



**'Shaping the Borough' - Waltham Forest Local
Plan (LP1) Examination**

**RESPONSE TO FURTHER MATTERS, ISSUES AND
QUESTIONS**

**MATTER 6: BUILT ENVIRONMENT, HERITAGE,
AND DESIGN**

January 2023

MATTER 6: BUILT ENVIRONMENT, HERITAGE, AND DESIGN

Tall Buildings

6.1 Is the approach to tall buildings and building heights set out in the Topic Paper (LPE30 section 3.5) and in the Statement of Common Ground (LPE27) justified and in general conformity with the London Plan?

The approach to tall buildings set out within the Examination Stage 2 Topic Paper (LPE30) is both fully justified and in general conformity with the London Plan; a position that has been confirmed by the Mayor of London (see the Statement of General Conformity with the London Plan (LPE38) and the original response to MIQs matter 6 Q132).

The London Plan is clear that tall buildings can form part of a plan-led approach to managing future growth, particularly in order to make optimal use of the capacity of sites with good public transport connectivity and access to services and facilities. In order to ensure that tall buildings play a positive role in shaping the character of an area, the London Plan requires boroughs to determine and identify locations where tall buildings may be an appropriate form of development, in line with London Plan Policy D1, London's Form, Character and Capacity for Growth.

In July 2021, the Council wrote to the Mayor of London requesting his opinion as to whether further amendments to the draft Local Plan – as submitted to the Secretary of State on 30 April 2021 (KD1) – were necessary to bring it into general conformity with the new London Plan (2021). The opinion of the GLA at the time was that the submitted Local Plan needed further modifications in order to ensure general conformity. Officers worked collaboratively to agree appropriate modifications, as recorded in the Statement of Common Ground, March 2022 (LPE27). Subsequently, in his letter of 2 September 2022 – Statement of General Conformity with the

London Plan (New) (LPE38) – the Mayor confirmed that, if implemented, these agreed amendments would bring the draft Local Plan into general conformity with the London Plan.

As a result of the extensive collaboration with the GLA, and as set out in the Statement of Common Ground (LPE27), the Council proposes the modification of Policy 57 from the Regulation 19 Preferred Submission Version of the Local Plan – “Taller and Tall Buildings”, into two separate policies. One to be entitled “Tall Buildings” (removing the reference to “taller buildings”) and the other “Building Heights”. This revised approach ensures that the definition of what constitutes a tall building in the borough – and the policy tests any application for a tall building would be assessed against - is sufficiently clear.

The revised “Tall Buildings” policy conforms with Policy D9 of the London Plan by setting out the borough’s definition of tall buildings as those of 10 or more storeys. Following further discussion with the GLA, it is also proposed to include a height of 30m above ground level to the definition of tall buildings in Waltham Forest.

Following modification, the Plan will also set out, “based on local context” (London Plan Policy D9), spatial locations where tall buildings could be supported. These are appropriate sites where a “Transition” or “Transformation” approach to character-led intensification is appropriate, in line with Policy 8 “Character-led Intensification” and subject to meeting all relevant planning policy tests.

For noting, following further discussion with the GLA, it is also proposed to add one further modifications to the Tall Buildings policy to capture the importance of applicants assessing the visual impacts of any tall building

proposed on the extended background zones to London View Management Framework views.

All sites identified for tall buildings are located within Strategic Locations and all meet the locational criteria set out in the Regulation 19 Preferred Submission Version of the Local Plan, in accordance with the London Plan Policies D1 and D9. As required by the London Plan, all sites identified as potentially suitable for tall buildings are shown on a map that will be included in the Plan (see Figure 6.1 below).

