

**Local Development Framework
Core Strategy Issues and Options
Schedule of comments received via letter/email**

Full Name	Organisation	Response ID	Theme	Consultation Point	Consultee's Comments/Summary
Alun Evans of CGMS (Agent)	Metropolitan Police Authority	csio5179	Healthy Environment	Issue 8.4	Support Option C
Alun Evans of CGMS (Agent)	Metropolitan Police Authority	csio5180	Safe and inclusive neighbourhoods	Issue 9.1	Support Option A and C
Alun Evans of CGMS (Agent)	Metropolitan Police Authority	csio5178	Centres you want to go to	Issue 7.2	Support for options A & B in recognition of the need to ensure the traditional retail function of the town centre is maintained and promoted.
Alun Evans of CGMS (Agent)	Metropolitan Police Authority	csio5177	Investing in our economy	Issue 5.3	Support for Option A.
Alun Evans of CGMS (Agent)	Metropolitan Police Authority	csio5176	Improving housing quality and choice	Issue 4.8	Option D supported.
Alun Evans of CGMS (Agent)	Metropolitan Police Authority	csio5175	Improving housing quality and choice	Issue 4.4	Shortage of suitable, available residential accommodation for young police officers. Need a quantum of intermediate housing for key workers including police officers maximised. Support therefore for option A which provides a 50:50 split of social and intermediate housing.
Alun Evans of CGMS (Agent)	Metropolitan Police Authority	csio5174	Improving housing quality and choice	Issue 4.3	Support Option B as this is consistent with the London Plan.
Alun Evans of CGMS (Agent)	Metropolitan Police Authority	csio5173	Improving housing quality and choice	Issue 4.2	Support for option C.
Alun Evans of CGMS (Agent)	Metropolitan Police Authority	csio5172	Improving housing quality and choice	Issue 4.1	Support for options A & B.
Adina Brown	English Heritage	csio5187	Protecting and Improving our places	Paragraph 3.5	Pleased that the historic environment has been identified in paragraph 3.5 as part of what makes Waltham Forest distinctive, including some non designated assets, Conservation Areas and Archaeology Priority Zones. In addition to those already listed we would recommend that nationally and locally Listed Buildings and their setting are included, as well as parks, gardens and landscapes of heritage value, which help define the Boroughs local distinctiveness.

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Adina Brown	English Heritage	csio5193	Protecting and Improving our places	Issue 3.4	Improving access to the historic environment is also considered in any Options taken forward. Improving the accessibility of heritage assets, spaces and areas can also add value/ improve public enjoyment of exiting sites, both in terms of intellectual access and physical access to the site itself. For example, the historic environment and history of the area can be highlighted through interpretation and improved access in riverside walks, public spaces and parks. English Heritage has published guidance to help improve accessibility to historic buildings and landscapes (already referenced above).
Adina Brown	English Heritage	csio5201	Travelling efficiently between places	Issue 10.1	In relation to Issue 10.1 (sustainable transport) English Heritage fully supports a switch to less damaging forms of transport, as increasing levels of traffic are gradually eroding the quality of the historic environment, directly through construction of new infrastructure, but also indirectly through traffic blight. We recommend the emerging LDF core strategy should seek to raise the profile of Borough's historic streets and spaces to promote walking and cycling. It is also important the LDF recognises the importance of heritage assets in contributing to the character of streets and public spaces. This includes assets that are key features within the public realm (i.e. street furniture such as historic railings, lights and seats etc), spaces that are of special character (i.e. registered parks and gardens) and assets that relate to the street and other public spaces (i.e. the setting of assets such as listed buildings). Well designed, well ordered and well maintained streets are an expression of a confident and caring community.

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Adina Brown	English Heritage	csio5201	Travelling efficiently between places	Issue 10.1	English Heritage's streetscape manual, Streets for All, set out the principles for street management – such as reducing clutter, co-ordinating design and reinforcing local character . Well designed, well ordered and well maintained streets are an expression of a confident and caring community. English Heritage's streetscape manual, Streets for All, set out the principles for street management – such as reducing clutter, co-ordinating design and reinforcing local character
Adina Brown	English Heritage	csio5200	Safe and Inclusive Neighbourhoods	Issue 9.1	Options should consider its impact on the historic environment, as well as identifying any opportunities for improvement, such as refurbishing a run down historic park or building that has become a focus for anti-social behaviour.
Adina Brown	English Heritage	csio5199	Healthy Environment	Issue 8.2	Open spaces, parks, gardens and landscapes can have heritage and cultural value as well and maintenance of this is also important for increasing the recreational value of the Boroughs open space. For example 'Green Heritage Sites' are assessed by looking at conservation and restoration standards, such as repairs, maintenance, use of the right materials to conserve historic character and if there have been restorations or re-creations of valued historic features
Adina Brown	English Heritage	csio5198	Centres you want to go to	Chapter 7	The historic environment needs to be given more consideration when LB of Waltham Forest develops its preferred options for Issues 7.1, 7.2, 7.3 and 7.4. Although English Heritage welcomes re-investment in the fabric of our town centres, including buildings and the public realm, and greater footfall to support existing retailers. There is also a risk of increasing homogeneity of town centres, the loss of historic buildings and street layouts to accommodate larger and simpler footprints. The emerging LDF core strategy should ensure a 'balanced approach' to town centre development in Waltham Forest, which recognises the contribution of the historic environment to the economic, social and environmental well-being of the area.

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Adina Brown	English Heritage	csio5198	Centres you want to go to	Chapter 7	It should also be recognised that heritage assets and the wider historic environment can, when sensitively used, help regenerate and retain the distinctiveness of an area. Changes to these sensitive locations must first consider how the centre has developed, so as to inform how they can each be developed in the future. It is also important to consider the relationship of these centres to the surroundings they seek to serve. English Heritage has produced guidance on retail development available at http://www.helm.org.uk/upload/pdf/Retail_Development_in_Historic_Areas.pdf
Adina Brown	English Heritage	csio5197	Centres you want to go to	Chapter 7	In the introduction it would be helpful to acknowledge the historic value of the Boroughs town centres and the relationship between the cultural and physical character of these centres, and the commercial activity they accommodate.
Adina Brown	English Heritage	csio5196	Improving housing quality and choice	Issue 4.8	The emerging LDF core strategy should seek to promote good design principles and this should be applied when proposing new homes. All successful design solutions depend on allowing time for a thorough site analysis and careful character appraisal of the context (including the historic environment). It is important to consider the historic environment in relation to Option C as well as new builds. Many historic buildings actually perform well in terms of energy efficiency; however it can also be possible to achieve greater energy efficiency and environmental performance in historic buildings, as long as the interventions proposed work with their character, construction, and materials.

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Adina Brown	English Heritage	csio5195	Improving housing quality and choice	Issue 4.1	Encourage re-use and adaptation of heritage assets into residential use where appropriate, as opposed to wasteful demolition. You will probably be aware that the London Development Agency and English Partnerships are currently updating the National Land Use Database in London, supported by a Good Practice Guide and Action Plan. This should provide of LB of Waltham Forest with useful data on Brownfield sites and we are currently working with the LDA to ensure data on the historic environment is incorporated in this database. It is also worth mentioning the Mayors Targeted Funding Stream, which includes priority for a bid that "brings a building listed with English Heritage back into use" to improve the condition and use of existing properties for housing (Bidding Prospectus 2008:22).
Adina Brown	English Heritage	csio5194	Protecting and Improving our places	Issue 3.5	Waltham Forest may wish to consider polices for existing developments within flood risk zones (in addition to where new development takes place). The historic environment should be a consideration in the Options developed, both the potential to protect heritage assets that may be vulnerable, but also to avoid or mitigate any damage that could be caused through flood risk prevention (to archaeology or the setting of listed buildings for example).
Adina Brown	English Heritage	csio5202	Travelling efficiently between places	Issue 10.3	When transport schemes are developed, its impact on the historic environment needs to be fully assessed, to avoid or mitigate any adverse effects, and to ensure a high standard of design in any new development
Adina Brown	English Heritage	csio5192	Protecting and Improving our places	Issue 3.3	It is worth bearing in mind that a number of open spaces, woodlands, heaths etc have heritage value. For example Epping Forest is a historic managed landscape and this could be particularly relevant to option C 'improved management'.

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Adina Brown	English Heritage	csio5191	Protecting and Improving our places	Option 3.2	Option A is not sufficient and indeed would be a real missed opportunity for the Borough. Protecting and improving places requires proactive steps to understand the heritage value of places, and once an assessment has been undertaken, to judge how heritage values are vulnerable to change, and what actions can be taken to sustain, reveal and reinforce those values. Whether this be tackling buildings at risk (such as the Grade II* former Granada Cinema on Hoe Street), drawing up management plans for maintenance of the Councils own historic assets (such as the William Morris gallery, Vestry Museum, Town Hall etc), or improving access/ understanding of key heritage attractions, for example. We would certainly support Option D 'additional designations', and our only concern with Options B and C are that they are focused on statutorily designated assets (not including local listed buildings for example) and 'protection' focused without the important 'enhancement' aspects that local communities value.
Adina Brown	English Heritage	csio5190	Protecting and Improving our places	Issue 3.2	Suggest the heading to be amended to 'well protected and enhanced heritage assets', as by including the term 'built' this excludes archaeology and parks, gardens and landscapes of heritage value. English Heritage also recommends that the description of this issue is amended to reflect the full range of assets (not just Conservation areas and Listed Buildings). For example, historic buildings, areas and their setting; historic parks and gardens; archaeology; heritage landscapes and the wider historic environment, such as those elements that may not be statutorily protected, yet help define the Boroughs local distinctiveness. The last sentence is highly reactionary and there are many values that need to be considered when managing change, which do not necessary need to conflict. This sentence could be replaced with 'LB of Waltham Forest should manage change, in a way that sustains, reveals or reinforces places of cultural heritage value'. The source for this is English Heritage Conservation Principles (source referenced above)

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Adina Brown	English Heritage	csio5203	Doing our bit for the environment	Issue 11.1	LB of Waltham Forest may wish to consider existing buildings that have heritage value in relation to these options. Although the introduction of micro renewable energy may cause demonstrable harm to the historic environment, this can be mitigated through careful consideration of their design, location and overall impacts.
Adina Brown	English Heritage	csio5188	Protecting and Improving our places	Paragraph 3.6	In paragraph 3.6 the 'Waltham Forest Character Assessment/ Urban Design Study' has been identified as a key study to develop the evidence base of the LDF policies. Strongly recommend that the historic environment is incorporated into this study through historic characterisation / historic area assessment. In-house conservation staff would be able to advise you on this, as well as the Greater London Sites and Monuments Record (already referenced above) and the relevant English Heritage Historic Buildings and Areas Advisor. Note that an Open Space Strategy and Strategic Flood Risk Assessment are to be undertaken and we look forward to being consulted on these.
Adina Brown	English Heritage	csio5185	Protecting and Improving our places	Chapter 3	Ideally, proposed changes will cause no harm to any heritage values.
Adina Brown	English Heritage	csio5186	Protecting and Improving our places	Paragraph 3.2	In paragraph 3.2 it would be helpful to include 'enhancement' of the historic environment as well as 'protection' which is already usefully included.
Adina Brown	English Heritage	csio5184	Protecting and Improving our places	Chapter 3	Options for achieving the objective of proposed change will have different impacts on values. The predicted consequences of proposals on each of the identified heritage values of a place, and thus on the significance of the whole, should provide the reasoned basis for a decision, where necessary taking other interests into account. Change can be neutral or beneficial in its effect on heritage values. It is only harmful if (and to the extent that) significance is eroded.
Adina Brown	English Heritage	csio5182	Our Spatial Vision	Chapter 2	LB of Waltham Forest will need to compare the predicted effects of alternative courses of action on the values of a place, in order to identify the optimum solution.

