડિયો ટેપ પર અથવા ભાષાંતર સેવા દ્વારા ઉપલબ્ધ થઈ શકે છે. જો તમને આ સેવાની જરૂર લાગે, તો કૃપા કરીને અમને નીચેના સરનામે સંપર્ક કરો.</p> <p style="text-align: right;">Gujarati <input type="checkbox"/></p>
<p>يمكن توفير هذه الوثيقة أو ملخصها بلغات أخرى أو بالطبعة الكبيرة أو بلغة بريل أو على الشريط. ويمكن توفير خدمة ترجمة عند الطلب. وإذا احتجت منالا من هذه الخدمات الرجاء الاتصال معنا على العنوان المذكور أدناه.</p> <p style="text-align: right;">Arabic <input type="checkbox"/></p>	<p>यह पर्चा या इसका संक्षेप अन्य भाषाओं में, बड़े अक्षरों में या सुनने वाली टेप पर माँग कर लिया जा सकता है, और अन्य भाषाओं में अनुवाद की सुविधा भी मिल सकती है। यदि आपको इन सुविधाओं की ज़रूरत है तो कृपया निम्नलिखित पते पर हमारे साथ संपर्क करें।</p> <p style="text-align: right;">Hindi <input type="checkbox"/></p>
<p>অনুরোধক্রমে এই ডকুমেন্ট অথবা এর সারসর্ম অন্যান্য ভাষায়, বড় ছাপার অক্ষরে, ব্রেইল বা অঙ্কলিপিতে, অডিও টেইপ বা বাজিয়ে শোনার কেসেটে অথবা অনুবাদ করে দেয়ার ব্যবস্থা করা যাবে। আপনার যদি এসব সেবাসমূহের প্রয়োজন হয়, তাহলে অনুগ্রহ করে আমাদের সাথে নীচের ঠিকানায় যোগাযোগ করুন।</p> <p style="text-align: right;">Bengali <input type="checkbox"/></p>	<p>ਇਹ ਪਰਚਾ ਜਾਂ ਇਹਦਾ ਖੁਲਾਸਾ ਹੋਰ ਭਾਸ਼ਾਵਾਂ ਵਿਚ, ਵੱਡੇ ਅੱਖਰਾਂ ਵਿਚ, ਜਾਂ ਸੁਣਨ ਵਾਲੀ ਟੇਪ 'ਤੇ ਮੰਗ ਕੇ ਲਿਆ ਜਾ ਸਕਦਾ ਹੈ, ਅਤੇ ਹੋਰ ਭਾਸ਼ਾਵਾਂ ਵਿਚ ਤਰਜਮਾ ਕਰਨ ਦੀ ਸਹੂਲਤ ਵੀ ਮਿਲ ਸਕਦੀ ਹੈ। ਜੇ ਇਹਨਾਂ ਸਹੂਲਤਾਂ ਦੀ ਤੁਹਾਨੂੰ ਲੋੜ ਹੈ, ਤਾਂ ਕਿਰਪਾ ਕਰਕੇ ਹੇਠ ਲਿਖੇ ਪਤੇ 'ਤੇ ਸਾਡੇ ਨਾਲ ਸੰਪਰਕ ਕਰੋ।</p> <p style="text-align: right;">Punjabi <input type="checkbox"/></p>
<p>我們可以按照您的要求向您提供此文件或其摘要的母語譯本、大字印刷版本、盲文版本、錄音帶或者提供其他翻譯服務。如果您需要以上服務，請通過以下的地址與我們取得聯繫。</p> <p style="text-align: right;">Chinese <input type="checkbox"/></p>	<p>İstekte bulunursanız, bu broşürü ya da broşürün özetinin Türkçesini size gönderebiliriz. Ayrıca broşürün iri harfli baskısı, görme engelliler için parmak ucuyla okunabilen Braille alfabesiyle yazılmış kabartma şekli ve ses kaseti de olup istek üzerine broşürün özetini sözlü olarak da size Türkçe okuyabiliriz. Bu hizmetlerden yararlanmak için aşağıda yazılı adresten bize ulaşabilirsiniz.</p> <p style="text-align: right;">Turkish <input type="checkbox"/></p>
<p>Ce document ainsi que son résumé sont disponibles dans d'autres langues, en gros caractères, en braille et sur support audio. Une version traduite peut également être obtenue sur demande. Pour obtenir l'un de ces services, veuillez nous contacter à l'adresse ci-dessous.</p> <p style="text-align: right;">French <input type="checkbox"/></p>	<p>یہ دستاویز یا اس کا خلاصہ دیگر زبانوں، بڑے حروف، یا آڈیو ٹیپ کی شکل میں دستیاب ہو سکتا ہے، یا درخواست کرنے پر ترجمے کی سروس دستیاب ہو سکتی ہے۔ اگر آپ ان سروسز تک رسائی حاصل کرنا چاہتے ہیں تو براے مہربانی ہم سے نیچے دیے گئے پتے پر رابطہ کیجئے۔</p> <p style="text-align: right;">Urdu <input type="checkbox"/></p>
<p>Name _____ Address _____ _____ _____ Telephone No _____</p>	<p>CONTACT: Planning Policy Team Environment and Regeneration London Borough of Waltham Forest Sycamore House, Waltham Forest Town Hall Forest Road, Walthamstow, London, E17 4JF</p> <p>Telephone 020 8496 3000 Email: planning.policy@walthamforest.gov.uk Web site: www.walthamforest.gov.uk</p>

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Introduction

1.1 This report for the representations on the Walthamstow Town Centre Area Action Proposed Submission is divided into three separate parts:

Part I - Summary of Representations and Council's Response under Regulation 22(1)(e)

Part II - Schedule of Full Representations under Regulation 22(1)(e)(**this document**)

Part III - Copies of all representations on the Proposed Submission under Regulation 22(1)(d).

1.2 The table for Part I starting from page 4 is sorted in 'Chapter' order. Page 2 is a list of respondents to the consultation on the Proposed Submission.

Other Consultation Reports

1.3 The following reports are also relevant to the consultation on the Walthamstow Town Centre Area Action Plan Proposed Submission:

Statement of Consultation under Regulation 22(1)(c) - setting out how the London Borough of Waltham Forest has complied with the consultation requirements regarding the following:

The bodies and persons invited to make representations

How those bodies and persons were consulted

A summary of the main issues raised by the representations

How the representations made were taken into account.

Summary of Main Issues raised by representations on the Proposed Submission under Regulation of 22(1)(c)(v).

Schedule of Post Publication Minor Changes - setting out proposed changes in response to the representations received during the consultation on the Proposed Submission.

Respondent ID	Respondent	Representation ID	Submission Type
151002	Thames Water Utilities Ltd - (Agent: Phil Jameson, Associate Planner, Savills)	wtcps32 -34	Rep Form
151476	Mr Simon Munk	wtcps10 - 12	Web
151495	Outdoor Advertising Association and British Sign & Graphics Association (Chris Thomas)	wtcps45 - 46	Rep Form
152301	Planning Policy Officer The Theatres Trust (Rose Freeman, Planning Policy Officer)	wtcps31	Rep Form
401992	Mr Shaun Hexter	wtcps1 & wtcps5 - wtcps9	Web
441261	English Heritage (Nicholas Bishop, Regional Planning Adviser)	wtcps39	Letter
497192	Barclays Bank Plc (Agent: Michael Fearn, Planning Director, Shireconsulting)	wtcps22	Rep Form
500040	Mr Philip Herlihy	wtcps13 - 19	
534011	Greater London Authority (Ms Sukhpreet Khull)	wtcps47 - 55	Letter
537451	Openreach (BT) Repayments Team (Mick Sharp, Repayments Project Engineer)	wtcps44	Letter
679398	Canal and River Trust (Mrs Claire McLean, Area Planner)	wtcps30	Email
680877	Environment Agency (Miss Eleri Randall, Planning Liaison Officer Environment Agency)	wtcps27 - 28	Rep Form
732145	Marine Management Organisation (Angela Atkinson, Stakeholder and Networks Officer)	wtcps21	Letter
746353	Sainsbury's Supermarkets Ltd (Chris Deeks, Assistant Planner, Turley Associates)	wtcps25 - 26	Rep Form
747924	Poldervaart	Wtcps2 - 4	Web
753667	Mr Robert Lindsay-Smith	wtcps35 - 38	Rep Form
760701	London Underground Limited (Shahina Inayathusein, Information Manager)	wtcps24	Letter
760705	Highways Agency (Ms Felicity Drewett)	wtcps23	Email
763275	Morrisons (Agent: Mr Anthony Ferguson, Senior Associate, Peacock and Smith)	wtcps20	Rep Form
763374	Natural England (Miss Francesca Barker, Planning Advisor)	wtcps29	Rep Form
763442	Sustrans (Ms Francesca Leadlay, Policy Advisor)	wtcps40 - 42	Email

**Schedule of Full Representations on the Walthamstow Town Centre Area Action Plan Proposed Submission
(54 Representations from 21 Respondents)**

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
151002	Thames Water Utilities Ltd - (Agent: Phil Jameson, Associate Planner, Savills)	wtcps33	Section 35 - Paragraph 35.13	Yes	Yes	Not specified	Thames Water supports the inclusion of paragraph 35.13 in respect of Waltham Forest's engagement with utilities providers to ensure that necessary infrastructure is planned and delivered to support growth.	Not Specified	No	Not Specified
151002	Thames Water Utilities Ltd - (Agent: Phil Jameson, Associate Planner, Savills)	wtcps34	Section 35 - Paragraph 35.19	Yes	Yes	Not specified	The inclusion of paragraphs 35.19 and 35.20 within the Area Action Plan is supported. Due to the complexities of water and sewerage networks it is difficult for Thames Water to comment on the impact of the proposed development without an exact understanding of the scale and phasing of development at the proposed locations. Thames Water would expect to be consulted on most major planning applications. The earlier Thames Water is able to be involved in the planning application process the greater the opportunity we have to make known our concerns regarding the ability of the local infrastructure to support development and to ensure any proposed development has no detrimental impact on our assets or the service we provide to existing customers. Furthermore, early consultation allows Thames Water to work with developers and other agencies to enable the issues caused by a development to be mitigated, or a compromise to be reached. When carrying out the necessary early consultations with Thames Water regarding the capacity of water and sewerage systems, adequate time should be allowed to consider	Not Specified	No	Not Specified

