

## LP1 CONSULTATION REPORT ADDENDUM

KEY	
Y	YES
N	NO
NS	NOT STATED
PP	Positively Prepared
Jus	Justified
Ef	Effective
CNP	Compliant with National Policy (NPPF)
DTC	Duty-to-Cooperate
Attend LP-Ex	Attend Local Plan Examination Hearing Session

The purpose of this LP1 Pre-Submission Consultation Report addendum is to capture a small number of representations were not included in the original consultation reports:

- KD8.1: [Schedule Representation in Plan Order](#)
- KD8.2: [Schedule of Representations in Respondent Name Order](#)

The Council expects the entry in this addendum to be a one-off event however, this will be kept as a live document to allow further representations to be logged if they emerge.

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Rep Number	Consultee Name	Policy	Para	Chapter	Page	Sound				DTC Y/N/ NS	Leg Y/N/ NS	Attend LP-Ex Y/N	Comment
						Y / N / NS							
						PP	Jus	Ef	CNP				
851	G Reeve	11		7	49	NS	NS	NS	NS	NS	NS	Y	I note that a number of Site Opportunity Locations were included in your LPI (Regulation 19) consultation but were not included in this LP2 Site Allocation Consultation, as they are not regarded as Key or Strategic Sites. I believe this is potentially misleading due to the impact development of these sites could have on the character of Highams Park and other areas across the Borough and these sites should not have been included in the Submission Version of the Local Plan consultation without proper consultation.
852	G Reeve	3		4	18	NS	NS	NS	NS	NS	NS	Y	I have reviewed the Proposed Submission Local Plan LP1 and comment as follows:  Although the Council's Labour Group pledged to campaign to reopen the Hall Farm Curve (HFC) in its 2018 election manifesto, Policy 3 - 'Infrastructure for Growth', which identifies priorities for key infrastructure projects, does not include the Hall Farm Curve. It is the most important link

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													<p>which aligns with one of the six golden threads ' Ensuring growth is sustainable and supported by infrastructure', the Council's commitment to introduce improvements and priority for sustainable modes of transport and to improve air quality in the Borough. It would connect Central Waltham Forest and North Waltham Forest, where it is planned to have an additional 8300 homes, with the key public transport interchange and growth area for employment, education and leisure opportunities at Stratford.</p> <p>To support the Council's commitment to reopening the Hall Farm Curve, it should be included in the list of projects in Policy 3.</p>
853	G Reeve					N	N	N	N	N	NS		<p>In addition, I share the same views as those expressed by the Highams Park Planning Group in their letter of 27th November 2020 that some policy statements in the Submission Version of the Local Plan (SLP) are unsound and/or the Council has failed in its duty to cooperate</p> <p>Due to the heavy reliance on Site Opportunity Locations in the SLP to meet the Council's housing targets, a more</p>

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													<p>rigorous and thorough consultation, as part of the LP2 Site Allocations Consultation, should have been undertaken regarding Site Opportunity Locations in Highams Park and across the Borough before their inclusion in Figure 4.1. in the SLP.</p>
856	Finbar	50/52 /60		13/14	NS	NS	NS	NS	NS	NS	NS	NS	<p>Last week I asked what has been done to look at the impact in mental and physical health of living in high population density buildings, I was referred to Policy 50. Upon reading the policy, this talks about ensuring inclusive access to public green and open spaces, sports and recreation facilities; protecting existing allotments and supporting the provision of new food growing spaces. This does not address the independent findings that have been widely reported of the impact on Mental and Physical Health of those living in flats opposed to houses with gardens. So once more I am asking what assessment has been made on the physical and mental health of living in high population density properties and what provision will be made, in the buildings go ahead, to deal with this extra burden on the NHS and local medical resources. Also looking at the proposals, I do not see any provision for the aforementioned public green and open spaces, sports and recreation facilities or food growing locations, therefore it looks that you are contravening your own policy.</p> <p>Furthermore I also asked about the impact of crime, I was advised that you plan to work with the developers to develop out crime, looking at the police.co.uk website (when it was available) and listening to the police on the ward meetings and reading the Neighbourhood Watch</p>

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Posts, since the developments of the Walthamstow dog track, we have seen not only an increase in crime in that area but also the surrounding areas, the policies you plan to use, how different are they from those used in the Stow Dog Track Development, what lessons have been learnt? Or should we be expecting further rises in crime, based on your analysis?

