

See covering letter dated 28th 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:

(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: *Tim Gaskell*

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.

By Email & Post

Spatial Planning
Environment and Regeneration
Fir Tree House
Waltham Forest Town Hall Complex
Forest Road
Walthamstow
E17 4JF



28th February 2011

Dear Sir / Madam,

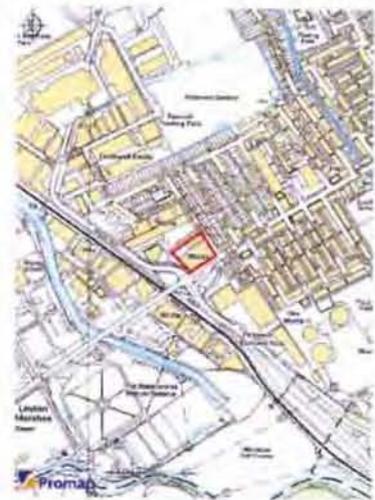
London Borough of Waltham Forest - Local Development Framework
Proposed Submission Core Strategy Consultation - February 2011
Northern Olympic Fringe AAP - Preferred Options - January 2011

We refer to your correspondence dated 17th January 2011 to our client, City & Provincial Properties Plc, seeking comments upon the Council's Core Strategy Proposed Submission document and the Northern Olympic Fringe AAP Preferred Options document.

Our client has a significant land-holding in Waltham Forest, namely a 0.74 hectares site in the south-west of the borough which forms the southern tip of the Eastgate Business Park as illustrated in the site plan opposite.

Our client's site is identified as falling within a wider Strategic Employment Area in the current Waltham Forest UDP and is currently occupied by a range of low-quality industrial and commercial buildings and areas of open yard / storage.

The site occupies a prominent position at the junction of Leabridge Road and Argall Way that marks a key gateway into the borough. However, as illustrated in the photographs below, the site is in generally poor condition, whilst substantial parts of the accommodation have lain vacant for some time presenting a poor first impression of Waltham Forest.





The on-going 'Northern Olympic Fringe Area Action Plan' identifies the potential opportunities afforded by regeneration along Leabridge Road, including: through creating better links to green space; improving connectivity; and benefiting from the regeneration and investment that is currently taking place in the Lower Lea Valley.

To this end we have recently discussed with the Council the potential contribution that the redevelopment of our client's site could make towards delivering a number of the Council's strategic planning and regeneration objectives and submitted a planning application (LBWF Ref 2010/1573), which seeks to bring this forward. Within this context we make the following comments on the Council's recently published documents.

Core Strategy - Proposed Submission

csps150
csps151
Spatial Vision and Strategic Objectives: We support the Council's overarching 'spatial vision' for Waltham Forest and, in particular, the re-opening of Lea Bridge Road Station / Hall Farm Curve and the potential benefits that regeneration schemes can bring to the Borough (paragraphs 2.11 and 3.6).

csps152
As a corollary to this we support the (Northern Olympic Fringe) 'Regeneration Area' as illustrated on the key diagram.

csps153
Policy CS1: We support the overarching approach taken in the Council's draft policies regarding sustainable economic growth, including the need to balance employment land requirements through the appropriate protection and release of currently designated employment land.

We also support focusing regeneration activities in the key growth areas including the Northern Olympic Fringe area, to accommodate growth primarily in housing and jobs.

csps154
(as para. 6.8)
Policy CS3: We note the proposed de-designation of 97 Leabridge Road as a Strategic Employment Location, as shown on Figure 12 and set out at paragraph 6.8 and strongly support this change, agreeing that it would aid regeneration in the Northern Olympic Fringe. We support the set boundaries of Strategic Employment Land being shown in the Core Strategy.

Northern Olympic Fringe AAP - Preferred Options

We support the Council's identified Key Opportunities and, in particular, the re-opening of the Hall Farm Curve could bring to the Borough (paragraph 2.23).

Not for
Core
Strategy
We note that our client's site at 97 Leabridge Road has been identified as a Key Opportunity Site, reference 23. We support this, and designation as "Mixed use / employment / residential / social infrastructure" for the site. We also support the identification of the site as a "Gateway Site" on the draft Proposals Map.

We support the objectives for the Lea Bridge sub area set out at paragraph 4.31, including the activation of Leabridge Road through development, the promotion of the role of the Leabridge neighbourhood centre and the encouragement of the prominence of key landmark sites such as 97 Leabridge Road. We also support the de-designation of 97 Leabridge Road as Strategic Employment Land in line with the



recommendations of the Council's Employment Land Study (2009), as set out at paragraph 4.32. This point is further advanced at paragraph 10.4, which states,

"One exception to the general protection of Strategic Industrial Land is the proposed de-designation of a parcel of land at 97 Lea Bridge Road. The borough's Employment Land Study, found scope for the release of this parcel of land due to its strategic location as a gateway site, the potentially poor access for large service vehicles and the close proximity of residential uses. The Lea Bridge Planning Framework, also promoted the release of this site as a means of developing and improving the quality of the environment and public realm along Lea Bridge Road. The development of residential and office uses is proposed as this would promote activity on the street and provide a user-base for the proposed re-opening of the Lea Bridge Station."

In general we support this, however, we do feel the reference to "residential and office uses" could be limiting. The designation earlier states mixed use / employment / residential / social infrastructure, which would allow for a greater range of uses and assist the site to come forward. We feel the reference to "office" should be changed to "commercial".

We support the designation of the site as being suitable for a portion of housing at paragraph 7.6 and support the mixed use approach set out in paragraph 7.7.

We support the Council's proposal to create a Chingford to Stratford rail link, via the re-opening of Hall Farm Curve as set out at paragraph 12.5. We also support the aim to re-open Leabridge Road Station as set out at paragraph 12.6, due to the potential benefits that would Borough.

The Implementation Framework is set out at section 14, with the statement "the plan is only as beneficial as it is achievable". It seems strange that given this, the only references in this section are to tariffs, the MDC and delivery partners. We feel there is much more to implementation than how section 106 agreements might work. For example, there is no reference in the document to Compulsory Purchase Orders, which could be a key aspect for bringing forward sites.

Another point on this matter is the viability of proposals, and recognizing that in order to deliver schemes and bring forward sites, compromises may need to be made, recognizing that viability is a very real issue. There is a reference in the Glossary to "Dynamic Viability", but this does not seem to relate back to any text within the actual document? Perhaps this approach should be set out in the text under implementation.

We trust the above comments are of assistance and look forward to working with the local planning authority to realize the opportunity afforded by our client's site to contribute towards the Council's planning and regeneration objectives.

We look forward to receiving acknowledgement that these representations have been received along with details of the on-going LDF process.

Yours faithfully,

Charles Moran
CMA Planning

Development Plan Document (DPD)

Publication Stage Representation Form

Waltham Forest LDF Core Strategy DPD	For office use only Reference No: 402769 Date received: 25/2/11
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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	MEHMET	
Last name	BALAMAN	
Job title (where relevant)	-	
Organisation (where relevant)		
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

For office use only

Representation ID:
csps217

Please use a separate sheet for each representation

Name or organisation:

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

Paragraph

6.6-6.9

Policy

CS3A

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.

WE CONSIDER THE DPD UNSOUND ON THE GROUNDS THAT IT HAS NOT TAKEN OUR POSITION INTO CONSIDERATION WE ARE POSITIONED ON THE EDGE OF THE STRATEGIC EMPLOYMENT AREA WHICH HAS MEANT THAT IT WAS ONLY SUITABLE FOR INDUSTRIAL USE. HOWEVER OVER THE YEARS ACCESS TO MY PROPERTY HAS CHANGED, IN THE PAST THERE WAS ACCESS THROUGH ARCAVE WAY BUT NOW IT IS ONLY LIMITED THROUGH BURWELL ROAD, IN ADDITION TO THAT HAVING A RESIDENTIAL ROW OF HOUSES DIRECTLY

(continue on a separate sheet if necessary)

CONT. PLEASE SEE ATTACHED SHEET

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.

opposite us has left us isolated as a viable Business/Employment Entity.