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							development options and proposals so that an informed response can be formulated. It is not always possible to provide detailed responses within a matter of weeks; for example, the modelling of water and sewerage infrastructure systems will be important to many consultation responses and this can take a long time to carry out (e.g. modelling of sewerage systems can be dependent on waiting for storm periods when the sewers are at peak flows).			
151002	Thames Water Utilities Ltd - (Agent: Phil Jameson, Associate Planner, Savills)	wtcps32	Section 13 - Policy WTC14 - Access to Sites of Nature Conservation	Yes	Yes	Not specified	Thank you for the opportunity for Thames Water Utilities Ltd. (Thames Water) to comment on the above. Thames Water's Property Services function is now being delivered by Savills (UK) Limited as Thames Water's appointed supplier. Savills are therefore pleased to respond to the above consultation on behalf of Thames Water. TWUL is the statutory water and sewerage for London Borough of Waltham Forest. Under the Water Industry Act, Thames Water has a duty to ensure that its area is effectively drained and to effectively deal with the contents of its sewers. That duty is mindful of available resources and requires the assistance of local planning authorities in ensuring that those resources are not overwhelmed in complying with those duties. Water and Wastewater Infrastructure Thames Water is aware that water and waste water infrastructure issues are covered in other Waltham Forest DPD documents and in particular the Development Management Policies Document. If the Council does not consider that coverage of water and waste water infrastructure issues is	Not Specified	No	Not Specified

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							appropriate within the Walthamstow Town Center AAP a reference to Development Management Policy DM35 (Water) would be helpful to make it clear that development at the Key Sites will be expected to consider water and waste water infrastructure capacity issues. In relation to the provision of water and waste water infrastructure to support development it will be essential that developers demonstrate that adequate capacity exists both on and off site to serve development proposed and that development would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing sewerage infrastructure. Where there is a capacity problem and no improvements are programmed by the water company, then the developer needs to contact the water authority to agree what improvements are required and how they will be funded prior to any occupation of the development. Where upgrades to existing infrastructure are identified as necessary to serve new development it is essential that these are in place ahead of occupation if adverse impacts such as sewer flooding to property and no/low water pressures are to be avoided.			
151476	Mr Simon Munk	wtcps10	Section 10 - Policy WTC3 - Retail	Yes	No	Effective	Given the correct importance the plan puts on not just the market but the small independent shops that are common in Walthamstow Town Centre, then WTC3 should clearly also provide clear planning protection and guidance to these units.	I would like to see section WTC3 h. amended to read: "Promote, support and enhance the development of Walthamstow Market and its independent shops". I'd	No	Not Specified

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								also like to see as part of the area action plan, strategies identified to not just protect these units, but also enhance them and encourage better use of the smaller retail units.		
151476	Mr Simon Munk	wtcps11	Section 11 - Paragraph 11.9	Yes	No	Effective	The sustainable transport measures are welcomed. But there is one element to the puzzle completely missing - cycle parking for new residential developments.	Reword viii: from "Adequate safe and secure cycle parking will be incorporated in the centre as part of public realm improvements and new development." to "Adequate safe and secure cycle parking will be incorporated in the centre as part of public realm improvement and new development, with all new mixed-use or residential developments requiring cycle parking for new residents."	No	Not Specified
151476	Mr Simon Munk	wtcps12	Section 12 - Paragraph 12.25	Yes	No	Effective	In designating only a tiny proportion of the historic shop fronts in the area, this amounts to a token effort to preserve or promote identity.	The successful approach to shop front character areas should be applied far more widely in Walthamstow Town Centre. This need not be by the council directly engaging in regeneration, but could be in the form of, for instance business rate reduction or increases for properties who either amend shop fronts to better reflect the buildings and area or negatively impact on the area/ don't conform to the shop front character established by the council.	No	Not Specified

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151495	Outdoor Advertising Association and British Sign & Graphics Association (Chris Thomas)	wtcps45	Section12 - Paragraph 12.23	No	No	Justified; Effective; Consistent with national policy	These representations are submitted on behalf of the British Sign and Graphics Association in response to additions to the earlier drafts of the above AAP. The BSGA represents 65% of the sales of signage throughout the UK and monitors development plans throughout the country to ensure the emerging Local Plan policies do not inappropriately apply more onerous considerations on advertisements than already apply within the NPPF, Circular 03/2007 and the Town and Country Planning (Control of Advertisements)(England) Regulations 2007 (as amended). Our comments relate to section 12 and, in particular 12.21ff "Shop Fronts" and "Shop Front Character Areas". Paragraph 12.23 is, we believe, unique in seeking to control just about every individual element of shop fronts and their signs. It is without doubt exceptional in its zeal to remove virtually every facet of individual choice. We would like to know how the Council propose to control the following: * fascia signs - the position and depth of a fascia sign will, for the most part, be dictated by the design (often existing) of the shop front. Since most fascia signs (particularly non-illuminated) are granted deemed consent under the Control of Advertisements Regulations (Classes 4B and 5 in Schedule 3), the Council are unable to control their position or depth either on the shopfront itself or in relation to neighbouring shopfronts. And in these circumstances, it is certainly not in the Council's control to insist on timber, hand-painted signs which would, anyway, look completely out of	Not Specified	No	Not Specified

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							place on many modern shopfronts. * colour - it is not within the Council's powers to insist on certain colours; or that these be "uniform" (and why should "windows" be "painted"?). * the relocation of "blade" signage (does this mean projecting signs?). Again, most non-illuminated projecting signs on shopfronts may be displayed with deemed consent (Class 5), provided they are set below first floor window cill level. Why should any shopkeeper wish to relocate his signs higher where they will require an application for express consent and an accompanying fee? * window displays - these are either excepted from control (Class 1 in Schedule 2) or have deemed consent (Class 12 in Schedule 3 or even Class 5 in schedule 3 if they are on the outside of Ct shop window). As such, they are outside the Council's control; and do the Council really think that a shopkeeper will modify his window display just to please the Council? * fabric awnings - how do the Council propose to introduce these onto private shops? Will the Council make the application and pay the fee for the appropriate planning permission and then pay for the structure and undertake the installation work (and what if the shopkeeper does not consent!)? * "to let" signs are again mostly permitted with deemed consent under Class 3 in Schedule 3; and are thereby outside the Council's control.			
151495	Outdoor Advertising Association and British Sign &	wtcps46	Section 12 - Paragraph 12.25	No	No	Justified; Effective; Consistent with national policy	In paragraph 12.25, we would point out that signs ("advertisements" within the statutory definition) cannot be controlled by Article 4 directions. All reference to "signage" in this	Not Specified	No	Not Specified

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	Graphics Association (Chris Thomas)						paragraph is wrong in law and should be deleted. In all, we suggest that the whole section on shopfronts should be re-written with a far more realistic aim that the Council will advise and work with all those involved to seek to achieve attractive shopfronts which are well designed in themselves and in relation to the host building, and relate well to their surroundings. How this is achieved will be through individual choice and agreement with no pre-conceived ideas about what is, and what is not, desirable.			
152301	Planning Policy Officer The Theatres Trust (Rose Freeman, Planning Policy Officer)	wtcps31	Section 10 - Policy WTC4 - Leisure, Entertainment, Culture and Tourism	Not specified	Yes	Not specified	We note SO3 to create a vibrant town centre by establishing a leisure and entertainment offer and evening economy as currently (para.6.15) the evening offer is very limited except for take-aways. As Waltham Forest is the only London Borough without a theatre we are disappointed that Policy WTC4 does not include sui generis uses although this is included in the Glossary (please note your Development Management document has theatres and nightclubs as D2 in Appendix 4 where they should be sui generis for accuracy). Sui generis should be included in Policy WTC4 as it will cover the pubs that have performance spaces in the town centre, and in the future there may be an amateur group who would wish to take over an empty space for performances. Having a town centre theatre doesn't just touch the people who work in it and the people who attend events, it is all those who provide services around it, the restaurants, pubs, programme printers, caterers and taxis etc. Theatre is a vital part of a community and would provide a beacon of vitality	Changes: include sui generis (which is explained in the Glossary) in Policy WTC4 for consistency.	Not specified	Not Specified

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							for your evening economy.			
401992	Mr Shaun Hexter	wtcps9	Section 9 - Paragraph 9.7	Yes	No	Positively prepared	Young couples do not prefer flatted accommodation. That tends to be all that they can afford. Ideally, they would prefer houses, with gardens so that they do not have to move and suffer further costs in order to start families.	Not Specified	Not specified	Not Specified
401992	Mr Shaun Hexter	wtcps8	Section 9 - Paragraph 9.2	Yes	No	Justified; Effective; Not Specified	The biggest problem with the shopping centre plan is that it does not take cognisance of the changing world or retail. Amazon is the elephant in the room - but it is just the biggest. More and more shopping is being done over the internet. We therefore need fewer retail outlets. The AAP should therefore suggest a serious reduction of retail floor space. Whilst many people are happy to window shop (or even go inside and ask questions) and then go home and find the cheapest version on the internet, this will not make the shops themselves much money. This AAP should plan for more retail moving to the internet. More vacant shops will make the area look less appealing to those who do visit. Those shops that do survive will be offering an immediate sale. The buyer will be able to take purchases home straightaway. This means that it must be easy to take them home. Public transport is not usually the best way to do this. The emphasis on getting shoppers into the centre by public transport only works if they are not going to buy much, or certainly if they are not going to take much home. They may request delivery - but only if it is cheap or free. This immediately shows that the planned lack of car parking - free car parking - is a	Consideration of changing shopping patterns with regard to the internet and increased competition from free parking schemes in other shopping centres giving greater access and convenience need to be built into the AAP. Walthamstow High Street as a retail destination is under serious threat. We have had little experiments around the borough which have hinted at the impact. For instance, the introduction of a CPZ north of Wood Street has seriously damaged footfall and hence revenue. The AAP needs to be recast for the retail offering with this in mind. Reducing the size of the retail floorspace, increasing its quality and accessibility are all needed to help address these issues.	Not specified	Not Specified

