

Waltham Forest Local Development Framework



Core Strategy - Submission

Summary of Main Issues - Regulation 30(1)(e)

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1 About this Document

1.1 The Waltham Forest Local Development Framework (LDF) Core Strategy Proposed Submission Document was published for statutory consultation during the period 17 January 2011 to 28 February 2011 for representations to be made on the soundness and legal compliance of the document.

1.2 This document has been prepared in accordance with Regulation 30(1)(e) of the Town and Country Planning (Local Development)(England)(Amendment) Regulations 2008 and sets out:

- how many representations were made on the Waltham Forest LDF Core Strategy Proposed Submission Document and provides a summary of the main issues raised in those representations.

1.3 Information on consultations undertaken and representations received at the earlier stages of the preparation of the Waltham Forest LDF Core Strategy is included in a separate document prepared under the Regulation 30 (1)(d) of the Town and Country Planning (Local Development)(England)(Amendment) Regulations 2008.

Representations Made (Regulation 28)

1.4 In total 249 representations were received from 48 consultees. The schedule below contains a summary of the main issues raised in the representations. These are the matters of soundness as considered by consultees.

2 Introduction, What Makes Waltham Forest Unique, Vision and Strategic Objectives

Consultee Ref. No.	Summary of Main Issues
New Lammas Lands Defence Committee (CSPS155) (CSP156)	Paragraph 2.23 does not show any preference for locating new homes within existing urban areas away from Metropolitan Open Land Para 2.38 - there seems to be no robust commitment to preserving the historic environment, and no mention of historical landscapes such as the Lea Valley Marshlands.
Thames Water Property (CSPS167)	Paragraph 2.57 makes no reference to physical or utilities infrastructure.
Superintendent of Epping Forest (CSPS73)	Vision statement (paragraph 3.10) and Strategic Objective 6 should identify ways in which the green infrastructure of open spaces would be accessible by 2026, particularly in the context of accommodating increased population and improving the environment. Suggested change to paragraph 3.10.

3 Policy CS1 - Location and Management of Growth

Consultee Ref. No.	Summary of Main Issues
Lee Valley Regional Planning Authority (CSPS34)	The Lee Valley Regional Park should be identified on the Key Diagram.
Olympic Park Legacy Company (CSPS233)	Need to extend the NOF AAP area to include areas in and around Leyton - as shown on the Key Diagram.
New Lammas Lands Defence Committee (CSPS157) (CSPS158)	Too much detail is left for the emerging AAP. Consultation on the NOF AAP is premature - in view of emerging plans being prepared by the Lee Valley Regional Park Authority.
UK Power Networks (CSPS253) (CSPS254) (CSPS255) (CSPS252) (CSPS75) (CSPS72)	<p>The Northern Olympic Fringe (NOF) area should be extended eastwards to include further opportunity sites. The delineation of the southern boundary of the NOF AAP area appears to be arbitrary.</p> <p>The definition of key growth areas should be provided.</p> <p>Regarding the land safeguarded for Crossrail 2 extension, the issue of blight should be addressed.</p>

Consultee Ref. No.	Summary of Main Issues
GLA (CSPS241)	Thames Water site mentioned in paragraph 4.17 is within the Green Belt and MOL. It should not be presumed that housing will be acceptable on this site.
The Mall Ltd Partnership (CSPS183) (CSPS182)	Specific details from the Walthamstow IPPF should be removed so as not to prejudice alternative options for the emerging AAP. There is inconsistency between Policy CS1A and CS1B regarding town centre uses as defined by PPS4.
English Heritage (CSPS134)	The second sentence of paragraph 4.28 should be amended to recognise the implications on local character arising from the intensification of development. It is necessary to consider the significance of the historic environment and wider local character as part of the process of locating and managing growth. There is need to introduce additional criteria under Policy CS1 (E) to reflect this.
London & Quadrant Housing Trust (CSPS53) (CSPS52)	Regarding paragraph 4.30, it is not appropriate to defer the determination of a planning application until the Site Allocations Document has been prepared.
Save Our Stow (CSPS66) (CSPS65)	Need to remove reference to Walthamstow Dogs Stadium as a development site.
Rapleys (CSPS36)	Regarding paragraphs 4.34-4.35, the Kingfisher Sports Ground should be de-designated as Green Belt and included within the boundaries of Waltham Park Way Borough Employment Area.