I was referred to policy 52 and 60 on this matter. P52. "requires all new development to incorporate principles and practises of 'Designing out Crime' and 'Secured by Design'" and

P.60 "It promotes the design of new development to create safe environments and reduce crime and disorder"

Both of these policies are lacking in detail, and based on the experience of the Stow Dog Track and other developments in the area are failing the local residents, furthermore it again does not address the question that was raised of once again the impact on crime in high population density properties vs low density and houses with gardens. Nor does it specifically highlight the types of crimes that would be expected. If we do not know what types of crimes occur in High population density properties, how can you be designing it out?

It feels like the questions asked last week that Waltham Forest fobbed off the residents and looking specifically at my questions they are left unanswered.

So, I would like to know

1. What specifically are Waltham Forest doing to protect it's residents of an increase in crime on the new proposed developments and surrounding areas?



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													<p>2. What types of crimes are seen more prominently in and around developments with flats/apartments generally, and what was the impact on crime on recent developments in the surrounding area? And what is the council doing to address this in future planned developments?</p> <p>3. What is the impact on mental and physical health of those living in high population properties, as proposed, opposed to low density properties and houses with gardens?</p> <p>4. What provision has the council made to either prevent these medical issues caused by living in flats or what is being done to handle the increase in medical issues that arise from living in these properties.</p> <p>5. What specific plans are in place for each proposed site to deliver, what is in the council's own policies, ensuring inclusive access to public green and open spaces, sports and recreation facilities; protecting existing allotments and supporting the provision of new food growing spaces.</p> <p>6. Finally, when we were talking about the 'green space' behind the leisure centre on New Road, there was some confusion about it being woodland vs wooded land, when talking about this could we please display this image so everyone knows what exactly we are talking about.</p>
857	Dennis Richardson	11		7		N	N	N	N	N	NS	NS	<p>I have reviewed the letter submitted by the Highams Park Planning Group and agree with the points highlighted as unsound or failure to cooperate</p> <p>The sites that of concern to me as I believe are totally unsuitable for development are as follows:</p>

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													<p>Highams Park Station and Car Park  Garages off Hale End Road  Garages off The Avenue  Wrigley Close (Adjacent to 85 The Avenue)  Garages between Castle Avenue and Handsworth Avenue  Garages off Richmond Avenue  Garages off Castle Avenue  Garages to rear of Clivedon Rd</p>
858	Tony Kneller	11		7		N	N	N	N	N	NS	NS	<p>I have reviewed your consultation document and should like to comment as follows:  1. I share the same views as those expressed by the Highams Park Planning Group in their letter of 27th November 2020 that some policy statements in the Submission Version of the Local Plan (SLP) are unsound and/or the Council has failed in its duty to cooperate.  2. Due to the heavy reliance on Site Opportunity Locations in the SLP to meet the Council's housing targets, a more rigorous and thorough consultation, as part of the LP2 Site Allocations Consultation, should have been undertaken regarding Site Opportunity Locations in Highams Park and across the Borough before their inclusion in Figure 4.1. in the SLP.</p>
859	Alex Garrick	11		7		N	N	N	N	N	NS	NS	<p>1. I share the same views as those expressed by the Highams Park Planning Group in their letter of 27th November 2020 that some policy statements in the Submission Version of the Local Plan (SLP) are unsound and/or the Council has failed in its duty to cooperate.  2. Due to the heavy reliance on Site Opportunity Locations in the SLP to meet the Council's housing targets, a more</p>

