

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(continue on a separate sheet if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

WHERE PREVIOUSLY THE LAMMAS LANDS DEFENCE COMMITTEE HAVE SUGGESTED AMENDMENTS OR OBJECTED TO PROPOSED AMENDMENTS IN EMERGING UNITARY DEVELOPMENT PLANS, THESE COMMENTS HAVE NOT BEEN TAKEN ON BOARD. BY MAKING A REPRESENTATION AT THE ORAL STAGE OF THE EXAMINATION IN PUBLIC WE CAN ENSURE OUR VIEWS ON OPEN SPACES, ACCESS AND HEIGHTS OF BUILDINGS ADJACENT TO M.O.L. AND/OR WATERWAYS ARE HEARD.

(continue on a separate sheet if necessary)

Please note the inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

28/02/2011

If you wish to be informed of the date of the submission of the document to the Secretary of State, please tick this box.

Respondent ID: 151476

3 Representations submitted (csps2 to csps4)

Comment on	Core Strategy Proposed Submission
Respondent ID	151476
Respondent	Mr Simon Munk
Representation ID	csps2
Response Date	01/02/2011
Submission Type	Web
Consultation Point	Chapter 04 - Policy CS1- Location and Management of Growth
Legal Compliance	Yes
Soundness	No
Unsound because it is not	(2) Effective
Reasons for compliance and soundness	<p>There is little in this document regarding appropriate infrastructure. For instance, 4.19 says that up to 2,000 new homes could be built in Walthamstow Town Centre. The Town Centre area is already suffering a shortage of primary and secondary school places, for instance. Yet no mention is made of any appropriate infrastructure developments within the area to support such expansion. This is true of other population growth areas also. The document should and must, to be effective, make mention of plans to support housing growth with appropriate infrastructure growth also. And, again, to be effective, it must make mention of how such infrastructure is to be planned, funded etc.</p>
Changes necessary for legal compliance and soundness	<p>Change the DPD to include specific policies on necessary infrastructure elements per X number of housing units or per need. And include, as above, clear potential sources of land and sources of funding etc.</p>
Oral Examination	NO
Reasons for oral examination	N/A
Attachment	Nil

Comment on Core Strategy Proposed Submission

Respondent ID 151476

Respondent Mr Simon Munk

Representation ID csps3

Response Date 01/02/2011

Submission Type Web

Consultation Point Chapter 05 - Paragraph 5.1

Legal Compliance Yes

Soundness No

Unsound because it is not (2) Effective

Reasons for compliance and soundness

There is little mention here of the potential to improve quality in rented housing. The DPD admits that much rented housing in the borough is overcrowded. And a casual survey of any residential street in the borough would show that rented housing locally tends to be kept in much worse state of repair than owner-occupied housing. Room subdivision, un-applied for conversions and extensions are common, yet borough enforcement is virtually non-existent. The DPD also mentions that many properties are empty. But it does not put forward any solid or concrete proposals to bring these properties back into use. In short, the DPD will not effectively deal with the rented property market or private landlords in terms of ensuring housing stock is of good quality and that is in use.

Changes necessary for legal compliance and soundness

Change the DPD to deliver concrete proposals to address the points above. The DPD should state that the council is prepared to use measures against "slum" landlords who leave properties in poor state of repair, expose tenants to health risks (damp, mould, poor drainage etc.), or who overcrowd illegally. Similarly the DPD should state that the council is prepared to use legal measures against property developers or those who leave properties empty for "no reason". And it should perhaps lay out what those measures might be.

Oral Examination NO

Reasons for oral examination N/A

Attachment Nil

Comment on Core Strategy Proposed Submission

Respondent ID	151476
Respondent	Mr Simon Munk
Representation ID	csps4
Response Date	01/02/2011
Submission Type	Web
Consultation Point	Chapter 07 - Paragraph 7.24
Legal Compliance	Yes
Soundness	No
Unsound because it is not	(2) Effective
Reasons for compliance and soundness	There is nothing here that indicates the council has appropriately or effectively planned for necessary infrastructure that sits alongside housing. In other words, new health centres, schools etc. should be planned to be near to where housing is planned, rather than far from it. This current paragraph is ineffective at putting forward any planned or coordinated response to predicted need.
Changes necessary for legal compliance and soundness	The DPD should be amended to include some idea of how infrastructure is planned to be physically located near to, within etc. new housing development or areas planned for intensified housing.
Oral Examination	Not specified
Reasons for oral examination	N/A
Attachment	Nil

Respondent ID: 152204
 1 Representation submitted (ID: csps108)



Development Plan Document (DPD)

Publication Stage Representation Form

Waltham Forest LDF Core Strategy DPD	<u>For office use only</u>
Representations can be made using this form or online:	Reference No: 152204
	Date received: 28/02/2011

<http://walthamforest-consult.limehouse.co.uk/portal>

If using this representation form, please return to the London Borough of Waltham Forest by 5pm on Monday, 28 February 2011

By post: Spatial Planning, Fir Tree House, London Borough of Waltham Forest, Town Hall Complex, Walthamstow, London E17 4JF

By email: planning.policy@walthamforest.gov.uk

This form has two parts:

Part A – Personal details (only needed once irrespective of how many representations you make)

Part B – Your representation(s). Please complete a separate sheet for **every** representation you wish to make, remembering to insert your name or organisation's name.

Please read the guidance notes before completing this form.

PART A

	1. Personal details*	2. Agent details (if applicable)
Title		
First name		
Last name		
Job title (where relevant)		
Organisation (where relevant)		London Development Agency
Address		
Post Code		
Telephone number		
Email address		

*If an agent is appointed, please enter the person and/or organisation being represented in column 1 and complete all contact details in column 2

Part B

Representation ID: csps108

Please use a separate sheet for each representation

Name or organisation: _____

3. To which part of the DPD does this representation relate?

Paragraph

Fig. 12, pg. 61

Policy

CS1

4. Do you consider the Core Strategy DPD is:

(1) Legally Compliant

Yes

No

(2) Sound

Yes

No

If you have entered 'no' to 4(2), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is unsound because it is not:

(1) Justified

(2) Effective

(3) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

N/A

(continue on a separate sheet if necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Site at Orient Way / Lea Bridge Road (see attached map)

The LDA recognises the site at Orient Way / Lea Bridge Road is currently allocated as a Strategic Employment Area (SEA) within the UDP (2006) and as Strategic Industrial Land (SIL) as part of the draft replacement London Plan (2009). The LDA also recognises the potential constraints the site experiences primarily in terms of poor public transport accessibility.

The current PTAL rating at the site is 2/ 1b. We note that the Council has campaigned to reinstate the Hall Farm Curve rail service, which includes the reopening of Lea Bridge Station, located on the north side of the Lea Bridge Road. The aspiration to deliver this is included in the Core Strategy Pre-Submission document under *Policy CS1 – Location and Management of Growth* and under the NOF AAP Preferred Options document under *Policy NOF12 - Connectivity*. It could therefore be assumed that if the reinstatement of the rail service and the reopening of the Lea Bridge Station were to go ahead, the PTAL rating of the area would considerably improve.

The LDA also notes that the site adjacent, the Lea Bridge Gas Works section of the Lea Bridge Gateway, has been de-designated as SIL to encourage "an opportunity to create a landmark mixed use development" and that the site is "well-connected to the existing residential grid". With the above in mind, the LDA considers that, should significant improvements to public transport accessibility occur and the mixed use aspirations of Gas Works site are realised, the Council should consider potential alternative land uses, including mixed use development for the Orient Way/ Lea Bridge Road site in accordance with national planning policy. Furthermore, the LDA suggests the Council give consideration to presenting alternative mixed use development allocations, again on the basis that the above transport and development scenarios are realised within the emerging NOF AAP. The LDA recognises that this option is long term in nature and the site should be continued to be allocated as an employment site in the short to medium terms.

PLEASE ALSO REFER TO THE LETTER SENT TO LBWF BY EMAIL & POST ON 28 FEBRUARY 2011.

(continue on a separate sheet if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

N/A

(continue on a separate sheet if necessary)

Please note the inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature

Date: 01 MARCH 2011

FOR + ON BEHALF OF THE
LONDON DEVELOPMENT AGENCY

If you wish to be informed of the date of the submission of the document to the Secretary of State, please tick this box.

LB Waltham Forest LDF Team
Spatial Planning
Fir Tree House
Waltham Forest Town Hall
London
E17 4JF

28 February 2011

Dear Sir/ Madam,

Consultation Response to the Local Development Framework

***A New Plan for Waltham Forest: Core Strategy Proposed Submission
Northern Olympic Fringe Area Action Plan: Preferred Options***

Please find the London Development Agency's (LDA) comments on the *Waltham Forest LDF Core Strategy – Proposed Submission* (CS) and the *Northern Olympic Fringe Area Action Plan: Preferred Options* (NOF AAP) set out below. These comments are solely with regard to an LDA-owned site located at the corner of Orient Way and the Lea Bridge Road. A map indicating the extent of the LDA ownership is attached overleaf.

The current PTAL rating at the site is 2/ 1b. We note that the Council has campaigned to reinstate the Hall Farm Curve rail service, which includes the reopening of Lea Bridge Station, located on the north side of the Lea Bridge Road. The aspiration to deliver this is included in the Core Strategy Pre-Submission document under *Policy CS1 – Location and Management of Growth* and under the NOF AAP Preferred Options document under *Policy NOF12 - Connectivity*. It could therefore be assumed that if the reinstatement of the rail service and the reopening of the Lea Bridge Station were to go ahead, the PTAL rating of the area would considerably improve.

already

The LDA also notes that the site adjacent, the Lea Bridge Gas Works section of the Lea Bridge Gateway, has been de-designated as SIL to encourage *"an opportunity to create a landmark mixed use development"* and that the site is *"well-connected to the existing residential grid"*.

in

included

With the above in mind, the LDA considers that, should significant improvements to public transport accessibility occur and the mixed use aspirations of the Gas works site are realised, the Council should consider potential alternative land uses, including mixed use development, for the Orient Way / Lea Bridge Road site in accordance with National Planning Policy. Furthermore, the LDA suggests the Council give consideration to presenting alternative mixed use development allocations, again on the basis that the above transport and development scenarios are realised within the emerging NOF AAP. The LDA recognises that this option is long term in nature and the site should be continued to be allocated as an employment site in the short to medium terms.

in

Representation

Form

On the basis of the information above, we trust that you will take these views into consideration. If you have any queries relating to this response, please do not hesitate to contact me.