The Local Plan's approach to tall buildings is justified and supported by detailed evidence in the form of the Characterisation and Intensification Study (LPE45) (also in the Evidence Base EB2.1), the Skyline Study (LPE46), and the wealth of masterplanning work undertaken to date in support of a character-led approach to intensification. This includes:

- LPE53 Blackhorse Lane SIL Masterplan Stage 1 (Baseline Report)
- LPE54 Blackhorse Lane SIL Masterplan Stage 2
- LPE48 Leyton Leisure Centre feasibility study
- LPE49 Leyton Bus Depot Feasibility Study
- LPE50 Stanley Road Car Park Feasibility Study
- LPE51 Walthamstow Town Centre Development Framework Brief
- LPE52 Leyton Mills Development Framework
- LPE55 Lea Bridge Area Framework
- LPE56 Chingford Mount Town Centre Framework
- LPE57 Leytonstone Town Centre Area Framework
- LPE58 South Leytonstone Area Framework
- LPE59 Forest Road Corridor Area Framework.

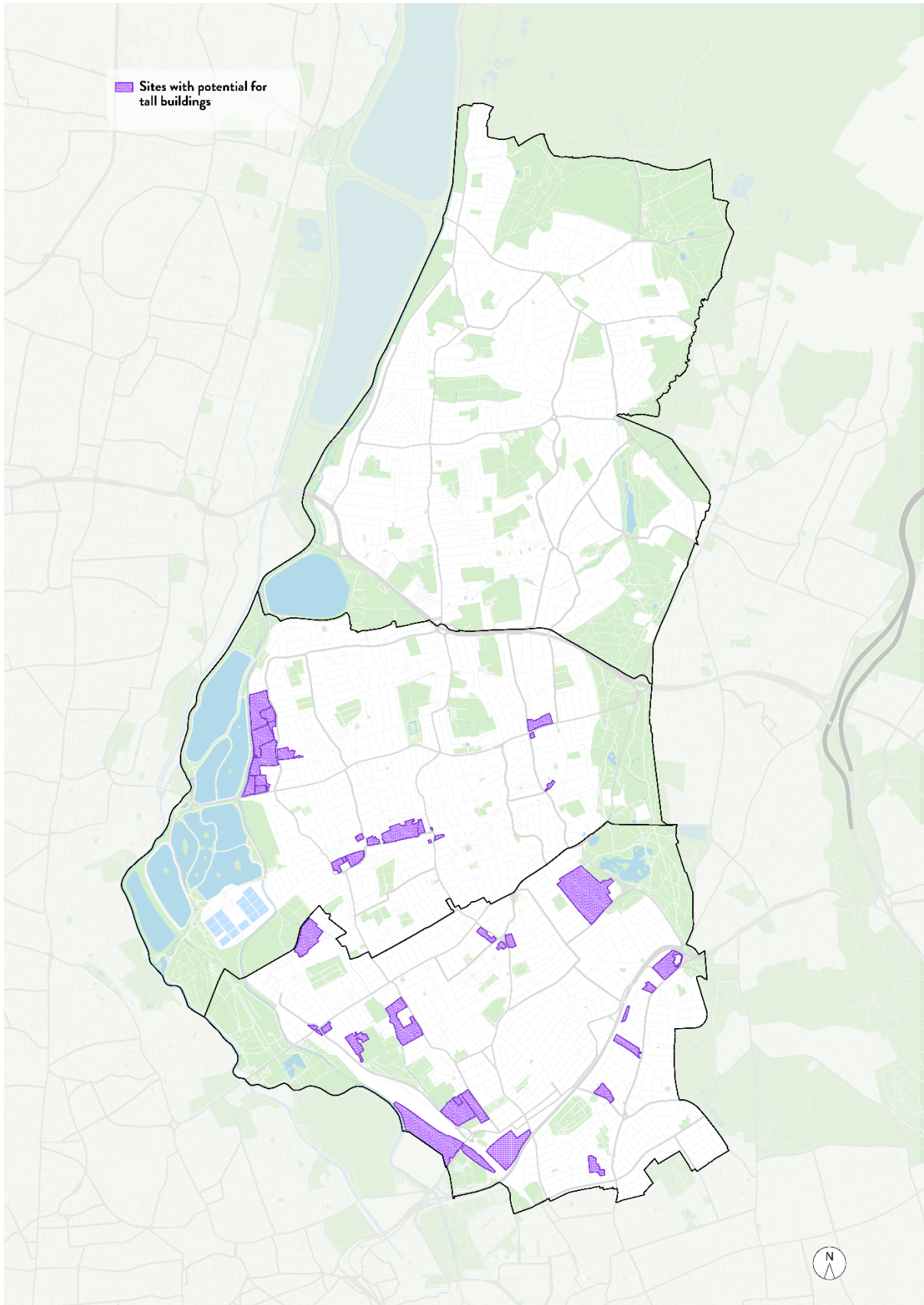


Figure 6.1: Proposed new map of sites with potential for tall buildings, to be added to the Local Plan (Figure 2 in LPE30 Topic Paper)

