



Walthamstow Town Centre Area Action Plan Consultation Report

Part I - Summary of Representations and Council's Response

Regulation 22(1)(e)

September 2013

INTERPRETING AND TRANSLATION ASSISTANCE

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<p>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.</p>	<p>આ અહેવાલ કે એનું સંક્ષેપ બીજી ભાષાઓમાં, મોટા અક્ષરોમાં, બ્રેઈલમાં, 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.</p>
<p>يمكن توفير هذه الوثيقة أو ملخصها بلغات أخرى أو بالطباعة الكبيرة أو بلغة بريدل أو على الشريط. ويمكن توفير خدمة ترجمة عند الطلب. وإذا احتجت من هذه الخدمات الرجاء الاتصال معنا على العنوان المذكور أدناه.</p>	<p>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।</p>
<p>অনুরোধক্রমে এই ডকুমেন্ট অথবা এর সারসর্ম অন্যান্য ভাষায়, বড় ছাপার অক্ষরে, ব্রেইল বা অক্লিপিতে, অডিও টেইপ বা বাজিয়ে শোনার কেসেটে অথবা অনুবাদ করে দেয়ার ব্যবস্থা করা যাবে। আপনার যদি এসব সেবাসমূহের প্রয়োজন হয়, তাহলে অনুগ্রহ করে আমাদের সাথে নীচের ঠিকানায় যোগাযোগ করুন।</p>	<p>ਇਹ ਪਰਚਾ ਜਾਂ ਇਹਦਾ ਖੁਲਾਸਾ 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।</p>
<p>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。</p>	<p>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.</p>
<p>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.</p>	<p>یہ دستاویز یا اس کا خلاصہ دیگر زبانوں، بڑے حروف، یا آڈیو ٹیپ کی شکل میں دستیاب ہو سکتا ہے، یا درخواست کرنے پر ترجمے کی سروس دستیاب ہو سکتی ہے۔ اگر آپ ان سروسز تک رسائی حاصل کرنا چاہتے ہیں تو براہ مہربانی ہم سے نیچے دیئے گئے پتے پر رابطہ کیجئے۔</p>
<p>Name _____ Address _____ _____ _____ Telephone No _____</p>	<p>CONTACT: Planning Policy Team Environment and Regeneration London Borough of Waltham Forest Sycamore House, Waltham Forest Town Hall Forest Road, Walthamstow, London, E17 4JF Telephone 020 8496 3000 Email: planning.policy@walthamforest.gov.uk Web site: www.walthamforest.gov.uk</p>

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Introduction

- 1.1 This report for the representations on the Walthamstow Town Centre Area Action Proposed Submission is divided into three separate parts:

Part I - Summary of Representations and Council's Response under Regulation 22(1)(e) **(this document)**

Part II - Schedule of Full Representations under Regulation 22(1)(e)

Part III - Copies of all representations on the Proposed Submission under Regulation 22(1)(d).

- 1.2 The table for Part I starting from page 4 is sorted in 'Chapter' order. Page 2 is a list of respondents to the consultation on the Proposed Submission.

Other Consultation Reports

- 1.3 The following reports are also relevant to the consultation on the Walthamstow Town Centre Area Action Plan Proposed Submission:

Statement of Consultation under Regulation 22(1)(c) - setting out how the London Borough of Waltham Forest has complied with the consultation requirements regarding the following:

The bodies and persons invited to make representations

How those bodies and persons were consulted

A summary of the main issues raised by the representations

How the representations made were taken into account.

Summary of Main Issues raised by representations on the Proposed Submission under Regulation of 22(1)(c)(v).

Schedule of Post Publication Minor Changes - setting out proposed changes in response to the representations received during the consultation on the Proposed Submission.