Consultee Ref. No.	Summary of Main Issues
(CSPS37) (CSPS35)	Policy CS1 E(i) - the word 'integrity' does not define what the Council is trying to achieve. An alternative use of open space, recreational space or green belt land should be welcomed.
Environment Agency (CSPS30)	There is no mention of the PPS25 sequential test undertaken on the Core Strategy.
Olympic Delivery Authority (CSPS8)	The reference to a tariff charging schedule should be revised to take account of Community Infrastructure Regulations which prevent the use of local tariffs beyond 2014.
Thames Water Property (CSPS175)	The Deephams Sewage Treatment Works project should have specific policy support in the Core Strategy.
George Trevor Goodchild (CSPS28)	Objects to the proposed residential development at the Whipps Cross Hospital site.
Workspace Group (CSPS189)	Policy CS1 (E) (iv) lacks flexibility. A change to the policy wording should be made to ensure that land is utilised for economic purposes.
Simon Munk (CSPS2)	Appropriate infrastructure provision has not been made to accommodate proposed growth.

4 Policy CS2 - Improving Housing Quality and Choice

Consultee Ref. No.	Summary of Main Issues
Greater London Authority csps243	<p>The Council should acknowledge Waltham Forest's valuable contribution to housing in London and the need to consider housing from a strategic perspective, as well as a local one.</p> <p>The Council will need to consider how it will address the recent proposed changes to the PPS3 definition of affordable housing.</p> <p>The Council should consider the role HMOs play in providing a low-cost and flexible housing option. The need to increase the supply of family housing in the borough should be sufficiently weighed against the need for HMOs. A balance has to be struck between realising the potential of residential conversions, especially those which meet the needs of smaller households.</p> <p>The requirement for older and vulnerable people does not take sufficient account of the strategic needs.</p>
London Borough of Redbridge csps223	The wording of Policy CS2 may result in an overprovision of larger family market units which would place greater pressure on meeting identified housing need and have a knock on effect to neighbouring boroughs such as Redbridge. Policy CS2 should only priorities the need for larger affordable homes in new development.
London & Quadrant Housing Trust, csps55	Clarity is sought in relation to the level of affordable housing being assessed on a site-by-site basis and be subject to a viability assessment.

Consultee Ref. No.	Summary of Main Issues
<p>Workspace Group csps190</p>	<p>The affordable housing policy has not been based on an affordable housing viability assessment.</p> <p>The requirement to provide a minimum of 50% affordable housing on development sites is unsound as it not based on reliable information. This approach will potentially impact upon the viability of development schemes in the borough.</p> <p>The level of affordable housing will need to be assessed on a site by site basis with targets being subject to wider planning, economic viability, regeneration and sustainability considerations and will require a flexible approach to specific site negotiation.</p> <p>The requirement for 60% of affordable to social rented housing and 40% to be intermediate housing is inflexible.</p>
<p>The Olympic Park Legacy Company csps234</p>	<p>The minimum requirement of 50% affordable housing has been justified as it is not consistent with national and regional policies.</p> <p>It is also 'material' to consider the availability of public subsidy when assessing viability.</p>
<p>Simon Munk csps3</p>	<p>Policy does not effectively deal with the rented property market or private landlords in terms of ensuring housing stock is of good quality and that is in use. It does not state how it will bring empty properties back into use.</p>
<p>Greater London Authority csps245</p>	<p>There is concern about the promotion of a dynamic viability tool as a basis for assessing the future level of affordable housing contribution.</p>
<p>London & Quadrant Housing Trust</p>	<p>Support for the uses of the dynamic viability model but there should be assurance that this would not be put in place until such time as more detailed guidance has been issued and this has been formally consulted on.</p>

Consultee Ref. No.	Summary of Main Issues
(Agent: Mr Adrian Kearley, AKA Planning) csps57	
Kennet Properties (For Thames Water) csps164	Inadequate demonstration that there are sufficient sites to meet housing and affordable housing demand in the early stages of the Core Strategy.
New Lammas Lands Defence Committee csps159	No robust policy/implementation on how good housing design will be achieved or enforced, or how poor development design will be discouraged.
Greater London Authority csps247	The council is asked to consider whether the promotion and support for student accommodation could be appropriate.