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Adina Brown	English Heritage	csio5181	Our Spatial Vision	Chapter 2	<p>The 'brief history of Waltham Forest' does not acknowledge the deeper history in the Borough or the tangible remains of that history which is still evident, shaping many of the places we see today. For example many of the Boroughs centres are in fact historic centres of Saxon or Medieval origins. LB of Waltham Forest should consider how the historic environment can underpin the wider vision for the area and its priorities, for example how enhancement of heritage assets/ areas can help maintain the Boroughs character (para 2.12); contribute to regeneration of the area (para 2.17); create a high quality local environment; and, improve the quality of local centres (para 2.18). English Heritage recommends further thought is given to how the historic environment can contribute to local distinctiveness and that this is incorporated in the spatial vision for LB of Waltham Forest's emerging LDF Core Strategy.</p>
Adina Brown	English Heritage	csio5189	Protecting and Improving our places	Issue 3.1	<p>Encourage LB of Waltham forest to consider guidance published by both English Heritage and CABE on good design in historic contexts when developing the preferred options. Endorse use of the revised (July 2007) English Heritage/CABE Tall Buildings Guidance to help inform policy formulation. It should be noted that this guidance is endorsed by Government as capable of being a material consideration in planning applications. Stress that, Option D 'modern and futuristic designs' will not in itself encourage good design that will have a positive environmental impact. All successful design solutions depend on allowing time for a thorough site analysis and careful character appraisal of the context. Similarly, Option E 'environmentally sustainable features' should ensure the introduction of micro renewable energy and other measures does not cause demonstrable harm to the historic environment and that careful consideration is given to their design, location and overall impacts (including on setting).</p>

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Adina Brown	English Heritage	csio5183	Protecting and Improving our places	Chapter 3	The heritage case should be put fully and robustly to compare the impacts on the significance of a place of the suggested options. The option that either eliminates, or (as far as is possible) mitigates harm should be selected.
Alec Arrol	Kennet Properties	csio5090	Protecting and improving our places	Issue 3.1	Overall borough wide urban design strategy could identify areas where development should be in line with the existing environment, and other areas where development may want to be modern and futuristic.
Alec Arrol	Kennet Properties	csio5091	Protecting and improving our places	Issue 3.1	Masterplans may be deemed acceptable to establish the urban design value of the site to provide developers with an understanding of the appropriate requirements of the site.
Alec Arrol	Kennet Properties	csio5092	Protecting and improving our places	Issue 3.3	Some sites which are designated Green Belt, but are actually being used for industrial or low scale employment uses, such as along Lea Bridge Road, should be considered for larger, and potentially more beneficial, development.
Alec Arrol	Kennet Properties	csio5093	Protecting and improving our places	Issue 3.5	Option A will not maximise the use of previously developed land and will therefore put pressure on the remaining land assets. A mixture of options B, C and D should be pursued.
Alec Arrol	Kennet Properties	csio5094	Improving housing quality and choice	Issue 4.1	In identifying potential housing sites there must be a priority in redeveloping Brownfield sites.
Alec Arrol	Kennet Properties	csio5095	Investing in our economy	Issue 5.3	Non-designated employment land should be released for redevelopment purposes.
Alec Arrol	Kennet Properties	csio5096	Healthy Environment	Issue 8.2	Any designation of open space should seek to reflect the social and environmental value of the site.
Alex Savine	Olympic Development Agency	csio5105	Healthy Environment	Chapter 8	Greater emphasis should be put on the opportunities for sporting legacy and the opportunity for formal and informal recreation. Reference to the Legacy Masterplan Framework in the Core Strategy would be beneficial.
Andrew Holloway of DPP (Agent)	Hadley Homes	csio5102	Investing in our economy	Issue 5.3	All allocated and non-allocated sites should be reviewed to identify they are still required for employment and aren't more valuable providing different uses, so that regeneration areas can be more successful.

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Andrew Holloway of DPP (Agent)	Hadley Homes	csio5103	Travelling efficiently between places	Issue 10.2	Managing demand for travel may be achieved by encouraging mixed use development in regeneration areas. Often within areas appropriate for regeneration transport needs are neglected. Ultimately inward investment that can be secured by large scale development should be utilised to improve less accessible areas, rather than consolidate infrastructure town centres.
Andrew Holloway of DPP (Agent)	Hadley Homes	csio5101	Improving housing quality and choice	Issue 4.5	Affordable housing locations on-site should be addressed with flexibility in order to ensure that practical issues of construction and management are considered. Off-site provision should be allowed.
Andrew Holloway of DPP (Agent)	Hadley Homes	csio5100	Improving housing quality and choice	Issue 4.2	Certain sites that have been previously developed will require more investment for redevelopment than others, and therefore the development would want to develop the highest and best use in order to be viable. A scheme that seeks to increase the number of family homes and therefore restrict the density of development on out-of-centre sites will compromise the regeneration of previously developed sites.
Arthur Vickery		csio5134	Making the most of our Education	Chapter 6	New schools, new community leisure facilities etc
Arthur Vickery		csio5135	Healthy Environment	Chapter 8	There is a need for a community centre in Highams Park
Ataa Amo	East Thames Group	csio5155	Travelling efficiently between places	Chapter 10	Section 106s can be used to improve public transport links if they are poor. Where possible we will build developments that are car free and will look to include car clubs in developments where they are deemed viable. Waltham Forest currently has no car clubs so they should look into developing these.
Ataa Amo	East Thames Group	csio5159	Doing our bit for the environment	Chapter 11	Planners should also encourage, through the planning development processes, developers to adopt climate change adaptation and mitigation measures, (these measures should be evidenced as part of any planning approval process).

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Ataa Amo	East Thames Group	csio5148	Centres you want to go to	Chapter 7	Town Centres: Support for independent shops as well as larger chains. Need to ensure each town centre has a distinct local identity supported by a strong local business sector and avoid town centres becoming either downmarket or upmarket clones of other town centres. Sometimes town centres can become dominated by cheaper end high street chains with no thought to variety but equally can become gentrified and dominated by upmarket coffee shop chains and expensive boutiques.
Ataa Amo	East Thames Group	csio5147	Improving housing quality and choice	Chapter 4	There should be a strong link between new housing and the existing community so new developments are meaningful and well-integrated and improve the quality of life for everyone. There should be more master planning around individual areas (e.g. The Drive in Walthamstow) with a longer term strategy rather than a piecemeal approach.
Ataa Amo	East Thames Group	csio5146	Improving housing quality and choice	Chapter 4	New homes should go on Brownfield sites and involve mixed tenure communities. They should avoid being built over allotment sites (of which LBWF has quite a few) as these are becoming more important and popular as the environment is pushed up the national agenda. New housing estates should be designed to high environmental spec with creative well designed public amenity space.
Ataa Amo	East Thames Group	csio5145	Centres you want to go to	Chapter 7	No cinema in Waltham Forest- would be good to have a bigger cinema and also an art-house cinema which could showcase local talent as well as international films.
Ataa Amo	East Thames Group	csio5144	Healthy Environment	Chapter 8	Playing fields at Marsh Lane in Leyton are overgrown and could do with a complete refurbishment.

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Ataa Amo	East Thames Group	csio5149	Healthy Environment	Chapter 8	Personal development - WF residents who have been unemployed for several years will benefit from a range of personal development workshops, goal setting and information, advice and guidance sessions. Residents need help to plot their short-term and long-term aspirations. Along side this service residents will need confidence building and personal development, communication workshops and team building activities to get residents to gel with fellow learners and feel part of a new experience. EP's Open Doors programme does all of this and more.
Ataa Amo	East Thames Group	csio5156	Travelling efficiently between places	Chapter 10	They could look at congestion charging and higher parking costs to deter people from using cars to access the town centre. The money could then be ring fenced to improve public transport.
Ataa Amo	East Thames Group	csio5150	Healthy Environment	Chapter 8	Routes to Work - EPs work experience and business mentoring programme. There are high levels of unemployment in WF and often residents have little or no qualifications, so work experience provides residents with a chance to try out different careers before job searching, it's also a great reference on a CV.
Ataa Amo	East Thames Group	csio5143	Healthy Environment	Chapter 8	New Community facilities- particularly needed on 'The Drive' estate in Walthamstow where we are planning to build some new homes in conjunction with the borough (LBWF garage sites) Particularly would be good to have employment link in these areas.
Ataa Amo	East Thames Group	csio5151	Healthy Environment	Chapter 8	Basic skills support - Adult literacy and numeric is a big national problem. Without basic skills very few jobs are really available to residents. This needs to be an integral service to WF residents, leading to accreditation and qualifications.
Ataa Amo	East Thames Group	csio5152	Healthy Environment	Chapter 8	Other employability programmes - As well as Routes to Work packages, residents will benefit from whole suite of employability programmes - interview techniques, presentation skills, C.V writing, business etiquette.

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Ataa Amo	East Thames Group	csio5153	Healthy Environment	Chapter 8	Construction training centre - this is planned for Cathall road and could be an excellent facility for local people to get into the construction industry. The centre should also have classroom space with ICT facilities to enable the wider employability skills to take place onsite.
Ataa Amo	East Thames Group	csio5154	Travelling efficiently between places	Chapter 10	East Thames currently is rolling out an estate wide travel plan for some of its existing sites, we would aim to look at all transport options for new developments in Waltham Forest and take into account the PTAL scores of areas that we intend to develop in WF. WF should be encouraged to develop personalised travel plans for its residents and promote public transport - real time information at bus stops etc.
Ataa Amo	East Thames Group	csio5158	Improving housing quality and choice	Chapter 4	All RSL's are now required to build to a minimum of Code for Sustainable Homes Level 3, which helps to address a number of sustainability issues including the impact of housing on climate change. UK Housing contributes towards 27% of the UK's CO2 emissions so it is important to ensure that all new housing is built to the highest energy efficiency standards possible. The LA should ensure that it positively promotes the Governments policies on climate change through the LDF framework to private sector developers as well as housing associations, which will improve standards of housing in Walthamstow, help to combat fuel poverty, and assist in growing the supply chain for sustainable materials, and for construction skills.

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Ataa Amo	East Thames Group	csio5158	Improving housing quality and choice	Chapter 4	This should include for instance ensuring that PPS25 on development and flooding is followed and implemented at the local level. Planners should encourage the provision of renewable energy only after developers have considered the Mayors hierarchy in relation to energy; that is reduce the onsite demand for energy first by maximising energy efficiency measures to the fabric of homes, then look to use decentralised forms of energy and finally to ensure that at least 20% of the remaining demand for energy comes from renewables. Planner should also encourage developers to carry out Low or Zero carbon appraisals on all of there sites submitted for planning approval.
Ataa Amo	East Thames Group	csio5157	Travelling efficiently between places	Chapter 10	By 2010, all schools should have travel plans so WF should look at a holistic school travel approach. They could look towards the Surrey County Council model of Pegasus -a school bus similar to the traditional school buses of America.