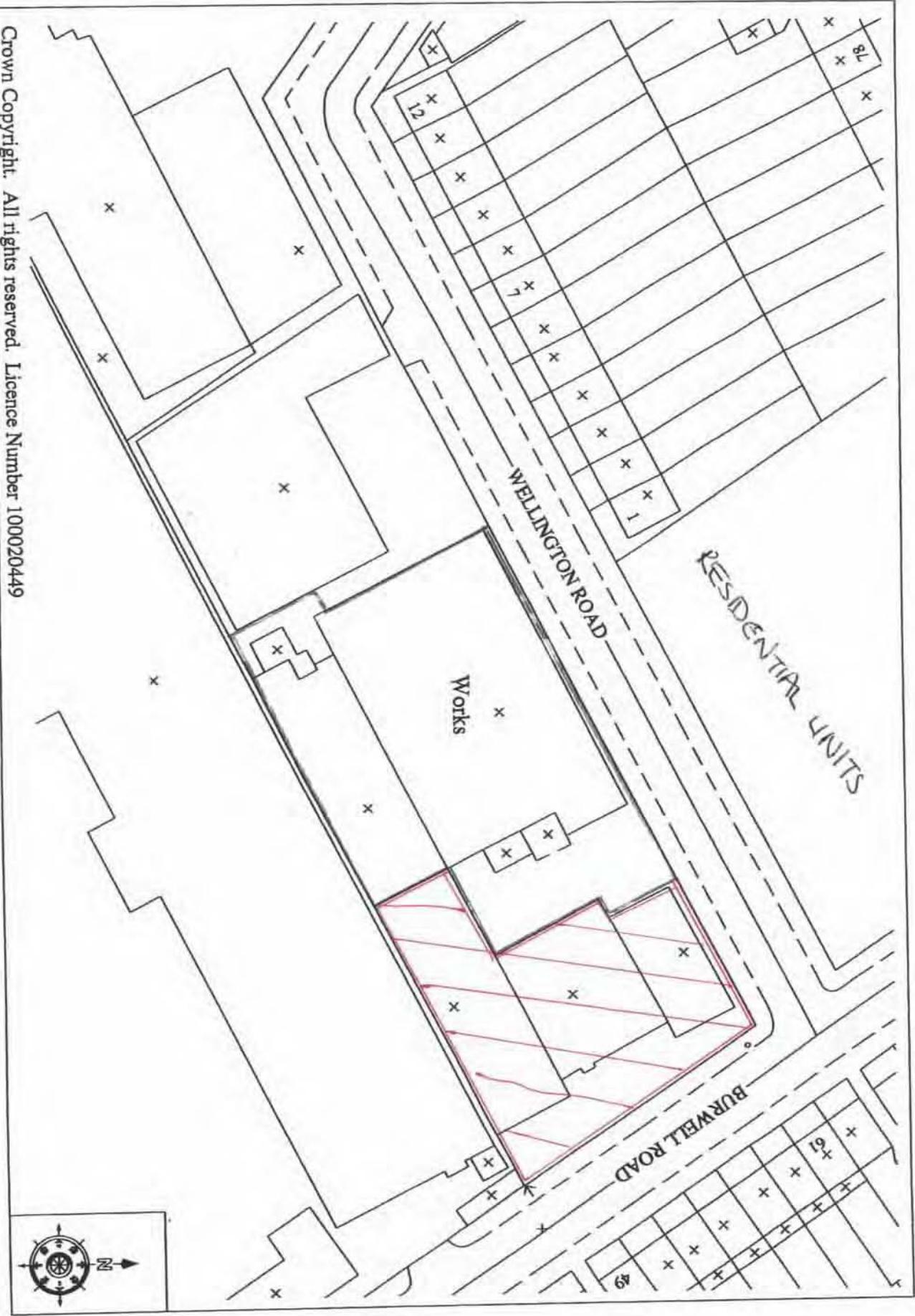
We have been in the building for several years and found it extremely difficult using and utilising it as industrial unit due to several factors which are age, size, height ,layout, unproportionate small size of the yard to the building, limited operating hours due to proximity of the residential buildings as well as major access problems.

We have tried every conceivable way to make the building work. We have tried to renting the whole building with absolutely no success we then decided to split the building up into smaller units but again it proved difficult to rent out. This is despite being on the market for years with the biggest commercial letting Agents in East London. The reason obviously being limited access through residential roads, building height restrictions, limited operating hours due to the close proximity of the residential buildings. I can understand and can sympathise with the constant complaints from our residential neighbours about the noises from the large vehicles trying to gain access. We along with our neighbours at 16 Wellington Road are the only premises in the Strategic Employment Boundary who can only be accessed through Burwell road. I can provide correspondence from agents and complaint letters from neighbours to confirm the issues raised above.

Being in a Strategic Employment section these premises do not serve its purpose , it is limited in it use e.g. storage or warehousing which requires minimum amount of employment.

To Summarise our plot at 14a Burwell Rd along with our neighbours at 16 Wellington Road is incompatible with SIL Designation for several reasons the main points being :-

- . Very Poor access for the type of businesses the building attracts.
- . Very poor access for vehicles due to close proximity of other vehicles and residential buildings
- . Residential complaints And grievances due to impact of industrial use.
- . Non-Marketability , Potential tenants have stated that their lack of interest is mainly down road access, yard access, height restriction, trading hours restrictions and limited parking issues, potential problems with residential neighbours noise pollution.
- . The fact that we along with our neighbours at 16 Wellington Road are the only premises who can only be accessed through Burwell Road makes us isolated and unique from the rest of the estate, quite the opposite in fact a mixed use in designation would allow better usage of plot, more employment opportunities with creative/start up businesses and a more pleasant relationship with residential neighbours.



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16 WELLINGTON ROAD, LONDON E10. (SCALE : 1:1000)

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.

WE WOULD LIKE TO BE DEDESIGNATED AND EXCLUDED FROM SEAS FOR THE REASONS SET OUT IN Q.6. WE BELIEVE A MIXED USE OPTION FOR OUR PREMISES WOULD BE THE MOST SOUND AND EFFECTIVE WAY. OUR PLANS WOULD NOT MEAN LOSING ANY EMPLOYMENT / COMMERCIAL AREA BUT DEVELOPING AND THEREFORE UTILISING IT BETTER ALONGSIDE RESIDENTIAL UNITS. THE RESIDENTIAL / MIXED USE UNITS WOULD BEST SUIT CREATIVE / START UP BUSINESSES WHICH WOULD . . . →

(continue on a separate sheet if necessary)

* CONT. PLEASE SEE ATTACHED

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:

I WOULD LIKE MY VIEWS TAKEN INTO ACCOUNT AND PUT FORWARD MY CASE MORE RIGOROUSLY

(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: 24/02/11

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

Create more employment opportunities, appease our residential neighbours and make more effective use of the plot/building. This would then naturally provide wide ranging benefits to the community.

Although we are just in the SIL area our premises are not suitable for industrial use.

Extending the boundary of De-Designation, as proposed for 97 LEA BRIDGE ROAD, would/should be considered wholly sound or if greater flexibility could be applied such as B.E.A designation, mixed use could come supporting Creative sectors or Education, Health or Social Infrastructure.

Development Plan Document (DPD)

Publication Stage Representation Form

Waltham Forest LDF Core Strategy DPD	For office use only Reference No: 402948 Date received: 25/02/2011
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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

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Please read the guidance notes before completing this form.

PART A

	1. Personal details*	2. Agent details (if applicable)
Title	MR	
First name	FIRAT	
Last name	POSLUOGLU	
Job title (where relevant)		
Organisation (where relevant)		
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: csps216
~~XXXXXX~~
~~XXXXXX~~
~~XXXXXX~~

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

Paragraph

6.6-6.9

Policy

CS3 A

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.

WE CONSIDER THE DPD UNSOUND BECAUSE IT HAS NOT TAKEN OUR POSITION INTO CONSIDERATION. WE ARE POSITIONED ON THE EDGE OF THE STRATEGIC EMPLOYMENT AREA WHICH HAS MEANT THAT IT WAS ONLY SUITABLE FOR INDUSTRIAL USE. HOWEVER OVER THE YEARS ACCESS, WHICH USED TO BE THROUGH WELLINGTON RD TO THE ARGALL IND. ESTATE, HAS BEEN TRANSFERRED TO ARGALL WAY. THIS AS WELL AS THE ^{RESIDENTIAL} DEVELOPMENT OF AN INDUSTRIAL PROPERTY DIRECTLY OPPOSITE US, HAS LEFT US VERY ISOLATED AS A ^A VIABLE BUSINESS/EMPLOYMENT ENTITY. WE HAVE BEEN IN THE PREMISES FOR SEVERAL YEARS AND THE CHANGES SET OUT ABOVE AS WELL AS THE

(continue on a separate sheet if necessary)

(CONT ON DIFF. PAPER →)

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.

Q6) AGE, SIZE, HEIGHT, LAYOUT, SMALL YARD FOR SIZE OF BUILDING, ACCESS ISSUES, LIMITED OPERATING HOURS OF THE BUILDING, HAVE PRESENTED PROBLEMS FOR US IN TERMS OF USING & UTILISING IT AS AN INDUSTRIAL UNIT.