5 Policy CS3 - Making Efficient Use of Employment Land

Consultee Ref. No.	Summary of Main Issues
Cunningham (CSPS 69/70)	Unhappy with extent of Sutherland Road employment designation given recent moves towards residential in the area.
Hollivale Ltd, MacDonald Egan (CSPS186)	Blackhorse Lane Strategic Industrial Land (SIL) de-designation does not accurately reflect land ownership and what is likely to be developed for mixed use.
London Development Agency (CSPS108)	Mixed use should be allowed at SIL designation at Orient Way if Hall Farm curve is reinstated and 97 Lea Bridge Rd goes for landmark development.
Cunningham (CSPS71)	Employment designations should reflect where residential is allowed as contained in the Blackhorse Lane Interim Planning Policy Framework and planning briefs.
Rapleys (CSPS38)	Kingfisher Sports Ground should be designated as Borough Employment Area rather than Green Belt.
Mehmet Balaman (CSPS217)	No.14 Burwell Road should de-designated from SIL due to lack of marketability of site for manufacturing/ warehouse use based on poor access and nuisance to neighbouring residential occupiers.
Firat Posluoglu (CSPS216)	No.14 Burwell Road should be de-designated from SIL due to lack of marketability of site for manufacturing/ warehouse use based on poor access and nuisance to neighbouring residential occupiers.
Olympic Park Legacy Company (CSPS235)	Reference should be made to the Olympic Legacy Supplementary Planning Guidance.
GL Hearn (for Tesco Stores) (CSPS148)	To reflect the recent planning consent for mixed use, the MURA1 designation should not be carried forward.

Consultee Ref. No.	Summary of Main Issues
Workspace Group (CSPS191)	There should be allowance for mixed use schemes in SIL to allow for creative/ SMEs etc, and/ or release of Uplands Business Park from SIL.

6 Policy CS4 - Providing Infrastructure

Consultee Ref. No.	Summary of Main Issues
Thames Water Property (CSPS172) (CSPS169)	<p>The relevance and meaning of the last three sentences of paragraph 7.21 is unclear and should be reworded or removed.</p> <p>The wording of CS4 should include a specific policy in respect of utilities infrastructure to make it clear that planning permission will not be granted where developers have not demonstrated that adequate water supply and waste treatment capacity exist both on and off site to service the development.</p>
Simon Munk (CSPS4)	<p>The Council has not appropriately or effectively planned for the necessary infrastructure to support new housing. Paragraph 7.24 is ineffective as it does not put forward any planned or coordinated response to predicted need.</p>
Her Majesty's Court Service (CSPS232)	<p>The Court Service should be included within the definition of social infrastructure.</p>
The Metropolitan Police (CSPS165)	<p>Objects to emergency services being listed as physical infrastructure in in paragraph 7.3.</p> <p>No exceptions are given regarding the loss of existing social infrastructure facilities and this is inconsistent with the emerging Development Management Policies Document (Policy DM18).</p>

7 Policy CS5 - Minimising and Adapting to Climate Change

Consultee Ref. No.	Summary of Main Issues
Environment Agency (csps31)	Need to include reference that a Sequential Test has been carried out by the Council covering regeneration areas.
Aviva Life and Pensions UK Ltd (csps181)	Compliance with standards such as BREEAM and Code for Sustainable Homes are dealt with under Building Regulations. Planning policies should not replicate scope of other legislative requirements. Request that policy should refer to requirements of Building Regulation as the required standard for developments to achieve.
Greater London Authority (csps248)	CS5 contains little detail on how the policy would be applied and should be expanded in line with Policies 5.3, 5.6 and 5.7 of the draft replacement London Plan.
Greater London Authority (csps248)	Targets for CO2 emissions should be included in the Plan in accordance with Policy 5.2 of the draft replacement London Plan.
English Heritage (csps135)	Include a reference within CS5 and supporting text that climate change infrastructure are chosen and installed in a manner that avoids causing harm to heritage assets. Add cross-reference to policies in chapter 15.
Workspace Group (csps192)	Policy fails to refer to viability and feasibility and as such is not compliant with PPS 1. The London Plan and Building Regulation provide sufficient policy cover. Proposals need to be evidence based and viable.
The Mall Limited Partnership (csps185)	Compliance with standards such as BREEAM and Code for Sustainable Homes are dealt with under Building Regulations. Planning policies should not replicate scope of other legislative requirements. Request that policy should refer to requirements of Building Regulation as the required standard for developments to achieve.