Walthamstow Town Centre Area Action Plan Consultation Report

Respondent ID	Respondent	Representation ID	Submission Type
151002	Thames Water Utilities Ltd - (Agent: Phil Jameson, Associate Planner, Savills)	wtcps32 -34	Rep Form
151476	Mr Simon Munk	wtcps10 - 12	Web
151495	Outdoor Advertising Association and British Sign & Graphics Association (Chris Thomas)	wtcps45 - 46	Rep Form
152301	Planning Policy Officer The Theatres Trust (Rose Freeman, Planning Policy Officer)	wtcps31	Rep Form
401992	Mr Shaun Hexter	wtcps1 & wtcps5 - wtcps9	Web
441261	English Heritage (Nicholas Bishop, Regional Planning Adviser)	wtcps39	Letter
497192	Barclays Bank Plc (Agent: Michael Fearn, Planning Director, Shireconsulting)	wtcps22	Rep Form
500040	Mr Philip Herlihy	wtcps13 - 19	
534011	Greater London Authority (Ms Sukhpreet Khull)	wtcps47 - 55	Letter
537451	Openreach (BT) Repayments Team (Mick Sharp, Repayments Project Engineer)	wtcps44	Letter
679398	Canal and River Trust (Mrs Claire McLean, Area Planner)	wtcps30	Email
680877	Environment Agency (Miss Eleri Randall, Planning Liaison Officer Environment Agency)	wtcps27 - 28	Rep Form
732145	Marine Management Organisation (Angela Atkinson, Stakeholder and Networks Officer)	wtcps21	Letter
746353	Sainsbury's Supermarkets Ltd (Chris Deeks, Assistant Planner, Turley Associates)	wtcps25 - 26	Rep Form
747924	Poldervaart	Wtcps2 - 4	Web
753667	Mr Robert Lindsay-Smith	wtcps35 - 38	Rep Form
760701	London Underground Limited (Shahina Inayathusein, Information Manager)	wtcps24	Letter
760705	Highways Agency (Ms Felicity Drewett)	wtcps23	Email
763275	Morrissions (Agent: Mr Anthony Ferguson, Senior Associate, Peacock and Smith)	wtcps20	Rep Form
763374	Natural England (Miss Francesca Barker, Planning Advisor)	wtcps29	Rep Form
763442	Sustrans (Ms Francesca Leadlay, Policy Advisor)	wtcps40 - 42	Email

Walthamstow Town Centre Area Action Plan Consultation Report
Summary of Representations and Council's Response on the Walthamstow Town Centre Proposed Submission
(54 Representations from 21 consultees)

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not	Summary of Representation	Council's Response	Outcome	Oral examination
151002	Thames Water Utilities Ltd - (Agent: Phil Jameson, Associate Planner, Savills)	wtcps33	Section 35 - Paragraph 35.13	Yes	Yes	Not specified	Supports the inclusion of paragraph 35.13 in respect of engagement with utilities providers to ensure that necessary infrastructure is planned and delivered to support growth.	Support noted.	No change	No
151002	Thames Water Utilities Ltd - (Agent: Phil Jameson, Associate Planner, Savills)	wtcps34	Section 35 - Paragraph 35.19	Yes	Yes	Not specified	The inclusion of paragraphs 35.19 and 35.20 within the Area Action Plan is supported.	Support noted.	No change	No
151002	Thames Water Utilities Ltd - (Agent: Phil Jameson, Associate Planner, Savills)	wtcps32	Section 13 - Policy WTC14 - Access to Sites of Nature Conservation	Yes	Yes	Not specified	A reference to Development Management Policy DM35 (Water) would be helpful to make it clear that development at the Key Sites will be expected to consider water and waste water infrastructure capacity issues.	Noted - A reference to DM35 - Water, is included in the first sentence of paragraph 13.20.	No change	No
151476	Mr Simon Munk	wtcps10	Section 10 - Policy WTC3 - Retail	Yes	No	Effective	WTC3 should provide planning protection and enhancement to independent retailers to these units.	Noted - Independent retailers are key to the 'success' and future regeneration of the town centre. This is clearly demonstrated in the AAP as the vision states, "promoting Walthamstow's unique retail offer by building on its historic market, high proportion of independent retailers...". The Council cannot protect the 'loss' of independent retailers in the centre per say, rather	Amend Paragraph 10.23 to include reference to support for independent shops.	