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							serious threat. Walthamstow's retail offering would have to be seriously good to overcome the competition of free parking in Stratford Westfield, or other sites further afield. This is so serious, that I think that the whole plan for retail does not stack up.			
401992	Mr Shaun Hexter	wtcps7	Section 25 - Opportunity Site 10 - Station Car Park Phase Two	No	No	Positively prepared; Consistent with national policy	The site is ALREADY being built on. This report makes it look like it will be in the future!	Remove section or update to explain.	Not specified	Not Specified
401992	Mr Shaun Hexter	wtcps6	Section 24 - Opportunity Site 9 - Selborne Walk Shopping Centre	No	No	Justified	Removal of green space in an area already devoid of much greenery should not be considered. In addition, overshadowing is not the only issue. The largest south-facing and sunniest part of the whole High Street would be disrupted. It would be far better to replace existing poor buildings than build on this green space.	Not Specified	Not specified	Not Specified
401992	Mr Shaun Hexter	wtcps1	Section 11 - Paragraph 11.6	Yes	No	Not Specified	The gyratory system is in great need of change. I think proposals on this should be subject to a more focused consultation. As stated, it is a key transport blockage, resulting in traffic congestion that is unnecessary, especially at peak times. The width of Hoe Street north of this is an issue. Replacing the buildings on the west side of Hoe Street would be the boldest move and could address other concerns about the quality of the building stock in this "Secondary Shopping Frontage." This would have a positive impact on public transport by opening up further possibilities for the bus station connecting with the north of Hoe Street more directly.	Not Specified	Not specified	Not Specified
401992	Mr Shaun Hexter	wtcps5	Section 10 - Figure 10.2 - Eastern 'Mall Zone of	No	No	Not Specified	This diagram is useless - it is not at all clear what it represents - whereas the one above it is quite clear. The documents are very long - so I hope I	Diagrams need to be checked on the website against the hardcopy document, which	Yes	Life is too short to go through all this online!

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			Potential Extension'				can come back and comment on other bits. Retail space needs to be reduced across the LBWF, and especially here. I have not seen anything about taking shops out of business use and turning them into other uses. This would help address other employment and residential problems.	presumably is correct.		
441261	English Heritage (Nicholas Bishop, Regional Planning Adviser)	wtcps39	Section 12 - Policy WTC10 - High Quality Environment	Not specified	Not specified	Not specified	Thank you for the opportunity to comment on the above documents. As the Government's adviser on the historic environment English Heritage is keen to ensure that the protection of the historic environment is fully taken into account at all stages in the development of the local planning process and we welcome the opportunity to comment on these Area Action Plans (AAP). English Heritage has provided comments on the preferred options drafts and welcomes the several revisions which have been made in light of our response.	Regarding the Walthamstow Town Centre AAP Policy WTC10b: we suggest that this policy be reworded slightly to address "development close to (deleted) which forms the settings of heritage assets (underlined)" for consistency with the National Planning Policy Framework (NPPF). In the supporting text we recommend inserting a reference to English Heritage's Guidance on the Setting of Heritage Assets (2011) which sets out a methodology for identifying impacts on settings.	Not specified	Not Specified
497192	Barclays Bank Plc (Agent: Michael Fearn, Planning Director, Shireconsulting)	wtcps22	Section 10 - Policy WTC3 - Retail	Not specified	Not specified	Not specified	1. Introduction & Background We act as planning consultants for Barclays Bank plc ("the Bank") in respect of monitoring the progress of the emerging 'Development Plan' for the Borough and have previously responded to a number of the Council's Local Development Framework (LDF) consultations, including the 'Core Strategy' and 'Development Management Policies - Proposed Submission Draft', as well as the 'Issues & Options' and	To be found sound the emerging Plan needs to recognise the positive impact that financial service retailers such as the Bank have upon vitality and viability. Any proper review of a 'Development Plan' should provide the opportunity to examine new evidence and to revise out-of-date policy,	Not specified	Not Specified

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							<p>'Preferred Options' versions of this document. The current consultation document, to be part of the Waltham Forest Local Plan (WFLP) still does not adequately address the matters that the Bank has raised and this letter forms the Bank's response to the latest consultation. As a long-established business, the Bank has made a substantial contribution to the vitality and viability of the town centre over the years that it has traded and as a significant stakeholder it is therefore concerned that emerging development plan policies should not fetter that important contribution. Through high attraction of footfall, financial services retailers generally (and the Bank in particular) play a key role in promoting the health of town centres and as a result, the provision of financial services should be allowed to improve and evolve alongside the improvements to shopping provision envisaged over the proposed plan period. Banks should not be subject to outmoded restrictive controls on their location, particularly as this is not supported by Government policy or by any evidence, so there is therefore a need to review existing policies (such as UDP Policy TRL5) that restrict such A2 uses in designated frontages or the Council will risk the WTCAAP being found unsound. 2. The Bank's Representations to date In all of its previous representations to this Council's emerging LDF the Bank we have observed that the Plan's 'Strategic Objectives' recognise the need to secure physical and economic regeneration, facilitate economic growth by meeting the</p>	<p>particularly if it is not consistent with national policy. Continuing with the UDP's restrictive policies designed to keep significant generators of footfall such as the Bank out of primary shopping areas undermines the Council's stated objective of attracting private sector investment in the town centre. The implication that only A1 uses are appropriate derives from very outmoded and discredited thinking that other uses such as banks detract from the vitality and viability of town centres. The Council recognises the urgent need for significant private sector investment in Walthamstow Town Centre, so the opportunity provided by the preparation of one of the main elements of the emerging Local Plan should be used to give greater encouragement to appropriate Part A uses to invest and to improve the quality of their representation. The Bank's evidence of how it increases vitality and viability in primary frontages shows that there is considerable benefit in seeking to attract those A2 users such as banks who provide a high level</p>		

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							<p>demands of businesses, attract and retain high quality services, and strengthen the function of Walthamstow Town Centre as a vibrant and attractive place. The Bank also commented that the WTCAAP's acknowledged need for regeneration and investment in the Town Centre suggests that previous policies in the UDP have not been effective, but that no consideration of whether existing policies needed to be re-examined was given. The Bank stated that existing planning policies and designated frontages needed to be closely examined (based upon robust evidence) and out of date policy reviewed. 3. Review of the Available Evidence Base The 'London Borough Of Waltham Forest - Retail And Leisure Study' of November 2009 by Nathaniel Lichfield & Partners Ltd (NLP) did not attempt any assessment of the various frontage designations and did not consider their definition using up-to-date pedestrian flow, or rental level, evidence. However, amongst Walthamstow Town Centre's various identified "weaknesses" , so said NLP, were its linear form, suggesting that the extensive lengths of frontage designated as being 'primary' are not a benefit to the Centre's vitality. Other 'weaknesses' were the Centre's reliance upon retailers at the "lower and discount end of the market" and a poor quality of environment, particularly in the secondary streets. The main "threat" to the Centre in future was viewed, as the continued downturn leading to possible further increases in vacant premises (page 82). Various surveys of shopper</p>	<p>of investment in their premises, resulting in active and attractive street frontages. This will foster very significant footfall and pedestrian activity and attract investment by others, helping to provide the confidence and commercial viability necessary for any programme of regeneration and investment. The publication of the NPPF signalled a significant change of emphasis in planning for business and the Local Plan must conform to its requirements. To be Justified and Consistent with National Policy, the Waltham Town Centre Area Action Plan should make it clear that uses such as shops, banks and building societies which contribute to the vitality, viability and diversity of town centres will be encouraged and that such active ground floor uses will be appropriate in primary shopping areas without restriction. If this is not done, the Council will risk its plan being found unsound. Policy wording in the WTCAAP should make it clear that financial services retailers such as the Bank are appropriate in all designated shopping</p>		

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							<p>behavior were carried out by NLP in the above study which showed that overall 39% of respondents also visited a bank or building society when on a shopping trip (Question 13 of the Survey) and a number (equivalent to the levels visiting the centre for social/leisure reasons) gave their primary reason for visiting Walthamstow as being to use services such as banking facilities (Table 6.1, page 38). Presumably as a consequence of the Bank's representations 'A Review Of Retail Frontages In Waltham Forest' was carried out by the Council in July 2012, using data from a land use survey in 2010 (one matter the 'Review' noted, at paragraph 9.9, was the 2009 finding of NLP that the provision of banks and financial services was considerably below the national provision at only 8.2% where normally the level is 14.3%). This 'Review' explains that it will assess the levels of non-shop provision within the Borough's various designated frontages "to evaluate the effectiveness of the relevant policies" since the UDP was adopted in 2006 (paragraph 9.15). In the case of Walthamstow's primary frontages (some of which had levels of non-shop use that considerably exceeded the 30% threshold at the time that the Plan was adopted), the overall non-shop frontage amounted to 14% of the frontage length which was unchanged from the 2006 position. On the basis of this 'assessment', it was concluded that the "existing policy/objective for primary frontages have already been achieved" within ten of the fifteen sections of primary</p>	<p>frontages, without restriction. The Bank suggests that the following be incorporated into draft Policy WTC3 relating to the Primary Shopping Frontage stating: 'In order to develop a strong and unique retail town centre in Walthamstow, we will support uses such as shops, banks and building societies which contribute to the vitality, viability and diversity of the town centre. Such active ground floor uses will be appropriate in designated primary frontages.' This will help encourage investment and plan for growth by assisting in the creation of 'a vibrant, attractive and competitive town centre' as envisaged in Strategic Objective 3 of the WTCAAP. We urge the Council not to ignore the Bank's representations and evidence.</p>		

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							<p>frontages (paragraphs 9.17 & 9.18). Paragraph 9.19 goes on to say “given the above outcomes, the current Policy TRL5 in general helps to ensure that A1 (retail) uses predominate on ground floors within the designated primary frontages”. Based upon what the ‘Review’ terms as this “robust evidence” , it then made three recommendations for the emerging development plan documents in respect of Walthamstow Town Centre, one of which was “the current Policy TRL5 requiring not more than 30% of the relevant frontage for non-retail uses should be retained” (paragraphs 9.26, 11.1-11.2). However, the ‘Review’ did not consider the origin of the 30% non-Class A1 threshold, nor did it examine whether all of the primary frontages so designated were worthy of such notation. 4. National Policy And The Bank’s Evidence We set out below the national policy background that necessitates a thorough review of frontage policy if the Council is to produce a Strategy that is sound. The National Planning Policy Framework (NPPF) re-emphasises the requirement for a Development Plan to be ‘sound’ when it is submitted for examination and that in order to be so it must be ‘Positively prepared, Justified, Effective and Consistent with National Policy’. The Government expects the local plan process to consider alternative strategies before deciding upon the most appropriate, that decision being based on evidence to support the choice (paragraph 182). The NPPF is clear that each LPA should ‘ensure that the Local Plan is</p>			