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Candice Beard	Environment Agency	csio5169	Doing our bit for the environment	Option 11.2	<p>Option A is not good enough to ensure that development is constructed in a sustainable way. Support the incorporation of sustainable drainage systems, green roofs and water retention methods in developments as mentioned in option B. To support this key theme like to see an indicator regarding the Code for Sustainable Homes/BREEAM.</p> <p>All new development should achieve high standards of sustainability</p> <p>Residential development should as a minimum achieve Code for Sustainable Homes Level 4 and aspire to meet level 5 or 6. All government funded housing sites are expected to exceed this level by 2010 and reach Code level 6 by 2013.</p> <p>Non-residential development should meet the BREEAM excellent rating.</p> <p>Building to a high level of the Code for Sustainable Homes and BREEAM will assist in the demonstration in the high standards of design and sustainability. Many exemplar developments are now making a commitment to build to code level 6. This is achievable on development of this scale through the use of community heating systems and rainwater harvesting.</p> <p>Developments should be designed to:</p> <ul style="list-style-type: none"> · enable reuse and recycling at least 90% of demolition and construction waste · have a recycled content of at least 30%
Candice Beard	Environment Agency	csio5171	Reduce, re-use and recycle waste	Chapter 12	<p>The NLWS sets the framework by which waste will be managed, including schemes to reduce the amount of waste produced and increase the amount that is recycled both through procurement of their own waste management contract and partnership working. The Core Strategy does not give consideration to how development can contribute to the achievement of the objective of the NLWS.</p>

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Candice Beard	Environment Agency	csio5171	Reduce, re-use and recycle waste	Chapter 12	<p>Wish to see consideration of policies which influence the design of homes, buildings and public spaces so as to facilitate recycling. This is particularly important in high density developments for example medium and high rise buildings, where the design can influence the ease with which residents can recycle. Good design which makes recycling easy will increase participation amongst occupiers and result in high material capture rates. There are various collection systems on the market, including automated waste collection systems which tend to be more suitable for deployment where developments consist of around 1,000 units plus.</p> <p>The Core Strategy also makes no reference to the use of recycled materials or materials with recycled content in the construction of new properties. Where contaminated land is encountered we would wish to see this treated for reuse, rather than disposed of.</p>
Candice Beard	Environment Agency	csio5168	Doing our bit for the environment	Paragraph 11.6	Individuals, businesses and institutions will also have to change their behaviours in relation to water use.
Candice Beard	Environment Agency	csio5166	Healthy Environment	Option 8.2	Support options A, B, C, E and F. In particular, we support the approach offered by option F to use planning obligations to help pay for recreation and green space facilities.

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Candice Beard	Environment Agency	csio5165	Doing our bit for the environment	Chapter 11	<p>Climate Change Adaptation In this chapter like to see a specific climate change adaptation option included. Note that there are a few references to climate change in a number of chapters but it is important to focus on this as an individual issue. There are clear benefits for the environment, people and the economy.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> · An assessment should be made of the likely changes in climate anticipated over the lifetime of development. · A climate change adaptation plan should be implemented. <p>Climate change adaptation plans should consider both existing and proposed development. They should identify how the above objectives will be met through new development and also through a programme of retrofitting existing development. The plans should consider the means of funding and implementing the climate change adaptation measures.</p> <ul style="list-style-type: none"> · Development should be designed for anticipated climate change. <p>When designing development proposals, the existing physical constraints and local effects of climate change over the lifetime of development should be taken into account.</p>
Candice Beard	Environment Agency	csio5164	Protecting and improving our places	Option 3.5	<p>The Strategic Flood Risk Assessment (SFRA) must be used to inform the Core Strategy, Site Allocations Document and other LDF documents. The SFRA must also be used to apply the Sequential Test, as outlined in PPS25. If having applied the Sequential Test there are site allocations that are still proposed in flood risk areas then a Level 2 SFRA will be required. Option A states that redevelopment proposals in medium to high flood risk zones should be completely avoided but is this possible in this Borough? We support the more balanced approach put forward in option B. It is worded in line with PPS25 and presents a less restrictive option for the Borough.</p>

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Candice Beard	Environment Agency	csio5164	Protecting and improving our places	Option 3.5	The concept of both options C and D should also be incorporated in the final option. Option B could be built upon to also include the requirement for sustainable drainage systems as part of all new developments and the need for the Exception Test (including a Flood Risk Assessment) being passed after the Sequential Test. The Thames Region Catchment Flood Management Plan has recently been completed. Its policy messages should be incorporated into the Core Strategy. With regards to Sustainable Drainage Systems, you should ensure the policies outlined in the revised London Plan are included in the LDF documents - namely policy 4 A.14.
Candice Beard	Environment Agency	csio5163	Protecting and improving our places	Option 3.3	Support the inclusion of options A, B and C. All three options should be combined to form one option. Biodiversity must be protected, created and enhanced. For example, this can be done through the sustainable design of developments, incorporating green and brown roofs, providing vegetated natural buffer strips along waterways etc.
Candice Beard	Environment Agency	csio5162	Protecting and improving our places	Issue 3.3	There is a lot of focus on protecting the existing biodiversity within the borough, which is great, but there needs to be more on enhancing biodiversity within the borough.
Candice Beard	Environment Agency	csio5161	Protecting and improving our places	Option 3.1	Support the overall principle of option E. However, it is limited by including features. We feel it would be better to amend the wording to incorporate environmentally sustainable principle e.g. use water efficiently, reduce flood risk, waste is managed sustainably, energy resource efficiency, habitat creation etc which may use the features listed such as, wind turbine and green roofs. A further option which could be included in this section is to design buildings to adapt to and mitigate climate change.

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Candice Beard	Environment Agency	csio5160	Healthy Environment	Chapter 8	We welcome the fact that the following: Waltham Forest Open Space Strategy (due to be completed by autumn 2008) and North London Strategic Flood Risk Assessment (to be completed summer 2008) are being undertaken and will inform the development of the LDF policies. The following two studies could also be reviewed and used to inform the LDF policies: · "Nature Conservation In Waltham Forest- Ecology Handbook 1" · "Waltham Forest HAP"
Candice Beard	Environment Agency	csio5170	Reduce, re-use and recycle waste	Chapter 12	The Borough of Waltham Forest will obtain the majority of its water requirements (either domestic and/or commercial needs) from underground Chalk aquifer boreholes and/or the River Lee. We have published a Catchment Abstraction Management Strategy (CAMS) for London, which considers the availability of water for abstraction purposes. This document is available on our web-site www.environment-agency.gov.uk/cams The Lower River Lee (between Fieldes Weir and Lee Bridge) has been identified as a stretch of watercourse that is under considerable stress due to the current volumes of water being abstracted (mainly for public water supply purposes). Resources within our underground aquifers along the Lee Valley are also heavily abstracted for the same purpose. These resources have to be carefully managed to maintain the integrity of the aquifer. Our policies in this regard are supported by the publication of the London Basin Chalk Aquifer 2008 report. This places limits on the quantities of water that can be abstracted from the Chalk aquifer.

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Candice Beard	Environment Agency	csio5170	Reduce, re-use and recycle waste	Chapter 12	<p>These documents demonstrate why there is a need to adopt policies to ensure water resources are managed sensible and wisely. Increasing demand (e.g. Londoner's use of domestic water supplies are above the national average) will continue to place the environment under great strain. Water efficiency should be a key component of sustainable development and construction and you need to be 'proactive' in setting policies and requiring developers to submit data to demonstrate how they intend to meet water efficiency targets. These measures can include innovative water saving options, rainwater harvesting, and recycling technologies to be incorporated within the overall development. Equally, policies can be adopted to deal with single and small scale developments including modifications to the remaining property to upgrade it to the current standards on water efficiency. The Major of London has stated that the London Boroughs should apply a maximum water use target of 105 litres per head per day for residential developments in line with the Code of Sustainable Homes. This needs to be stated.</p>
Candice Beard	Environment Agency	csio5167	Healthy Environment	Issue 8.3	<p>Contaminated land is identified as an environment risk. This chapter, however, primarily only addresses the environmental risk of contaminated land from the perspective of the impact on human health. The impacts of contaminated land are wider than this. As such, it would be more appropriate for this issue to be included in Chapter 11 Doing our bit for the environment. In this section the wider impact of contaminated land on the environment and biodiversity can be further addressed. Support the wording of Option 8.3 A, Continue to oppose developments that would pose an unacceptable risk to the quality of groundwater or would have a detrimental effect upon the quality of surface water but feel it would be better placed in a different section. PPS23 states that land contamination is a material planning consideration and is required to be assessed for all developments, particularly where there is the potential for contamination. Planning Applications will be objected to in the absence of a preliminary risk assessment.</p>

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Carolyn Wilson of Mono Consultants Limited (Agent)	Mobile Operators Association	csio5274	Investing in our economy	Chapter 5	Do not have any specific issues or options for inclusion for the Council's Core Strategy, would take this opportunity to comment that we consider it important that there remains in place a telecommunications policy within the emerging LDF. PPG8 gives clear guidance, stating that local plans should set out criteria based policies to guide telecommunications development and that whilst regard should be had to siting and design considerations, operational efficiency should not be inhibited.
Christopher Baker	Government Office for London - North East London Planning	csio5139	Introduction	Chapter 1	There are some options which perhaps should not be included as policy options. Example: 3.1 (page 19) where one option (c) is to prepare masterplans. It is not clear what having a proposal in one plan to prepare another plan would achieve other than to provide a link to a subsidiary AAP or SPD.
Christopher Baker	Government Office for London - North East London Planning	csio5142	Travelling efficiently between places	Option 10.3	Suggest lobbying for the re-investment of the Hall farm Curve as part of improved links between Chingford and Stratford. Given that the Core Strategy is a delivery document, this should only be retained in the final Plan if there is support from the Network Rail and TfL such that there is some prospect in it occurring in the lifetime of the plan.
Christopher Baker	Government Office for London - North East London Planning	csio5136	Introduction	Chapter 1	The document is generally well laid out and strikes a good balance between enough detail to inform consulters and not being too complicated so as to confuse readers unfamiliar with the planning process.
Christopher Baker	Government Office for London - North East London Planning	csio5138	Introduction	Chapter 1	Some of the set options remain confusing in terms of the connection between the heading and the optional actions: for example in Issue 5.3, the main question has somewhat tenuous links to some of the options such as D. Thus there may be problems with the responses received.
Christopher Baker	Government Office for London - North East London Planning	csio5140	Improving housing quality and choice	Option 4.6	Some options imply a choice that does not exist. Asks consulters whether Council should provide Lifetime Homes and Wheelchair housing when the London Plan (policy 3.5) states that all should be to Lifetime Housing standards and 10% should be wheelchair accessible. This should be indicated in the preamble of the option.

Full Name	Organisation	Response ID	Theme	Consultation Point	Consultee's Comments/Summary
Christopher Baker	Government Office for London - North East London Planning	csio5141	Centres you want to go to	Option 7.1	Some options imply a choice that does not exist. Suggests the possible elevation of centres, including walthamstow to a metropolitan centre. This potentially conflicts with the London Plan, which sets out the framework for the key retail centres and advises on the process for reclassification (para 3.270). In practice, it may well be unrealistic to suggest Walthamstow's elevation to a metropolitan centre given its proximity to the new metropolitan centre at Stratford.
Christopher Baker	Government Office for London - North East London Planning	csio5137	Introduction	Chapter 1	There is potential for confusion through the options listed under each heading. It is not always clear whether the options are being offered as a list of alternatives or a range of possible actions, some or all of which could be taken forward. In option 4.1 for example options A, B and C are confusing. The question posed could itself stand on its own as a possible approach and the three options then offered could be taken as alternative ways forward or simply three elements of the councils approach of responders support the various options. In some cases it seems the selected options could be mutually exclusive. In analysing responses and moving towards a list of draft policy options, it will be necessary to take account of how consulters have understood the options if the policies are to be a true reflection of the responses received.

