

Mrs Audrea Copsey  
Planning Manager

22<sup>nd</sup> January 2023

Dear Ms Copsey

**Re: Response to Waltham Forest Local Plan (LP1) ‘Shaping the Borough  
Further matters, issues and questions (MIQs), Stage 2 topics**

These comments concern the Highams Park area and aim to address the following questions raised by the Examiners.

1. 2.4 Overall, is the scale and distribution of housing and employment growth justified, including with regards of general conformity with the London Plan’s housing target for the Borough, flood risk, the effect on Habitats Sites, and the effect on air quality? Are any modifications necessary for soundness?
2. 3.1c Is it appropriate to rely to such a degree on future housing allocation in LP2
3. 6.6 Overall, is the approach to tall building and building heights positively prepared, justified, effective, consistent with national policy, and in general conformity with the London Plan? Are any main modifications, including to Policy 57, necessary for soundness?

Also referenced are “Examination Stage 2 Topic Paper LPE30 – Local Plan - September 2022”, “LPE46.1 Skyline Study – November 2021” and “The Highams Park Neighbourhood Plan”

**In general** my comments are that in *question 1. above*, the housing target for Highams Park is 540 dwellings on page 24 of the Local Plan whereas it was 400 in the Local Plan and on page 229 it is given as 585, which is 46% over the 400 figure and has not been consulted on by local residents. The lower figure of 400 was consulted on in 2020 and received much negative comments from local residents including from The Highams Park Planning Group; leaving the feeling that the Council are not listening to local residents. I doubt the soundness of the proposed dwellings in the 4 sites which comprise the 585 figure. The 4 sites combined do not have enough ground area to make 585 dwellings without making them very small or many stories high which will probably not be in keeping with their surroundings

**A) 472-510 Larkshall Road and James Yard**

This site is adjacent to Highams Park Station. This would have been a seven story development of 68 dwellings covering about half of the site. Planning permission was refused and the developer has appealed. The resulting 6 day public enquiry finished on the 1<sup>st</sup> December 2022 and the Inspector’s decision is awaited. I attended (in person or via Teams) almost all of the public enquiry.

The Council robustly defended their refusal of the planning permission. They argued that the proposed development by reason of height, scale and massing would be visually incongruous and ‘out of keeping’ form of development that would harm the character and appearance of the Highams Park District Centre.

The Council defended their position quoting many policies including the Neighbourhood Plan, the National Design Guide, Local Plan, Urban Design SPD and LPE46.1 Skyline Study. These encourage developers to make a positive contribution to the character of existing buildings and addresses building height which should be in keeping with the surroundings.

## **Highams Park Industrial Estate**

This is the other side of Larkshall Road to the James Yard development. This site is currently a light industrial estate and could become a mixed development of residential and light industrial. Joseph Homes were surprised at the negative feedback their plans received, when unveiled, concerning the adverse impact on the character of the area. The Council's Skyline Study shows a 6 to 8 storey development. The 400 dwellings planned for this development is again too high a figure and follows the proposed James Yard development which was rejected as too dense.

## **Larkswood Leisure Centre (Nursery and land to rear of Larkswood Leisure Centre)**

There was considerable opposition from local residents when the Council consulted on a 7 storey block of 72 dwellings. It was a gross over development of the site given that it is adjacent to two local green spaces (semi-ancient woodland). The wildlife would suffer from the light and noise from the block of flats and increased footfall. The development is out of character as the housing around comprises 2 storey houses. Further, that there is insufficient onsite parking for such a site. The Local Plan has a target of 280 dwellings for this area which is unsound for these reasons.

### **In conclusion:**

**Question 1 overleaf** Additional dwellings are needed but any development must respect the existing character. The housing targets are clearly excessive as has been demonstrated by the Council's planning departments refusal of the Planning Permission being refused by reason of height, scale and massing would be visually incongruous and an 'out of keeping' form of development that would harm the character and appearance of the Highams Park District Centre.

**Question 2 overleaf** Given the reasons stated above it is obvious that the future housing allocations given in LP2 are not practical in the case of Highams Park. It is likely that they are very optimistic across the Borough.

**Question 3 overleaf** The actual height allowed in any particular site is better determined by the Council when plans are presented to the Council for their approval. They can then decide what is suitable for the environment in which any development is proposed. Target heights should be removed from site allocations.

Yours sincerely,

John Avis

Long term resident of Highams Park