6.2 Is the approach to tall buildings and building heights compatible with the Plan’s spatial and growth strategy including the delivery of 27,000 new homes and Policy 8 – Character Led Intensification? Is it justified that tall buildings could be appropriate on sites in both Transformation and Transition character areas?

The approach to tall buildings and building heights is fully aligned with the Plan’s spatial and growth strategy, including the delivery of 27,000 new homes and Policy 8 “Character Led Intensification”.

The Local Plan has consistently proposed a character-led approach to intensification, including tall buildings and building heights, in accordance with London Plan Policy D1. The Local Plan recognises that, based on an understanding of character and context, some sites or areas in the borough are more appropriate for greater levels of intensification and/or height than others, and therefore sets out an approach to intensification that is derived from a reading of context and character and based on the categories of “Transformation”, “Transition” and “Reinforcement”. This character-led approach and definitions of “Transformation”, “Transition” and “Reinforcement” are set out in Policy 8, Character-led Intensification, and is supported by evidence from the Characterisation and Intensification Study (2019).

This approach has driven the Plan’s spatial and growth strategy, whereby planned growth is directed to previously developed sites in identified Strategic Locations. All sites identified as potentially suitable for tall buildings are located within Strategic Locations, all are suitable for either a transitional or transformational approach to character-led intensification and all meet the Regulation 19 Preferred Submission Version of the Local Plan locational criteria, including:

- Proximity to public transport interchanges;
- Public transport accessibility;
- Walking and cycling networks; and

- Nearby facilities such as shops, community facilities and social infrastructure.

The approach is supported by the evidence assembled in the form of the Characterisation and Intensification Study (LPE45) (also in the Evidence Base EB2.1), the Skyline Study (LPE46), evidence submitted and reviewed in support of tall buildings with planning permission, and the wealth of masterplanning work and feasibility studies undertaken to date in support of a character-led approach to intensification. This includes:

- LPE53 Blackhorse Lane SIL Masterplan Stage 1 (Baseline Report)
- LPE54 Blackhorse Lane SIL Masterplan Stage 2
- LPE48 Leyton Leisure Centre feasibility study
- LPE49 Leyton Bus Depot Feasibility Study
- LPE50 Stanley Road Car Park Feasibility Study
- LPE51 Walthamstow Town Centre Development Framework Brief
- LPE52 Leyton Mills Development Framework
- LPE55 Lea Bridge Area Framework
- LPE56 Chingford Mount Town Centre Framework
- LPE57 Leytonstone Town Centre Area Framework
- LPE58 South Leytonstone Area Framework
- LPE59 Forest Road Corridor Area Framework

The Updated Housing Trajectory (LPE31) and Updated 5 Year Housing Land Supply (LPE32) make informed assumptions about the density of sites on which tall buildings could be appropriate in line with character-led approach described above, and supported by the wealth of masterplanning work, feasibility studies and existing planning approvals.

This approach is in conformity with London Plan Policy D1, London's Form, Character and Capacity for Growth, which requires boroughs to define an area's character to understand its capacity for growth, and London Plan Policy D3, which requires boroughs to follow a design-led approach to establishing optimised site capacities. The London Plan supporting text goes

on to say that, as change is a fundamental characteristic of London, respecting character and accommodating change should not be seen as mutually exclusive (para 3.1.7).