Full Name	Organisation	Response ID	Theme	Consultation Point	Consultee's Comments/Summary
Claire McAlister	British Waterways London	csio5216	Doing our bit for the environment	Chapter 11	<p>The waterways can provide opportunities to address all of the options in this chapter, by facilitating the following sustainability measures in the design and construction of waterside developments:</p> <ul style="list-style-type: none"> Waterborne freight transport for transporting demolition and construction waste, construction materials, household and commercial waste & recyclates and other low value, bulky, non time sensitive goods and products; · Sustainable urban drainage systems (SUDS); · The maximisation of 'grey water' instead of valuable fresh water resources; and · The use of the canal water source for heating/ cooling systems (factsheet attached for more info). <p>These measures help ensure the earth's natural resources are maximised and recycled to make development more sustainable, improve energy efficiency, reduce carbon emissions and conserve fresh water. BW therefore believes the LDF should ensure that developers are required to consider the feasibility of these sustainable options for development within reasonable proximity to the River Lee Navigation.</p>
Claire McAlister	British Waterways London	csio5205	Protecting and Improving our places	Issue 3.2	<p>Under paragraph D: Additional designations, BW wishes to ensure that new designations such as conservation areas, do not place an inappropriate constraint on the waterways and prejudice the delivery of enhanced transport and sustainability aims.</p>

Full Name	Organisation	Response ID	Theme	Consultation Point	Consultee's Comments/Summary
Claire McAlister	British Waterways London	csio5204	Protecting and Improving our places	Issue 3.1	British Waterways supports the aim of paragraph A, regarding the integration of new developments with the local context. Encourage the incorporation of any adjacent waterside in the design of new development, to maximise the benefits of this unique asset and improve the waterside environment. With regards to paragraph E: Environmentally sustainable features in addition to the methods mentioned, the waterways can facilitate the following sustainability measures in the design and construction of waterside developments: 1 Waterborne freight transport for transporting demolition and construction waste, construction materials, household and commercial waste & recyclates and other low value, bulky, non time sensitive goods and products; 2 Sustainable urban drainage systems (SUDS);
Claire McAlister	British Waterways London	csio5204	Protecting and Improving our places	Issue 3.1	3 The maximisation of 'grey water' instead of valuable fresh water resources; and 4 The use of the canal water source for heating/ cooling systems (factsheet attached for more info). These measures help ensure the earth's natural resources are maximised and recycled to make development more sustainable, improve energy efficiency, reduce carbon emissions and conserve fresh water. Believes the LDF should ensure that developers are required to consider the feasibility of these sustainable options for development within reasonable proximity to the River Lee Navigation.
Claire McAlister	British Waterways London	csio5206	Protecting and Improving our places	Issue 3.3	The Consolidated London Plan (2008) seeks to ensure that development plan documents have regard to the economic and social as well as environmental benefits of green infrastructure assets and protect assets of regional significance for the retention, provision and enhancement of green infrastructure, including the Lee Valley Regional Park. The River Lee Navigation is a valuable corridor for wildlife adjoining Waltham Forest, and is a Site of Metropolitan Importance for Nature Conservation.

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Claire McAlister	British Waterways London	csio5217	Reduce, re-use and recycle waste	Chapter 12	British Waterways is keen to get involved with the public consultation on site options for waste facilities in Waltham Forest. As referred to in Chapter 10 above, BW is promoting the use of the canals for the movement of freight, especially for waste. We are already involved in a few operations currently underway.
Claire McAlister	British Waterways London	csio5215	Travelling efficiently between places	Chapter 10	Waterborne transport (of passengers and in particular freight) has a role to play as a viable alternative to road transport. The LDF should therefore give recognition to the role of the canal network for reducing traffic congestion, improving air quality and providing alternative non-car modes of transport through waterborne transport.
Claire McAlister	British Waterways London	csio5214	Safe and Inclusive Neighbourhoods	Chapter 9	BW published 'Under Lock & Quay' in 2000 jointly with the Metropolitan Police to help deliver safe and secure waterside development and uses and to design out crime and anti-social behaviour.
Claire McAlister	British Waterways London	csio5213	Healthy Environment	Issue 8.3	Option A - Water quality is an issue that BW is concerned about along the Lee Navigation, and is making moves towards improving.
Claire McAlister	British Waterways London	csio5212	Healthy Environment	Chapter 8	The canal towpath can be used to support walking and cycling as forms of active travel between destinations e.g. commuting, and should be utilised to assist in the achievement of Option 8.1 B: to encourage healthier lifestyles, by safeguarding the network of pedestrian /cycling routes. BW therefore seeks improvements to the towpath itself (including signage and interpretation and measures such as CCTV, lighting, graffiti removal, towpath resurfacing, landscaping and street furniture) and access to the towpath in the vicinity of a new development as types of on-site transport measures and facilities in order to encourage use of towpath for walking etc.
Claire McAlister	British Waterways London	csio5211	Healthy Environment	Chapter 8	BW believes it has a role to plan in the achievement of Issues 8.1: Promoting physical activity, 8.2: Open spaces for recreation and 8.4: Access to social and community facilities, by way of encouraging walking and cycling, and also providing opportunities for leisure activities.

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Claire McAlister	British Waterways London	csio5210	Making the most of our Education	Issue 6.1 to 6.3	In response to options B: Access to nearby supporting facilities and 6.3 A: Setting up multi-purpose facilities and services, we believe that the waterways have an important role to play as an education resource in the local and wider community. BW employs a Learning Services Manager to work with local schools and the community to assist in the awareness and promotion of the historical, environmental, social, sustainable and economic role of the inland waterways within modern life.
Claire McAlister	British Waterways London	csio5209	Investing in our economy	Chapter 5	Promote the use of business barges in certain locations to provide affordable, high quality, business accommodation that is ideal for SMEs and attractive to creative and high-tech industries such as graphic designers, ICT
Claire McAlister	British Waterways London	csio5208	Improving housing quality and choice	Chapter 4	Please note that the Mayor's draft Housing Strategy identifies residential moorings as an alternative housing type. The moorings can provide a more affordable type of accommodation that add life and colour to the waterways.
Claire McAlister	British Waterways London	csio5207	Protecting and Improving our places	Issue 3.5	BW would support option D regarding sustainable drainage systems. The River Lee Navigation can accept surface water subject to water management capacity issues and providing the water quality of the discharge is equal to or better than the water quality of the receiving section of waterway.
Claire McAlister	British Waterways London	csio5218	Protecting and improving our places	Chapter 3	BW would encourage the redevelopment of Essex Wharf for residential or mixed-use development and looks forward to working closely with future developers and the local planning authority to achieve a high quality development that fully embraces the site's waterside location. It will though be necessary for the Council and/or any future developer to carry out a wharf assessment to ensure that the site no longer has any potential for the viable commercial handling of freight by water.
Daniel Osbourne of Drivers Jonas (Agent)	North East London NHS Foundation Trust	csio5011	Improving housing quality and choice	Option 4.1	Affordable housing contributions should be identified on a site by site basis to determine the viability of the range of obligations options. However, the target of 35-50% seems to provide the most flexibility.

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Daniel Osbourne of Drivers Jonas (Agent)	North East London NHS Foundation Trust	csio5012	Healthy Environment	Option 8.4	Support the re-provision of new healthcare facilities as well as support the redevelopment of redundant healthcare sites, in particular the Thorpe Coombe Hospital, Naseberry Site and the Langthorne Site. These three sites would both be appropriate for residential uses.
Daniel Osbourne of Drivers Jonas (Agent)	North East London NHS Foundation Trust	csio5010	Improving housing quality and choice	Option 4.1	Supports Option A which seeks to make use of existing sites.
Daniel Osbourne of Drivers Jonas (Agent)	North East London NHS Foundation Trust	csio5009	Improving housing quality and choice	Option 4.1	The council will need to plan proactively to meet housing targets. Due to changes in PPS12, local authorities can now include strategic site allocations in their Core Strategies. This could benefit the council and developers.
Georgie Cook	Thames Water Utilities Limited	csio5097	Protecting and Improving our places	Issue 3.5	TWUL supports use of well maintained SUDS and the inclusion of Flood Risk in the Core Strategy.
Georgie Cook	Thames Water Utilities Limited	csio5098	Healthy Environment	Issue 8.3	Strongly support the inclusion of Option A. Additional text to be added: Planning permission will only be granted for developments which increase the demand for off-site service infrastructure where: 1. Sufficient capacity already exists or 2. Extra capacity can be provided in time to serve the development which will ensure that the environment and amenities of local residents are not adversely affected. When there is a capacity problem and improvements in off-site infrastructure are not programmed, planning permission will only be granted where the developer funds appropriate improvements which will be completed prior to occupation of the development. See letter for further supporting text to be added to the Core Strategy.
Georgie Cook	Thames Water Utilities Limited	csio5099	Improving housing quality and choice	Chapter 4	Thames Water would welcome the chance to work closely with council to understand the impact proposed development will have on the capacity of the system.

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Giles Dolphin	Greater London Authority	csio5070	Doing our bit for the environment	Issue 11.2	Option C - GLA recommends that the Council considers the following measures in relation to sustainable construction: aspects of sustainable design and construction for example those covered by the code for sustainable homes, as well as measures to reduce overheating; mixed nature of much of the development in London and that the reducing of CO2 required the use of mixed development not just homes; difficult to reach level 6 of the code for sustainable homes, the council may therefore identify a number of sites where they expect zero carbon footprint; Core Strategy should have regard for increasing water efficiency using London Plan Policy 4A.16 on water supplies and resources.
Giles Dolphin	Greater London Authority	csio5065	Protecting and improving our places	Issue 3.5	Council's strategic flood risk assessment should develop policies in the area of the impacts of climate change, such of flooding etc, on the economically worse off parts of the population.
Giles Dolphin	Greater London Authority	csio5066	Investing in our economy	Issue 5.2	Option C - section relating to higher environmental standards states there is a tradeoff between environmental and social issues. Win- win opportunities should be maximised.
Giles Dolphin	Greater London Authority	csio5083	Travelling efficiently between places	Chapter 10	Omission - need to ensure sufficient land for an expanded transport system. Chapter 10 should include a general policy on this subject, safeguarding land for transport functions.
Giles Dolphin	Greater London Authority	csio5067	Doing our bit for the environment	Issue 11.3	London specific carbon dioxide emission reduction targets are not referenced. 60% reduction is emissions by 2025 and 25% of energy produced by decentralised sources by that date. (The London Plan sets a 30% emissions reduction target).

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Giles Dolphin	Greater London Authority	csio5069	Doing our bit for the environment	Chapter 11	Explanation of the requirements for an energy assessment could be included in the Core Strategy. Other elements which could be included in this chapter include: developments avoiding internal overheating and excessive heat generation (which may require energy intensive cooling); passive solar design; natural ventilation; vegetation on buildings and ensuring designs make the most of natural systems both within and around the building.
Giles Dolphin	Greater London Authority	csio5071	Doing our bit for the environment	Issue 11.3	Energy efficiency measures strongly supported.
Giles Dolphin	Greater London Authority	csio5072	Improving housing quality and choice	Chapter 4	Council should consider whether they need to include policies in the Core Strategy or other supplementary documents to ensure that it has the information required to carry out the monitoring required.
Giles Dolphin	Greater London Authority	csio5068	Doing our bit for the environment	Issue 11.4	Council should reflect the national and regional targets based on local evidence and sets a carbon emissions target. Council's Core strategy should also reflect the renewable energy targets are contained within the London Plan (Table 4A.1). This should enable the provision of renewable energy by identifying the need for land (where this occurs) and locations in development briefs and area development frameworks.
Giles Dolphin	Greater London Authority	csio5073	Improving housing quality and choice	Option 4.8	Text on the subject of good layout and safety and security should be expanded to include acknowledgement of pedestrian desire lines, permeability, legible site layouts, crossing facilities, gradients, footway quality and shared surfaces/treatments for mobility impaired and safety and security including frontages.
Giles Dolphin	Greater London Authority	csio5064	Improving housing quality and choice	Issue 4.8	References to 'social trade offs' are misleading.
Giles Dolphin	Greater London Authority	csio5078	Travelling efficiently between places	Issue 10.2 and 10.3	TfL wishes to emphasise that most of the option (A,B, C etc) in Options 10.2 and 10.3 are not either/or options, and would all be required a sustainable transport strategy.