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													rigorous and thorough consultation, as part of the LP2 Site Allocations Consultation, should have been undertaken regarding Site Opportunity Locations in Highams Park and across the Borough before their inclusion in Figure 4.1. in the SLP.
860	Rajvir Bahey - Sport England			80		NS	N	N	NS	NS	NS	N	<p>Sport England are uncertain if the policy applies to outdoor sports provision and if so it is viewed that the policy is not consistent with NPPF paragraph 97. Sport Facilities, including playing fields and ancillary buildings, should only be lost if identified as surplus in borough wide strategic documents, such as the Playing Pitch Strategy, or the facilities are replaced with a facility of, at least, equivalent quantity and quality and in a suitable location.</p> <p>If the policy relates to outdoor sporting facilities including playing fields and ancillary facilities, then Sport England considers that the policy is not consistent with NPPF paragraph 97 and Sport England Planning Policies. Given the above an additional criterion should be added stating the below:</p> <ul style="list-style-type: none"> <li>• Sport Facilities, including playing fields and ancillary buildings, should only be lost if identified as surplus in a borough wide strategic documents, such as the Playing Pitch Strategy, or the facilities are replaced with a facility of, at least, equivalent quantity and quality and in a suitable location</li> </ul>
861	Nicky Callaghan	11		7		N	N	N	N	N	NS	NS	I wish to oppose the proposed development by the council to build on land behind Clivedon road and the roads that surround the garages ( 12. BLR_152 - Garages to rear of Clivedon Rd; backing on to the gardens of 1 to 27 Clivedon



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														Road, 84 to 116 Forest Glade and 8 to 24 Sheredan Road)also I oppose the plan to build on Highams Park Station & Car Park and building on other garage sites at the end of people’s back gardens . I have reviewed the letter that has been submitted by the highams Park planning group and agree with all of their comments and reasons why this should not go ahead hence I will not detail my reason in this email as I agree with the content of the letter sent by the highams park planning group on 27th November 2020
862	Richard Snape	11		7		N	N	N	N	N	NS	NS	<p>I endorse the views expressed by the Highams Park Planning Group in their letter of 27th November 2020 that some policy statements in the Submission Version of the Local Plan (SLP) are unsound and/or the Council has failed in its duty to cooperate.</p> <p>Due to the heavy reliance on Site Opportunity Locations in the SLP to meet the Council's housing targets, a more rigorous and thorough consultation, as part of the LP2 Site Allocations Consultation, should have been undertaken regarding Site Opportunity Locations in Highams Park and across the Borough before their inclusion in Figure 4.1. in the SLP.</p> <p>I object to the attempt to shoehorn additional residential development into every space currently occupied by garages which would generally lead to overcrowding and overlooking gardens.</p> <p>I object to the parking standards set out in appendix 1 and believe minimum car parking provision should be enforced rather than maximums particularly in areas of Ptal 1-4.</p>	
863	David Smith	11		7		N	N	N	N	N	NS	NS	<p>1. I share the same views as those expressed by the Highams Park Planning Group in their letter of 27th</p>	

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													<p>November 2020 that some policy statements in the Submission Version of the Local Plan (SLP) are unsound and/or the Council has failed in its duty to cooperate.</p> <p>2. Due to the heavy reliance on Site Opportunity Locations in the SLP to meeting the Council’s housing targets, a more rigorous and thorough consultation, as part of the LP2 Site Allocation. Consultation should have been undertaken regarding Site Opportunity Location in Highams Park and across the Borough before their inclusion in Figure 4.1 in the SLP.</p>
864	Sheryl Dutton	11		7		N	N	N	N	N	NS	NS	<p>1. I share the same views as those expressed by the Highams Park Planning Group in their letter of 27th November 2020 that some policy statements in the Submission Version of the Local Plan (SLP) are unsound and/or the Council has failed in its duty to cooperate.</p> <p>2. Due to the heavy reliance on Site Opportunity Locations in the SLP to meet the Council's housing targets, a more rigorous and thorough consultation, as part of the LP2 Site Allocations Consultation, should have been undertaken regarding Site Opportunity Locations in Highams Park and across the Borough before their inclusion in Figure 4.1. in the SLP.</p>
867	Marie Jasper/ Aviva Investors			4								NS	<p>Our client is generally supportive of the identification of Leyton Mills Retail Park as a Site Opportunity Location within a wider Strategic Location (Leyton) and Location for Growth (South Waltham Forest), where growth involving new homes and jobs with supporting infrastructure are to be focused (Policy 4 and Figure 4.1).</p> <p>We note that within the Strategic Locations generally, the Council intends to prepare Area-Based SPDs</p>