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								its can only protect the loss of retail floorspaces within the town centre. The AAP aims to support independent retailers in a number of ways. This primary this is through the development of the St James Street Quarter (para 10.23).		
151476	Mr Simon Munk	wtcps11	Section 11 - Paragraph 11.9	Yes	No	Effective	Support for sustainable transport measures. Need for cycle parking standards for new residential developments.	Support noted for sustainable transport measures. It is the Council view that "new development" (including residential development) in accordance with the Council's Development Management Policies would include the need for cycle parking in such development are not necessary.	No change	No
151476	Mr Simon Munk	wtcps12	Section 12 - Paragraph 12.25	Yes	No	Effective	The designation of only a small proportion of the historic shop fronts in the area amounts to a token effort to preserve or promote identity. This should be promoted more widely.	Noted - The designated shop fronts are considered to be high quality and special in character and this need to be protected. The principles in paragraph 12.23 will be applied to all shop fronts within the town centre.	No change	No
151495	Outdoor Advertising Association and British Sign & Graphics Association (Chris Thomas)	wtcps45	Section 12 - Paragraph 12.23	No	No	Justified; Effective; Consistent with national policy	Paragraph 12.23 is unique in seeking to control just about every individual element of shop fronts and their signs. It is without doubt exceptional in its zeal to remove virtually every facet of individual choice.	Noted - The Council consider that the identified shop fronts are special in character and identified due their uniqueness in the town centre. The Council will however delete the 4th, 5th and 6th sentences of paragraph 12.25 which will means that the Council will no longer seek to apply an Article Four Direction on the identified properties.	The Council will deleted the 4th, 5th and 6th sentences of paragraph 12.25.	No
151495	Outdoor Advertising Association and British Sign & Graphics Association	wtcps46	Section 12 - Paragraph 12.25	No	No	Justified; Effective; Consistent with national policy	In paragraph 12.25, advertisements cannot be controlled by Article 4 directions. All reference to "signage" in this paragraph is wrong in law	Noted - The Council consider that the identified shop fronts are special in character and identified due their uniqueness in the town centre. The Council will however delete the 4th, 5th and 6th sentences of paragraph	The Council will deleted the 4th, 5th and 6th sentences of paragraph 12.25.	No

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	(Chris Thomas)						and should be deleted.	12.25 which will means that the Council will no longer seek to apply an Article Four Direction on the identified properties.		
152301	Planning Policy Officer The Theatres Trust (Rose Freeman, Planning Policy Officer)	wtcps31	Section 10 - Policy WTC4 - Leisure, Entertainment, Culture and Tourism	Not specified	Yes	Not Specified	Include sui generis (which is explained in the Glossary) theatre in Policy WTC4 for consistency.	Noted - The Council will not include Sui Generis as part of the accepted uses in WTC4. Sui Generis includes a range of uses (e.g. launderette and car sales showroom). The majority of these uses would be unacceptable in the locations identified in WTC4. The Council are not opposed to the principle of a theatre being located within the centre (subject to detail of proposals), however including sui generis in WTC4 could lead to 'non-desirable' uses also being acceptable in principle.	No change	Not specified
401992	Mr Shaun Hexter	wtcps9	Section 9 - Paragraph 9.7	Yes	No	Positively prepared	Young couples do not prefer flattened accommodation.	Noted	No change	Not specified
401992	Mr Shaun Hexter	wtcps8	Section 9 - Paragraph 9.2	Yes	No	Justified; Effective; Not Specified	The AAP does not take cognisance of the changing world or retail. The AAP should therefore suggest a serious reduction of retail floor space. This AAP should plan for more retail moving to the internet. The planned lack of car parking - free car parking - is a serious threat.	Noted - While the Council recognise that there will be a growth in online sales over the Plan period, the Council evidence base demonstrates that there will still be considerable demand for shopping provision within the borough's town centres. Parking and loading do have an important role to play in our high streets. However, an increasing body of research evidence indicates that other factors, such as the quality of the local environment, type and mix of shops may be much more influential in people's choice of shopping locations. Recent studies conducted in London have found that the share of shoppers arriving by public transport, walking and cycling is greater than that of those that	Shopping/diversification of uses	Not specified

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								come by car (walking is the most important mode for accessing local town centres). Parking charges on 'privately owned' car parks are set by the private operators of the car parks in the centre. Parking charges on Council owned car parks are set by our Parking and Transport Services section. There are no plans to introduce 'free' parking within the town centre.		
401992	Mr Shaun Hexter	wtcps7	Section 25 - Opportunity Site 10 - Station Car Park Phase Two	No	No	Positively prepared; Consistent with national policy	Observes that this site is currently under construction.	Noted - The site which is currently under construction related to phase 1 of the station car park (fronting Hoe Street) which includes the development of a hotel and residential units. The AAP proposed 'phase two' of the site as an 'Opportunity Site'.	No change	Not specified
401992	Mr Shaun Hexter	wtcps6	Section 24 - Opportunity Site 9 - Selborne Walk Shopping Centre	No	No	Justified	Loss of the Town Square and Gardens should not be considered.	Noted - The justification for the proposed eastern extension of the Selborne Walk shopping centre is set out in the evidence base document Arcade site and Town Square Masterplan (2011). This document involved significant public consultation and has been formally adopted by the Council. Paragraphs 10.15, 10.16, 12.14, 12.15 and 12.16 provide justification for the potential eastern extension (and potential loss of the green space) whilst also clearly stating the need for any future proposals to improve and add value to this space as a whole.	No change	Not specified
401992	Mr Shaun Hexter	wtcps1	Section 11 - Paragraph 11.6	Yes	No	Not specified	The gyratory system is in great need of change. I think proposals on this should be subject to a more focused consultation. Suggestion	Noted - There are currently no plans to replace the building to the west of Hoe Street. Any proposals to change the gyratory system will involve stakeholder consultation.	No change	Not specified