WE HAVE TRIED EVERY WAY IMAGINABLE TO MAKE THE BUILDING WORK IN ITS CURRENT STATE SUCH AS TRYING TO LET AS A WHOLE UNIT - IT WAS ON THE MARKET FOR NEARLY 4 YEARS WITH NO SUCCESS. ACCESS LIMITATIONS FOR LARGE VEHICLES THROUGH NARROW RESIDENTIAL ROADS AS WELL AS BUILDING HEIGHT RESTRICTIONS WERE THE MAIN REASONS GIVEN. WE THEN DECIDED TO SPLIT INTO SMALLER UNITS TO ATTRACT SMALLER BUSINESSES BUT THIS HAS ALSO PROVED VERY DIFFICULT. ACCESS PROBLEMS KEEP COMING UP FOR REASONS OF NO INTEREST; OPERATING HOURS ALSO LIMITS POTENTIAL TENANTS. WE ARE SURROUNDED BY RESIDENTIAL PROPERTY WHO CONTINUALLY COMPLAIN ABOUT NOISE AND LARGE VEHICLES TRYING TO GAIN ACCESS. US ALONG WITH OUR NEIGHBOUR (14A BURWELL ROAD) ARE THE ONLY PREMISES THAT ARE ACCESSED VIA BURWELL/WELLINGTON ROAD WHICH IS IN THE STRATEGIC EMPLOYMENT BOUNDARY. WE SEEM TO BE A SMALL FORGOTTEN POCKET OF LAND WHICH IS STRUGGLING TO FUNCTION UNDER THE PRESENT CONDITIONS.

WE CAN EVIDENCE OUR ENDEAVOURS OF MARKETING THE UNIT FIRST AS A WHOLE THEN ^{AS} SMALLER UNITS. WE CAN ALSO ^{PROVIDE} EVIDENCE OF RESIDENTIAL COMPLAINTS.

IRONICALLY FOR A PIECE OF LAND THAT IS IN A STRATEGIC EMPLOYMENT SECTION IT DOES NOT EMPLOY OR GENERATE MUCH EMPLOYMENT. A FEW OF OUR UNITS WHICH ARE ON SHORT TERM LETS EMPLOY SOMEONE FROM OUTSIDE THE BOROUGH JUST TO FERRY STOCK BACK AND FORTH.

(2)

TO SUMMARISE OUR PLOT ALONG WITH OUR NEIGHBOUR (14A BURWELL RD) IS INCOMPATIBLE WITH SIL DESIGNATION FOR SEVERAL REASONS:

- VERY POOR ACCESS FOR THE TYPE OF BUSINESSES THE BUILDING ATTRACTS.
- VERY POOR ACCESS FOR VEHICLES DUE TO PROXIMITY OF OTHER VEHICLES AND RESIDENTIAL PROPERTIES.
- RESIDENTIAL COMPLAINTS & GRIEVANCES DUE TO IMPACT OF INDUSTRIAL USE.
- NON-MARKETABLE - POTENTIAL TENANTS HAVE PUT FORWARD ACCESS ISSUES IN TERMS OF ROAD ACCESS AND YARD ACCESS, HEIGHT RESTRICTIONS, TRADING HOURS RESTRICTIONS AS MAIN REASONS FOR LACK OF INTEREST.
- THE FACT THAT WE ARE THE ONLY PREMISES ON WELLINGTON ROAD ACCESSED VIA BURWELL RD MAKES US ISOLATED AND SEPERATE FROM THE MAIN INDUSTRIAL ESTATE. WE DO NOT FEEL A PART OF THE ESTATE, QUITE THE OPPOSITE ^{IN FACT} - A MIXED USE DESIGNATION WOULD ALLOW BETTER USAGE OF PLOT, MORE EMPLOYMENT OPPORTUNITIES WITH CREATIVE / START UP BUSINESSES AND A MORE PLEASANT RELATIONSHIP WITH RESIDENTIAL NEIGHBOURS.
- LIMITED PARKING ISSUES FOR POTENTIAL TENANTS IS ALSO A COMMON COMPLAINT.



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16 WELLINGTON ROAD, LONDON E10. (SCALE : 1:1000)

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.

WE WOULD LIKE TO BE DEDESIGNATED AND EXCLUDED FROM SEAS FOR THE REASONS SET OUT IN Q.6. WE BELIEVE A MIXED USE OPTION FOR OUR PREMISES WOULD BE THE MOST SOUND & EFFECTIVE. OUR PLANS WOULD NOT MEAN LOSING ANY EMPLOYMENT/COMMERCIAL AREA BUT DEVELOPING AND THEREFORE UTILISING IT ^{BETTER} ALONGSIDE RESIDENTIAL UNITS. THE RESIDENTIAL/MIXED USE UNITS WOULD BEST SUIT CREATIVE/STARTUP BUSINESSES WHICH WOULD...

(continue on a separate sheet if necessary)

CONT. →

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:

I WOULD LIKE TO HAVE MY VIEWS TAKEN INTO ACCOUNT AND PUT FORWARD MY CASE MORE RIGOROUSLY.

(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: 23/02/2011

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

16 WELINGTON ROAD E10
7QF
MR. F. POSLUDGW

Q7)

... CREATE MORE EMPLOYMENT OPPORTUNITIES, APPEASE OUR RESIDENTIAL NEIGHBOURS & GENERALLY MAKE MORE EFFECTIVE USE OF THE PLOT/BUILDING. THIS WOULD THEN NATURALLY PROVIDE WIDE RANGING BENEFITS TO THE COMMUNITY. ALTHOUGH WE ARE JUST IN THE SIL AREA OUR PREMISES ARE NOT SUITABLE FOR INDUSTRIAL USE. EXTENDING THE BOUNDARY OF DE-DESIGNATION, AS PROPOSED FOR 97 LEA BRIDGE ROAD, TO INCLUDE US WOULD/SHOULD BE CONSIDERED WHOLLY SOUND, OR IF GREATER FLEXIBILITY COULD BE APPLIED, SUCH AS B.E.A DESIGNATION, MIXED USE COULD COME FORWARD SUPPORTING CREATIVE SECTORS OR EDUCATION, HEALTH OR SOCIAL INFRASTRUCTURE.

Figure 12 Lea Bridge Gateway Strategic Industrial Location



Respondent ID: 403791

7 Representations submitted (csps35 to csps41)

Comment on	Core Strategy Proposed Submission
Respondent ID	403791
Respondent	Rapleys
Contact Person	Anthony Pharoah, Senior Planner
Representation ID	csps35
Response Date	24/02/2011
Submission Type	Web
Consultation Point	Chapter 04 - Policy CS1- Location and Management of Growth
Legal Compliance	No
Soundness	No
Unsound because it is not	(1) Justified; (3) Consistent with national policy
Reasons for compliance and soundness	<p>Criterion E (i) states that the “integrity” of the Green Belt and Metropolitan Open Land should be preserved. Integrity does not define what the Council is trying to achieve, and it is not consistent with the aims of PPG2. It is considered that this is both ambiguous - therefore not effective - and not in accordance with national policy. Whilst we agree with the general theme of protecting Open Space, Green Belt and Metropolitan Open Land in the borough, there should be clear justification for its retention, if the land is being promoted for an alternative use. In preparing the Core Strategy, the Council should refer to the guidance in PPG2, PPS7, and PPG17, which sets out the purpose of land being retained as open land, recreational space and/or included in the Green Belt. If it does not meet any of the criteria for being retained as Green Belt, an alternative use should be welcomed. As you will be aware, we are currently promoting the Kingfisher Sports Ground on behalf of Blackhorse Ventures. As set out in our previous representations to the Core Strategy Preferred Option, and the Site Allocations DPD, we consider that it should be removed from the Green Belt (and therefore retained open land) as it does not meet the purposes for being in the Green Belt. We agree with the general principles set out in Criterion E (iii) and (iv).</p>

**Changes
necessary for
legal compliance
and soundness**

It is recommended that criterion E (i) be changed to read:
“Protecting the borough’s Green Belt and Metropolitan Open
Land in accordance with PPG2 unless very special
circumstances can be demonstrated “ We also recommend that
the Kingfisher Sports Ground be removed from the Green Belt
and allocated as an extension to the Waltham Park Way BEA

Oral Examination NO

**Reasons for oral
examination** N/A

Attachment Nil

Comment on Core Strategy Proposed Submission

Respondent ID 403791

Respondent Rapleys

Contact Person Anthony Pharoah, Senior Planner

Representation ID csps36

Response Date 24/02/2011

Submission Type Web

Consultation Point Chapter 04 - Paragraph 4.34

Legal Compliance No

Soundness No

Unsound because it is not (1) Justified; (2) Effective; (3) Consistent with national policy