Stephen Kennard
Director, Land & Development
For and on behalf of the London Development Agency

Respondent ID: 152278

22 Representations submitted (csps5 to csps22 and csps24 to csps27)

Comment on	Core Strategy Proposed Submission
Respondent ID	152278
Respondent	The Olympic Delivery Authority
Contact Person	Alex Savine, Chief Planner (Policy and Relationships)
Representation ID	csps5
Response Date	16/02/2011
Submission Type	Web
Consultation Point	Chapter 03 - Paragraph 3.5
Legal Compliance	Yes
Soundness	Yes
Unsound because it is not	N/A
Reasons for compliance and soundness	The vision is welcomed. First sentence of 3.5 'Quality Homes' could be reworded to read "Our new homes are of high quality and very sustainable". An additional reference to improved sustainability of existing properties could also be considered, e.g. "the energy water use efficiency of many existing homes have been improved too", as recognised in Policy CS5 (C).
Changes necessary for legal compliance and soundness	N/A
Oral Examination	NO
Reasons for oral examination	N/A
Attachment	Nil

Comment on Core Strategy Proposed Submission

Respondent ID	152278
Respondent	The Olympic Delivery Authority
Contact Person	Alex Savine, Chief Planner (Policy and Relationships)
Representation ID	csps6
Response Date	16/02/2011
Submission Type	Web
Consultation Point	Chapter 03 - Paragraph 3.6
Legal Compliance	Yes
Soundness	Yes
Unsound because it is not	N/A
Reasons for compliance and soundness	3.6 'Sustainable Transport - previous comments sought additional wording to indicate a potential for rail transport connections beyond East London, for example through national and international rail services via Stratford. While this has not been addressed in the final proposed wording this is not considered to be an issue of soundness for the Core Strategy and so no change is sought at this final consultation stage.
Changes necessary for legal compliance and soundness	N/A
Oral Examination	Not specified
Reasons for oral examination	N/A
Attachment	Nil

Comment on Core Strategy Proposed Submission

Respondent ID	152278
Respondent	The Olympic Delivery Authority
Contact Person	Alex Savine, Chief Planner (Policy and Relationships)
Representation ID	csps7
Response Date	16/02/2011
Submission Type	Web
Consultation Point	Chapter 03 - Paragraph 3.11
Legal Compliance	Yes
Soundness	Yes
Unsound because it is not	N/A
Reasons for compliance and soundness	Reference in 3,11 'Healthy Lifestyle' to the role of the 2012 Games and its Legacy both in terms of facilities and encouragement to healthier life styles, are welcomed.
Changes necessary for legal compliance and soundness	N/A
Oral Examination	NO
Reasons for oral examination	N/A
Attachment	Nil

Comment on Core Strategy Proposed Submission

Respondent ID	152278
Respondent	The Olympic Delivery Authority
Contact Person	Alex Savine, Chief Planner (Policy and Relationships)
Representation ID	csps8
Response Date	16/02/2011
Submission Type	Web
Consultation Point	Chapter 04 - Policy CS1- Location and Management of Growth
Legal Compliance	Yes
Soundness	Yes
Unsound because it is not	N/A
Reasons for compliance and soundness	<p>This policy is welcomed as appropriate in its content and approach. The final part 'G' refers to actions to implement the plan strategy including planning obligations and a tariff charging schedule. The reference to a 'tariff charging schedule should be revised to take account of the Community Infrastructure Regulations which prevent the use of local tariffs beyond 6th April 2014. This should also consider referencing the development of a Local Community Infrastructure Levy should it be decided to develop one for the borough, given that CIL will supersede tariffs at the above referenced point in time, as referenced in paragraph 4.44. Revise reference to refer to potential development of a local CIL to replace any tariff approach put in place and operated up to 6th April 2014.</p>
Changes necessary for legal compliance and soundness	N/A
Oral Examination	NO
Reasons for oral examination	N/A
Attachment	Nil

Comment on Core Strategy Proposed Submission

Respondent ID	152278
Respondent	The Olympic Delivery Authority
Contact Person	Alex Savine, Chief Planner (Policy and Relationships)
Representation ID	csps9
Response Date	16/02/2011
Submission Type	Web
Consultation Point	Chapter 04 - Figure 7 - Key Diagram
Legal Compliance	Yes
Soundness	Yes
Unsound because it is not	N/A
Reasons for compliance and soundness	At Issues and Options Stage the comments made welcomed the clarity of the Key Diagram and welcomed the inclusion of indicators of key external connections and influences within the regional and sub-regional setting. This continues to be the case at this stage and the way in which the Key Diagram is presented continues to be supported.
Changes necessary for legal compliance and soundness	N/A
Oral Examination	Not specified
Reasons for oral examination	N/A
Attachment	Nil

Comment on Core Strategy Proposed Submission

Respondent ID	152278
Respondent	The Olympic Delivery Authority
Contact Person	Alex Savine, Chief Planner (Policy and Relationships)
Representation ID	csps10
Response Date	16/02/2011
Submission Type	Web
Consultation Point	Chapter 05 - Paragraph 5.1
Legal Compliance	Yes
Soundness	Yes
Unsound because it is not	N/A
Reasons for compliance and soundness	Approach within the policy is welcomed, particularly in term of its relationship to the housing evidence base set out in the document. Previously, at Issues and Options stage, comment was made with regard to taking into account the projected programme for housing delivery in adjoining boroughs when indicating phasing for major sites and regeneration areas. It is recognised that the Core Strategy focuses on the maximisation of housing/housing land supply and that this point will practically need to be addressed when developing the relevant area action plans.
Changes necessary for legal compliance and soundness	N/A
Oral Examination	NO
Reasons for oral examination	N/A
Attachment	Nil

Comment on Core Strategy Proposed Submission

Respondent ID	152278
Respondent	The Olympic Delivery Authority
Contact Person	Alex Savine, Chief Planner (Policy and Relationships)
Representation ID	csps11
Response Date	16/02/2011
Submission Type	Web
Consultation Point	Chapter 06 - Policy CS3 - Making Efficient Use of Employment Land
Legal Compliance	Yes
Soundness	Yes
Unsound because it is not	N/A
Reasons for compliance and soundness	The Issues and Options response previously sought Clarification of areas or locations where employment land might be considered for release, in particular whether and how this might affect employment land and uses within the ODA boundary, essentially employment land at Temple Mills Lane. The Policy at Policy C3 (B) which focuses on the intensification and upgrading of employment uses in 'Borough Employment Areas' in conjunction with Table 6, that includes Temple Mills Lane. Provides the clarity that had been sought and this is welcomed.
Changes necessary for legal compliance and soundness	N/A
Oral Examination	NO
Reasons for oral examination	N/A
Attachment	Nil

Comment on Core Strategy Proposed Submission

Respondent ID	152278
Respondent	The Olympic Delivery Authority
Contact Person	Alex Savine, Chief Planner (Policy and Relationships)
Representation ID	csps12
Response Date	16/02/2011
Submission Type	Web
Consultation Point	Chapter 07 - Policy CS4 - Providing Infrastructure
Legal Compliance	Yes
Soundness	Yes
Unsound because it is not	N/A
Reasons for compliance and soundness	<p>The approach in the policy is broadly welcomed. However, the focus of the policy is towards securing infrastructure in association with housing growth. While this may represent the most significant opportunity for securing infrastructure or contributions to infrastructure, the policy could perhaps be more broadly cast and also set the scene for the introduction of Community Infrastructure Levy at point (E), in addition to reference to planning contributions. Consider revising first part of Policy to read by adding “economic” to the first paragraph after “encouraging housing and economic growth”, and by changing part E of the policy by adding “and other necessary” before “infrastructure”, deleting “or” before “through planning contributions” and adding “or through any applicable Community Infrastructure Levy” at the end. The policy would then read: “The Council will ensure that while encouraging housing and economic growth in the borough, appropriate infrastructure is provided to cater for the needs of existing and future populations, by: A) resisting the loss of and promoting the enhancement of existing social infrastructure facilities; B) maximising opportunities to deliver additional facilities as part of new developments, particularly on surplus employment land in line with Policy CS3; C) encouraging multi-purpose facilities that provide a range of services; D) ensuring that new facilities are located appropriately to cater to the communities they serve and are accessible by walking and cycling; E) Requiring new development to contribute towards the provision of social and other necessary infrastructure with contributions being either on-site, through planning contributions or through any applicable Community Infrastructure Levy.</p>

Changes necessary for legal compliance and soundness	N/A
Oral Examination	NO
Reasons for oral examination	N/A
Attachment	Nil

Comment on Core Strategy Proposed Submission

Respondent ID	152278
Respondent	The Olympic Delivery Authority
Contact Person	Alex Savine, Chief Planner (Policy and Relationships)
Representation ID	csps13
Response Date	16/02/2011
Submission Type	Web
Consultation Point	Chapter 08 - Policy CS5 - Minimising and Adapting to Climate Change
Legal Compliance	Yes
Soundness	Yes
Unsound because it is not	N/A
Reasons for compliance and soundness	At the Issues and Options stage consultation, the response sought the inclusion of a reference to a borough wide carbon reduction target. While not within the policy text, paragraph 8.8 includes reference to the Council's Climate Change Strategy which sets a 40% target for reduction in carbon emissions by 2025 against 2005 levels. This is said to be equivalent to the Mayor's 60% reduction target by 2025 against 1999 levels. This matter can, therefore, be considered to have been addressed. The content and wider scope of the policy continues to be considered appropriate.
Changes necessary for legal compliance and soundness	N/A
Oral Examination	NO
Reasons for oral examination	N/A
Attachment	Nil

Comment on Core Strategy Proposed Submission

Respondent ID	152278
Respondent	The Olympic Delivery Authority
Contact Person	Alex Savine, Chief Planner (Policy and Relationships)
Representation ID	csps14
Response Date	16/02/2011
Submission Type	Web
Consultation Point	Chapter 09 - Policy CS6 - Protection and Enhancement of the Natural Environment
Legal Compliance	Yes
Soundness	Yes
Unsound because it is not	N/A
Reasons for compliance and soundness	The policy is welcomed and considered appropriate in its scope. Previously, in response to the Issues and Options consultation, reference to protection of new and enhanced open space through measures such as Metropolitan Open Land designation. Paragraph 9.9 includes such a reference and uses the Olympic Park as an example of such new or enhanced open space. This is welcomed. The reference in Paragraph 9.31 to opportunities to deliver positive environmental impacts and enhanced opportunities for sport in the context of the Olympic Park is also welcomed.
Changes necessary for legal compliance and soundness	N/A
Oral Examination	NO
Reasons for oral examination	N/A
Attachment	Nil

Comment on	Core Strategy Proposed Submission
Respondent ID	152278
Respondent	The Olympic Delivery Authority
Contact Person	Alex Savine, Chief Planner (Policy and Relationships)
Representation ID	csps15
Response Date	16/02/2011
Submission Type	Web
Consultation Point	Chapter 10 - Policy CS7 - Sustainable Waste Management
Legal Compliance	Yes
Soundness	Yes
Unsound because it is not	N/A
Reasons for compliance and soundness	Policy Noted and supported.
Changes necessary for legal compliance and soundness	N/A
Oral Examination	NO
Reasons for oral examination	N/A
Attachment	Nil

Comment on Core Strategy Proposed Submission

Respondent ID	152278
Respondent	The Olympic Delivery Authority
Contact Person	Alex Savine, Chief Planner (Policy and Relationships)
Representation ID	csps16
Response Date	16/02/2011
Submission Type	Web
Consultation Point	Chapter 11 - Policy CS8 - Developing a Sustainable Transport Network
Legal Compliance	Yes
Soundness	Yes
Unsound because it is not	N/A
Reasons for compliance and soundness	Policy noted and supported. Previously, in the response to the Preferred Options consultation, diagrammatic of mapped references to locations requiring improvement to local connections, including those connections that cross the borough boundaries, were sought. Figure 19, transport connections, includes indication of the Hall Farm Curve proposal and shows existing strategic/cross boundary road and rail connections. It is acknowledged that the detail of specific improvements are likely to come forward through other plans, including Area Action Plans.
Changes necessary for legal compliance and soundness	N/A
Oral Examination	NO
Reasons for oral examination	N/A
Attachment	Nil

Comment on Core Strategy Proposed Submission

Respondent ID	152278
Respondent	The Olympic Delivery Authority
Contact Person	Alex Savine, Chief Planner (Policy and Relationships)
Representation ID	csps17
Response Date	16/02/2011
Submission Type	Web
Consultation Point	Chapter 12 - Policy CS9 - Promoting Better Education
Legal Compliance	Yes
Soundness	Yes
Unsound because it is not	N/A
Reasons for compliance and soundness	Policy Noted and supported
Changes necessary for legal compliance and soundness	N/A
Oral Examination	NO
Reasons for oral examination	N/A
Attachment	Nil