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							that replacing the buildings on the west side of Hoe Street could address other concerns about the quality of the building stock and possibilities for a direct connection to the bus station.			
401992	Mr Shaun Hexter	wtcps5	Section 10 - Figure 10.2 - Eastern 'Mall Zone of Potential Extension'	No	No	Not specified	Retail space needs to be reduced across the LBWF, and especially in Walthamstow. No mention of taking shops out of business use and turning them into other uses. This would help address other employment and residential problems. This diagram 10.2 is not clear.	The Council's strategic priorities are to promote and enhance its town centres as the borough's main shopping destinations. Reducing the level of retail floorspace is considered to be contrary to this aim. According to the Council's evidence base, there is considerable scope for additional retail capacity in Walthamstow. 'Other uses' are supported as SO3 states, the Council aim to create "a vibrant, attractive and competitive town centre by.... encouraging a mix of uses including, leisure, tourism, cultural and community to ensure the centre is a place where people want to shop, work, spend leisure time and live." This objective is further supported through the development of the 'Leisure and Entertainment Zone' and the 'St James Street Quarter'. In addition paragraph 10.30 that vacant units will be promoted to 'start up' business to further broaden the town centre's offer and uses within it.	No change	Yes
441261	English Heritage (Nicholas Bishop, Regional	wtcps39	Section 12 - Policy WTC10 - High Quality Environment	Not specified	Not specified	Not specified	Proposed wording change to policy WTC10b for consistency with the National Planning Policy Framework (NPPF). In	Agreed - Include reference to English Heritage's Guidance on the Setting of Heritage Assets (2011).	Include a reference to English Heritage's Guidance on the Setting of Heritage Assets (2011) in paragraph 12.29. Amend WTC10b to state	Not specified

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	Planning Adviser)						the supporting text we recommend inserting a reference to English Heritage's Guidance on the Setting of Heritage Assets (2011).		"development close to (deleted) which forms the settings of heritage assets (underlined)..."	
497192	Barclays Bank Plc (Agent: Michael Fearn, Planning Director, Shireconsulting)	wtcps22	Section 10 - Policy WTC3 - Retail	Not specified	Not specified	Not specified	To be justified and consistent with National Policy, the Waltham Town Centre Area Action Plan needs to make it clear that uses such as shops, banks and building societies which contribute to the vitality, viability and diversity of town centres will be encouraged and that such active ground floor uses will be appropriate in primary shopping areas without restriction.	Noted - The concerns covered in this representation do not related to any policies in the AAP, rather relate to Development Management Policy DM26 - Managing Changes of Use in Town Centres. As stated, the representor has raised similar concerns through the Examination In Public in relation to the Development Management Policies DPD. As a result of the EIP, DM26 has been amended to allow for greater flexibility of uses in shopping frontages such as the Primary Shopping Frontage. It should be noted that policy DM26 will be used to assess planning applications in the primary and secondary retail frontages and the AAP area.	No change	Not specified
500040	Mr Philip Herlihy	wtcps13	Section 10 - Figure 10.2 Eastern 'Mall Zone of Potential Extension'	Yes	No	Justified	Concerned at the loss of the TS&G. This would seriously and permanently damage the character and amenity of the whole Town Centre.	Noted - The justification for the proposed eastern extension of the Selborne Walk shopping centre is set out in the evidence base document Arcade site and Town Square Masterplan (2011). This document involved significant public consultation and has been formally adopted by the Council. Paragraphs 10.15, 10.16, 12.14, 12.15 and 12.16 provide justification for the potential eastern extension (and potential loss of the green space) whilst also clearly stating the need for any future proposals to improve and add value to this space as a whole.	No change	Yes