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Giles Dolphin	Greater London Authority	csio5063	Doing our bit for the environment	Chapter 11	Lack of a reference to heat demand and a strategic plan to identify opportunities for decentralised heating like district heating networks. All Boroughs should ensure DPDs address the need for decentralised energy to power heating and cooling systems. Council Character Survey should be an opportunity for the council to develop an evidence base for energy policies.
Giles Dolphin	Greater London Authority	csio5081	Travelling efficiently between places	Chapter 10	TfL suggests that Chapter 10 should have a policy regarding planning obligations including the need to collect planning obligations for public transport
Giles Dolphin	Greater London Authority	csio5062	Doing our bit for the environment	Chapter 11	Of particular concern is the lack of reference to London Plan Policies 4A.6 and 4A.5, these require a strategic approach to heating and cooling and cannot be applied on a site by site basis. As it stands the Core Strategy is not in accordance with the London Plan.
Giles Dolphin	Greater London Authority	csio5080	Travelling efficiently between places	Issue 10.2	The core strategy should clarify that irrespective of which option is pursued high density and large scale development should be carefully planned and located where PTAL values are high.
Giles Dolphin	Greater London Authority	csio5061	Doing our bit for the environment	Chapter 11	Policy 4A.1 should be treated as the overall Climate Change policy, objective to minimise carbon dioxide through the hierarchy should be included in the document.
Giles Dolphin	Greater London Authority	csio5060	Doing our bit for the environment	Chapter 11	Document does not take into account the London Plan Energy Hierachy as set out in London Plan Policy 4A.1 and over-emphasises London Plan Policy 4A.7 on renewable energy. The latter is the last thing on the Energy Hierachy and the document should reflect this.
Giles Dolphin	Greater London Authority	csio5059	Healthy Environment	Issue 8.4	All options supported provided there is a robust set of supporting evidence. Policies 6A.4 and 6A.5 pursue planning obligations to pay for social and community needs.
Giles Dolphin	Greater London Authority	csio5082	Travelling efficiently between places	Chapter 10	TfL notes that Option 10.3 D refers to enhancing the road network, in this respect Core Strategy should comply with London Plan policy 3C.16 (road scheme proposals).
Giles Dolphin	Greater London Authority	csio5058	Healthy Environment	Issue 8.2	Any approach to the re-provision of open space on alternative sites should be consistent with paragraph 3.307 of the London Plan and ensure thee is no net loss.

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Giles Dolphin	Greater London Authority	csio5030	Improving housing quality and choice	Issue 4.5	Options B and C accord with London Plan policy 3A.10. Reference should be made to paragraphs 3.55 - 3.58 of the London Plan. Option A would not be in general conformity with the London Plan.
Giles Dolphin	Greater London Authority	csio5028	Improving housing quality and choice	Issue 4.3	The document does not mention anything about the loss of housing and affordable housing in line with policy 3A.15 of the London Plan.
Giles Dolphin	Greater London Authority	csio5027	Improving housing quality and choice	Issue 4.3	When setting affordable housing targets council should have a regard for policy 3A.9 of the London Plan, whereby the target should be based on an assessment of all housing needs and a realistic assessment of supply. Maximum reasonable amount should be sought when negotiating a scheme.
Giles Dolphin	Greater London Authority	csio5026	Improving housing quality and choice	Issue 4.2	Council should refer to policy 3A.5 of the London Plan, which requires Council to identify full range of housing choices.
Giles Dolphin	Greater London Authority	csio5025	Improving housing quality and choice	Issue 4.1	GLA welcome the commitment to meeting London Plan targets. It is recognised these are minimum targets. Option A should conform with Policy 3A.3 of the London Plan. Option B should build on open space and will not be in general conformity with the London Plan.
Giles Dolphin	Greater London Authority	csio5024	Protecting and improving our places	Chapter 3	River restoration is recommended The Ching, especially the western part of its route through the Council and most of the length of the Dagenham Brook. LDF should acknowledge this and respond to these needs.
Giles Dolphin	Greater London Authority	csio5084	Travelling efficiently between places	Chapter 10	Omission - TfL suggests there be a general policy on freight and servicing.
Giles Dolphin	Greater London Authority	csio5076	Travelling efficiently between places	Chapter 10	Should include a clear overarching transport policy that guides transport aspects of development. Core Strategy should link to detailed transport policies which have development plan status, covering: cycling, walking and public transport; Transport Assessment and Travel Plans; car parking; car pooling/car clubs; freight issues including delivery and servicing issues.
Giles Dolphin	Greater London Authority	csio5038	Investing in our economy	Issue 5.2	The North Sub-Regional Development Framework states there are opportunities to move freight by a sustainable transport mode which could be used for specified cargoes.

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Giles Dolphin	Greater London Authority	csio5074	Safe and Inclusive Neighbourhoods	Issue 9.1	Information provided regarding the encouragement of walk trips within the borough should be expanded to include further information on what exactly will be done to develop a good walk network such as new footways, upgrading or widening existing footways, providing new at-grade pedestrian crossings along desire lines and ensuring facilities for mobility and access impaired people.
Giles Dolphin	Greater London Authority	csio5032	Improving housing quality and choice	Issue 4.7	All three options need to meet the ODPM Circular 1/2006. The Council should also refer to the accommodation needs of travelling people.
Giles Dolphin	Greater London Authority	csio5033	Improving housing quality and choice	Issue 4.8	The Core Strategy should incorporate all four options to be consistent with the London Plan. The forthcoming Open Space Strategy should identify areas of deficiency and develop open space standards that will set out the requirements for new and improved open spaces that should be provided by new developments. This should also include provision for children's play and informal recreation as set out in the Mayor's SOG on this matter.
Giles Dolphin	Greater London Authority	csio5034	Investing in our economy	Issue 5.1	Option A is supported. Council is encouraged to consider the needs of business based on the evidence base including consideration of important business clusters.
Giles Dolphin	Greater London Authority	csio5035	Investing in our economy	Issue 5.1	Option B- Council is encouraged to consider childcare provision as a means of improving access to employment. Contributions towards childcare facilities could apply to commercial as well as residential developments, given its role in tackling barriers to employment, and reducing disparities in labour markets.
Giles Dolphin	Greater London Authority	csio5036	Investing in our economy	Issue 5.1	Option C is welcomed, the Council's consideration of training and employment initiatives as a means of improving employment opportunities for Londoners, set out in Policy 3B.11 of the London plan. The LDA would welcome a discussion with the Council regarding the ways working together can maximise the benefits of these initiatives, including the scope to support existing training and employment programs through financial contributions.

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Giles Dolphin	Greater London Authority	csio5029	Improving housing quality and choice	Issue 4.4	With regard to affordable housing for individual schemes the Council should refer to policies 3A.9 and 3A.10 of the London Plan.
Giles Dolphin	Greater London Authority	csio5077	Travelling efficiently between places	Chapter 10	Refer to a hard copy of the letter for a suggested model policy from TfL.
Giles Dolphin	Greater London Authority	csio5075	Travelling efficiently between places	Chapter 10	More specific references to the encouragement of walking and cycling should be included. TfL suggests that the text in Chapter 10 should be expanded to include separate policy on cycle parking, to refer specifically to the adoption of minimum cycle parking standards in line with the London Plan. Secure, accessible, weatherproof cycle parking should be provided at new developments, public transport interchanges and other key destinations.
Giles Dolphin	Greater London Authority	csio5031	Improving housing quality and choice	Issue 4.6	Student accommodation should be considered as an option as it appears to have been omitted in this consultation.
Giles Dolphin	Greater London Authority	csio5049	Centres you want to go to	Issue 7.1	Option C - Elevate some centres is supported as being able to strengthen neighbourhood centres. The NOF Masterplan seeks to recognise Leyton as being a centre that can be strengthened through alignment with Stratford City and the Olympic Games.
Giles Dolphin	Greater London Authority	csio5016	Our Spatial Vision	Chapter 2	Reference should be made to the Northern Olympic Fringe Master plan as a means to capture the opportunities afforded by the Olympic Games and development of Stratford City.
Giles Dolphin	Greater London Authority	csio5079	Travelling efficiently between places	Issue 10.1 and 10.2	Text in chapter ten should be expanded to include a separate policy on car parking, to refer specifically to the maximum car parking standards as provided in Annex 4 of the London Plan.
Giles Dolphin	Greater London Authority	csio5018	Our Spatial Vision	Chapter 2	Reference to the Legacy Master plan Framework and NOF Master plan should be identified as a means of creating wealth and opportunity for all residents.
Giles Dolphin	Greater London Authority	csio5023	Protecting and improving our places	Chapter 3	Focus on sustainable drainage is welcomed.
Giles Dolphin	Greater London Authority	csio5052	Centres you want to go to	Issue 7.3	Options A, B and D - mixed use developments supported.

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Giles Dolphin	Greater London Authority	csio5050	Centres you want to go to	Issue 7.1	Option D the role of niche markets serving ethnic communities should also be considered in context of supporting BAME businesses as set out in policy 3B.1 of the London Plan. Council should assess the likely impacts of redevelopment or regeneration that currently provide specific needs of ethnic communities.
Giles Dolphin	Greater London Authority	csio5057	Healthy Environment	Issue 8.2	Policy 3D.8 states that all developments will be expected to incorporate appropriate elements of open space that make a positive contribution to the wider network. The Core Strategy should include A4 maps that identify the deficiencies in the local and district parks as set out in Table 3D.1 of the London Plan.
Giles Dolphin	Greater London Authority	csio5048	Centres you want to go to	Issue 7.1	Options A and B rational behind these should be considered in light of the evidence base. Issues regarding the amount, quality, retained representation and suitability of retail space should be explored to inform the options and could result in a combinations of these strengthening the role of the centres.
Giles Dolphin	Greater London Authority	csio5047	Centres you want to go to	Chapter 7	Further details regarding comprehensive redevelopment of centres dealing with issues such as land assembly, protection of niche markets and proliferation of specific uses should also be considered in an area specific context.
Giles Dolphin	Greater London Authority	csio5046	Centres you want to go to	Chapter 7	A number of these in this chapter are repetitive and inter-linked. As a starting point, the assessment of retail needs should inform the options. Further information on the conclusions of the study are needed to understand the implications relating to those options. Key issues (including the proliferation of hot food take away) should be explored in this evidence base. Core strategy should better explain the hierarchy and function of the town centres, inc the role of neighbourhood centres and options for change, such as the role of Blackhorse Lane.
Giles Dolphin	Greater London Authority	csio5045	Making the most of our Education	Issue 6.2	Option C to build on open space will not be in general conformity with the London Plan. London plan does not endorse encroachment on open space. These spaces should be protected for environmental services, people and wildlife.