8 Policy CS6 - Enhancing Green Infrastructure and Biodiversity

Consultee Ref. No.	Summary of Main Issues
Natural England csps213	There is need for robust mitigation measures.
Kennet Properties (For Thames Water) csps162 csps 163	De-designation of Metropolitan Open Land (MOL) at the Thames Water site should be considered.
Superintendent of Epping Forest, City of London csps92	Paragraph 9.13 - Insertion of '(SAC/SSSI)' after Epping Forest.
Superintendent of Epping Forest, City of London csps79	Change of wording for paragraph 9.15 to strengthen the information on Epping Forest.
Superintendent of Epping Forest, City of London csps93	Change of wording for paragraph 9.18 to strengthen the information on Epping Forest.
Sandra MacPhee csps218	Reference should be made to the impact of air pollution caused by vehicles to Epping Forest.

Consultee Ref. No.	Summary of Main Issues
Superintendent of Epping Forest, City of London csps96	Reference should be made to creating a link from Epping Forest to the Riding Centre in paragraph 9.31.
Superintendent of Epping Forest, City of London csps99	With reference to paragraph 9.33 regarding the preparation of a Tree Strategy, there is need to increase tree coverage across the borough and for native species to be encouraged.
New Lammas Lands Defence Committee csps160	Need to include the requirement in the original UDP (not the current UDP) for no buildings adjacent to MOL to be over 5 storeys in height.
Superintendent of Epping Forest, City of London csps88 csps84	Need to change of the wording of paragraphs 9.4 and 9.7 to strengthen the information on Epping Forest.
Rapleys csps39 csps40	De-designation of the Green Belt at the Kingfisher Sports Ground should be considered.
English Heritage csps136	Need to change the wording of Policy CS6 (B) to strengthen the importance of the historic value of green spaces.
Natural England csps211	The policy should support and contribute to the Lee Valley Regional Park Development Framework (2011) aims and objectives with regards to the natural environment.

Consultee Ref. No.	Summary of Main Issues
London & Quadrant Housing Trust (Agent: Mr Adrian Kearley, AKA Planning) csps61	Development especially at key sites should involve the creation of additional open space and facilities.
The Olympic Park Legacy Company csps236	Clarification is required that the green link between Leyton Mills and Eton Manor is being proposed by the Northern Olympic Fringe AAP.
Superintendent of Epping Forest, City of London csps91	Need to include reference about the Council's status as a Competent Authority under the Habitats Regulations 2010 and responsibility to enhance biodiversity. Need to include a new policy to cover Epping Forest.

9 Policy CS7 - Promoting Sustainable Waste Management and Recycling

Consultee Ref. No.	Summary of Main Issues
Greater London Authority (csps249)	To be in general conformity with the London Plan, policy CS7 needs to provide reference to apportionment and recycling targets in the policy and not just in the supporting test.

10 Policy CS8 - Developing Sustainable Transport

Consultee Ref. No.	Summary of Main Issues
London Borough of Enfield (csps231)	Requests reference to working with partners and neighbouring boroughs on Hall Farm Curve.
English Heritage (csps137)	Include reference that streets are spaces in their own right as well as conduits for traffic and public realm treatments should be designated to reflect this, for example to draw out their historic character. Need to reference English Heritage Guidance document "streets for All" to facilitate this approach.
Paul Thomson, Epping Forest (csps102)	<p>Include the following text in order to take account of the importance of the Forest, the existence of the Forest Transport Strategy and the need to reduce the Forest's fragmentation whilst providing enhanced access to Forest visitors across all Forest sites within the Borough:</p> <p>"The Council will work with the Conservators of Epping Forest through the Forest Transport Strategy to enhance and upgrade crossing points between areas of Forest, gateways into the Forest and reduce the impact of traffic and increase safety at hotspots like Whipps Cross Road, Leytonstone and at the Queen Elizabeth's Hunting Lodge, Chingford."</p>
Paul Thomson, Epping Forest (csps100)	<p>Need to include a sentence to recognise the Epping Forest Transport Strategy and a partnership with the Conservators of Epping Forest to ensure a reduced impact of vehicular transport on the environs of the Forest, whilst aiming to improve sustainable transport access points to the Forest.</p> <p>"Working with the Conservators of Epping Forest to reduce the impact of motorised traffic and its associated pollution on the Forest and with the concomitant aim of improving access by sustainable transport means"</p>
UK Power Networks (operation) Ltd (csps 256)	Need to amend policy CS8 (B) to include the release of any surplus land not required in the implementation of the proposed Crossrail 2 Line for the development of other uses.