Comment on Core Strategy Proposed Submission

Respondent ID	152278
Respondent	The Olympic Delivery Authority
Contact Person	Alex Savine, Chief Planner (Policy and Relationships)
Representation ID	csps18
Response Date	16/02/2011
Submission Type	Web
Consultation Point	Chapter 13 - Policy CS10 - Creating More Jobs and Reducing Worklessness
Legal Compliance	Yes
Soundness	Yes
Unsound because it is not	N/A
Reasons for compliance and soundness	<p>Policy Noted and Supported. However, it is suggested that part (A) could be slightly reworded as suggested in the adjacent column, while part (B) could benefit from an updated reference to include reference to CIL in addition to tariffs. The wording in paragraph 13.12 should also be amended, given the lifetime of the Core Strategy, to recognise that the use of pooled S106 funding and tariffs become severely restricted beyond April 2014 and can only effectively be replaced by a local Community Infrastructure Levy. Amendments to the policy are suggested, for part A, after “locations”, to delete “in both” and add “as part of”, and after “new”, delete “and existing”. At the end of part A, delete the “s” at end of “developments” and following this add “or within established locations that present an appropriate opportunity”. For part B it is suggested that after “agreements”, “or financial contributions towards such provision from” is added, and after “Community Infrastructure Levy” the words “based system” are deleted. The policy would then read: “The Council will seek to maximise employment opportunities for its residents by: A) promoting the delivery of additional educational and training facilities in suitable locations, as part of new development or within established locations that present an appropriate opportunity. B ensuring provision is made where appropriate in new development for the recruitment and training of local residents, through S106 agreements, or financial contributions towards such provision from any future tariff of local Community Infrastructure Levy; C) supporting infrastructure improvements that enhance residents’ access to employment areas via public transport, foot and bicycle. Opportunities for the most vulnerable section of the community</p>

will be enhanced through focusing employment growth in the boroughs key growth areas. “

Changes necessary for legal compliance and soundness	N/A
Oral Examination	NO
Reasons for oral examination	N/A
Attachment	Nil

Comment on Core Strategy Proposed Submission

Respondent ID	152278
Respondent	The Olympic Delivery Authority
Contact Person	Alex Savine, Chief Planner (Policy and Relationships)
Representation ID	csps19
Response Date	16/02/2011
Submission Type	Web
Consultation Point	Chapter 14 - Policy CS11 - Tourism Development and Visitor Attractions
Legal Compliance	Yes
Soundness	Yes
Unsound because it is not	N/A
Reasons for compliance and soundness	The reference within Strategic Objective 11 and in paragraph 14.7 to the opportunities offered by the 2012 Olympic and Paralympic Games is welcomed as setting an appropriate context for the policy.
Changes necessary for legal compliance and soundness	N/A
Oral Examination	NO
Reasons for oral examination	N/A
Attachment	Nil

Comment on Core Strategy Proposed Submission

Respondent ID	152278
Respondent	The Olympic Delivery Authority
Contact Person	Alex Savine, Chief Planner (Policy and Relationships)
Representation ID	csps20
Response Date	16/02/2011
Submission Type	Web
Consultation Point	Chapter 15 - Policy CS12 - Protecting and Enhancing Heritage Assets
Legal Compliance	Yes
Soundness	Yes
Unsound because it is not	N/A
Reasons for compliance and soundness	Noted and supported
Changes necessary for legal compliance and soundness	N/A
Oral Examination	NO
Reasons for oral examination	N/A
Attachment	Nil

Comment on Core Strategy Proposed Submission

Respondent ID	152278
Respondent	The Olympic Delivery Authority
Contact Person	Alex Savine, Chief Planner (Policy and Relationships)
Representation ID	csps21
Response Date	16/02/2011
Submission Type	Web
Consultation Point	Chapter 16 - Policy CS13 - Promoting Health and Well Being
Legal Compliance	Yes
Soundness	Yes
Unsound because it is not	N/A
Reasons for compliance and soundness	The policy is noted and supported. The reference to maximising the benefits of the Olympic Legacy in the context of promoting health and well-being in part (G) of Policy CS13 and in paragraph 16.16 is welcomed.
Changes necessary for legal compliance and soundness	N/A
Oral Examination	NO
Reasons for oral examination	N/A
Attachment	Nil

Comment on	Core Strategy Proposed Submission
Respondent ID	152278
Respondent	The Olympic Delivery Authority
Contact Person	Alex Savine, Chief Planner (Policy and Relationships)
Representation ID	csps22
Response Date	16/02/2011
Submission Type	Web
Consultation Point	Chapter 17 - Policy CS14 - Attractive and Vibrant Town Centres
Legal Compliance	Yes
Soundness	Yes
Unsound because it is not	N/A
Reasons for compliance and soundness	<p>In response to the earlier Preferred Options consultation, it was suggested that this policy set out a strand of policy which deals with potential competition from nearby retail centres (outside of the borough) and in doing so emphasise the complementary roles that Waltham Forest centres can play in retail, service provision and other town centre related uses. The policy and accompanying text in this version of the Core Strategy addresses the town centre and retail hierarchy and relationship within the borough but not with those centres outside. Significant centres close to the borough such as Stratford will have a significant relationship with Waltham Forest and indeed this is reflected in the approach set out to office development in Policy CS3 and its accompanying text. While this may not impact on the soundness of the plans approach it would be helpful to set the approach to town centres within its wider sub-region and the functions of significant centres outside of the borough. Consider adding contextual text to this section to describe how the strategy sets the approach to borough town centres within its wider sub-regional context.</p>
Changes necessary for legal compliance and soundness	N/A
Oral Examination	NO
Reasons for oral examination	N/A
Attachment	Nil

Comment on	Core Strategy Proposed Submission
Respondent ID	152278
Respondent	The Olympic Delivery Authority
Contact Person	Alex Savine, Chief Planner (Policy and Relationships)
Representation ID	csps24
Response Date	16/02/2011
Submission Type	Web
Consultation Point	Chapter 18 - Policy CS15 - Well Designed Buildings, Places and Spaces
Legal Compliance	Yes
Soundness	Yes
Unsound because it is not	N/A
Reasons for compliance and soundness	Policy welcomed and supported.
Changes necessary for legal compliance and soundness	N/A
Oral Examination	NO
Reasons for oral examination	N/A
Attachment	Nil

Comment on Core Strategy Proposed Submission

Respondent ID	152278
Respondent	The Olympic Delivery Authority
Contact Person	Alex Savine, Chief Planner (Policy and Relationships)
Representation ID	csps25
Response Date	16/02/2011
Submission Type	Web
Consultation Point	Chapter 20 - Paragraph 20.1
Legal Compliance	Yes
Soundness	Yes
Unsound because it is not	N/A
Reasons for compliance and soundness	As for the Preferred Options version of the Core Strategy, the approach to delivery of social and physical infrastructure is welcomed, as is the reference to the role of Community Infrastructure Levy, although as highlighted in comments earlier in this table, those section of the Core Strategy should include revision in order to reference this approach. Coordinated working with agencies such as the Olympic Delivery Authority is also welcomed (although the reference to 'Olympic Delivery Agency' should be corrected to read 'Authority').
Changes necessary for legal compliance and soundness	N/A
Oral Examination	NO
Reasons for oral examination	N/A
Attachment	Nil

Comment on Core Strategy Proposed Submission

Respondent ID	152278
Respondent	The Olympic Delivery Authority
Contact Person	Alex Savine, Chief Planner (Policy and Relationships)
Representation ID	csps26
Response Date	16/02/2011
Submission Type	Web
Consultation Point	Chapter 20 - Paragraph 20.6
Legal Compliance	Yes
Soundness	Yes
Unsound because it is not	N/A
Reasons for compliance and soundness	<p>The Infrastructure Delivery Plan (IDP) is welcomed. It is nevertheless recommended that, in order to be considered sound, the IDP should be extended to embrace all known investment from private and voluntary sectors in addition to public sector investment. It would also be helpful to reference the evidence source(s) for the infrastructure items that are identified. It is assumed that a review process will be in place for updating the IDP within the lifetime of the Core Strategy and it would be helpful for this section to set out that review process. It should be noted that for the proposed Hall Farm Curve reinstatement that an element of funding is available through the Stratford City S106. Changes sought : Potential need for expansion of the IDP to embrace planned infrastructure from other public sector organisations and any investment planned by private and voluntary sector organisations and identification of an IDP review process. (Additional minor point of fact raised in main text).</p>
Changes necessary for legal compliance and soundness	N/A
Oral Examination	NO
Reasons for oral examination	N/A
Attachment	Nil

Comment on Core Strategy Proposed Submission

Respondent ID	152278
Respondent	The Olympic Delivery Authority
Contact Person	Alex Savine, Chief Planner (Policy and Relationships)
Representation ID	csps27
Response Date	16/02/2011
Submission Type	Web
Consultation Point	Chapter 07 - Appendix 1 - Table 8 - Infrastructure Delivery Plan
Legal Compliance	Yes
Soundness	Yes
Unsound because it is not	N/A
Reasons for compliance and soundness	The reference to bus improvement from Blackhorse Lane to Stratford should refer to the "Olympic Delivery Authority".
Changes necessary for legal compliance and soundness	N/A
Oral Examination	NO
Reasons for oral examination	N/A
Attachment	Nil

Respondent ID: 152301
10 Representations submitted
(csps118 – csps127)



Development Plan Document (DPD)

Publication Stage Representation Form

Waltham Forest LDF Core Strategy DPD

For office use only

Reference No: **152301**

Date received: **28/02/2011**

Representations can be made using this form or online:

<http://walthamforest-consult.limehouse.co.uk/portal>

If using this representation form, please return to the London Borough of Waltham Forest by 5pm on Monday, 28 February 2011

By post: Spatial Planning, Fir Tree House, London Borough of Waltham Forest,
Town Hall Complex, Walthamstow, London E17 4JF

By email: planning.policy@walthamforest.gov.uk

This form has two parts:

Part A – Personal details (only needed once irrespective of how many representations you make)

Part B – Your representation(s). Please complete a separate sheet for **every** representation you wish to make, remembering to insert your name or organisation's name.

Please read the guidance notes before completing this form.

PART A

	1. Personal details¹	2. Agent details (if applicable)
Title	Ms	
First name	Rose	
Last name	Freeman	
Job title (where relevant)	Planning Policy Officer	
Organisation (where relevant)	The Theatres Trust	
Address line 1		
Address line 2		
Address line 3		
Post town		
Post code		
Telephone number		
Email address		

¹ If an agent is appointed, please enter the person and/or organisation being represented in column 1 and complete all contact details in column 2

Part B

Please use a separate sheet for each representation

Name or organisation:

For office use only

Ref No: **csps118 – csps127**

3. To which part of the DPD does this representation relate?

Paragraph

Policy

4. Do you consider the Core Strategy DPD is:

(1) Legally Compliant

Yes

No

(2) Sound

Yes

Yes

No

If you have entered 'no' to 4(2), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is unsound because it is not:

(1) Justified

(2) Effective

(3) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

csps118

We support Policy CS3 generally as it includes encouragement for the creative/cultural industries.

csps119

We support Policy CS4 as it will resist the loss of existing social infrastructure and promote the enhancement of existing.

csps120

We support Policy CS11 which will encourage new leisure and cultural developments in Walthamstow Town Centre and look forward to being consulted on the AAP.

csps121

We support Policy CS14 which will direct new cultural uses to town centres and encourage an evening economy.