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500040	Mr Philip Herlihy	wtcps16	Section 12 - Paragraph 12.15	Yes	No	Justified	Any reduction in the size of the TS&G would change the character of the space qualitatively, not just quantitatively.	Noted - It is the Council view that the space needs to be improved (as stated in 12.15). As the AAP clearly states, any plans to extend onto the TS&G would need to involve significant investment and improvement in the TS&G in order to 'add value' to this area of the centre.	No change	Yes
500040	Mr Philip Herlihy	wtcps17	Section 13 Figure 13.1 - Access to Nature	Yes	Yes	Not specified	The Town Square Gardens provide a refreshing open space with a well-chosen variety of trees, and this represents a significant natural facility, which should be protected.	Noted	No change	Yes
500040	Mr Philip Herlihy	wtcps18	Section 13 - Paragraph 13.9	Yes	Yes	Not specified	If there are to be 2,000 new homes within the Town Centre, then it is all the more important that the open space which the Gardens represent is not diminished. It is the sense of space which gives the Town Square and Gardens the unique quality.	Noted	No change	Yes
500040	Mr Philip Herlihy	wtcps19	Section 23 - Opportunity Site 8 - Town Square and Gardens	Yes	No	Justified	Improvement of the Town Square and Gardens should be sought e.g. picnic tables. These Gardens are a precious asset to local people. The Town Centre is some distance from any significant green space. Fully support the aspiration of expanding the Mall, but not at the expense of this relatively small and precious open	Noted	No change	Yes

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							space. If the Mall is to expand - as I hope it can - then expansion should be sought Westward, or vertically.			
500040	Mr Philip Herlihy	wtcps15	Section 12 - Paragraph 12.8	Yes	Yes	Not specified	The Town Square and Gardens are a valued space within the centre and should be protected.	Noted	No change	Yes
500040	Mr Philip Herlihy	wtcps14	Section 10 - Paragraph 10.16	Yes	No	Justified	Rejects the arguments that the TS&G is underused, especially in good weather.	Noted	No change	Yes
534011	Greater London Authority (Ms Sukhpreet Khull)	wtcps47	Section 1 - Paragraph 1.1	Not specified	No	Not specified	The submission AAP is not considered to be in general conformity with the London Plan in relation to density and car parking.	Re wtcps48 - The Council will amend paragraph 7.12 to state that Walthamstow is an area which is 'central' in character. Re wtcps54 - The Council will amend paragraph 11.10 to reference the need to limit non-residential car parking in the centre.	Re wtcps48 - The Council will amend paragraph 7.12 to state that Walthamstow is an area which is 'central' in character. Re wtcps54 - The Council will amend paragraph 11.10 to reference the need to limit non-residential car parking in the centre.	Not specified
534011	Greater London Authority (Ms Sukhpreet Khull)	wtcps49	Section 13 - Policy WTC 12 - Decentralised Energy Network	Yes	No	Not specified	The Mayor will support proposals in the Walthamstow Town Centre to minimise carbon emissions.	Noted	No change	Not specified
534011	Greater London Authority (Ms Sukhpreet Khull)	wtcps50	Section 11 - Policy WTC6 - Transport Improvements	Yes	No	Not specified	TfL continues to support the aspiration to develop a pedestrian link between Walthamstow Queens Road and Walthamstow Central station. The creation of a link between Queens Road and High Street is noted. TfL is satisfied that other issues previously raised in relation to freight and	Support noted	No change	Not specified

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							servicing trips which have not been addressed specifically in this AAP, are dealt with elsewhere in the Council's Local Development Framework.			
534011	Greater London Authority (Ms Sukhpreet Khull)	wtcps51	Section 11 - Paragraph 11.7	Yes	No	Not specified	The reference made at paragraph 11.7 to the Council's on-going interest in more substantial 'Major Scheme' funding is supported.	Noted	No change	Not specified
534011	Greater London Authority (Ms Sukhpreet Khull)	wtcps52	Section 11 - Paragraph 11.8	Yes	No	Not specified	TfL welcomes the wording in paragraph 11.8 recognising its strategic importance and reinforcing the need for it to be retained. TfL also welcomes the removal of the Courtney Place development site, given the importance of the existing bus stands.	Support noted	No change	Not specified
534011	Greater London Authority (Ms Sukhpreet Khull)	wtcps53	Section 11 - Paragraph 11.6	Yes	No	Not specified	The proposed wording in relation to simplifying the operation of the Hoe Street gyratory is therefore supported. TfL also notes the Council's intention to improve specific junctions, including at the entrance of the bus station. In these respects, TfL welcomes the Council's commitment to working with TfL and other partners to consider options which improve traffic movements, reduce	Support noted	No change	Not specified