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													<p>and/or Masterplans to guide and co-ordinate development. The supporting text, starting at Paragraph 4.26, should clarify whether the SPD/Masterplan is intended to relate to the full extent of the Strategic Location, or whether a more focused area may be appropriate, in particular where Site Opportunity Locations are present.</p> <p>Draft Policy 4 states that within the South Waltham Forest Location for Growth, a minimum of 14,900 homes and 3,250 jobs are to be provided. However, draft Policy 9 states that within the South Waltham Forest a minimum of 16,000 new quality homes will be provided, 14,800 of which will be within the defined Strategic Locations. Clearly there is an inconsistency between the above figures, which should be addressed to ensure clarity regarding the minimum requirements. Additionally, we suggest that an indication is provided regarding the distribution of new jobs, within the South Waltham Forest Location for Growth, is provided, within supporting text.</p>
870	Mark Connell /GBN/RVL			9		N	N	N	N	N	NS	NS	<p>RVL and GBN support the recognition of Estate Way and Church Road as a site suitable for growth which can make a significant contribution to the borough's housing stock and employment opportunity.</p> <p>However, the wording of Policy 9 (H) is at odds with this ambition and unsound.</p> <p>2</p> <p>It has been clearly established a waste allocation for Estate Way is not supported by the North London Waste Plan. A requirement for Waste re-provision (either on the site or South Waltham Forest) would undermine the masterplan</p>

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being developed by the Council, which seeks to regenerate the land for a mix of uses, including residential. The masterplan does not include any waste services. With the agreement of all parties, waste service have already been re-located outside of the borough (Enfield) – as specified in the North London Waste Plan. Continued reference to a waste services reprovision in the draft local plan conflicts with this. The North London Waste Plan will be adopted in advance of the Waltham Forest Local Plan, creating a policy mis-match should Policy 9(H). The reference should either be deleted altogether or amended as follows:

**Change sought (if deletion not accepted).**  
**Policy 9 – South Waltham Forest**  
**H. Re-provides the waste services from Estate Way and Bywaters in line with the requirements of the North London Waste Plan;**  
**To**  
**H. Re-provides the Removal of the waste services from Estate Way in line with the requirements of the North London Waste Plan;**  
**Context**  
**GBN and RVL have undertaken extensive discussions for five years on the relocation of the waste facility. As described above, the site has a number of inherent problems which inhibit its use - both now, but increasingly so in the long term. With the encouragement of the Council (through the North London Waste Plan) and other stakeholders including the Environment Agency, an alternative site was acquired in Gibbs Road, Enfield. The acquisition was to be supported by the redevelopment of**

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Estate Way for non-waste uses. RVL are the freeholders of the Gibbs Road Site, and GBN Services, their sister company, operate the waste and recycling business. Both the August 2019 version of the North London Waste Plan and the more recent minor modifications to the plan (October 2020) specifically remove the site from waste designations.

3

Estate Way is deleted (WAF 41) and Gibbs Road inserted (ENF 37). The supporting text also changes makes it clear that Pulse being part of this safeguarding be removed.

It states:

“Two facilities in Waltham Forest (GBN Services and Pulse Environmental) have closed and their capacity has been replaced in a new facility operated by GBN services in Enfield. While the capacity has moved to a different Borough, there is no loss of capacity for North London as a whole. The new GBN facility is newly built but has been designed with sufficient capacity to replace that lost at the two Waltham Forest facilities and therefore, for the purposes of the plan the capacity of these facilities is assumed to remain the same. The new facility may also be able to provide capacity on top of what has been replaced, and this will be monitored2.”