(continue on a separate sheet if necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Comments:

- csps122**

 - The Core Strategy extends to 238 pages which is unnecessarily long and although it does not undermine the soundness of the CS, it obscures its key themes and entails repetition and in many cases the reasoned justification contains more detail than is necessary or expands excessively on the policy it supports.
- csps123**

 - Para.2.27 states that *Culture does not presently have a high profile in Waltham Forest*. This statement is incorrect – the Borough is full of ‘culture’ - what it doesn’t have is a range of facilities for a variety of cultural activities, especially a cinema and a theatre. Libraries and two museums are good but inadequate for a cultural offer in a London Borough.
- csps124**

 - Para.17.4 states that *Waltham Forest has a relatively poor range of commercial, leisure, entertainment and cultural facilities*. We are pleased that Waltham Forest admits this deficiency but although residents may have good access to facilities in neighbouring Boroughs this is no excuse for not providing such facilities in your own Borough and contradicts the message in the Cultural Strategy.
- csps125**

 - Para.17.19 states that the plan *positively encourages* the provision of performance spaces for arts and cultural activities but this is clearly erroneous as we are unable to find a policy in the document that pursues this aspiration.
- csps126**

 - It is the only outer London Borough not to have an adequate cultural provision to match the other four Olympic Boroughs. The Cultural Strategy 2010-2030 implies that as *Waltham Forest is part of one of the world’s largest cultural centres* it does not need to offer cultural facilities to the Borough’s residents and visitors because these are provided within half an hour’s travelling to the West End (Foreword and page 4, first para.). Waltham Forest is culturally disadvantaged by having no arts centre, no theatre and no cinema and a priority must be therefore to upgrade and refurbish those existing venues that could provide some performance spaces.
- Included in csps126**

 - We recommend that the re-building of your cultural framework should be given some prominence in the Core Strategy to reflect the aspirations of your Cultural Strategy regarding the Borough’s provision for the arts and cultural venues that would make a positive contribution to a vibrant evening economy in Walthamstow.
- csps127**

 - The Glossary has separate descriptions for Community Facilities and Social Infrastructure and we suggest that these two terms have the same meaning and that, although it would be useful to keep the two entries, they should share a more succinct description such as - *community facilities and social infrastructure provide for the health, welfare, social, educational, spiritual, recreational, leisure and cultural needs of the community*. The same was suggested for the Glossary of your Development Management Policies document.

(continue on a separate sheet if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

(continue on a separate sheet if necessary)

Please note *the inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.*

Signature:

Rose Freeman

Date:

28 February 2011
(previously 23 February)

Respondent ID: 169546
1 Representation submitted (csps257)

Respondent ID: 169546
1 Representation submitted (csps257)

Web: www.coal.gov.uk/services/planning

Planning Policy Section
Waltham Forest

24 January 2011

[sent via email: planning.policy@walthamforest.gov.uk]

Dear Sir/Madam

Core Strategy – Proposed Submission

Thank you for consulting The Coal Authority on the above.

Representation ID:
csps257

Having reviewed your document, I confirm that we have no specific comments to make on this document at this stage.

Representation ID:
csps257

We look forward to receiving your emerging planning policy related documents; preferably in an electronic format. For your information, we can receive documents via our generic email address planningconsultation@coal.gov.uk, on a CD/DVD, or a simple hyperlink which is emailed to our generic email address and links to the document on your website.

Alternatively, please mark all paper consultation documents and correspondence for the attention of the Planning and Local Authority Liaison Department.

Should you require any assistance please contact a member of Planning and Local Authority Liaison at The Coal Authority on our departmental direct line (01623 637119).

With kind regards

Yours faithfully

Miss Rachael A. Bust *B.Sc.(Hons), MA, M.Sc., LL.M., AMIEnvSci., MIPSMA, MRTPI*
Deputy Head of Planning and Local Authority Liaison

Respondent ID: 183277

3 Representation submitted by email (csps237 – csps239)

From: Dennis Tilley

To: planning.policy@walthamforest.gov.uk

Date: 28/02/2011 17:43

Subject: Local Development framework -core strategy proposed submission, development management policies NO Area action plan

Dear Mr Glenday

csps237

The proposed plans are in the main too woolly, while some of the ideas could be very useful for improving our borough, it is quite clear that most will not get off the ground; due to the council's inability to get things moving and overcoming all the problems that relate to large scale improvements including even the smaller developments.

csps238

Monitoring is a key-word in some of this documentation, but it needs to be accurately monitored and action taken such as enforcement if required. The council have an abysmal record on enforcement and dealing with large scale projects for example. While the protection of our conservation areas is required, it will not succeed unless the necessary enforcement action is taken to protect them.

csps239

The areas of special character that should be mentioned in these plans is not considered such as my own the Belle Vue Park Estate, which is steeped in history and interesting family homes, and I have written to you over the last few years has been dismissed out of hand. These areas could have been included in the UDP or in the LDF.

Regards

Dennis Tilley

Respondent ID: 183298

5 Representations submitted (csps189 – csps193)

Development Plan Document (DPD)

Publication Stage Representation Form

Waltham Forest LDF Core Strategy DPD	For office use only
Representations can be made using this form or online: http://walthamforest-consult.limehouse.co.uk/portal	Reference No: 183298 Date received: 28/02/2011

If using this representation form, please return to the London Borough of Waltham Forest by 5pm on Monday, 28 February 2011

By post: Spatial Planning, Fir Tree House, London Borough of Waltham Forest, Town Hall Complex, Walthamstow, London E17 4JF

By email: planning.policy@walthamforest.gov.uk

This form has two parts:

Part A – Personal details (only needed once irrespective of how many representations you make)

Part B – Your representation(s). Please complete a separate sheet for **every** representation you wish to make, remembering to insert your name or organisation's name.

Please read the guidance notes before completing this form.

PART A

	1. Personal details*	2. Agent details (if applicable)
Title		Mr
First name		Andrew
Last name		Ransome
Job title (where relevant)		Director
Organisation (where relevant)	Workspace Group	Ransome and Company Ltd
Address	c/o Agent	
Post Code		
Telephone number		
Email address		

¹*If an agent is appointed, please enter the person and/or organisation being represented in column 1 and complete all contact details in column 2

Part B

Please use a separate sheet for each representation

For office use only
Ref No: **csps189**

Name or organisation:

3. To which part of the DPD does this representation relate?

Paragraph

Policy

4. Do you consider the Core Strategy DPD is:

(1) Legally Compliant Yes No

(2) Sound Yes No

If you have entered 'no' to 4(2), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is unsound because it is not:

(1) Justified

(2) Effective

(3) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Please see representation letter

(continue on a separate sheet if necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see representation letter

(continue on a separate sheet if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

(continue on a separate sheet if necessary)

Please note *the inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.*

Signature: _____

Date: _____ 28th February 2011 _____

If you wish to be informed of the date of the submission of the document to the Secretary of State, please tick this box.

Part B

Please use a separate sheet for each representation

For office use only
Ref No: **csps190**

Name or organisation:

3. To which part of the DPD does this representation relate?

Paragraph

Policy

4. Do you consider the Core Strategy DPD is:

(1) Legally Compliant

Yes

No

(2) Sound

Yes

No

If you have entered 'no' to 4(2), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is unsound because it is not:

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(continue on a separate sheet if necessary)

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(continue on a separate sheet if necessary)

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(continue on a separate sheet if necessary)

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Signature: _____

Date: _____ 28th February 2011 _____

If you wish to be informed of the date of the submission of the document to the Secretary of State, please tick this box.

Part B

Please use a separate sheet for each representation

Name or organisation:

For office use only
Ref No: **csps191**

3. To which part of the DPD does this representation relate?

Paragraph

Policy

CS3

4. Do you consider the Core Strategy DPD is:

(1) Legally Compliant

Yes

No

(2) Sound

Yes

No

If you have entered 'no' to 4(2), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is unsound because it is not:

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Please see representation letter

(continue on a separate sheet if necessary)

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Please see representation letter

(continue on a separate sheet if necessary)

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(continue on a separate sheet if necessary)

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Signature: _____

Date: _____ 28th February 2011 _____

If you wish to be informed of the date of the submission of the document to the Secretary of State, please tick this box.

Part B

Please use a separate sheet for each representation

Name or organisation: _____

For office use only
Ref No: **csps192**

3. To which part of the DPD does this representation relate?

Paragraph

Policy

4. Do you consider the Core Strategy DPD is:

(1) Legally Compliant

Yes

No

(2) Sound

Yes

No

If you have entered 'no' to 4(2), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is unsound because it is not:

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(2) Effective

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Please see representation letter

(continue on a separate sheet if necessary)

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(continue on a separate sheet if necessary)

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(continue on a separate sheet if necessary)

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Signature: _____

Date: _____ 28th February 2011 _____

If you wish to be informed of the date of the submission of the document to the Secretary of State, please tick this box.

Part B

Please use a separate sheet for each representation

Name or organisation:

For office use only
Ref No: **csps193**

3. To which part of the DPD does this representation relate?

Paragraph

Policy

4. Do you consider the Core Strategy DPD is:

(1) Legally Compliant

Yes

No

(2) Sound

Yes

No

If you have entered 'no' to 4(2), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is unsound because it is not:

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(2) Effective

(3) Consistent with national policy

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Please see representation letter

(continue on a separate sheet if necessary)

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Please see representation letter

(continue on a separate sheet if necessary)

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(continue on a separate sheet if necessary)

Please note *the inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.*

Signature: _____

Date: _____ 28th February 2011 _____

If you wish to be informed of the date of the submission of the document to the Secretary of State, please tick this box.

28th February 2010

Spatial Planning Unit
Environment and Regeneration
London Borough of Waltham Forest
Fir Tree House
Waltham Forest Town Hall
Forest Road
Walthamstow
London E17

BY EMAIL (planning.policy@walthamforest.gov.uk)

Dear Sir,

LONDON BOROUGH OF WALTHAM FOREST: CORE STRATEGY: PROPOSED SUBMISISON

ON BEHALF OF WORKSPACE GROUP PLC

We act on behalf of Workspace Group, who owns the following sites within the London Borough of Waltham Forest:

- Leyton Industrial Village, Argall Avenue, Leyton, London, E10 7QE;
- Leyton Studios, 15 Argall Avenue, Leyton, London, E10 7QE;
- Fairways Business Park, Lammas Road, Leyton, London, London, E10 7QT; and
- Alpha Business Centre, 60 South Grove, Greater London, E17 7NX.

Workspace Group is a specialised property based business that provides office, studio and light industrial workspace for predominantly small and medium sized enterprises. Workspace provides good value, small unit employment accommodation for rent in London and the South East and manages 5.7 million sq ft of accommodation across 100 estates across London with more than 4,000 tenants. As such, Workspace provides a significant contribution to London's economy and has first hand experience of the changes in property market conditions.

Workspace has increased the range of units on offer and tenant diversity, whilst providing economies of scale in terms of management and marketing. The result is a substantial and diverse portfolio, able to meet the needs of London's dynamic small business community.

Policy CS1 – Location and Management of Growth (csps189)

Workspace supports the identification of Blackhorse Lane and Northern Olympic Fringe as key growth areas for regeneration activities.

Workspace supports (E) where it seeks to accommodate growth on previously developed land. However, it is consider that **part (E)(iii) is not effective** as it lacks flexibility and could

inadvertently prevent modern economic floorspace from being delivered that could increase local employment opportunities and increase economic output and wealth. By safeguarding land for employment use, the policy could potentially sterilise employment land and prevent regeneration benefits from being delivered.

To make this policy sound it should be reworded to state:

“Land within employment use will be utilised for economic purposes, ensuring that the best and most suitable sites and premises are retained for employment use. Redevelopment opportunities will be encouraged where high-quality employment floorspace is delivered”

Policy CS2 - Improving Housing Quality and Choice (csps190)

Workspace supports (A) which seeks to facilitate sustainable housing growth with focus upon delivering new homes in Waltham Forest’s key growth areas including Blackhorse Lane and the Northern Olympic Fringe.