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Giles Dolphin	Greater London Authority	csio5044	Making the most of our Education	Issue 6.1	Option C to build on open space will not be in general conformity with the London Plan. London plan does not endorse encroachment on open space. These spaces should be protected for environmental services, people and wildlife.
Giles Dolphin	Greater London Authority	csio5043	Investing in our economy	Issue 5.3	Option E - The Council's commitment to supporting SMEs as a means of delivering the objectives of Policy 3B.1 of the London Plan is supported. The specific need, types of accommodation and location required of the SMEs should be informed by a robust evidence base.
Giles Dolphin	Greater London Authority	csio5042	Investing in our economy	Issue 5.3	Option C - Regeneration Areas should be informed by the evidence base and details and should be set out in AAPs in order to provide investors a good level of certainty about regeneration aims, and should include information on the types of uses, connections, phasing and height and massing parameters as well as an indication of whether CPO powers could be used in order to bring about comprehensive redevelopment of areas.
Giles Dolphin	Greater London Authority	csio5037	Investing in our economy	Issue 5.2	Option A - Consideration of accessibility of employment areas is welcomed. Where improvements are required, therefore an intensification of use, financial contributions towards such improvements should be considered. The council should also consider the connections and networks that are likely to be set out in the Upper Lee Opportunity Area Planning Framework.
Giles Dolphin	Greater London Authority	csio5051	Centres you want to go to	Issue 7.2	Comments for 7.1 also apply to this section. Option D - the least preferable, given the need to strengthen the town centre hierarchy and assist centres compete with others in the surrounding areas.
Giles Dolphin	Greater London Authority	csio5053	Centres you want to go to	Issue 7.3	Option C - GLA would support the council in setting out restrictions on certain uses to reduce the proliferation of uses.
Giles Dolphin	Greater London Authority	csio5055	Centres you want to go to	Issue 7.4	Option D - AAPs will assist to set out how best to comprehensively redevelop town centres.

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Giles Dolphin	Greater London Authority	csio5017	Our Spatial Vision	Chapter 2	Reference should be made in this section to the relationship between the NOF Master plan and the Legacy Master plan Framework.
Giles Dolphin	Greater London Authority	csio5022	Protecting and improving our places	Issue 3.5	GLA support the recognition of the Flood Risk and Surface water issues. The SFRA council should be completing should be used to inform land use allocation. In particular the River Lee Flood defences are thought by the Environment Agency to be less than 1 in 100 year protection.
Giles Dolphin	Greater London Authority	csio5021	Protecting and improving our places	Chapter 3	Core Strategy should seek to improve access to and the quality of landscape in the urban fringe as set out in Policy 3D.17 of the London Plan. The active participation of the Council in the Green Arc partnership would be welcomed.
Giles Dolphin	Greater London Authority	csio5019	Protecting and improving our places	Issue 3.3	Core strategy should incorporate all three options to be consistent with Policy 3D.14 of the London Plan. Should seek to improve existing nature conservation sites and seek to improve nature in areas of deficiency.
Giles Dolphin	Greater London Authority	csio5039	Investing in our economy	Issue 5.2	Option B- In terms of improvements to existing estates, the Council is encouraged to consider flood space and layout inefficiencies and accessibility issues, and assess whether it should follow that estates which are affected by this should imply that employment use is unsuitable and therefore justifies its loss. There could be potential to address a number of issues affecting existing employment sites to restore their viability through improved layout efficiency, access, restructuring estates, etc.
Giles Dolphin	Greater London Authority	csio5040	Investing in our economy	Issue 5.3	Option A - The protection of designated Industrial Areas is welcomed by the GLA, and would support carefully considered de-designation of employment land where this is in accordance with the London Plan (2008), and informed by the Employment Land Study. The Council should consider how surplus land could help meet the requirements for a mix of uses such as housing and social infrastructure and contribute to town renewal where appropriate.

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Giles Dolphin	Greater London Authority	csio5041	Investing in our economy	Issue 5.3	Option B - this option is supported as a means of meeting the aims of Policy 3B.1 of the London Plan. The Council should consider the scope for requiring affordable employment space, particularly where a scheme results in a significant loss in employment space. LDA would welcome discussions with council about opportunities for seeking affordable employment space.
Giles Dolphin	Greater London Authority	csio5056	Healthy Environment	Issue 8.2	Core Strategy should incorporate all options to be consistent with the London Plan. Should protect open spaces, seek to improve quality and access and redress identified deficiencies. Should identify areas protected by Green Belt, Metropolitan Open Land and local open space designations.
Giles Dolphin	Greater London Authority	csio5054	Centres you want to go to	Issue 7.3	Option E - GLA would support the council in efforts to improve the range and quality of shops based on the careful assessment of need and reasons behind this measure.
Giles Dolphin	Greater London Authority	csio5020	Protecting and improving our places	Chapter 3	Core Strategy should include requirement of green infrastructure in development proposals.
Giulia Bunting of Drivers Jonas (Agent)	National Grid Property Holdings	csio5014	Improving housing quality and choice	Issue 4.1	Core Strategy should recognise the opportunities that allowing high density development adjacent to existing open space can provide. Lea Bridge Road site has the potential to meet some of the housing land required to meet the councils target. This would make appropriate use of a brownfield site in accordance with national planning policy. Furthermore it would not impact upon employment as no employees currently work on this site.
Giulia Bunting of Drivers Jonas (Agent)	National Grid Property Holdings	csio5013	Improving housing quality and choice	Issue 4.1	The Lea Bridge site has potential to provide some of the housing land required in the short to medium term. The site is currently allocated as Strategic Employment Location, but has no employees on this site. Accordingly, if part or all of the land is transferred to housing, there would be no net loss of jobs in the SEL.
Giulia Bunting of Drivers Jonas (Agent)	National Grid Property Holdings	csio5015	Investing in our economy	Issue 5.3	A realistic mix of uses and flexible density requirements should be identified to ensure that business and employment structures can change with market forces.

Full Name	Organisation	Response ID	Theme	Consultation Point	Consultee's Comments/Summary
Howard J Green	Howard J Green	csio5089	Protecting and improving our places	Chapter 3	Finally, note that the Stadium site is within a Flood Risk area on the Environment Agency map. I have not been able to find out what Zone it is in. Surely the existing use is far more appropriate in a flood plain than residential development?
Howard J Green	Howard J Green	csio5085	Protecting and improving our places	Chapter 3	Goldsborough Crescent should be a candidate for Conservation Area Designation. It has maintained its original character over the last 75 years. Recently a planning inspector refused planning permission for the erection of a side extension at No.2 Goldsborough Crescent quoting the estate as 'one of uniformity and harmony'.
Howard J Green	Howard J Green	csio5086	Protecting and improving our places	Chapter 3	The Stadium is of Local, Regional, National, and some people consider, International importance. For decades it has provided entertainment and a venue for many sporting and leisure activities (in addition to greyhound racing) for the enjoyment of hundreds of thousands, if not millions, of people. However, at a stroke, it has apparently disappeared so far as the Planning Department is concerned without any considerations of the ramifications, not only about the loss of a major leisure facility, but on the local and regional economy. ("Major" is your description of the Stadium (see para 1.4(a)) below).

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Howard J Green	Howard J Green	csio5087	Protecting and improving our places	Chapter 3	At para 4.19 of the Adopted UDP (March 2006) within Chapter 4: Town Centres Retailing and Leisure it is stated, amongst other things:- "The Borough has a modest selection of commercial facilities particularly in relation to its potential catchment population. Existing major facilities include Larkswood Leisure Park, the Greyhound Stadium and Gala Bingo on Lea Bridge Road.. The choice of major facilities is limited and many local residents travel away from the Borough to reach some forms of leisure and entertainment facilities..".However at para 7.5 of the Issues and Options Consultation it is stated at bullet 7:- "Existing major facilities include Larkswood Leisure Park and the Gala Bingo on Lea Bridge Road". So far as the Planning Department is concerned, therefore, the Greyhound Stadium has disappeared.
Howard J Green	Howard J Green	csio5088	Protecting and improving our places	Chapter 3	The fact that the present owners of the Stadium have closed down their business does not mean that the Stadium must be lost. Indeed, I understand from press reports that there are other consortia interested in the facility. The fact is that the buildings and most of the associated major infrastructure remain; The LDF process is an opportunity to consider the loss of the Stadium and that is an Issue of the utmost importance; Whilst you have extended the period for representations until 1st September your consultation has been carried out in the prime holiday period and there are other thoughts that occur to me with regard to this issue ie what are the provisions of the London Plan and what does the Mayor of London think about this loss? Are there any considerations with regard to Government advice in PPG17: Sport and Recreation and PPS21: Tourism?;
Hugh Sowerby of Drivers Jonas (Agent)	St Modwen Properties plc	csio5008	Improving housing quality and choice	Chapter 4	St Modwen seeks to discuss a suitable percentage of wheelchair and lifetime homes for the Arcade site with the council.

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Hugh Sowerby of Drivers Jonas (Agent)	St Modwen Properties plc	csio5007	Improving housing quality and choice	Chapter 4	St Modwen supports the principle of providing affordable housing in town centre locations. The level of affordable housing provision however, should not be set at a level that would preclude development from being brought forward. A flexible approach to affordable housing should be taken by Council.
Hugh Sowerby of Drivers Jonas (Agent)	St Modwen Properties plc	csio5006	Protecting and improving our places	Chapter 3	St Modwens advocates early consultation at the beginning of the design process to ensure that the formulation of proposals are consistent with best practice.
Hugh Sowerby of Drivers Jonas (Agent)	St Modwen Properties plc	csio5005	Protecting and improving our places	Chapter 3	St Modwens seeks to ensure that development is accessible to all and applies best practice standards to all developments.
Hugh Sowerby of Drivers Jonas (Agent)	St Modwen Properties plc	csio5003	Protecting and improving our places	Chapter 3	Supportive of the proposed Urban Design Strategy and is keen to work with the Council in preparation of this document.
Hugh Sowerby of Drivers Jonas (Agent)	St Modwen Properties plc	csio5002	Protecting and improving our places	Chapter 3	Supports the role urban design has in influencing the processes which lead to successful urban areas. Supports environmental sustainability and high standards of design.
Hugh Sowerby of Drivers Jonas (Agent)	St Modwen Properties plc	csio5001	Protecting and improving our places	Chapter 3	Notes the Council's aspiration to transform the physical, economic and social life and supports the highlighted objectives.
Hugh Sowerby of Drivers Jonas (Agent)	St Modwen Properties plc	csio5004	Protecting and improving our places	Chapter 3	Notes the need to ensure that development is inclusive and the town centre is accessible to all.
Imogen Radford	Hoxton Manor Allotment site	csio5229	Healthy Environment	Chapter 8	It seems extraordinary that this is strategy document makes no mention whatsoever of allotments. Allotments are important in many of the key areas in this report, and their promotion and development could have a very positive impact in the borough.

Full Name	Organisation	Response ID	Theme	Consultation Point	Consultee's Comments/Summary
Imogen Radford	Hoxton Manor Allotment site	csio5230	Healthy Environment	Chapter 8	Would like to see Waltham Forest making allotments a key part of improving the borough. We want to see all of the allotments sites that exist maintained, and more created including using section 106 notices and other powers where appropriate. We would like to see more allotment sites or other communal fruit and vegetable growing sites in the borough so that people don't have to travel so far to get an allotment and don't have to wait so long to get the chance to garden. We would like the borough to realise the importance of allotments for health, society and the environment, for the education of our children and adults about the environment, wildlife, healthy eating and social development, and we would like them to recognise this in the plan by celebrating and encouraging allotment gardening provision.
James Stevens	Homes Builders Federation Ltd	csio5133	Doing our bit for the environment	Option 11.2	Support council in helping home builders achieve code level 6 (zero carbon).
James Stevens	Homes Builders Federation Ltd	csio5129	Healthy Environment	Issue 8.4	Council should identify sites where existing services are good and can support further development in all areas of the borough not just regeneration sites.
James Stevens	Homes Builders Federation Ltd	csio5131	Travelling efficiently between places	Issue 10.2	Mixed use development will aid in the managing travel needs.
James Stevens	Homes Builders Federation Ltd	csio5106	Introduction	Chapter 1	Further development required to give better picture of the borough such as what is the population of the north of the borough; what's the capacity of the schools and services; what is the state of the infrastructure and what are the demographics.
James Stevens	Homes Builders Federation Ltd	csio5130	Safe and Inclusive Neighbourhoods	Option 9.2	A need to increase housing supply not ration a capped amount amongst certain groups of people.
James Stevens	Homes Builders Federation Ltd	csio5128	Making the most of our Education	Issue 6.1 and 6.2	Additional provision of schools should be subject to evidence of existing capacity and likely new demand.
James Stevens	Homes Builders Federation Ltd	csio5127	Investing in our economy	Issue 5.3	Waltham Forest is a borough that can accommodate some transfer of redundant industrial sites to other uses such as residential, according to the Mayor's SPG, while having regard for further industrial and employment uses. These opportunities should be explored.

