London Borough of Waltham Forest

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Development Management Policies Preferred Options

Public Consultation Report

Part 1 - Questionnaire Outcomes
Part 2 - Representations from Consultees and Council's Response

July 2012

Waltham Forest

INTERPRETING AND TRANSLATION ASSISTANCE

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

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INTRODUCTION

This public consultation report is for the Development Management Policies Preferred Options and is divided into two parts:

- Part 1 - Questionnaire Outcomes
- Part 2 - Representations from Consultees and Council's' Response

Part 1 provides the analyses for the questionnaire outcomes. As shown below, the Council received 975 selected options for 37 questions as set out in the questionnaires See Appendix for the questionnaire.

Policy	A	B	C	D	E	F	G	H	I	J	K	L	M	Total
	No. of Selections													
DM1	11	11	11	11	11	10	9	10	10	10	10	10	10	134
DM2	6	6	6	6	6									30
DM3	6	7	5	7	7	7	7							46
DM4	5	4	5											14
DM5	7	6												13
DM6	4	4	4											12
DM7	6	6	7											19
DM8	8	8												16
DM9	6													6
DM10	4	5												9
DM11	5	5	5	5	6	6								32
DM12	4	4	4	4	5									21
DM13	8	8	8	7	8	8	8	8	7					70
DM14	4	4	4	4	4	4	5	5						34
DM15	5	5	5	5	5	5								30
DM16	4	4	4	4										16
DM17	5	6	5	6										22
DM18	5	5	5	5	5	5								30
DM19	4	4	4											12
DM20	5	5	5	5	5	5	5							35
DM21	4	3	3	3	4									17
DM22	3	3	3											9
DM23	9	9	8											26
DM24	6	4	4											14
DM25	4	4	4	4	4	4								24
DM26	5	5	4	4	4	4	4	4	4					38
DM27	4	4	4											12
DM28	5	5	5	5	5	5	5							35
DM29	8	8	8	8	9	9								50
DM30	5	5	5	5										20
DM31	4													4
DM32	7	7	7											21
DM33	5													5
DM34	4	4	4											12
DM35	4	4	4	4	4	6								26
DM36	6	6	6	6	5	6	6							41
DM37	4	4	4	4	4									20
Grand Total														**975**

Part 2 is for the written comments received and the Council's Response. During the consultation on the Development Management Policies Preferred Options from 17 Jan to 28 Feb 2011, there were 214 written comments received from 34 consultees.

Development Management Policies Preferred Options

Public Consultation Report

Part 1

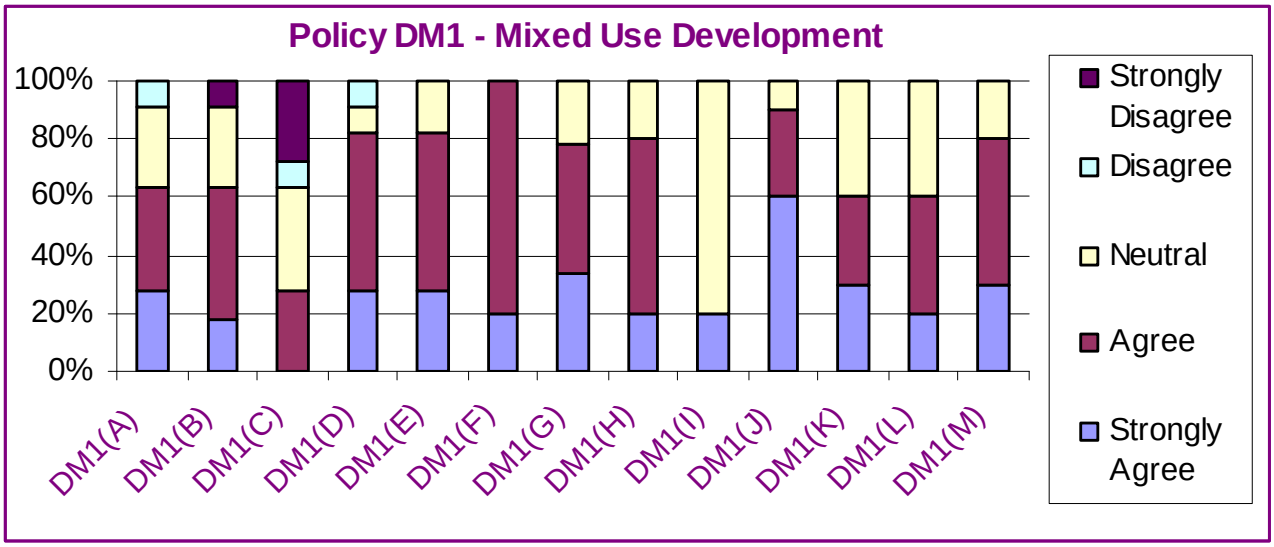
Questionnaire Outcomes

July 2012

Waltham Forest

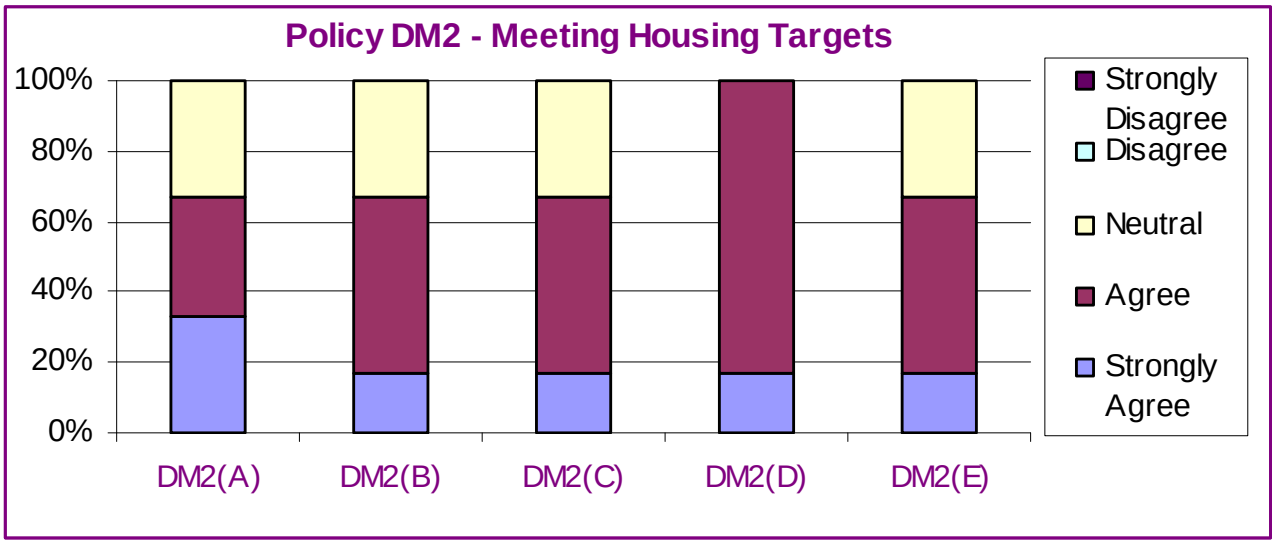
Policy DM1 - Mixed Use Development

Policy	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Total
DM1(A) Mixed use development in key growth areas	3	4	3	1	0	11
	27%	36%	27%	9%	0%	
DM1(B) Mixed use development in other growth centres	2	5	3		1	11
	18%	45%	27%	0%	9%	
DM1(C) Mixed use development in other key sites	0	3	4	1	3	11
	0%	27%	36%	9%	27%	
DM1(D) The character of the development, the site and the area	3	6	1	1	0	11
	27%	55%	9%	9%	0%	
DM1(E) The size of the site and floorspace	3	6	2	0	0	11
	27%	55%	18%	0%	0%	
DM1(F) The function of the proposed development	2	8	0	0	0	10
	20%	80%	0%	0%	0%	
DM1(G) Extension to the gross floor space for an existing user.	3	4	2	0	0	9
	33%	44%	22%	0%	0%	
DM1(H) Active street frontage and natural surveillance.	2	6	2	0	0	10
	20%	60%	20%	0%	0%	
DM1(I) Publicly funded developments	2	0	8	0	0	10
	20%	0%	80%	0%	0%	
DM1(J) The financial and economic viability of the development.	6	3	1	0	0	10
	60%	30%	10%	0%	0%	
DM1(K) Appropriate developers contributions	3	3	4	0	0	10
	30%	30%	40%	0%	0%	
DM1(L) Land use swaps, housing credits and off-site contributions	2	4	4	0	0	10
	20%	40%	40%	0%	0%	
DM1(M) Planning objectives \s a priority for the area.	3	5	2	0	0	10
	30%	50%	20%	0%	0%	



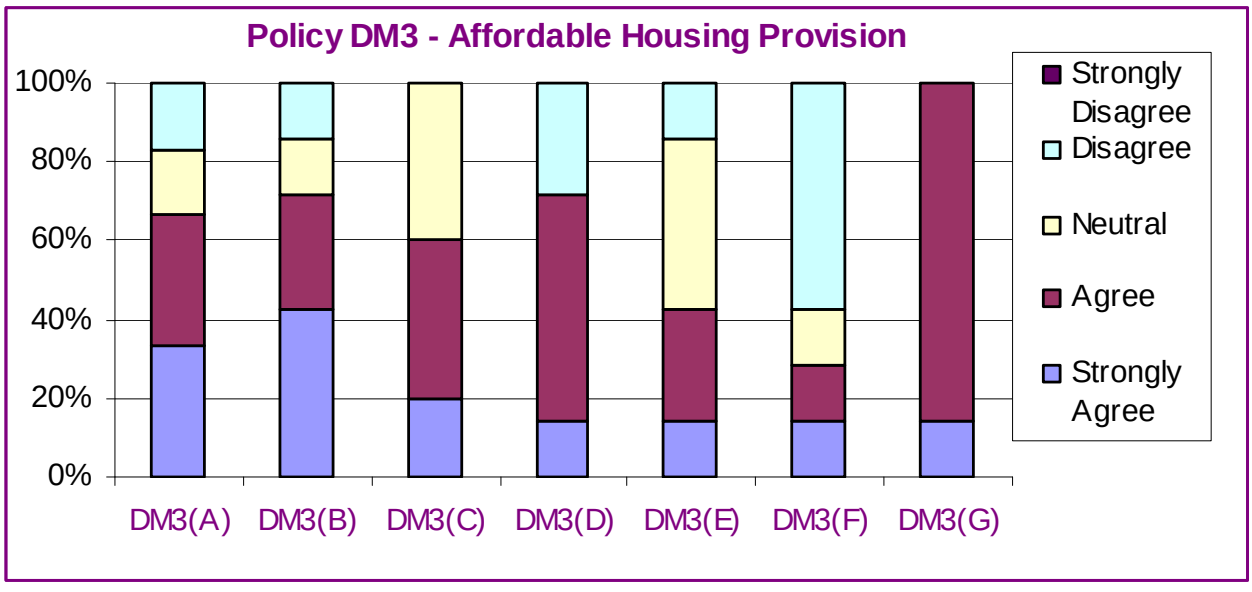
Policy DM2 - Meeting Housing Targets

Policy	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Total
DM2(A) Resisting residential development on back gardens.	2	2	2	0	0	6
	33%	33%	33%	0%	0%	
DM2(B) Allowing the loss of residential accommodation were a larger (three bed plus) home is created.	1	3	2	0	0	6
	17%	50%	33%	0%	0%	
DM2(C) Residential use is no longer compatible with the surrounding environment.	1	3	2	0	0	6
	17%	50%	33%	0%	0%	
DM2(D) An overriding need for an alternative use	1	5	0	0	0	6
	17%	83%	0%	0%	0%	
DM2(E) Redevelopment resulting in a loss of housing for better quality homes.	1	3	2	0	0	6
	17%	50%	33%	0%	0%	



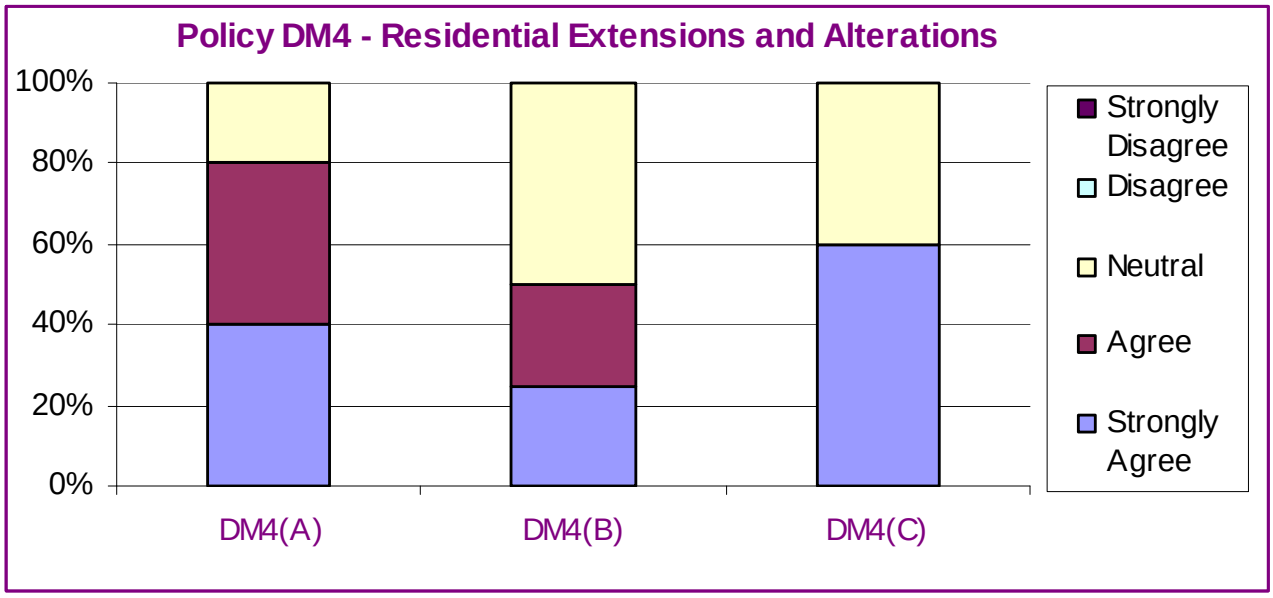
Policy DM3 - Affordable Housing Provision

Policy	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Total
DM3(A) All residential development with 10 or more dwellings to supply affordable housing.	2	2	1	1	0	6
	33%	33%	17%	17%	0%	
DM3(B) Where less than 50% affordable housing, requiring an 'open book' financial appraisal/viability assessment	3	2	1	1	0	7
	43%	29%	14%	14%	0%	
DM3(C) Using 'claw back clauses' in legal agreements.	1	2	2	0	0	5
	20%	40%	40%	0%	0%	
DM3(D) For developments in phases, requiring all phases make affordable contribution.	1	4	0	2	0	7
	14%	57%	0%	29%	0%	
DM3(E) Requiring developments to be 'Tenure Blind'	1	2	3	1	0	7
	14%	29%	43%	14%	0%	
DM3(F) Require all affordable housing contributions to be made on site.	1	1	1	4	0	7
	14%	14%	14%	57%	0%	
DM3(G) In exceptional circumstance accepting off-site affordable housing, or payment-in-lieu.	1	6	0	0	0	7
	14%	86%	0%	0%	0%	



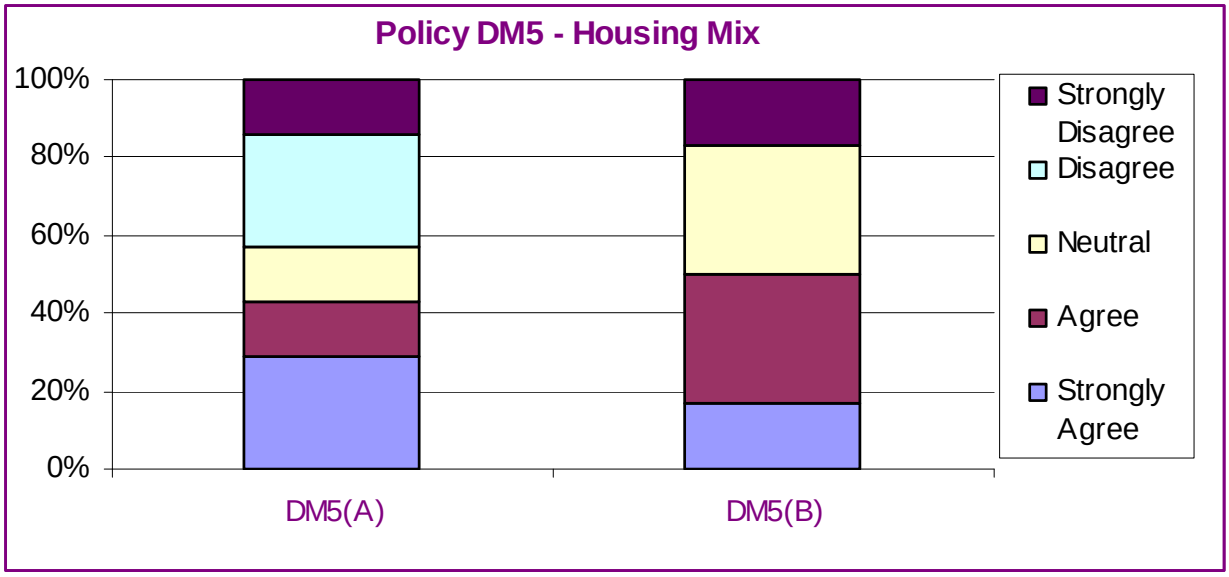
Policy DM4 - Residential Extensions and Alterations

Policy	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Total
DM4(A) Alterations and extensions should respect the architectural character of the original building.	2	2	1	0	0	5
	40%	40%	20%	0%	0%	
DM4(B) Retain and restore existing traditional features and materials.	1	1	2	0	0	4
	25%	25%	50%	0%	0%	
DM4(C) No unreasonable loss of privacy, outlook or sunlight/daylight as a result of the extension or alteration.	3	0	2	0	0	5
	60%	0%	40%	0%	0%	



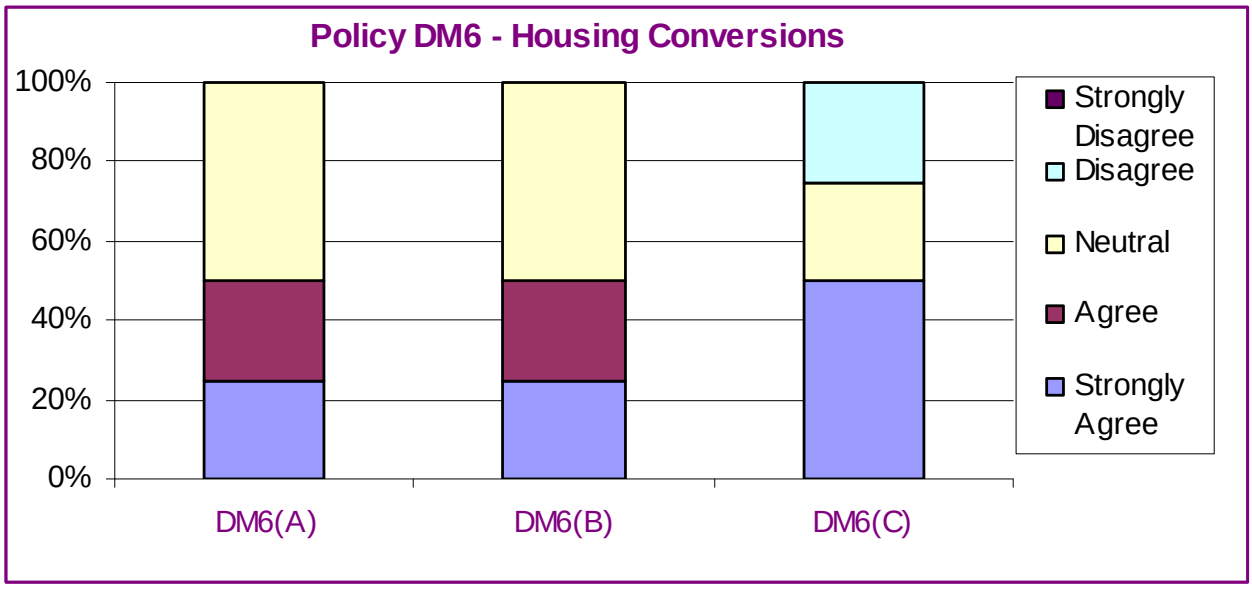
Policy DM5 - Housing Mix

Policy	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Total
DM5(A) All housing developments to provide a range of dwelling sizes and tenures	2	1	1	2	1	7
	29%	14%	14%	29%	14%	
DM5(B) Focusing on the provision of larger sized homes.	1	2	2	0	1	6
	17%	33%	33%	0%	17%	



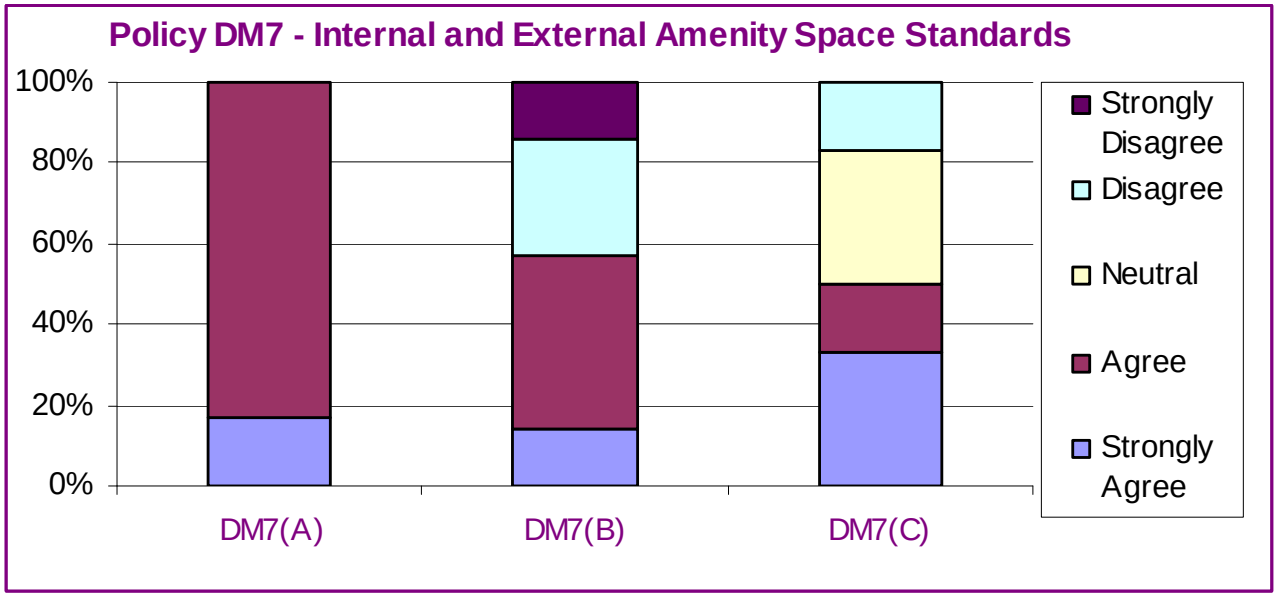
Policy DM6 - Housing Conversions

Policy	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Total
DM6(A) No dwelling conversion, if the criteria set in the plan not be met.	1	1	2	0	0	4
	25%	25%	50%	0%	0%	
DM6(B) Conversions of dwellings of more than 120 sq m will be subject to meeting criteria as set in the plan	1	1	2	0	0	4
	25%	25%	50%	0%	0%	
DM6(C) Resisting the conversion of larger homes to Buildings in Multiple Residential Occupation.	2	0	1	1	0	4
	50%	0%	25%	25%	0%	



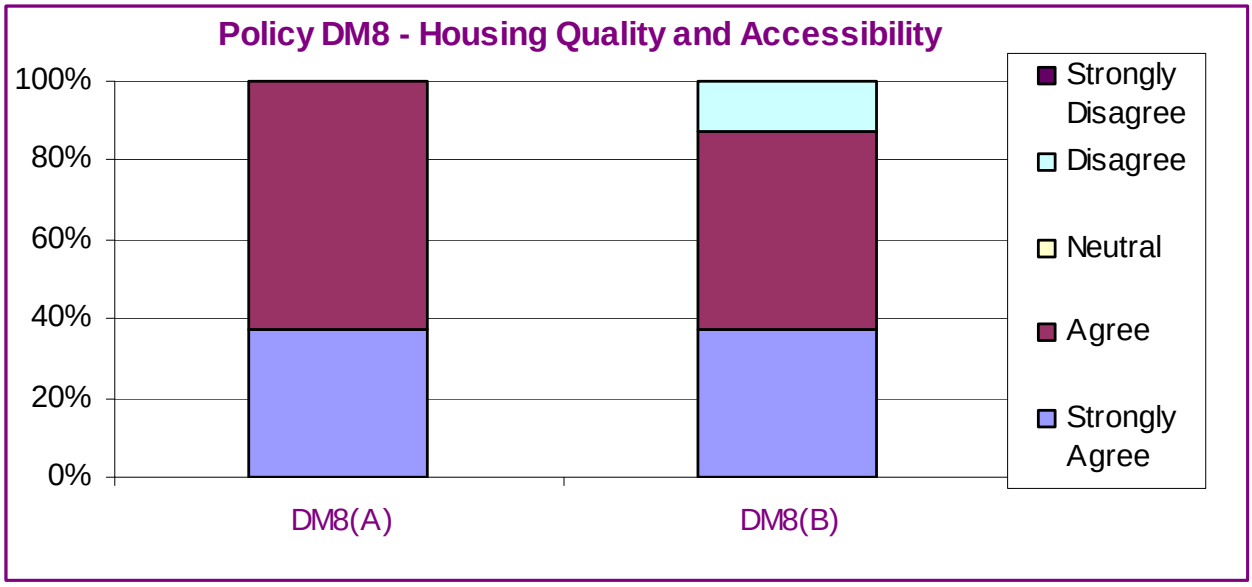
DM7 - Internal and External Amenity Space Standards

Policy	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Total
DM7(A) All new residential proposals to meet minimum space standards	1	5	0	0	0	6
	17%	83%	0%	0%	0%	
DM7(B) All new dwellings to provide 15 sqm per habitable room of private amenity space.	1	3	0	2	1	7
	14%	43%	0%	29%	14%	
DM7(C) Family housing to have a separate rear garden.	2	1	2	1	0	6
	33%	17%	33%	17%	0%	



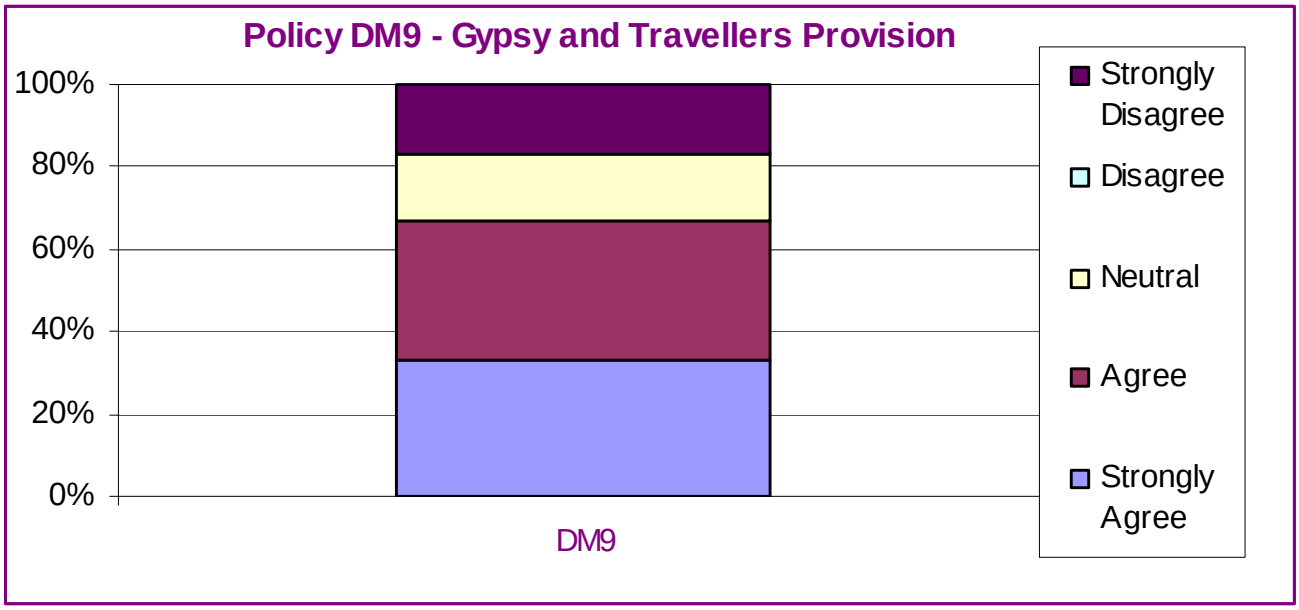
Policy DM8 - Housing Quality and Accessibility

Policy	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Total
DM8(A) all new housing development to be of a high quality of design and construction.	3	5	0	0	0	8
	38%	63%	0%	0%	0%	
DM8(B) Criteria for Housing Quality and Accessibility	3	4	0	1	0	8
	38%	50%	0%	13%	0%	



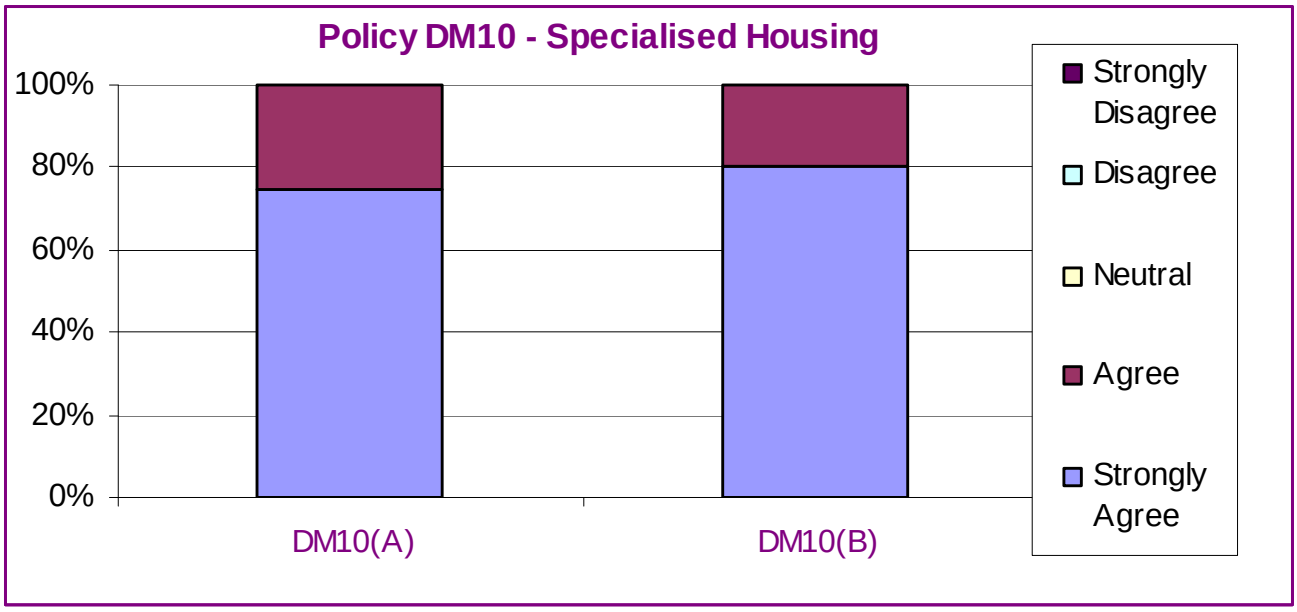
Policy DM9 - Gypsy and Travellers Provision

Policy	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Total
DM9 A new or extended gypsy and travellers site subject to the criteria set in the plan	2	2	1	0	1	6
	33%	33%	17%	0%	17%	



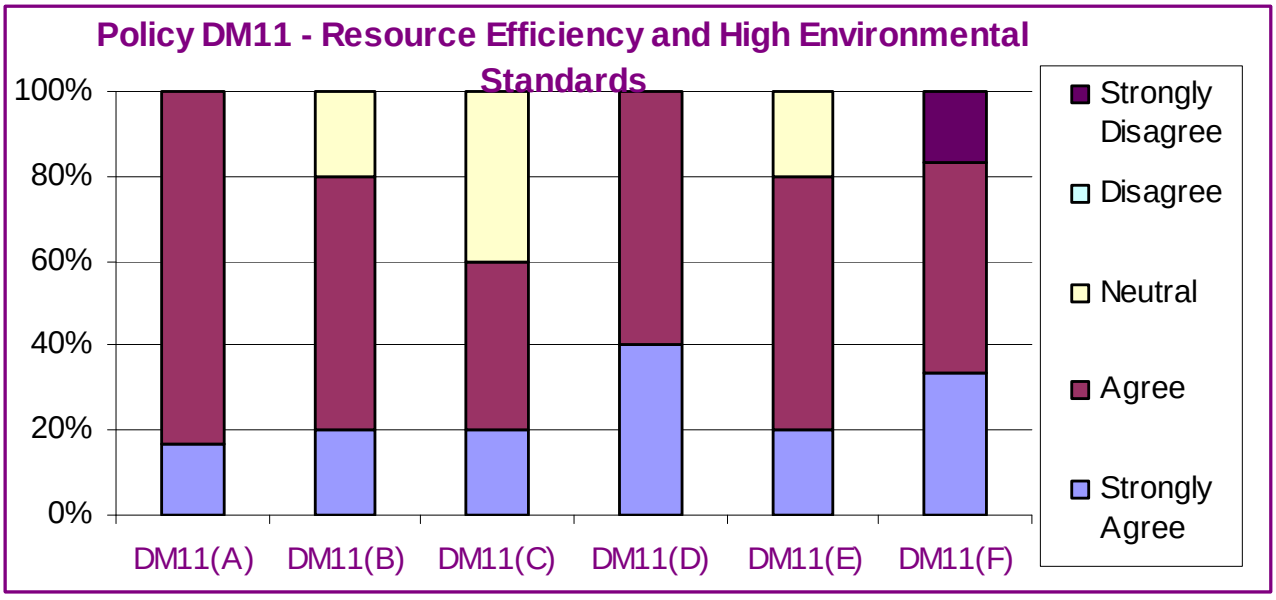
Policy DM10 - Specialised Housing

Policy	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Total
DM10(A) Supporting development of specialized housing	3	1	0	0	0	4
	75%	25%	0%	0%	0%	
DM10(B) Resisting the net loss of specialized housing	4	1	0	0	0	5
	80%	20%	0%	0%	0%	