However, overall Workspace considers that Policy CS2 is unsound on the basis that it is not consistent with national planning policy and is not effective.

It does not appear to be based on an affordable housing viability assessment. There is no information on the Council’s website to suggest that this assessment has been undertaken. Workspace considers that the requirement to provide a minimum of 50% affordable housing on development sites to be unsound as it not based reliable information and that this approach will potentially impact upon the viability of development schemes in the borough. It does not take account of market conditions and that Waltham Forest is generally a low-value area compared with other parts of London. This policy therefore does not sufficiently take account the risks of delivery as prescribed by PPS3 in paragraph 29.

The Council’s ‘Waltham Forest Housing Need and Market Assessment (2007)’ states in paragraph 1.12.5 that each site will need to be assessed individually with targets being subject to wider planning, economic viability, regeneration and sustainability considerations and will require a flexible approach to specific site negotiation.

It is considered that for the policy to be considered sound it needs to redrafted to take account of paragraph 1.12.5 of the ‘Waltham Forest Housing Need and Market Assessment (2007)’.

The requirement for 60% of affordable to social rented housing and 40% to be intermediate housing is inflexible. Paragraph 1.12.10 of the ‘Waltham Forest Housing Need and Market Assessment (2007)’ states that both the affordable housing target and the tenure balance within it may vary on a site by site basis. Workspace supports the approach to have higher levels of intermediate housing as part of the affordable housing mix. It is important the proposed tenure mix is indicative only and open to negotiation, whereby issues such as a scheme's viability and the economic and social benefits of regeneration are taken into consideration. Workspace would support a higher proportion of shared ownership and other intermediate housing as part of the affordable housing mix as this can have a considerable bearing upon the viability of redevelopment proposals.

To make this policy sound, it should be redrafted to state:

“An indicative tenure mix of 60:40 between social rented accommodation and intermediate housing will be sought. Where it is considered that the affordable housing dwelling tenure mix is not appropriate, applicants will be required to justify a more appropriate mix. The Council will take into consideration factors such as the latest available affordable housing evidence, the site context and viability”

Policy CS3 - Making Efficient Use of Employment Land (csps191)

Workspace supports the principle of Policy CS3(d) in that it seeks to encourage a mix of employment facilities and types, including the provision of space for small and medium sized enterprises, and creative and cultural industries. However, **Workspace considers that this policy is unsound on the basis that it is not effective.**

This policy states that such enterprises will be encouraged in Borough Employment Areas. The policy however does not take account of the locational needs of these enterprises, regeneration opportunities or the delivery of employment space for these enterprises.

Workspace considers that small and medium sized enterprises, and creative and cultural industries should also be encouraged within the Strategic Industrial Locations.

Workspace considers that the Core Strategy needs a stronger emphasis within the policy that strategically considers the needs and growth of small and medium sized enterprises, and creative and cultural industries. Small and medium sized enterprises, and creative and cultural industries provide an important and significant contribution to the Waltham Forest economy. The potential economic and social benefits of promoting the development of small and medium enterprises include:

- The creation of jobs at low cost of capital;
- Contribution to the Gross Domestic Product (GDP);
- Expansion of the entrepreneurial base;
- Flexibility to adapt to market changes;
- Support for large scale enterprises;
- Entry into market niches which are not profitable for larger enterprises.

All the above may never be fully realised if such enterprises are not encouraged throughout the borough including on Strategic Industrial Locations, which can provide an adequate and encouraging environment and suitable available property in which to develop.

Small and medium sized enterprises and creative and cultural industries often operate within clusters and networks. Networking allows the small and medium sized enterprises to combine the advantages of smaller scale and greater flexibility with economies of scale and scope in larger markets – regionally, nationally and globally. The links take different shapes in which different firms join together to co-produce, co-market, or co-purchase, cooperate in new product development, or share of information. It is important that these clusters and networks are supported and developed by the provision of appropriate accommodation at a variety of locations, including on Strategic Industrial Locations.

Small and medium sized enterprises, and creative and cultural industries are a significant aspect of the economy in that they employ a significant proportion of Waltham Forest’s workforce and responsible for more than half of business turnover. Their average productivity has increased faster than larger firms in the last decade. Small and medium

sized, and creative and cultural industries have a particular importance in terms of local economies and creating job growth. More generally, there is a complimentary role alongside large companies. It is also evident that small and medium sized enterprises have an important role in leading entry into emerging sectors.

Workspace considers that the Policy CS3 (a) and (b) are both not sound on the basis that they are ineffective and could prevent land from utilised for more effective land uses. This policy should allow the redevelopment of inefficient employment areas for mixed-use developments that incorporate modern and flexible employment floorspace for small and medium sized enterprises. New employment floorspace will help sustain existing employment use at such sites and enables sufficient flexibility and building quality to secure its continued use in the longer term. This will provide benefit in employment and economic terms through continuing to provide opportunities for a wide variety of small and medium sized businesses. The associated higher value land use as part of a mixed-use development will secure the delivery of this employment floorspace. Without this higher value element, the redevelopment would be unviable. The securing of planning permission of the Aberdeen Centre in the London Borough of Islington has demonstrated how this can be achieved.

Workspace considers that the Figure 11 is unsound on the basis that it is not effective. This figure should have excluded the Uplands Business Park from the Strategic Industrial Location designation.

Uplands Business Park extends to approximately 4.7ha. The estate is characterised by single storey industrial units built of basic brick and concrete construction and pitched corrugated iron roofs.

The buildings on the site do not contribute positively to the surrounding residential area or the adjacent Lea Valley Regional Park. There is evidence of decay to the structure of these buildings. The industrial buildings are clearly visible from Blackhorse Road and are of a design that is out of character of the surrounding area.

The industrial buildings are characterised by a series on long narrow industrial units that provide poor lighting that creates poor working conditions. The arrangement of the internal space is inefficient for the needs of modern industry.

The site is characterised as being low-grade employment accommodation that lacks sufficient demand as emphasised by the high vacancy rates. These employment units have no strategic value and given their condition do not meet the needs of businesses in Waltham Forest or London. The Uplands Business Park currently offers office, studio and light industrial space. However, these industrial units are in need of upgrading and modernising to meet the requirements of modern business. The cost of maintaining Uplands Business Park has risen over recent years, which has led to an increase of service charges being passed on to the tenants. The refurbishment of the existing building is not a viable option to Workspace as the buildings have past the end of their economic cycle and the existing buildings may only be maintained in the short term. The existing layout is inefficient with the majority of the accommodation being single storey and poorly sited. This layout and the arrangement and nature of the buildings are not suitable for use by modern business.

Workspace consider that this site should be removed from the Strategic Industrial Location designation. Workspace considers that this site should instead be allocated as a mixed-use development site that incorporates residential and employment uses. The allocation of this

site for mixed-use development will provide an opportunity to improve the quality of the built environment at this site, enhance the surrounding area and increase the economic output of this area and increase jobs for local people.

The introduction of new commercial floorspace would accommodate the future needs of modern economy and would have a considerably longer economic cycle than can be achieved by the refurbishment of the existing buildings. New employment floorspace will help sustain the existing employment use and will enable sufficient flexibility and building quality to secure its continued use in the longer term. This will provide benefit in employment and economic terms through continuing to provide opportunities for a wide variety of small and medium sized businesses. The associated housing development as part of a mixed-use development will secure the delivery of this employment floorspace. Without the housing element, the redevelopment would be unviable.

Policy CS5 - Minimising and Adapting to Climate Change (csps192)

Workspace considers that Policy CS5 is unsound on the basis that it is not consistent with national planning policy and is not effective. This policy fails to refer to viability or feasibility and as such is not compliant with PPS1 and its supplement.

Workspace objects to this policy on the basis that significant changes to national policy result in this policy not being necessary. There have been significant changes to the legislative and policy framework through the Climate Change Act, the Low Carbon Transition Plan and Renewable Energy Strategy and amendments to Part L of the Building Regulations, which demonstrates the Government's ambitions on reducing carbon emissions and delivering renewable energy. The Climate Change Act 2008 introduced a statutory target of reducing carbon emissions by 80 percent below 1990 levels by 2050, with an interim target of 34% by 2020. These ambitions are in the process of being reflected in the national planning framework and through building regulations. It is considered that the current London Plan (2004 consolidated with changes), the emerging draft London Plan (2009) and Part L of the Buildings Regulations will provide sufficient policy cover.

Furthermore, under the heading 'Testing Local Requirements' paragraph 33 of the PPS1 climate change supplement advises that any policy relating to local requirements for energy supply should ensure that what is proposed is evidenced based and viable having regard to overall costs of bringing sites to the market. In the case of housing development it is stated that the policy approach should demonstrate that the proposed approach is consistent with securing the expected supply and pace of development shown in the housing trajectory required by PPS3 and does not inhibit the provision of affordable housing.

Policy CS15 - Well Designed Buildings, Places and Spaces (csps193)

Workspace considers that Policy CS15 is unsound on the basis that it is not effective. Whilst Workspace supports the promotion of high quality design in new developments that create unique places with a local character, it is considered that the policy is too inflexible and makes no allowance for other factors. The policy places the highest quality of design above all other planning considerations, such as feasibility and viability. The policy focuses too much on high-quality architectural design and townscape, at the expense of a variety of environmental, social and economic factors that should have a strong influence on the design of sustainable development.

Conclusion

I trust that the comments, made on behalf of Workspace, to the Core Strategy: Proposed Submission will be considered, however should you require clarification on any matters raised above, please do not hesitate to contact me.

Yours faithfully,

Andrew Ransome MRTPI

Director

cc  Workspace Group Plc

Respondent ID: 183683

4 Representations submitted (IDs: csps176 - csps179)



Development Plan Document (DPD)

Publication Stage Representation Form

Waltham Forest LDF Core Strategy DPD

For office use only

Reference No: 183683

Date received: 28/02/2011

Representations can be made using this form or online:

<http://walthamforest-consult.limehouse.co.uk/portal>

If using this representation form, please return to the London Borough of Waltham Forest by 5pm on Monday, 28 February 2011

By post: Spatial Planning, Fir Tree House, London Borough of Waltham Forest,
Town Hall Complex, Walthamstow, London E17 4JF

By email: planning.policy@walthamforest.gov.uk

This form has two parts:

Part A – Personal details (only needed once irrespective of how many representations you make)

Part B – Your representation(s). Please complete a separate sheet for **every** representation you wish to make, remembering to insert your name or organisation's name.

Please read the guidance notes before completing this form.

PART A

	1. Personal details*	2. Agent details (if applicable)
Title		MR
First name		MARK
Last name		UNDERWOOD
Job title (where relevant)		DIRECTOR
Organisation (where relevant)	NORTH EAST LONDON NHS FOUNDATION TRUST	DRIVERS JONAS DELOITTE
Address	C/O AGENT	
Post Code		
Telephone number		
Email address		

*If an agent is appointed, please enter the person and/or organisation being represented in column 1 and complete all contact details in column 2

Part B

For office use only
Ref No. csps176

Please use a separate sheet for each representation

Name or organisation: _____

3. To which part of the DPD does this representation relate?

Paragraph Policy

4. Do you consider the Core Strategy DPD is:

- (1) Legally Compliant Yes No
- (2) Sound Yes No

If you have entered 'no' to 4(2), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is unsound because it is not:

- (1) Justified
- (2) Effective
- (3) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

NELFT WELCOMES THE OVERRIDING PRINCIPLE OF DIRECTING NEW DEVELOPMENT TOWARDS PREVIOUSLY DEVELOPED LAND, IN ACCORDANCE WITH GUIDANCE SET OUT IN PLANNING POLICY STATEMENT 1: PLANNING FOR SUSTAINABLE DEVELOPMENT, AND THE USE OF KEY SITES FOR GREATER INTENSIFICATION OF ACTIVITIES. NELFT ALSO ACKNOWLEDGES THE IMPORTANCE OF DELIVERING ESSENTIAL INFRASTRUCTURE TO SUPPORT GROWTH WITHIN THE BOROUGH. HOWEVER, NELFT WISHES TO EMPHASISE THAT SOCIAL INFRASTRUCTURE IN PARTICULAR NEEDS TO BE APPROPRIATE TO THE REQUIREMENTS OF THE GROWING POPULATION. WHERE INFRASTRUCTURE, PARTICULARLY HEALTHCARE, CAN BE DEMONSTRATED TO BE REDUNDANT, POLICIES SHOULD BE SUFFICIENTLY FLEXIBLE TO ALLOW FOR THE CONSOLIDATION OF HEALTHCARE FACILITIES ACROSS THE BOROUGH WHERE THEY CAN CONTINUE TO PROVIDE A HIGH QUALITY OF SERVICE.