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							<p>based upon adequate, up-to-date and relevant evidence’ and that their assessments and strategies ‘take full account of relevant market and economic signals’ (paragraph 158). On the matter of policy formulation the NPPF states that for plan-making: ‘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’ (paragraph 14). The Government is clear that there should be a positive attitude to ‘proactively drive and support sustainable economic development’ and to ‘respond positively to wider opportunities for growth’. Plans should ‘take account of market signals’ and the needs of business communities (NPPF paragraph 17). Planning should operate to encourage and not act as an impediment to sustainable growth and ‘significant weight should be placed on the need to support economic growth through the planning system’ (paragraph 19). Local Planning Authorities ‘should plan proactively to meet the development needs of business’ (paragraph 20) and ‘Investment in business should not be overburdened by the combined requirements of planning policy expectations’ (paragraph 21). In drawing up Local Plans, local planning authorities should set out a clear economic vision and strategy which ‘positively and proactively’ encourages sustainable economic growth; and should ‘support existing</p>			

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							<p>business sectors, taking account of whether they are expanding or contracting'. The NPPF also confirms that 'Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances' (paragraph 21). The Ministerial Foreword to the NPPF is very clear that 'Development means growth' and that 'Sustainable development is about positive growth, emphasising that 'Planning must be a creative exercise in finding ways to improve the places in which we live our lives'. This reflects HM Treasury's commitment that 'the default answer to development is yes' in its ongoing 'Plan for Growth', which was launched at the time of the Budget in 2011, reinforced in subsequent Budget speeches, and now underpins the NPPF. The wider role played by town centres than a pure shopping function has been recognised throughout Government policy on town centres. Government Policy in the NPPF particularly emphasises the importance of economic growth and the promotion of town centre vitality and viability. Paragraph 23 requires that 'Planning policies should be positive' and states that local planning authorities should 'promote competitive town centres that provide customer choice' and allocate a range of sites because it is important that needs for retail, leisure, office and other main town centre uses 'are met in full'. The clear message is that 'local planning authorities should plan positively for their future to encourage economic activity'. In fact there is</p>			

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							<p>nothing in Government policy that recommends or supports imposing restrictions upon acceptable town centre uses at all and indeed, as noted above, paragraph 21 of the NPPF requires flexibility in policies in order to allow a rapid response to changes in economic circumstances. It is therefore essential that Development Plan policies should facilitate the positive approach required by the NPPF. By definition, uses that fall within Part A of the Use Classes Order are appropriate in town centres as they are 'shopping area uses' and are acceptable without any need for restriction or qualification. This is particularly the case for the financial services sector. ODPM Circular 03/2005 'Changes of Use of Buildings And Land' which accompanied the last major revisions to the Use Classes Order specifically states in relation to the A2 Financial and Professional Services use class (which was created to separate those uses 'serving the public, from other office uses not directly serving the public' - paragraph 32), that the Class is also 'designed to allow flexibility within a sector which is very much a part of the established shopping street scene, and which is expanding and diversifying'. The uses within Class A2 are noted as being those 'which the public now expects to find in shopping areas' (paragraph 38). Promoting vitality and viability in town centres are thus objectives of the Government and the Council. To succeed, town centres need to provide a full range of services and these often need to be located in ground floor premises in</p>			

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							<p>accessible locations. Indeed, Class A2 retailers such as the Bank routinely experience very high levels of customer visitation, contributing significantly towards pedestrian movement and therefore the vitality and viability of town centres. The Bank has undertaken a number of comparative footfall surveys in connection with its current acquisitions programme at its branches in various towns and cities in the UK (copies are attached). These conclusively show that the level of footfall associated with Bank branches is commensurate with, and often higher than, the best known national multiple Class A1 traders. Banks also have long ago moved away from the traditional style of frontage, preferring to have an open, visually interesting and attractive face to the 'high street'. The Bank has become increasingly retail in its presentation and has introduced an innovative 'flagship' branch design, which has been developed in association with its customers, to transform banking into what it terms as 'a retail focused experience'. The Bank estimates that some 10 million customers use its branches each week and through listening to their feedback, a design has been developed that meets their requirements for modern banking and provides branches similar in appearance and in operation to retail shops. This is an example of the 'changes in economic circumstances' that the NPPF recognises and to which all Local Plans must positively and flexibly respond. Whilst the design of every</p>			

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							<p>new branch has to be flexible in order to be sensitive to the requirements of each building occupied, the aim is generally to ensure that over 70% of the internal space at ground floor is accessible to customers. The Bank's footfall surveys have been a key element in helping to change attitudes towards the presence of banks in core shopping areas and primary frontages. Even planning authorities that once strongly resisted Class A2 uses in their primary areas have granted permission for Barclays 'flagship' outlets. Examples of authorities that have recognised the wider benefits of the 'flagship' design (following receipt of applications which have been supported by evidence of high footfall), include Southampton, Reading, Manchester, Milton Keynes, Romford, Southend, Leicester, Plymouth, Sheffield, Kensington & Chelsea and Cambridge. The Bank's managers regularly report that upon the opening of a 'flagship' branch the customer visitation levels significantly increase and thus the level of activity helps to underpin pedestrian flows to the benefit of surrounding traders. It is therefore important that planning policy recognises the benefit of bank uses in fostering footfall and pedestrian activity and that it should not resist much-needed investment by financial service retailers. Follow up surveys were carried out in 2010 at Milton Keynes, Southend, Reading and Southampton (copies are attached). In every case the new 'flagship' branch significantly increased footfall, confirming the Bank's beneficial effect on vitality and</p>			

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							<p>viability. Section 8 of the Proposed Submission AAP sets out the 'Vision and Objectives' for Walthamstow Town Centre and amongst others these include SO1 & 2, which seek the qualitative improvement of the Town's retail offer and SO3 which seeks to create a vibrant, attractive and competitive town centre through encouraging a 'mix of uses' . SO9 seeks to 'diversify and balance' the 'centre's economy in order to create additional jobs' and increase training opportunities. According to paragraph 6.12 three key factors make Walthamstow different from other town centres. Firstly, there are a high proportion of independent retailers offering a range of retail and other services. Secondly, the local community are ethnically and culturally diverse giving vibrancy to the centre. Thirdly, Walthamstow Market offers a distinct shopping experience. Paragraph 10.2 adds a fourth 'Key Factor', the existence of 'unique venue', which offer opportunities to develop a pan London visitor destination and evening economy offer. However, the Town is noted as facing a number of 'challenges', which include its 'under performance' when compared with other neighbouring centres and lack of investment. According to paragraphs 6.14/6.15 'there is a lack of non-retail uses, such as leisure, tourism and cultural uses within the centre' , the 'evening economy' is 'limited' with shops 'often closed by 6pm leaving the centre a deserted and quiet place where people feel unsafe'. Chapter 10 of the WTCAAP (headed 'High Quality Shopping,</p>			

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							<p>Business and Visitor Centre) sets out the Council's objectives, together with its perceived issues and opportunities for regeneration of Walthamstow Town Centre, recognising the need to cater for higher value businesses if vitality and viability is to be improved. Paragraph 10.20 also identifies a lack of certain non-retail uses within the centre currently and the AAP aims to increase the range of non-retail uses in order to make the centre more attractive, add to its vitality and viability, provide additional facilities and services for local people, attract additional visitors and facilitate the development of the evening economy. Providing such uses within the centre will attract more visitors and increase local spend. It will also lead to a more sustainable local economy. The further diversification of the economy will broaden the local economy and range of job opportunities within the centre'. In order to create a 'hub the Council will 'actively encourages' some non-shop uses including Class A2. Yet despite this acknowledgement that uses other than Class A1 shops are necessary to a successful and diverse centre, the Council then states at paragraph 10.19 it 'will continue to maintain a balance of uses within the centre through strong management of the Primary and Secondary Shopping Frontages'. The proposed 'Retail' sector policy is WTC3, which reads 'in order to develop a strong and unique retail town centre in Walthamstow' the Council will develop additional retail floorspace in the Town generally, but there is no attempt to write a policy that could</p>			

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							<p>help to achieve such regeneration initiatives. Continuing policies such as UDP Policy TRL5 which keep significant generators of footfall out of primary frontages will actively work against the achievement of strategic objectives and is inconsistent with national policy. The current UDP's restrictive approach to anything other than A1 uses in primary shopping areas is not explained or justified by reference to sound evidence, and fails to reflect the reality of the important role played by financial services retailers such as the Bank in promoting vitality, underpinning town centres and assisting in regeneration through providing much-needed investment in, and maintenance of, their premises resulting in active and attractive street frontages. The focus should be on the quality of the occupier, not on maintaining an arbitrary percentage level of a particular use class. Given the late stage in the process and the Bank's consistent previous representations on the matter, these omissions call into question the soundness of the document. In view of the requirement for improved provision of banking services in Waltham Forest the Bank confirms its continued interest in the Local Plan process and in that regard we shall be grateful if the Council will continue to notify us of the progress of this AAP as well as details of any other emerging LDDs.</p>			
500040	Mr Philip Herlihy	wtcps13	Section 10 - Figure 10.2 Eastern 'Mall Zone of Potential Extension'	Yes	No	Justified	I've read the Walthamstow Area Action Plan carefully, as it covers (just) the road in which I live and the heart of my home town. With one significant exception, I applaud the plan and its detailed provisions, and	While expansion of the Shopping Precinct is itself a desirable goal for economic reasons, expansion should be sought Westward,	Yes	I'd like to make sure that the inspector hears a considere