Reasons for compliance and soundness

Whilst we agree with the general theme of protecting Open Space, Green Belt and Metropolitan Open Land in the borough, there should be clear justification for its retention, if the land is being promoted for an alternative use. The site would clearly be more appropriately used for employment land. In preparing the Core Strategy, the Council should refer to the guidance in PPG2, PPS7, and PPG17, which sets out the purpose of land being retained as open land, recreational space and/or included in the Green Belt. If it does not meet any of the criteria for being retained as Green Belt, an alternative use should be welcomed. Green Belt As you will be aware, we are currently promoting the Kingfisher Sports Ground on behalf of Blackhorse Ventures. As set out in our representations to the Site Allocations DPD, we consider that it should be removed from the Green Belt (and therefore retained open land) as it does not meet the purposes for being in the Green Belt. We base this view on the five criteria as set out in Paragraph 1.5 of PPG2. In detail, we consider that the site does not meet any of the criteria, and as such, should be allocated as employment land. To check unrestricted sprawl of large built up areas The site is located next to a major road and employment site and has limited ability to prevent the sprawl of built up areas, as it is bounded by the A406. This road acts as a barrier to any sprawl and prevents any further encroachment on the Green Belt. To prevent neighbouring towns from merging into another The neighbouring 'town' - or in this case, area of development to the north - is separated by Banbury Reservoir, which in itself is a significant physical feature and would prevent any merging of built up areas. To assist in safeguarding the countryside from encroachment The site is currently surrounded by built form, with the A406 being to the east, warehousing immediately

adjacent to the southern boundary and a driving range and associated developments to the north. The site is in a predominantly urban area, and does not give any feel of being part of the 'countryside'. In this respect, the land offers no safeguarding of the countryside from encroachment. Accordingly, it does not assist in meeting this purpose of the Green Belt. To preserve the setting and special character of historic towns The site, and this part of the Green Belt, does not offer any protection or preservation to the setting and special character of the urban area. Indeed, the development of the site will give the opportunity to design an employment scheme that has more sympathetic relationship with the Green Belt (i.e. that incorporates landscaping, etc) therefore improving the setting of the town. To assist urban regeneration, by encouraging the recycling of derelict and other urban land It is the intention that this site can provide an excellently accessible location for a modern business space for small to medium sized enterprises, therefore meeting the wider regeneration objectives for the area. Open Land The site has not been used for playing fields for the past 10 years. Given that the Council does not recognise it as a strategic outdoor leisure facility in the Blackhorse Lane Interim Policy Framework (para 7.4), and that there appears to be an adequate current supply in the area such as the Wadham Lodge, Hale End sports Grounds and the park to the south of Billet Road. PPG17 indicates that land can be developed were it is surplus to requirements (Paragraph 10). It is therefore, logical to assume that the site is not central to the Council Playing Field provision or its future strategy for open space. Additionally, the site does not contribute to landscape character of the area, and is considered not to contribute to the Borough's supply of Open Land. Designation as Employment Land The site is on the edge of an area of warehousing and represents a logical extension of the neighbouring employment use. The development and 'clustering' of a new employment location near to and existing Borough Employment Area (BEA). The development of this site would provide a new 'state of the art' employment opportunity for industrial, warehousing, and SMEs. The development of the site represents an invaluable opportunity to create a specific, purpose built piece of employment land that is not fettered by the constraints and demands of out-dated and redundant employment industries. The site also benefits from being located near to an excellent access to the strategic road network. The allocation of the Kingfisher Sports Ground would therefore conform with the proposed employment policies (and wider Council objectives for the Borough) as set out in the draft Core Strategy.

The text should be altered to include all aims of Green Belt as set out in PPG2, and the site should be included within the boundaries of Waltham Park Way BEA.

Changes necessary for legal compliance and soundness

Oral Examination Not specified

Reasons for oral examination	N/A
Attachment	Nil

Comment on Core Strategy Proposed Submission

Respondent ID 403791

Respondent Rapleys

Contact Person Anthony Pharoah, Senior Planner

Representation ID csps37

Response Date 24/02/2011

Submission Type Web

Consultation Point Chapter 04 - Paragraph 4.35

Legal Compliance No

Soundness No

Unsound because it is not (1) Justified; (2) Effective; (3) Consistent with national policy

Reasons for compliance and soundness

Whilst we agree with the general theme of protecting Open Space, Green Belt and Metropolitan Open Land in the borough, there should be clear justification for its retention, if the land is being promoted for an alternative use. The site would clearly be more appropriately used for employment land. In preparing the Core Strategy, the Council should refer to the guidance in PPG2, PPS7, and PPG17, which sets out the purpose of land being retained as open land, recreational space and/or included in the Green Belt. If it does not meet any of the criteria for being retained as Green Belt, an alternative use should be welcomed. Green Belt As you will be aware, we are currently promoting the Kingfisher Sports Ground on behalf of Blackhorse Ventures. As set out in our representations to the Site Allocations DPD, we consider that it should be removed from the Green Belt (and therefore retained open land) as it does not meet the purposes for being in the Green Belt. We base this view on the five criteria as set out in Paragraph 1.5 of PPG2. In detail, we consider that the site does not meet any of the criteria, and as such, should be allocated as employment land. To check unrestricted sprawl of large built up areas The site is located next to a major road and employment site and has limited ability to prevent the sprawl of built up areas, as it is bounded by the A406. This road acts as a barrier to any sprawl and prevents any further encroachment on the Green Belt. To prevent neighbouring towns from merging into another The neighbouring 'town' - or in this case, area of development to the north - is separated by Banbury Reservoir, which in itself is a significant physical feature and would prevent any merging of built up areas. To assist in safeguarding the countryside from encroachment The site is currently surrounded by built form, with the A406 being to the east, warehousing immediately

adjacent to the southern boundary and a driving range and associated developments to the north. The site is in a predominantly urban area, and does not give any feel of being part of the 'countryside'. In this respect, the land offers no safeguarding of the countryside from encroachment. Accordingly, it does not assist in meeting this purpose of the Green Belt. To preserve the setting and special character of historic towns The site, and this part of the Green Belt, does not offer any protection or preservation to the setting and special character of the urban area. Indeed, the development of the site will give the opportunity to design an employment scheme that has more sympathetic relationship with the Green Belt (i.e. that incorporates landscaping, etc) therefore improving the setting of the town. To assist urban regeneration, by encouraging the recycling of derelict and other urban land It is the intention that this site can provide an excellently accessible location for a modern business space for small to medium sized enterprises, therefore meeting the wider regeneration objectives for the area. Open Land The site has not been used for playing fields for the past 10 years. Given that the Council does not recognise it as a strategic outdoor leisure facility in the Blackhorse Lane Interim Policy Framework (para 7.4), and that there appears to be an adequate current supply in the area such as the Wadham Lodge, Hale End sports Grounds and the park to the south of Billet Road. PPG17 indicates that land can be developed were it is surplus to requirements (Paragraph 10). It is therefore, logical to assume that the site is not central to the Council Playing Field provision or its future strategy for open space. Additionally, the site does not contribute to landscape character of the area, and is considered not to contribute to the Borough's supply of Open Land. Designation as Employment Land The site is on the edge of an area of warehousing and represents a logical extension of the neighbouring employment use. The development and 'clustering' of a new employment location near to and existing Borough Employment Area (BEA). The development of this site would provide a new 'state of the art' employment opportunity for industrial, warehousing, and SMEs. The development of the site represents an invaluable opportunity to create a specific, purpose built piece of employment land that is not fettered by the constraints and demands of out-dated and redundant employment industries. The site also benefits from being located near to an excellent access to the strategic road network. The allocation of the Kingfisher Sports Ground would therefore conform with the proposed employment policies (and wider Council objectives for the Borough) as set out in the draft Core Strategy.

The text should be altered to include all aims of Green Belt as set out in PPG2, and the site should be included within the boundaries of Waltham Park Way BEA.