(continue on a separate sheet if necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

N/A

(continue on a separate sheet if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

N/A

(continue on a separate sheet if necessary)

Please note the inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature: _____

FOR DELOITTE LLP (TRADING AS
DRIVERS JONAS DELOITTE)

Date: 28/02/2011 _____

If you wish to be informed of the date of the submission of the document to the Secretary of State, please tick this box.

Part B

Please use a separate sheet for each representation

Name or organisation: _____

For office use only
Ref No. csps177

3. To which part of the DPD does this representation relate?

Paragraph Policy

4. Do you consider the Core Strategy DPD is:

- (1) Legally Compliant Yes No
- (2) Sound Yes No

If you have entered 'no' to 4(2), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is unsound because it is not:

- (1) Justified
- (2) Effective
- (3) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

NELFT ACKNOWLEDGES THE IDENTIFIED NEED FOR SUSTAINABLE HOUSING GROWTH WITHIN THE BOROUGH, AND FOR THE NEED FOR A RANGE OF HOUSING TYPES, INCLUDING AFFORDABLE HOUSING AND HOUSING FOR OLDER AND VULNERABLE PEOPLE. WITH THE EMPHASIS ON NEW DEVELOPMENT TAKING PLACE ON PREVIOUSLY DEVELOPED LAND, IT MAY BE POSSIBLE TO PROVIDE NEW HOUSING DEVELOPMENT ON FORMER HEALTHCARE SITES IF THEY BECOME REDUNDANT IN FUTURE. IN DELIVERING NEW HOUSING, SITES SHOULD NOT BE LIMITED TO THOSE CONSIDERED IN THE GLA'S STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT; WINDFALL SITES WILL HAVE A SIGNIFICANT ROLE TO PLAY, PARTICULARLY WHERE DELIVERY OF LARGE SITES HAS BEEN HINDERED BY THE RECENT ECONOMIC DOWNTURN.

(continue on a separate sheet if necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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N/A

(continue on a separate sheet if necessary)

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No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

N/A

(continue on a separate sheet if necessary)

Please note the inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature: _____

FOR DELOITTE LLP (TRADING AS
DRIVERS JONAS DELOITTE)

Date: 28/02/2011 _____

If you wish to be informed of the date of the submission of the document to the Secretary of State, please tick this box.

Part B

For office use only
Ref No: csps178

Please use a separate sheet for each representation

Name or organisation: _____

3. To which part of the DPD does this representation relate?

Paragraph

Policy

CS4

4. Do you consider the Core Strategy DPD is:

(1) Legally Compliant

Yes

No

(2) Sound

Yes

No

If you have entered 'no' to 4(2), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is unsound because it is not:

(1) Justified

(2) Effective

(3) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

WITH A PROJECTED INCREASE IN THE RESIDENT POPULATION OF THE BOROUGH, NELFT ACKNOWLEDGES THE NEED FOR THE PROVISION OF APPROPRIATE INFRASTRUCTURE TO SUPPORT DEVELOPMENT. HOWEVER, NELFT CONSIDERS THAT THERE NEEDS TO BE MORE FLEXIBILITY IN THE APPLICATION OF THIS POLICY, PARTICULARLY WITH RESPECT TO HEALTHCARE AND OTHER PUBLIC SERVICES. PRESSURES FOR EFFICIENCY SAVINGS AND REDUCED MANAGEMENT COSTS ARE PIONEERED BY THE GOVERNMENT WHITE PAPER "EQUITY AND EXCELLENCE: LIBERATING THE NHS" (JULY 2010). AS SUCH, THE SALE OF REDUNDANT AND UNDERUSED SITES IS AN INCREDIBLY IMPORTANT ELEMENT OF EFFICIENCY SAVINGS. THIS POLICY, AND THE SUPPORTING TEXT, SHOULD THEREFORE TAKE GREATER ACCOUNT OF THE NEED FOR THIS FLEXIBILITY, AND SHOULD NOT RESTRICT HEALTHCARE SITES TO SOLELY HEALTHCARE USES IN FUTURE.

(continue on a separate sheet if necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the inspector, based on the matters and issues he/she identifies for examination.

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

N/A

(continue on a separate sheet if necessary)

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No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

N/A

(continue on a separate sheet if necessary)

Please note the inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature: _____

FOR DELOITTE LLP (TRADING AS
DRIVERS JONAS DELOITTE)

Date: 28/02/2011 _____

If you wish to be informed of the date of the submission of the document to the Secretary of State, please tick this box.

Part B

For office use only
Ref No: csps179

Please use a separate sheet for each representation

Name or organisation: _____

3. To which part of the DPD does this representation relate?

Paragraph

Policy

4. Do you consider the Core Strategy DPD is:

(1) Legally Compliant Yes No

(2) Sound Yes No

If you have entered 'no' to 4(2), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is unsound because it is not:

(1) Justified

(2) Effective

(3) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

NELFT WELCOMES LBWF'S PRIORITY TO PROMOTE THE HEALTH AND WELL-BEING OF THE BOROUGH'S RESIDENTS, INCLUDING IMPROVED ACCESS TO THE BOROUGH'S HEALTH FACILITIES AND SERVICES.

(continue on a separate sheet if necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

N/A

(continue on a separate sheet if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

N/A

(continue on a separate sheet if necessary)

Please note the inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature: _____

FOR DELOITTE LLP (TRADING AS
DRIVERS JONAS DELOITTE)

Date: 28/02/2011 _____

If you wish to be informed of the date of the submission of the document to the Secretary of State, please tick this box.

Respondent ID: 183754

1 Representation submitted (csps34)

Comment on	Core Strategy Proposed Submission
Respondent ID	183754
Respondent	Lee Valley Regional Park Authority
Contact Person	Mr Stephen Wilkinson, Head of Planning and Regeneration
Representation ID	csps34
Response Date	23/02/2011
Submission Type	Web
Consultation Point	Chapter 04 - Figure 7 - Key Diagram
Legal Compliance	Yes
Soundness	No
Unsound because it is not	(2) Effective
Reasons for compliance and soundness	The Regional Park as a strategic open space asset and major visitor destination within the Borough should be identified on the Key Diagram, particularly in relation to its inclusion within the Upper and Lower Lea Valley Opportunity Areas. It is hoped that this can be treated as a minor amendment by the Council without the need for further representations.
Changes necessary for legal compliance and soundness	Both the Core Strategy and the Development Management Policies Development Plan Documents will contain policies that guide and control development and the use of land within the Borough. As a substantial area of the Regional Park lies within the London Borough of Waltham Forest, (approximately 557.8 hectares, or 14% of the total Park area) this will be an important document in terms of the protection, enhancement, development and management of the Regional Park and the public enjoyment of its leisure, nature conservation, recreational and sporting resources. The Lee Valley Regional Park Authority is a statutory authority created by the Lee Valley Regional Park Act 1966 (the Park Act). It has a statutory responsibility to either provide directly or work with partners to provide facilities for sport, recreation, leisure, entertainment and nature conservation throughout the 4,000ha of the Park. It has a political membership comprised of councillors drawn from across London, Hertfordshire and Essex, from both Riparian and Non-riparian authorities, although the majority of our Members are drawn from the riparian boroughs. Councillor Bob Sullivan represents your council on the Authority. Section 14 (1) of the Park Act requires the Authority to prepare a plan setting

out proposals for the future management and development of the Regional Park. Of particular concern to the Authority in responding to consultations on the above documents is the fact that Riparian planning authorities are under a mandatory obligation to include those parts of the plan affecting their area within their own relevant planning strategies and policies (Section 14(2) (a)) although inclusion does not infer that the planning authority necessarily agrees with them (Section 14 (2) (b)). For the purposes of the Park Act the London Borough of Waltham Forest is a riparian Authority. For the purposes of section 14 of the Lee Valley Regional Park Act 1966 the Park Plan (Parts 1&2) 2000 (Park Plan 2000), is still the adopted s.14 Plan of the Authority. The Park Development Framework (PDF) Vision, Strategic Aims and Principles and the Thematic Proposals have been adopted by the Authority as a statement setting out the Park Authority's aspirations for future development and management. The PDF will eventually be supported by a series of area based proposals covering all land within the Park. These area based proposals will in due course amend either in part or in its entirety the Park Plan 2000 for the purposes of s.14. It should be noted that the PDF is consistent with the Park Plan 2000 and our remit. Accordingly both the Park Plan 2000 and the PDF are relevant in terms of Section 14 (2) of the Park Act and are formal statements of the Authority's position in respect of development within the Regional Park. The Authority welcomes the changes that have been made to the Core Strategy and the numerous references to the Regional Park which are now included throughout the Proposed Submission document. Policy and supporting text under CS1 Location and Management of Growth, CS5 Minimising and Adapting to Climate Change, CS6 Enhancing Green Infrastructure and Biodiversity, CS11 Tourism Development and Visitor Attractions and CS13 Promoting Health and Well Being are supported. These references demonstrate a coherence and consistency with the policies and proposals of the Authority as set out in the Park Plan and emerging PDF and support the Authority's role as a delivery partner within the Borough. Given these references in policy and supporting text, the significant role of the Regional Park and Authority within Waltham Forest and the requirements under the Park Act, the Core Strategy Key Diagram should identify the Regional Park as a key component of the Borough.

Oral Examination	NO
Reasons for oral examination	N/A
Attachment	Nil

Our ref:
Your ref: Planning Services

Spatial Planning Unit
Fir Tree House
Waltham Forest Town Hall Complex
Forest Road
London E17 4JF

Respondent ID: 183809
1 Representation submitted
(ID: csps258)
Date received: 24/02/2011

24 February 2011

Dear Mr Glenday

LONDON BOROUGH OF WALTHAM FOREST CORE STRATEGY PROPOSED SUBMISSION; DEVELOPMENT MANAGEMENT POLICIES PREFERRED OPTIONS; AND NORTHERN OLYMPIC FRINGE AREA ACTION PLAN PREFERRED OPTIONS CONSULTATIONS.

1. Thank you for inviting the Highways Agency (HA) to comment on the above documents produced by the London Borough of Waltham Forest.

2. As you may have noted from our previous correspondence, the HA is an executive agency of the Department for Transport (DfT). We are responsible for operating, maintaining and improving England's Strategic Road Network¹ (SRN) on behalf of the Secretary of State for Transport. In the case of the Waltham Forest area this relates chiefly to the southernmost section of the M11, which is located to the east of the Borough. Furthermore, the M25 can be reached via the M11 to the north of Waltham Forest. We would be concerned if any material increase in traffic were to occur in these areas as a result of development in Waltham Forest without careful consideration of mitigation measures.