It is also worth noting that the Lee Valley Opportunity Area runs through Waltham Forest, and the London Plan identifies associated growth opportunities at Blackhorse Lane, Lea Bridge and Leyton and “other accessible sites within and on the edges of town centres”. London Plan Policy SD1 includes requirements to ensure that Opportunity Areas fully realise their growth and regeneration potential, and in paragraph 2.1.3 encourages boroughs to take an “ambitious, imaginative and inclusive approach” to “realise their growth and development.” The character-led approach to intensification and the high bar that the Plan proposes for the design quality of tall buildings is in conformity with London Plan policy, adds an important layer of local policy and clearly establishes the local context for high quality development.

It is justified that tall buildings could be appropriate on sites identified for either Transformation or Transition, subject to meeting all other relevant policy tests. For clarity, the revised Tall Buildings policy defines tall buildings as those of 10 or more storeys, or 30m above ground level, and identifies on a map spatial locations where tall buildings could be supported. This includes appropriate sites within Strategic Locations where a “Transition” or “Transformation” approach to character-led intensification would be appropriate, in line with Policy 8 “Character-led Intensification”.

Policy 8 defines “Transition” sites or areas as those where a considerable increase in intensification could be justified resulting in some change in existing character and “Transformation” sites or areas as those with a fragmented urban grain, where a transformative approach to intensification of existing character can be justified to deliver substantially more development. The Characterisation and Intensification Study (LPE45) is clear that the level of intensification appropriate on “Transition” and

“Transformation” sites makes them suitable for tall buildings. The proposed Tall Buildings policy states that in general, the appropriate range of heights for new tall buildings in the borough is between 10 and 17 storeys. Only on some transformational sites would there be the opportunity to exceed this, subject to contextual analysis, a robust place making strategy, and all of the Tall Building policy tests being met. The proposed policy suggests that indicative ranges of potentially acceptable heights for these sites will be provided in Local Plan 2 (Site Allocations).

In conformity with supporting text for Policy D9 in the London Plan, this does not mean that all buildings up to these heights would be automatically acceptable on identified sites. For any application submitted, the specific height of a tall building above the definition proposed would vary depending on local context and character, and indeed whether the site is appropriate for Transition or Transformation. All proposals will still need to be assessed in the context of other planning policies to ensure that they are appropriate for their location and do not lead to unacceptable impacts on the local area. The appropriate height of a tall building within the stated range will be determined by careful and thorough analysis of the site’s surrounding character and context. Appropriate Policy Tests for this are set out in both the London Plan and the Local Plan, including London Plan Policies D4, Delivering Good Design, and D9 Tall Buildings and Local Plan policies on Delivering High Quality Design, Tall Buildings and Building Heights. As set out in the Local Plan Delivering High Quality Design policy, development of any height will only be supported where it would “Reinforce and/or enhance local character and distinctiveness, taking into account existing patterns of development, townscape, skyline, urban form and grain, building typologies, architecture, materials, trees and landscaping and other features of local and historical significance;” and “Respond appropriately to their context in terms of scale, height, and massing”.

This position is informed by the Characterisation and Intensification Study (LPE45) and the Skyline Study (LPE46) which tests illustrative development

scenarios on those sites in the borough that could be suitable for tall buildings. The study reviews these illustrative scenarios in the surrounding context in order to propose an appropriate level of intensification, appropriate storey height range, and indicative location for height.

To illustrate this, the planning approval at 9 Osier Way in the Leyton Strategic Location is an example of an approved scheme with tall buildings (heights up to 13 storeys) on a Transition site. This site is considered appropriate for a Transition approach to character-led intensification due to the character of the surrounding built context and proximity to allotments. Coronation Square (The Score Centre), also in the Leyton Strategic Location, is an example of an approved scheme with tall buildings (heights up to 18 storeys) on a Transformation site. The Coronation Square site is considered appropriate for transformation due to the size and location of the site offering the potential to develop a new neighbourhood, the opportunity to address fragmented urban grain and the vibrant mix of uses that can be supported, including new public realm and a health centre.

Under the Tall Buildings policy, additional high bar design criteria are established for tall buildings specifically. This includes important consideration of visual impacts on existing character and townscape, streetscape and skyline, environmental impacts like overshadowing, overheating, wind and solar glare, functional impacts including fire safety and the cumulative impacts of all these considerations.