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							with that one exception I hope to see all of them implemented. However, I am horrified to see the proposal to build on approximately a quarter of the main open space in the Town Centre. I believe this would seriously and permanently damage the character and amenity of the whole Town Centre. I will be adding further specific comments on this at other relevant parts of this document.	internally (including better use of large areas of service yard which are underutilised) and upwards. The section on proposed encroachment onto the Gardens should be changed to indicate that this is not desirable.		objection to the loss of space from what is now a designated park, from a local resident who uses it daily.
500040	Mr Philip Herlihy	wtcps16	Section 12 - Paragraph 12.15	Yes	No	Justified	I walk in the Gardens accompanied by an elderly dog with short and arthritic legs. I can assure you that the Gardens are not too big for him. The Gardens are not too big. Any reduction in their size would change the character of the space qualitatively, not just quantitatively. The nearest other open space is the small area at the North East end of South Grove, across Selborne Walk from Sainsburys. It is completely different in character, and the size difference is the most significant factor.	Delete this inaccurate assertion.	Yes	I'd like to make sure that the inspector hears a considered objection to the loss of space from what is now a designated park, from a local resident who uses it daily.
500040	Mr Philip Herlihy	wtcps17	Section 13 Figure 13.1 - Access to Nature	Yes	Yes	Not specified	This important figure shows the lack of access to nature in the Town Centre and surrounding area. At present, the Town Square Gardens provide a refreshing open space with a well-chosen variety of trees, and this represents a significant natural facility, which should be protected. Those beautiful locust and maple trees are one of the best natural features for some distance.	Not Specified	Yes	I'd like to make sure that the inspector hears a considered objection to the loss of space from what is now a

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										designated park, from a local resident who uses it daily.
500040	Mr Philip Herlihy	wtcps18	Section 13 - Paragraph 13.9	Yes	Yes	Not specified	This is an important paragraph. If there are to be 2,000 new homes within the Town Centre, then it is all the more important that the open space which the Gardens represent is not diminished. It is the sense of space which gives the Town Square and Gardens the unique quality which the Town Centre currently offers, just as Leyton would be greatly diminished if Coronation Gardens was lost.	Not Specified	Yes	I'd like to make sure that the inspector hears a considered objection to the loss of space from what is now a designated park, from a local resident who uses it daily.
500040	Mr Philip Herlihy	wtcps19	Section 23 - Opportunity Site 8 - Town Square and Gardens	Yes	No	Justified	The Gardens are indeed "reasonably well used", and this could be developed by the provision, for example of picnic tables, which would increase utilisation in conditions where sitting on the grass would be uncomfortable. These Gardens are a precious asset to local people. The Town Centre is some distance from any significant green space, as the figures in the Plan show clearly. These Gardens are of benefit not only to people like me who live locally, but benefit shoppers as an escape from the confines of the shopping precinct and the market, and also benefit the large numbers of commuters who pass on their way to and from the	Not Specified	Yes	I'd like to make sure that the inspector hears a considered objection to the loss of space from what is now a designated park, from a local resident who uses

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							<p>tube and bus stations. I fully support the aspiration of expanding the Mall, but not at the expense of this relatively small and precious open space, whose loss or contraction would certainly be irreversible. Elsewhere in the Plan there is talk of developing and expanding the childrens play area - a very successful and busy facility which is packed with children much of the time (this alone shows the importance of the whole space to families). If the Mall is allowed to expand into the Gardens, then it is clear that the play area would have to be relocated, implying that the loss of space would fall on the present grassy areas. It seems likely that the existing paved area between the play area and the Mall buildings would have to be preserved/relocated, as this currently provides the only vehicular access to the Square for emergency vehicles and to service events and promotions in the Square - on market days it is unfeasible to get a vehicle to the Square any other way. So all the loss of space would have to fall on the grassy and planted areas, which would shrink to a far greater proportion than the diagrams suggest. This would alter the open character of the area, making it more like Leytonstone High Road than the area of Leyton around Coronation Gardens. I believe it would seriously and permanently damage the amenity of Walthamstow Town Centre. If the Mall is to expand - as I hope it can - then expansion should be sought Westward, or vertically. Consideration should also be given to the utilisation of the large service yards. These are</p>			it daily.

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							<p>empty most of the time (with the exception of the one servicing ASDA). I know this well, as before my dog became so arthritic we were allowed to play football together there (by kind permission of Mall staff). Future building design could and should review how to achieve a better balance between space used for service and that for retail purposes. I've long believed that the Mall should expand vertically (as was one of the conclusions of the Prince's Foundation report). The present Plan correctly identifies that the facade of the Mall is lifeless and adds little interest to the space. Additional floors could provide great visual interest in both directions, both by overlooking the Gardens with light and activity, and by providing picture windows onto the Square/Gardens for those inside the building - with suitable attention to safety this would be a very attractive location for a restaurant or bar. Additional floor space could provide the larger overall units that "anchor" retailers seek - at Brent Cross, for example, the John Lewis store is spread over multiple floors and is very successful. Finally, if a review of car parking space shows (as I'd guess) that this is consistently under-used, then expansion could go down as well as up. As suggested in the Plan, roof space could be purposed as public space (with appropriate regard for safety) and this should enhance the attractiveness of the Square/Gardens as an addition, rather than a compensation. As I've indicated at the outset, I warmly applaud every part of this Action Plan except for the</p>			

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							proposal to diminish the Town Square Gardens. This would make Walthamstow a much inferior place to live. WTC10 (h) declares an aim to "Enhance and improve the quality of green spaces throughout the centre". There are few such spaces in the Town Centre, and the others are very small or difficult to access (Cemetery). Please observe WTC13 (a) and "resist the loss of existing social infrastructure" - protect the Town Square Gardens!			
500040	Mr Philip Herlihy	wtcps15	Section 12 - Paragraph 12.8	Yes	Yes	Not specified	The Town Square and Gardens are indeed valued spaces within the centre (and should be protected). They are indeed popular as a place to sit and relax (and this should be developed, rather than reduced by overbuilding, as proposed).	Not Specified	Yes	I'd like to make sure that the inspector hears a considered objection to the loss of space from what is now a designated park, from a local resident who uses it daily.
500040	Mr Philip Herlihy	wtcps14	Section 10 - Paragraph 10.16	Yes	No	Justified	It is stated that the area of the Gardens proposed to be sacrificed for an extension to the shopping precinct is the area least used. I use the gardens daily, and this is not the case. That corner (South-West) is the area most likely to be populated by people in warm weather, and it is the area where the greatest amount of litter is seen. It is at least as well-used as any other part of the Gardens, and I use it daily.	Delete the inaccurate assessment.	Yes	I'd like to make sure that the inspector hears a considered objection to the loss of space from what is now a

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										designated park, from a local resident who uses it daily.
534011	Greater London Authority (Ms Sukhpreet Khull)	wtcps47	Section 1 - Paragraph 1.1	Not specified	No	Not Specified	Statement of general conformity with the London Plan (Planning and Compulsory Act 2004, Section 24 (4) a) Thank you for your letter of 18 March 2013 consulting me on the above document and requesting an opinion on general conformity. On 24 of April 2013 I Edward Lister, Deputy Mayor and Chief of Staff, acting under delegated authority considered a report on this matter, reference PDU/LDF31 /LDDOI /01. This report constitutes my formal representations to the pre- submission consultation. Please note that this includes representations relating to general conformity with the London Plan as well as other representations to clarify or improve policy. As you will be aware, all development plan documents must be in general conformity with the London Plan under section 24 (l) (b) of the Planning and Compulsory Purchase Act 2004. It is my opinion that the submission document is not considered to be in general conformity with the London Plan in relation to density and carparking. Housing and housing density-to optimise the housing capacity and economic potential of individual sites, Transport - car parking reduction in town centre developments In addition there are a number of suggestions put forward in relation to policy matters which require clarification and	Not Specified	Not specified	Not Specified

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							<p>improvement. Consultation on Pre-Submission Document Town & Country Planning Act 1990 (as amended) (TCPA); Greater London Authority Acts 1999 and 2007("GLA Act"); Planning and Compulsory Purchase Act 2004 (as amended) ("PCPA"); Town and Country Planning (Local Development) (England) Regulations 2012 (the Regulations"). Strategic issues The AAP should address the housing density issues raised in the report, together with the recommendation for reduced car parking levels within the town centre to ensure that it is in general conformity with the London Plan overall. It is recognised that various LDF documents address matters collectively, however it is suggested that some form of signposting to all policy references in the various documents are marked in sections where cross references are made. Recommendation That the Mayor agrees to submit the comments set out in this report to Waltham Forest Council as the formal response to the Pre-Submission consultation, and that the Council be advised that the proposed Submission Documents are not in general conformity with the London Plan in relation to the above strategic issues (density and car parking). 1. On 18 March 2013 Waltham Forest Council consulted the Mayor of London on the above Document. This report sets out information for the Mayor's use in deciding what comments to make. The consultation period ends on 29 April 2013. 2. The Local Development Framework together with the Mayor's Spatial</p>			

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							<p>Development Strategy, ("London Plan") and the National Planning Policy Framework ("NPPF") provides the essential framework for planning at the borough level. The "development plan" in London for the purposes of section 38(6) of the Act is: The London Plan (2011), and Development plan documents produced by the borough councils (and saved unitary development plan policies in transitional period). And Neighbourhood Plans as appropriate.</p> <p>3. There are three types of Local Development Documents ("LDDs"); Development Plan Documents (DPDs); Supplementary Planning Documents ("SPDs"); and Statements of Community Involvement. The document now being consulted on is a DPD with development plan status, which will be subject to an examination to test the 'soundness' of the plan. 4. The NPPF states that a plan is "sound" where it is positively prepared, justified, effective and consistent with national policy. The Mayor's role 5. All DPDs must be in general conformity with the London Plan, in accordance with Section 24(1)(b) of the PCPA. Section 24(4) of the PCPA requires boroughs prior to submitting it to the Secretary of State to request the opinion in writing of the Mayor of London as to the general conformity of a DPD with the London Plan and advises that they may request the opinion in writing of the Mayor as to the general conformity of any other LDD. The Mayor issues this opinion on DPD general conformity in accordance with Section 24(5) of the PCPA. Further to this Regulation 18</p>			

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							<p>requires general consultation at the pre-submission stage. By virtue of Regulation 21 (2) of the Regulations the Mayor has 6 weeks from the date of the request to provide his opinion on whether the DPD is in general conformity with the London Plan. 6. Mayor of London's comments will be made available on the GLA website: www.london.gov.uk Previous representations 11. The Mayor made representations on the preferred option consultation stage of the Area Action Plan preparation process on 11 October 2011, (planning report PDU/LDF31 /LDDOI /01), and representations were made by officers under delegated authority to the (Issues and Options) consultation stage on 9 February 2005. A number of the issues that were raised at these stages have been satisfactorily resolved. Proposed representations and current work being undertaken 12. The Waltham Forest Local Development Framework will replace the adopted 1996 Unitary Development Plan. It will set the Council's approach to the planning of the borough up to 2026 and will consist of the Core Strategy, Proposals Map, Development Management Policies document, Site Specific Allocations Document, Area Action Plans and a number of supplementary planning documents. 13. The Council's Core Strategy, adopted March 2012 replaces 145 out of the 158 policies in the London Borough of Waltham Forest Unitary Development Plan. 14. The Development Management Policies (DMP) DPD has an Examination in Public scheduled in for May 2013</p>			