3. DfT circular 02/2007² (Planning and the Strategic Road Network) sets out how the HA will take part in the development of Local Development Frameworks from the earliest stages.

4. Please see below our comments regarding the Core Strategy Proposed Submission; Development Management Policies Preferred Options; and Northern Olympic Fringe Area Action Plan Preferred Options which have been assessed from a transport perspective in accordance with PPS12 and other relevant national policy documents.

Core Strategy – Proposed Submission

Representation ID

csps
258

5. The HA does not have any further comments to make with regards to the Core Strategy Proposed Submission document.

¹ "Strategic Road Network" refers to England's trunk motorways and all-purpose roads.

² <http://www.dft.gov.uk/psr/regional/strategy/policy/circular207planningandstrategic>

Respondent ID: 184020
 3 Representations submitted (IDs: csps162 - csps164)



Development Plan Document (DPD)

Publication Stage Representation Form

Waltham Forest LDF Core Strategy DPD	<u>For office use only</u>
	Reference No: 184020 Date received: 28/02/2011

Representations can be made using this form or online:

<http://walthamforest-consult.linchouse.co.uk/portal>

If using this representation form, please return to the London Borough of Waltham Forest by 5pm on Monday, 28 February 2011

By post: Spatial Planning, Fir Tree House, London Borough of Waltham Forest,
 Town Hall Complex, Walthamstow, London E17 4JF

By email: planning.policy@walthamforest.gov.uk

This form has two parts:

Part A – Personal details (only needed once irrespective of how many representations you make)

Part B – Your representation(s). Please complete a separate sheet for every representation you wish to make, remembering to insert your name or organisation's name.

Please read the guidance notes before completing this form.

PART A

	1. Personal details*	2. Agent details (if applicable)
Title	MR	
First name	ALEC	
Last name	ARRDL	
Job title (where relevant)	DEVELOPMENT PLANNING MANAGER	
Organisation (where relevant)	KENNET PROPERTIES LIMITED	
Address		
Post Code		
Telephone number		
Email address		

*If an agent is appointed, please enter the person and/or organisation being represented in column 1 and complete all contact details in column 2

Part B

Please use a separate sheet for each representation

Name or organisation: _____

For office use only Ref No: csps162 support: object omission xxxxxxx

3. To which part of the DPD does this representation relate?

Paragraph TABLE AS2
PROPOSED CHANGES
TO 2006 UDP PROPOSALS MAP Policy METROPOLITAN OPEN
LAND

4. Do you consider the Core Strategy DPD is:

(1) Legally Compliant Yes No

(2) Sound Yes No

If you have entered 'no' to 4(2), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is unsound because it is not:

(1) Justified

(2) Effective

(3) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

PLEASE SEE ATTACHED SHEET:

(continue on a separate sheet if necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Section 6: Table A5.2 – Proposed changes to 2006 UDP Proposals Map

On page 208 the document sets out that under Metropolitan Open Land (MOL) there are no proposed changes to the existing MOL designations. MOL designation is a London specific policy which protects strategically important open spaces within the built environment. The London Plan specifies that land designated as MOL should satisfy one or more of the following criteria:

- Land that contributes to the physical structure of London by being clearly distinguishable from the built-up area;
- Land that includes open air facilities, especially for leisure, recreation, sport, arts, cultural activities and tourism which serve the whole, or significant parts of London;
- Land that contains features or landscapes of historic, recreational, nature conservation or habitat interest, of value at a metropolitan or national level;
- Land that forms part of a Green Chain **and** meets one of the above criteria [emphasis added by KPL]

It is KPL's case that the Thames Water (TW) Depot Site, Lea Bridge Road, does not satisfy any of these conditions. This is further demonstrated by comparing the nature of the TW Depot Site with the three functions that MOL performs, as identified in the London Plan:

- Protecting open space to provide a clear break in the urban character **and** contributing to the green character of London [emphasis added by KPL];
- Protecting open space to serve the needs of Londoners outside their local area;
- Protecting open space that contains a feature or landscape of national or regional importance.

The TW Depot Site is used as a mixture of office, workshops, storage and open storage uses, as well as TW direct operational usage for the siting of operational plant and infrastructure. Further to this KPL would highlight the following points:

- There is no public accessibility into the site;
- The vast majority of the site is hard surfaced with very little vegetation;
- There is limited visibility into the site;
- A number of permanent buildings exist on site, which has a built-up appearance;

The TW Depot Site is surrounded by land that can clearly pass the tests for MOL designation i.e. it is green, contains considerable amenity value and acts to provide a clear break in the built environment. However, the TW Depot site has no similar characteristics to this land. Indeed, it is more similar in character, quality and function with the Essex Wharf site which is immediately north west of the TW Depot Site, which is not designated as MOL. It is therefore unclear under what basis the TW Depot Site is considered to fulfil the functions of MOL and therefore warrant the designation.

As part of the Core Strategy evidence base Urban Practitioners have undertaken a number of studies on behalf of LBWF. It is assumed that this work informed the decision as to whether the existing MOL designations should be retained. The Characterisation Study of LBWF appears to completely misclassify the TW Depot Site. On page 25 the site is identified as 'recreation in green open space'. Further in the document the site is then classified as 'green open space'. In addition to this document Urban Practitioners produced the Lea Bridge Planning Framework where they have identified the TW Depot site as being in 'Industrial Use'. These documents clearly highlight that the evidence base which the Core Strategy is based upon are not robust, as they are either factually incorrect or confirm a use type for which an MOL designation would not be considered suitable.

Finally, it is clear from the various policy documents and evidence based documents (e.g. Upper Lea Valley Landscape Strategy, Lea Bridge Road Planning Framework) that, actually, it is the policy objectives that seek the enhancement and change of use of the site, such that it performs the functions of MOL. In other words, the policy designation is an aspiration, rather than an objective assessment of the function and role the site plays today.

The above points have outlined KPLs viewpoint that the TW Depot site portrays none of the characteristics or functions that warrant designation as MOL. However, it is also KPLs viewpoint that the designation of the TW Depot Site as MOL will ensure that the policy objectives that flow from policy CS1 for the Lea Bridge Road Area will not be achieved within the lifetime of the Core Strategy.

CS1 confirms that the majority of proposed growth will be planned to take place within four specific areas in the Borough for which Area Action Plan DPDs will be produced. One of these areas is the Northern Olympic Fringe Area Action Plan (NOFAAP). It is acknowledged in a number of documents (the Core Strategy, the preferred options NOFAAP (which is simultaneously being consulted on), the Lea Bridge Road Planning Framework and the Upper Lea Valley Landscape Strategy) that the TW Depot Site "is key to the regeneration of Lea Bridge, being in a central/ gateway position in the study area" (Lea Bridge Planning Framework, 2009, p76). Therefore the Core Strategy needs to facilitate viable change on this site.

As part of the earlier consultation on the Core Strategy and NOFAAP KPL has specifically highlighted that the entire site is actively used and that there is no operational driver for Thames Water to vacate the site. Indeed, there are large parts of the site where there are significant operational assets. Therefore, for there to be any change in the usage of the site there has to be a clear, commercial, case for the company to examine whether it can reconfigure the usage of this site as part of its property strategy. This will involve enabling development for uses which will generate higher values than the current usage of the site. This will allow parts of the site to be opened up for public and recreational usage, allow TW to finance works elsewhere in order to vacate the site, and ensure the development produces sufficient value to fund environmental enhancement works.

KPL has extensive experience of bringing forward such projects and can confirm that it is not aware of any such uses that are compliant with an MOL policy. It is therefore confident to say that the retention of the MOL designation on the TW Depot Site will ensure that there is not a sound policy basis within the Core Strategy that will enable any change to come forward on the Site through other Development Plan Documents such as the NOFAAP, as it would not be commercially viable.

KPL would stress that where it is feasible TW is actively working in partnership with LBWF and LVRP to permit public access on operational sites and to increase their recreational value. A particularly good example is the Walthamstow Wetlands project. However, even in this project where it does not require the wholesale relocation of uses, there are considerable costs associated with ensuring TW operational assets remain secure and in providing environmental and recreational enhancement to the site. In the case of Walthamstow Wetlands a considerable amount of funding has to be secured before this project can proceed.

In this respect KPL views the TW Depot Site as offering an even wider opportunity than just the on-site improvement that could be facilitated. In its current form the site provides no benefit to the local community in terms of leisure, recreational or amenity. However, as outlined in the enclosed document (The Thames Water Depot Concept Masterplan), if enabling development is permitted, not only will this secure the provision of considerable recreational and community benefits on site, it could also, potentially, support a significant financial planning obligation to help fund the provision of the Walthamstow Wetlands Centre. KPL / TW clearly see these two sites as linked as they are both critical projects required in order to implement the Upper Lea Valley Landscape Strategy. These two sites would significantly improve permeability and access to water frontage and open space. As landowner and active partner on both of these sites, KPL / TW can seek to facilitate this provision.

The proposal for the TW Depot Site, as outlined in the attached masterplan, is only illustrative, but clearly highlights the considerable on-site benefits that could be achieved, together with generating the potential for a significant off-site contribution to the Walthamstow Wetlands Centre. Specific benefits include:

- Enhanced open space and improved access to Metropolitan Open Land and the Lea Valley Regional Park
- The creation of a strong entrance point to the Lea Valley Regional Park
- Creating a focal point to draw people to the LVRP
- Opening up views to the north and south of Lea Bridge Road, up and down the Lea Valley
- Opening up approximately 60 percent of the TW Depot Site as public parks, amenity space, picnic areas, riverside walks, cycle paths etc.

As the masterplan highlights, this proposal for the site has considered the Thames Water operational constraints of the site, it has also been informed by

advisers on transportation, ecology, archaeology, landscape and visual impact and ground conditions. It is therefore deemed to provide a sound framework for a commercially viable, sustainable development proposal that would not compromise TW operations.

Irrespective of the argument as to whether the MOL designation is justified, KPL is firmly of the view that there are very special circumstances that would warrant the de-designation of the site from MOL status, as required under PPG2, due to the significant community benefit that could be achieved by bringing forward an element of commercial development on the site. These are fully outlined in the accompanying masterplan document.

In addition to the community benefits that would otherwise never be achieved, there are other special circumstances that warrant the release of this site from MOL (as highlighted in KPL's earlier representations dated 28 August 2009 in response to the for the Call for Sites). The Waltham Forest Land Availability Assessment highlights that whilst there is the potential capacity for 10,595 dwellings over a 15 year period, there is potential under supply in the first 5 years. The report also highlights that with so much of the Borough's capacity locked up in larger regeneration and housing sites, any delays in these areas coming forward with planning permissions that can be implemented could push the Council's 5 year supply towards a far larger shortfall. This issue appears to be critical given that the predicted supply capacity for phase 2 (years 6-10) are also significantly short of the annual London Plan target.

KPL acknowledge that since the Borough's Land Availability Assessment was completed the GLA has undertaken a Strategic Housing Land Availability Assessment (SHLAA), which has demonstrated additional supply in the Borough. However, whilst additional supply has been identified, there is no explanation as to how the SHLAA sites will help to address the Borough's own assessment that there could be a shortfall in the first 5 to 10 years of the Core Strategy.

This concern is further extended, when considered against the findings of the Borough's Housing Needs and Market Survey. This identifies that the total net affordable housing need is 2,607, which is almost 3.5 times the full annual housing target of 760 units per annum. There is concern regarding the deliverability of affordable housing in that the HLAA found there to be a significant risk that sites will not be economically viable in the weaker housing markets of the Borough, where affordable housing is not supported by grant. Similarly the study states where sites change from industrial to housing there is concern that if the site is relatively small they may not be viable (e.g. less than 1 hectare). This is because the absolute increase in site value may be very small, making it unlikely that such sites would come forward if burdened by additional costs such as site clearance, section 106 etc.