6.3 At a strategic level, are the sites/locations identified on the map at Figure 2 of the Topic Paper (LPE30 page 52) as having potential for tall buildings appropriate and justified by the evidence? To what extent has the Skyline Study (LPE46) informed the sites/locations identified in Figure 2?

As set out in response to question 6.2, the London Plan establishes the strategic policy position that justifies the delivery of tall buildings in the right locations across the capital, including Opportunity Areas like the Lee Valley. As set out under London Plan Policy D3, Optimising Site Capacity through the Design-Led Approach, “higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling.” As set out in response to question 6.2, this – along with the Local Plan’s character-led approach to intensification, underpins the strategic identification of sites/locations identified with the potential for tall buildings.

In conformity with the London Plan, the Local Plan provides the framework for applying and implementing this strategic approach in accordance with local context and understanding, and ensures that design quality will be of the highest standard.

In this context, the sites/locations identified on the map at Figure 6.1 (and included as Figure 2 in the Topic Paper (LPE30)) as having potential for tall buildings are appropriate and justified by the evidence. The Skyline Study (LPE46) has informed the identification of sites/locations, but it is important that this is seen as one part of the overall evidence base. Taken together the whole evidence base represents a design-led approach to optimising site capacity, based on an understanding of local character, in conformity with the London Plan.

By testing illustrative development scenarios in the surrounding context through the use of a visualisation tool called VU.CITY London, the Skyline Study (LPE46) assesses the potential impact tall buildings could have on the skyline in the form of 'wireframe' (unverified) views. This gives rise to an illustrative approach to appropriate storey height range and locations for height on suitable sites. It is, however, important to note that consideration of the visual impact of a tall building on the skyline is only one part of assessing its acceptability. Other locational tests, as set out in response to questions 6.1 and 6.2, are also important in establishing potentially suitable sites, as are thorough understandings of design-led capacity.

Site specific masterplans, feasibility studies and Council-led place making strategies - such as the Leyton Mills Development Framework (LPE52) - provide this more developed evidence for the understanding of site capacity and determination of whether a tall building could be delivered in an acceptable manner. These too have underpinned the identification of suitable sites for tall buildings. Important considerations addressed in this wealth of evidence include the potential to deliver the quantum and quality of open space needed to support a tall building, access considerations, and environmental impacts.

Some of the sites identified on figure 6.1 already have planning permission for tall building(s). These permissions have only been granted following thorough analysis of submitted material, including design proposals, Environmental Impact Assessments and Townscape and Visual Impact Assessments. The sites identified as suitable for a tall building which already have planning consent are:

- Whipps Cross Hybrid Application
- Lea Bridge Station Sites (resolution to grant)
- Lea Bridge Former Gas Works
- 9 Osier Way

- Coronation Square (The Score Centre)
- Auckland Road LSIS (expired)
- Blackhorse Road Car Park
- Blackhorse Yard (Formerly Webbs Industrial Estate)
- Fulbourne Road (former Homebase site)
- Homes and Families Hub (former Wood Street Library)
- Juniper House
- South Grove Site C
- Walthamstow Mall
- Barclays Bank, 278 - 280 Hoe Street
- South Grove and Alpha Business Centre

Sites identified as suitable for a tall building where there is a submitted planning application currently under consideration are:

- Avenue Road
- Uplands (Part of Blackhorse Lane SIL Masterplan Area)

6.4 The Council has reconsidered some of the locations it considers to be suitable locations for tall buildings. Do the sites/locations identified on the map in Figure 2 (LPE30 page 52) reflect the additional locations identified as suitable for tall buildings in paragraphs 3.5.4.4 and 3.5.4.5 of the Topic Paper (LPE30)?