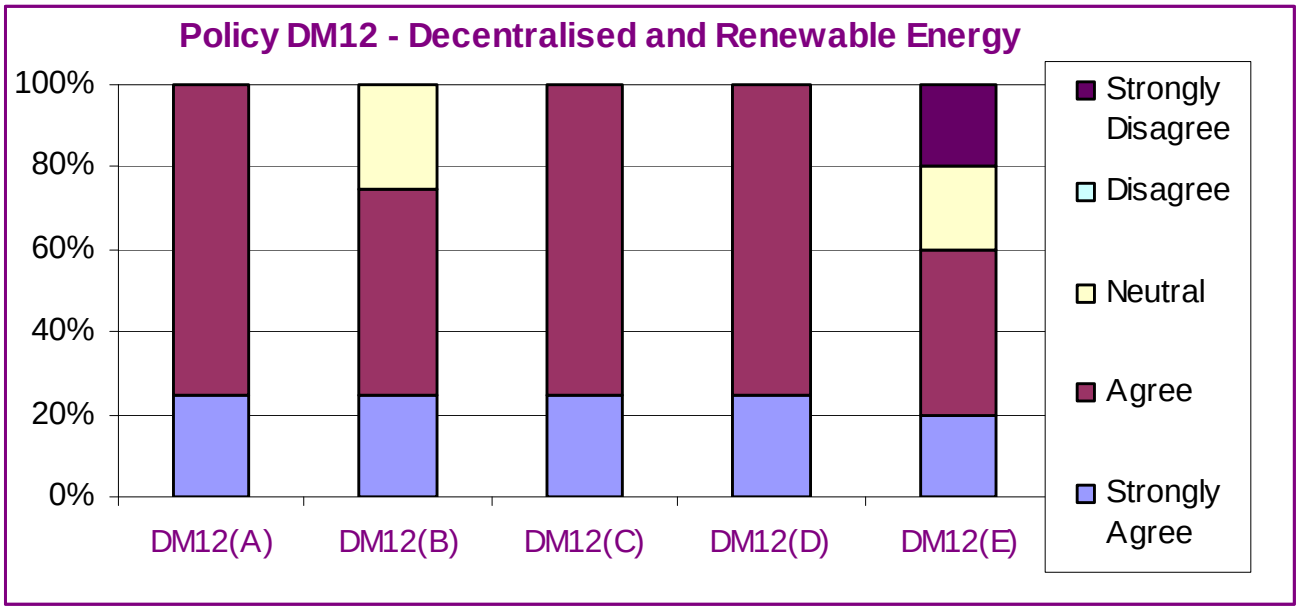
Policy DM11 - Resource Efficiency and High Environmental Standards

Policy	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Total
DM11(A) Sustainable development principles and zero carbon	1	5	0	0	0	6
	17%	83%	0%	0%	0%	
DM11(B) An Energy Assessment in support of planning application	1	3	1	0	0	5
	20%	60%	20%	0%	0%	
DM11(C) Financial contributions for carbon reductions on site cannot be achieved;	1	2	2	0	0	5
	20%	40%	40%	0%	0%	
DM11(D) Code Level 4 and BREEAM 'excellent' or equivalent standards for major developments;	2	3	0	0	0	5
	40%	60%	0%	0%	0%	
DM11(E) Minimisation, reuse and recycling of material from all stages of development	1	3	1	0	0	5
	20%	60%	20%	0%	0%	
DM11(F) High environmental standards through retrofitting, including Code for sustainable Homes and BREEAM standards	2	3	0	0	1	6
	33%	50%	0%	0%	17%	



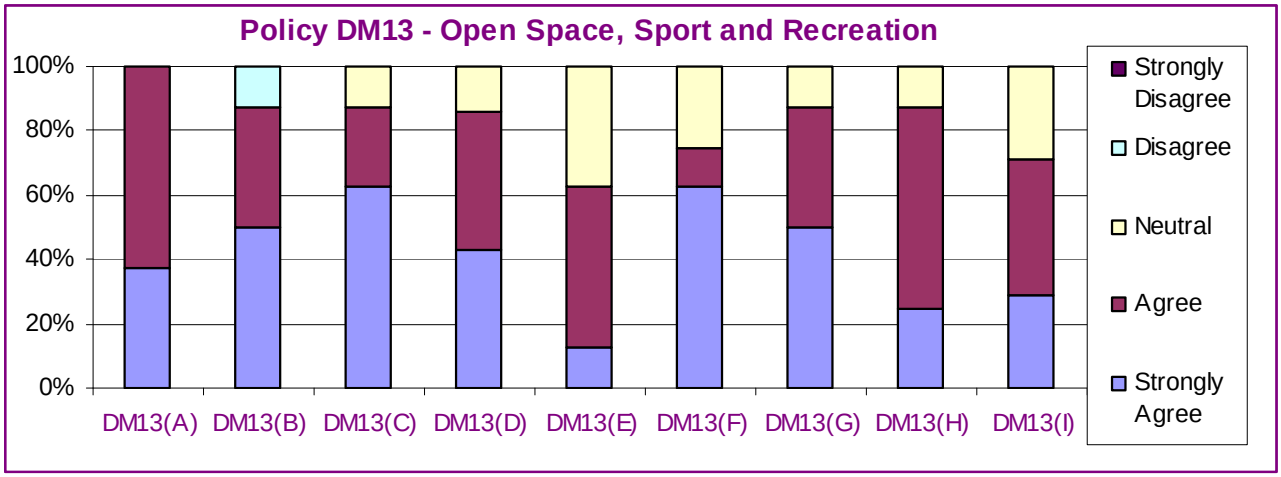
Policy DM12 - Decentralised and Renewable Energy

Policy	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Total
DM12(A) Reduction of carbon emissions in line with the London Plan targets;	1	3	0	0	0	4
	25%	75%	0%	0%	0%	
DM12(B) Assessment and implementation of decentralised heat and energy networks	1	2	1	0	0	4
	25%	50%	25%	0%	0%	
DM12(C) Developments to to make financial contribution towards either a future network or for other carbon reduction measures	1	3	0	0	0	4
	25%	75%	0%	0%	0%	
DM12(D) Carbon reduction from on-site renewable energy	1	3	0	0	0	4
	25%	75%	0%	0%	0%	
DM12(E) Financial contributions for off site carbon reduction measures	1	2	1	0	1	5
	20%	40%	20%	0%	20%	



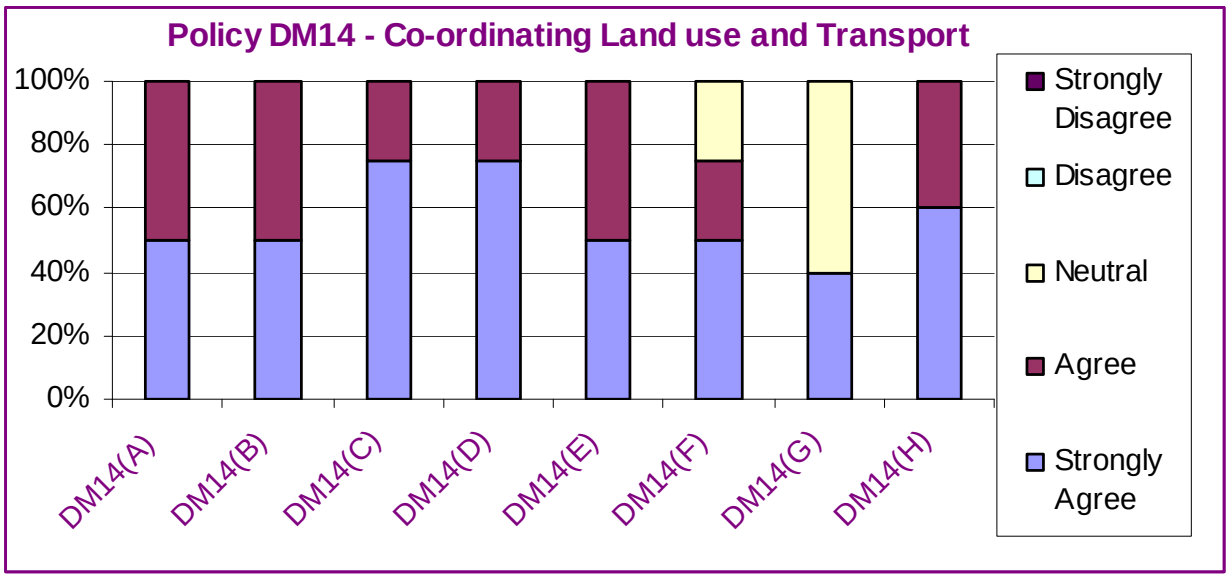
Policy DM13 - Open Space, Sport and Recreation

Policy	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Total
DM13(A) Developments within Green Belt and Metropolitan Open Land to implement a high standard of design and complement and improve the quality of the open space uses	3	5	0	0	0	8
	38%	63%	0%	0%	0%	
DM13(B) Developments must not adversely affect and where possible enhance the character, access and biodiversity value of open spaces.	4	3	0	1	0	8
	50%	38%	0%	13%	0%	
DM13(C) New usable open spaces and landscaping or financial contributions in areas of deficiency	5	2	1	0	0	8
	63%	25%	13%	0%	0%	
DM13(D) Requiring a maintenance plan for new areas of open space and landscaping.	3	3	1	0	0	7
	43%	43%	14%	0%	0%	
DM13(E)Intensification of space used to grow food and plants and a contribution to the supply, quality and accessibility of land used to grow food and plants	1	4	3	0	0	8
	13%	50%	38%	0%	0%	
DM13(F) Retaining all parks and only allowing development in parks and gardens where it is ancillary or complementary to the open space use	5	1	2	0	0	8
	63%	13%	25%	0%	0%	
DM13(G) No adverse impacts on amenity, ecological integrity or visitor enjoyment of the Lee Valley Regional Park; and delivering enhancements where possible.	4	3	1	0	0	8
	50%	38%	13%	0%	0%	
DM13(H) Developments to contribute to the provision of exercise and recreational facilities either on or off site where appropriate; and, submitting a maintenance plan.	2	5	1	0	0	8
	25%	63%	13%	0%	0%	
DM13(I) Providing play space.	2	3	2	0	0	7
	29%	43%	29%	0%	0%	



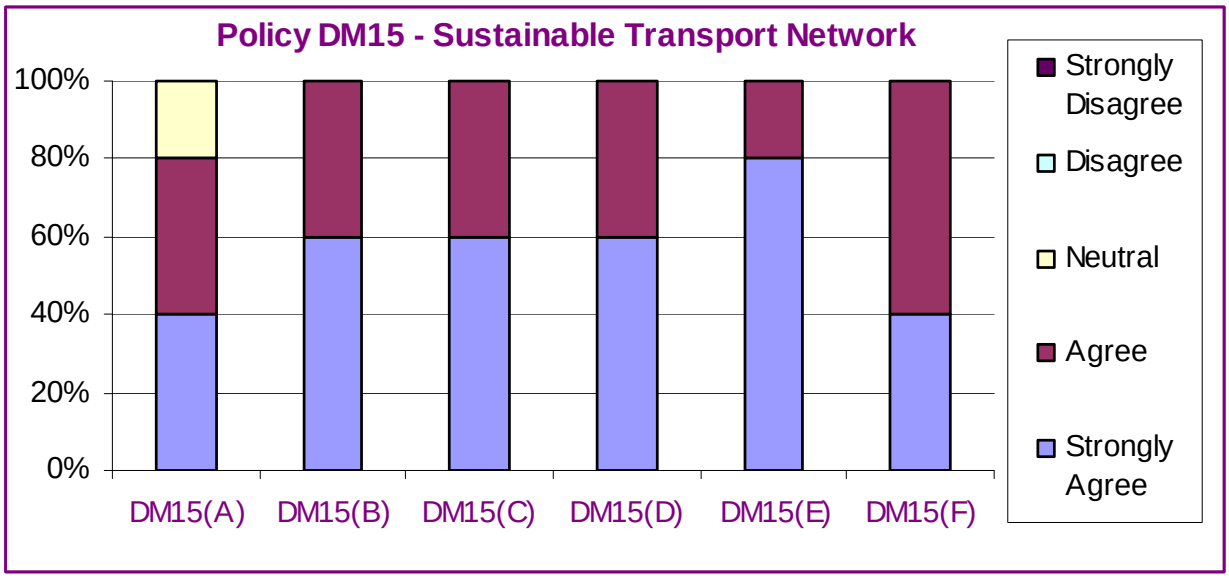
Policy DM14 - Co-ordinating Land use and Transport

Policy	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Total
DM14(A) Mixed-use developments and development in locations that minimise the need to travel;	2	2	0	0	0	4
	50%	50%	0%	0%	0%	
DM14(B) Assessing and addressing access and movement requirements to achieve good integration of new developments	2	2	0	0	0	4
	50%	50%	0%	0%	0%	
DM14(C) Ensuring sufficient transport capacity	3	1	0	0	0	4
	75%	25%	0%	0%	0%	
DM14(D) Assessment and mitigation of the impacts of new development on the transport networks	3	1	0	0	0	4
	75%	25%	0%	0%	0%	
DM14(E) Requiring travel plan to mitigate traffic impacts	2	2	0	0	0	4
	50%	50%	0%	0%	0%	
DM14(F) Requiring financial contributions to mitigate expected transport impacts and to improve access and movement by sustainable modes of transport.	2	1	1	0	0	4
	50%	25%	25%	0%	0%	
DM14(G) requiring transport assessment and travel plans to consider impacts on European sites	2	0	3	0	0	5
	40%	0%	60%	0%	0%	
DM14(H) no permission for any development within 200m of the Epping Forest SAC boundary if the criteria in plan can not be met.	3	2	0	0	0	5
	60%	40%	0%	0%	0%	



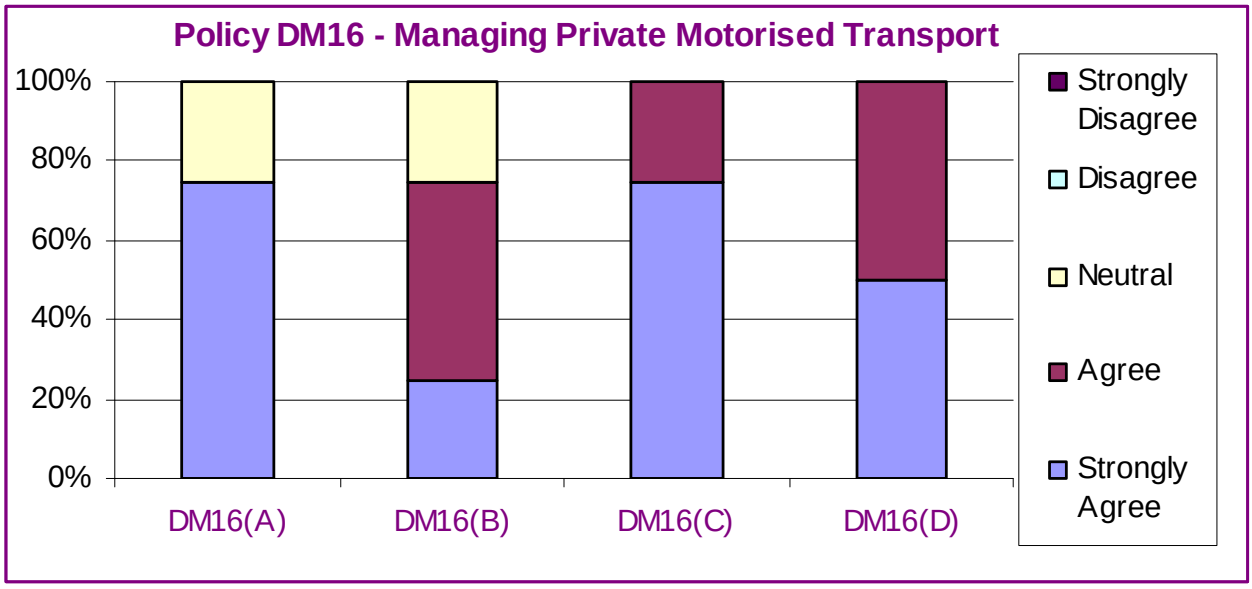
Policy DM15 - Sustainable Transport Network

Policy	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Total
DM15(A) New developments to optimise permeability and legibility and adequately balance the needs of the different modes	2	2	1	0	0	5
	40%	40%	20%	0%	0%	
DM15(B) New developments to provide convenient, accessible, safe and well designed walking and cycling routes and facilities	3	2	0	0	0	5
	60%	40%	0%	0%	0%	
DM15(C) Developments to contribute to an attractive and safe environment for pedestrians, cyclists, and the community	3	2	0	0	0	5
	60%	40%	0%	0%	0%	
DM15(D) Developments to provide features associated with pedestrian and cycle access	3	2	0	0	0	5
	60%	40%	0%	0%	0%	
DM15(E) Developments do not have a significant adverse impact on the walking and cycling environment	4	1	0	0	0	5
	80%	20%	0%	0%	0%	
DM15(F) Developments to contribute towards enhancing public transport access, infrastructure and connections	2	3	0	0	0	5
	40%	60%	0%	0%	0%	



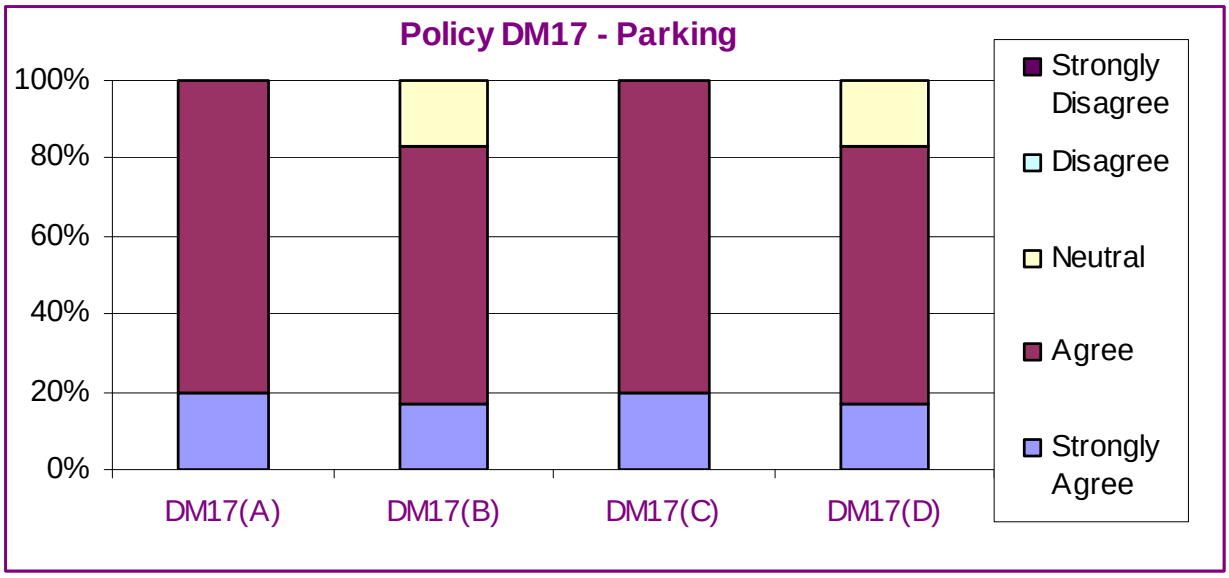
Policy DM16 - Managing Private Motorised Transport

Policy	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Total
DM16(A) New roads, footways, cycleways and other access routes to meet adoption standards	3	0	1	0	0	4
	75%	0%	25%	0%	0%	
DM16(B) Most appropriate type of road is used for different trip purposes in accordance with Waltham Forest's road hierarchy	1	2	1	0	0	4
	25%	50%	25%	0%	0%	
DM16(C) Road safety, in particular for vulnerable road users	3	1	0	0	0	4
	75%	25%	0%	0%	0%	
DM16(D) Contribute towards a high quality public realm, which adequately balances the various requirements	2	2	0	0	0	4
	50%	50%	0%	0%	0%	



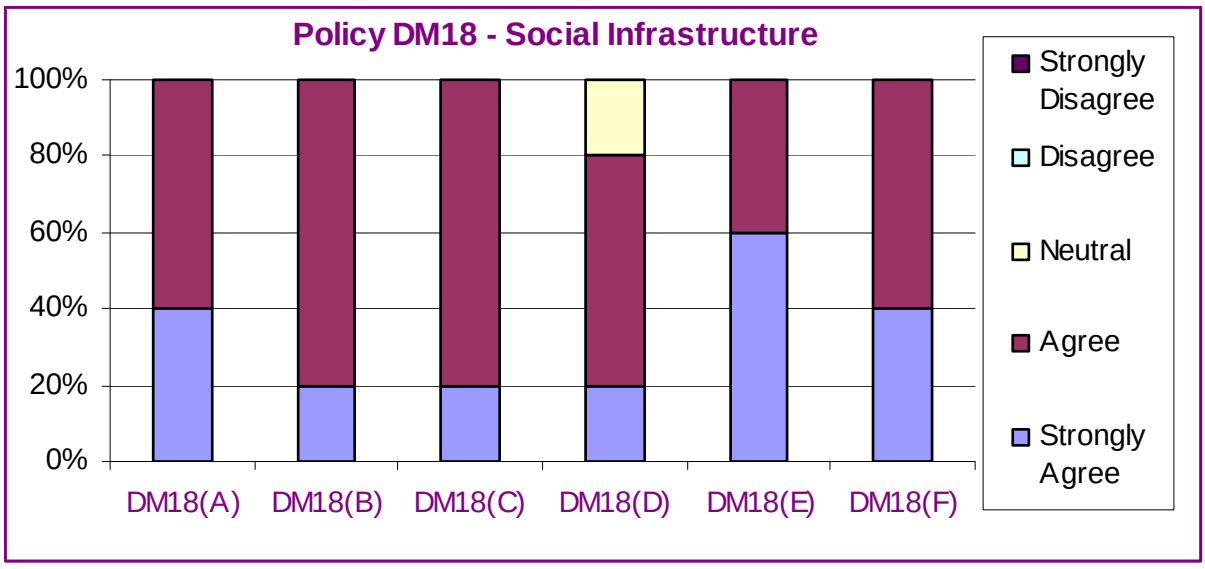
Policy DM17 - Parking

Policy	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Total
DM17(A) Provision of high quality parking facilities in accordance with the Council's parking standards;	1	4	0	0	0	5
	20%	80%	0%	0%	0%	
DM17(B) Car-free and car-capped developments accessible locations	1	4	1	0	0	6
	17%	67%	17%	0%	0%	
DM17(C) Off-street parking to incorporate safety and security measures, to minimise land take and to minimise the urban heat island effect	1	4	0	0	0	5
	20%	80%	0%	0%	0%	
DM17(D) Allocation of spaces for more environmentally friendly vehicles and requirement for 1 in 5 parking spaces to provide an electrical charging point	1	4	1	0	0	6
	17%	67%	17%	0%	0%	



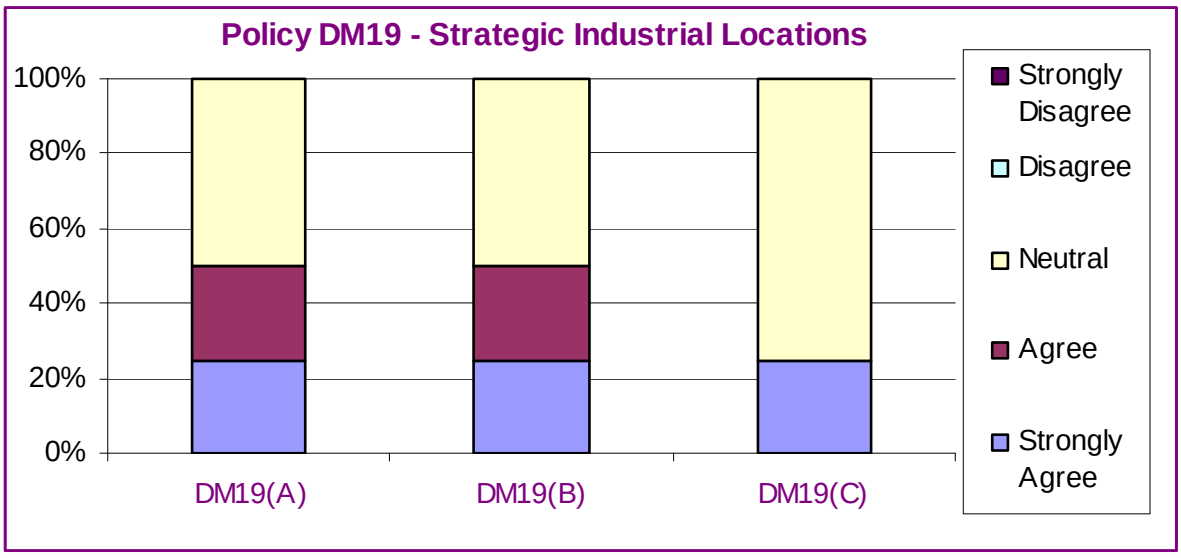
Policy DM18 - Social Infrastructure

Policy	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Total
DM18((A) Resisting the loss of social infrastructure	2	3	0	0	0	5
	40%	60%	0%	0%	0%	
DM18((B) Meeting increase demand for infrastructure	1	4	0	0	0	5
	20%	80%	0%	0%	0%	
DM18((C) New social infrastructure uses must be close or accessible to the community,	1	4	0	0	0	5
	20%	80%	0%	0%	0%	
DM18((D) New educational facilities to meet the Education Authority's standards.	1	3	1	0	0	5
	20%	60%	20%	0%	0%	
DM18((E) Protect existing leisure and cultural facilities	3	2	0	0	0	5
	60%	40%	0%	0%	0%	
DM18((F) Provision of health services	2	3	0	0	0	5
	40%	60%	0%	0%	0%	



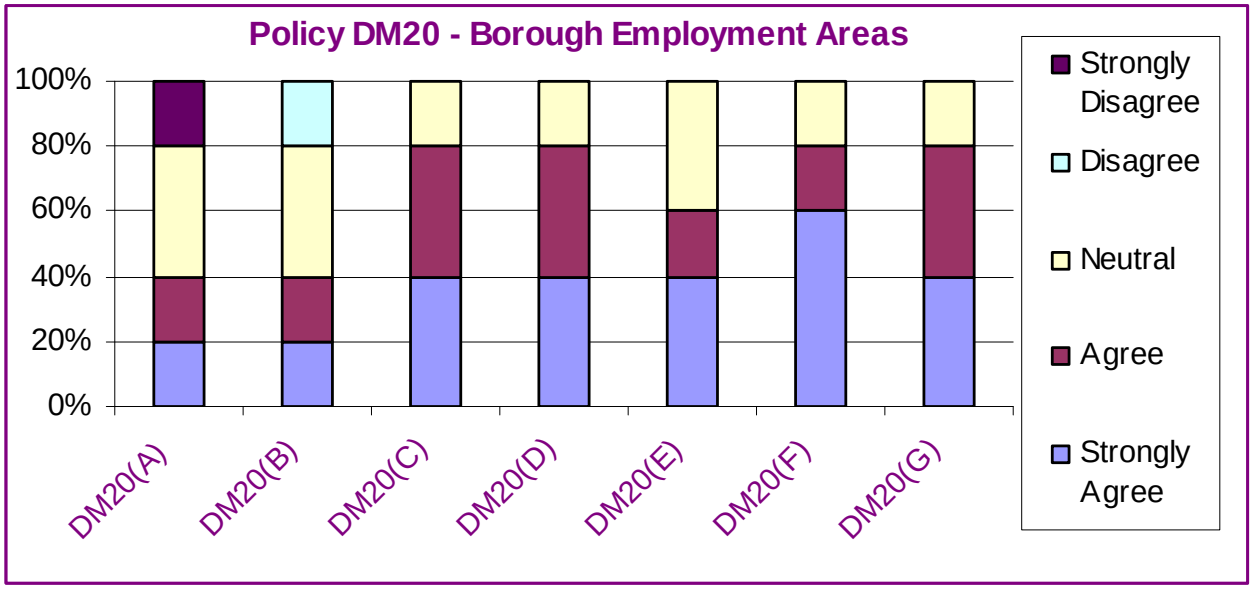
Policy DM19 - Strategic Industrial Locations

Policy	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Total
DM19(A) B2 and B8 being the main uses in SIL	1	1	2	0	0	4
	25%	25%	50%	0%	0%	
DM19(B) Allowing some ancillary catering facilities in SIL	1	1	2	0	0	4
	25%	25%	50%	0%	0%	
DM19(C) Resisting loss of SIL to all other uses	1	0	3	0	0	4
	25%	0%	75%	0%	0%	



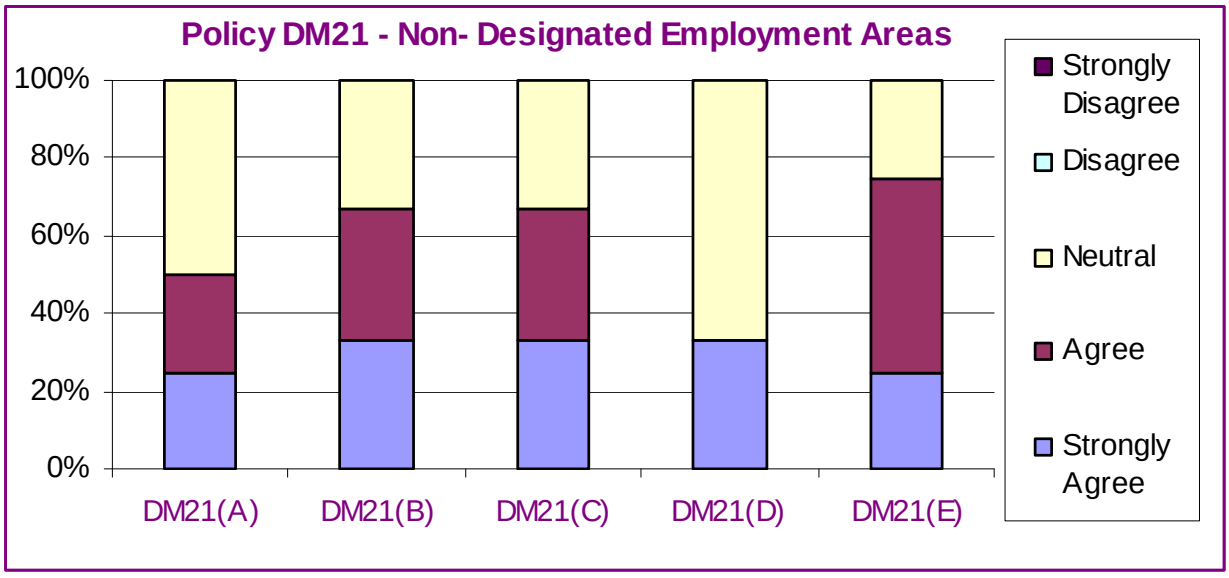
Policy DM20 - Borough Employment Areas

Policy	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Total
DM20(A) B1 and B8 being the main uses in Borough Employment Areas	1	1	2	0	1	5
	20%	20%	40%	0%	20%	
DM20(B) Allowing some small scale B2 use in Borough Employment Areas	1	1	2	1	0	5
	20%	20%	40%	20%	0%	
DM20(C) Allowing ancillary nurseries and catering facilities in Borough Employment Areas	2	2	1	0	0	5
	40%	40%	20%	0%	0%	
DM20(D) Taking a more flexible approach that allows for mixed use, with key growth areas	2	2	1	0	0	5
	40%	40%	20%	0%	0%	
DM20(E) Allowing new office development in identified areas outside of Walthamstow town centre	2	1	2	0	0	5
	40%	20%	40%	0%	0%	
DM20(F) Supporting provision of small units for start up businesses	3	1	1	0	0	5
	60%	20%	20%	0%	0%	
DM20(G) Allowing for the intensification of existing employment areas	2	2	1	0	0	5
	40%	40%	20%	0%	0%	



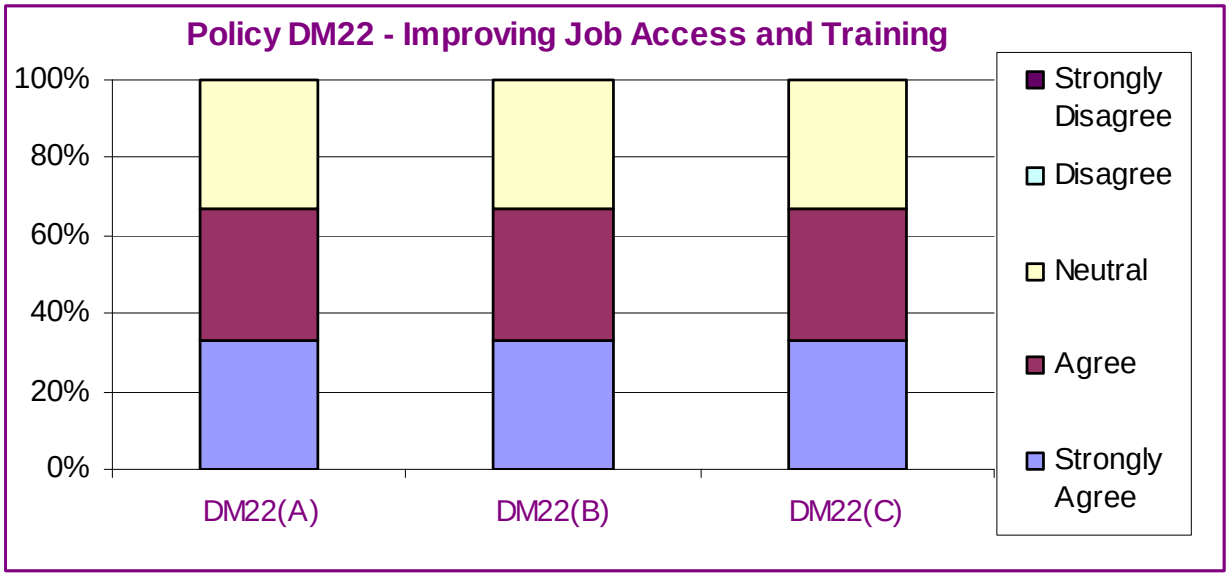
Policy DM21 - Non- Designated Employment Areas

Policy	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Total
DM21(A) Requiring sites to be clearly demonstrated as no longer fit for employment purposes before allowing other uses	1	1	2	0	0	4
	25%	25%	50%	0%	0%	
DM21(B) Requiring mitigation where any land is lost from employment use	1	1	1	0	0	3
	33%	33%	33%	0%	0%	
DM21(C) Incorporating a preference towards schemes that incorporate social infrastructure	1	1	1	0	0	3
	33%	33%	33%	0%	0%	
DM21(D) Supporting live/ work schemes	1	0	2	0	0	3
	33%	0%	67%	0%	0%	
DM21(E) Supporting new units for creative industries within the boroughs railway arches	1	2	1	0	0	4
	25%	50%	25%	0%	0%	



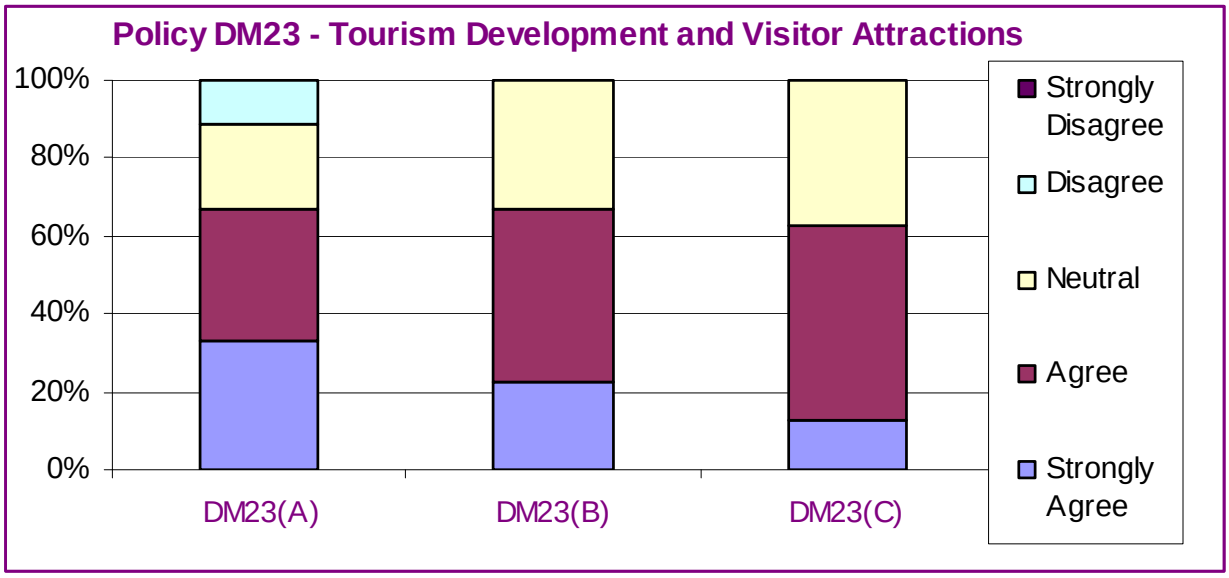
Policy DM22 - Improving Job Access and Training