Given the above, KPL has significant concerns regarding the level of housing (but in particular affordable housing) that can be delivered in the early stages of the Core Strategy. This is because of the continuing weak housing market that is generally affecting viability; the on-going austerity measures within the

UK that mean grant funding to support affordable housing will be harder to secure; and the fact that the LBWF are reliant on a number of industrial sites and/or larger, longer term regeneration projects which are more complicated to bring forward and are more likely to have significant abnormal costs associated with them.

It is acknowledged that the Core Strategy needs to be flexible enough to allow for changing circumstances. However, KPL feels that enabling the Thames Water Depot Site to come forward for development would not only secure considerable community and environmental benefit in a key regeneration area, but it would ensure a robust housing delivery strategy. As outlined in the accompanying masterplan document, there are no known constraints to the site coming forward for development and therefore it meets the PPS3 tests for deliverability in this it is available, suitable and achievable.

Part B

Please use a separate sheet for each representation

Name or organisation: _____

For office use only Ref No: csps163 SUPPORT OBJECT OBJECT

3. To which part of the DPD does this representation relate?

Paragraph

Policy

4. Do you consider the Core Strategy DPD is:

(1) Legally Compliant Yes No

(2) Sound Yes No

If you have entered 'no' to 4(2), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is unsound because it is not:

(1) Justified

(2) Effective

(3) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

PLEASE SEE ATTACHED SHEET

(continue on a separate sheet if necessary)

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After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Section 6: CS6 – Enhancing Green Infrastructure and Biodiversity

KPL notes that under policy CS6 it is stated in the explanatory that 'the Council will maintain the strategic extent of the Green Belt and MOL in accordance with national and regional policy'. However, as explained in the representations made in respect of Table A5.2, KPL is of the view that by retaining the MOL designation of TW Depot Site the Core Strategy is unsound.

KPL therefore feels that in order for the Core Strategy to be sound an amendment is required within the supporting text to CS6, which KPL has outlined under section 7 of this form.

Part B

Please use a separate sheet for each representation

Name or organisation:

For office use only
 Ref No: csps164
~~support~~
~~object~~
~~emission~~

3. To which part of the DPD does this representation relate?

Paragraph Policy

4. Do you consider the Core Strategy DPD is:

(1) Legally Compliant Yes No

(2) Sound Yes No

If you have entered 'no' to 4(2), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is unsound because it is not:

(1) Justified

(2) Effective

(3) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

PLEASE SEE ATTACHED SHEET

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After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Section 6: CS2 – Improving Housing Quality and Choice.

KPL supports this overall policy. KPL also acknowledge that the Council has identified sufficient land to meet its overall housing target as defined by the London Plan. However, as identified by the Borough's Land Availability Assessment, KPL does not feel that it has been adequately demonstrated that there are sufficient sites to meet housing and affordable housing demand in the early stages of the Core Strategy.

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

PLEASE SEE ATTACHED SHEET -

(continue on a separate sheet if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

KENNET PROPERTIES LIMITED REPRESENTATIONS RELATE TO A KEY REGENERATION AREA WITHIN THE BOROUGH.

(continue on a separate sheet if necessary)

Please note the inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature: _____

Date: 28/2/2011

If you wish to be informed of the date of the submission of the document to the Secretary of State, please tick this box.

Section 7 – Changes Required

KPL feel that the following changes are required to the Core Strategy in order to make it sound:

Table A5.2 – Proposed Changes to 2006 UDP Proposals Maps

In table A5.2 under Metropolitan Open Land the column for proposed changes should state:

“Thames Water Depot Site, Lea Bridge Road, to be removed from the Metropolitan Open Land designation in order to allow a viable scheme to come forward as part of the Council’s regeneration proposals for the Lea Bridge Road area, which will be further detailed in the Northern Olympic Fringe Area Action Plan.”

These changes are required because:

- 1) The site does not meet any of the functions of Metropolitan Open Land and therefore does not justify such designation.
- 2) The site would help to achieve the short-term housing needs of the Borough.
- 3) The site is situated within one of the key regeneration areas of LBWF whereby change is required if the aims and ambitions for the Lea Bridge Road Area are to be met. The current policy basis will not permit any viable scheme to come forward and therefore ensures that the objectives for Lea Bridge Road (as outlined in a number of evidence documents such as the Lea Bridge Road Planning Framework, the Upper Lea Valley Landscape Strategy) are not deliverable.

Policy CS6, Paragraph 9.4

In order to change the designation in table A5.2, changes are required to the supporting text of policy CS6. KPL recommend the following is added to the end of paragraph 9.4:

“However, it is recognised that within Lea Bridge Road, the Thames Water Depot Site contributes little to the overall objectives that the MOL designation seeks to achieve. In order to bring about wider environmental benefit, and to achieve greater public accessibility and recreational opportunities in this area, the Thames Water Depot Site on Lea Bridge Road has had its designation of MOL removed. This is to allow development to take place, which will enable the ambitions to enhance the environmental quality of this site and wider area viable. The exact extent and form of development will be worked up further as part of the Northern Olympic Fringe Area Action Plan.”

Respondent ID: 186928

2 Representations submitted (IDs: csps148 & csps149)



Development Plan Document (DPD)

Publication Stage Representation Form

Waltham Forest LDF Core Strategy DPD	For office use only
Representations can be made using this form or online:	Reference No: 186928
	Date received: 28/02/2011

<http://walthamforest-consult.limehouse.co.uk/portal>

If using this representation form, please return to the London Borough of Waltham Forest by 5pm on Monday, 28 February 2011

By post: Spatial Planning, Fir Tree House, London Borough of Waltham Forest,
Town Hall Complex, Walthamstow, London E17 4JF

By email: planning.policy@walthamforest.gov.uk

This form has two parts:

Part A – Personal details (only needed once irrespective of how many representations you make)

Part B – Your representation(s). Please complete a separate sheet for **every** representation you wish to make, remembering to insert your name or organisation's name.

Please read the guidance notes before completing this form.

PART A

	1. Personal details*	2. Agent details (if applicable)
Title		MS
First name		EMMA
Last name		BEARDMORE
Job title (where relevant)		
Organisation (where relevant)	TESCO STORES LTD	GL HEARN
Address		
Post Code		
Telephone number		
Email address		

*If an agent is appointed, please enter the person and/or organisation being represented in column 1 and complete all contact details in column 2

Part B

Please use a separate sheet for each representation

Name or organisation:

For office use only
 Ref No: **csps148**
~~subject~~
~~object~~
~~missives~~

3. To which part of the DPD does this representation relate?

Paragraph

Policy

4. Do you consider the Core Strategy DPD is:

(1) Legally Compliant **Yes** **No**

(2) Sound **Yes** **No**

If you have entered 'no' to 4(2), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is unsound because it is not:

(1) Justified

(2) Effective

(3) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

THE MURAL DESIGNATION AS SET OUT IN THE ADOPTED UDP, SHOULD NOT BE CARRIED FORWARD IN THE EMERGING CORE STRATEGY. IT IS NOT APPROPRIATE TO APPLY POLICY CS3 TO THE SITE AS THE SITE IS NOT A STRATEGIC INDUSTRIAL SITE OR BOROUGH EMPLOYMENT AREA. POLICY APPLIED TO THIS SITE SHOULD REFLECT THE PLANNING CONSENT AND THAT THE SITE WILL BE REDEVELOPED FOR RETAIL, RESIDENTIAL, EMPLOYMENT. POLICY SHOULD REFLECT THE APPROVED SCHEME.

(continue on a separate sheet if necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

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7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

IT IS CONSIDERED IN LIGHT OF THE PLANNING CONSENTED SCHEME AND WALTHAM FOREST'S REALLOCATION OF HIGHAMS PARK AS A DISTRICT CENTRE AS A RESULT OF THE RETAIL COMMITMENT TO OMIT POLICY MUR1 FROM THE CORE STRATEGY AND APPLY THE TESTS OF POLICY CS14. ATTRACTIVE AND VIBRANT TOWN CENTRES TO THE SITE WHICH ENCOURAGES AND PROMOTES ALL THOSE USES PROPOSED WITHIN THE DEVELOPMENT SCHEME.

(continue on a separate sheet if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

THE MUR1 SITE IS ONE OF THE SIGNIFICANT DEVELOPMENT SITES WITHIN THE BOROUGH, IT IS IMPORTANT TO RECOGNISE AND MANAGE APPROPRIATELY THROUGH POLICY THE LONG TERM SUSTAINABILITY OF THIS SITE.

(continue on a separate sheet if necessary)

Please note the inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature: _____

Date: 25/02/2011

If you wish to be informed of the date of the submission of the document to the Secretary of State, please tick this box.

Part B

Please use a separate sheet for each representation

Name or organisation:

For office use only
 Ref No: **csps149**
~~support~~
~~object~~
~~decision~~

3. To which part of the DPD does this representation relate?

Paragraph

Policy

4. Do you consider the Core Strategy DPD is:

(1) Legally Compliant **Yes** **No**

(2) Sound **Yes** **No**

If you have entered 'no' to 4(2), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is unsound because it is not:

(1) Justified

(2) Effective

(3) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

THE IDENTIFICATION OF HIGHAMS PARK AS A DISTRICT CENTRE IS SUPPORTED.

(continue on a separate sheet if necessary)

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(continue on a separate sheet if necessary)

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

AS A KEY DEVELOPER WITHIN THE BOROUGH OUR CLIENT WOULD BE KEEN TO BE REPRESENTED AT ANY DEBATE IN CONSIDERATION OF THE PROPOSED RETAIL HIERARCHY OF THE CENTRE.

(continue on a separate sheet if necessary)

Please note the inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date: 25/02/2011

If you wish to be informed of the date of the submission of the document to the Secretary of State, please tick this box.

Respondent ID: 376691

5 Representations submitted (csps150 – csps154)

Development Plan Document (DPD)

Publication Stage Representation Form

Waltham Forest LDF Core Strategy DPD	For office use only
Representations can be made using this form or online:	Reference No: 376691 Date received: 28/02/2011

<http://walthamforest-consult.limehouse.co.uk/portal>

If using this representation form, please return to the London Borough of Waltham Forest by 5pm on Monday, 28 February 2011

By post: Spatial Planning, Fir Tree House, London Borough of Waltham Forest, Town Hall Complex, Walthamstow, London E17 4JF

By email: planning.policy@walthamforest.gov.uk

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Part B – Your representation(s). Please complete a separate sheet for **every** representation you wish to make, remembering to insert your name or organisation's name.

Please read the guidance notes before completing this form.

PART A

	1. Personal details*	2. Agent details (if applicable)
Title		Mr
First name		Charles
Last name		Moran
Job title (where relevant)		
Organisation (where relevant)	City & Provincial Properties Plc	CMA Planning
Address	c/o agent	
Post Code		
Telephone number		
Email address		

*If an agent is appointed, please enter the person and/or organisation being represented in column 1 and complete all contact details in column 2

Part B

Please use a separate sheet for each representation

Name or organisation: CMA Planning

For office use only
Representation ID:
csp150 - csp154

3. To which part of the DPD does this representation relate?

Paragraph **Policy**

See covering letter dated 28th February 2011.

4. Do you consider the Core Strategy DPD is:

(1) Legally Compliant **Yes** **No**

(2) Sound **Yes** **No**

If you have entered 'no' to 4(2), please continue to Q5. In all other circumstances, please go to Q6.

5. Do you consider the DPD is unsound because it is not:

- (1) Justified
- (2) Effective
- (3) Consistent with national policy

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

See covering letter dated 28th February 2011.

(continue on a separate sheet if necessary)

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