Full Name	Organisation	Response ID	Theme	Consultation Point	Consultee's Comments/Summary
James Stevens	Homes Builders Federation Ltd	csio5126	Improving housing quality and choice	Issue 4.8	Support for option C and recommend that the council works with home builders to assist them meet targets set out in the national timetable for energy efficiency by the Code of Sustainable Homes.
James Stevens	Homes Builders Federation Ltd	csio5125	Improving housing quality and choice	Issue 4.6	Lifetime Homes and the 10% wheelchair housing and targets, they are not mandatory and can only be encouraged where feasible.
James Stevens	Homes Builders Federation Ltd	csio5124	Improving housing quality and choice	Issue 4.5	The council should be flexible on where affordable housing is provided on site, whether it be pepper potting or in a single area, or off site.
James Stevens	Homes Builders Federation Ltd	csio5123	Improving housing quality and choice	Option 4.3	Affordable Housing percentage targets should be applied with a high level of flexibility to take into account the varying viability amongst a range of sites.
James Stevens	Homes Builders Federation Ltd	csio5122	Improving housing quality and choice	Issue 4.3	Increasing Waltham Forest's housing target until 2028 is a better way of securing affordable housing rather than increasing proportions of mandatory affordable housing within a capped housing target. This reduce ability for owner-occupation and force more houses onto the housing register.
James Stevens	Homes Builders Federation Ltd	csio5121	Improving housing quality and choice	Option 4.2	Paragraph 22 in PPS3 says that councils are only allowed to determined the size and type of affordable housing. Developers will be aware of the market and therefore there should be flexibility on this point.
James Stevens	Homes Builders Federation Ltd	csio5120	Improving housing quality and choice	Issue 4.2	Councils approach should be determined by the findings of the SHMA and the GLA SHMA
James Stevens	Homes Builders Federation Ltd	csio5110	Protecting and improving our places	Issue 3.1	An urban design overview would be appropriate at the level of mastepans or pattern book type approach.
James Stevens	Homes Builders Federation Ltd	csio5132	Doing our bit for the environment	Option 11.2	Core Strategy should reflect London Plan target of 20% on-site renewable energy. Concerned with the costs to developers and to residents associated with the installation of district wide heating systems.
James Stevens	Homes Builders Federation Ltd	csio5119	Improving housing quality and choice	Option 4.1	A mix of all three options would be advisable and will in part be determined by the SHLAA, the existence of infrastructure and the likelihood of infrastructure materialising in the next 6-20 years.
James Stevens	Homes Builders Federation Ltd	csio5108	Protecting and improving our places	Issue 3.4	Public contributions to public art should be optional rather than a requirement.

Full Name	Organisation	Response ID	Theme	Consultation Point	Consultee's Comments/Summary
James Stevens	Homes Builders Federation Ltd	csio5107	Our Spatial Vision	Chapter 2	Is the vision to become London's greenest borough overly ambitious? Should lateral communications across the borough be a bigger priority?
James Stevens	Homes Builders Federation Ltd	csio5111	Protecting and improving our places	Issue 3.2	The council should focus on the protection of existing areas and not seek to designate any more conservation areas, which present significant barriers to development.
James Stevens	Homes Builders Federation Ltd	csio5112	Protecting and improving our places	Issue 3.3	Economic growth should not be viewed as a hindrance to environmental conservation.
James Stevens	Homes Builders Federation Ltd	csio5113	Protecting and improving our places	Issue 3.5	If the council refuses development in all areas of flood risk it may have to release green belt land to meet 2017 housing target.
James Stevens	Homes Builders Federation Ltd	csio5114	Improving housing quality and choice	Paragraph 4.1	Given that the anticipated population growth by 2026 will be a maximum of 19000 and the national household size is 2.33, there will be a need for 8154 new dwellings. The council should consider this figure when planning the type of dwellings needed to meet the need of housing demand.
James Stevens	Homes Builders Federation Ltd	csio5115	Improving housing quality and choice	Paragraph 4.6	Provision of 3 and 4 bedroom will need to be determined by the findings of the GLA SHMA as well as consideration of the existing unmet housing requirements.
James Stevens	Homes Builders Federation Ltd	csio5116	Improving housing quality and choice	Paragraph 4.7	Would like an opportunity to see Waltham Forest's SHLAA.
James Stevens	Homes Builders Federation Ltd	csio5117	Improving housing quality and choice	Paragraph 4.7	Council's approach to housing supply does not strictly comply with the requirements of PPS3. Concerned that there are short to medium uncertainties involved due to the reliance on regeneration sites for their contribution. Suggest that council plan around other sites to meet the targets within the first five years of the plan to ensure provision.

Full Name	Organisation	Response ID	Theme	Consultation Point	Consultee's Comments/Summary
James Stevens	Homes Builders Federation Ltd	csio5118	Improving housing quality and choice	Paragraph 4.9	The credit crunch is set to have a negative impact on affordability by making it difficult to secure a mortgage even when house prices themselves are becoming more affordable. This problem should be acknowledged in the Core strategy as a factor contributing to lack of affordability. There is a need to reduce regulatory burden on developers to ensure a dependable supply of completed housing projects, albeit a lower supply than would be expected in a more buoyant climate.
James Stevens	Homes Builders Federation Ltd	csio5109	Improving housing quality and choice	Chapter 4	Studies on housing mentioned will be valuable in helping to provide evidence of suitable locations for housing, or how new housing can be appropriately integrated into the existing landscape.
Matt Davis	London Borough of Waltham Forest - Conservative Group	csio5262	Improving housing quality and choice	Issue 4.3	Object to the 50% affordable housing quota. This is politically motivated and will be used to try and gain electoral advantage. The evidence would suggest that 50% is ineffective and does not achieve its stated objectives.
Matt Davis	London Borough of Waltham Forest - Conservative Group	csio5263	Improving housing quality and choice	Issue 4.3	The approach of setting an arbitrary 50% housing target has comprehensively failed London; the proportion of affordable housing has dropped from 40% - 45% between 1997 - 2001 to just 34% of the completions last year. Experience shows that when a borough council moves away from the percentage target, they can end up building more affordable units. According to the Annual Monitoring Report for the London Plan, from 2005/6 to 2006/7: Hounslow decreased the proportion of build given to affordable housing from 63% to 44%, but increased the number of affordable homes built from 303 to 635 units. Islington decreased the proportion of build given to affordable housing from 67% to 30%, but increased the number of affordable homes built from 491 to 534 units. Bexley decreased the proportion of build given to affordable housing from 68% to 48%, but increased the number of affordable homes from 58 to 115 units. Furthermore, when some boroughs moved towards the 50% target they ended up building fewer affordable homes

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Matt Davis	London Borough of Waltham Forest - Conservative Group	csio5264	Improving housing quality and choice	Issue 4.3	For example, between 2005/6 to 2006/7: Richmond upon Thames increased the proportion of build given to affordable housing from 10% to 14%, but ended up building fewer homes from 91 to 32 units. Kensington and Chelsea increased the proportion of build given to affordable homes from 31% to 39%, but ended up building fewer homes from 65 to 64 units. Hillingdon met the same proportion of affordable homes in each year, 24%, but ended up building fewer homes from 118 to 46 units last year. This approach is also leading to land being underdeveloped. Since February 2008, the 50% target has applied to developments of ten units rather than developments of 15 units – the GLA estimates that 11,000 sites are of this size. The result is that developers are building below unit thresholds. Indeed, when Tower Hamlets trialled the threshold reduction to nine units there was a dramatic decrease in the number of planning applications for 14-unit developments – from ten in 2005 to just one last year.
Matt Davis	London Borough of Waltham Forest - Conservative Group	csio5265	Improving housing quality and choice	Issue 4.3	Whilst not against high density per se we do believe that it is inappropriate for the vast bulk of Waltham Forest. With the exception of central Walthamstow and those areas closest to Stratford City it would be highly inappropriate. It needs to be noted that the forthcoming London plan will be considerably more restrictive of high density and especially high rise than is currently the case. The SCS contains a commitment to retaining wealth within the borough. For the LDF to support that aspiration it must protect the housing stock and areas to which our wealthier residents would aspire. In particular we believe that statutory plan protection must be applied to North Chingford, Walthamstow Village, Upper Walthamstow, Bushwood, and the Goldsmiths Road area. These areas should be extended protection from conversions, house demolitions, and inappropriate development and change of use.

Full Name	Organisation	Response ID	Theme	Consultation Point	Consultee's Comments/Summary
Patrick Blake	Highways Agency	csio5249	Travelling efficiently between places	Issue 10.3	The HA would not support costly road improvement proposals unless a sufficient review or more sustainable options had first been completed. Where enhancements to the road network are proposed, the potential impact on the local network and SRN must be assessed. The Core Strategy should also identify clear sources of funding for public transport improvements to ensure that proposals are deliverable (Option C).
Patrick Blake	Highways Agency	csio5248	Travelling efficiently between places	Issue 10.2	Travel Plans (Option E) are effective means through which to encourage travel by more sustainable modes. The strategy should set out the thresholds for new developers to produce detailed travel plans. Travel Plans should include targets, measures and monitoring arrangements and should be produced by all developments that exceed the thresholds defined in TfL guidance on Workplace Travel Planning and Residential Travel Planning in line with London Plan Policy 3C.2. The HA would not be supportive of Option A as it would not address the need to manage demand to ensure there is a nil-detriment effect on the SRN from development in the Borough.
Patrick Blake	Highways Agency	csio5247	Travelling efficiently between places	Issue 10.1	Supportive of Option C as a means of improving accessibility. HA Recommends that maximum parking standards should be reduced in areas with high accessibility. HA would be supportive of a level of car-free permit-free development at appropriate locations with the best access to public transport.
Patrick Blake	Highways Agency	csio5246	Safe and Inclusive Neighbourhoods	Issue 9.1	HA welcomes proposals to improve walking facilities within the borough.
Patrick Blake	Highways Agency	csio5242	Making the most of our Education	Issue 6.1 and 6.2	Should option C for both issues be put forward by the council, then it would be important that the location of new schools contributes to a balanced provision of services across the borough. This will in turn reduce the need for residents to travel to access schools and hence contribute to decreased private car use.