Policy	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Total
DM22(A) Allowing for some new education and training facilities on Borough Employment Areas and Non Designated Employment Areas	1	1	1	0	0	3
	33%	33%	33%	0%	0%	
DM22(B) Securing funds towards training and recruitment of local residents	1	1	1	0	0	3
	33%	33%	33%	0%	0%	
DM22(C) Ensuring new jobs are accessible by a range of means	1	1	1	0	0	3
	33%	33%	33%	0%	0%	



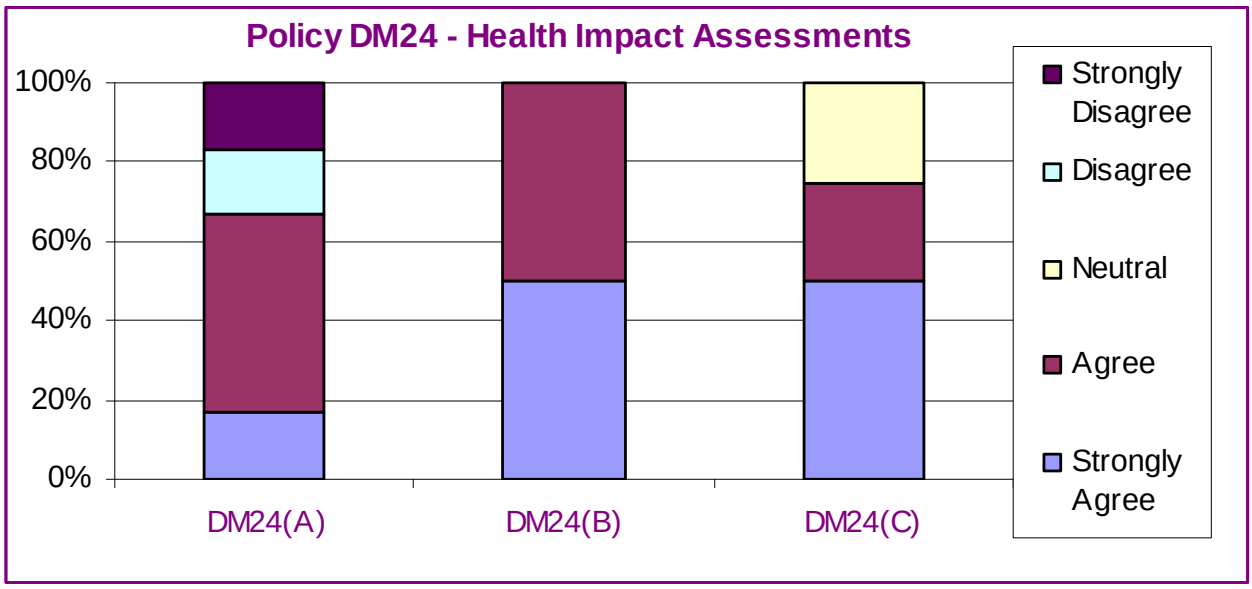
Policy DM23 - Tourism Development and Visitor Attractions

Policy	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Total
DM23(A) Focussing major new tourist developments towards existing centres, particularly Walthamstow town centre	3	3	2	1	0	9
	33%	33%	22%	11%	0%	
DM23(B) Allowing for some developments outside of centres to encourage better use of existing open spaces and assets	2	4	3	0	0	9
	22%	44%	33%	0%	0%	
DM23(C) Seeking to enhance the role of Walthamstow Market as a unique feature of the town centre	1	4	3	0	0	8
	13%	50%	38%	0%	0%	



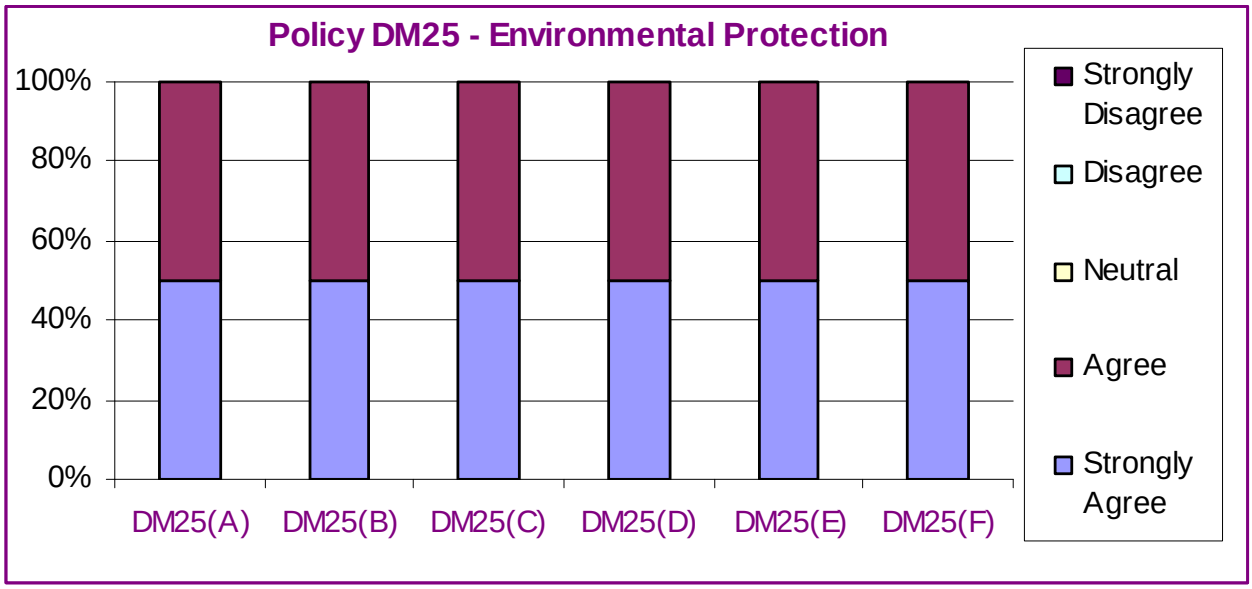
Policy DM24 - Health Impact Assessments

Policy	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Total
DM24(A) requiring major developments to submit a Health Impact Assessment	1	3	0	1	1	6
	17%	50%	0%	17%	17%	
DM24(B) Ensuring new development promotes everyday exercise.	2	2	0	0	0	4
	50%	50%	0%	0%	0%	
DM24(C) Resisting proposals for Hot Food Takeaways (A5)	2	1	1	0	0	4
	50%	25%	25%	0%	0%	



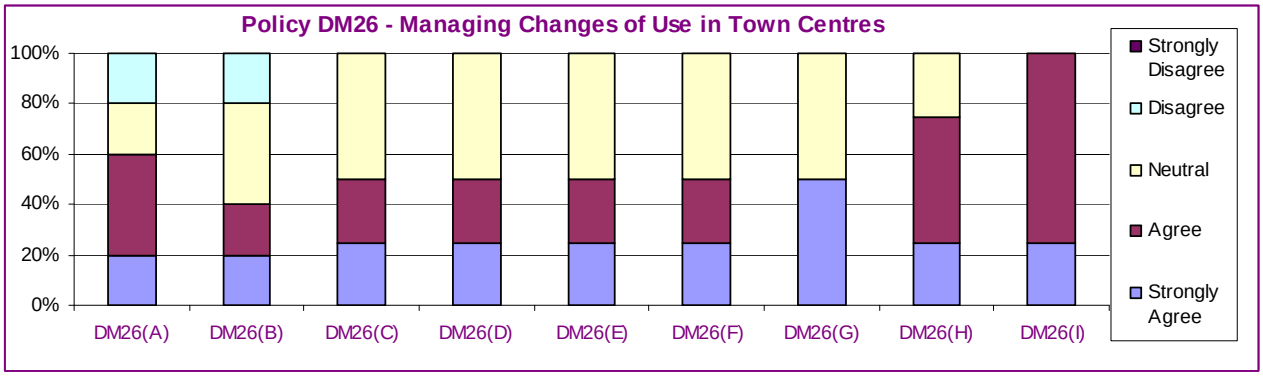
Policy DM25 - Environmental Protection

Policy	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Total
DM25(A) Requiring site investigations and remediation of land suspected to be contaminated	2	2	0	0	0	4
	50%	50%	0%	0%	0%	
DM25(B) Resisting developments likely to be affected by hazardous substances	2	2	0	0	0	4
	50%	50%	0%	0%	0%	
DM25(C) Preventing developments from contributing to or suffering from high levels of air pollution	2	2	0	0	0	4
	50%	50%	0%	0%	0%	
DM25(D) Preventing developments from contributing to or suffering from high levels of noise pollution or vibration	2	2	0	0	0	4
	50%	50%	0%	0%	0%	
DM25(E) Requiring new developments to avoid a high level of light pollution	2	2	0	0	0	4
	50%	50%	0%	0%	0%	
DM25(F) Protecting water quality from insensitive new developments	2	2	0	0	0	4
	50%	50%	0%	0%	0%	



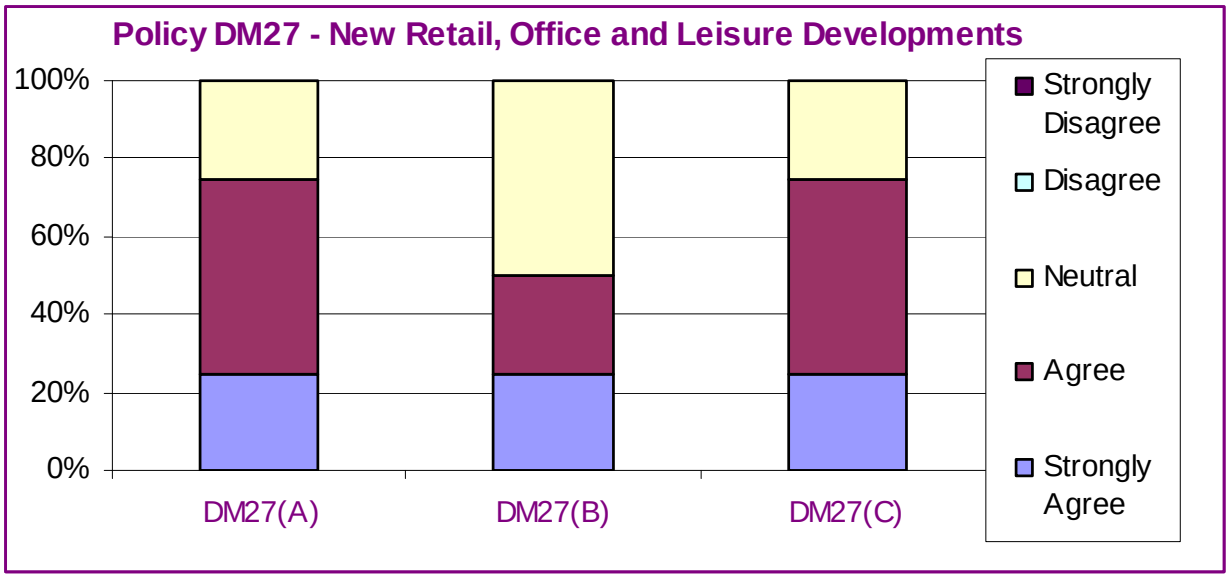
Policy DM26 - Managing Changes of Use in Town Centres

Policy	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Total
DM26(A) In Primary Shopping Frontages, retail uses (use class A1) predominate on ground floors. Other uses will be subject to the criteria set in the plan	1	2	1	1	0	5
	20%	40%	20%	20%	0%	
DM26(B) In Secondary Shopping Frontages, maintain/encourage retail uses (use class A1) at ground floors. Other uses will be subject floor subject to the criteria set in the plan	1	1	2	1	0	5
	20%	20%	40%	20%	0%	
DM26(C) Within Neighbourhood Centres, the Council will only grant permission for changes of use from shops (use class A1) outside the designated retail parades.	1	1	2	0	0	4
	25%	25%	50%	0%	0%	
DM26(D) In Local Retail Parades, changes of retail uses (use class A1) at ground floors will be subject to the criteria set in the plan	1	1	2	0	0	4
	25%	25%	50%	0%	0%	
DM26(E) Non designated frontages or parades in the designated town/district centres, changes of retail uses (class A1) to any other use subject to amenity and townscape considerations	1	1	2	0	0	4
	25%	25%	50%	0%	0%	
DM26(F) Outside Designated Centres and Local Retail Parades, the Council will generally permit changes of use at ground floors from shops (use class A1)	1	1	2	0	0	4
	25%	25%	50%	0%	0%	
DM26(G) Hot Food Take-Aways subject to the criteria set in the plan	2	0	2	0	0	4
	50%	0%	50%	0%	0%	
DM26(H) For Townscape Character, consider the impact of the proposals on amenity, the character and function of the relevant parade.	1	2	1	0	0	4
	25%	50%	25%	0%	0%	
DM26(I) Shopfronts and signs will be subject to the criteria set in the plan	1	3	0	0	0	4
	25%	75%	0%	0%	0%	



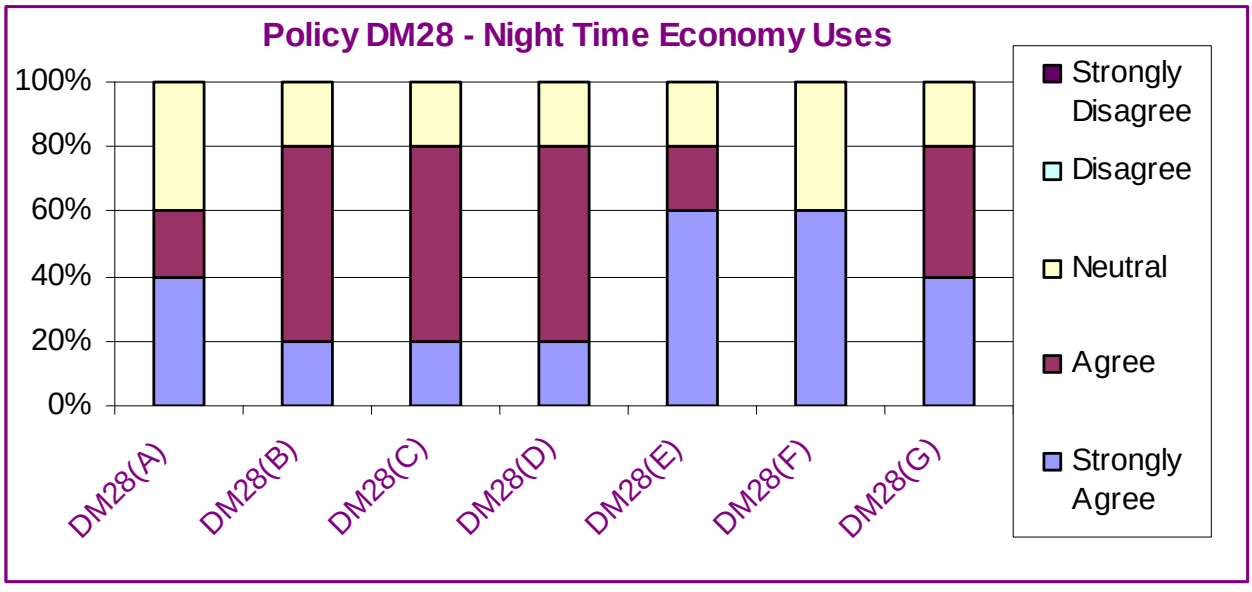
Policy DM27 - New Retail, Office and Leisure Developments

Policy	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Total
DM27(A) Proposals are concentrated within the designated centres and parades subject to an appropriate scale to the role and character of the centre/parade and its catchment;	1	2	1	0	0	4
	25%	50%	25%	0%	0%	
DM27(B) Out-of-centre proposals will be considered in accordance with Planning Policy Statement 4	1	1	2	0	0	4
	25%	25%	50%	0%	0%	
DM27(C) No permission for outdoor markets/car boot sales outside the designated centres. Proposals within existing centres subject to no adverse environmental problems and no adverse impact on the existing market in Walthamstow Town Centre.	1	2	1	0	0	4
	25%	50%	25%	0%	0%	



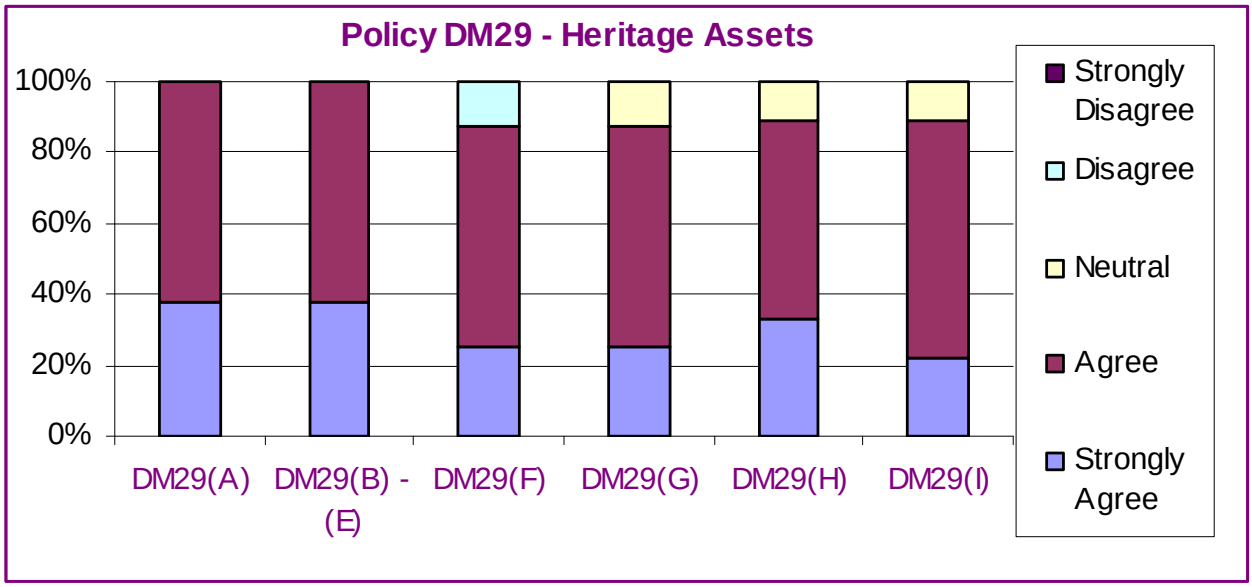
Policy DM28 - Night Time Economy Uses

Policy	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Total
DM28(A) They are part of a strategy to create cultural quarters in a town centre or support the creation of a balanced provision of evening/night-time uses.	2	1	2	0	0	5
	40%	20%	40%	0%	0%	
DM28(B) The design of the development focuses on public safety, crime prevention and anti-social behaviour.	1	3	1	0	0	5
	20%	60%	20%	0%	0%	
DM28(C) No adverse effect on the surrounding residential amenity due to noise, traffic, parking, disturbance, disorder and nuisance.	1	3	1	0	0	5
	20%	60%	20%	0%	0%	
DM28(D) Arrangements for mitigating pollution including ventilation equipment, refuse disposal, grease traps and noise insulation.	1	3	1	0	0	5
	20%	60%	20%	0%	0%	
DM28(E) Provision of access for people of all ages and abilities.	3	1	1	0	0	5
	60%	20%	20%	0%	0%	
DM28(F) Adequate parking and public transit available during operation hours.	3	0	2	0	0	5
	60%	0%	40%	0%	0%	
DM28(G) The day-time use does not detract from the character/amenity of the surrounding shops/services (i.e. no blank frontage due to closure during the day).	2	2	1	0	0	5
	40%	40%	20%	0%	0%	



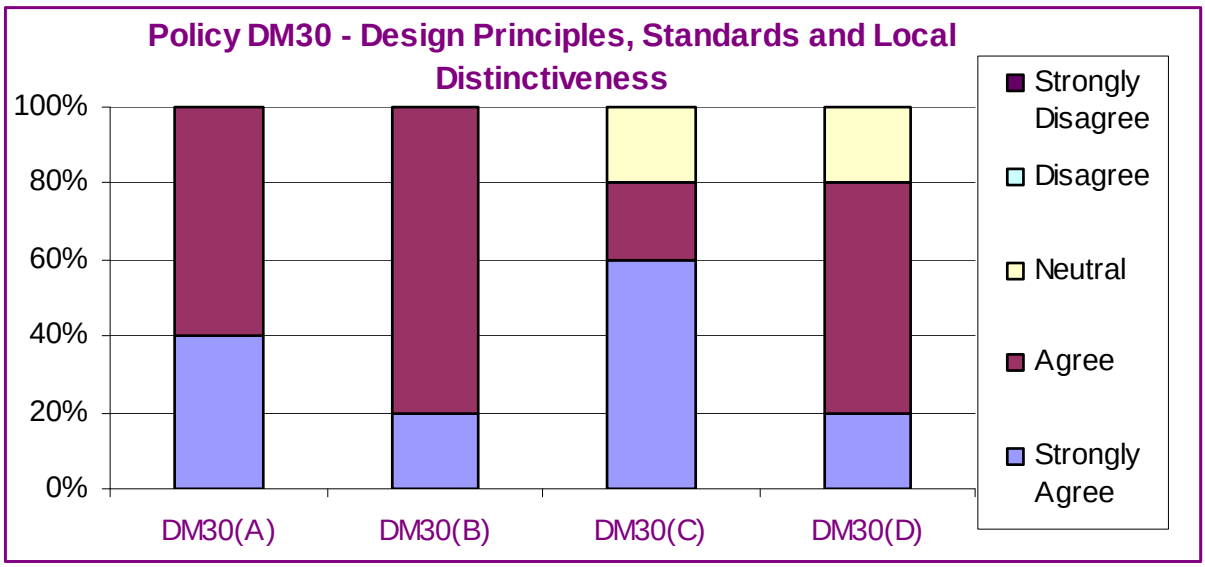
Policy DM29 - Heritage Assets

Policy	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Total
DM29(A) Conservation Areas - developments subject to the criteria set in the plan	3	5	0	0	0	8
	38%	63%	0%	0%	0%	
DM29 (B) - (E) for -Statutorily Listed Buildings subject to the criteria set in the plan	3	5	0	0	0	8
	38%	63%	0%	0%	0%	
DM29(F) Locally Listed Buildings - developments subject to the criteria set in the plan	2	5	0	1	0	8
	25%	63%	0%	13%	0%	
DM29(G) Buildings of Importance to the Character of Walthamstow Town Centre - the essential character of the buildings is maintained and enhanced by the proposals	2	5	1	0	0	8
	25%	63%	13%	0%	0%	
DM29(H) Archaeological Heritage subject to the criteria set in the plan	3	5	1	0	0	9
	33%	56%	11%	0%	0%	
DM29(I) Improvement Schemes - The Council will work with owners/partners to restore buildings, spaces and areas.	2	6	1	0	0	9
	22%	67%	11%	0%	0%	



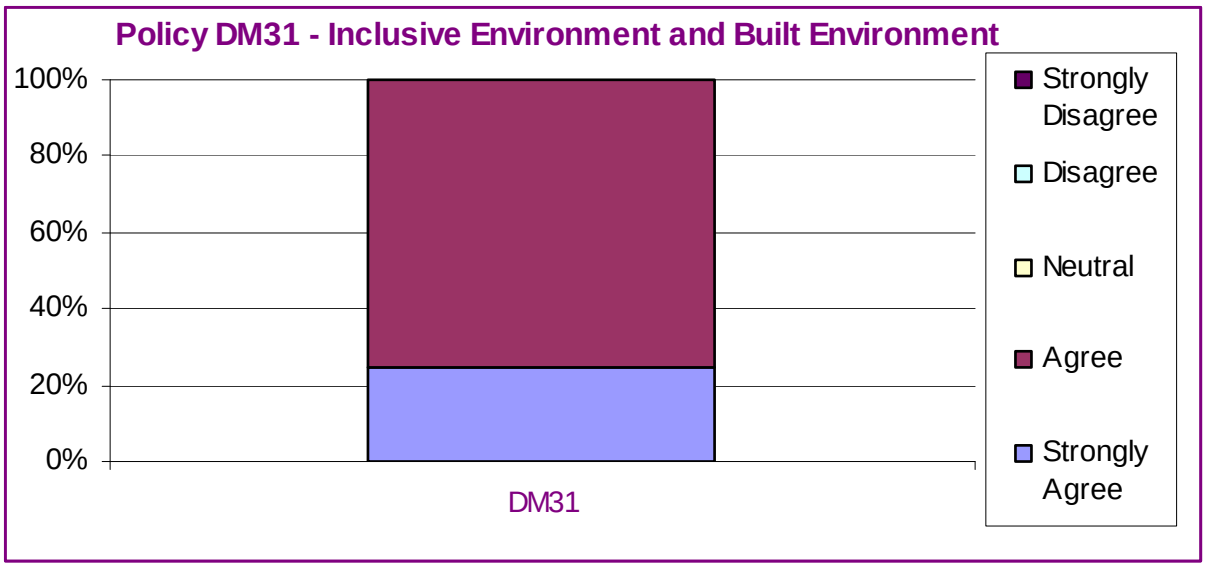
Policy DM30 - Design Principles, Standards and Local Distinctiveness

Policy	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Total
DM30(A) A high standard of urban and architectural design for all new development	2	3	0	0	0	5
	40%	60%	0%	0%	0%	
DM30(B) New development proposals will be expected to provide appropriate facilities for the benefit of occupiers and visitors.	1	4	0	0	0	5
	20%	80%	0%	0%	0%	
DM30(C) No consent for advertisements which are detrimental to the appearance of the building, visual amenity and a hazard to public safety.	3	1	1	0	0	5
	60%	20%	20%	0%	0%	
DM30(D) Impose control within areas of special control of advertisements (to be identified)	1	3	1	0	0	5
	20%	60%	20%	0%	0%	



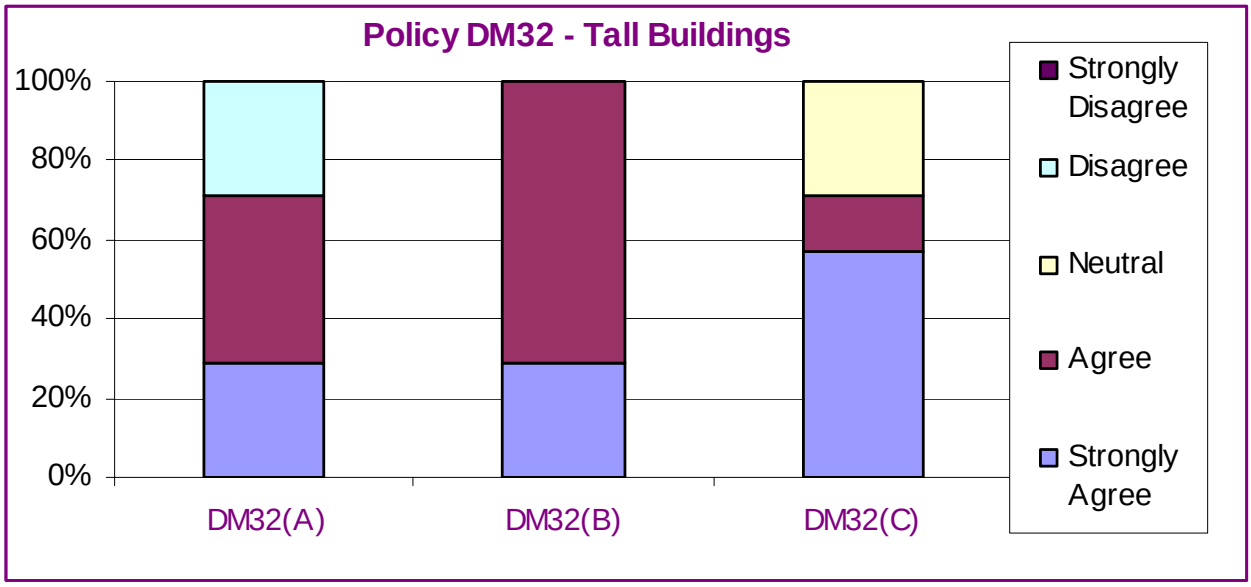
Policy DM31 - Inclusive Environment and Built Environment

Policy	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Total
DM31 Inclusive design principles by commending guidelines to developers for new development	1	3	0	0	0	4
	25%	75%	0%	0%	0%	



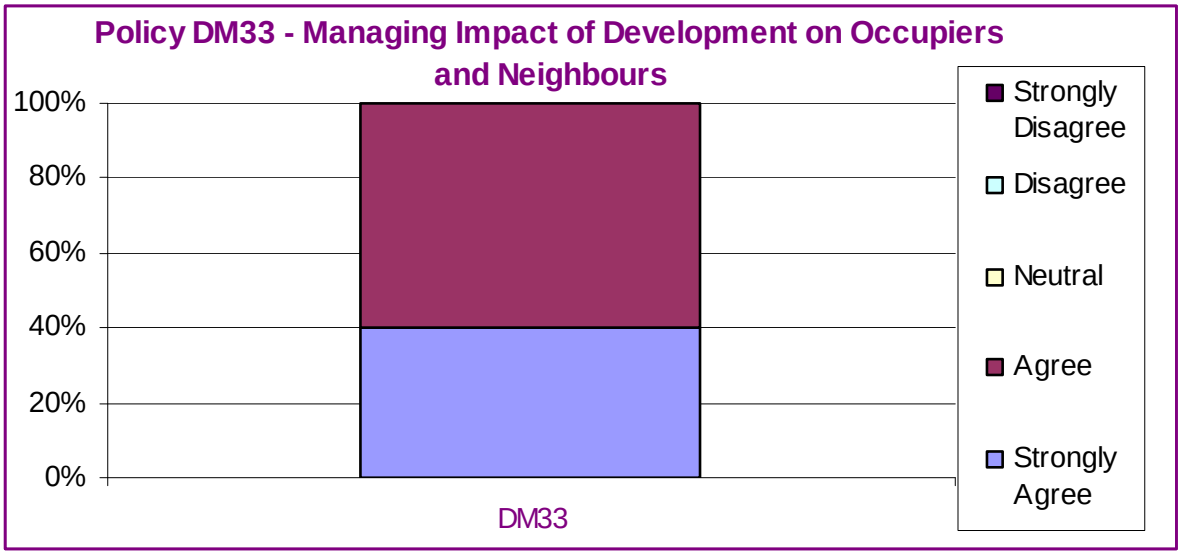
Policy DM32 - Tall Buildings

Policy	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Total
DM32(A) Tall buildings will not normally be appropriate in the Borough. However, tall buildings may be acceptable in limited locations	2	3	0	2	0	7
	29%	43%	0%	29%	0%	
DM32(B) proposals will be considered subject to: quality of design, architecture, construction and materials, and impacts	2	5	0	0	0	7
	29%	71%	0%	0%	0%	
DM32(C) Developers should take into account the CABE/ English Heritage Guidance on Tall Buildings	4	1	2	0	0	7
	57%	14%	29%	0%	0%	



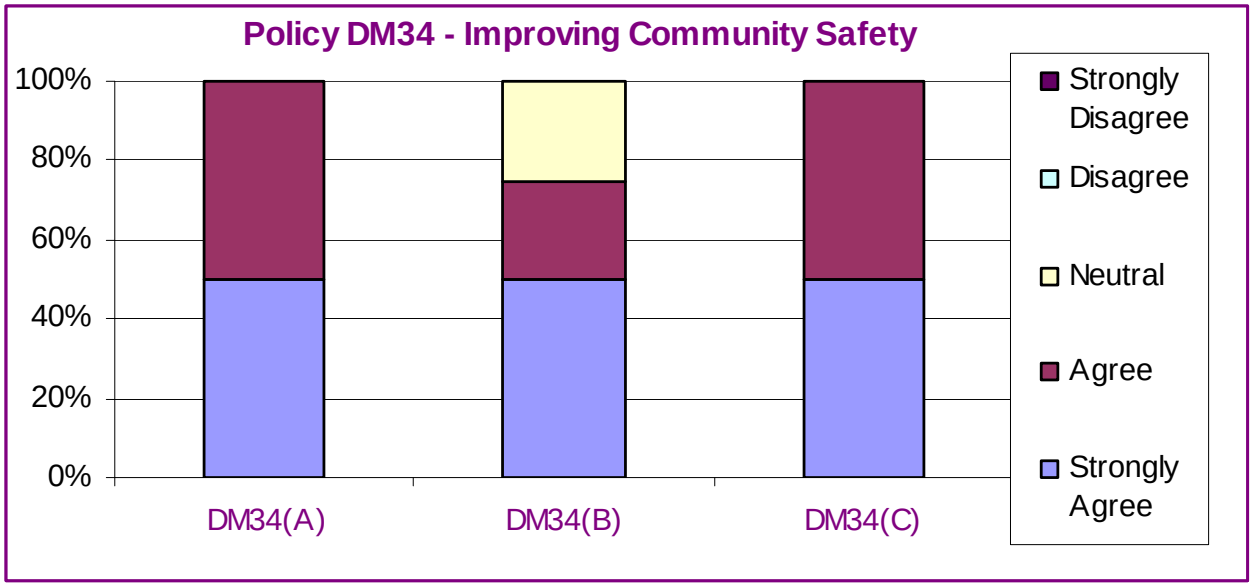
Policy DM33 - Managing Impact of Development on Occupiers and Neighbours

Policy	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Total
DM33 Impact of new development on neighbouring amenity	2	3	0	0	0	5
	40%	60%	0%	0%	0%	