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							along with the Proposals Map. The Council is currently going through Inspector's questions and issues. GLA officers have been informed by the Council that the Inspector has suggested that all the remaining policies not replaced by the Core Strategy should be replaced by the DMP DPD in due course. The Council is therefore attempting to phase out the UDP policies in this manner. 15. Area Action Plans for Walthamstow Town Centre and the Blackhorse Lane Area Action Plan are at Proposed Submission consultation. Preferred Options work for the Wood Street MP is being prepared, however this is not currently out for consultation. 16. The Preferred Options for the Site Specific Allocations DPD is being prepared by the Council at this present time and the Northern Olympic Fringe AAP Preferred Options was consulted on in January 2011 but the Proposed Submission version has not been finalised as yet.			
534011	Greater London Authority (Ms Sukhpreet Khull)	wtcps49	Section 13 - Policy WTC 12 - Decentralised Energy Network	Yes	No	Not Specified	In order to ensure proposals in the Walthamstow Town Centre minimise carbon emissions, the Mayor will: <ul style="list-style-type: none"> a) require all developments of one or more homes or greater than 100 sq.m to be accompanied by an energy assessment that demonstrates: How the resource efficiency, carbon reduction targets and high environmental standards set out in Policy DM11 will be met; and ii. How the proposal will connect to the planned decentralised Energy Network for the Upper Lee Valley (unless this can be demonstrated to be unfeasible or unviable). Where schemes come forward in advance of 	Not Specified	Not specified	Not Specified

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							any Decentralised Energy Network, they should be designed to be 'connection ready'.			
534011	Greater London Authority (Ms Sukhpreet Khull)	wtcps50	Section 11 - Policy WTC6 - Transport Improvements	Yes	No	Not Specified	21. When TfL was last consulted on the Area Action Plan (AAP) preferred options draft in August 2011, various issues were raised in relation to the importance of the bus network and bus station to the area's accessibility, safeguarding of land for transport, the need for further work in appraising options for improving the road network, car parking and planning obligations. Whilst most of these issues have been addressed as part of this proposed submission version, TfL wishes to reiterate the principal considerations for strategic transport at Walthamstow. 23. In respect of the rail improvements outlined at policy WTC6, TfL continues to support the aspiration to develop a pedestrian link between Walthamstow Queens Road and Walthamstow Central station, in line with London Plan policy 6.1. The document would benefit from mentioning that the second entrance at Walthamstow Queens Road station, which is needed for this interchange, is currently under construction. The possible creation of a link between Queens Road and High Street, possibly by a platform extension, is noted, although TfL has had no involvement in this to date. In the 'infrastructure plan' (chapter 35) it is therefore recommended that 'TfL' is added as a partner in the delivery of this link, in addition to Network Rail, given that the station is operated by TfL. TfL is satisfied that other issues previously raised in relation to freight and servicing trips which have not been addressed specifically in this	Not Specified	Not specified	Not Specified

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							AAP, are dealt with elsewhere in the Council's Local Development Framework.			
534011	Greater London Authority (Ms Sukhpreet Khull)	wtcps51	Section 11 - Paragraph 11.7	Yes	No	Not Specified	25. In respect of more general public realm and pedestrian improvements, TfL understands that £120,000 has been granted through the Local Implementation Plan process for initial design work at the town centre's 'Eastern Gateway'. Whilst the document may benefit from providing an overview of how this money might be allocated, the reference made at paragraph 11.7 to the Council's ongoing interest in more substantial 'Major Scheme' funding is supported.	Not Specified	Not specified	Not Specified
534011	Greater London Authority (Ms Sukhpreet Khull)	wtcps52	Section 11 - Paragraph 11.8	Yes	No	Not Specified	In response to TfL's concerns about the protection of the bus station, TfL welcomes the wording in paragraph 11.8 recognising its strategic importance and reinforcing the need for it to be retained. TfL also welcomes the removal of the Courtney Place development site, given the importance of the existing bus stands on the site in maintaining a reliable bus network for north London. The capacity of such facilities is afforded protection through the Mayor's Land for Industry and Transport Supplementary Planning Guidance (November 2012).	Not Specified	Not specified	Not Specified
534011	Greater London Authority (Ms Sukhpreet Khull)	wtcps53	Section 11 - Paragraph 11.6	Yes	No	Not Specified	At paragraph 11.6 (expanding on policy WTC6), TfL welcomes the document's acknowledgement that congestion on Hoe Street and around the bus station remains an issue for accessibility to the town centre. This is of greatest concern to TfL and the proposed wording in relation to simplifying the operation of the Hoe Street gyratory is therefore supported in line with London Plan policies 6.1 and 6.7. TfL also notes the Council's	Not Specified	Not specified	Not Specified

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							intention to improve specific junctions, including at the entrance of the bus station. In these respects, TfL welcomes the Council's commitment to working with TfL and other partners to consider options which improve traffic movements, reduce bus journey times and improve both pedestrian and cycle networks. The removal of the indicative road layout option from this version of the AAP, which TfL previously considered too detailed for a document of this nature, is welcomed. TfL looks forward to working with the Council in appraising and testing various options within the town centre.			
534011	Greater London Authority (Ms Sukhpreet Khull)	wtcps54	Section 11 - Policy WTC7 - Sustainable Transport	Yes	No	Not Specified	Policies WTC6, WTC7 and WTCS, which are the document's principal transport policies, are broadly supported by TfL as they ensure engagement with TfL on improving transport and accessibility in the area and set appropriate requirements on developers in line with London Plan' standards. Specifically, the references added at WTC7 in respect of electric vehicle parking, and the need to improve permeability throughout the town centre, are welcomed, as these were specifically requested at earlier consultation stage. Whilst the car-free approach to residential development is welcomed, TfL continues to encourage specific reference to the need to limit non-residential car parking, particularly for large scale developments such as cinemas, other leisure uses and sports stadia. Whilst the proposed submission draft of the Council's Development Management DPD explains that such proposals will be managed on a case-by-case basis,	Not Specified	Not specified	Not Specified

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							some explanation of how this might be achieved in Walthamstow should be embedded into the AAP, given the existing levels of on-street parking available at present and on-going congestion in the town centre generally.			
534011	Greater London Authority (Ms Sukhpreet Khull)	wtcps48	Section 7 - Paragraph 7.12	Not specified	No	Not Specified	17. As currently drafted Para 7.12 is not in conformity with the London Plan. Walthamstow Town Centre is "Central" in its character setting and has a PTAL rating of 4 to 6, therefore, as set out in table 3.2 of the London Plan, densities ranging from 650-1100hr/ha are appropriate (not 200-700 hr/ha as currently quoted). Town centres will play an increasing important role in meeting the needs of the borough's and London's growing population. As such the Walthamstow Area Action Plan must seek to optimise the housing capacity and economic development potential of individual sites.	Not Specified	Not specified	Not Specified
534011	Greater London Authority (Ms Sukhpreet Khull)	wtcps55	Section 1 - Paragraph 1.1	Yes	No	Not Specified	Legal considerations All LDDs must be in general conformity with the London Plan in accordance with Section 24(1)(b) of the Act. This is a key test of the soundness of plans. The Mayor's representations made at this stage will go forward to the examination in public and must include an opinion regarding general conformity with the London Plan. The fact that a development plan document is inconsistent with one or more policies in the London Plan, either directly or through the omission of a policy or proposal, does not, by itself, mean that the document is not in general conformity. Rather, the test is how significant the inconsistency is from the point of view of delivery of the London Plan. Any expression of	Not Specified	Not specified	Not Specified

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							<p>opinion from the Mayor that the DPD is not in general conformity will be treated as a representation to be dealt with by the Inspector at the examination. The Planning Inspectorate has stated that the view of the Mayor's opinion "will be given considerable weight" and that a lack of general conformity with the London Plan will need to be fully justified on the basis of local circumstances, based on relevant evidence. The Mayor must also state why the policy is not in general conformity and his reasoning behind that opinion. The Inspector will determine whether he or she supports the opinion and recommend accordingly. The Mayor should provide the Inspector conducting the examination with any necessary additional information as appropriate, either through a representative or in writing according to the requirements of the Inspector.</p> <p>Conclusion The Walthamstow Town Centre AAP DPD is supported in its sites proposals, particularly the school extension proposal at Buxton Road. Consideration needs to be given to the housing density figures quoted in the plan to ensure that the development opportunities within the town centre are optimised and of equivalent densities stated in the London Plan. The AAP document should also be strengthened in terms of its vision, growth objectives and its spatial interpretation of how the town centre can exploit its full potential and very high transport accessibility as well as define its role in London and North East London. Subject to the suggested housing and transport changes in relation to car parking</p>			

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							reduction raised in the report, there are no other major strategic concerns with the document. GLA officers would welcome a meeting with Waltham Forest staff to discuss these proposals further to ensure that the AAP is in general conformity with the London Plan before progressing to the Examination in Public.			
537451	Openreach (BT) Repayments Team (Mick Sharp, Repayments Project Engineer)	wtcps44	Section 1 - Paragraph 1.1	Not specified	Not specified	Not specified	From our records, it would appear that ST apparatus exists within the vicinity of these areas and subject to your proposals may require some alteration. Please contact this office when you are in a position to discuss your proposals and how they impact on Open reach Apparatus. It would be helpful if your proposals are divided into smaller work areas.	Not Specified	Not specified	Not Specified
679398	Canal and River Trust (Mrs Claire McLean, Area Planner)	wtcps30	Section 1 - Paragraph 1.1	Not specified	Not specified	Not specified	Thank you for this recent consultation. I can confirm that we have no comments to make on the document.	Not Specified	Not specified	Not Specified
680877	Environment Agency (Miss Eleri Randall, Planning Liaison Officer Environment Agency)	wtcps27	Section 13 - Paragraph 13.17	Not specified	Not specified	Not specified	Thank you for your consultation on the proposed submission of the above Area Action Plan. We are pleased to see that you have taken on board our previous comments and in particular the contents of paragraph 13.17.	We suggest a slight amendment to the sentence which reads as follows: In particular, new development should reduce surface water runoff and green run off rates in accordance with policy 5.13 of the London Plan (2011). To read: In particular, new development should reduce surface water runoff and aim to achieve green run off rates in accordance with policy 5.13 of the London Plan (2011).	Not specified	Not Specified
680877	Environment Agency (Miss)	wtcps28	Section 24 - Opportunity	Yes	Yes	Not specified	We also strongly support the inclusion of support for Green Roofs	Not Specified	Not specified	Not Specified