Changes necessary for legal compliance and soundness

Oral Examination NO

Reasons for oral examination	N/A
Attachment	Nil

Comment on Core Strategy Proposed Submission

Respondent ID	403791
Respondent	Rapleys
Contact Person	Anthony Pharoah, Senior Planner
Representation ID	csps38
Response Date	24/02/2011
Submission Type	Web
Consultation Point	Chapter 06 - Policy CS3 - Making Efficient Use of Employment Land
Legal Compliance	No
Soundness	No
Unsound because it is not	(1) Justified; (2) Effective
Reasons for compliance and soundness	<p>Criterion A We agree with the Council's approach to promote, manage, and, where appropriate, protect Strategic Industrial Locations. We would suggest that decisions relating to this should be based on robust evidence, supported by an Employment Land Study refresh. We agree with the flexible approach being suggested by the Council to allow realistic management of employment land, which is no longer viable and surplus to requirements, to be released for more productive uses. However, we would note that sufficient employment land should be allocated for the Borough in totality, in order to compensate for the loss of inappropriate and redundant employment land, and provide job opportunities in more appropriate locations. Accordingly, we would suggest that consideration should be given to sites not currently allocated, but can meet the Borough's requirement for new employment space. As a consequence, consideration should be given to removing the Kingfishers Sports Ground from the Green Belt and inclusion as a Borough Employment Area. Criterion B We strongly support the policy to intensify and upgrade existing employment land in the Borough Employment Areas (BEA). We also welcome the designation of Waltham Park Way as one such BEA. We strongly encourage the provision of new employment spaces suitable for small and medium sized enterprises. We encourage the Council to provide appropriate facilities, in accessible locations which serve the needs of the business, and have good access to the strategic road network. Therefore, consideration should be given to Kingfisher Sports Ground being a new extension of this employment designation. Kingfisher Sports Ground represents a site that is unconstrained by previous outdated locations, layouts, and facilities, and will enable a better relationship with the Green</p>

Belt boundary than existing.

**Changes
necessary for
legal compliance
and soundness**

We suggest consideration is given to the removal of the Kingfishers Sports Ground from the Green Belt and allocated for employment use, as part of the neighbouring BEA

Oral Examination

Not specified

**Reasons for oral
examination**

N/A

Attachment

Nil

Comment on Core Strategy Proposed Submission

Respondent ID 403791

Respondent Rapleys

Contact Person Anthony Pharoah, Senior Planner

Representation ID csps39

Response Date 24/02/2011

Submission Type Web

Consultation Point Chapter 09 - Policy CS6 - Protection and Enhancement of the Natural Environment

Legal Compliance No

Soundness No

Unsound because it is not (1) Justified; (2) Effective; (3) Consistent with national policy

Reasons for compliance and soundness

We generally agree with the Council's stance in endeavouring to protect and enhance green infrastructure through protecting Green Belt and Metropolitan Open Land (MOL) where appropriate. When considering proposals that are not on brownfield land and buildings, the Council should refer to the guidance in PPG2, PPS7, and PPG17, which sets out the purpose of land being retained as open land, recreational space and/or included in the Green Belt. If it does not meet any of the criteria for being retained as Green Belt, an alternative use should be welcomed. As you will be aware, we are currently promoting the Kingfisher Sports Ground on behalf of Blackhorse Ventures. As set out in our representations to the Site Allocations DPD, we consider that it should be removed from the Green Belt (and therefore retained open land) as it does not meet the purposes for being in the Green Belt. We base this view on the five criteria as set out in Paragraph 1.5 of PPG2. In detail, we consider that the site does not meet any of the criteria, and as such, should be allocated as employment land. To check unrestricted sprawl of large built up areas The site is located next to a major road and employment site and has limited ability to prevent the sprawl of built up areas, as it is bounded by the A406. This road acts as a barrier to any sprawl and prevents any further encroachment on the Green Belt. To prevent neighbouring towns from merging into another The neighbouring 'town' - or in this case, area of development to the north - is separated by Banbury Reservoir, which in itself is a significant physical feature and would prevent any merging of built up areas. To assist in safeguarding the countryside from encroachment The site is currently surrounded by built form, with the A406 being to the east, warehousing immediately adjacent to the southern boundary and a driving range and

associated developments to the north. The site is in a predominantly urban area, and does not give any feel of being part of the 'countryside'. In this respect, the land offers no safeguarding of the countryside from encroachment. Accordingly, it does not assist in meeting this purpose of the Green Belt. To preserve the setting and special character of historic towns The site, and this part of the Green Belt, does not offer any protection or preservation to the setting and special character of the urban area. Indeed, the development of the site will give the opportunity to design an employment scheme that has more sympathetic relationship with the Green Belt (i.e. that incorporates landscaping, etc) therefore improving the setting of the town. To assist urban regeneration, by encouraging the recycling of derelict and other urban land It is the intention that this site can provide an excellently accessible location for a modern business space for small to medium sized enterprises, therefore meeting the wider regeneration objectives for the area. Additionally, the site has not been used for playing fields for the past 10 years. Given that the Council does not recognise it as a strategic outdoor leisure facility in the Blackhorse Lane Interim Policy Framework (para 7.4), and that there appears to be an adequate current supply in the area such as the Wadham Lodge, Hale End sports Grounds and the park to the south of Billet Road. PPG17 indicates that land can be developed were it is surplus to requirements (Paragraph 10). It is therefore, logical to assume that the site is not central to the Council Playing Field provision or its future strategy for open space. The site is on the edge of an area of warehousing and represents a logical extension of the neighbouring employment use. The development of this site would provide a new 'state of the art' employment opportunity for industrial, warehousing, and SMEs. This is because they need excellent access to the strategic road network. The allocation of the Kingfisher Sports Ground would therefore conform with the proposed employment policies (and wider Council objectives for the Borough) as set out in the draft Core Strategy.

Changes necessary for legal compliance and soundness

We recommend that the Kingfisher Sports Ground be removed from the Green Belt and allocated as an extension to the Waltham Park Way BEA.

Oral Examination

Not specified

Reasons for oral examination

N/A

Attachment

Nil

Comment on Core Strategy Proposed Submission

Respondent ID 403791

Respondent Rapleys

Contact Person Anthony Pharoah, Senior Planner

Representation ID csps40

Response Date 24/02/2011

Submission Type Web

Consultation Point Chapter 09 - Paragraph 9.5

Legal Compliance No

Soundness No

Unsound because it is not (1) Justified; (2) Effective; (3) Consistent with national policy

Reasons for compliance and soundness

In order for the Core Strategy and other Development Plan Documents to be declared 'sound' they must be assessed on a robust evidence base. We raise concerns regarding the evidence base, and that by the time of examination it is likely to be around 3 years out of date. It is also likely research and of this study was undertaken much in advance of the publication date - indicating it is likely to be further out of date. In this respect, there have been a number of changes in wider circumstances that should be, such as a stabilisation of the economy, and early emergence from recession, indicating demand for employment land may be negatively skewed. The Coalition Government has replaced the previous long-standing Labour Government, and has started to implement a shift away from centralist thought towards a focus on localism. The site at Kingfishers Sports Ground still remains vacant and has not been actively used for sports purposes. The landscape character has not improved significantly, and does not benefit its designation in the Green Belt. We believe it is appropriate to remove this site from the Green Belt, as set out in representations to the Core Strategy and the Site Allocations DPD in addition to those reasons set out in representations to this document in accordance with guidance in PPG2. The site is located next to a major road and employment site and has limited ability to prevent the sprawl of built up areas, or prevent neighbouring towns from merging. The sites location surrounded by built form, with the A406 being to the east, warehousing immediately adjacent to the southern boundary gives it a predominantly urban free. We do however welcome provision for flexibility which should be based on guidance in PPG2, PPS7, and PPG17, which sets out the purpose of land being retained as open land, recreational space and/or included

in the Green Belt, and indicates that very special circumstances may justify inappropriate development. If it does not meet any of the criteria for being retained as Green Belt, an alternative use should be welcomed. The site does not offer any protection or preservation to the setting and special character of the urban area. It is the intention that this site can provide an excellently accessible location for a modern business space for small to medium sized enterprises, therefore meeting the wider regeneration objectives for the area.

Changes necessary for legal compliance and soundness

The evidence base used by the Council should be 'refreshed' in order to provide the most robust basis for forming policy and recognising that there should be sufficient employment land in the borough in totality, and that the Kingfisher Sports Ground site should be removed from the Green Belt and included as an extension to the adjacent BEA.