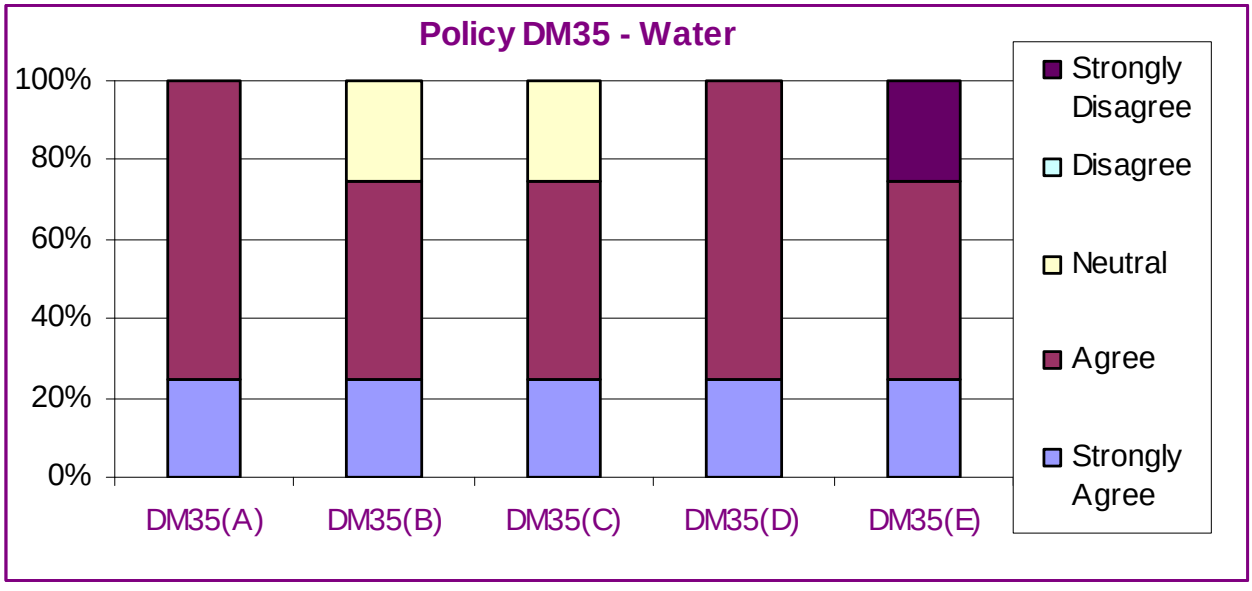
Policy DM34 - Improving Community Safety

Policy	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Total
DM34(A) Requiring new developments to adopt the principles of designing out crime	2	2	0	0	0	4
	50%	50%	0%	0%	0%	
DM34(B) Restricting growth in uses that are understood to increase the likelihood of criminal or antisocial behaviour	2	1	1	0	0	4
	50%	25%	25%	0%	0%	
DM34(C) Enabling development of a network of safe walking and cycling routes	2	2	0	0	0	4
	50%	50%	0%	0%	0%	



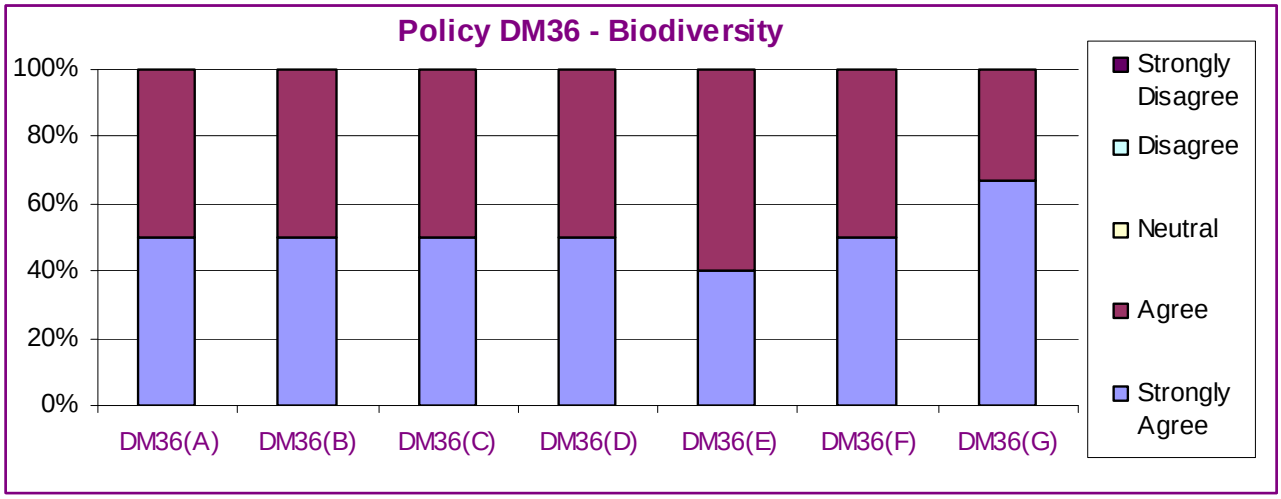
Policy DM35 – Water

Policy	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Total
DM35(A) Protecting water and sewerage infrastructure	1	3	0	0	0	4
	25%	75%	0%	0%	0%	
DM35(B) Expecting separate foul sewer and surface water drains for all developments of 10+ dwellings or 1000sqm of floorspace.	1	2	1	0	0	4
	25%	50%	25%	0%	0%	
DM35(C) Normally permitting the development/expansion of water supply or waste water facilities, provided that the need for such facilities outweighs any adverse land use or environmental impact	1	2	1	0	0	4
	25%	50%	25%	0%	0%	
DM35(D) Development proposals should implement water efficiency measures	1	3	0	0	0	4
	25%	75%	0%	0%	0%	
DM35(E) Managing flood risk by: submitting a site specific flood risk assessment/ drainage strategy	1	2	0	0	1	4
	25%	50%	0%	0%	25%	
DM35(F) Development proposals affecting waterways to show no adverse impacts on the water environment and incorporate enhancement measures	1	4	0	0	1	6
	17%	67%	0%	0%	17%	



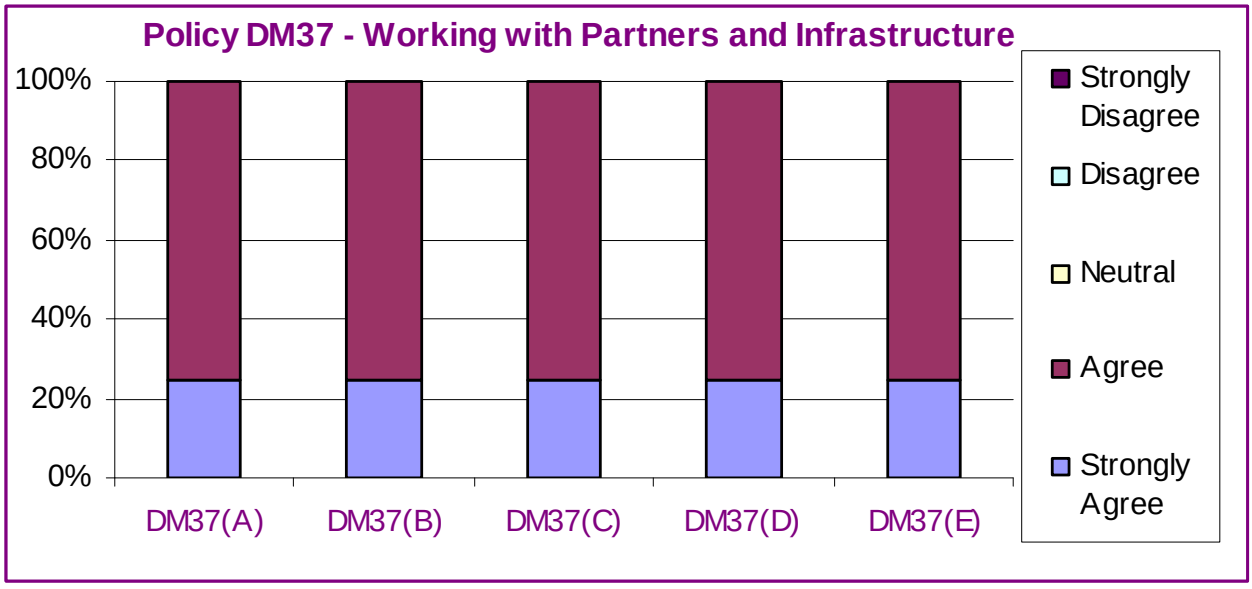
Policy DM36 - Biodiversity

Policy	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Total
DM36(A) Site of Importance for Nature Conservation - for exceptional situation developments subject to suitable planning obligations and/or adopted tariff	3	3	0	0	0	6
	50%	50%	0%	0%	0%	
DM36(B) Where there are existing biodiversity resources on-site or in the vicinity of a development site, the developer must submit an assessment with the planning application to outline the value or this resource, along with	3	3	0	0	0	6
	50%	50%	0%	0%	0%	
DM36(C) Where appropriate, Development proposals must provide measures to support species and habitats through the use of landscaping on or adjacent to buildings.	3	3	0	0	0	6
	50%	50%	0%	0%	0%	
DM36(D) Where vacant or derelict land is awaiting redevelopment and has some value for nature conservation, the Council will expect it to be protected on a temporary basis.	3	3	0	0	0	6
	50%	50%	0%	0%	0%	
DM36(E) Development proposals will be expected to improve sensitive public access to areas of nature conservation, especially in areas of deficiency.	2	3	0	0	0	5
	40%	60%	0%	0%	0%	
DM36(F)Development proposals should protect, enhance and extend the network of Green Corridors where possible.	3	3	0	0	0	6
	50%	50%	0%	0%	0%	
DM36(G) An arboricultural report must be submitted where a development proposal will impact on trees.	4	2	0	0	0	6
	67%	33%	0%	0%	0%	



Policy DM37 - Working with Partners and Infrastructure

Policy	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Total
DM37(A) Where necessary, the Council will seek a planning obligation in order to facilitate development.	1	3	0	0	0	4
	25%	75%	0%	0%	0%	
DM37(B) The Council will negotiate planning obligations in relation to proposed development.	1	3	0	0	0	4
	25%	75%	0%	0%	0%	
DM37(C) Phasing and pooling of contributions may be necessary.	1	3	0	0	0	4
	25%	75%	0%	0%	0%	
DM37(D) The Council will take into account the contribution that land use swaps, housing credits and off-site contributions can make, through mixed use development	1	3	0	0	0	4
	25%	75%	0%	0%	0%	
DM37(E) Categories of S106 contributions as set in the plan	1	3	0	0	0	4
	25%	75%	0%	0%	0%	



Development Management Policies Preferred Options

Public Consultation Report

Part 2
Representations from Consultees and Council's Response

July 2012

Waltham Forest

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Development Management Policies Preferred Options - Schedule of Representations and Council's Response (213 comments from 34 consultees)

Name/ Organisation	Comment ID	Chapter	Comments from Consultee	Council's Response
Leyton Orient Football Club and Matchroom Ltd (Agent: Mr Clive Thompson, Director, Woodhall Properties)	dmppo117	01 - Introduction	(a) Whilst I support the efforts of Waltham Forest to enforce a 'paternal' influence on the next 10 years of development in the Borough; however time is of the essence! With the 80% conclusion of the Northern Fringe of the Olympic Village by 2012 save for the terraced housing, this potentially leaves BWF tagging along behind. The Borough now has the chance to be proactive and use the next 18 months to pursue new initiatives for regeneration. This allows from say 2013 a seamless continuation of development benefiting from the infrastructure then already completed. 'Proactive' has to be the watchword. (b) Flexibility of approach supporting community benefits in balance with affordable housing which might only average 30%-35% otherwise NO schemes will be built for 3 years. Its your decision. The Authority will loose damaging revenue if it procrastinates on development initiatives - do look at your current live applications to prove my point. RISK AND REWARD!	(a) Comments noted. (b) Details of Affordable Housing are dealt with in Policy DM3 Affordable Housing Provision.
New Lammas Lands Defence Committee (Ms Katy Andrews, Planning Liaison Officer)	dmppo295	01 - Introduction	(a) It is a legal requirement in section 14(2) of the Lee Valley Regional Park Act (1966) that the Borough's LDF, and in particular the NOF AAP, must relate to the LVRP Authority's Park Plan for future management of the Regional Park. (b) The LVRPA are currently consulting on their new, emerging 'Park Development Framework', and it is essential that Waltham Forest should review the 'Preferred Options' to ensure that policies within and affecting the Lee Valley Regional Park Authority's aspirations for specific land use and leisure development options, especially within the NOF AAP.	(a) Comments noted. (b) Comments supported.
The Greater London Authority (Giles Dolphin, Planning Decisions Unit)	dmppo248	01 - Introduction	a) The most significant strategic issues raised by the document are outlined in this report. However, a more detailed response is provided in the attached appendix (table of comments), which addresses Transport issues. b) Officer level comments were provided to Waltham Forest Council's LDF officers informally in November and December 2010 on their informal draft core strategy consultation. Various suggestions were made in relation to the following policy areas: housing, Gypsies and travellers, Lifetime homes and wheelchair accessible housing, tall buildings, waste, energy and climate change, open space, biodiversity and amenity space/children's play space.	a) Noted. b) Noted. Suggestions were added to appropriate policy areas. c) Support noted. d) Noted. e) The Council will contact GLA to ensure the DM Policies Proposed Submission document is in general conformity with the London Plan. f) The Council will continue to liaise with the Mayor to ensure that required amendments are made in the DM Policies Proposed Submission.

Name/ Organisation	Comment ID	Chapter	Comments from Consultee	Council's Response
			c) Subsequently, it is felt that the Core Strategy and Development Management Policies Preferred Options document are both very comprehensive. This document can be particularly applauded for its policies on Life Time Homes and Wheelchair Accessibility, Development Spaces Standards, Parking standards and play space. d) Legal considerations - The Mayor has been consulted under Regulation 25 of the Regulations at the proposals/preferred options stage of DPD formulation. Section 24(1)(b) of the Act sets out the key statutory requirement that London LDDs have to be in general conformity with the London Plan. This statutory requirement applies to all LDDs in a Borough's LDF. Conclusion The Council have made considerable progress in this latest round of policy development. Whilst the DPD contains many aspects in general conformity with the London Plan and positively includes a number of amendments raised by the Mayor at the issues and options stage, there remains a few proposed policies that are not in general conformity with the London Plan and require further alteration and discussion.	
The Olympic Delivery Authority (Alex Savine, Chief Planner, Policy and Relationships)	dmppo74	01 - Introduction	General comments on the DMP – (a) Thank you for consulting PDT on the Local Development Framework, Development Management Policies preferred options (January 2011). Overall PDT would support the proposed Development Management Policies, especially those on sustainability, design and inclusive access, and support the intention to improve links from the local area to the Olympic Park. (b) There does not appear to be specific mention of the aspiration for a new pedestrian link from Leyton Mills to the Olympic Park, and the reopening of Lea Bridge station and the Hall Farm curve, but these are referred to in other planning policy documents. PDT will welcome and support the continued designation of public open space and Metropolitan Open Land at Eton Manor to reflect the new sports facilities and parklands in post-Games phase. (c) PDT would remind LBWF that the new hydrogen bus depot on Temple Mills Lane will soon be operational and the associated HSE consultation zones will come into effect which will effect developments around the site. LBWF should ensure that they are satisfied the preferred option policies adequately cover consideration of this risk from Temple Mills Lane and similar potentially hazardous uses. (d) The whole document needs to spell checked as there are many typing errors, for example; Page 27 - typo in first line, should be "where" not "were". Page	(a) Noted. (b) Accepted. The aspiration for a new pedestrian link from Leyton Mills to the Olympic Park, and the reopening of Lea Bridge station and the Hall Farm curve will be inserted in the DPD. (c) Noted the HSE consultation zones at Temple Mills Lane area would effect developments around the site. The proposed policies in the DPD will cover consideration of any associated HSE risk from Temple Mills Lane and similar potentially hazardous uses. (d) Accepted. Error correction will be made in appropriate places in the DM Policies Proposed Submission.

Name/ Organisation	Comment ID	Chapter	Comments from Consultee	Council's Response
			30 - typo in second line of part e, should be “are” not “a”, and in f should be “ensure” not “ensuring”. Page 34 - 5.5, typo on the second line “and” not “an”. Page 37 - 6.8, typo on line three “and” not “ans”. Page 46 - 8.13, typo in last word. Page 53 - policy DM10 a “short” not “shot”. Page 161: Policy DM31, para.32.4 typo disable people can use all features within the site Page 161 - Policy DM31, para. 32.6 approach routes need to be level, clearly defined and well lit and not ‘light’ Page 161: Policy DM31, para 32.7 to ensure that design proposals focus on both the initial and final scheme.	
Dr Robert Gay	dmppo35	02 - Policy DM1 - Mixed Use Development	I do not think it is appropriate to require a 'contribution towards employment'. Speaking with regard to Leytonstone, the area was developed following the coming of the railway as a residential area for central London, and I think it should be planned to keep its character as a residential area, with only those uses in way of employment which are needed to serve those living here, such as local shops, car repair, medical etc	Comments noted.
GL Hearn Planning (Emma Beardmore)	dmppo325	02 - Policy DM1 - Mixed Use Development	The promotion of mixed used development in appropriate areas in the borough, as set out in Policy DM1 is supported. The wording of such a policy needs to acknowledge that to a certain extent the mix of uses proposed will reflect market need. The wording of the policy should therefore not limit the range of uses proposed, subject to meeting the tests of the other development plan policies.	Comments noted.
Leyton Orient Football Club and Matchroom Ltd (Agent: Mr Clive Thompson, Director, Woodhall Properties)	dmppo80	02 - Policy DM1 - Mixed Use Development	All the area to the North of Ruckholt Road needs re-generation. This comprises Bywaters, Thames Water, Score Project, allotment land (pt) and if appropriate land to the east including L.O.F.C stadium which doesn't cater for growth into the Championship League and for which the zoning of mixed use should be retained for future initiatives to protect its viability having regard to the inward investment by the owner.	Comments noted. Details of the sites are being considered at the Northern Olympic Fringe Area Action Plan.
London & Quadrant Housing Trust (Agent: Mr Adrian Kearley, AKA Planning)	dmppo21	02 - Policy DM1 - Mixed Use Development	(a) L&Q support the explicit recognition of the redevelopment potential of the key sites, in particular Walthamstow Stadium. We welcome the recognition of the need for a mix of uses, including housing, on these sites. For the Walthamstow Stadium site it is important to note that L&Q consider that the only viable means of meeting this objective involves the loss of the former greyhound use. Whilst the principle of a Site Allocations DPD is encouraged, it is not considered appropriate to defer determination of a planning application that meets the policy objectives in advance of the publication of the DPD. The last sentence of the paragraph relating to Other Key Sites	(a) Comments noted. However master plan approach is not the same as a development plan document (DPD). (b) Comments noted. Appropriate planning obligations and tariff schedule will be used for developers’ contributions. Regarding Walthamstow Stadium, the Council in June 2011 received a planning application (Ref. 2011/0898) for a mixed-use development comprising leisure use, community allotment, 301 new dwellings,

Name/ Organisation	Comment ID	Chapter	Comments from Consultee	Council's Response
			should read, “Plans for these sites will be detailed in the Site Allocations Development Plan Document unless already brought forward through an appropriate masterplan approach.” This should also be reflected in the supporting text at paragraph 2.22. (b) Criterion (h) should acknowledge the Community Infrastructure Levy (CIL) as the most likely form of tariff to be used over the plan period. The Key Diagram should identify the key sites listed in Policy DM1.	children’s nursery, café, crèche, public open space, associated parking, landscaping and de-culverting of the River Ching. The application was considered by the Planning Committee in May 2012. Members resolved to grant the proposal, subject to conditions, referral to the Greater London Authority and completion of the s106 Agreement.
New Lammas Lands Defence Committee (Ms Katy Andrews, Planning Liaison Officer)	dmppo279	02 - Policy DM1 - Mixed Use Development	Loss of existing open space should be resisted. There should be no negative impact on existing wildlife habitats, and biodiversity should be enhanced wherever possible	Comments supported. Details of Open Space matters are at Policy DM13 Open Space, Sport and Recreation.
North East London NHS Foundation Trust (Agent: Mark Underwood, Drivers Jonas Deloitte)	dmppo278	02 - Policy DM1 - Mixed Use Development	NELFT considers that mixed use development should not necessarily be restricted to locations within the Borough. Consideration should also be given to the characteristics of a particular site should it come forward for development.	Noted. Any proposed mixed use development should meet with the criteria as included in Policy DM1.
Rapleys (Anthony Pharoah, Senior Planner)	dmppo15	02 - Policy DM1 - Mixed Use Development	(a) We agree with the general principle that existing employment land should be intensified and upgraded in regeneration areas of Blackhorse Lane the Northern Olympic Fringe Area, Wood Street, Walthamstow Town Centre. However, it should be noted that areas outside of these locations should be recognised for new employment land allocations, if they are good and appropriate locations. (b) Accordingly, we encourage the provision of employment spaces suitable for small and medium size enterprises and encourage the Council to provide appropriate facilities in accessible locations which serves the needs of businesses with good access to the strategic road network. A flexible approach should be encouraged by the Council to allow non-designated employment land and premises, which are currently on the boundary of existing or recognised employment areas to be used for the expansion and extension of gross floorspace where needed by an existing user. In this respect, we promote and encourage the inclusion of Kingfisher Sports Ground being an extension to the proposed borough employment area. It is considered essential that the Council incorporates flexibility in respect of financial and economic viability for development, especially in light of current economic climates.	(a) Comments noted. (b) Details of the suggestion to include Kingfisher Sports Ground as an extension to the proposed borough employment area will be considered in Policy DM20.
The Mall Limited Partnership (Agent:	dmppo125	02 - Policy DM1 - Mixed Use	Within Policy DM1 Walthamstow Town Centre, and other areas, are identified as both "AAP Areas"\" and "Other Growth	Comments noted. Clarity would be made between the Core Strategy policies and

Name/ Organisation	Comment ID	Chapter	Comments from Consultee	Council's Response
Miss Marie Jasper, Associate Barton Willmore)		Development	Centres". It is unclear why Walthamstow Town Centre is listed as an "Other ~ "\ Growth Centre" given it's earlier Identification as an "AAP Area". Furthermore in relation the Other Growth Centres, Policy DM1 refers to "key regeneration areas", these areas are Identified on the Core Strategy Key Diagram, however Core Strategy Policy CS1 refers to these areas as "Key Growth Areas". In relation to the Core Strategy consultation we have suggested that the terminology used Is clarified. However we note that Policy DM1 suggests that the "Key Growth Areas" include the "Key Regeneration Areas" amongst other areas. This matter should be clarified in both the Core Strategy and Development Management Policies DPD. In relation to Walthamstow Town Centre the supporting text to Policy DM1 refers to the Interim Planning Policy Framework at Paragraph 2.15. However, since the IPPF was prepared, changes in the economy and occupier interest make it less certain that the form and scale of development proposed will be deliverable. This view is confirmed by the lack of progress which has been made to date in relation to the Arcade site, as referred to in Paragraph 2.15 of the draft Development Management Policies DPD. Since adoption of the IPPF in May 2008 no suitable viable schemes have come forward which fulfil the IPPF requirements for the Arcade site, as such we understand that a predominantly residential scheme for the site may be more likely. Therefore in order to facilitate growth and regeneration prior to the adoption of the AAP we consider it appropriate to commit to an immediate review of the IPPF, taking account of commercial considerations, and potentially relocating the retail offer anticipated on the Arcade site into proposals for an extension to "The Mall". In relation to the Development Management Policies DPD the specific details of the IPPF should be removed so as not to prejudice alternative options being considered and progressed the rough the planning process, as appropriate. Accordingly Paragraph 2.15 of the DPD should be deleted.	Development Management policies. Regarding progress of the Arcade site, details should be referred to the Walthamstow Town Centre Area Action Plan.
UK Power Networks (Operations) Ltd (Agent: Annie Pang, ADRIAN SALT AND PANG)	dmppo315	02 - Policy DM1 - Mixed Use Development	Para 2.11: The proposed boundary of the North Olympic Fringe Area Action Plan artificially restricts the delineation of the AAP to coincide with the northern part of the Olympic Park and does not necessarily reflect the needs of this part of the borough. The boundary should extend eastwards to include areas with similar socio-economic characteristics and with similar characteristics in high-reported incidence of crime and anti-	Noted. The boundary of the Northern Olympic Fringe Area Action Plan has been carefully considered to reflect the growth in this part of the borough. The issue regarding crime and anti-social behaviour is dealt with in policy DM34.

Name/ Organisation	Comment ID	Chapter	Comments from Consultee	Council's Response
			social behaviour as shown in Fig. 27 of the Core Strategy Submission Document. Inclusion of this site would increase housing provision by approximately 90 units. See Fig.1 'Suggested Extension to NOF AAP' attached for the suggested extension of the boundary of the North Olympic Fringe AAP.	
Whipps Cross University Hospital NHS Trust (Agent:Mr Andy Bateson, Managing Director AB Planning & Development Limited)	dmppo18	02 - Policy DM1 - Mixed Use Development	The Whipps Cross University Hospital NHS Trust has identified 3.27ha of underused land in the northwest corner of the hospital site that will become available for redevelopment by the end of 2011. Other land may also become available as underused land that is surplus to NHS needs within future years in the Plan period. Having considered existing building heights, landscape screening, access requirements, the disposition of land uses around the underused land that will immediately come forward, the identified residential needs within the Borough and the adopted and emerging design guidance for residential developments on previously developed sites, the Hospital Trust has prepared two illustrative layout proposals for how the hospital's surplus land could be developed. If the existing underused land was redeveloped solely for flats of between 3 and 6-storey height at a net density of 147 dwellings per hectare then the site that is now available for development could accommodate 482 new homes. If the same land were to be redeveloped with a mixture of 3 to 6-storey flats coupled with 3-storey townhouses at a net density of 107 dwellings per hectare then the underused land could accommodate a reduced total of 350 new homes. The two illustrative concept plans that have been prepared by the Hospital Trust are to be provided to the Local Planning Authority as part of this DPD consultation to aid the Authorities consideration and to help demonstrate the deliverability of the policy proposals.	Consultation of the Whipps Cross Hospital NHS Trust illustrative concepts plans should be carried out by the Hospital Trust. Proposals shall comply with relevant planning policies.
Workspace Group (Agent: Andrew Ransome, Director Ransome and Company Ltd)	dmppo203	02 - Policy DM1 - Mixed Use Development	Workspace supports Policy DM1, which seeks a mix of uses in development in the key growth areas, and other appropriate areas in the borough, including a contribution towards the supply of housing and employment. When considering the most appropriate mix of uses, and the scale and nature of any contribution to the supply of housing, employment and other uses, Workspace considers that an additional criterion should be added to the policy that states that: “Mixed-use developments will be considered where the development proposals will enable the delivery the modern employment floorspace for small and medium sized business”.	Comments noted. Details of employment matters are discussed at DM19, DM20 and DM21.

Name/ Organisation	Comment ID	Chapter	Comments from Consultee	Council's Response
Dr Robert Gay	dmppo36	02 - Policy DM1-Mixed Use Development	I support the last sentence of para 2.30, in particular with regard to business uses in the Leytonstone High Road which is only one building deep and abuts onto residential premises in the side roads. I support the first two points in para 2.36. I would query the fourth point in para 2.36. To the extent that these are valid planning considerations, they should apply no less to publicly funded developments	Noted. Comments would be considered during the Proposed Submission stage.
Mr Andrew Bishop	dmppo1	02 - Policy DM1-Mixed Use Development	Walthamstow Stadium Redevelopment: The vast majority are saddened at the possible demise of the greyhound stadium into housing. The removal of so many jobs, night time economy and a leisure facility that was the envy of many to be replaced by flats, however well dressed up is a retrograde step for the borough and local community. The current system for supply of housing through housing associations and developers is not working and is blinkered thinking by policy makers. All the current model achieves are more and more flats, increased population and overstretched local services plus a nice profit for the developer(because that is what they are) and some form of short term benefit (sweetener) for the local authority. The stadium redevelopment needs a fresh view. Return the dog track with additional leisure facilities and social housing meets all in Strategic Objective 1. This is the model being followed by many countries in the western world. The return of jobs, boost to local economy, feeling of self worth, modern housing and pride in the borough are things that are necessary to Waltham Forest.	Comments Noted. Regarding Walthamstow Stadium, the Council in June 2011 received a planning application (Ref. 2011/0898) for a mixed-use development comprising leisure use, community allotment, 301 new dwellings, children's nursery, café, crèche, public open space, associated parking, landscaping and de-culverting of the River Ching. The application was considered by the Planning Committee in May 2012. Members resolved to grant the proposal, subject to conditions, referral to the Greater London Authority and completion of the s106 Agreement.
The Olympic Delivery Authority (Alex Savine, Chief Planner, Policy and Relationships)	dmppo54	02 - Policy DM1-Mixed Use Development	Section 2.12 - Are the listed sites identified anywhere? "Thames Water Site" could be vague. Section 2.13 - Second bullet point - it is not clear what "increased access" means, is it access for local communities, or increased accessibility for mobility impaired or better vehicular access? In the second to last bullet, suggest it is made clear that "park" in this statement means the Olympic Park, and does this bullet point refer to the aspiration to create a new pedestrian link between Leyton Mills and the Olympic Park?	The listed sites are identified in the Northern Olympic Fringe Area Action Plan. Each opportunity site consists of description of opportunity. Section 2.13 bullet point refers to access for local communities and increased accessibility for mobility impaired and better vehicular access.
Dr Robert Gay	dmppo37	03 - Policy DM2-Meeting Housing Targets	I support paragraph 3.3	Support noted
Mr Andrew Bishop	dmppo2	03 - Policy DM2-Meeting Housing Targets	It is re assuring to note the council is considering a quality led approach in ensuring existing residential land redevelopment has to consider the building of three bedroom plus homes and not blindly following saturation building of flats. Quality led	Support noted

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			housing with mixed uses is the way forward to improving the borough.	
Mrs Madeleine Munday	dmppo6	03 - Policy DM2- Meeting Housing Targets	We need more family houses as you say; not flats. Young children need open spaces.	Support noted
North East London NHS Foundation Trust (Agent: Mark Underwood, Drivers Jonas Deloitte)	dmppo336	03 - Policy DM2- Meeting Housing Targets	NELFT notes that if housing is to be lost as part of redevelopment, LBWF should ensure that the maximum potential for other housing sites is met.	Noted - It is the Council's aim to maximise housing, particularly affordable housing on all appropriate site in the borough. As stated in the list of criteria in policy DM2.
UK Power Networks (Operations) Ltd (Agent: Annie Pang, ADRIAN SALT AND PANG)	dmppo316	03 - Policy DM2- Meeting Housing Targets	To ensure housing targets are met, land currently reserved for infrastructure development which can be released for alternative uses should be included in the housing allocation as opportunity sites.	Noted -The SHLAA and HLAA demonstrate the sites which are considered in the Council's housing capacity. Housing designations would be dealt with through either the proposed Area Action Plans or the Site Specific Allocations DPD.
Aviva Life and Pensions UK Ltd (Agent: Sarah Dawson, Associate Barton Willmore)	dmppo235	04 - Policy DM3 - Affordable Housing Provision	We consider that this policy wording should include reference to the imminent replacement London Plan and any other changes to planning policy guidance on affordable housing which may impact upon the tenure mix for affordable housing being sort. The policy should enable variation in levels of affordable housing based on issues such as development viability and RSL preferences.	Noted - The Council will consider changes to the policy and justification in light of changes to NPPF and London Plan. It is the Council's view that sufficient flexibility is provided in the policy as outlined in paragraph 4.10.
Dr Robert Gay	dmppo38	04 - Policy DM3 - Affordable Housing Provision	I support para 4.9 I would query para 4.8. I think people should be free to buy 'affordable housing', provided the purchase price is invested in the provision of further affordable housing	Support noted - It is the Council's view that affordable housing should remain in perpetuity in order to maintain a sufficient level of affordable housing in the existing housing stock.
GL Hearn Planning (Emma Beardmore)	dmppo327	04 - Policy DM3 - Affordable Housing Provision	This should accord with policy 3.12 which requires council's to maximise housing delivery over a plan period rather than apply rigid targets. The wording of clause c which states: "where housing schemes offer below 50% affordable housing, the council will require the shortfall to be treated as a deferred contribution to ensure schemes provide the maximum reasonable amount of affordable housing on each site." It is considered that the wording of this policy is ambiguous. It needs to be more clearly defined that in the negotiation of affordable housing the local authority are able to use mechanisms such as claw back in order to enable the delivery of affordable housing within the borough. In addition the wording of the policy needs to reflect the approach as set out	Noted - The Council will provide greater detail and clarity in relation to point C in this policy. The DM policy will reflect the stance taken in the Core Strategy. The Council agree that this policy should be reworded to provide more clarity.

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			within the core strategy which has introduced the use of suchas mechanism. Paragraph of the waltham forest ldf core strategy - proposed submission document confirms that the actual approach will be as follows: “where a viability case if used to justify an affordable housing offer below 50%, the council will require the shortfall to be treated as a deferred contribution. The council will then require a subsequent viability assessment to be undertaken when the scheme is complete and occupied and should viability have improved, the council will seek a further payment up to a maximum of the deferred sum.” The development management policies - preferred options should reflect the approach as set out in the core strategy with regard to the methodology of applying the cascade. It is considered that criteria d) is unviable with regard to the delivery of mixed use development schemes. The criteria should be re-worded as follows: “where residential development sites are phased, the council will seek to use legal agreements to ensure that all parts of phases make an appropriate affordable contribution.”	
Leyton Orient Football Club and Matchroom Ltd (Agent: Mr Clive Thompson, Director, Woodhall Properties)	dmppo82	04 - Policy DM3 - Affordable Housing Provision	Issues such as 'on site' provision of affordable housing have to be specific to each site as the other contributions to community benefit arising out of a mixed use scheme may be more appropriate. 'Flexibility' is the key word for this policy.	Noted - While the Council will take a flexible approach, as stated paragraph 4.10, to affordable housing contributions we will only allow of site contributions in exceptional circumstances.
London & Quadrant Housing Trust (Agent: Mr Adrian Kearley, AKA Planning)	dmppo22	04 - Policy DM3 - Affordable Housing Provision	L&Q support Policy DM3 but any mechanism to secure the requirement in criterion (c) should not be put in place until such time as more detailed guidance has been issued and this has been formally consulted on. This guidance must be more explicit about the cut-off point for deferred contributions, the level of flexibility that can be applied and the possible approaches to agreeing where such flexibility must be applied. By this, we mean what the appropriate approach might be to negotiation and agreeing assumptions. The dynamic viability model must also reflect the potential to agree an approach on a phased scheme in order to maximise certainty for both parties. Circular 05/2005 states that planning obligations should never be used purely as means of securing a share in the profits of a development, but need to serve a material planning purpose. The provision of affordable housing in line with adopted development plan policies is such a purpose. However, planning agreements which provide for ‘claw-back’ arrangements based on a share in the improved sales values in the form of obligations which are over and above those	Noted - The Council will provide greater guidance and clarity in relation to criteria c and d.