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	Eleri Randall, Planning Liaison Officer Environment Agency)		Site 9 - Selborne Walk Shopping Centre				in paragraph 13.3 and in Opportunity Site 9 - Selborne Walk Shopping Centre.			
732145	Marine Management Organisation (Angela Atkinson, Stakeholder and Networks Officer)	wtcps21	Section 1 Paragraph 1.1	Not specified	Not specified	Not specified	Thank you for inviting the Marine Management Organisation (MMO) to comment on the above consultation. I can confirm that the MMO has no comments on this document as the geographical area it covers does not include any area of the sea or tidal river and is therefore not within our remit. If you have any questions or need any further information please just let me know. More information on the role of the MMO can be found on our website www.marinemanagement.org.uk	Not Specified	Not specified	Not Specified
746353	Sainsbury's Supermarkets Ltd (Chris Deeks, Assistant Planner, Turley Associates)	wtcps25	Section 26 - Opportunity Site 11 - Sainsbury's Supermarket	Yes	No	Justified	We act on behalf of our client, Sainsbury's Supermarkets Ltd, to make representations to the Proposed Submission for the Walthamstow Town Centre Area Action Plan. We are pleased to see that the Council has identified the Sainsbury's Store at 112 High Street, as a Key Opportunity Site (ref: 11), to allow for the potential redevelopment of the store. Section 26 of the document addresses the Proposal Site and specifies that the Sainsbury's Store is allocated for the following: 'retail led mixed use scheme with residential and social infrastructure'. Sainsbury's support the intensification of this site as a key retail destination within Walthamstow Town Centre and encourage the continued use and occupation of the site as an important retail anchor. It is however considered that the requirement that development should provide smaller scale ground floor	As such, we believe the 'Proposed Use' section (Page 113 of the Walthamstow Town Centre AAP) should simply state: 'retail led scheme, with potential for additional town centre uses' We trust these representations will be taken into consideration as part of the continuing development of the Walthamstow Town Centre Area Action Plan.	Yes	Not Specified

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							units with active frontages prejudices the design process (see page 114 of the Walthamstow Town Centre AAP), and the design and layout of schemes should be considered as part of a pre-application discussion, in light of the scale and type of development coming forward. In terms of the proposed residential element, the Council should remove reference to the number of units, as this is too prescriptive at this early stage. Furthermore, by limiting the provision of retail floorspace between 2,000 and 4,000 sq m this will further restrict the emergence of an acceptable town centre scheme (see page 113 of the Walthamstow Town Centre AAP). Sainsbury's are committed to the long-term investment and redevelopment of the site, and are keen to be involved in the future development plans for Walthamstow Town Centre.			
746353	Sainsbury's Supermarkets Ltd (Chris Deeks, Assistant Planner, Turley Associates)	wtcps26	Section 30 - Opportunity Site 15 - South Grove	Yes	No	Consistent with national policy	Key Opportunity Site 15: South Grove Car Park The Walthamstow Town Centre AAP states that South Grove has the potential for a retail-led mixed use development on this site. It also acknowledges that, by virtue of its location in the designated Walthamstow Major Centre, a superstore or other large footprint use and some residential element would be appropriate. Whilst we acknowledge this site as being suitable for redevelopment purposes, we feel that further definition should be applied. In regards to retail development, the site is edge of centre and therefore both sequential and impact assessment requirements should apply. National Planning Policy Guidance The Key tests for the	Sequential and Impact Assessment Being an edge of centre site, the correct wording in accordance with the NPPF and adopted Core Strategy be applied, in relation to both the sequential and impact assessment requirements. In this regard, we propose that the following paragraph be added at the end of the site context section: In retail terms, the site is edge of centre. Any application needs to satisfy the sequential and impact assessment requirements, in	Yes	Not Specified

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							acceptability for a retail proposal that is edge or out of centre is the sequential assessment and impact assessment. Paragraph 24 of the National Planning Policy Framework (NPPF) states preference should be given to accessible sites that are well connected to the town centre. Moreover, applicants and local authorities should demonstrate flexibility on issues such as format and scale. In regards to the assessment of impact, the South Grove site should include any impact on existing and planned public/private investment and on Walthamstow's town centre vitality and viability, including local consumer choice and trade in the centre (see Paragraph 26 of the NPPF). Local Planning Policy Guidance Policy CS14 within the adopted Core Strategy (March, 2012) on Attractive and Vibrant Town Centres states that new proposals for town centre uses, including retail, should be directed to designated centres through the sequential test, in accordance with the NPPF. Moreover, proposals should ensure that the scale of development is appropriate to both the role and character of Waltham stow Major Centre and its surrounding catchment (see page 143 within the Core Strategy).	accordance with Policy CS 14 of the Core Strategy and the National Planning Policy Framework. Within the proposed land use description, we propose the following amendment: Retail led mixed use scheme including residential. Any application will need to satisfy the sequential assessment and impact assessment requirements. We trust these representations will be taken into consideration as part of the continuing development of the Walthamstow Town Centre Area Action Plan.		
747924	Poldervaart	wtcps4	Section 25 - Opportunity Site 10 - Station Car Park Phase Two	No	No	Not Specified	This is a classic example of 'thin end of the wedge'. Now that you have established, in the teeth of much opposition, that the station area will host an 8 storey block of flats and an even higher hotel block, the local reference point has moved upwards. One of the charms of Walthamstow is its 'liveability' - it does not feel like	Not Specified	No	Not Specified

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							Canary Wharf or other soulless centres - buildings are at a human scale and there are fine views.			
747924	Poldervaart	wtcps3	Section 24 - Opportunity Site 9 - Selborne Walk Shopping Centre	No	No	Not Specified	As before, you are requiring in depth knowledge of planning policy of ordinary residents (or perhaps you don't really want our views ?) and I can't offer any of that. However, I can tell you what I think of these proposals. I believe a much more creative approach to this rather sad and unwelcoming space could be taken. Instead of reducing the area of park, why not massively improve it and create landscaping which turns it into a whole, attractive gateway from Selborne Road. Remove the big screen, which is rarely actively watched in my experience (as opposed to people happening to sit facing it) and use the space and quiet to also make that part much more attractive. A cafe with outdoor seating could be added and you could consider monthly art and craft fairs, for example, to support the local artistic community. This is a valuable piece of open, green space in a heavily urban environment and you should be looking at the whole shopping and travel experience, not just retail space.	Not Specified	No	Not Specified
747924	Poldervaart	wtcps2	Section 19 - Opportunity Site 4 - Tax Office on Corner of Church Hill and Hoe Street	No	No	Not Specified	I have no idea whether the proposal for this site is legally compliant or sound and, as a resident, don't have this kind of knowledge. However, I do not support a new building above 4 storeys - while that may complement the Arcade site proposals, it does not complement any of the surrounding buildings on Hoe St or Stainforth St, nor on Church Hill. The effect of taller buildings in a town centre is to dehumanise it and create wind	Not Specified	No	Not Specified

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							tunnels. The proposal is out of scale with what is already there.			
753667	Mr Robert Lindsay-Smith	wtcps35	Section 10 - Paragraph 10.17	Yes	No	Justified	Larger retail units, in excess of 400 sq.m, who's main or major products are clothing, would compete viciously with the small independent clothing retailers in the market and in the shopping centre. This would put many of the latter out of business, contrary to strategic objective 1 and policy WTC3 (h) and WTC3 (f).	Not Specified	No	Not Specified
753667	Mr Robert Lindsay-Smith	wtcps36	Section 12 - Paragraph 12.14	Yes	No	Justified	It is stated that two frontage on town square and gardens is inactive and unappealing. I reject the arguments, in section 10.7, as a justification for expansion on this area.	The frontage could be more interesting (see paragraph 12.14) by displaying either a permanent mural or a changing sequence of art work.	No	Not Specified
753667	Mr Robert Lindsay-Smith	wtcps37	Section 12 - Paragraph 12.15	Yes	No	Justified; Effective	'It is considered to be too big, poorly articulated, and confusing (sic) laid out.' This is very different opinion to the praise given in April 2006 report on the revitalisation of Walthamstow Town Centre, or in the CABE report which begins, "In Walthamstow, the redeveloped square, gardens and High Street provide a safe and attractive link between the main transport hub and the central shopping area."	Paragraph 12.15 should be deleted as it is totally wrong.	No	Not Specified
753667	Mr Robert Lindsay-Smith	wtcps38	Section 12 - Paragraph 12.16	Yes	No	Justified	As in my previous comments, paragraph 12.15 is founded on false premises. This paragraph is dependent on 12.15 and so is invalid. It is also contrary to the aims: WTC13 (a) 'to resist the loss of existing social infrastructure'. WTC10 (h) 'enhance and improve the quality of green spaces throughout the centre.'	Paragraph 12.16 should read: 'The frontage could be made more interesting (see paragraph 12.14) by displaying either a permanent mural, or a changing sequence of art work.'	No	Not Specified
760701	London Underground Limited (Shahina Inayathusein,	wtcps24	Section 1 - Paragraph 1.1	Not specified	Not specified	Not specified	We have no comments to make at this stage except that London Underground Infrastructure Protection need to be consulted as Statutory Consultees on any planning	Not Specified	Not specified	Not Specified