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

Comment on Core Strategy Proposed Submission

Respondent ID	403791
Respondent	Rapleys
Contact Person	Anthony Pharoah, Senior Planner
Representation ID	csps41
Response Date	24/02/2011
Submission Type	Web
Consultation Point	Chapter 03 - Paragraph 3.13
Legal Compliance	Yes
Soundness	Yes
Unsound because it is not	N/A
Reasons for compliance and soundness	<p>Strategic Objective 1 We agree with the Council's objective to capitalise on redevelopment opportunities to secure physical, economic and environmental regeneration of the borough and ensure the delivery of key benefits for local people. Strategic Objective 3 - Making Efficient Use of Employment Land” We agree with the Council’s approach to facilitating sustainable economic growth by safeguarding and enhancing an appropriate range of sites and premises to meet the demand of local businesses. We welcome the designation of Waltham Park Way as a ‘Borough Employment Area’ and suggest that it would be appropriate to enhance and improve this employment area through extension of the boundary to include the Kingfisher Sports Ground as it is close to residential areas (and sites allocated for future residential development) highly accessible and would allow for the development of high state of the art business park for SMEs.</p>
Changes necessary for legal compliance and soundness	N/A
Oral Examination	NO
Reasons for oral examination	N/A
Attachment	Nil

Respondent ID: 404194

7 Representations submitted (csps72, csps75 & csps252 - csps256)

Development Plan Document (DPD)



Publication Stage Representation Form

Waltham Forest LDF Core Strategy DPD

For office use only

Reference No: 404194

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		MISS
First name		ANNIE
Last name		PANG
Job title (where relevant)		
Organisation (where relevant)		ADRIAN SALT AND PANG LTD ON BEHALF OF UK POWER NETWORKS (OPERATIONS) LTD
Address		
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: **csp572**
~~SUPP~~
~~DPD~~
~~CONS~~

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.

Policy CS1 A) The concept of focusing regeneration in key growth areas is supported but the delineation of the boundary of the Northern Olympic Fringe should be extended to include further areas with similar characteristics with reference to social infrastructure and areas with similar reported incidences of anti-social behaviour.

(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.

Policy CS1 A The definition of key growth areas should be provided. The delineation of the boundary of the Northern Olympic Fringe should be extended to include further areas with similar characteristics with reference to social infrastructure and areas with similar reported incidences of anti-social behaviour. Policy CS1 E) Accommodating growth on previously developed land is supported but the Core Strategy should also address the issue of blight. Suggested additional inclusion to Policy CS1: To minimise blight, the Council should make every effort to bring surplus land that is currently safeguarded for infrastructural improvements back into productive use by seeking clarification with the authority-in-charge on the amount of land that is required or can be released. A prime example of this is land that is currently safeguarded for Crossrail 2 Extension.

(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:

TO ENSURE FAIR REPRESENTATION

(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: ADRIAN SALT AND PANG LTD

Date: 28 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.

Ref. No. csps75

Event Name	Core Strategy Proposed Submission
Comment by	UK Power Networks (Operations) Ltd ()
Comment ID	csps75
Response Date	28/02/11 17:00
Consultation Point	4.7 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.8
Agent	ADRAIN SALT AND PANG

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

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? No

Unsound

Do you consider the DPD is unsound because it is not: (1) Justified
 (2) Effective

Reasons for compliance and soundness

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.

As comments for Para. 4.6 above.

Participation at oral part of examination

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

Reasons for participation at oral part of examination

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

For fair representation.

Part B

Please use a separate sheet for each representation

Name or organisation:

For office use only
 Ref No: **csps252**
~~support~~
~~object~~
~~mission~~

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

Paragraph

4.6

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.

(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.

With reference to comments on Policy CS1 A and E above;
 Policy CS1 A The definition of key growth areas should be provided. The delineation of the boundary of the Northern Olympic Fringe should be extended to include further areas with similar characteristics with reference to social infrastructure and areas with similar reported incidences of anti-social behaviour.
 Policy CS1 E) Accommodating growth on previously developed land is supported but the Core Strategy should also address the issue of blight. Suggested additional inclusion to Policy CS1: To minimise blight, the Council should make every effort to bring surplus land that is currently safeguarded for infrastructural improvements back into productive use by seeking clarification with the authority-in-charge on the amount of land that is required or can be released. A prime example of this is land that is is currently safeguarded for Crossrail 2 Extension. (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:

TO ENSURE FAIR REPRESENTATION

(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: ADRIAN SALT AND PANG LTD

Date: 28 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.

Comment by Adrian Salt and Pang Limited on behalf of UP Power Networks (Operations) Ltd (Miss Annie Pang)

Comment ID **csps253**

Response Date 28/02/11 14:56

Consultation Point 4.14 Paragraph (

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

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? No

Unsound

Do you consider the DPD is unsound because it is not: (2) Effective

Reasons for compliance and soundness

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.

Para 4.14 The delineation of the southern part of the North Olympic Fringe Action Area appears to be arbitrary, designed only to coincide with the northern part of the Olympic Park and does not necessarily reflect the needs of this part of the borough. The NOFA should be extended eastwards to include further opportunity sites, thus increasing the amount of potential new homes.

Changes necessary for legal compliance and soundness

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 in the question above (Justified/ Effective/ Consistent with National Policy) 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.

Para 4.14 The delineation of the southern part of the North Olympic Fringe Action Area should be extended to include further opportunity sites, thus increasing the amount of potential new homes. An example is the Cathall Road Substation Site which can provide approximately 90 new residential units in an area with similar socio-economic characteristics in the Cathall Ward (see Fig. 1 Proposed Extension NOF AAP by email)

Participation at oral part of examination

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

Reasons for participation at oral part of examination

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

For fair representation

EDF Energy Site, Cathall Road, E11

AS
AP



FIG. L1:
Location Plan

Adrian Cook and Philip Lunt
Development Planning Consultants
124 Ludlow Road - London W8 1SD, UK
Tel: 02032920071 Fax: 02032920076
www.dpcplanning.com
www.philippluntplanning.com

Comment by Adrian Salt and Pang Limited on behalf of UP Power Networks (Operations) Ltd (Miss Annie Pang)

Comment ID csps254

Response Date 28/02/11 15:03

Consultation Point 4.17 Paragraph _____

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

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? No

Unsound

Do you consider the DPD is unsound because it is not: (1) Justified
 (2) Effective

Reasons for compliance and soundness

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 delineation of the southern boundary of the North Olympic Fringe Action Area appears to be arbitrary.

Changes necessary for legal compliance and soundness

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 in the question above (Justified/ Effective/ Consistent with National Policy) 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.

Para.4.17 Add to "Other key Sites": No.442 Cathall Road (previously identified as a housing site by the Council), with the potential to deliver approximately 90 new residential units within an extended NOFA area.

Participation at oral part of examination

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

Reasons for participation at oral part of examination

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

For fairness of representation

Comment by Adrian Salt and Pang Limited on behalf of UP Power Networks (Operations) Ltd (Miss Annie Pang)

Comment ID **csps255**

Response Date 28/02/11 16:08

Consultation Point 5.5 Paragraph (

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

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? No

Unsound

Do you consider the DPD is unsound because it is not: (2) Effective

Changes necessary for legal compliance and soundness

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 in the question above (Justified/ Effective/ Consistent with National Policy) 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.

The Northern Olympic Fringe, if extended eastwards will increase the level of housing provision in the medium to long term. Therefore, the NOFAA boundary should be adjusted (see comments on CS1 A, CS1 E and para 4.14 above).

Comment by Adrian Salt and Pang Limited on behalf of UP Power Networks (Operations) Ltd (Miss Annie Pang)

Comment ID csps256

Response Date 28/02/11 16:51

Consultation Point Policy CS8 - Developing a Sustainable Transport Network

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

Legal compliance

Do you consider the DPD is legally compliant? Yes

Soundness

Do you consider the DPD is sound? No

Unsound

Do you consider the DPD is unsound because it is not: (2) Effective

Changes necessary for legal compliance and soundness

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 in the question above (Justified/ Effective/ Consistent with National Policy) 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.

CS8 B) safeguarding land as shown on the proposals map for Crossrail 2 Line - Add - release any surplus land not required in the implementation of the proposed infrastructure for development of other uses.

Respondent ID: 405645

6 Representations submitted (csps226 – csps231)

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: 405645 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	Mrs	
First name	Joanne	
Last name	Woodward	
Job title (where relevant)	Head of Planning Policy	
Organisation (where relevant)	London Borough of Enfield	
Address		
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: London Borough of Enfield

For office use only
Representation ID:
csps226

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	<input style="width: 40px; height: 20px;" type="text" value="x"/>	No	<input style="width: 40px; height: 20px;" type="text"/>
(2) Sound	Yes	<input style="width: 40px; height: 20px;" type="text"/>	No	<input style="width: 40px; height: 20px;" type="text" value="x"/>

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	<input style="width: 40px; height: 20px;" type="text"/>
(2) Effective	<input style="width: 40px; height: 20px;" type="text" value="x"/>
(3) Consistent with national policy	<input style="width: 40px; height: 20px;" type="text"/>

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.

In order to strengthen the soundness of this section, it is suggested that minor changes are made to provide greater clarity in relation to the coherence between the Core Strategy and the strategies of neighbouring authorities, in particular with reference to Enfield Council's proposed regeneration of the Central Leaside area, located just beyond Waltham Forest's western boundary.