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			assumed at commencement of the development, might be in conflict with this guidance. Criterion (d) should refer to the ability on phased sites for levels of affordable housing to be agreed at the outset of each phase. This provides a greater chance of the required level of affordable housing being provided over the whole scheme. Criterion (f) should specifically refer to cases where deferred contributions are required, because these clearly cannot be delivered on site following the completion of a scheme.	
Mr Andrew Bishop	dmppo3	04 - Policy DM3 - Affordable Housing Provision	Walthamstow Stadium. Having viewed the three current outline development proposals for the site i.e (1) Bob Mortons return of the track with 100 plus social housing units and extra local and leisure facilities (2) Nick Budimirs return of the track, hotel and housing etc and (3) L and Q's mainly housing led development. I am of the opinion that the borough social housing needs would be better met by either (1) or (2) as the investment return would come through the viable greyhound stadium and leisure/hotel facilities. L and Q's return relies on building enough units to sell at a premium. The social housing development is less likely to degenerate in the mixed use development with supervised racing etc happening on a regular basis.	Noted - The Development Management policies provide criteria in the assessment of planning applications. Regarding Walthamstow Stadium, the Council in June 2011 received a planning application (Ref. 2011/0898) for a mixed-use development comprising leisure use, community allotment, 301 new dwellings, children's nursery, café, crèche, public open space, associated parking, landscaping and de-culverting of the River Ching. The application was considered by the Planning Committee in May 2012. Members resolved to grant the proposal, subject to conditions, referral to the Greater London Authority and completion of the s106 Agreement.
North East London NHS Foundation Trust (Agent: Mark Underwood, Drivers Jonas Deloitte)	dmppo337	04 - Policy DM3 - Affordable Housing Provision	NELFT agrees that there is a need for affordable housing to be provided on site, However, the quantity and location of affordable housing to be provided should be judged on a site-by-site basis; an on-site provision may not always be practical or possible. NELFT agrees that assessments of viability are essential to ascertain the appropriate level of affordable housing provision on a given site.	Support noted - While the Council will take a flexible approach to affordable housing contributions, as stated in paragraph 4.10, we will only allow off site contributions in exceptional circumstances.
Workspace Group (Agent: Andrew Ransome, Director Ransome and Company Ltd)	dmppo205	04 - Policy DM3 - Affordable Housing Provision	Workspace objects to Policy DM3, as it is not sufficiently flexible. Workspace supports the principle of affordable housing provision in new developments for the purposes of securing local need and ensuring a mixed and sustainable community. However, such provision should be considered on a site-by-site basis, together with its viability and the regeneration benefits a scheme could provide. The 'Waltham Forest Dynamic Viability Model (2009)' is referred to within the policy, however this document does not appear to publicly available in which to	Noted - The Council has provided sufficient flexibility in paragraph 4.10. The Council's Affordable Housing Viability Assessment can be found on the Council's website and is included in the list of evidence base documents. The 50% affordable housing target is in conformity with the London Plan and based on evidence in our Housing Needs Market Survey (2007) and Affordable

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			assess. There is no information on the Council's website to suggest that this assessment has been undertaken. Workspace considers that the requirement to provide a minimum of 50% affordable housing on development sites is unreasonable as it not based reliable information and that this approach will potentially impact upon the viability of development schemes in the borough. It does not take account of market conditions and that Waltham Forest is generally a low-value area compared with other parts of London. This policy therefore does not sufficiently take account the risks of delivery as prescribed by PPS3 in paragraph 29. Workspace considers that the Council should consider the 'Waltham Forest Housing Need and Market Assessment (2007)' which states in paragraph 1.12.5 that each site will need to be assessed individually with targets being subject to wider planning, economic viability, regeneration and sustainability considerations and will require a flexible approach to specific site negotiation.	Housing Viability Assessment (2009).
Dr Robert Gay	dmppo39	05 - Policy DM4 - Residential Extensions and Alterations	In general I strongly support what is said in this chapter. However, I object to para 5.6 with regard to 'Design and Access Statements', in relation to applications for residential extensions and alterations. The procedure for householder applications for alterations and extensions to people's homes should be kept as simple as possible and costs for applicants should not be increased. The council's officers should be able to decide from the plans and from a site visit whether the points in the policy are satisfied or not	Noted - the Council proposes a more general policy but includes heritage as a key consideration within the justification.
English Heritage (Nicholas Bishop, Regional Planning Advisor - London Region)	dmppo301	05 - Policy DM4 - Residential Extensions and Alterations	Policy DM4 Residential Extensions and Alterations We welcome policy DM4 which will help ensure that residential alterations do not cumulatively erode the local character. In addition to the considerations suggested it might be worth seeking to protect consistent rooflines and to ensure that extensions are subservient to the existing building in terms of size and bulk. In addition we would advise that the heritage interest of the existing building is recognised in part a of the policy, as proposed below: Respect the, heritage interest, architectural character, window and door size pattern, materials, details and other conventions of the original building.	Noted - the Council proposes a more general policy but includes heritage as a key consideration within the justification.
English Heritage (Nicholas Bishop, Regional Planning Advisor - London Region)	dmppo302	05 - Policy DM4 - Residential Extensions and Alterations	Residential Extensions and Alterations Justification (Para 5.2) The historic character of Waltham Forest's Victorian and Edwardian suburbs is a key component of the Borough's local distinctiveness, as articulated in the Core Strategy. The potential for cumulative erosion of historic character could be	Noted - the Council proposes a more general policy but includes character, context and heritage as a key consideration within the justification.

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			usefully cited as further justification for policy DM4.	
Leyton Orient Football Club and Matchroom Ltd (Agent: Mr Clive Thompson, Director, Woodhall Properties)	dmppo83	05 - Policy DM4 - Residential Extensions and Alterations	Site specific-again flexibility	Noted
Aviva Life and Pensions UK Ltd (Agent: Sarah Dawson, Associate Barton Willmore)	dmppo236	06 - Policy DM5 - Housing Mix	Again we consider that this policy should reflect the recent changes to affordable housing guidance and also ensure that the Housing Needs Survey is updated from the previous survey in 2008. The policy wording should ensure that there is clear strategic direction for the provision of a suitable housing mix without being too prescriptive whilst allowing variation where specific circumstances justify this, such as viability etc. We consider that in light of the recent Government consultation on affordable housing technical definition and the changes to Affordable Rent programme that the Council should remove their preferred dwelling mix table.	Noted - The Council state that dwelling mix should be considered on a site by site basis. The Council will propose an updates mix based on government guidance and local studies.
Dr Robert Gay	dmppo40	06 - Policy DM5 - Housing Mix	I strongly support para 6.4, in particular the first sentence. However, I would question whether the Council has properly thought through the implications of keeping the area as a residential area which will attract people who are financially able to live further out into Essex. I support para 6.7	Support noted
GL Hearn Planning (Emma Beardmore)	dmppo328	06 - Policy DM5 - Housing Mix	Whilst not reiterating planning policy, as set out at the national and regional level, local development frameworks should, in accordance with guidance as set out in pps12 reflect the strategic guidance as set out within these documents. Paragraph 10 of planning policy statement 3 (pps3) housing (2010) sets out that the planning system should deliver 'a mix of housing, both market and affordable, particularly in terms of tenure and price to support a wide variety of households in all areas.' to achieve this goal paragraph 11 of pps3 guides that an evidence based policy approach should be adopted. It states 'local development documents and regional spatial strategies should be informed by a robust, shared evidence base, in particular of housing need and demand, through a strategic housing market assessment and land availability, through a strategic housing land availability assessment. Underpinning guidance as set out in pps3 is the plan, monitor, manage approach to housing delivery. Paying due regard to these requirements it is considered that the evidence base upon which the policies of the core strategy and development management policies is somewhat out of date, having been	Noted – The dwelling mix will be up dated upon the findings of a new SHMA.

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			published in 2007 and 2008. Whilst it is acknowledged that paragraph 6.6 states that 'the council will continue to monitor its preferred mix and update when required,' this monitor and manage approach is not reflected in the wording of policy dm5 and a revised preferred mix would have no material weight in the determination of planning applications unless it has undergone public consultation.	
Leyton Orient Football Club and Matchroom Ltd (Agent: Mr Clive Thompson, Director, Woodhall Properties)	dmppo84	06 - Policy DM5 - Housing Mix	A) Each site must be judged on its size and location and special local needs and there may be a need to offer a mix of uses.	Noted – The dwelling mix will be up dated upon the findings of a new SHMA. The Council will include a set of criteria where variation/flexibility may be appropriate/ acceptable.
London & Quadrant Housing Trust (Agent: Mr Adrian Kearley, AKA Planning)	dmppo23	06 - Policy DM5 - Housing Mix	L&Q object to Policy DM5. Whilst L&Q supports the overall need for increased family housing, the preferred housing mix needs to be flexible in order to reflect what is practical on any given site, taking into account scheme viability, site location and local need and supply. In addition, the requirement should be based on a habitable room rather than unit assessment.	Noted – The dwelling mix will be up dated upon the findings of a new SHMA. The Council will include a set of criteria where variation/flexibility may be appropriate/ acceptable.
North East London NHS Foundation Trust (Agent: Mark Underwood, Drivers Jonas Deloitte)	dmppo339	06 - Policy DM5 - Housing Mix	NELFT agrees that there is a need for a mix of housing types to be provided across the Borough and across sites. However, in view of London Plan density targets and other assessments of housing need, the precise range and type of housing provided should be negotiated on a site-by-site basis.	Noted – The dwelling mix will be up dated upon the findings of a new SHMA. The Council will include a set of criteria where variation/flexibility may be appropriate/ acceptable.
The Olympic Delivery Authority (Alex Savine, Chief Planner, Policy and Relationships)	dmppo55	06 - Policy DM5 - Housing Mix	The Council's aspirations to meet the diverse needs of the population as set out in paras. 6.2, 6.3 and 6.4 are welcome. The chapter and policies attempts to strike the necessary balance between meeting the range of housing needs for social family housing and private housing for the borough's young professionals and existing residents who succeed and meet their potential. The general housing mix as set out in the "Preferred Dwelling Mix" table is noted but the final wording of Policy DM5 could perhaps set out the circumstances in which any significant variation would be contemplated.	Noted – The dwelling mix will be up dated upon the findings of a new SHMA. The Council will include a set of criteria where variation/flexibility may be appropriate/ acceptable.
UK Power Networks (Operations) Ltd (Agent: Annie Pang, ADRIAN SALT AND PANG)	dmppo318	06 - Policy DM5 - Housing Mix	Policy DM5 should be subject to the characteristics of the site and in addition the provision of large sized homes should be subject to market demand.	Noted - The Council will consider include a set of criteria where variation/flexibility may be appropriate/acceptable. The preferred mix will be maintained to bring try and balance the existing housing stock by increasing the number of family homes which the market has previously failed to deliver which has led to a significant need for larger homes and overcrowding in the

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				borough.
Workspace Group (Agent: Andrew Ransome, Director Ransome and Company Ltd)	dmppo206	06 - Policy DM5 - Housing Mix	Workspace considers that Policy DM5 should be more flexible and state that the housing mix will be considered on a site-by-site basis. Paragraph 23 of PPS3 states that developers should bring forward proposals for market housing which reflects the demand and the profile of households requiring market housing, in order to sustain mixed communities. It is important that the market housing mix is determined by the private sector so that residential schemes can respond to the market demands and site specifics at any given time, taking into account market signals.	Noted - The dwelling mix will be up dated upon the findings of a new SHMA. The Council will include a set of criteria where variation/flexibility may be appropriate/acceptable. The preferred mix will be maintained in order to balance the existing housing stock by increasing the number of family homes which the market has previously failed to deliver has led to a significant need for larger homes and overcrowding in the borough.
Dr Robert Gay	dmppo41	07 - Policy DM6 - Housing Conversions	under (A) I am not sure whether the criteria are 'and' or 'or'. In general, I would query whether it is always appropriate to restrict conversions. If there are any single-household houses left on the busy parts of the Leytonstone High Road, I would think them more appropriate to convert to dwellings for people without children	Noted - The Council seek to protect larger homes from conversions. Leytonstone is in an area where there are high numbers of housing conversions. This policy is designed to protect our larger houses and reduce the problems often generated by flat conversions.
Dr Robert Gay	dmppo42	07 - Policy DM6 - Housing Conversions	I strongly support para 7.2 I agree with para 7.4, but it is not only conversions and HMO's which can have such a negative impact. Why does the policy at (B) ix mention car and cycle parking, but not motorcycle parking? Powered two wheel vehicles have a contribution to make to transport, and there are particular problems with theft of motorcycles.	Support noted. Paragraph 18.15 of DM17 sets out the Council's approach to motor cycle parking.
Environment Agency (Miss Nancy Young, Planning Liaison Officer)	dmppo118	07 - Policy DM6 - Housing Conversions	Point x- It is highlighted that there is a need for all properties including conversions to be energy efficient. This statement should be expanded to include equal reference to water efficiency. There is an increase recognition of the link between energy and water use. When household and water company emissions are considered together 89% (Water for People and the Environment, Environment Agency 2010) of emissions come form water in the home. This accounts for 27% (draft London Water statement) of all carbon emissions.	Noted - The Council will include a reference to water efficiency in the policy.
Leyton Orient Football Club and Matchroom Ltd (Agent: Mr Clive Thompson, Director, Woodhall Properties)	dmppo85	07 - Policy DM6 - Housing Conversions	C) To put all homes to best purpose it might be necessary to have an MRO rather than a large derelict property where appropriate.	Noted
Aviva Life and Pensions UK Ltd	dmppo237	08 - Policy DM7 - Internal and	This policy should generally reflect the replacement London Plan guidance whilst also incorporating a greater degree of	Noted – Add a statement stating that the level of amenity space will be considered on

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(Agent: Sarah Dawson, Associate Barton Willmore)		External Amenity Space Standards	flexibility to allow scheme designs to reflect the constraints of development so as not to frustrate development proposals coming forward.	a site by site basis.
Dr Robert Gay	dmppo43	08 - Policy DM7 - Internal and External Amenity Space Standards	The policy also states the council will resist residential development on back garden land. While this is often appropriate in some places back gardens are very long and development in the back garden area can take place without intruding visually and while leaving adequate back garden space both for the existing houses and for the new development. The Council should resist usually, but not as an iron rule	Noted. The definition change in NPPF now means back garden land is not considered to be previously developed land.
GL Hearn Planning (Emma Beardmore)	dmppo329	08 - Policy DM7 - Internal and External Amenity Space Standards	Clarification is required in respect of the adoption under criterion b) of a standard of 15sqm per habitable room of private amenity space. There is no explanation in the supporting text or policy as to how this standard has been derived.	Noted - The Council will provide greater detail in relation to external amenity space standards.
Leyton Orient Football Club and Matchroom Ltd (Agent: Mr Clive Thompson, Director, Woodhall Properties)	dmppo86	08 - Policy DM7 - Internal and External Amenity Space Standards	B) This cannot be a blanket or mandatory requirement- good design is the criteria.	Noted – Add a statement stating that the level of amenity space will be considered on a site by site basis.
London & Quadrant Housing Trust (Agent: Mr Adrian Kearley, AKA Planning)	dmppo24	08 - Policy DM7 - Internal and External Amenity Space Standards	L&Q object to criterion (b) of Policy DM7. The provision of 15sqm per unit of private amenity space is inappropriate for flatted development because it creates unrealistically high requirements. For private developments, this requirement may go beyond many user demands. It is reasonable, however, to insist on some private amenity space for all units, but allowing for this to be in the form of balconies and terraces. The policy wording should therefore be revised to read, “Proposals for new dwellings, both new build and from conversions, should seek where reasonable to provide 15 sqm per habitable room of private amenity space.”	Noted – Add a statement stating that the level of amenity space will be considered on a site by site basis.
UK Power Networks (Operations) Ltd (Agent: Annie Pang, ADRIAN SALT AND PANG)	dmppo319	08 - Policy DM7 - Internal and External Amenity Space Standards	Private amenity space should be provided whenever practicable and any shortfall should be compensated by private communal amenity space and/or off-site contributions. Family housing should be provided with rear gardens where practicable. A fixed requirement of 15 sq. m per habitable room of private amenity may servely restrict the number of residential units being development at a financially viable rate.	Noted – Add a statement stating that the level of amenity space will be considered on a site by site basis.
Dr Robert Gay	dmppo44	09 - Policy DM8 - Housing Quality	Why does the policy deal with cycle parking and car parking, but not with motorcycle parking? There are specific problems	Noted - Motor cycle parking is dealt with in policy DM17 paragraph 18.15

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		and Accessibility	with theft of motorcycles, which require to be specifically addressed	
Dr Robert Gay	dmppo45	09 - Policy DM8 - Housing Quality and Accessibility	There is a lot of good in this chapter I would query what is said about high density development. In general, there should not be high rise buildings in our area.	Support noted. High density development does not necessarily mean high rise development. As indicated in paragraph 9.10, the Council aims to located higher density development in appropriate locations such as town centre which have good access to public transport.
English Heritage (Nicholas Bishop, Regional Planning Advisor - London Region)	dmppo303	09 - Policy DM8 - Housing Quality and Accessibility	Policy DM8 Housing Quality and Accessibility In general we support this policy subject to the inclusion of heritage interest, in part 1, as proposed below: Positively respond to the physical context of the site and its surroundings, taking into account of local character, heritage interest, built form, scale and massing, materials and landscaping etc.	Agreed - The Council will include the need to consider heritage interest in the justification.
London & Quadrant Housing Trust (Agent: Mr Adrian Kearley, AKA Planning)	dmppo25	09 - Policy DM8 - Housing Quality and Accessibility	L&Q support the objectives of Policy DM8	Support noted
London & Quadrant Housing Trust (Agent: Mr Adrian Kearley, AKA Planning)	dmppo26	09 - Policy DM8 - Housing Quality and Accessibility	L&Q support the objectives of Policy DM8	Support noted
London & Quadrant Housing Trust (Agent: Mr Adrian Kearley, AKA Planning)	dmppo27	09 - Policy DM8 - Housing Quality and Accessibility	L&Q support the objectives of Policy DM8.	Support noted
The Olympic Delivery Authority (Alex Savine, Chief Planner, Policy and Relationships)	dmppo56	09 - Policy DM8 - Housing Quality and Accessibility	Suggest that reference is made to developments being accessible, and amenity areas being accessible, not just the units. A cross reference to the accessible parking requirements would also be helpful.	Agreed - The Council will reference the need for amenity areas etc to be accessible and a link this with the parking standards.
UK Power Networks (Operations) Ltd (Agent: Annie Pang, ADRIAN SALT AND PANG)	dmppo320	09 - Policy DM8 - Housing Quality and Accessibility	Policy DM8 (4) and in paras. 8.13 and 8.14: In flatted developments, it may be impractical to ensure that accommodation is sufficiently flexible to cater to changing needs such as facilities for wheelchair access.	Noted - In line with the London Plan we will aim to ensure that all units are built to Lifetime Homes standards and the only 10% to be 'wheelchair accessible' (or easily adapted).
Workspace Group (Agent: Andrew Ransome, Director Ransome and	dmppo207	09 - Policy DM8 - Housing Quality and Accessibility	Workspace supports the principle of creating high quality housing with a functional internal environment however applying rigid space standards as required by Part 4 may undermine housing delivery and fail to support other Council	Noted - These standards reflect the Mayor of London's standards in the London Housing Design Guide.

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Company Ltd)			objectives. Minimum space standards may not lead to balanced and healthy neighbourhoods if applied without looking at the context. Space standards should be balanced against other considerations in this plan including the need to create balanced communities, liveable neighbourhoods and enabling regeneration opportunities. Furthermore, the requirement to meet minimum space standards could stifle innovative design.	
City of London (Paul Thomson, Superintendent of Epping Forest)	dmppo77	10 - Policy DM9 - Gypsy and Travellers Provision	There should be additional wording to ensure that v) and vi) are clarified in terms of designated land protected as recreational open space and for biodiversity so that Epping Forest is clearly protected and buffered from this type of development as it would be from housing or other potentially more permanent development.	Noted - The Council will include additional examples of pre-existing policy designations to provide greater clarity.
Dr Robert Gay	dmppo46	10 - Policy DM9 - Gypsy and Travellers Provision	The criterion at (vii) should be not 'limited harm' but 'no harm'	Noted - Policy wording will be changes to state "have no significant adverse impact on the visual amenity"
Environment Agency (Miss Nancy Young, Planning Liaison Officer)	dmppo119	10 - Policy DM9 - Gypsy and Travellers Provision	We are very pleased with point x. in the policy which recognises that this use is not suitable in areas at high risk of flooding.	support noted
North East London NHS Foundation Trust (Agent: Mark Underwood, Drivers Jonas Deloitte)	dmppo344	11 - Policy DM10 - Specialised Housing	NELFT agrees that the provision of specialised housing is important, and that its development should be supported in appropriate locations.	Support noted
Aviva Life and Pensions UK Ltd (Agent: Sarah Dawson, Associate Barton Willmore)	dmppo238	12 - Policy DM11 - Resource Efficiency and High Environmental Standards	Our client welcomes the Council's policy in order to achieve appropriate environmental standards. We consider that the policy should seek to make greater reference to the conformity with the London Plan. We also consider that reference should be confirming the policy will compliment Building Regulations. A degree, of flexibility should be introduced to allow proposals that do not fully meet the policy requirements in all respect to be found acceptable where special circumstances can be justified.	a) Noted. b) We will explore how we can incorporate greater reference to the conformity with the London Plan and Building Regulations in the proposed submission stage. c) Flexibility is incorporated in the policy through the carbon off-set fund: where developments can demonstrate that required targets of carbon reduction cannot be achieved on site, the Council may accept financial contributions in lieu. The Council has recently commissioned a climate change viability assessment and the outcomes and recommendations will be incorporated into the proposed submission stage. Furthermore, paragraph 12.13

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				should be noted, which states that more challenging targets will be tested against issues of site constraints and viability and that the Council will expect developers to make a case on a site by site basis.
Dr Robert Gay	dmppo48	12 - Policy DM11 - Resource Efficiency and High Environmental Standards	I agree that where a householder is applying for an extension to their house or e.g. a loft conversion then the new room(s) should be required to be energy efficient. I think it is wrong that if someone wants to extend their house they should (as a price for planning permission) be required to make alterations to their existing home to make it meet current standards. Victorian terrace houses were not built to be insulated, hermetically sealed against draughts, etc	It should be noted that the Council will not require that the existing building is brought up to current standards, but it will only consider simple and cost effective energy efficiency measures to be carried out to the main building, where appropriate and reasonable . The Council considers it appropriate to take account of the energy efficiency of existing buildings where intensification of use and/or high increase in energy demand justifies such consideration. Precedence for such a policy has been set by Uttlesford District Council in their Energy Efficiency and Renewable Energy SPD. In order for this policy to be found sound, the Council will ensure that the policy is flexible and reasonable and will consider revisiting the wording of the policy accordingly in the proposed submission stage. The next iteration of the document will clarify that measures will not be required for householder extensions.
Dr Robert Gay	dmppo49	12 - Policy DM11 - Resource Efficiency and High Environmental Standards	I object to para 12.16 (see comments on the policy) I also object to para 12.18, with regard to implementation. As I said on another chapter, the procedure for householders applying for extensions should be kept simple and should not involve additional costs. It would be an additional cost to require and Energy Assessment in respect of a simple extension. It should be enough that the extension would be built to meet current Building Regulations.	Regarding paragraph 12.16: The Council considers it appropriate to take account of the energy efficiency of existing buildings where intensification of use and/or high increase in energy demand justifies such consideration. Precedence for such a policy has been set by Uttlesford District Council in their Energy Efficiency and renewable Energy SPD. In order for this policy to be found sound, the Council will ensure that the policy is flexible and reasonable and will consider revisiting the wording of the policy accordingly in the proposed submission stage. The proposed submission will clarify that measures will not be required for

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				householder extensions. Regarding paragraph 12.18: The Council will incorporate a threshold for energy assessments in the proposed submission.
English Heritage (Nicholas Bishop, Regional Planning Advisor - London Region)	dmppo304	12 - Policy DM11 - Resource Efficiency and High Environmental Standards	Policy DM11 Resource Efficiency and High Environmental Standards In general we welcome this policy, however in order for it to comply with PPS5 policy HE1, reference should be made to the need for a balanced approach when developing climate change measures that could have an impact upon the significance of heritage assets. In particular Parts B and F should recognise that where measures are proposed for heritage assets, that its significance is understood as part of the assessment process (part B) and that the implementation of the measures are undertaken where necessary and in a manner that does not cause harm to the significance of the heritage asset (part F). This message should be reflected it he supporting text. The English Heritage web site can help provide further clarity (http://www.climatechangeandyourhome.org.uk/live/).	The Council recognises the significance of heritage assets in the borough and seeks to protect it. The significance of heritage in the context of climate change measures is sufficiently addressed in the Core Strategy. The various LDF documents will need to be read in conjunction and should not repeat the same message. Further, policy DM29 sets out the policies to protect heritage assets and the Council will include a cross reference to policy DM29in the justification of DM11. The Council therefore considers this issue sufficiently addressed and does not consider that further reference will be required in the DM Policies DPD.
Environment Agency (Miss Nancy Young, Planning Liaison Officer)	dmppo120	12 - Policy DM11 - Resource Efficiency and High Environmental Standards	Point D - The document states that solely major developments need to meet CISH Level 4 and BREEAM 'excellent' rating. However, there is no clarification in planning terms as to what is considered to be 'minor' and 'major' development. We consider that all residential and commercial developments should have to comply with these standards. Level 4 of CfSH can be easily achieved with existing technologies with a costs £125 (Water for People and the environment EA 2010) extra per home. We welcome the inclusion of the stated water efficiency policies under Policies DM11 and DM35.	a) The terms minor and major developments are used throughout the document. An explanation will be included in the introduction and/or glossary of the document. b) Agreed. This will be amended in the proposed submission. c) Support noted.
Leyton Orient Football Club and Matchroom Ltd (Agent: Mr Clive Thompson, Director, Woodhall Properties)	dmppo90	12 - Policy DM11 - Resource Efficiency and High Environmental Standards	All of Q11 requires a complete understanding that in seeking a rise in sustainability to Code Level 4 etc may not be economically viable unless seen 'in the round' with affordable policies and the 'tariff' tax if these are in place under a Section 106 agreement.	Noted. The Council has undertaken a climate change viability assessment to ensure that the targets and standards it anticipates to set through this policy are viable in the WF context. The viability assessment forms part of the evidence base and can be downloaded from our webpage. The Council will ensure that climate change related requirements will be considered in light of other requirements, in particular affordable housing and the Council's housing trajectory. The policy incorporates a sufficient level of flexibility

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				and decisions will be made on a case-by-case basis as part of the development management process, talking account of viability considerations where appropriate.
London & Quadrant Housing Trust (Agent: Mr Adrian Kearley, AKA Planning)	dmppo28	12 - Policy DM11 - Resource Efficiency and High Environmental Standards	L&Q support the objectives of Policy DM11	Support noted.
North East London NHS Foundation Trust (Agent: Mark Underwood, Drivers Jonas Deloitte)	dmppo345	12 - Policy DM11 - Resource Efficiency and High Environmental Standards	NELFT agrees that new development should seek to confirm with the prevailing level of environmental policy. However, these standards should be applied flexibility for uses with high energy consumption needs such as hospitals and other health care uses.	The policies seek to address a carbon reduction through energy efficiency of building and, where appropriate, supply of energy through decentralised energy and renewable energy. Uses with high energy consumption are in particular encouraged to connect to Decentralised Energy where feasible and/or incorporate a CHP system. This will ensure a cost efficient energy supply for the uses in addition to carbon emission reduction. As highlighted in paragraph 12.13 the Council will consider the more challenging targets on a case by case basis. The Council acknowledges that certain uses such as hospitals may need to be judged on a case by case basis; the Council would welcome early discussions with potential developers on this as part of the pre-application discussions.
Thames Water Property (Carmelle Bell)	dmppo215	12 - Policy DM11 - Resource Efficiency and High Environmental Standards	The inclusion of Policy DM11 within the Development Management Policies DPD is supported and in particular as this relates to the objective of minimising the use of water. Thames Water considers that all new dwellings should meet the water usage targets set out in the Code for Sustainable Homes Code 3 rating as a minimum. The requirement under Policy DM11 for new major developments to achieve at least a Code Level 4 rating is also supported, however we believe that consideration should be given to applying this standard to all new development (rather than only major developments).	a) Noted. b) Agreed. This will be incorporated in the proposed submission.
The Greater London Authority (Giles Dolphin, Planning	dmppo250	12 - Policy DM11 - Resource Efficiency and High	11 On the whole Policies DM11 and DM12 address the energy hierarchy. However Policy DM11 should reference the targets in Policy 5.2 of the draft replacement London Plan for non-	Agreed. This will be incorporated in the proposed submission.

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Decisions Unit)		Environmental Standards	domestic buildings. This should specifically be included in the policy and not just part of the justification text.	
The Mall Limited Partnership (Agent: Miss Marie Jasper, Associate Barton Willmore)	dmppo126	12 - Policy DM11 - Resource Efficiency and High Environmental Standards	Policy DM11 sets out the Council's requirement in relation to resource efficiency and high environmental standards. Part D states that the Council will require major developments to achieve at least Code Level 4 and BREEAM "excellent". While we agree that high environmental standards should be encouraged by the planning process, compliance with standards such as those required by BREEAM and Code for Sustainable Homes are dealt with under Building Regulations. Therefore It should be noted that PPS1 Delivering Sustainable Development states the following:" .... Planning policies should not replicate, cut across, or detrimentally affect matters within the scope of other legislative requirements, such as those set out in Building Regulations for energy efficiency. '" (Paragraph 30) Furthermore we note that the Inspectors Report in relation to the Poole Core Strategy required the deletion of locally based carbon reduction requirements in order for the Core Strategy to be found sound. Accordingly Policy DM11 Part D should be deleted from the Development Management Policies DPD.	a) The Council anticipates to set standards in accordance with national and London Plan standards and targets. The targets in the emerging DM policies are consistent with the Building Regulations trajectory towards achieving zero carbon. The Council will ensure that the proposed submission clearly references the relationship of the standards with London Plan and Building Regulations. The Codes/BREEAM go further than the current building regulations in that they cover a more comprehensive list of sustainability criteria. The Council intends to achieve high standards of sustainable design (beyond the energy requirements of the Building Regulations) across the range of criteria that are covered in the Codes and BREEAM (Energy/CO2, Water, Materials, Surface Water Runoff, Waste, Pollution, Health and Well-being, Management and Ecology). b) The Council notes the reference to the Poole Core Strategy. However, the Council understands from the Inspectors Report that Poole Borough Council anticipated to accelerate carbon reduction targets (in comparison to the national framework) and that no work had been carried out locally on the viability and deliverability implications of the additional costs involved. Contrary to Poole Borough Council, Waltham Forest Council does not set carbon reduction targets that are different from national/London Plan targets (note that the targets are set in the Development Management DPD). By referencing the Codes for Sustainable Homes and BREEAM targets, the Council anticipates that wider sustainability aspects of buildings are taken into consideration. It should further be noted that the Council has

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				recently undertaken a study on the local viability of climate change targets and the outcomes and recommendations of the study will be incorporated in the proposed submission.
The Olympic Delivery Authority (Alex Savine, Chief Planner, Policy and Relationships)	dmppo57	12 - Policy DM11 - Resource Efficiency and High Environmental Standards	Part B states that “applications for new developments” are required to be submitted with an Energy Assessment - what is the threshold for the minimum development size? Part C mentions a “carbon offset fund” and at 12.14/12.17, is this to be used for retrofitting only and not for new borough renewable measures for example? It seems rather an artificial split in the sustainability topic (and Strategic Objective 5) to not have policy DM35 in this area, or at least to mention water use reductions here. It is recommended that Policy DM11 is extended to include reference to other areas of sustainable design such as water use, sustainable drainage.	a) A threshold will be incorporated in the next iteration of the document. b) The exact terms of a future carbon off-set fund have not yet been determined. c) Cross references will be included.
UK Power Networks (Operations) Ltd (Agent: Annie Pang, ADRIAN SALT AND PANG)	dmppo321	12 - Policy DM11 - Resource Efficiency and High Environmental Standards	Policy DM11 (D) add "subject to affordability and viability".	Please note paragraph 12.10 which states that the Council will accept rating below these targets where developers can present robust evidence that and why a higher rating is not viable for their development. It should further be noted that the Council has recently undertaken a viability assessment of its viability targets to inform the appropriate targets of the climate change policies. The outcomes of this study will be incorporated in the proposed submission.
Waaltham Forest Primary Care Trust (Adrian Poynter)	dmppo385	12 - Policy DM11 - Resource Efficiency and High Environmental Standards	Item 12.2 we thought was 80% by 2050	Agreed. This will be amended in the Proposed Submission.
Workspace Group (Agent: Andrew Ransome, Director Ransome and Company Ltd)	dmppo208	12 - Policy DM11 - Resource Efficiency and High Environmental Standards	Workspace objects to the Sustainable Code Level, EcoHomes and BREEAM requirements set out in Policy DM11 on the basis that significant changes to national policy result in this policy not being necessary. There have been significant changes to the legislative and policy framework through the Climate Change Act, the Low Carbon Transition Plan and Renewable Energy Strategy and amendments to Part L of the Building Regulations, which demonstrates the Government’s ambitions on reducing carbon emissions and delivering	a) The Council anticipates to set standards in accordance with national and London Plan standards and targets. The targets in the emerging DM policies are consistent with the Building Regulations trajectory towards achieving zero carbon. The Codes/BREEAM go further than the current building regulations in that they cover a more comprehensive list of sustainability

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			renewable energy. The Climate Change Act 2008 introduced a statutory target of reducing carbon emissions by 80 percent below 1990 levels by 2050, with an interim target of 34% by 2020. These ambitions are in the process of being reflected in the national planning framework and through building regulations. It is considered that the current London Plan (2004 consolidated with changes), the emerging draft London Plan (2009) and Part L of the Buildings Regulations will provide sufficient policy cover. Furthermore, Workspace considers that if such requirements are to incorporated they should be considered on a site-by-site basis. PPS1 states that local planning authorities should ensure that development plans should address potential impacts upon climate change including through policies which seek to reduce energy use and energy emissions and promote the development of renewable energy resources. The advice in PPS1 has been clarified and developed further through the publication of 'Planning and Climate Change' a supplement to PPS1. Under the heading 'Testing Local Requirements' paragraph 33 of the climate change supplement advises that any policy relating to local requirements for energy supply should ensure what is proposed is evidenced based and viable having regard to overall costs of bring sites to the market. In the case of housing development, it is stated that the policy approach should demonstrate that the proposed approach is consistent with securing the expected supply and pace of development shown in the housing trajectory required by PPS3 and does not inhibit the provision of affordable housing.	criteria. The Council intends to achieve high standards of sustainable design (beyond the energy requirements of the Building Regulations) across the range of criteria that are covered in the Codes and BREEAM (Energy/CO2, Water, Materials, Surface Water Runoff, Waste, Pollution, Health and Well-being, Management and Ecology). The Council has undertaken a viability assessment to determine the appropriate CsH/BREEAM standards in the light of local requirements and viability and the outcomes and recommendations of the study will be incorporated in the proposed submission. It should further be noted that, as highlighted in paragraph 12.13, the Council will consider the more challenging targets on a case-by-case basis. b) Noted. The Council has undertaken a climate change viability assessment to ensure that the targets and standards it anticipates to set through this policy meet local requirements are viable in the WF context. The viability assessment forms part of the evidence base and can be downloaded from our webpage. The housing trajectory and the provision of affordable housing are important aspects of the LDF documents and the Council will ensure that these will not be jeopardised. Policy DM11 and 12 incorporate a sufficient level of flexibility (for instance through financial contributions where targets cannot be met) and decisions may be made on a case-by-case basis as part of the development management process, talking account of viability considerations where appropriate.
Aviva Life and Pensions UK Ltd (Agent: Sarah Dawson, Associate	dmppo378	13 - Policy DM12 - Decentralised and Renewable Energy	Our client welcomes the Council's policy in order to achieve appropriate environmental standards. We consider that the policy should seek to make greater reference to the conformity with the London Plan. We also consider that reference should	a) Agreed. The Council will ensure that the proposed submission clearly references the relationship of the standards with London Plan and Building Regulations (note that