For the avoidance of all possible doubt, the Gibbs Road site is already operational and subsuming the Waste quota from Estate Way. I trust that the above representations are helpful in refining the site allocation for Estate Way to remove reference to replacement waste facilities.

Summary

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																Policy 9 subsection H has the potential to blight development coming forward and would be inconsistent with other Council and London wide strategies if not amended. Without change the plan would be unsound on the basis of not being justified or effective.
871	Samantha Powell DfE			49												<p>Reserve right to attend</p> <p>Soundness</p> <p>3. As you will be aware, the primary focus at this stage of the Local Plan's preparation is on the soundness of the plan, with regard to it being positively prepared, justified, effective and consistent with national policy. The following comments set out DfE's view of the plan's soundness in respect of education provision.</p> <p>4. At Reg 18 stage we made specific suggestions to amend the wording of policy 57 'Education and Childcare Facilities', to ensure consistency with the NPPF and the draft London Plan.</p> <p>5. The LBWF consultation report includes extracts of the DfE Reg 18 consultation response, including reference 2275 on Policy 57. LBWF officer comments re: ref 2275 state: 'Noted for consideration'. No justification has been provided in the consultation report as to why the suggested wording should not be incorporated, and yet the wording of Policy 57 in the Reg 19 version of the plan remains unchanged.</p> <p>6. To expand upon the point made in respect of policy 57, primary schools in London typically have small pupil catchment areas and a significant number of pupils therefore have the opportunity to walk or cycle to school rather than being solely dependent on 'good public transport'. The existing policy wording may have the unintended consequence of excluding some sites which are</p>

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accessible by walking and cycling but do not benefit from as good public transport accessibility as others. As such, potentially suitable sites, particularly for primary schools, may be discounted.

7. The absence of change to the policy wording is of concern and ultimately impacts on the soundness of the plan, particularly as our suggested wording reflects that as agreed with GLA officers in respect of the same issues, and to be incorporated in the draft London Plan. We would welcome discussions with LBWF policy officers to expand and provide justification of our comments in respect of Policy 57 if this would be helpful.

8. LBWF officer comments in response to other parts of our Reg 18 response make reference to the Council's emerging IDP and Planning Obligations SPD. (see 2274 and 2277). It does not appear either of these documents which will support the Local Plan have yet been published; as such it is unclear if and how other comments we made with regard to education provision at Reg 18 stage will be incorporated or addressed in the Local Plan. We would like to see the IDP in advance of final submission of the plan to provide us with the necessary reassurance that the IDP clearly sets out the location, delivery timescales and funding mechanisms for new school places to support the levels of anticipated growth. Similarly we would welcome sight of the Planning Obligations SPD, not least to ensure it reflects and signposts DfE guidance with respect to developer contributions. If either the IDP or SPD have in fact been published, please forward copies or confirm relevant links by response and we will seek to provide comments to you as quickly as possible.





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													<p>1 I am not clear if the 1500- 1800 new homes mentioned include the huge number currently under construction . what date do you start counting from?</p> <p>2 The plan is hard to see in context. For example built in last 3 years, plus those currently under construction already add to the number of people in the borough . This figure needs to be made clear.</p> <p>3 the 1500 homes in the plan seems an underestimate given the number assigned to south of the borough in the plan? Is this a mathematical error?</p> <p>4 I have no objection to good design high rise blocks in the right place ie not over shadowing historic parts of the borough. Once historic or places of interest are compromised by high rise blocks ( above roof line of existing properties) the area is ruined for generations. Much like new developments of 1950s onwards that look boringly identical to any other urban sprawl.</p> <p>The blocks built in recent years are not exciting in the main and not much better than the estates built in 60s and now demolished.</p>
872	Hilda Varley			12 & 15	NS	NS	NS	NS	NS	NS	NS	NS	<p>5 My main concern is that there is evidence that infrastructure can and will be in place for new residents – public transport LBTH has no control over new bus routes, increased capacity, new tube/ rail or extra capacity there. The plan and meeting were just aspirations or assumptions it would appear at some time. This is very far from</p>