11 Policy CS9 - Promoting Better Education

Consultee Ref. No.	Summary of Main Issues
No Issues	None

12 Policy CS10 - Creating More Jobs and Reducing Worklessness

Consultee Ref. No.	Summary of Main Issues
The Olympic Delivery Authority CSPS18	Policy CS10 should be re-worded to provide flexibility and clarity by referring to 'established locations that present an appropriate opportunity' and making explicit reference to the Community Infrastructure Levy.

13 Policy CS11- Tourism Development and Visitor Attractions

Consultee Ref. No.	Summary of Main Issues
English Heritage (CSPS138)	Policy CS11 and the justification should make reference to the historic environment as a visitor attraction.
London and Quadrant Housing Trust (CSPS62)	Point (E) of this policy does not apply to attractions that are no longer operational and have no future prospects.
Save Our Stow (CSP67)	Specific mention must be made to the need to protect Walthamstow Greyhound stadium.
New Lammas Lands Defence Committee (CSPS161)	Whilst welcoming the recognition of the potential tourism value of the borough's open spaces, any tendency towards 'disneyfication' of Epping Forest or the Lee Valley Regional Park must be resisted with the presumption that built (new) tourist facilities should be 'designed out'.

14 Policy CS12 - Protecting and Enhancing Heritage Assets

Consultee Ref. No.	Summary of Main Issues
Save Our Stow (CSPS68)	Re: Paragraph 15.3 - the policy should specifically mention the heritage asset of the Walthamstow Dogs Stadium.
Dennis Tilley (CSPS239)	Areas of Special Character have not been mentioned - including Belle Vue Estate.
English Heritage (CSPS139)	Editing changes must be made to reflect the distinctive historic environments of Waltham Forest.
Superintendent of Epping Forest (CSPS105)	Need to make explicit that important heritage assets will be protected. Suggested inclusion of this additional point as Policy CS12 (F) that: 'Planning permission would not be granted for any development or change of use which could prejudice or otherwise affect protected and important heritage assets and their settings, including those assets that lie outside existing conservation areas'.

15 Policy CS13 - Promoting Health and Well-Being

Consultee Ref. No.	Summary of Main Issues
No issues raised	None

16 Policy CS14 - Attractive and Vibrant Town Centres

Consultee Ref. No.	Summary of Main Issues
Barclays Bank CSPS187	Policy should recognise the benefit of bank uses in fostering footfall and pedestrian activity. Policy should not restrict A2 uses in designated frontages.
The Metropolitan Police csps166	Policy support should be given to the provision of policing facilities in town/local centres.

17 Policy CS15 - Well Designed Buildings, Places and Spaces

Consultee Ref. No.	Summary of Main Issues
English Heritage (CSPS141)	The Core Strategy does not deliver a plan-led approach for the management of tall buildings that provides sufficient protection for the historic environment. It does not set out the rationale behind the appropriateness of tall buildings in the borough.
Workspace Group (CSPS193)	The policy is too inflexible and makes no allowance for other factors. It places highest quality of design above all other planning considerations.

18 Policy CS16 - Making Waltham Forest Safer

Consultee Ref. No.	Summary of Main Issues
Metropolitan Police (CSPS87)	Wording changes should be made to reflect the principles and practices of secured by design.

19 Implementation and Monitoring

Consultee Ref. No.	Summary of Main Issues
Olympic Delivery Authority CSPS26	The Infrastructure Delivery Plan (IDP) should be extended to embrace all known investment from private and voluntary sectors in addition to public investment. A review process should be in place for updating the IDP.
Graham Loveland CSPS147	The Infrastructure Delivery Plan (IDP) makes little reference to any strategic flood defence infrastructure. Given the significant flood risk in key growth areas this plan and/relevant Area Action Plans should identify flood defence infrastructure.