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Barton Willmore)			be confirming the policy will compliment Building Regulations. A degree of flexibility should be introduced to allow proposals that do not fully meet the policy requirements in all respect to be found acceptable where special circumstances can be justified.	this will be addressed as part of policy DM11 rather than DM12). b) Flexibility will be provided though financial contributions (policy DM11C and DM12E), where a developer can demonstrate that the targets cannot be fully met. It should be noted that the Council has undertaken a climate change viability assessment to ensure that the targets and standards it anticipates to set through this policy meet local requirements are viable in the WF context. The viability assessment forms part of the evidence base and can be downloaded from our webpage. As highlighted in paragraph 12.13 the Council will consider the more challenging targets on a case by case basis. The Council also acknowledges that special circumstances may prevent developers from meeting the required targets. The Council would therefore welcome early discussions with potential developers as part of the pre-application discussions.
Dr Robert Gay	dmppo51	13 - Policy DM12 - Decentralised and Renewable Energy	I do not support what would in effect be a tax on development	Noted. The Council does not anticipate to tax developments. The policy seeks to achieve mandatory national and London Plan targets. Where these targets cannot be achieved on site, the policy provides flexibility to carbon reduction measures to be implemented off-site through financial contributions (carbon off-set fund) or for contributions from numerous developments to be pooled to support large infrastructure such as a Decentralised Energy network, which would allow a more efficient supply of energy. The Council has undertaken a viability assessment, which indicates that this is a cost-effective way that contributes to viable developments whilst achieving carbon reduction across the borough.
Dr Robert Gay	dmppo50	13 - Policy DM12 - Decentralised and	with regard to para 13.9, it sounds to me as if biomass should not be encouraged at all	The whole borough is an air quality management area and the Council will

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		Renewable Energy		carefully assess proposals incorporating biomass with regards to potential negative impacts on air quality. The policy seeks to allow sufficient flexibility for a 15 year time horizon. Where technology types and potential future technology advances (with regards to filters and/or combustion processes etc.) can demonstrate that air quality impacts can be minimised, biomass may in the future become a favourable option.
English Heritage (Nicholas Bishop, Regional Planning Advisor - London Region)	dmppo305	13 - Policy DM12 - Decentralised and Renewable Energy	Renewable Energy (13.10) The impacts of micro generation renewables on the historic environment should also betaken into account, as required by Planning Policy Statement 5, policy HE1, for example, harm to historic fabric or character.	The Council recognises the significance of heritage assets in the borough and seeks to protect it. The significance of heritage in the context of climate change measures is sufficiently addressed in the Core Strategy CS4. The various LDF documents will need to be read in conjunction and should not repeat the same message. Further, policy DM29 sets out the policies to protect heritage assets and the Council will include a cross reference to policy DM20 in the justification of DM11. The Council considers this issue sufficiently addressed and does not consider that further reference will be required in the DM Policies DPD.
Environment Agency (Miss Nancy Young, Planning Liaison Officer)	dmppo121	13 - Policy DM12 - Decentralised and Renewable Energy	13.10 - It may be worth mentioning here that open loop ground source heating and cooling may be subject to abstraction licensing process. Where Ground source heat pumps are proposed, developers should be encouraged to find a recipient for the waste heat.	Ground source heat pumps are usually closed loop, so there would be no need for a licence. An extraction licence would only be needed, if water is extracted from the ground to supply low grade heat to the heat pump. Developer would be required to use the heat from the heat pumps within the development (and will be required to do so as part of meeting the carbon reduction targets), yet it is unlikely that there would be any spare heat for use elsewhere. A reference to recipient for the waste heat is therefore not considered necessary.
Leyton Orient Football Club and Matchroom Ltd (Agent: Mr Clive	dmppo91	13 - Policy DM12 - Decentralised and Renewable	Same qualifications as Q11 in regard to economic viability to retain a continuity of housing supply.	Noted. See response to Q11 (See dmppo90)

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Thompson, Director, Woodhall Properties)		Energy		
North East London NHS Foundation Trust (Agent: Mark Underwood, Drivers Jonas Deloitte)	dmppo346	13 - Policy DM12 - Decentralised and Renewable Energy	NELFT agrees that new development should seek to confirm with the prevailing level of environmental policy. However, these standards should be applied flexibility for uses with high energy consumption needs such as hospitals and other health care uses.	The policies seek to address a carbon reduction through energy efficiency of building and, where appropriate, supply of energy through decentralised energy and renewable energy. Uses with high energy consumption are in particular encouraged to connect to Decentralised Energy where feasible and/or incorporate a CHP system. This will ensure a cost efficient energy supply for the uses in addition to carbon emission reduction. The Council acknowledges that certain uses such as hospitals may need to be judged on a case by case basis; the Council would welcome early discussions with potential developers on this as part of the pre-application discussions.
The Greater London Authority (Giles Dolphin, Planning Decisions Unit)	dmppo252	13 - Policy DM12 - Decentralised and Renewable Energy	Policy DM12 is in line with the decentralised energy policies in the London Plan.	Support noted.
The Olympic Delivery Authority (Alex Savine, Chief Planner, Policy and Relationships)	dmppo58	13 - Policy DM12 - Decentralised and Renewable Energy	a) Page 62 - There may be benefit in mentioning, either in the policy or justification section, the heat and energy network within the Olympic Park, so that developers are aware of this asset and the potential for the linkage of future major developments to this network can be considered. b) Section 13.10 - The inclusion of passive solar design within the list of renewable energy sources should be qualified or removed as this is not a sources of renewable energy generation but rather of building design and energy efficiency. c) It is noted that wind turbines are not referenced in this list. Is this exclusion a matter of policy for all parts of the Borough or would wind turbines be considered in appropriate locations? Consideration should be given to inclusion of wind turbines in this list.	a) Agreed. This will be incorporated in the proposed submission. b) Agreed. This will be incorporated in the proposed submission. c) Agreed. Wind turbines will be added in the proposed submission. It should be noted that the Council's Climate Change Evidence Base Study highlighted that wind patterns in the borough are unlikely to be suitable for wind turbines, however, the Council is not opposed to wind turbines where it can be demonstrated that they are feasible.
Workspace Group (Agent: Andrew Ransome, Director Ransome and Company Ltd)	dmppo209	13 - Policy DM12 - Decentralised and Renewable Energy	Workspace objects to Policy DM12 as it does not demonstrate sufficient flexibility and has not satisfactorily considered the viability and feasibility of new developments. Paragraph 33 of the PPS1 climate change supplement advises that any policy relating to local requirements for energy supply should ensure what is proposed is evidenced based and viable having regard	The Council has undertaken a climate change viability assessment to ensure that the targets and standards it anticipates to set through this policy meet local requirements are viable in the WF context. The viability assessment forms part of the

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			to overall costs of bring sites to the market.	evidence base and can be downloaded from our webpage. Policy DM11 and 12 incorporate a sufficient level of flexibility (for instance through the carbon offset fund, where a development can demonstrate it cannot meet the required targets) and decisions may be made on a case-by-case basis as part of the development management process (see paragraph 12.13), talking account of viability considerations where appropriate.
City of London (Paul Thomson, Superintendent of Epping Forest)	dmppo75	14 - Policy DM13 - Open Space, Sport and Recreation	In addition to sub-policy G) there should also be a clear sub-policy for DM13 on Epping Forest which could read: Ensuring no adverse impacts on amenity, ecological integrity or visitor enjoyment of Epping Forest and delivering enhancements where possible and in line with national policy to enhance biodiversity	Noted. A new policy will be created to recognise the importance of Epping Forest.
CPRE North East London (Mr John Gilbert, Secretary)	dmppo13	14 - Policy DM13 - Open Space, Sport and Recreation	E) In the context of allotments, the meaning of 'intensification' needs clarifying. G) No buildings taller than 3-4 storeys should be permitted next to the Lee Valley Regional Park.	E) Noted. Comment on the need to explain the term 'intensification' will be clarified in the DM Policies Proposed Submission. G) The Council will assess the height of buildings in line with Core Strategy policy CS15 and Development Management policy DM32.
English Heritage (Nicholas Bishop, Regional Planning Advisor - London Region)	dmppo306	14 - Policy DM13 - Open Space, Sport and Recreation	Open Space, Sports and Recreation (Policy DM13) Many of the Borough's open spaces have intrinsic heritage value which should be protected as part of their character. To reflect this, we suggest altering point B) to read: "Development proposals affecting an open space must not adversely affect, and where possible enhance: the inherent character and heritage value of the space." The heritage values of open spaces should then be identified in paragraph 14.8 of the supporting text.	Noted and will be incorporated in the DM Policies Proposed Submission.
New Lammas Lands Defence Committee (Ms Katy Andrews, Planning Liaison Officer)	dmppo282	14 - Policy DM13 - Open Space, Sport and Recreation	Developments aimed at providing recreational facilities must not detract from the open aspect or character of existing open spaces, nor adversely impact on opportunities for informal recreation or exercise	Noted.
Rapleys (Anthony Pharoah, Senior Planner)	dmppo16	14 - Policy DM13 - Open Space, Sport and Recreation	We generally agree with the Council's assertion that development within the Green Belt should be implemented to a high standard of design and that it must not adversely affect the character, access and biodiversity value of open spaces. In preparing the Core Strategy, the Council rightly refers to the	The Council considers that it is appropriate that the site is located in the Green Belt. The Council will not be undertaking a strategic review of Green Belt or Metropolitan Open Land in the Borough in

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			guidance in PPG2, which sets out the purpose of land being included in the Green Belt. However, if land is currently in the Green Belt and does not meet any of the PPG2 criteria, an alternative use should be welcomed, and the policy should reflect this. 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 Core Strategy and Site Allocations DPD, we consider that it should be removed from the Green Belt (in addition to its designation for 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. These are: 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 a more sympathetic relationship with the Green Belt (i.e. one 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	the near future. The SHLAA and the Employment Land Study identified that there is sufficient land for meeting the associated targets for housing and employment. This is articulated in the Core Strategy Proposed Submission document

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			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 this is the case with this site, as it is not central to the Council Playing Field provision or its future strategy for open space. Further, 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 to the proposed employment policies (and wider Council objectives for the Borough) as set out in the Core Strategy.	
The Olympic Delivery Authority (Alex Savine, Chief Planner, Policy and Relationships)	dmppo59	14 - Policy DM13 - Open Space, Sport and Recreation	No mention is made of the new sports facilities, especially those in the Olympic Park including those at Eton Manor, making these accessible to the local community, and improving connectivity with walking and cycling links to them. Reference in part E of the policy to the positive role of allotment provision and other food growing opportunities is welcomed, particularly in the context of the approved re-provision of allotments within the Olympic Park, including those permitted for Eton Manor for the Olympic Park Post Games Transformation phase. Page 70 - Suggest that a sentence could be added to encourage the developing sports uses at Eton Manor, such as LVRPA's proposal for a five-a-side football venue.	Noted and will make amendment in the justification section of DM13 in the DM Policies Proposed Submission.
Dr Robert Gay	dmppo53	14 - Policy DM13 - Open Space, Sports and Recreation	I support paragraph 14.17, and the last sentence of para 14.19	Support noted.
Lee Valley Regional Park Authority (Mr Stephen Wilkinson, Head of Planning and Regeneration)	dmppo78	14 - Policy DM13 - Open Space, Sports and Recreation	The Authority supports the inclusion of the Lee Valley Regional Park within policy DM13 Open Space, Sport and Recreation and the supporting text under paragraph 14.11. Minor amendments are however needed to strengthen Policy DM13 to add and remove text as follows (new text in bold): The Lee	Noted and will be incorporated into the next version of the document.

Name/ Organisation	Comment ID	Chapter	Comments from Consultee	Council's Response
			Valley Regional Park Change of wording to: G) Development proposals affecting the Lee Valley Regional Park must not contribute to adverse impacts on amenity, ecological integrity or visitor enjoyment of the Park; and will be expected to deliver enhancements, including to and through the Park for pedestrians and cyclists.	
The Greater London Authority (Giles Dolphin, Planning Decisions Unit)	dmppo259	15 - Figure 15.1 - Public Transport Accessibility Levels	Figure 15.1 - The reference to Leyton High Road station on TfL's over ground network should be amended to read Leytonstone High Road. For clarification, Walthamstow rail & underground station should be referred to as Walthamstow Central and reference to St James' Street is omitted.	Agreed. This will be amended in the proposed submission.
Dr Robert Gay	dmppo52	15 - Policy DM14 - Co-ordinating Land use and Transport	If I follow what is meant by 'enhancing connectivity across the borough', I do not support it. What matters to Leytonstone is its transport links to Stratford and into Central London. I am glad of the Barking to Gospel Oak Line, but really it does not matter much to people in Leytonstone how easy it is to get to Walthamstow or to Chingford	While the Council acknowledges the importance of radial connections, the Council also considers orbital routes as a high priority, as they are equally important for many residents in the borough. The Council therefore seeks to improve connectivity of both radial and orbital routes within the borough and beyond to improve peoples access to jobs and facilities.
GL Hearn Planning (Emma Beardmore)	dmppo330	15 - Policy DM14 - Co-ordinating Land use and Transport	It is considered that the wording of criterion a) requiring transport assessments and travel plans to include consideration of impacts on european sites, is ambiguous. The supporting text does not provide clarification or justification in respect of this requirement.	Agreed. The policy will be amended and further explanation will be included in the justification in the proposed submission.
Highways Agency (Mr Patrick Blake)	dmppo296	15 - Policy DM14 - Co-ordinating Land use and Transport	The HA support Waltham Forest's approach to align land-use and transport policies. In our previous response at Issues & Options stage (30 April 2010), the HA highlighted that, where services and facilities are planned, development in these areas should be correctly phased in line with infrastructure in order to ensure that unsustainable trip patterns are not established due to the inaccessibility or lack of capacity of sustainable transport options. The HA are pleased to note that this requirement is set out within the policy and is in line with the Core Strategy.	Support noted.
Leyton Orient Football Club and Matchroom Ltd (Agent: Mr Clive Thompson, Director, Woodhall Properties)	dmppo93	15 - Policy DM14 - Co-ordinating Land use and Transport	All of the above needs to have regard to the qualifications made in Q11 as to economic viability holding the key to all the requirements under tariffs, affordable housing and sustainability.	The Council is keen to ensure that proposed developments address transport impacts and improve connections where appropriate. Applicants will need to confirm the appropriate levels of detail for Transport Assessments with the Council. This will be determined with consideration of the type and nature of development and location and

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				the likely traffic impact arising from proposed developments. Our emerging Sustainable Transport SPD will provide further guidance and information on this in due course. The Council recommends that applicants should arrange pre-applications discussions with the Council as early in the process as possible to discuss potential traffic impacts and suitable mitigation measures.
New Lammas Lands Defence Committee (Ms Katy Andrews, Planning Liaison Officer)	dmppo283	15 - Policy DM14 - Co-ordinating Land use and Transport	The same proviso should equally apply to areas within, and within 200m of, the boundary of the Lee Valley Regional Park (and to Marsh Lane and Seymour Fields). We would prefer the policy to be for 'no development at all' rather than allowing development on the spurious basis that it will not lead to an increase in 'access' to private cars	Policy 14H) will be amended and further explanation will be included in the justification in the proposed submission. The HRA has identified that the Lee Valley Regional Park and its habitats are less sensitive to air quality impacts compared to Epping Forest SAC. Therefore, there is no requirement for a similar strict policy to protect Lee Valley Regional Park. The Council does, however, anticipate to minimise negative impacts on Lee Valley Regional Park (and other open spaces), in particular through requirements set out in policy DM 25 Environmental Protection and DM 26 Biodiversity and the requirement for Environmental Impact Assessments (EIA) in support of planning applications as part of the Development Management process. EIA assess the impacts of developments on nature and environment and need to identify mitigation measures to minimise potential negative impacts.
The Greater London Authority (Giles Dolphin, Planning Decisions Unit)	dmppo257	15 - Policy DM14 - Co-ordinating Land use and Transport	TfL supports the requirement to prepare a transport assessment for major development proposals. The policy should refer to TfL's Transport assessment best practice guidance 2010. In addition to the submission of a travel plan, Construction Logistics Plans and Delivery and Servicing Plans should be secured in line with the London Freight Plan and should be coordinated with Travel Plans.	a) Please note that TfL's Transport assessment best practice guidance 2010 is mentioned in paragraph 15.7 b) Agreed. This will be amended in the proposed submission.
The Olympic Delivery Authority (Alex Savine, Chief Planner,	dmppo60	15 - Policy DM14 - Co-ordinating Land use and	Policy DM14, point E, and sections 5.10-5.12 - Suggest that travel plans are required at construction phase for major developments as well as occupation phase. Mention should be	a) Agreed. This will be amended in the proposed submission. b) Sustainable freight is mentioned in CS7 J) and the Council will

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Policy and Relationships)		Transport	made to the sustainable transport of construction materials (by rail or water), and construction transport management plans also being considered for major developments.	therefore not repeat this policy in the DM DPD. c) Agreed. This will be amended in the proposed submission.
Workspace Group (Agent: Andrew Ransome, Director Ransome and Company Ltd)	dmppo210	15 - Policy DM14 - Co-ordinating Land use and Transport	Workspace supports DM14 and specifically Part A, which promotes mixed-use developments and development in locations that minimise the need to travel.	Support noted.
Lee Valley Regional Park Authority (Mr Stephen Wilkinson, Head of Planning and Regeneration)	dmppo79	16 - Policy DM15 - Sustainable Transport Network	a) The Authority welcomes policy DM15 Sustainable Transport Network. The Authority's previous comment about the need to secure contributions to cross borough sustainable transport projects such as the Lee Valley Pathway and Green Grid projects should be included within this Policy. b) The Authority's draft area proposals for the Lea Bridge Road area seek to encourage substantial access improvements into and through the Park particularly in relation to cross valley routes. An addition is suggest to Policy DM15 B so that it reads: B) Requiring new developments to provide convenient, accessible safe and well designed walking and cycling routes and facilities both within development and connecting to adjacent neighbourhood and by encouraging developer contributions towards the delivery and enhancement or cross borough sustainable transport projects.	a) The Authority's previous comment has been incorporated in paragraph 16.8 through the reference of "improvements to the borough's pedestrian and cycle infrastructure ..... including local and/or strategic improvements". Given that the document is an overarching policy document and rather than site specific or an implementation plan, the Council will not include reference to specific projects. This will allow the Council more flexibility over the lifetime of the policy document (15 years). Please note that the Council is also preparing a Local Implementation Plan (LIP) which includes a list of transport projects and the Council considers this document more suitable to reference potential future transport infrastructure projects. b) Agreed. The policy will be amended in the proposed submission to read " ... and by encouraging developer contributions towards the delivery and enhancement of local and strategic sustainable transport projects"
New Lammas Lands Defence Committee (Ms Katy Andrews, Planning Liaison Officer)	dmppo284	16 - Policy DM15 - Sustainable Transport Network	Cycling and walking can be encouraged by providing a pleasant environment where people feel safe. (This can not be achieved in or beside a massive high-rise development, which many people find psychologically intimidating).	Noted.
North East London NHS Foundation Trust (Agent: Mark Underwood, Drivers Jonas Deloitte)	dmppo349	16 - Policy DM15 - Sustainable Transport Network	In respect of part f) of the proposed policy, while NELFT agrees that such contributions could be requested, these should be determined at an appropriate level on a site-by-site basis.	Agreed. The Council will seek appropriate levels of contributions subject to the type and nature of development and location and the likely traffic impact arising from proposed developments (as determined

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				through the transport assessment).
The Greater London Authority (Giles Dolphin, Planning Decisions Unit)	dmppo261	16 - Policy DM15 - Sustainable Transport Network	For clarification, reference to high quality stops in section F could be amended to read ' ensure direct, secure, accessible and pleasant walking routes to stops and implement TfL's Accessible Bus Stop Design Guidance' TfL suggests that this policy could be strengthened by reference to sustainable freight. Whilst para 16. 3 mentions servicing vehicles within a road user hierarchy, this principle should be embedded in the policy itself. TfL therefore suggests that the policy could require new developments to minimise the impact of freight through the submission of Construction Logistics Plans and Delivery & Servicing Plans, the promotion of the uptake of the Freight Operators Recognition Scheme and where appropriate the transfer of freight to rail and water. As stated above, These measures should be secured in line with the London Freight Plan and should be coordinated with Travel Plans.	a) Agreed. This will be incorporated in the proposed submission. b) Agreed. This will be addressed in policy DM 14 (as opposed to DM 15), in line with the representation dmppo259.
The Olympic Delivery Authority (Alex Savine, Chief Planner, Policy and Relationships)	dmppo61	16 - Policy DM15 - Sustainable Transport Network	Suggest reference is made to accessible cycle parking (such as tricycles) which can take up more room than standard cycles.	Noted. This too specific an issue to be incorporated into this document.
The Greater London Authority (Giles Dolphin, Planning Decisions Unit)	dmppo263	17 - Policy DM16 - Managing Private Motorised Transport	Whilst TfL supports policies to create a high quality public realm and to balance the needs of different road users they should be worded to ensure that where appropriate the bus network is promoted, and for clarification it should state that the allocation of road space will ensure good access to the bus network, now and in future. For clarification, it may be appropriate to state that the TLRN is the Transport for London Road Network.	a) Agreed. The Council is keen to promote and facilitate the provision of the bus network and bus priority measures and will amend the policy accordingly. b) Agreed.
London & Quadrant Housing Trust (Agent: Mr Adrian Kearley, AKA Planning)	dmppo29	18 - Policy DM17 - Parking	L&Q support Policy DM17 and the proposed maximum parking standards. L&Q understand that the requirement in criterion D to provide an electrical charging point for one in five parking spaces is a GLA standard. However, we would wish to see further independent research into future demand for electric vehicles within the local area to justify such a policy requirement.	Waltham Forest Council is required to set policies in line with the London Plan. The Council supports the provision of charging points and does not anticipate to undertake any research into future demand for electric vehicles.
London Fire & Emergency Planning Authority (Agent: Nick Taylor, Drivers Jonas Deloitte)	dmppo380	18 - Policy DM17 - Parking	The LFB supports Policy DM 17, which seeks to effectively manage parking within Waltham Forest. The LFB supports Point C which requires off-street parking to be designed to incorporate safety and security measures. The LFB also supports paragraph 18.5 where the council seeks to ensure	Support noted.

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			that indiscriminate parking does not become a hindrance to traffic in busy streets or result in safety or access problems. The LFB considers off-street parking as a considerable problem to vehicle access and welcome the strict design and regulation of such spaces. The LFB also notes and supports paragraph 18.12, which is concerned with on-street parking and states that it is essential that opportunities to park in inappropriate locations need to be minimised by the design of streets.	
New Lammas Lands Defence Committee (Ms Katy Andrews, Planning Liaison Officer)	dmppo285	18 - Policy DM17 - Parking	Can a policy be adopted to stop the grubbing-up of front lawns and gardens to provide hard standing for vehicles? This has effects on rainwater run-off as well as contributing to the 'urban heat island' effect. We need all the green, open space we can get!	The Council agrees that hard standing for vehicles should be minimised and will investigate how to best incorporate this into the policy.
The Greater London Authority (Giles Dolphin, Planning Decisions Unit)	dmppo264	18 - Policy DM17 - Parking	TfL welcomes the reference to electrical charging points. It is suggested however, that development should provide 1 in 5 spaces both active and passive, rather than just active.	Agreed. This will be amended in the proposed submission.
The Olympic Delivery Authority (Alex Savine, Chief Planner, Policy and Relationships)	dmppo62	18 - Policy DM17 - Parking	Policy DM17 refers to minimising the urban heat island for parking, but this does not seem to be mentioned for the wider design policies.	Agreed. This will be amended in the proposed submission.
Waaltham Forest Primary Care Trust (Adrian Poynter)	dmppo384	18 - Policy DM17 - Parking	We would like more on electric charging points for vehicles.	Noted.
Aviva Life and Pensions UK Ltd (Agent: Sarah Dawson, Associate Barton Willmore)	dmppo239	19 - Policy DM18 - Social Infrastructure	We consider that this policy should make reference to Circular 05/05 Planning Obligations and the Community Infrastructure levy in securing necessary infrastructure and facilities.	Point (e) of Section (C) of DM18 refers to New social Infrastructure provision. It states that considerations for social infrastructure provision will include a need to comply with all other policies in the Development Plan Document. This includes Planning Obligations contribution for Social and Community Infrastructure.
GL Hearn Planning (Emma Beardmore)	dmppo331	19 - Policy DM18 - Social Infrastructure	It is considered that the supporting text as set out in paragraph 19.2 should be amended to omit public houses as social infrastructure as this definition would be out of keeping with the classification of public houses under the use class order. It more appropriate to consider such uses within the context of town centre uses as such facilities are commercial operations and it is not appropriate to apply the same planning policy	Public Houses can be the heart and soul of a community, providing meeting places, entertainment venues etc. That is why public houses are included in the definition of Social Infrastructure. Local pubs have been shown to be most vulnerable in the economic downturn as communities are hit

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			considerations as the other uses within this category. Accordingly paragraph 19.24 should be omitted. It is not appropriate for planning policy to prohibit a change of use of such a unit which would result in the delivery of sustainable development.	by the fallout of the economic downturn. This policy seeks to manage the loss of pubs in the interest of local amenity.
Her Majesty's Court Service (Agent: Miss Charlotte Handscomb, DPP LLP)	dmppo133	19 - Policy DM18 - Social Infrastructure	To ensure this document corresponds with the Core Strategy, our assertions as set out above should be carried through within this document. As such, HMCS should be included within the list of 'social infrastructure', as defined within paragraph 19.2 Flexibility is also sought within planning policy to enable HMCS to adapt its court estate as required to ensure appropriate service delivery: whether this be for instance through court extension, relocation, additional sites, etc. As such, we support Policy DM18 which seeks to resist the loss of social infrastructure facilities, unless there is not a resultant shortfall in provision, adequate replacement facilities are provided, or there is no longer a requirement for the facility.	Suggestion to include Her Majesty's Court Service (HMCS) would be considered in the proposed submission.
Leyton Orient Football Club and Matchroom Ltd (Agent: Mr Clive Thompson, Director, Woodhall Properties)	dmppo97	19 - Policy DM18 - Social Infrastructure	Extra housing across all district boundaries must have regard to the provision of health care particularly on the Waltham Forest/ Newham borders. The west area of Leyton is only served from one location the facility within the undercroft of LOFC west stand. There will be need for more.	Comment noted. Suggestion would be considered at the proposed submission stage.
North East London NHS Foundation Trust (Agent: Mark Underwood, Drivers Jonas Deloitte)	dmppo352	19 - Policy DM18 - Social Infrastructure	NELFT agrees that sufficient and appropriate social infrastructure is required to support LBWF's growing population. However, in respect of healthcare in particular, NELFT considers that flexibility should be applied to resisting loss of social infrastructure. This is particularly true of NHS services where the capital from the disposal of redundant sites can be used to strengthen and improve existing services in other locations. This is particularly true of the Stoneleal Thornebury Day Centre premises which are unsuitable for the provision of mental healthcare services in the context of current national healthcare standards. This should therefore be taken into consideration where proposals involving the loss of social infrastructure are brought forward. This is a particularly important consideration given the current pressure for efficiency saving in the public sector, which are set out in the Government White Paper "Equity and Excellence: Liberating the NHS" (July 2010). NELFT agrees that it is important for new development to be supported by adequate social infrastructure. However, care needs to be applied to the wording of this policy to ensure that the future priorities of interested parties are not	Comments noted. Policy DM18 provides a set of criteria including the justification for the loss of social infrastructure. So that application for the loss of social infrastructure can be considered.

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			disadvantaged or restricted. This is particularly pertinent in respect of NHS healthcare facilities. There are national pressures on local trusts to rationalise their estates where possible. This may mean that although some sites may be redeveloped or partially/completely sold off, it will provide trusts with capital to improve and upgrade service provision elsewhere.	
North East London NHS Foundation Trust (Agent: Mark Underwood, Drivers Jonas Deloitte)	dmppo377	19 - Policy DM18 - Social Infrastructure	NELFT is, on the whole, supportive of the policies set out in this document. However, NELFT seeks further clarity in a number of areas. In particular, NELFT is concerned that Policy DM18 does not allow sufficient flexibility to allow estate rationalities within public bodies such as the NHS. Pressures for efficiency savings and reduced management costs are pioneered by the government white paper "Equality and Excellence: Liberating the NHS" (July 2010). As such, the sale of redundant underused sites is an incredibly important element of efficiency savings, and this policy should take greater account of the need for their flexibility.	Comments noted. Policy DM18 provides a set of criteria including the justification for the loss of social infrastructure. So that application for the loss of social infrastructure can be considered.
Save Our Stow (Mr David Cunningham, Member)	dmppo32	19 - Policy DM18 - Social Infrastructure	The Save Our Stow team, who are campaigning for the retention of greyhound racing at the historic stadium strongly endorse the protection these policies may afford the Stadium site. Specific mention of the greyhound stadium would be welcomed.	Comments noted. Regarding Walthamstow Stadium, the Council in June 2011 received a planning application (Ref. 2011/0898) for a mixed-use development comprising leisure use, community allotment, 301 new dwellings, children's nursery, café, crèche, public open space, associated parking, landscaping and de-culverting of the River Ching. The application was considered by the Planning Committee in May 2012. Members resolved to grant the proposal, subject to conditions, referral to the Greater London Authority and completion of the s106 Agreement.
The Olympic Delivery Authority (Alex Savine, Chief Planner, Policy and Relationships)	dmppo63	19 - Policy DM18 - Social Infrastructure	Page 96 - The Council's support to expand the different type of educational facilities where required is noted. However, the emphasis appears to be on schools, rather than a wider range incorporating nurseries and higher education colleges. The support for education will need to translate into more robust policies if the key objective to provide better education, skills and training are to be realised as part of the wider aim to create wealth and improve opportunities and prosperity of Borough's residents.	Comments will be incorporated in the proposed submission stage.

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The Theatres Trust (Rose Freeman, Planning Policy Officer)	dmppo274	19 - Policy DM18 - Social Infrastructure	This policy does not have a heading on page 92 only sub-headings. Its title in the Contents is 'Social Infrastructure' and this should be written next to the policy number on page 92. As there is no purpose-built theatre in Waltham Forest, the Trust particularly requests that paragraph (E) provides sufficient protection to ensure continued theatre use in other venues, such as the Chingford Assembly Hall and Ye Old Rose and Crown studio theatre in Walthamstow. Buildings that provide performance spaces may not be covered by listing or conservation area designations, or may be affected by proposals which come forward for other development sites. The policy should positively protect performing arts facilities that stand-alone, are part of other facilities, or are contained within educational or community buildings. This paragraph gives prominence to leisure centres. Item i. in the first section of (E) contradicts item i. in the second part (we suggest that each part should be numbered 1. and 2. for ease of reference). We suggest for clarity that the first part of this section of the Policy deals with cultural facilities and the second part deals exclusively with leisure centres.	Comments regarding cultural facility would be incorporated at the proposed submission stage.
Workspace Group (Agent: Andrew Ransome, Director Ransome and Company Ltd)	dmppo211	20 - Policy DM19 - Strategic Industrial Locations	Workspace considers that this policy should promote economic development in the Strategic Industrial Locations as defined by PPS4, which includes Class B uses but also includes developments that: provide employment opportunities; generate wealth; and produces or generates an economic output or product. Consequently, the Council should allow for the change of use of such sites for non-Class B uses that generate economic development. This approach is important for long-term economic development within Waltham Forest. Indeed, Workspace has experienced changes in types of business activities and floorspace demand from the occupants of its property portfolio and has noticed a shift away from the requirement for traditional Class B floorspace. There has been a long and well-established trend of decline in the demand for industrial accommodation throughout East London. Workspace considers that the protection of existing employment sites for such uses will not reverse the ongoing industrial decline. Workspace considers that the Council should promote the redevelopment of inefficient employment areas within Strategic Industrial Locations for mixed-use developments that incorporate modern and flexible employment floorspace. New employment floorspace will help sustain existing employment	No change required. Policy DM19 seeks to promote economic development in SIL in line with both national policy and the London Plan. National policy is clear that housing developments are not 'economic development' uses. The London Plan policy 2.17 places a requirement on Councils to promote, manage and protect SIL for industrial and related uses. Allowing a mix of uses in SIL would therefore undermine its purposes as set out in the London Plan The Councils employment land study found all sites designated as SIL to be well functioning industrial estates.

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			use at such sites and enable sufficient flexibility and building quality to secure its continued use in the longer term. This will provide benefit in employment and economic terms through continuing to provide opportunities for a wide variety of small and medium sized businesses. The associated housing development as part of a mixed-use development will secure the delivery of this employment floorspace. Without the housing element, the redevelopment could be unviable. A mix of supporting non Class B uses within an existing estate is important for its marketability and attraction to new businesses. An important factor for any business when making its decision about where to locate is the accessibility supporting services for the day-to-day needs of businesses and its employees.	
GL Hearn Planning (Emma Beardmore)	dmppo332	21 - Policy DM20 - Borough Employment Areas	Box 1 ref 13 - is this reference correct? It is noted that the site designation mura1 from the current UDP will be carried forward in the LDF albeit that policy inb6 will now be replaced by policies dm21 and policies dm20. This site has an approved planning consent for mixed use development it is considered that MURA 1 no longer applies and it is inappropriate to apply the same policies to this site as those for industrial / employment sites in the rest of the borough.	No change required. Site 13 (Highams Road) is correctly identified as a Borough Employment Area. This is a designation carried forward from the old UDP designation (BEA2). The site previously designated as MURA1, and subject of a recent planning consent for a mixed use scheme, does not fall within this designation.
Rapleys (Anthony Pharoah, Senior Planner)	dmppo17	21 - Policy DM20 - Borough Employment Areas	We do not agree that B1 and B8 should be the main uses in Borough Employment Areas (BEA). Where appropriate, it should be recognised that Use Class B2, by virtue of its scale, and location and impact on neighbouring properties should equally be justified in BEAs. We also agree that the needs to be some flexibility to allow ancillary uses such as nurseries and catering facilities to serve the needs of employees. We strongly encourage the provision of employment spaces suitable for small and medium sized enterprises. 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	No change required. Policy DM20 makes allowance for some B2 use in Borough Employment Areas; in appropriate cases. Support for ancillary facilities noted. Based on evidence of demand, our approach is to rationalise the level of employment land provided and use existing supply more efficiently. In such a climate, it is not appropriate to justify green belt release; such as at the Kingfisher Sports Ground.