Full Name	Organisation	Response ID	Theme	Consultation Point	Consultee's Comments/Summary
Patrick Blake	Highways Agency	csio5245	Healthy Environment	Issue 8.1 8.2 and 8.3	Should Options A, C and B in Issues 8.1, 8.2 and 8.3 respectively be pursued by the Borough, the accessibility of new or relocated sites using sustainable transport options must be considered.
Patrick Blake	Highways Agency	csio5236	Improving housing quality and choice	Issue 4.2	Should not develop more family housing away from centres without first assessing the accessibility of both employment and services. Should developments that are likely to have a large traffic impact come forward, a Transport Assessment should be prepared including a travel plan where appropriate. To ensure the CS is consistent with national policy, this should be a requirement of the policy.
Patrick Blake	Highways Agency	csio5244	Centres you want to go to	Issue 7.3	Refer to discussion on mixed use development under issue 4.1.
Patrick Blake	Highways Agency	csio5243	Centres you want to go to	Issue 7.1 and 7.2	Travel intensive uses such as supermarkets and larger shopping centres, offices and businesses should be located in or close to town centres and near public transport hubs. These locations are better served by public transport links and will ensure that new developments benefit from an enhanced level of accessibility. Where the strengthening of a town centres role is proposed this should be supported by a sustainable transport plan.
Patrick Blake	Highways Agency	csio5231	Our Spatial Vision	Chapter 2	As part of a package of measures reducing the need to travel, it is recommended that the CS should seek to deliver a balanced provision of housing, employment and services.
Patrick Blake	Highways Agency	csio5240	Investing in our economy	Issue 5.3	Option D would be actively encouraged by the HA where it leads to a reduction in the transportation of waste and the internalisation of the waste chain within the borough.
Patrick Blake	Highways Agency	csio5239	Investing in our economy	Issue 5.3	Broadly supportive of town centre office and mixed use developments, where it helps to achieve a strategic balance of the provision of employment, housing and services in the borough.
Patrick Blake	Highways Agency	csio5237	Investing in our economy	Issue 5.1	HA is supportive of CS policies which in addition to achieving a balanced provision of housing, employment and services also seek to strengthen the local economy.

Full Name	Organisation	Response ID	Theme	Consultation Point	Consultee's Comments/Summary
Patrick Blake	Highways Agency	csio5235	Improving housing quality and choice	Issue 4.1	HA not supportive of option B as sees using open spaces for development as unsustainable. This would most likely reduce the need for travel.
Patrick Blake	Highways Agency	csio5234	Improving housing quality and choice	Issue 4.1	Option A would be welcomed by the HA where the infrastructure demands associated with development are assessed correctly.
Patrick Blake	Highways Agency	csio5233	Improving housing quality and choice	Issue 4.1	Strategic balance between housing, employment and services across the borough as means of reducing the need to travel by reducing imbalances of provision of services. Further to this the HA is broadly supportive of increasing the density of existing areas.
Patrick Blake	Highways Agency	csio5232	Travelling efficiently between places	Chapter 10	Although the recognition in paragraph 2.19 that local transport needs to be improved is welcomed by the HA, it is important that an emphasis is placed on the provision and improvement of sustainable transport infrastructure. This will help contribute to a reduction in private vehicle trips. The CS should be amended to reflect an emphasis on sustainable transport options. This would bring it into line with national policy
Patrick Blake	Highways Agency	csio5238	Investing in our economy	Issue 5.2	Option A is supported as it promotes better access to employment land, would be supported by the HA. It would be a concern if improved road access was encouraged without properly assessing the potential transport impacts on the SRN.
Patrick Blake	Highways Agency	csio5241	Investing in our economy	Issue 5.3	Notes that Option C identifies areas for employment land including Blackhorse Lane. The current poor accessibility of this area could lead to a growth in private car use and hence increased impact on the transport system.
Peacock and Smith (Agent)	Wm Morrison Supermarkets Plc	csio5104	Doing our bit for the environment	Chapter 11	Policy within Core Strategy on Energy Efficiency should confirm that onsite energy generation requirements had the following test (as per PPs22 paragraph22) (i) generation is only required where installation of generation equipment is viable given the type of development proposed, its location and design. (ii) should not be framed in a way that places undue burden on developers.

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Sally Gorham	Waltham Forest Primary Care Trust	csio5260	Healthy Environment	Chapter 8	In all of this it has to be remembered that the emerging LDF must take account of the Mayor of London's forthcoming revised London Plan and cannot be allowed to simply follow the current outmoded one.
Sally Gorham	Waltham Forest Primary Care Trust	csio5259	Healthy Environment	Chapter 8	Health infrastructure should be assessed having regard to the current supply and condition of facilities.
Sally Gorham	Waltham Forest Primary Care Trust	csio5258	Healthy Environment	Chapter 8	It would appear that no assessment has been undertaken looking at the spatial distribution of health issues and conditions, the causes and relationships between physical development and health and the possible policy interventions which could address health issues. Council is encouraged to use HUDU's Watch out for Health to identify the possible policy interventions that could have a positive effect on health. Policies should be targeting local areas where health is a problem i.e. 'hotspots'.
Sally Gorham	Waltham Forest Primary Care Trust	csio5257	Our Spatial Vision	Chapter 2	A vision for the strategy should support the sustainable community strategy by giving spatial interpretation to its aims and aspirations. The Core strategy does not include a spatial vision and includes only three key strategic objectives. It is unclear how the sustainable community strategy aims and aspirations are translated into the strategic objectives for the core strategy.
Sally Gorham	Waltham Forest Primary Care Trust	csio5255	Introduction	Chapter 1	Council is encouraged to use a matrix or table setting out the policy context- the national, the London Plan and the community strategy, in order to be able to trace the conformity of the Core Strategy policies. Refer to the letter for an example of the matrix.
Sally Gorham	Waltham Forest Primary Care Trust	csio5254	Healthy Environment	Chapter 8	The Core Strategy should give spatial expression to and deliver the health aims and objectives of the sustainable community strategy.
Sally Gorham	Waltham Forest Primary Care Trust	csio5253	Healthy Environment	Chapter 8	Please see the letter for a list of Health Plans and Strategies the Core strategy should address.
Sally Gorham	Waltham Forest Primary Care Trust	csio5252	Healthy Environment	Chapter 8	Please see letter for a list of London Plan health policies which the Core Strategy should address.

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Sally Gorham	Waltham Forest Primary Care Trust	csio5251	Healthy Environment	Chapter 8	There is support for collaboration between respondent and the council to ensure alignment of strategies.
Sally Gorham	Waltham Forest Primary Care Trust	csio5250	Healthy Environment	Chapter 8	The core strategy should be supported by what physical, social and green infrastructure is needed within the region. The core strategy should draw on and in parallel influence any health strategies and investment plans and identify: infrastructure needs and costs; phasing of development; funding sources; and responsibilities for delivery.
Sally Gorham	Waltham Forest Primary Care Trust	csio5261	Healthy Environment	Chapter 8	Spatial planning has a key role is promoting healthier communities and improving access to health facilities. The core strategy does not give attention to health and health service issues and the cross-cutting theme is welcomed. Policy options are presently under-developed with limited evidence of the spatial implications of the issues and the possible locally specific interventions.
Sally Gorham	Waltham Forest Primary Care Trust	csio5256	Introduction	Chapter 1	It would be helpful if the sustainability appraisal identified detailed criteria, targets and indicators.
Stephen Wilkinson	Lee Valley Park	csio5224	Investing in our economy	Option 5.2	Authority supports the options for creating high quality working environment. Core Strategy should also consider how to improve links to the environmental assets such as the Regional Park.
Stephen Wilkinson	Lee Valley Park	csio5219	Protecting and Improving our places	Issue 3.1	Regional Park should be identified as one of the important elements which help to make the borough distinctive. The range of open spaces, industrial and social heritage, walking and cycling routes etc are a major asset both within the borough and to greater London. Reference is required to the NLSA's vision for the Upper Lea Valley as 'North London's Waterside'. All options within Option 3.1 have a role to play in promoting high quality design.

Full Name	Organisation	Response ID	Theme	Consultation Point	Consultee's Comments/Summary
Stephen Wilkinson	Lee Valley Park	csio5220	Protecting and improving our places	Issue 3.2	Supports the range of options to protect existing sites of ecological importance, both those identified as regionally significant and this with local value. Option to create a protect a network of sites and corridors together with improved management will be essential to enhancing biodiversity. Of equal importance is increasing people's access to nature, both established sites and to more informal sites.
Stephen Wilkinson	Lee Valley Park	csio5221	Protecting and improving our places	Issue 3.4	Support Option B. The Authority is jointly commissioning a Planning Framework with the borough to identify how improved access can be achieved around the Lea Bridge Road area.
Stephen Wilkinson	Lee Valley Park	csio5223	Improving housing quality and choice	Option 4.1	Support Option C which requires that new housing be concentrated on Brownfield sites.
Stephen Wilkinson	Lee Valley Park	csio5225	Healthy Environment	Issue 8.2	Core Strategy should embrace the full range of options presented. Explicit reference to the Authority's facilities including the LEE valley Ice Centre and the Waterworks visitor centre, golf course and nature reserve. Policy within the Core Strategy will need to refer to proposals in the Park Development Framework particularly the Park Act Section 14.
Stephen Wilkinson	Lee Valley Park	csio5226	Travelling efficiently between places	Issue 10.1	The Core Strategy should recognise the Lee Valley Pathway project and the draft proposals for the Green Grid. Support for Improvement of rail links particularly down to Stratford.
Stephen Wilkinson	Lee Valley Park	csio5227	Travelling efficiently between places	Issue 10.3	Careful consideration should be given to improvements of the road network which it passes through the regional park. Traffic calming, appropriate plating and maintenance of the green road frontages, maintenance of the view into the Park and development of safe crossing points should form part of the road network enhancements.
Stephen Wilkinson	Lee Valley Park	csio5228	Protecting and improving our places	Chapter 3	The authority supports the council's aim to set effective targets to ensure development minimises the impact on the environment. Also in support of SUDS.

Full Name	Organisation	Response ID	Theme	Consultation Point	Consultee's Comments/Summary
Stephen Wilkinson	Lee Valley Park	csio5222	Protecting and improving our places	Issue 3.5	Council need to develop policy to reduce the risk of flooding, and development of areas which are prone to flooding. The authority supports the inclusion of a policy requiring sustainable drainage systems as part of all new development Option D. Furthermore Option C is highly supported.
Tom Moloney	LSP Housing Partnership	csio5278	Improving housing quality and choice	Option 4.8	All options are important and represent a package of measures to meet the aim of housing quality. An increase in the quality of the environment within houses will see retention of inhabitants which will lead to more sustainable communities. Internal design and space standards are just as important as external aesthetics. Design should look at care issues. Plance and space as important for children as it is for other people. Management of housing spaces is important. Although climate change is important the financial costs of measures cannot be ignored. People do not like grey water.
Tom Moloney	LSP Housing Partnership	csio5275	Improving housing quality and choice	Option 4.2	Support A and C. B - Happy with children living above ground floor level, as there is no guarantee that children wont be living in 1 and 2 bedroom apartments typically found above ground floor. Management, design and space standards need to be considered in all developments. D Families can live in the town centre, as long as the town centre is designed appropriately. It is important to ahve community in community locations.
Tom Moloney	LSP Housing Partnership	csio5273	Improving housing quality and choice	Option 4.3	B is the favoured option. However A (35% - 50%) is an acceptable target is 50% cannot be achieved.
Tom Moloney	LSP Housing Partnership	csio5272	Improving housing quality and choice	Option 4.4	Reject all options and accept a 60- 40 split, which will emerge in the revised London Plan. This is a better mix.
Tom Moloney	LSP Housing Partnership	csio5271	Improving housing quality and choice	Option 4.5	C supported - the need to scatter affordable dwellings amongst private development. Recognise that there will be a need for flexibility on this.
Tom Moloney	LSP Housing Partnership	csio5276	Improving housing quality and choice	Option 4.6	Support A and B. The aging population is important. There is a need to ensure that wherever possible disabled people are in wheelchair housing (management issue).

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Tom Moloney	LSP Housing Partnership	csio5277	Improving housing quality and choice	Option 4.7	Support B, a new travellers site. However A is accepted (extension to the existing site) if B can't happen.