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							bus journey times and improve both pedestrian and cycle networks.			
534011	Greater London Authority (Ms Sukhpreet Khull)	wtcps54	Section 11 - Policy WTC7 - Sustainable Transport	Yes	No	Not specified	Policies WTC6, WTC7 and WTC8, which are the document's principal transport policies, are broadly supported. Whilst the car-free approach to residential development is welcomed. Need for specific reference to the need to limit non-residential car parking, particularly for large scale developments such as cinemas, other leisure uses.	Note support for policies WTC6, WTC7 and WTC8 as well as the principle of car free development in residential development. The Council will amend paragraph 11.10 to reference the need to limit non-residential car parking in the centre.	The Council will amend paragraph 11.10 to reference the need to limit non-residential car parking in the centre.	Not specified
534011	Greater London Authority (Ms Sukhpreet Khull)	wtcps48	Section 7 - Paragraph 7.12	Not specified	No	Not specified	As currently drafted Para 7.12 is not in conformity with the London Plan. Walthamstow Town Centre is "Central" in its character setting and has a PTAL rating of 4 to 6, therefore, as set out in table 3.2 of the London Plan, densities ranging from 650-1100hr/ha are appropriate (not 200-700 hr/ha as currently quoted).	Noted - Given the nature and context of the area, the Council considers that 'Urban' best describes Walthamstow rather than 'Central'.	No change	Not specified
534011	Greater London Authority (Ms Sukhpreet Khull)	wtcps55	Section 1 - Paragraph 1.1	Yes	No	Not specified	The Walthamstow Town Centre AAP DPD is supported in its sites proposals, particularly the school extension proposal at Buxton Road. Consideration needs to be given to the housing density figures quoted in	Support noted for school extension. Given the Council considers 'Urban' to best describes the context of the town centre it is the Council view that the states densities for each site are 'optimal'.	No change	Not specified

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							the plan to ensure that the development opportunities within the town centre are optimised and of equivalent densities stated in the London Plan. Subject to the suggested housing and transport changes in relation to car parking reduction raised in the report, there are no other major strategic concerns with the document.			
537451	Openreach (BT) Repayments Team (Mick Sharp, Repayments Project Engineer)	wtcps44	Section 1 - Paragraph 1.1	Not specified	Not specified	Not specified	No comments on document - Seek to discuss future proposals with the Council	Noted	No change	Not specified
679398	Canal and River Trust (Mrs Claire McLean, Area Planner)	wtcps30	Section 1 - Paragraph 1.1	Not specified	Not specified	Not specified	No comments to make on the document.	Noted	No change	Not specified
680877	Environment Agency (Miss Eleri Randall, Planning Liaison Officer Environment Agency)	wtcps27	Section 13 - Paragraph 13.17	Not specified	Not specified	Not specified	Pleased to see that previous comments (particularly para 13.17) have been taken on board. Suggested amendment, "In particular, new development should reduce surface water runoff and aim to achieve green run off rates in accordance with policy 5.13 of the London Plan (2011)."	Accept proposed amendment	Change paragraph 13.20.second sentence to state: "In particular, new development should reduce surface water runoff and aim to achieve green run off rates in accordance with policy 5.13 of the London Plan (2011)."	Not specified

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680877	Environment Agency (Miss Eleri Randall, Planning Liaison Officer Environment Agency)	wtcps28	Section 24 - Opportunity Site 9 - Selborne Walk Shopping Centre	Yes	Yes	Not specified	Strongly support the inclusion of support for Green Roofs in paragraph 13.3 and in Opportunity Site 9 - Selborne Walk Shopping Centre.	Support noted	No change	Not specified
732145	Marine Management Organisation (Angela Atkinson, Stakeholder and Networks Officer)	wtcps21	Section 1 Paragraph 1.1	Not specified	Not specified	Not specified	MMO has no comments on this document	Noted	No change	Not specified
746353	Sainsbury's Supermarkets Ltd (Chris Deeks, Assistant Planner, Turley Associates)	wtcps25	Section 26 - Opportunity Site 11 - Sainsbury's Supermarket	Yes	No	Justified	Support that the Sainsbury's Store at 112 High Street has been identified as a Key Opportunity Site to allow for the potential redevelopment of the store. Support for the intensification of this site as a key retail destination the centre and encourage the continued use and occupation of the site as an important retail anchor. However considered that the requirement that development should provide smaller scale ground floor units with active frontages prejudices the design process. The Council should remove reference to the number of units and floorspace	Support noted for the identification of the site as an Opportunity site. The site proposal does not require the retail provision to be provided in smaller scale ground floor units. The site proposals set out indicative development parameters. As stated in paragraph 15.2, these will be applied flexibly and should any proposals depart from these parameter it should be supported with strong evidence and demonstration of how the proposals would contribute to the aims and objectives of the Plan.	No change	Yes