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			network. We support the Council's approach to encourage the growth of new business developments in appropriate locations across the borough, thereby reducing the need to travel and enhancing accessibility to jobs. Sites close to residential areas (and those allocated for future residential development) as well as those in accessible locations such as Kingfisher Sports Ground, should be looked upon favourably.	
Workspace Group (Agent: Andrew Ransome, Director Ransome and Company Ltd)	dmppo212	21 - Policy DM20 - Borough Employment Areas	Workspace supports Part C, which allows residential uses within the Borough Employment Areas in the key growth areas, where they act as a facilitator to an improved and intensified employment offer on site, secure other regeneration benefits, and are considered acceptable in all other respects. Workspace seeks to continue to provide good value small and medium sized business units, however in order to do this, some of their premises will require regeneration and renewal to meet the modern and future needs of London's businesses. Such regeneration requires funding and Workspace proposes that if this is to be privately funded, a high-value economic driver, such as a residential use, will be necessary to enable redevelopment and ensure the overall viability of regeneration. The benefits of this are: • The creation of modern business units, which can continue to be provided as good value rental accommodation; • The more efficient use of urban land; • The retention of the same, if not higher levels, of employment on existing sites; • The provision of sustainable mixed-use development; • The development of land to assist in meeting the targets and needs of the sub-region; • Avoidance of reliance on public funding; • The continued support of small and medium enterprises through the provision of modern, good value rental accommodation; • The provision of affordable housing if a residential component is included in the scheme, infrastructure services, new business units, supported by higher value units.	Support noted. No change required
Leyton Orient Football Club and Matchroom Ltd (Agent: Mr Clive Thompson, Director, Woodhall Properties)	dmppo100	22 - Policy DM21 - Non- Designated Employment Areas	Subject to a limit of 6 months for proof of need then open to alternative beneficial uses. Longer delays prejudice such change of use.	No change required. Imposing a limit of 6 months for proof of need before opening up to alternative uses is not considered beneficial as this could encourage landowners to neglect sites to ensure such criteria is met. It is also a relatively short period of time that fails to recognise the important role vacant units can play in

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				providing a reservoir of opportunities for new businesses to move into.
Network Rail Property (Alasdair Robinson)	dmppo298	22 - Policy DM21 - Non- Designated Employment Areas	Non Designated Employment Areas ... d) Proposals for studio space and craft workshops will be encouraged within the borough's railway arches, provided these do not undermine the vitality and viability of town and district centres. Network Rail asks that a more flexible approach be taken with regard to the uses encouraged in railway arches not located in designated employment areas. Studio space/craft workshops is highly aspirational and generally unfeasible given the costs involved in refurbishing arches and poor revenue potential. We therefore ask that all uses should be considered with no bias towards studio space and craft workshops to ensure that railway arches remain in use and contribute to the vitality of the area.	No change required. Encouragement of studio space and craft workshops in railway arches was a recommendation of the Councils Employment Land Study (URS, 2009). Furthermore sites elsewhere in London such as parts of Hackney demonstrate that use of railway arches for such purposes can be achievable. Points about the aspirational nature of such uses are acknowledged, but it should be noted that policy wording is already flexible and does not rule out alternative uses of these sites. Indeed reference is made to the vitality and viability of town and district centres, in recognition that other uses such as retail may also be appropriate
New Lammas Lands Defence Committee (Ms Katy Andrews, Planning Liaison Officer)	dmppo286	22 - Policy DM21 - Non- Designated Employment Areas	We are particularly concerned at the loss of commercial waterways - based sites, particularly boatyards and wharfages along the River Lee navigation. These are uses that cannot be carried out in any other location and should be protected.	Noted. No change to policy DM21 required. The Council will include a reference to the use of waterways for freight in the next revision of the Development Management Policies. Reference to water based recreation is already made in paragraph 36.18
The Olympic Delivery Authority (Alex Savine, Chief Planner, Policy and Relationships)	dmppo64	22 - Policy DM21 - Non- Designated Employment Areas	Policy DM21 (c) - The support for growth of existing and future businesses in specific employment areas is welcomed. However, with reference to live/work premises at point c) of the policy, it should be noted that such live/work schemes have often met with limited success in their intent and opportunities for control of this through planning mechanisms are potentially limited. Examples of delivered live/work schemes include those in Tower Hamlets and Hackney and reference to these examples could prove useful in devising appropriate mechanisms for such planning permissions that will help to ensure that such units remain as both living and working spaces. In general experience seems to suggest that live/work accommodation is most likely to succeed where this is secured through a section 106 agreement and potentially where a scheme is owned/managed by a dedicated workspace provider. It is suggested that the policy includes additional criteria requiring a section 106 agreement to secure that nature	Support noted. Insert new paragraph 22.9: "Planning obligations are likely to be necessary to ensure that where proposed, new live/work units are genuinely used as both living and working quarters, and are appropriately managed."

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			of the use and that the supporting text highlights the desirability of specific on-going scheme management.	
UK Power Networks (Operations) Ltd (Agent: Annie Pang, ADRIAN SALT AND PANG)	dmppo322	22 - Policy DM21 - Non- Designated Employment Areas	include: "Sites with temporary employment uses are excluded from Policy DM21"	No change required. Sites with temporary permissions will be dealt with on their own merits, dependent on matters such as the length of the established use, previous permissions etc.
The Olympic Delivery Authority (Alex Savine, Chief Planner, Policy and Relationships)	dmppo65	23 - Policy DM22 - Improving Job Access and Training	Encouraging to see that training opportunities will be secured, but suggest that training opportunities in the construction phase are also mentioned in part b), as well as a construction workforce travel plan in part d).	Noted. Amend opening sentence of point b to read: "Where appropriate, opportunities to secure training and recruitment of local residents as part of new developments (including in the construction phase), will be secured through:" Amend point d to read: "Major employment proposals will be expected to provide a travel plan setting out how the development will be accessed by employees (including the construction workforce), through sustainable modes of transport."
Waaltham Forest Primary Care Trust (Adrian Poynter)	dmppo383	23 - Policy DM22 - Improving Job Access and Training	We would like more information on encouraging development of jobs.	No change required. The development of jobs will be encouraged by ensuring an appropriate supply of land for employment uses (as set out in policies DM19-21), and through improving access to jobs and training for residents as set out in policy DM22. Furthermore, the evidence base for the LDF includes useful information on this matter - for instance in the Councils Strategy for Economy, Enterprise and Skills (2009), or the Local Economic Assessment (2010).
Workspace Group (Agent: Andrew Ransome, Director Ransome and Company Ltd)	dmppo213	23 - Policy DM22 - Improving Job Access and Training	Workspace supports Policy DM22, which allows new education and training facilities within employment areas. However, Workspace considers that this policy should be extended to include Strategic Industrial Land. Workspace supports new education and training facilities and considers it important for the development of the local, regional and national economy. Such training is particularly important for the development and growth of small and medium sized enterprises, which form the engine of economic growth at a local level and London-wide level. It is important that training facilities are provided close to major sources of employment to create a synergy between	Support noted. No change required. Land identified as SIL is designated for predominantly industrial and warehousing uses. Uses such as schools and colleges would not be consistent with this purpose, or the requirements of London Plan policy 2.17

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			business and education. Existing employment sites including the Strategic Industrial Land provide an important location in which to develop training facilities.	
London & Quadrant Housing Trust (Agent: Mr Adrian Kearley, AKA Planning)	dmppo30	24 - Policy DM23 - Tourism Development and Visitor Attractions	Assuming that, when it was operational, Walthamstow Stadium was defined as a tourism/visitor attraction, then it should be acknowledged that Policy DM23 should not apply to attractions that are not operational and have no prospect of providing an offer.	Comments noted. Regarding Walthamstow Stadium, the Council in June 2011 received a planning application (Ref. 2011/0898) for a mixed-use development comprising leisure use, community allotment, 301 new dwellings, children's nursery, café, crèche, public open space, associated parking, landscaping and de-culverting of the River Ching. The application was considered by the Planning Committee in May 2012. Members resolved to grant the proposal, subject to conditions, referral to the Greater London Authority and completion of the s106 Agreement.
Mr Stefan Harakis	dmppo7	24 - Policy DM23 - Tourism Development and Visitor Attractions	Reviving the EMD as a cinema-entertainment venue would be a great visitor attraction. The Council commissioned Locum Report states that this more than anything else would help to regenerate the area. The building could make use of its unique English Heritage listed interior plus its cultural history by incorporating a museum within. The Lottery Fund have already pledged up to £5 million to support this. The UCKG's application should be turned down and they should be encouraged to move on. A UCKG Helpcentre would not attract visitors, including tourists to come to Walthamstow and spend money in the area. Whereas my proposal would in fact encourage a night time economy plus further regeneration.	Part (h) of policy DM23, alongside other relevant policy requirements, would be used to judge any planning application for the EMD cinema site in future. This document does not deal with site specifics. The Council recently refused the UCKG application and will address the future of the EMD cinema in the Walthamstow town centre AAP.
Save Our Stow (Mr David Cunningham, Member)	dmppo33	24 - Policy DM23 - Tourism Development and Visitor Attractions	The importance of the Walthamstow Greyhound stadium site within the context of these policies should specifically be included. It is as important a site as the market, if not more so and, when in use, serves to bring in many visitors to the borough. It was a major visitor attraction to the borough and was only closed down in an attempt to force redevelopment. It was viable before it closed and remains so today. Bob Morton has a business plan to breathe life back into this grand old facility and details have been submitted to the council. The policies should specifically support this vision and this is where specific mention of the Greyhound Stadium should be made in support of the stated goals of the LDF DMP's and equally as	Comments noted. Regarding Walthamstow Stadium, the Council in June 2011 received a planning application (Ref. 2011/0898) for a mixed-use development comprising leisure use, community allotment, 301 new dwellings, children's nursery, café, crèche, public open space, associated parking, landscaping and de-culverting of the River Ching. The application was considered by the Planning Committee in May 2012. Members resolved to grant the proposal, subject to conditions, referral to the Greater

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			importantly the many people who made representations on land and site uses at the invitation of policy makers working on the genesis of this document.	London Authority and completion of the s106 Agreement.
The Greater London Authority (Giles Dolphin, Planning Decisions Unit)	dmppo386	24 - Policy DM23 - Tourism Development and Visitor Attractions	The emerging replacement London Plan (2010) requires at least 10% of new hotel bedrooms should be wheelchair accessible. The proposed policy option should include the 10% accessible hotel bedrooms target.	Noted. Additional text to be added to justification to clarify need for wheelchair accessible spaces.
North East London NHS Foundation Trust (Agent: Mark Underwood, Drivers Jonas Deloitte)	dmppo358	25 - Policy DM24 - Health Impact Assessments	NELFT acknowledges that health and well being are important considerations for new developments. NELFT considers that further guidance should demonstrate the ways in which new development should promote every day exercise.	Support noted. Criteria included in policy DM24 are considered to be sufficient
UK Power Networks (Operations) Ltd (Agent: Annie Pang, ADRIAN SALT AND PANG)	dmppo323	25 - Policy DM24 - Health Impact Assessments	Implementation of Policy DM24: Submission of Health Impact Assessment is nor practical and such an assessment could be subjective.	Noted - The Council considers health impact assessment as an important tool in the assessment of planning proposal.
Environment Agency (Miss Nancy Young, Planning Liaison Officer)	dmppo122	26 - Policy DM25 - Environmental Protection	We welcome the inclusion of the land contamination policy and the mention of Planning Policy Statement 23 in the supporting text. A sentence should be included in the supporting text (either in paragraph 26.3 or 26.4) which states that a Preliminary Risk Assessment (PRA) will be a required to be submitted with a planning application for sites which have the potential to be contaminated. PRAs are something we expect to see submitted with planning applications where there is a potential, or known risk of land contamination and we will often object if one has not been provided. The PRA needs to include information on past and current uses, if sensitive controlled waters receptors are present and if the site could pose a pollution risk. The PRA should also consider if any aspects of the proposed development could pose a pollution risk should contamination be present (i.e. deep drilling to facilitate the installation of foundation piles, site drainage). Further work such as an intrusive site investigation may be required depending on the findings of the PRA The requirements of a PRA are set out in our document Guiding principles for land contamination (GPLC), specifically see GPLC3, page 3. We suggest that you mention sustainable remediation within the supporting text to help guide developers. For more information, please refer to SuRF Uk and CL:AIRE Code of practice and site waste management plans. Waltham Forest has five areas	Support noted At penultimate sentence of paragraph 26.3 insert "Where a site has the potential to be contaminated, a Preliminary Risk Assessment will need to be submitted with a planning application. " Then replace last sentence with " Full site investigation procedures and sites of potential contamination in the borough, are outlined in the Council's Contaminated Land Strategy 2000." At end of paragraph 26.4 insert "In some cases, certain uses may not be suitable within areas that are particularly sensitive to land contamination." At end of paragraph 26.15 insert "Low flows in rivers can cause water quality to deteriorate. Proposals that have a potential impact on river flows must ensure that they do not aggravate existing low flows issues in rivers."

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			of Source Protection Zone (SPZ) 1. In line with GP3 (Groundwater Protection: Policy and Practice - available from our publications catalogue) some potentially polluting activities may not be suitable within these areas. For example, there are location policies in GP3 (Part 4 - Legislation and Policies, sections 1 and 3) for petrol filling stations and Waste activities which state that they are not acceptable within SPZ1 . It would be useful to mention in the justification text that certain uses may not be suitable within areas which are particularly sensitive to land contamination. 26.15 - Low flows in rivers can cause water quality to deteriorate. Proposals that have a potential impact on river flows must ensure that they do not aggravate existing low flows issues in rivers.	
New Lammas Lands Defence Committee (Ms Katy Andrews, Planning Liaison Officer)	dmppo288	26 - Policy DM25 - Environmental Protection	These are all legal requirements	No change required. Their inclusion is considered necessary in the interests of providing clarity to stakeholders.
Thames Water Property (Carmelle Bell)	dmppo216	26 - Policy DM25 - Environmental Protection	The inclusion of Policy DM25 and in particular bullet point F in relation to Water Quality is supported. The recognition that the Council will oppose development that would pose an unacceptable risk to water quality and support measures to improve water quality is strongly supported.	Support noted. No change required.
Aerodrome Standards Department Civil Aviation Authority (S Doherty, Head of Strategy and Stanards)	dmppo300	26 - Policy DM25 Environmental Protection	Whilst the CAA would not wish to comment on such plans, where officially safeguarded aerodromes lie within the Council's area of jurisdiction, we recommend that the Council considers the need of such aerodrome(s) within your development plan and consult with the aerodrome operator(s)/licensee(s) directly. Notwithstanding the comments above, the following , whilst by no means a comprehensive list of all development/aviation related issues, might provide useful background material: • 'Other' Civil Aerodromes. Operators/licence holders of civil aerodromes other than those that are officially safeguarded are advised to take steps to protect their locations from the effects of possible adverse development. To this end local authorities might agree to accept a 'non-official' safeguarding map from any local aeronautical site. If the Council has agreed to hold such maps, it should approach the site operator directly for comment on planning matters. Local planning authorities are asked to respond sympathetically to requests for non-official safeguarding. The CAA is prepared to offer advice on the preparation of a nonofficial safeguarding map at the request of	Noted. No change required.

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			any aerodrome operator or local planning authority. ODPM Circular 1/2003 (Annex 2, paragraph 13) refers. • Telecom Installations. Whilst it is noted that the General Development Order states that applications for masts within 3 km of an aerodrome should contain evidence of notification to the CAA or aerodrome operator, the appropriate contact is the aerodrome operator. Notification to the CAA will result in advice to contact the aerodrome operator. • Wind Turbines. All wind turbine proposals, whether prior to, or at, formal planning application stage, should be notified to both the CAA's Directorate of Airspace Policy and to the Ministry of Defence (Defence Estates). • High Structures. Notwithstanding the requirements of local aerodrome operators to consider the impact of structures within their (officially or unofficially) safeguarded area, away from the immediate vicinity of an aerodrome, tall structures might nevertheless constitute an aviation hazard. In view of this, there is a mandatory lighting requirement for structures of a height of 150m or more. Moreover, away from aerodromes, even structures less than 150m high may need to be lit if by virtue of their nature or location they constitute a significant hazard to air navigation. It is recommended that all proposed developments over 90m in height should be notified to the Directorate of Airspace Policy (OAP) and comment sought relating to the need or otherwise for aviation obstruction lights. Additionally, to cater for the need to record in aviation documents and charts structures extending 91.4m (300ft) above ground level, local planning authorities are asked to inform the CAAJOAP about developments that might breach this level. DfT/ODPM Circular 1/2003 (Annex 2, paragraph 30-32) refers. • Venting and Flaring. Venting and flaring of gas should be anticipated with mineral extraction. This might have a potential impact upon the safe operation of aircraft in the immediate vicinity. With this in mind, should planning permission be granted, it would be essential to establish whether such releases of gas would constitute a potential danger to overflying aircraft. If there were such a danger, the site would need to be promulgated to the aviation community along with advisory avoidance criteria.	
Barclays Bank plc (Agent: Michael Fearn, Shire Consulting)	dmppo137	27 - Policy DM26 - Managing Changes of Use in Town Centres	The Preferred Options Development Management Policies DPD (the DMDPD) recognises that the wide variety of activities in shopping centres include businesses such as banks and that "the diversity of uses and accessibility to people living and	a) The policy approach recognises and supports the role of Banks and Building Societies hence the specific reference made to banks and buildings within the A2

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			working in the area is important to sustaining their viability" (para. 27.1), but the Council's approach to Primary and Secondary frontages in Policy DM26 and its Justification is confused and inconsistent. Like the Core Strategy, the DMDPD also makes no attempt to review whether existing policies need to be re-examined. Indeed Policy DM26 merely repeats the wording of UDP Policy TRLS, but in a slightly different order, without providing any robust evidence for doing so. Item (iii) of DM26 appears to recognise that banks and building societies "provide a service directly related to a shopping trip" but this is undermined by the rest of the policy wording which persists in an out-of-date attitude towards such financial service retailers that is unjustified and unsupported by any evidence. Paragraph 27.6 alleges that "Most non-retail uses or service businesses rather tend to gain from the availability of footfall generated by other uses, particularly retail" but the Council provides no evidence for this assertion. In fact, as set out in this representation, the Bank's evidence clearly shows that it is other retail uses that tend to gain from the higher footfall associated with its branches. The paragraph then continues by perpetuating the outdated view that vitality and viability are dependant upon "the essential retailing function", a view that conflicts with more recent Government policy and is contradicted by the Council's own acknowledgement in paragraph 27.8 that "Some non-retail uses, such as banks, building societies and cafe provide services which are directly related to a shopping trip ..... . Therefore they generate high levels of pedestrian activity and need not cause blank spaces in the shopping frontage if shop style windows and displays are maintained". The wording then goes on: "Therefore this policy makes some provision for such uses", however that "provision is severely constrained by Policy DM26 despite the acknowledged high levels of pedestrian activity such uses generate. Paragraph 27.4 refers to "the key policy considerations" set out in paragraph 27.9 (they are actually in 27.10) that will relate to the acceptability of non-A1 uses in designated frontages including "the extent to which the proposed use may be associated or combined with a shopping trip [and is] capable of attracting a significant number of visitors", and "the contribution the proposed use will make to the vitality and viability of the proposed frontage and the centre generally". This is then totally contradicted by the comment that	Class and the exclusion of all other A2 uses in primary frontages. Elsewhere in town centre locations generally, banks and building societies are generally supported. b) The designation of primary and secondary frontages is supported by national policy. c) The Council's current policy has been successfully applied over the years in managing changes of use within town centres. As evidence, the performance of the current UDP policy has been monitored through the AMR. There is no reason to adopt an alternative policy approach. c) c) The reference made to "key policy considerations" should relate to paragraph 27.10 and not 27.9. The error will be corrected. e) The reference made to 'local need' specifically relates to evidence from local need surveys.

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			"The Council will not grant planning permission for non-retail uses within a primary frontage if there are suitable premises in nearby secondary frontages" (para. 27.10), despite the Council being in no position to assess whether premises are "suitable". Three paragraphs later, "The Council accepts that non-retail uses, which provide services to visiting members of the public, make a contribution to the vitality of shopping centres" (para. 27.13). Furthermore, the references in paragraph 27.10 to identifying "need" should be removed as this is no longer in Government policy. On the matter of policy formulation PPS12 is clear that all DPDs must be: • "founded on a robust and credible evidence base"; • "the most appropriate strategy when considered against the reasonable alternatives"; and must be • "consistent with national policy". Keeping significant generators of footfall out of primary frontages will actively work against the achievement of the Council's strategic objectives and is inconsistent with national policy. The Council should recognise the positive impact that financial service retailers such as the Bank have upon vitality and viability. The production of the LOF provides an opportunity to examine new evidence and to revise out-of-date policy, particularly if it is not consistent with national policy. Limiting certain Part A uses in the primary frontage underlines the Council's intention to attract private sector investment in the town centre. The implication that only A 1 uses are appropriate derives from very outmoded and discredited thinking that other uses such as banks detract from the vitality and viability of town centres. By definition, uses that fall within Part A of the Use Classes Order are appropriate in town centres as they are "shopping area uses" and are acceptable without any need for restriction or qualification. This is particularly the case for the financial services sector. ODPM Circular 03/2005 "Changes of Use of Buildings And Land" which accompanied the last major revisions to the Use Classes Order specifically states in relation to the A2 Financial and Professional Services use class (which was created to separate those uses "serving the public, from other office uses not directly serving the public ~ - paragraph 32), that the Class is also "designed to allow flexibility within a sector which is very much a part of the established shopping street scene, and which is expanding and diversifying". The uses within Class A2 are noted as being those "which the public now expects to find in shopping areas" (paragraph 38). The wider role played by	

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			town centres than a pure shopping function is recognised throughout Government policy on town centres. Government Policy in PPS4 "Planning for Sustainable Economic Growth" continues the thrust of policy in PPS6 relating to town centres but particularly emphasises the importance of economic growth. Policy EC3.1 c states that Planning Authorities should: "at the local level, define the extent of the centre and the primary shopping area in their Adopted Proposals Map", following consideration of whether there is evidence of a need to designate '"realistically defined primary and-secondary frontages in designated centres". The strong emphasis upon the promotion of town centre vitality and viability remains in the current PPS and the Government is clear that there should be a positive attitude towards all development which generates wealth and creates employment. The "over-arching objective is sustainable economic growth" (paragraph 9). The Government wants economic growth to be focused in town centres offering "a wide range of services to communities in an attractive and safe environment and remedying deficiencies in provision in areas with poor access to facilities ". There should be "enhanced consumer choice through the provision of innovative and efficient shopping, leisure, tourism and local services in town centres" (paragraph 10). Policy EC10.1 states that "Local planning authorities should adopt a positive and constructive approach towards planning applications for economic development. Planning applications that secure sustainable economic growth should be treated favourably"_ There is nothing in Government policy that recommends or supports imposing restrictions upon acceptable town centre uses at aU and indeed Policy EC3.1 states that local planning authorities should •set flexible policies for their centres which are able to respond to changing economic circumstances ... n. It is therefore essential that DPD policies should facilitate the positive approach required by PPS4. Promoting vitality and viability in town centres are objectives of the Government and the Council. To succeed, town centres need to provide a full range of services and these often need to be located in ground floor premises in accessible locations. Indeed, Class A2 retailers such as the Bank routinely experience very high levels of customer visitation, contributing significantly towards pedestrian movement and therefore the vitality and viability of town centres. The Bank has undertaken a number of	

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			comparative footfall surveys in connection with its current acquisitions programme at its branches in various towns and cities in the UK (copies are attached). These conclusively show that the level of footfall associated with Bank branches is commensurate with, and often higher than, the best known national multiple Class A 1 traders. Banks also have moved away from the traditional style of frontage, preferring to have an open, visually interesting and attractive face to the 'high street'. The Bank has become increasingly retail in its presentation and has introduced an innovative 'flagship' branch design, which has been developed in association with its customers, to transform banking into what it terms as -8 retail focused experience". The Bank estimates that some 10 million customers use its branches each week and through listening to their feedback, a design has been developed that meets their requirements for modern banking and provides branches similar in appearance and in operation to retail shops. This is an example of the -enhanced consumer choice through the provision of innovative and efficient shopping, leisure, tourism and local services in town centres" that PPS4 expects and to which the Core Strategy (and other DPDs) must also positively respond. Whilst the design of every new branch has to be flexible in order to be sensitive to the requirements of each building occupied, the aim is generally to ensure that over 70% of the internal space at ground floor is accessible to customers. The Bank's managers regularly report that upon the opening of a 'flagship' branch the customer visitation levels significantly increase and thus the level of activity helps to underpin pedestrian flows to the benefit of surrounding traders. It is therefore important that planning policy recognises the benefit of bank uses in fostering footfall and pedestrian activity and that it should not resist much-needed investment by financial service retailers. The Bank's footfall surveys have been a key element in helping to change attitudes towards the presence of banks in core shopping areas and primary frontages. Even planning authorities that once strongly resisted Class A2 uses in their primary areas have granted permission for 8arclays 'flagship' outlets. Examples of authorities that have recognised the wider benefits of the 'flagship' design (following receipt of applications which have been supported by evidence of high footfall), include Southampton, Reading, Manchester, Milton Keynes, Romford, Southend, Leicester, Plymouth, Sheffield,	

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			Kensington & Chelsea and Cambridge. Follow up surveys were carried out in 2010 at Milton Keynes, Southend, Reading and Southampton (copies are attached). In every case the new 'flagship' branch significantly increased footfall, confirming the Bank's beneficial effect on vitality and viability. The Core Strategy's objectives will require major commitment and substantial investment by the private sector. Pursuing restrictive policies to keep significant generators of footfall such as the Bank out of primary shopping frontages will actively work against the achievement of those objectives and is an outdated and discredited approach. The Bank therefore considers that the wording of Policy DM26 makes it 'unsound' as it is neither consistent with National Policy nor Justified. The Council has provided no robust and credible evidence to justify the arbitrary restriction of financial service retailer& in shopping frontages and furthermore has not given consideration to reasonable alternative strategies. Finally, paragraph 27.25 suggests that changes to designated frontages will be made through the preparation of a Supplementary Planning Document. That is contrary to Government Policy as such matters should be set out in formal DPDs and be subject to independent scrutiny to determine whether they are based on robust evidence. CLOSING COMMENTS The Council recognises the need for significant private sector investment in the town centre so the opportunity provided by the preparation of the main elements of the LDF should be used to give greater encouragement to appropriate Part A uses to invest and to improve the quality of their representation. The Bank's evidence of how it increases vitality and viability in primary frontages shows that there is considerable benefit in seeking to attract those A2 users such as banks who provide a high level of investment in and maintenance of their premises, resulting in active and attractive street frontages. This will foster very significant footfall and pedestrian activity and attract investment by others, helping to provide the confidence and commercial viability necessary for any programme of regeneration and investment. Restrictive planning policy designed to keep significant generators of footfall such as the Bank out of primary shopping areas will actively work against the achievement of the Council's strategic objectives and is inconsistent with national policy. In fact there is nothing in Government policy that recommends or supports imposing constraints upon acceptable town centre uses at all.	

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			Any continuation of historic primary frontage policy is unjustified by robust and credible evidence and the Council has provided no explanation for the decisions it has taken about the most appropriate strategy to follow when considered against the reasonable alternatives. The Council's documents show no indication that it has gone through an objective process and audit trail of assessing alternatives, or indeed that alternatives have even been considered at all. The Council's present attitude to banks and building Society uses in designated shopping frontages is neither Justified nor Consistent with National Policy so the Bank therefore objects to Policy DM26 and its Justification as it is unsound. This Policy should be rewritten to make clear that financial services retailers such as the Bank are appropriate in all designated shopping frontages, without restriction and that this will be reflected in any subsequent DPDs such as Area Action Plans.	
GL Hearn Planning (Emma Beardmore)	dmppo335	27 - Policy DM26 - Managing Changes of Use in Town Centres	Clarification is required as to how percentages have been derived.	The definition of primary and secondary frontages and the drawing up of policies that make it clear which uses will be permitted in such locations is broadly in line with **national policy**. The percentage thresholds have been transferred from the current UDP and have monitored over the years through the AMR.
Mr Stefan Harakis	dmppo11	27 - Policy DM26 - Managing Changes of Use in Town Centres	27.10 : In assessing new uses the factors which determine a decision are (1) the extent to which the proposed use may be associated with a combined shopping trip and (2) the extent to which the change of use meets an important local need. Surely the answers to both (1) and (2) in relation to the UCKG's application are emphatically 'no', as was the decision in their 2003 application. In relation to (1) it would not contribute to a shopping trip and thus help regeneration but in fact it would aid degeneration. In relation to (2), how can a change of use which proposes coercing the public into giving their money to the UCKG-largely based on bogus testimonies-to the point where it could bankrupt them, be meeting an important local need?! Furthermore, it will not help regeneration but in fact degeneration. I cannot see how (2) can be disassociated with the usage of the building as their particular cultish style of 'worship'. Clearly we already have hundreds of places of worship in the borough, without even mentioning the cultish style of the UCKG.	This consultation does not relate to the planning application on the EMD cinema site.

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The Mall Limited Partnership (Agent: Miss Marie Jasper, Associate Barton Willmore)	dmppo127	27 - Policy DM26 - Managing Changes of Use in Town Centres	Policy DM26 relates to Managing Changes of Use in Town Centres and sets out the policies for non retail uses in town centre and retail parades. While it is appropriate for prioritise the provision of retail floorspace in town centres, PPS4 states the local authorities should:" ... set flexible policies for their centres which are able to respond to changing a. economic circumstances and encourage, where appropriate, high-density development accessible by public transport, walking and cycling. "'(Policy EC3. 1a) To this end we would stress the need to ensure the Development Management Policies DPD is sufficiently flexible to deal with changing economic circumstances, such that It does not unnecessarily prevent alternative uses coming forward in the event that it can be demonstrated that there is no demand for retail floors pace at some later date during the plan period, and an alternative use would contribute to the vitality and viability of the town centre.	The policy approach set out provides full flexibility in dealing with changing economic circumstances. The designation of primary and secondary frontages is supported by national policy. Paragraph 27.10 provides the necessary flexibility to consider other uses.
Aviva Life and Pensions UK Ltd (Agent: Sarah Dawson, Associate Barton Willmore)	dmppo240	28 - Policy DM27 - New Retail, Office and Leisure Developments	We support the policy, which seeks in the first instance to concentrate development proposals within the designated centres within the Borough.	Support Noted
The Mall Limited Partnership (Agent: Miss Marie Jasper, Associate Barton Willmore)	dmppo128	28 - Policy DM27 - New Retail, Office and Leisure Developments	Policy DM 27 relates to New Retail, Office and leisure Development and encourages new town uses to be concentrated In designated centres and parades, in accordance with the hierarchy of town centres. It is unclear what is meant by new town uses" within this policy, this matter should be clarified in the supporting text. In general our Client is supportive of the implementation of the town centre hierarchy in Policy DM27 and the protection afforded to the existing market in Walthamstow Town Centre. Additionally our Client is supportive of Paragraph 28.5 which identifies Walthamstow as the focus for large-scale retail and leisure developments which Is In accordance with PPS4 and the town centre hierarchy.	Paragraph 28.3 of the policy explains the meaning of new town centre uses. It relates to new development proposals falling within the definition of town centre uses as provided by national policy.
The Olympic Delivery Authority (Alex Savine, Chief Planner, Policy and Relationships)	dmppo66	28 - Policy DM27 - New Retail, Office and Leisure Developments	The broad thrust of policy DM27 is supported. However part c) of the policy may benefit from revised wording to increase flexibility to allow for small scale markets or temporary uses in certain circumstances. Temporary activities and events are likely to be important in increasing activity within the Olympic Park in the transformation and legacy phases.	The Council considers that there is sufficient flexibility to allow the operation of a market on temporary basis. The Town and Country Planning (General Permitted Development) Act 1995, permits the use of land the purpose of holding markets for not more than 14 days in any calendar year.
Mr Stefan Harakis	dmppo9	29 - Policy DM28 - Night Time	The Council commissioned Locum Report states that the EMD being revived as a cinema-entertainment venue would do more	The Council notes the point made about the EMD cinema and the UCKG planning

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		Economy Uses	than anything else to regenerate the area, especially fostering a much needed night time economy. Whereas a UCKG Helpcentre would do the opposite and degenerate the area and corrupt vulnerable persons.	application. However this is a site specific issue. The policies included in this document have a wider application. Site specific policies relating to this site will be considered as part of the Walthamstow Town Centre Area Action Plan.
The Theatres Trust (Rose Freeman, Planning Policy Officer)	dmppo276	29 - Policy DM28 - Night Time Economy Uses	We are pleased to see that theatres are included in the introduction to this policy which relates to the vibrancy of town centres' entertainment offer.	Support Noted
English Heritage (Nicholas Bishop, Regional Planning Advisor - London Region)	dmppo307	30 - Policy DM29 - Heritage Assets	29 Policy DM29 - Heritage Assets We welcome the text provided regarding the management of heritage assets and we look forward to reviewing the Locally Listed Buildings SPD.	Work on the Locally Listed Buildings SPD is in progress.
London & Quadrant Housing Trust (Agent: Mr Adrian Kearley, AKA Planning)	dmppo31	30 - Policy DM29 - Heritage Assets	L&Q support Policy DM29 but would refer the Council to paragraph HE11 of PPS5 regarding 'enabling development' and objectives to realise the optimum viable use of an asset.	Comment noted
Mr Dennis Tilley	dmppo131	30 - Policy DM29 - Heritage Assets	The proposed plans are in the main too woolly, while some of the ideas could be very useful for improving our borough, it is quite clear that most will not get of the ground; due the council's inability to get things moving and overcoming all the problems that relate to large scale improvements including even the smaller developments. Monitoring is a key-word in some of this documentation, but it needs to be accurately monitored and action taken such as enforcement if required. The council have an abysmal record on enforcement and dealing with large scale projects for example. While the protection of our conservation areas is required, it will not succeed unless the necessary enforcement action is taken to protect them. The areas of special character that should be mentioned in these plans is not considered such as my own the Belle Vue Park Estate, which is steeped in history and interesting family homes, and I have written to you over the last few years has been dismissed out of hand. These areas could have been included in the UDP or in the LDF.	The Council has a wide range of enforcement powers and can use these to implement this policy. The possible designation of Belle Vue Park Estate as area of special character was considered by the Council in 2006. Whilst noting that the area contained a variety of interesting and attractive buildings, they were neither particularly unusual nor exceptional, with similar examples being found throughout the borough to justify designation as Area of Special Character. Further supporting evidence from the Waltham Forest Characterisation study does not justify the need to treat the Belle Vue Estate differently from many other similar areas.
Mr Stefan Harakis	dmppo10	30 - Policy DM29 - Heritage Assets	30.4 "It is recognised that the historic environment contributes to the enjoyment of life in the borough and provides a unique sense of identity." In which case, the EMD building should be retained as a cinema-entertainment venue rather than converted into a UCKG Helpcentre. A museum could be	The Council notes the point made regarding the EMD cinema and the UCKG planning application. This is site specific issue to be covered in the Walthamstow Town Centre Area Action Plan.

