

From: Howard Green <[REDACTED]>
Date: Sun, 22 Jan 2023 at 12:56
Subject: Response to LBWF Draft Local Plan
To: <[REDACTED]>, <[REDACTED]>
Cc: planning.policy@walthamforest.gov.uk

Dear Ms Copsey

Response to LBWF Draft Local Plan

1. I am a retired Fellow of the Royal Institution of Chartered Surveyors: Planning and Development Division and spent 50 years working in Development Management - both local authority and private practice.
2. I have been a resident of Highams Park for 38 years.
3. I submitted comments on the LBWF Draft Plan in September 2019 but these were not referred to in the Consultation Report published in June 2020. Following my lodging a complaint they were located and I received what must be regarded as a meaningless 'standardised' response.
4. Did LBWF inform the Examiners of their error in my case and indeed are the Examiners aware of any other responses which were not considered at the appropriate stage?
5. My present comments address questions raised by the Examiners and refer to three of my original comments ie:-
 - (a) The (now) *upwardly* revised growth targets for sites in Highams Park are too high;
 - (b) The suggested storey heights for developments in the Skyline Study of November 2021 are inappropriate and pay no regard to the character of Highams Park; and
 - (a) These proposals so far as they specifically relate to Highams Park , if incorporated in the Local Plan, would destroy the character of the area.
6. As I understand it the Examiners are concerned that the high housing target figures could have adverse affects on, amongst other things, the character and amenity of the Borough and they questioned why LBWF were proposing a higher provision than set out in the London Plan. (I believe 50% higher).
7. In respect of these issues I fully endorse the views set out in HPPG letter of 17th January but will make a few further comments.

8. The HPPG letter refers to two sites in Highams Park where six to eight storey developments are envisaged ; 472-510 Larkshall Road and the Highams Park Industrial Estate.

9. The latter adjoins the recent 'Tesco' development of four storeys which relates well to the centre - reducing to two storeys adjacent to the 1930s building in The Broadway; whereas flats developments of twice that height are proposed along the remainder of Larkshall Road.

10. If the housing 'targets' for these sites were reduced to the London Plan target then the 'necessary' storey heights would reduce to between four and six. Properly designed four storey development along the Larkshall Road frontage would be acceptable but *not* six.

11. I ask that the Examiners look at the recent *five* storey residential developments in Fulbourne Road Walthamstow E17 (the other side of the North Circular Road) to gauge what this local authority apparently consider acceptable in an area of predominantly Victorian dwellinghouses. It is evident that unacceptable storey heights which would be completely out of character with this part of Highams Park would be necessary to achieve the target figures LBWF are envisaging.

12. With regard to 472-510 Larkshall Road we have the interesting situation that whilst the Draft Local Plan envisages a development of six to eight storeys LBWF, as local planning authority, actually *refused* planning permission in March 2022 for a six and seven storey development because, amongst other things, "*....by reason of building height....(it) would be a visually incongruous and an out of keeping form of development that would harm the character and appearance of the Highams Park District Centre*". (Appln Ref No 203040).

13. As referred to in the HPPG letter that decision was subject of a six day Public Inquiry finishing on 1st December 2022 (PINS Ref No 33044178).

14. Whilst the Inspector's decision is awaited that refusal clearly shows that the local planning authority do not consider a development of just six and seven storeys to be acceptable on that site. This would seem to be somewhat of a contradiction given the six to eight storeys referred to in Skyline Study. That recent decision surely undermines the basis of development in Highams Park as envisaged in the Draft Plan.

15. Obviously the Inspector's decision is awaited with interest but it seems to me that even if she allows the appeal on the height issue the authority's decision to resist just a six and seven storey height development in the *centre* of Highams Park must indicate that such heights would be unacceptable on the Larkshall Road site.

16. On the other hand, if she upholds the decision on this issue then it would vindicate the Examiners' and local residents' concerns about the densities of residential developments being put forward by the authority for the Borough and, in this case, Highams Park.

17. In conclusion and in response to the Examiners' questions:-

- The proposed housing targets are too high and should be reduced to London Plan recommendations
- The suggested heights for sites in Highams Park are also too high.
- Those present targets, taken together, would lead to unacceptably high and intrusive developments in Highams Park which would destroy its character; the protection of which, of course, is an aim of the Local Plan
- This has, in fact, been acknowledged by the local planning authority in its recent refusal of permission in relation to the proposed development at 480-510 Larkshall Road.
- Site allocations should not, therefore, include either housing target figures or storey height 'guidance'.
- Obviously, land in London is a valuable resource which must not be wasted and recent developments in Highams Park at Tesco's and beyond have shown that it can be accomplished whilst respecting the character of an existing area but intensive developments such as those presently envisaged would destroy the character of Highams Park.
- If the Plan progresses in its present form the Examiners' would be basically granting outline permission for eight storey developments on the two sites.
- As an alternative there should be a general statement that land should be utilised to its fullest extent (which, of course, is a given) but regard must be had to the character of the surrounding area. In that respect it would seem obvious that sensitively designed development of four storeys in height along the Larkshall Road frontage with higher development in the 'hinterland' of the site would be acceptable. I use the word 'sensitively' because slab blocks such as those in Fulbourne Road, Walthamstow would not be appropriate.

18. I confirm would like to attend the appropriate hearing session.

19. I have sent this email to the two email addresses I have. Please acknowledge receipt.

Yours sincerely

Howard Green FRICS

[REDACTED]
[REDACTED]