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													<p>certain. This is borne out by the fact public transport is already dangerously over crowded right now. Emphasis on cycling and walking are not solutions. In much the same way a representative of the Whipps Cross Hospital /Barts team suggested home birthing was a solution to a reduced capacity maternity service .</p> <p>Cycling and walking are not solutions to getting to work , weekly shops supermarket or market, days out, evening out locally or in town, ferrying children around, hospital appts. They are nice and desirable not practical. I find this a bit insulting suggesting anyone who objects to cycling and walking is OK with polluting cars.</p>
872	Hilda Varley			12	NS	NS	NS	NS	NS	NS	NS	NS	<p>6 Medical services LBTH has no control over new medical services The plan and meeting were just aspirations or assumptions it would appear at some time. This is very far from certain. This is borne out by the fact waiting time for a GP appt is unacceptable and dangerous. Also access to a dentist, pharmacist, paramedics eg physio therapy, The proposed new WXH was planned to have reduced capacity so A&amp;E will be overwhelmed when residents cannot get a GP appt. GPs and Dentists are self employed and can choose where to work. There is a dangerous low number of GPs in the country.</p> <p>Home care services are equally inadequate. I have a personal tragic experience of home care.</p>
872	Hilda Varley			12	NS	NS	NS	NS	NS	NS	NS	NS	<p>7 Education / Day care</p> <p>I have heard that school numbers are down since Corona Virus and Brexit. This trend might continue. However again LBTH has no control over new schools . We were told in</p>

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													the zoom meetings we were dependent on the Academy trusts and free schools who choose to open schools .
872	Hilda Varley			12	NS	NS	NS	NS	NS	NS	NS	NS	<p><b>Amenities</b> I understand that amenities will not be replaced like for like eg like the 2 swimming pools will be replaced with something but not the same. I fear the loss of 3 swimming pools in the borough ( including one in WF College) will not be replaced. Indeed there is nothing on the plan. Indeed 3 swimming pools might be replaced by a patch park in the locality.</p> <p><b>Other amenities are needed</b> such as shops, parks, open space, entertainment venues, pubs, markets ( famous walthamstow market is under threat, effect poorer families needing cheaper food etc), cinemas, theatres, galleries, adult education centres, childrens centres, nurseries). Indeed the iconic Chestnuts House building (last of the properties bequeathed to the borough for benefit of r of the resident) is being sold off to private developer for flats and offices.</p>
872	Hilda Varley			13/18	NS	NS	NS	NS	NS	NS	NS	NS	<p><b>Pollution</b> There is a concentration of development in south of the borough where traffic is already above normal for London . Pollution in the south of the borough is above London norms. There is no solution to this problem given except cycling and walking see above.</p> <p><b>Building density.</b> I could not see how the plans equate with national guidelines on housing density and open space. You cannot count of Epping Forest in the equation for housing density.</p>

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More recently evidence has emerged that many tower blocks do not take account of climate change and this is resulting in dangerously over heating dwellings. How much control the LBWf will have over this is not mentioned in the plan.

872	Hilda Varley			8	NS	NS	NS	NS	NS	NS	NS	NS	<p><b>PUBLIC Housing</b></p> <p>The plan does not identify homes for the poor to rent, that are permanent.. It was suggested that those on the housing waiting list could have the new affordable homes. This is disingenuous because there is affordable housing for sale and various renting options but they are outside the price range of the majority of people in on the council and housing association waiting lists. Average wages in this borough are below national average. If poorer people live in affordable homes the council of government will need to aty towards this cost . A drain on public finances. If the families get into difficulties they will be evicted by private land lords and become the responsibility of the council.</p> <p>The home likely to be built will not be suitable for families with more than 1 or 2 children. LBTH should take current housing lists and use this to specify permanay low rent public housing homes.</p>
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