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			incorporated into the building celebrating its rich cultural history, whilst it operates once again as an entertainment venue for the whole community.	
Mr Stefan Harakis	dmppo8	30 - Policy DM29 - Heritage Assets	At Policy 30.1, Heritage Assets: It states how once harmed, historic buildings can lose their character and their significance. How, "changes to the built environment can harm what is special about the borough's historic environment and must be strongly resisted". In which case, the culturally historic EMD building should not be changed into a UCKG Helpcentre.	The Council notes the point made regarding the EMD cinema and the UCKG planning application. This is site specific issue to be covered in the Walthamstow Town Centre Area Action Plan.
New Lammas Lands Defence Committee (Ms Katy Andrews, Planning Liaison Officer)	dmppo289	30 - Policy DM29 - Heritage Assets	The industrial archaeological heritage of the Lea Valley, particularly with respect to the historical uses of the River Lea and Lee Navigation and the importance of this area for water supply, should be retained and if possible enhanced. Consideration should be given to working in partnership with LB Hackney to extending the existing Lea Bridge Conservation Area, to cover the Essex and Middlesex filtering beds (including the Thames Water (Essex No.1) filter beds, currently occupied by Clancy Docwra)	The Council recognises the historical value of the Lea Valley area, including the filtering beds. The Council has started partnership working with other organisations on the Walthamstow Wetlands Project. Site specific proposals for this area will be developed as part of the preparation of the Blackhorse Lane Area Action Plan and also the emerging Upper Lea Valley Opportunity Area Planning Framework.
Sandra MacPhee	dmppo262	30 - Policy DM29 - Heritage Assets	30.14 - Should there not be mention of conservation area appraisal and management plans? 30.9 - 2nd bullet point - should there not be mention of conservation area leaflets?	Accepted. It is proposed to amend the opening sentence of paragraph 30.14 to read as follows: In considering planning applications, the Council will also refer to Conservation Area Appraisals and Management Plans prepared (see paragraph 15.14-15.15, Policy CS12 of the Core Strategy). In applying this policy it will be a requirement for planning applications to contain sufficient detail to allow aesthetic and environmental aspects to be fully evaluated.
Save Our Stow (Mr David Cunningham, Member)	dmppo34	30 - Policy DM29 - Heritage Assets	English Heritage have said in a letter to the council (21 Dec 2010) that under the cartilage listed building rules they consider that the whole of the buildings on site are 'Heritage Assets'...and that 'heritage assets have a place in shaping and in establishing sustainable communities and economic vitality'...and there should be a presumption in favour of the conservation of designated heritage assets'.. and they advised that the best use for an historic building is the one for which it was originally designed. This assessment makes the Walthamstow Stadium site one of the most important listed buildings in the borough and it should specifically be featured in	Comments noted. It would be inappropriate to make specific reference to the Walthamstow Stadium site in this document. Regarding Walthamstow Stadium, the Council in June 2011 received a planning application (Ref. 2011/0898) for a mixed-use development comprising leisure use, community allotment, 301 new dwellings, children's nursery, café, crèche, public open space, associated parking, landscaping and de-culverting of the River Ching. The

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			policy DM29 in a way that protects the historic fabric and which encourages the return of the use for which it was originally designed.	application was considered by the Planning Committee in May 2012. Members resolved to grant the proposal, subject to conditions, referral to the Greater London Authority and completion of the s106 Agreement.
Whipps Cross University Hospital NHS Trust (Agent:Mr Andy Bateson, Managing Director AB Planning & Development Limited)	dmppo19	30 - Policy DM29 - Heritage Assets	The Whipps Cross University Hospital site has an extensive array of Edwardian period buildings that appear on the Council's list of Locally Listed Buildings. All the buildings that appear on the Local List, (the chapel, gatehouses and water towers - Blocks 28, 29 and 30, which were constructed in 1903-1904) and the attached 4-storey wards (Blocks 17, 18, 21, 22, 25, 34, 39 and 40 that were constructed between 1908-1910) are currently occupied as operational acute care hospital buildings. The Secretary of State/English Heritage have twice considered and rejected both times the potential statutory listing of these locally listed buildings at the hospital. Subsequent to those decisions, it was agreed between the Whipps Cross University Hospital NHS Trust and the London Borough of Waltham Forest that should any or all of those buildings become surplus to hospital requirements then only the original chapel, gatehouses and water towers would be retained and converted to residential use. This agreement was termed "the minimum retention scheme" and it would accord with the aims identified in criteria F) of Policy DM29. If any of the other locally listed buildings did ever become surplus to hospital requirements then the Trust would be willing to consider their possible retention and conversion to residential use but only if such conversion represented a viable option for the Trust and they would not be bound to retain them. Accordingly, therefore, the Hospital Trust does not support the suggested policy restriction imposed by Policy DM29 and accompanying Paragraphs 30.19-30.22 that could effectively prevent the demolition and redevelopment of Blocks 17, 18, 21, 22, 25, 34, 35, 39 and 40 as that would be contrary to the agreement previously reached between the Council and the Hospital Trust and the earlier decisions of the Secretary of State/English Heritage.	Planning applications are considered on their merits - also in accordance with national planning policies.
English Heritage (Nicholas Bishop, Regional Planning Advisor - London	dmppo308	31 - Policy DM30 - Design Principles, Standards and Local	Policy DM30 The design policy could be further strengthened with an explicit reference to historic context, which is specifically acknowledged already within the supporting text. This would be achieved most simply by augmenting point x to	Accepted. Bullet point (ii) to be amended to read as follows: "reinforce and/or enhance local character and distinctiveness, taking account of patterns of development, urban

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Region)		Distinctiveness	read: "ii. reinforce and/or enhance local character and distinctiveness, taking account of patterns of development, urban form, building typology, detailing and materials, trees and landscaping etc and other features of local and historic significance;"	form, building typology, detailing and materials, trees and landscaping etc and other features of local and historic significance".
New Lammas Lands Defence Committee (Ms Katy Andrews, Planning Liaison Officer)	dmppo290	31 - Policy DM30 - Design Principles, Standards and Local Distinctiveness	Waltham Forest has several distinctive architectural styles, particularly the late 19th century Warner Estates housing, in an early 'garden city' style. This should serve as the design template for all new residential development.	The Council recognises the value of the Warner Estates. However it would not be appropriate to impose rigid architectural styles such as this.
The Olympic Delivery Authority (Alex Savine, Chief Planner, Policy and Relationships)	dmppo67	32 - Policy DM31 - Inclusive Environment and Built Environment	Figure 32.1 Geology and figure 33.1 Topography seem out of place here and do not appear to be cross referenced - are they meant to aid the tall buildings consideration?	The Council notes that the Figs 32.1 (on geology) may be out of place in this section. It is proposed to correct this.
CPRE North East London (Mr John Gilbert, Secretary)	dmppo14	33 - Policy DM32 - Tall Buildings	Key regeneration sites' needs to be defined.	As a general approach, Core Strategy Policy CS15 (C) establishes the locational criteria for considering proposals for tall buildings.
English Heritage (Nicholas Bishop, Regional Planning Advisor - London Region)	dmppo309	33 - Policy DM32 - Tall Buildings	33 Policy DM32 - Tall buildings We are pleased to see a specific policy to address tall buildings and the makings of a plan-led approach (subject to further clarity as expressed in our response letter to the Submission Core Strategy and Preferred Option Northern Olympic Fringe AAP), we are concerned that the wording of the policy is currently ambiguous, firstly in stating that tall buildings will not 'normally' be appropriate across the Borough, and secondly, in citing the potential tall buildings locations as examples. The text could be tightened to indicate explicitly where tall buildings may and may not be appropriate based upon the sound evidence and as expressed explicitly in the Core Strategy and AAPs (which will provide further detailed analysis of these areas). Otherwise, we are pleased to see that English Heritage/CABE's guidance is referred to within the policy.	The inclusion of the word 'normally' is considered appropriate. Provided there are sufficient safeguards, tall buildings may be appropriate at some locations subject to meeting the criteria listed. The emerging Site Allocations Development Plan Document will identify the key sites being considered.
English Heritage (Nicholas Bishop, Regional Planning Advisor - London Region)	dmppo310	33 - Policy DM32 - Tall Buildings	Tall buildings - justification (para 33.2) For further clarity we suggest that the second sentence of paragraph 33.2 is augmented to read "CABE and English Heritage guidance encourages local authorities to have a well considered, plan-led approach... " We welcome the commitment to further detailed assessment work. For greater accuracy, this could be rephrased to state a commitment to "further detailed assessment to [delete "support the management of"] identify	Accepted. As a general approach, Core Strategy Policy CS15 (C) establishes the locational criteria for considering proposals for tall buildings.

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			areas where tall buildings may and may not be appropriate within [delete -"in"] the borough".	
Environment Agency (Miss Nancy Young, Planning Liaison Officer)	dmppo123	33 - Policy DM32 - Tall Buildings	Tall buildings generally require deep foundations, which could have undesirable impact on the subsurface and other structures, depending on their depth and the local geology. Proposals should make provisions to minimise such risks.	Structural issues regarding tall buildings are considered at the detailed planning application/building control approval stage.
Leyton Orient Football Club and Matchroom Ltd (Agent: Mr Clive Thompson, Director, Woodhall Properties)	dmppo111	33 - Policy DM32 - Tall Buildings	A) Good design overrides arbitrary height requirements. Each scheme must be judged on its own merits. CABE should have the right only to advise.	As a general approach, Core Strategy Policy CS15 (C) establishes the locational criteria for considering proposals for tall buildings**.** The Council notes the need to consult key organisations on proposals for tall buildings.
New Lammas Lands Defence Committee (Ms Katy Andrews, Planning Liaison Officer)	dmppo291	33 - Policy DM32 - Tall Buildings	New tall buildings over five storeys in height should be limited to urban centres, where such buildings would not significantly exceed the height of surrounding buildings	Policy 32 sets out the locations and factors to be considered with regard to tall buildings.
UK Power Networks (Operations) Ltd (Agent: Annie Pang, ADRIAN SALT AND PANG)	dmppo324	33 - Policy DM32 - Tall Buildings	Certain sites (such as the site of No. 442 Cathall Road) lend themselves to the development of tall buildings. They can act as focal points in an otherwise monotonous townscape.	As a general approach, Core Strategy Policy CS15 (C) establishes the locational criteria for considering proposals for tall buildings.
Whipps Cross University Hospital NHS Trust (Agent:Mr Andy Bateson, Managing Director AB Planning & Development Limited)	dmppo20	33 - Policy DM32 - Tall Buildings	Whipps Cross University Hospital NHS Trust support the acceptance given in Policy DM32 and accompanying Paragraph 33.9 that tall buildings will be permitted in any redevelopment of underused land at the hospital and other 'Key Regeneration Sites', subject to a site planning and design brief. The underused land at Whipps Cross University Hospital has a range of 1, 2, 3 and 4-storey buildings across it and some of the buildings on the site and elsewhere within the hospital grounds are up to the heights that would normally be expected of 5 and 6-storey buildings. Accordingly, therefore, subject to detailed design considerations, the construction of 3, 4, 5 and 6-storey residential development across the underused land at the hospital site should be perfectly acceptable in the Trust's opinion.	As a general approach, Core Strategy Policy CS15 (C) establishes the locational criteria for considering proposals for tall buildings.
Workspace Group (Agent: Andrew Ransome, Director Ransome and Company Ltd)	dmppo214	33 - Policy DM32 - Tall Buildings	Workspace supports tall buildings within in town centres such as Walthamstow or key regeneration sites and growth areas. However, Workspace considers that tall buildings should be considered in other areas particularly where they are essential for the delivery of regeneration schemes and where they will	Support Noted - the emerging Site Allocations Development Plan Document will identify the key sites being considered and the site specific considerations relating to proposals for tall buildings.

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			assist in enabling the delivery of modern economic floorspace within mixed-use developments. Workspace considers that tall buildings allow for the efficient use of land and provide excellent regeneration opportunities through the provision of mixed-use developments that include housing and employment floorspace.	
Leyton Orient Football Club and Matchroom Ltd (Agent: Mr Clive Thompson, Director, Woodhall Properties)	dmppo112	34 - Policy DM33 - Managing Impact of Development on Occupiers and Neighbours	Each site and development shall be subject to specific case consideration on its own merits.	Subject to site specific proposals as set out in the development plan, planning applications will considered on their own merits.
New Lammas Lands Defence Committee (Ms Katy Andrews, Planning Liaison Officer)	dmppo292	34 - Policy DM33 - Managing Impact of Development on Occupiers and Neighbours	(e) Buildings should not be permitted which are significantly higher or bulkier than the existing surroundings in general, and should be of a similar appearance and architectural style of the general area. Tall building 'creep' must be discouraged	Policy DM 32 specifically deals with tall buildings and lists the factors to be considered in considering such proposals. The design policies included in this document generally support developments that are sympathetic to its context. However it also encourages new/modern architectural styles that are also sympathetic to the character of an area.
Her Majesty's Court Service (Agent: Miss Charlotte Handscomb, DPP LLP)	dmppo134	35 - Policy DM34 - Improving Community Safety	As noted above, HMCS plays a key role in the delivery of safe and secure neighbourhoods. As such, we support Policy DM34, which seeks to improve community safety and cohesion.	Support noted. No change required
The Olympic Delivery Authority (Alex Savine, Chief Planner, Policy and Relationships)	dmppo68	35 - Policy DM34 - Improving Community Safety	Welcome the Council's policy aspirations for community safety in DM34 and strategic objectives are noted, but consider that the emphasis could possibly be widened to include the importance of good lighting design to reinforce secure by design principles and the impact that this would have on improving community safety and creating attractive and welcoming environments. Paragraph 35.5 emphasises the support for good design and the importance that this would make through integrating measures to combat against anti-terrorist activities, particularly in town centre. Whilst no objection with the principles, it is welcomed that the more proactive policies are adopted to realise this objective, specifically the use of glazing in shop fronts or suitable street design and furniture for use along the public realm	Noted. Amend paragraph 35.3 to read: " Appropriate levels of active frontages and natural surveillance will increase 'eyes on the street' and allow public places to be sufficiently overlooked. Such opportunities can also be enhanced through the use of appropriate lighting. Natural surveillance this can significantly discourage criminal activity and can have a positive knock-on effect by encouraging greater use of the public realm which, in turn, can improve feelings of safety."
Environment Agency (Miss Nancy Young, Planning Liaison Officer)	dmppo124	36 - Policy DM35 - Water	We are pleased to see that paragraph 36.12 states that developments should restrict run-off rates to the undeveloped Greenfield run off rate and should use SuDS. However, we feel that the requirement for Greenfield run-off rates through the	Noted- these comments will be taken forward in the text and justification of Policy DM35 in the DM policies Proposed Submission

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			maximisation of SuDS should be included in the policy, not just in the supporting text. This is an important flood risk management consideration and jf it were in the policy it would make it much stronger. We also feel that paragraph 36.12 could benefit from clarification that the Greenfield run-off rate should be achieved through the maximisation of SuDS and that the SuDS hierarchy should be adhered to. Infiltration SuDs should only be used where there are suitable ground conditions and not in land with contamination issues. In addition there is no mention in Section E of Policy DM35 of managing flood risk by ensuring that development does not cause a reduction in the volume of floodplain storage volume. It is important that this is included as any reduction in storage volume would result in an increased risk of flooding elsewhere. There also to be a comment made in this section to say that any new developments in areas at risk of flooding will be subject to the Sequential Test and Exception Test (where applicable) in line with PPS25. Section F of Policy DM35 mentions Land Drainage Consent. This is now called Flood Defence Consent. 36.5 - Crossness is not a reservoir storage area, it is a Sewage Treatment Works with storm tanks which can be used as part of the Desalination plant. Major storage reservoirs are located within the Lee Valley and in West London at Richmond. Borehole abstraction from the confined Chalk is an important contribution to London's water supply. We recommend that the term 'minor borehole' is replaced with: "Additionally, water supplies are supplemented by groundwater abstractions and a new desalination plant at Beckton: Underground development can cause flooding as a result of the impediment of groundwater flow. It is necessary for FRAs to consider the additional risk of flooding due to changes in groundwater flow and/or level; It should also make proposals for reduction and for mitigation of any residual impacts. This should be mentioned within the supporting text.	
Leyton Orient Football Club and Matchroom Ltd (Agent: Mr Clive Thompson, Director, Woodhall Properties)	dmppo114	36 - Policy DM35 - Water	B) Merits can only be site specific on proof and analysis.	Noted. The Council considers details outlined in criteria B) to be assessed for each case on its individual merits.
New Lammas Lands Defence Committee (Ms Katy Andrews,	dmppo293	36 - Policy DM35 - Water	Buildings adjacent to waterways should not exceed four storeys in height, should respect and respond to the waterside context. Where possible, wharfages and riverside uses should be	Core Strategy policy CS15 Well Designed Buildings, Places and Spaces and policy DM32 Tall Buildings assess planning

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Planning Liaison Officer)			retained and enhanced.	applications in terms of height. DM35 and paragraphs 36.17 and 36.18.refer to the value of waterways for sport and recreation. Reference to the use of waterways for freight will be included in DM policies Proposed Submission.
North East London NHS Foundation Trust (Agent: Mark Underwood, Drivers Jonas Deloitte)	dmppo374	36 - Policy DM35 - Water	NELFT considers that provision for part E) should be made in line with planning policy statement 25.	Part E) is in accordance with national policy. DM35 Water will be used in conjunction with CS4 when assessing planning applications.
Thames Water Property (Carmelle Bell)	dmppo219	36 - Policy DM35 - Water	The importance of considering water and sewerage infrastructure provision in the emerging LDF Documents is highlighted by paragraph 4.9 of the PPS12, which states that in preparing Local Development Documents: “LPAs should ensure that delivery of housing & other strategic and regional requirements is not compromised by unrealistic expectations about the future availability of infrastructure, transportation and resources. Annex B sets out further guidance on resources, utilities and infrastructure provision.” Paragraphs B3 to B8 of PPS12 also place specific emphasis on the need to take account of infrastructure such as sewerage early on in preparing Local Development Documents. Paragraph B3 in particular states: “The provision of infrastructure is important in all major new developments. The capacity of existing infrastructure and the need for additional facilities should be taken into account in the preparation of all local development documents.” It will be essential to ensure that the introduction of a portfolio of Local Development Documents (LDDs) does not prejudice adequate planning for water and sewerage infrastructure provision as this is an essential pre-requisite for development.	Noted
Thames Water Property (Carmelle Bell)	dmppo218	36 - Policy DM35 - Water	The inclusion of the supporting text to Policy DM35 is also welcomed. The text at paragraph 36.3 and in particular the reference to the Council supporting Thames Water in the delivery of new sewage treatment works at the Deephams site or an alternative location, is particularly helpful and strongly supported. Given the strategic importance of the delivery of the Deephams STW relocation project, we would however prefer it if this reference was contained within Policy DM35 and / or in the Core Strategy document. We have submitted detailed representations to the Core Strategy consultation in respect of	Noted, this recommendation will be taken forward in the DM policies Proposed Submission.

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			the Deephams STW project and we look forward to working with London Borough of Waltham Forest in the delivery of this scheme.	
Thames Water Property (Carmelle Bell)	dmppo217	36 - Policy DM35 - Water	As set out in our responses to the Preferred Options Core Strategy (January 2010), Thames Water was concerned that there was inadequate reference to the provision of the water and sewerage infrastructure necessary to support development, within the Core Strategy. We would prefer that policies in respect of water and sewerage infrastructure capacity are contained within the Core Strategy, however if Waltham Forest Council does not consider such policies appropriate to the Core Strategy document then it is essential that such policies are included within the Development Management Policies DPD. We are therefore pleased that Policy DM35 - Water is included within the Development Management Policies DPD and this Policy is strongly supported. In relation to Water Infrastructure the inclusion of bullet point A) will help to ensure that development does not take place ahead of the provision of adequate water and sewerage infrastructure. This will help to prevent potential adverse environmental impacts such as sewer flooding of property, pollution of water courses or low / no water pressure. Bullet point C) provides policy support for the provision of essential water and waste water infrastructure and is also very helpful. In respect of bullet point B), we would prefer that all new developments / dwellings are required to establish separate foul sewer and surface water drains, rather than only developments of 10 or more dwellings. We are concerned that the inclusion of the sentence, as written will lead to developers believing that the provision of sewer and surface water drains is acceptable for developments of less than 10 dwellings. As set out above the water efficiency targets set out under Policy DM11 are supported. We support the use of sustainable urban drainage systems (SUDS) where these are maintained properly. It should be noted however that poorly maintained SUDS can potentially increase the amount of runoff that is received by surface water sewers and can therefore increase the risk of sewer flooding.	Noted. It is considered that details currently mentioned in criteria B) of policy DM35 is appropriate. Reference is made to the maintenance of SuDS in paragraph 36.12.
The Greater London Authority (Giles Dolphin, Planning Decisions Unit)	dmppo269	36 - Policy DM35 - Water	TfL considers that reference could be made to encouraging increased use of waterways for freight transport.	Noted. The Council will include an additional bullet point in policy DM35 criteria F) to read as follows: *increased use of waterways for freight transport will be

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				encouraged
The Olympic Delivery Authority (Alex Savine, Chief Planner, Policy and Relationships)	dmppo69	36 - Policy DM35 - Water	Policy DM35 - Suggest that the final bullet point in Water Efficiency part D refers to rainwater as well as surface and grey water capture and re-use (and is included in section 36.8). Again suggest that the Water policy is moved to be closer to the sustainability policies DM11 and DM12.	Noted - this will be incorporated into the next iteration of the document. Reference will be made to DM11 and DM12 regarding water infrastructure and efficiency.
City of London (Paul Thomson, Superintendent of Epping Forest)	dmppo76	37 - Policy DM36 - Biodiversity	Policy DM36 should contain a clear commitment to protect the important biodiversity and green infrastructure assets like Epping Forest as the cornerstone for any future enhancements of the green infrastructure of the Borough green roofs should have a specific mention in this policy as a key way to protect and compensate for losses - particularly to brown-field sites as covered by Policy DM36 D).	Noted. The Council will include reference to green roofs (living roofs) in C) in the DM policies Proposed Submission.
Network Rail Property (Alasdair Robinson)	dmppo299	37 - Policy DM36 - Biodiversity	Biodiversity ... d) Where vacant or derelict land is awaiting redevelopment and has some value for nature conservation, the Council will expect it to be protected on a temporary basis. Disused trackside land is commonly designated for nature conservation/green corridors. Network Rail frequently requires access to the trackside in order to carry out essential maintenance works for the safe running of the railway. Much of the time, such works requires heavy machinery to be brought to the track and therefore removal of impeding trees and vegetation. Network Rail therefore asks that this be taken into account should the council look to protect trackside land for purposes of biodiversity.	Noted. Measures for mitigation and compensation must only occur in exceptional circumstances as outlined in A) of DM36. Essential maintenance would be regarded as an exceptional circumstance by the Council. Reference will be made in the justification of DM36.
The Olympic Delivery Authority (Alex Savine, Chief Planner, Policy and Relationships)	dmppo70	37 - Policy DM36 - Biodiversity	Policy DM36 - Suggest that a more explicit reference is made to brown and green roofs than is currently given in part C in terms of biodiversity and also in terms of urban cooling.	Noted. This recommendation will be taken forward in the DM policies Proposed Submission.
Her Majesty's Court Service (Agent: Miss Charlotte Handscomb, DPP LLP)	dmppo135	38 - Policy DM37 - Working with Partners and Infrastructure	As noted above, growth within the Borough places additional pressure on court facilities, and as such it is appropriate that the court service should benefit from contributions made through the Borough's prevailing s106/CIL payments regimes. As such, whilst we support the thrust of Policy DM37, which seeks to ensure development contributions are negotiated to ensure adequate social infrastructure is provided to facilitate new developments, we would request that 'criminal justice facilities' are included within the list of s106 contributions provided within the policy. This reflects the inclusion of criminal justice facilities as 'social infrastructure' within paragraph 3.79	Supported. Paragraph 38.18 is amended to read '.... Transport for London (TfL), Her Majesty's Court Service (HMCS) ....' to seek appropriate planning obligations to secure adequate infrastructure for proposed development.

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			of the draft London Plan, as referenced earlier. Further, HMCS is keen to work in partnership with the Council to ensure that court facilities benefit from planning contributions as necessary. As such, paragraph 38.18 of the DPD should be amended as follows: "The Council will seek to work with partners such as Homes and Community Agency (HCA), The Greater London Authority (GLA), Transport for London (TfL), Her Majesty's Court Service (HMCS)... to seek appropriate planning obligations to secure adequate infrastructure for proposed development."	
Leyton Orient Football Club and Matchroom Ltd (Agent: Mr Clive Thompson, Director, Woodhall Properties)	dmppo116	38 - Policy DM37 - Working with Partners and Infrastructure	E) Subject to viability with sustainability the main criteria.	Comments noted. Viability and sustainability matters are covered in the Planning Obligations and Community Infrastructure Levy regulations.
Network Rail Property (Alasdair Robinson)	dmppo297	38 - Policy DM37 - Working with Partners and Infrastructure	Planning Obligations Network Rail is funded to maintain the existing railway and do not have monies for enhancements, thus in order to upgrade capacity to meet additional demand we are reliant upon additional funding streams through redevelopment with third parties or maximising the commercial value of its estate. The provision of high quality railway infrastructure is a key component in the delivery of sustainable development therefore Network Rail welcomes and supports the Council's commitment to securing contributions towards the enhancement of public transport infrastructure. To this end, Network Rail would encourage the specific inclusion of 'rail-related infrastructure and services' within the document. Where land in our ownership is no longer required for operational railway use there is often potential for development that in turn would bring wider regeneration benefits for the area. Furthermore, much of our estate by virtue of its historical use is typically in very sustainable locations (i.e. brownfield land, and within or adjoining developed areas and good links to other modes of transport) and therefore ideally situated for redevelopment. Thus, it would appropriate for there to be policy which takes into account the scale and cost of works in negotiations over the overall planning obligation 'package' sought from Network Rail with regard to both developments which incorporate infrastructure improvement work within and developments on our land which generate mixed use or residential development with the proceeds reinvested back into the railway. Such a policy could be added to the document	Support noted. Comment would be considered at considered at the proposed submission stage.

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			along the lines of; 'Where development is undertaken to provide for significant improvements to public transport infrastructure, including increasing passenger capacity, consideration will be given to reducing, or waiving the standard charges where the derived funds will be allocated to the improvement of local infrastructure'. This policy could then apply to any development which significantly upgrades the public transport network - not only that of rail infrastructure.	
North East London NHS Foundation Trust (Agent: Mark Underwood, Drivers Jonas Deloitte)	dmppo376	38 - Policy DM37 - Working with Partners and Infrastructure	NELFT considers the planning obligations need to be structured and fair but also flexible enough to take into account the needs and requirements of specific sites. This policy should also take greater account of the need for development viability, particularly in the current financial climate.	Comments would be considered at the proposed submission stage.
The Mall Limited Partnership (Agent: Miss Marie Jasper, Associate Barton Willmore)	dmppo129	38 - Policy DM37 - Working with Partners and Infrastructure	Policy DM37 relates to Planning Obligations, we also note from the supporting text that a separate area-based planning obligation strategy is anticipated in relation to Walthamstow Town Centre. Planning Circular OS/2005: Planning Obligations sets out guidance to local Authorities of the use of planning obligations through the Section 106 process. Circular OS/2005 clearly sets out the requirements for obligations to be: • Relevant to planning; • Necessary to make the proposed development acceptable in planning terms; Directly related to the proposed development; • Fairly and reasonably related in scale and kind to the proposed development; and • Reasonable in all other aspects. Policy DM37'- Part C states that the Council may pool contributions relating to significant infrastructure. It is accepted that on occasions there may be a requirement to pool funds from other developments towards, for example, an upgrade of the strategic road network where that improvement can be justified as being required in relation to the development. However, the policy should specify a reasonable period within which the pooled contributions should be spent and we consider that 5 years would represent such a reasonable period. This is particularly the case, for developments where the build out can be much quicker than other forms of development. The passing of a longer period without spending contributions on mitigating the impact of the development would call into question whether the contributions are entirely necessary to make the proposed development acceptable in planning terms as required by Circular 05/05. Policy DM37 Part D Includes a list of s. 106 contributions. The policy should be clarified to make clear at not all contributions	Comments noted. Regarding suggestions to provide breaking down the S106 contributions list for residential, commercial and retail development to provide clarity. Details of the S106 requirements should be referred to the Planning Obligations SPD. The SPD is available at the Council website.

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			listed are applicable to all forms of developments, for example, it would be unreasonable to seek education contributions in relation to a retail development. Consideration should be given to breaking the list down into contributions sought for residential, commercial and retail developments to provide clarity to developers.	
The Olympic Delivery Authority (Alex Savine, Chief Planner, Policy and Relationships)	dmppo71	38 - Policy DM37 - Working with Partners and Infrastructure	Page 195 - Suggest that the OPLC should be listed at the top of section 38.15. Section 38.16 refers to “Olympic Links” but it is not clear what these are. Presumably the “park” referred to in the fourth bullet point is the Olympic Park.	Agreed. OPLC will be added to paragraph 38.15. At the 3rd bullet point, add "...and the Olympic links between Walthamstow and Stratford". At the 4th bullet point, add "......to the Olympic park".
The Olympic Delivery Authority (Alex Savine, Chief Planner, Policy and Relationships)	dmppo72	Appendix 1 - UDP Saved Policies Replaced	To aid understanding of the table, suggest that the right-hand two columns are renamed “Proposed Core Strategy policies which supersede the UDP Saved policies” and “Proposed Development Management Policies which supersede UDP Saved policies”, otherwise it could be read that the DMP listed are being superseded.	Comments would be incorporated at the proposed submission stage.
English Heritage (Nicholas Bishop, Regional Planning Advisor - London Region)	dmppo311	Appendix 2 - Monitoring Indicators and Targets	Appendix 2 - Monitoring Indicators and Targets SO12 - Heritage at Risk should be identified within the monitoring column, and the target should be removal of all assets from the register.	Amend the information relating to SO12 as follows: under the heading for Monitoring Indicators - insert 'Heritage at Risk Register'; under the heading for Main Targets - replace 'Number of Properties on the Heritage at Risk' with 'Removal of all assets from the Heritage at Risk Register'.
English Heritage (Nicholas Bishop, Regional Planning Advisor - London Region)	dmppo312	Appendix 3 - Key Evidence for Development Management Policies	Appendix 3 - Key Evidence for Development Management Policies Planning Policy Statement 5, Planning for the Historic Environment (PPS5) (2010) and its accompanying Historic Environment Planning Practice Guide (2010) should be cited within the evidence base, along with the Borough’s conservation area appraisals and management plans.	Agreed. The suggestion would be incorporated into Appendix 3.
English Heritage (Nicholas Bishop, Regional Planning Advisor - London Region)	dmppo313	Appendix 3 - Key Evidence for Development Management Policies	Preferred Options Sustainability Appraisal Report Page 40 - 11.3.1: PPG5 should more accurately be referred to as PPS5. It would also be worth referencing the Historic Environment Planning Practice Guide (2010). In addition, the “message” column should highlight the fact that PPS5 seeks to conserve heritage assets and the wider historic environment for its contribution to sense of place and local distinctiveness. This point could then be drawn out in 11.7.1, that protection of the historic environment ensures sustainable place-making and retention of local character, rather than merely protecting statutorily designated assets.	Comments would be incorporated in the appropriate sustainability appraisals documents.

Name/ Organisation	Comment ID	Chapter	Comments from Consultee	Council's Response
English Heritage (Nicholas Bishop, Regional Planning Advisor - London Region)	dmppo314	Appendix 3 - Key Evidence for Development Management Policies	Preferred Options Sustainability Appraisal Report Page 41 - 11.9.1: this section should refer to English Heritage's [delete "Buildings"] Heritage at Risk Register.	Comments would be incorporated in the appropriate sustainability appraisals documents.
The Greater London Authority (Giles Dolphin, Planning Decisions Unit)	dmppo265	Appendix 4 - Parking Standards	To ensure the efficient and appropriate use of dual use parking provision, a car parking management plan should be secured with developments. There is no mention of taxi provision within this section. Certain uses such as hotels, large scale office, retail and leisure uses generate demand for taxis and accordingly appropriate pick up and set down provision may be required. For some major developments, a dedicated taxi rank may also be appropriate. TfL generally welcomes the restraint based maximum parking standards, however the standards for some of the large scale non residential uses should be revisited to ensure that they are consistent with the principles of minimising vehicular trips. Standards for cinema, conference and other large scale leisure uses do not distinguish between highly accessible town centre locations (where policy DM14 would encourage the location of such uses) and less accessible out of town locations. Similarly, if the proposed parking standard were to be applied to a large sports stadium with a capacity of 60,000 spectators, this could result in 3000 parking spaces. At peak periods this would be likely to generate high levels of vehicular trips, increase congestion and deter the use of more sustainable modes. TfL considers that restraint based parking standards are also applied to these uses. Furthermore an event day management plan, by itself is not an appropriate means to ensure sustainable travel. This paragraph should be amended to advise that developers should refer to TfL's cycle parking standards in order to be consistent with the advice in paragraphs 18.18 and 18.21.	a) Agreed. This will be incorporated in the proposed submission document. b) Agreed. A reference to taxi provision will be included in the proposed submission document. Please also note that taxi provision is reference in the Core Strategy (CS paragraph 10.41 and 10.42). c) Agreed. This will be amended in the proposed submission document. d) Agreed. This will be amended in the proposed submission document. e) Agreed. This will be amended in the proposed submission document with updated Council's cycle parking standards.
The Mall Limited Partnership (Agent: Miss Marie Jasper, Associate Barton Willmore)	dmppo130	Appendix 4 - Parking Standards	Appendix 4 Parking Standards Recent changes to PPG13 mean that the central requirement to express maximum parking standards no longer applies. Instead it is intended that local authorities will set parking standards for areas dependant on individual circumstances. In line with this change to PPG13 we consider that Policy DM17 should be amended as indicated below, to allow maximum parking standards to be applied flexibility so that Individual circumstances can be fully taken into account. Suggested revisions for policy DM17"The Council will seek to effectively manage parking and ensure the	While the Council is no longer required to set maximum parking standards, it has the discretion to do so. The council considers restraint based parking policy imperative for the borough to manage congestion, air pollution and other negative impacts associated with vehicular traffic and to actively encourage travel by sustainable modes.

Name/ Organisation	Comment ID	Chapter	Comments from Consultee	Council's Response
			provision of safe and attractive parking facilities by: A. requiring developments to provide well designed, high quality parking facilities in accordance with the Council's maximum car parking and minimum cycle parking standards as set out in Appendix 4 unless Individual circumstances can be demonstrated to justify a different approach to parking provision;'"	
The Olympic Delivery Authority (Alex Savine, Chief Planner, Policy and Relationships)	dmppo73	Appendix 4 - Parking Standards	a) Suggest it is made clear that car parking should have sufficient manoeuvring space for vehicles to enter and exit the site in forward gear. b) Suggest that the residential uses table includes the requirement that a minimum of one wheelchair accessible space is required for development of 10 or more units, as set out at the end of page 231. c) In terms of the hotel, motels, boarding and guest house standard suggest that either the term “bedrooms” or “beds” is used - at the moment the wording in the table or definition do not match. d) Will it be clear whether a particular site is in a town centre or outside in terms of the public house, wine bars and restaurants standard? e) Suggest reference is made to provision of parking for motorcycle parking is made for takeaway use, and that reference to motorcycle parking provision in general is made in this appendix. f) For “other large scale leisure complexes” suggest it is made clear what is included in the floor space, for example would outdoor pitches count towards the floor space, given they generate trips not just the changing room building?	a) Noted. It is impractical to require this for single parking spaces but could be required for larger/communal parking areas. The Council will consider how to best incorporate this comment in the standards. b) Agreed. This will be incorporated in the proposed submission stage. c) Agreed. This will be amended in the proposed submission stage. d) Parking requirements are currently linked to PTAL. The standards will be amended in the proposed submission stage to take greater account of accessibility of town centres etc. e) Agreed. The Council will incorporate standards for motorcycle parking in the proposed submission stage. Motorcycle parking provision of take-away is considered too specific an issue to fit into the strategic nature of the document. f) The Council will clarify in the proposed submission stage, that outdoor space is included in the floorspace.
The Theatres Trust (Rose Freeman, Planning Policy Officer)	dmppo277	Glossary	Community Facilities: As the document has specifically mentioned theatres and cinemas we suggest that the bullet point for Museums and art galleries should be extended to read Museums, art galleries and other cultural facilities. So that guidelines are clear and consistent we also recommend an alternative description for this term as: community facilities provide for the health, welfare, social, educational, spiritual, recreational, leisure and cultural needs of the community. This will leave no doubt and will obviate the need for the phrase 'but not limited to ...' in the sentence on page 248. Social Infrastructure: We suggest that in the Glossary, the description for Social Infrastructure should undoubtedly include the term 'cultural facilities' for continuity in relation to Policy DM18 and Strategic Objective 14.	Comments regarding cultural facilities would be incorporated into the proposed submission stage.

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