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							requirements as this is too prescriptive at this early stage.			
746353	Sainsbury's Supermarkets Ltd (Chris Deeks, Assistant Planner, Turley Associates)	wtcps26	Section 30 - Opportunity Site 15 - South Grove	Yes	No	Consistent with national policy	Proposals on South Grove should apply the sequential and impact assessment requirements of the NPPF.	Noted – The site is considered to be in a town centre location and has been allocated through the development plan process and it is the Council's view that the sequential assessment and impact assessment is not required.	No change	Yes
747924	Poldervaart	wtcps4	Section 25 - Opportunity Site 10 - Station Car Park Phase Two	No	No	Not specified	Concern at the building heights. States Walthamstow's uniqueness is in its 'liveability' e.g. it does not feel like Canary Wharf or other soulless centres - buildings are at a human scale and there are fine views.	Noted - As policy WTC9 states, the AAP will, "set a framework for building heights of new development to be sympathetic in scale to the predominant 2-3 story context...." The majority of opportunity site are proposed building heights which are 4 storeys or less. Walthamstow Town Centre is one of the most accessible locations in the borough and as such is an appropriate location for higher density development.	No change	No
747924	Poldervaart	wtcps3	Section 24 - Opportunity Site 9 - Selborne Walk Shopping Centre	No	No	Not specified	TS&G is a valuable asset. Instead of reducing the size of the TS&G, seeks improvement e.g. cafe and art fairs. Suggests removal of the big screen.	Noted - The justification for the proposed eastern extension of the Selborne Walk shopping centre is set out in the evidence base document Arcade site and Town Square Masterplan (2011). This document involved significant public consultation and has been formally adopted by the Council. Paragraphs 10.15, 10.16, 12.14, 12.15 and 12.16 provide justification for the potential eastern extension (and potential loss of the green space) whilst also clearly stating the need for any future proposals to improve and add value to this space as a whole.	No change	No
747924	Poldervaart	wtcps2	Section 19 -	No	No	Not	Does not support a new	Noted - As policy WTC9 states, the	No change	No

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			Opportunity Site 4 - Tax Office on Corner of Church Hill and Hoe Street			specified	building above 4 storeys. It does not complement any of the surrounding buildings on Hoe St or Stainforth St, nor on Church Hill.	AAP will, "set a framework for building heights of new development to be sympathetic in scale to the predominant 2-3 story context...." The majority of opportunity site are proposed building heights which are 4 storeys or less. The sites which are proposed to be higher than this are in the most accessible locations such as close to Walthamstow Station.		
753667	Mr Robert Lindsay-Smith	wtcps35	Section 10 - Paragraph 10.17	Yes	No	Justified	Larger retail units, in excess of 400 sq.m, should be resisted as they will compete with the small independent clothing retailers in the market.	Noted - As stated in paragraph 10.17. Due to the historical development of the centre, the nature of the size of retail units is 'small'. This means 'higher quality' multiple retailers do not have sufficiently sized units to allow them to locate within the centre, leading to the centre missing out on significant investment opportunities. The provision of 'larger' modern units will provide 'higher end' retailers with sufficiently size units to be able to locate within the town centre. It is the Council's view that providing for 'larger' retailers whilst also supporting independent retailers is the most appropriate strategy in terms of improving the retail offer in the centre.	No change	No
753667	Mr Robert Lindsay-Smith	wtcps36	Section 12 - Paragraph 12.14	Yes	No	Justified	Reject the arguments, in section 10.7, as a justification for expansion onto the TS&G.	Noted - the rejection to arguments in 10.7. It is agreed that an amendment to paragraph 12.32 should be made to include a reference to the use of public art to improve blank frontages in the centre.	Change paragraph 12.32 to include a reference to the use of public art to improve blank frontages.	No
753667	Mr Robert Lindsay-Smith	wtcps37	Section 12 - Paragraph 12.15	Yes	No	Justified; Effective	Disagrees with paragraph 12.15 and proposes it should be deleted.	Noted - Paragraph 12.15 is supported by the finding of the Town Square and Garden's Masterplan and is thus retained as justification.	No change	No