The key diagram (pg 41) refers to the Upper Lea Valley Opportunity Area and identifies Central Leaside as having the potential to deliver up to 5,000 new homes. Paragraph 2.2 of the document also refers to the potential opportunities and benefits that the regeneration of the Central Leaside area will bring for Waltham Forest's residents. The Council welcomes the reference to the Central Leaside area and the recognition of the Upper Lee Valley Opportunity Area.

General references are made within the document to the strategic location of Waltham Forest in relation to projects in adjoining boroughs, however there is no clear statement setting out Waltham Forest's commitment to working with neighbouring boroughs on strategic projects.

(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.

In light of the significant growth and potential opportunities proposed for the Central Leaside area, it is suggested that minor changes are made within this section to make reference to the Central Leaside Area Action Plan (AAP) and Meridian Water Masterplan that Enfield Council is currently developing for the area close to the borough boundary, and to the opportunity for joint working with neighbouring boroughs.

It is acknowledged that there are references within the document to the strategic location of Waltham Forest in relation to projects in adjoining boroughs, however a clear and easy to find statement setting out these strategic projects and Waltham Forest's commitment to working with neighbouring boroughs is recommended to strengthen the soundness of the 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, 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: 28/02/2011

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

Part B

For office use only
Representation ID:
csps227

Please use a separate sheet for each representation

Name or organisation: London Borough of Enfield

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

Paragraph

6.7

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:

(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.

Section 6 of the document sets out Waltham Forest's commitment to making the most efficient use of employment land and, in particular, the retention of Strategic Industrial Locations (SILs). The retention of Waltham Forest's Central Leaside employment area (Figure 10) as a SIL complements the retention of the SIL to the eastern portion of Enfield's Central Leaside area. The Council therefore supports this designation.

(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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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.

Part B

Please use a separate sheet for each representation

Name or organisation: London Borough of Enfield

For office use only
Representation ID:
csps228

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.

Waltham Forest's commitment to exploring opportunities to promote and facilitate the delivery of decentralised energy networks, both within the borough and sub-regionally, is set out in section 8 of the document. Enfield Council welcomes this commitment and looks forward to working with Waltham Forest Council and the other Upper Lea Valley boroughs to bring forward opportunities for decentralised energy production within the Upper Lea Valley Opportunity Area.

(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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(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:

(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.

Part B

Please use a separate sheet for each representation

Name or organisation: London Borough of Enfield

For office use only
Representation ID:
 csps229

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 new transport section (page 102) and core policy set out Waltham Forest's aims to develop sustainable transport networks. The references made to improvements in the orbital and north-south public transport connections to the Upper Lea Valley Opportunity area are welcomed. The aim to accommodate the growth in travel demand resulting from the anticipated growth planned for Waltham Forest and the sub-region is also welcomed.

(continue on a separate sheet if necessary)

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(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

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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: 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: London Borough of Enfield

For office use only
Representation ID:
 csps230

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.

This section recognises the importance of strategic transport infrastructure improvements and refers to a number of key 'potential connectivity opportunities' to support the planned growth for Waltham Forest and the wider north and east London sub-regions. Potential opportunities to improve east-west connections have been identified between Chingford and Edmonton Green, however although reference is made to the potential opportunities arising from Enfield Council's proposed regeneration of the Central Leaside area, there is no reference to investigating opportunities to improve connections into this area.

(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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Enfield Council would welcome the opportunity to work with Waltham Forest Council to explore opportunities for improved access to the Central Leaside area and therefore requests that reference is made in the document to investigating east-west connections into the this area. This minor change will help to strengthen the soundness of this section.

(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: 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: London Borough of Enfield

For office use only
Representation ID:
csp5231

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

Paragraph

11.11

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.

Greater clarity is required to ensure the plans set out in this section are coherent with strategies of neighbouring authorities, specifically in relation to the proposals to upgrade the West Anglia Main Line as part of the strategic London-Stansted-Cambridge-Peterborough Growth corridor.

Paragraph 11.11 proposes the re-introduction of the Hall Farm Curve and the re-opening of Lea Bridge Station to stimulate and facilitate growth in the borough and the sub-region. Enfield Council is keen to ensure that these proposals do not compromise proposals to upgrade the West Anglia Main Line. The Council therefore requests that reference is made within this section to working with partners and neighbouring boroughs on this project.

(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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Enfield Council requests that reference is made within this section to working with partners and neighbouring boroughs on this project to ensure that the Hall Farm Curve and Lea Bridge Station proposals do not compromise proposals to upgrade the West Anglia Main Line.

(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: 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.

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: 406010 Date received: 28/10/2011

<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		Angela
Last name		Parikh
Job title (where relevant)		Planner
Organisation (where relevant)	Universal Church of the Kingdom of God (UCKG)	DP9
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

Name or organisation: UCKG c/o DP9

For office use only
Representation ID:
csps194

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.

Paragraph 3.12 of the Spatial Vision for Waltham Forest in 2026 refers to the Borough's achievements in creating a cohesive and multi-cultural community:

"Finally, one of our proudest achievements over the past 15 years has been the manner in which we have successfully tackled the root causes of social and economic exclusion. Our community now is celebrated as one of the most diverse in the UK and is acknowledged as an exemplar of how multi-cultural Britain works to everyone's advantage."

The UCKG supports the Borough's goal in enhancing access to facilities for the community. They involve securing the restoration of a much loved listed building which will be opened up for hire and enjoyment by the community and the HelpCentre will be a positive addition to the town centre providing a range of facilities and services to support the local community.

The UCKG has submitted a Statement of Operational Intent and a Community Access Statement that set out how the proposals will incorporate access to the community. The UCKG is proud to own listed buildings and welcomes custody of them as part of its community outreach. It does not operate them as museums and expects them to play a strong role in support of its local congregation and its needs as well as the needs of the community at large.

(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.

(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: 4 March 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: UCKG c/o DP9

For office use only

Representation ID:
csp195

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

Paragraph

7.8

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.

Paragraph 7.8 (Social Infrastructure) seeks the use of social infrastructure to improve resident's quality of life which includes access to faith centres:

"The quantity, quality and accessibility of social infrastructure such as libraries, health facilities, community and faith centre, emergency services and educational services, will often directly contribute to the quality of life within the Borough. Without the necessary infrastructure in place [social infrastructure], the vital needs of residents can be neglected, reducing the quality of life and making Waltham Forest unattractive to residents as well as potential newcomers."

The UCKG supports the Council's belief that faith centres represent social infrastructure that is essential to improving people's quality of life. The UCKG is highly adaptive, listening to and identifying the needs of its members and new comers. This combined with the Pentecostal belief system means that members are likely to get more from their church. 3,000 people who are resident within the Borough currently either attend a HelpCentre outside the Borough or are not able to attend at all. The former Granada cinema was chosen as a site with excellent public transport links and also because the building had the desired capacity and layout to accommodate the require uses.

(continue on a separate sheet if necessary)

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Yes, I wish to participate at the oral examination

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Signature: _____

Date: 4 March 2011

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Part B

Please use a separate sheet for each representation

Name or organisation: UCKG c/o DP9

For office use only
Representation ID:
csp196

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

Paragraph

7.12

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.

Paragraph 7.12 (Social Infrastructure) deals with the protection of existing community uses and significance of location for new community uses:

"It will be very important to safeguard sites for future education, health and community service needs and also protect existing sites and premises. Furthermore, community facilities and services need to be located in the right places so that they have maximum accessibility for their potential users, some may be best located in town centres whilst other services and facilities may be better located close to the communities."

The UCKG supports the Borough's goal in enhancing access to facilities for the community. They involve securing the restoration of a much loved listed building which will be opened up for hire and enjoyment by the community and the HelpCentre will be a positive addition to the town centre providing a range of facilities and services to support the local community.

The UCKG has submitted a Statement of Operational Intent and a Community Access Statement that set out how the proposals will incorporate access to the community. The UCKG is proud to own listed buildings and welcomes custody of them as part of its community outreach. It does not operate them as museums and expects them to play a strong role in support of its local congregation and its needs as well as the needs of the community at large.

(continue on a separate sheet if necessary)

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(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

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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: 4 March 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: UCKG c/o DP9

For office use only

Representation ID:
csps197

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

Paragraph

13.2

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.

Paragraph 13.2 refers to Figure 21 (Map of Benefit Claimants, Source: Department for Work and Pensions, Feb 2010), this figure shows Hoe Street has areas of claimant rates that are 25% and over (as of February 2010).

The UCKG supports the Borough's goal in reducing inequalities and enhancing access to facilities that offer economic opportunities for residents. The UCKG HelpCentre's outreach activities seek to address pressing social problems that society faces today. In practice this covers an extensive range of activities from counselling and support for all comers to youth and senior groups, the provision of Training Centres as well as support for a variety of well-known, national charities.