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	Information Manager)						application within 50 metres of the railway. Where there are intended works in the Highway we would need to be notified of these so that we can ensure there is no damage to them.			
760705	Highways Agency (Ms Felicity Drewett)	wtcps23	Section 1 - Paragraph 1.1	Not specified	Not specified	Not specified	Thank you for your letter of 18 March 2013 inviting final comments from the Highways Agency regarding the above Area Action Plans (AAPs) for Blackhorse Lane and Walthamstow Town Centre. The Highways Agency (HA) is an executive Agency of the Department for Transport (DfT). We are responsible for operating, maintaining and improving England's strategic road network (SRN) on behalf of the Secretary of State for Transport. It is unlikely that there would be a material impact on the SRN from any proposed development in the AAPs, therefore we have no further comments to make at this final stage of consultation.	Not Specified	No	Not Specified
763275	Morrisons (Agent: Mr Anthony Ferguson, Senior Associate, Peacock and Smith)	wtcps20	Section 30 - Opportunity Site 15 - South Grove	Not specified	No	Justified; Effective; Consistent with national policy	Our client, South Grove Regeneration Walthamstow Limited (a subsidiary of Wm Morrison Supermarkets plc), has emerging proposals for 'Opportunity Site 15 - South Grove', which have been informed by an extensive period of pre-application consultation and scheme formulation in partnership with Council officers, Greater London Authority, CABE, stakeholders and members of the public. In this context, these representations carry significant weight. Our client endorses the Council's vision for a mixed-use (retail and residential) redevelopment scheme on this site, but strongly challenges and objects to the draft site allocation on the grounds it is overly prescriptive and does not allow sufficient flexibility to ensure deliverability and viability. As	We suggest that the following text (highlighted in red) below should be incorporated/deleted/amended: Site Area - 1.30 Ha Current Use - Car Park Planning History - No recent planning history Context The [insert: under-utilised] South Grove site is bounded by the Chingford to Liverpool Street railway line to the north, South Grove to the south and east, and Brunner Road to the west. The site is currently the location of the South Grove car and lorry parks, disused public toilets, the Alpha Business Centre	No	Not Specified

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							<p>such, it will put undue additional risk on the delivery and viability of the proposed development. This, in turn, poses a significant threat to potential new investment, regeneration and job creation in Walthamstow town centre at a time of economic recession and uncertainty. National Planning Policy Framework The National Planning Policy Framework (NPPF) explains at paragraph 182 that it is the responsibility of the local planning authority to submit a plan for examination which is 'sound' on the following grounds: * positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements.... and consistent with achieving sustainable development; * justified - the plan should be the most appropriate strategy, when considered against reasonable alternatives, based on proportionate evidence; * effective - the plan should be deliverable over its period....; and * consistent with national policy - the plan should enable the delivery of sustainable development in accordance with the policies in the Framework. The NPPF explains at paragraph 173 that, 'Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be</p>	<p>and some Council owned general industrial units. The site is within five minutes walking distance of St James Street and Queens Road Stations and is within 10 minutes walking distance of Walthamstow Central stations providing access to the tube, bus and rail networks. The immediate area is generally a mix of [insert: retail], office, storage, general industrial and residential uses, with building heights ranging from 2 - 4 storeys. It edges two of the 'break through' points along the Chingford to Liverpool Street railway line. PTAL - The site has a PTAL of 4 Proposed Land Use - Retail led mixed use scheme including residential Retail Floorspace - 5,000 - 7,000 sq.m [replace with: 5,000 - 10,000 sq m net] Number of Units: 90 - 250 [replace with: up to 300] Site Issues and Opportunities Anchor Store [Insert: The mixed-use scheme should be food superstore-led to anchor the retail element] Activity Where proposals include a superstore/foodstore or [replace with: and] other large footprint uses, care should be taken to ensure</p>		

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							<p>applied to developmentshould, when taking into account of the normal cost of development and mitigation, provide competitive returns to a willing landowner and willing developer to enable the development to be deliverable'. In short, the NPPF clearly explains that the Walthamstow Town Centre Area Action Plan must be deliverable over its life span if it is to be considered sound. Sites and the scale of development should not be subject to policy restraints that their ability to be developed viably is threatened. These considerations are material to the plan-making process and we believe they are compelling. As it stands, the draft wording in 'Opportunity Site 15 - South Grove' is 'unsound' in its current form, because the delivery and viability of the site is threatened having regard to the advice in the NPPF.</p>	<p>development makes a positive contribution to the street by minimising blank walls and service areas that create 'dead' frontages. Proposals should seek to achieve active edges/frontages along South Grove to bring vitality to the street and increase natural surveillance. Edges can also be 'softened' through the use of landscaping. Linkages This site is important to the regeneration of the western end of the High Street. Development must therefore seek to reinforce, improve and where possible create linkages between this site and the High Street and St James Street Station, in particular for pedestrians and cyclists. Building Heights Proposed building heights should range between 3 and 7 storeys [replace with: not exceed 12 storeys from ground floor level.] The site plan below shows approximate locations for these heights, however these may need to be adjusted to meet overlooking and separation distances. Nature of Residential Development should seek to provide a satisfactory and usable level of amenity space,</p>		

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								<p>particularly for family accommodation. The Council may accept some flexibility on the overall level of provision given the site's central location, although the emphasis should be on its quality and usability. Traffic Management Highway capacity frequently reaches a maximum on Markhouse Road on weekday mornings and along Willow Walk on Saturdays, so traffic management, including deliveries to the retail units and management of both customer and residential car movement is seen as a challenge to the development of the site. A Transport Assessment, Travel Plan, Delivery and Servicing Plan and a parking management strategy will therefore be required with any application. The Council will seek improvements to town centre routes and junctions, particularly Willow Walk and Selborne Road junction. Existing Trees There are a number of trees just outside the site that are worthy of retention (the London Planes along South Grove and the trees on the railway line to the back of the site). Proposals should</p>		

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								[insert: where necessary,] seek to retain these trees and provide a methodology for any changes within the Root Protection Area. Archaeological Priority Zone (APZ) The site lies within the Walthamstow APZ which is the site of a medieval settlement. A preliminary site evaluation may therefore be required before development proposals are considered.		
763374	Natural England (Miss Francesca Barker, Planning Advisor)	wtcps29	Section 13 - Policy WTC14 - Access to Sites of Nature Conservation	No	No	Consistent with national policy	All designated habitats and sites should be defined on the proposals map and detailed in the Local Plan documents. In addition, the plan should include criteria based policies for protected biodiversity and geodiversity sites, distinguishing between international, national and local sites (NPPF Para 118).	Natural England welcomes Policy WTC-14 Access to Sites of Nature Conservation. Walthamstow Wetlands is designated as a Site of Special Scientific Interest (under Walthamstow Reservoirs), a Special Protection Area and RAMSAR (the latter two as part of the wider Lee Valley SPA and RAMSAR). It should therefore be clearly stated that this site is of international (and not just local) importance to nature conservation. We also agree with the Sustainability Appraisal in that this policy should clearly specify that any increase in access should not lead to detrimental effects in terms of biodiversity, and should make reference to the need to protect the	No	Not Specified

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								condition of the Wetlands alongside creating, improving and enhancing links to sites of nature conservation importance, in accordance with the Lee Valley Regional Park Management Plan.		
763442	Sustrans (Ms Francesca Leadlay, Policy Advisor)	wtcps40	Section 11- Policy WTC7 - Sustainable Transport	Not specified	Not specified	Not specified	We urge that provision of high quality, safe routes for pedestrians and cyclists is improved. Measures to establish pedestrian and cycle links between key transport interchanges will reduce severance and improve connectivity for pedestrians and cyclists. We support the proposed interventions to address the current conflict around the Walthamstow Central station, Hoe Street/High Street, Hoe Street/Selborne Road junctions and Palmerston Road/St. James Street. As outlined in the Area Action Plan, pedestrians, buses and other motor vehicles converge at these points, which are major gateways for most people travelling into the centre. We welcome the strategic objectives, particularly Strategic Objective 6 – 'Creating a more sustainable centre by encouraging sustainable forms of transport such as walking and cycling, incorporating the highest levels of sustainable design in new development and establishing a decentralised energy network(s) within the centre'. Given that during the duration of the Area Action Plan there will be a significant increase in the number of people living, working, shopping and visiting the centre, we recommend that all efforts are made to implement schemes that reduce reliance on car use while promoting	Not Specified	Not specified	Not Specified

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							<p>walking and cycling. This will address local traffic issues such as congestion. Investing in these schemes will contribute to Waltham Forest's sustainable development goals by facilitating many more local cycling journeys which collectively have a positive impact on the environment and public health. Enhancement projects will help to promote walking and cycling for both short and long trips in and around the Borough. We welcome the plans to improve the pedestrian and cycling environment on Hoe Street, including improving specified pedestrian crossings, and introducing a range of traffic calming measures to improve road safety. We advocate for the implementation of traffic calming measures including a default 20 mph speed limit zone in the town centre, which is one of Sustrans' key policy objectives. A London Assembly Transport Committee investigation found that 20 mph limits had made an important impact on London's road casualty rate and offered potential to increase levels of walking and cycling. There is strong evidence for the safety, health and economic benefits. A recent British Medical Journal study showed that the introduction of 20 mph zones was associated with 42% fewer road casualties. Younger children were the main beneficiaries in this reduction in casualty numbers, and serious injuries and fatalities also dropped significantly. (BMJ, 2009, Effect of 20 mph traffic speed zones on road injuries in London, 1986-2006: controlled interrupted time series analysis). According to Transport for</p>			

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							London, London's 20mph zones are already estimated to be saving the city more than Â£20 million every year by preventing crashes (London Assembly Transport Committee (2009), Braking Point).			
763442	Sustrans (Ms Francesca Leadlay, Policy Advisor)	wtcps41	Section 12 - Policy WTC9 - Design and Place Making	Not specified	Not specified	Not specified	In relation to design and place making, we urge that improvements are made to the urban realm and improving provision for cyclists and pedestrians to both improve the safety and appeal of the environment and encourage people to walk and cycle for more of their everyday journeys. We support improvements to wayfinding and linking to surrounding areas including Lloyd Park, the Walthamstow Wetlands and Walthamstow Village.	Not Specified	Not specified	Not Specified
763442	Sustrans (Ms Francesca Leadlay, Policy Advisor)	wtcps42	Section 35 - Paragraph 35.2	Not specified	Not specified	Not specified	Seeks funds raised by the upcoming Community Infrastructure Levy to be spent on improving accessibility and connectivity for pedestrians and cyclists throughout Walthamstow. All new developments should incorporate adequate provision for cycling and walking, including the installation of secure cycle parking facilities.	Not Specified	Not specified	Not Specified



Waltham Forest

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