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753667	Mr Robert Lindsay-Smith	wtcps38	Section 12 - Paragraph 12.16	Yes	No	Justified	12.15 is also contrary to WTC13 (a) and WTC10 (h).	Noted - It is the Council view that paragraph 12.15 is not contrary to either WTC13 (a) which states, "resist the loss of existing social infrastructure in the centre...." or WTC10 (h), which states, "enhance and improve the quality of green spaces throughout the centre". As defined in the glossary, social infrastructure does not include 'green spaces' or 'parks' and so is not applicable. As both paragraph's 12.15, 12.16 and opportunity site 8, 9 clearly states that any proposals for extension need to "improve", "enhance" and "add value" to the Town Square and Gardens which WTC10 (h) seeks to achieve.	No change	No
760701	London Underground Limited (Shahina Inayathusein, Information Manager)	wtcps24	Section 1 - Paragraph 1.1	Not specified	Not specified	Not specified	No comments to make at this stage of the document's development.	Noted	No change	Not specified
760705	Highways Agency (Ms Felicity Drewett)	wtcps23	Section 1 - Paragraph 1.1	Not specified	Not specified	Not specified	No further comments to make at this final stage of consultation.	Noted	No change	No
763275	Morrisons (Agent: Mr Anthony Ferguson, Senior Associate, Peacock and Smith)	wtcps20	Section 30 - Opportunity Site 15 - South Grove	Not specified	No	Justified; Effective; Consistent with national policy	Endorses the Council's vision for a mixed-use (retail and residential) redevelopment scheme on this site, but strongly challenges and objects to the draft site allocation on the grounds it is overly prescriptive and does not allow sufficient flexibility to ensure deliverability and viability. As it stands,	Noted - The Council agree with the proposed amendments to WTCP15 relating to the context section, retail floorspace, number of units and activity. The Council reject the proposed changes to Anchor Store. The Council has proposed additional wording in minor amendment WTCP151.	The Council will amend the Policy WTCP15 as follows: Context - first paragraph, first sentence: The under-utilised South Grove site... Context - second paragraph, first sentence: The immediate area is generally a mix of retail , office, storage.....	No

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							the draft wording in Opportunity Site 15 - South Grove is unsound in its current form, because the delivery and viability of the site is threatened having regard to the advice in the NPPF.	<p>The Council reject proposed changes to Building Height as the Council consider building heights of between 3 - 7 as appropriate for the context of the site.</p> <p>The Council reject proposed changes to Traffic Management as this section highlights a key challenge which any application for the site will need to consider and manage when developing proposals.</p> <p>The Council reject proposed changes to Existing Trees section as it is the Council's view that it is always necessary to seek to retain trees.</p>	<p>Retail Floorspace: 5,000 - 10,000 sq.m</p> <p>Number of Units: 90 - 300</p> <p>Activity: Where proposals include a superstore/foodstore and/or other large footprint uses....</p>	
763374	Natural England (Miss Francesca Barker, Planning Advisor)	wtcps29	Section 13 - Policy WTC14 - Access to Sites of Nature Conservation	No	No	Consistent with national policy	The AAP should include criteria based policies for protected biodiversity and geodiversity sites, distinguishing between international, national and local sites (NPPF Para 118).	Noted - A policy relating to protecting biodiversity and geodiversity has been included in the Council's Development Management Policies DPD (Policy DM36) which would also apply in the AAP area.	Amend paragraph 13.18 to include reference to its international importance and the need for increase access not to have any detrimental effects on the area.	No
763442	Sustrans (Ms Francesca Leadlay, Policy Advisor)	wtcps40	Section 11- Policy WTC7 - Sustainable Transport	Not specified	Not specified	Not specified	Support the plans to improve the pedestrian and cycling environment. Support the strategic objectives, particularly Strategic Objective 6. Advocate for the implementation of traffic calming measures including a default 20 mph speed limit zone in the town centre.	Support noted	No change	Not specified
763442	Sustrans (Ms Francesca Leadlay, Policy Advisor)	wtcps41	Section 12 - Policy WTC9 - Design and	Not specified	Not specified	Not specified	Seek improvements are made to the urban realm and improving provision	Support noted - Policies WTC9 and WTC7 all seek improvements to cyclists and pedestrians.	No change	Not specified

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	Advisor)		Place Making				for cyclists and pedestrians. Support improvements to wayfinding and linking to surrounding areas.			
763442	Sustrans (Ms Francesca Leadlay, Policy Advisor)	wtcps42	Section 35 - Paragraph 35.2	Not specified	Not specified	Not specified	Community Infrastructure Levy to be spent on improving accessibility and connectivity for pedestrians and cyclists	Noted - As stated in paragraph 35.2, the Council will seek planning obligations in relation to sustainable transport. The Council is in the process of developing a local CIL. It is anticipated that areas which improve accessibility and connectedness for cyclists and pedestrians will be included.	No change	Not specified



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