(continue on a separate sheet if necessary)

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Signature: _____

Date: 4 March 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: **UCKG c/o DP9**

For office use only

Representation ID:
csp199

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

Paragraph

14.10

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

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Paragraph 14.10 (Visitor Attractions) seeks to concentrate new developments that are likely to result in large numbers of visitors in Walthamstow town centres:

"the accessibility of Walthamstow town centre means it should be the main focus for new developments likely to result in a large number of visitors. This will be essential in realising one of the key commitments in the Waltham Forest Sustainable Community Strategy, namely to 'transform Walthamstow town centre into an asset for the Borough, with quality shopping, healthy businesses and workspace, leisure, an iconic market and cinema, and vibrant day and evening economies.'"

As stated above, the application site is considered to be located within a peripheral area of the designated town centre and therefore the proposed mix of uses are considered to be most appropriate in terms of location in achieving the town centre objectives as set out by the Council. In addition, the use of the building for leisure purposes (cinema use in particular) was found to be unviable by an independent market appraisal that was submitted as part of the proposals. This report concluded that a cinema use would be unviable due to the restoration costs associated with bringing the building back in use.

(continue on a separate sheet if necessary)

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Part B

Please use a separate sheet for each representation

Name or organisation: UCKG c/o DP9

For office use only

Representation ID:
csp200

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

Paragraph

15.18

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.

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(1) Justified

(2) Effective

(3) Consistent with national policy

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Paragraph 15.18 (Heritage-Led Regeneration) cites heritage protection as being a catalyst for regeneration and reinforcing a sense of community:

"Integrating heritage building into urban regeneration schemes has been shown to create popular, successful places with character. The historic environment lies at the heart of our sense of place and can be a valuable catalyst for regeneration. Particularly in town centres, historic buildings can provide a foundation for regeneration. Regenerating buildings can reinforce a sense of community and make an important contribution to the local economy. It can also act as a catalyst for improvements to the wider area. Through sensitive adaptations, new uses would be allowed in old buildings."

The UCKG supports the significance placed on the Borough's heritage assets in terms of their potential to be the focus for regeneration initiatives providing a sense of community. The application proposals will result in the restoration of a Grade II* listed building which is currently on the English Heritage Buildings at Risk Register. It will repair the damage inflicted on the listed fabric, including the subdivision of the main auditorium and vandalism. The proposed Granada Rooms, available for hire, would provide public access to large areas of the building allowing local people to both utilise and enjoy the listed buildings. The main auditorium would also be open to the public (but not for hire) at certain times by the UCKG HelpCentre.

The UCKG have submitted a PPS5 statement to assess the application proposals in light of the latest national heritage planning policy. It is considered that the proposals are in line with Government aspirations for conservation of the historic environment. The proposals will enhance vitality and viability by bringing an important historic building back into use for the enjoyment of the community as a whole and will result in the restoration of the heritage asset.

(continue on a separate sheet if necessary)

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Date: 4 March 2011

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Part B

Please use a separate sheet for each representation

Name or organisation: UCKG c/o DP9

For office use only
Representation ID:
csps201

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.

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(1) Justified

(2) Effective

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Paragraph 15.19 (Access to Historic Assets) seeks to increase the accessibility of heritage assets to the public:

"Where possible, the Council will seek to open up and provide wider public access to all heritage assets."

The UCKG supports the significance placed on the Borough's heritage assets in terms of their potential to be the focus for regeneration initiatives providing a sense of community. The application proposals will result in the restoration of a Grade II* listed building which is currently on the English Heritage Buildings at Risk Register. It will repair the damage inflicted on the listed fabric, including the subdivision of the main auditorium and vandalism. The proposed Granada Rooms, available for hire, would provide public access to large areas of the building allowing local people to both utilise and enjoy the listed buildings. The main auditorium would also be open to the public (but not for hire) at certain times by the UCKG HelpCentre.

In terms of achieving greater physical access to the public, the proposals incorporate new level access from the street and a new lift so that all levels can be easily accessed.

The UCKG have submitted a PPS5 statement to assess the application proposals in light of the latest national heritage planning policy. It is considered that the proposals are in line with Government aspirations for conservation of the historic environment. The proposals will enhance vitality and viability by bringing an important historic building back into use for the enjoyment of the community as a whole and will result in the restoration of the heritage asset.

(continue on a separate sheet if necessary)

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Part B

Please use a separate sheet for each representation

Name or organisation: UCKG c/o DP9

For office use only

Representation ID:
csps202

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.

Policy CS10 also seek the delivery of such facilities in suitable locations:

"Promoting the delivery of additional educational and training facilities in suitable locations, in both new and existing developments"

The UCKG supports the Borough's goal in reducing inequalities and enhancing access to facilities that offer economic opportunities for residents. The UCKG HelpCentre's outreach activities seek to address pressing social problems that society faces today. In practice this covers an extensive range of activities from counselling and support for all comers to youth and senior groups, the provision of Training Centres as well as support for a variety of well-known, national charities.

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Part B

Please use a separate sheet for each representation

Name or organisation: UCKG c/o DP9

For office use only
Representation ID:
csp203

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

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Policy CS12 (Protecting and Enhancing Heritage Assets) sets out various ways in which the Borough can achieve Strategic Objective 12:

"In managing growth and change, the Council will promote the conservation, enhancement and enjoyment of the historic environment by:

A) conserving and enhancing the significance of the Borough's heritage assets and their settings such as...listed buildings..."

D) Promoting heritage-led regeneration and seeking appropriate beneficial uses and improvements to historic buildings, spaces and areas;

E) Ensuring improved access to historic assets and improved understanding of the Borough's history."

The UCKG supports the significance placed on the Borough's heritage assets in terms of their potential to be the focus for regeneration initiatives providing a sense of community. The application proposals will result in the restoration of a Grade II* listed building which is currently on the English Heritage Buildings at Risk Register. It will repair the damage inflicted on the listed fabric, including the subdivision of the main auditorium and vandalism. The proposed Granada Rooms, available for hire, would provide public access to large areas of the building allowing local people to both utilise and enjoy the listed buildings. The main auditorium would also be open to the public (but not for hire) at certain times by the UCKG HelpCentre.

The UCKG have submitted a PPS5 statement to assess the application proposals in light of the latest national

heritage planning policy. It is considered that the proposals are in line with Government aspirations for conservation of the historic environment. The proposals will enhance vitality and viability by bringing an important historic building back into use for the enjoyment of the community as a whole and will result in the restoration of the heritage asset.

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Signature: _____

Date: 4 March 2011

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Part B

Please use a separate sheet for each representation

Name or organisation: UCKG c/o DP9

For office use only

Representation ID:
csps204

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

Paragraph

Policy

CS14

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

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Policy CS14 (Attractive and Vibrant Town Centres) states that certain uses will be directed towards the designated town centre using the sequential test in order to concentrate this mix of uses together, thereby promoting vitality and vibrancy in the Borough:

"The Council will promote successful and vibrant centres throughout the Borough to serve the needs of residents, workers, visitors by:

...ensuring that new proposals for town centre uses including retail, leisure, office, entertainment, hotel, community, cultural and service uses etc are directed to the designated centres through the 'sequential test', whilst also ensuring that the scale of development proposed in a centre is appropriate to the role and character of the centre and its catchment."

The UCKG supports the Council's intention to direct certain uses to the town centre in order to create areas of vibrancy and economic growth. The application site is considered to be located within a peripheral area of the designated town centre and the proposed mix of community, retail and café uses would be an appropriate town centre use which can stimulate shopping contributing to the overall vitality and viability of the town centre.

(continue on a separate sheet if necessary)

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Signature: _____

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Part B

Please use a separate sheet for each representation

Name or organisation: UCKG c/o DP9

For office use only
Representation ID:
csps205

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.

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Strategic Objective 4 details the use of social infrastructure as a way of continuing the success achieved in the local community:

“Ensure the timely delivery of appropriate social infrastructure, to strengthen the community, and reduce existing deprivation in the Borough.”

The UCKG supports the Borough’s goal in enhancing access to facilities for the community. The proposed works of the UCKG are synonymous with SO4. They involve securing the restoration of a much loved listed building which will be opened up for hire and enjoyment by the community and the HelpCentre will be a positive addition to the town centre providing a range of facilities and services to support the local community.

The UCKG has submitted a Statement of Operational Intent and a Community Access Statement that set out how the proposals will incorporate access to the community. The UCKG is proud to own listed buildings and welcomes custody of them as part of its community outreach. It does not operate them as museums and expects them to play a strong role in support of its local congregation and its needs as well as the needs of the community at large.

(continue on a separate sheet if necessary)

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