The Council has reconsidered some of the locations it considers to be suitable for tall buildings following a further review of consultation responses, emerging masterplan work and forthcoming planning applications. Sites no longer proposed as locations where a tall building may be supported are stated in paragraphs 3.5.4.4 and 3.5.4.5 of the Topic Paper (LPE30) and are not shown on the map in Figure 2 of the Topic Paper (LPE30). Proposed additional locations where a tall building may be supported are stated in paragraphs 3.5.4.4 and 3.5.4.5 of the Topic Paper (LPE30) and are shown on the map in Figure 2 of the Topic Paper (LPE30) and reproduced at figure 6.1 of this written statement.

6.5 How will the proposed policy approach to tall buildings and building heights be implemented alongside Policy 56 in practice?

As stated in the response to the first MIQs, Matter 6, Q132, the Regulation 19 Preferred Submission Version of the Local Plan Policy on “Delivering High Quality Design” (Policy 56), is clear that all proposals, regardless of their height, will be expected to deliver high-quality design.

The “Building Heights” policy also applies to all development in the borough and sets out indicative acceptable heights according to a site’s agreed level of intensification (“Reinforcement”, “Transition” or “Transformation”) in line with Policy 8 “Character-led Intensification” and detailed in response to questions 6.1 and 6.2 above.

The “Tall Building” policy only applies to tall buildings, i.e. those of 10 storeys or 30m above ground level, or more. The policy states that tall buildings will be subject to thorough contextual analysis and robust place making strategies and sets out additional policy tests specific to ensuring high quality tall buildings - including assessment of visual, environmental, functional and cumulative impacts - to be prepared by the applicant in support of any relevant planning application.

6.6 Overall, is the approach to tall buildings 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?

The responses above set out how the approach to tall buildings and building heights has been positively prepared and is justified, effective, consistent with national policy, and in general conformity with the London Plan.

During the first stage of Examination in Public, main modifications were proposed to the Tall Buildings policy to ensure general conformity with the London Plan. These are summarised in the LPE27 Statement of Common Ground with the GLA (LPE27).

A limited number of further modifications have been identified above in response to question 4.2. These are considered necessary to ensure the soundness of the Plan, with the relevant justification contained within the body of the Council's response. For purposes of clarity, the amended policies are set out below in whole and as they are now proposed, along with supporting text where necessary, including amendments that have previously been submitted to the Inspectors.

Policy 8 - Character-led Intensification

Opportunities for intensification of development involving housing and employment uses will be promoted at appropriate locations, justified in accordance with the following approach:

A. Reinforcement: applicable to sites/areas with robust and desirable character where opportunities for redevelopment will involve modest intensification;

B. Transition: applicable to sites/areas where a considerable increase in intensification would be justified resulting in some change to the existing character; and

C. Transformation: applicable to sites/areas with a fragmented urban grain, where a transformative approach to intensification of existing character can be justified to deliver substantially more development.

Policy 57 – Tall Buildings

For the purposes of these policy tests, the definition of a tall building in the borough is any building of 10 storeys or more, or 30m or more when measured from ground level. Tall buildings will only be supported on some sites identified for a Transition or Transformation approach to character-led intensification, in line with Policy 8 of this Plan (Character-Led Intensification). These sites have been identified on Figure XX. This remains subject to thorough contextual analysis, a robust place making strategy, and all the following policy tests.

In general, the appropriate range of heights for new tall buildings is between 10 and 17 storeys in height. On some Transformational sites however, there may be the opportunity to exceed this and, subject to contextual analysis, a robust place making strategy and all of the following policy tests, buildings of 18 storeys or more may be acceptable. Indicative ranges of potentially acceptable heights for these sites will be provided in Local Plan 2 (Site Allocations).

In some other limited circumstances, and subject to a Council led assessment of local character and context, a tall building may be considered where an opportunity for Transition or Transformation is justified and agreed by the Council on sites:

- within Strategic Locations;
- which benefit from good local public transport connectivity; and
- where a tall building fully satisfies all policy requirements, including the design considerations below (including Visual Impacts, Environmental Impacts, Functional Impacts and Cumulative Impacts).

The following design considerations will apply to Tall buildings, in addition to those set out in Policies 56 (High Quality Design) and 58 (Building Heights):

Visual Impacts

- i. Impact on the existing character and townscape of their surroundings considered in long-range, mid-range and immediate views;
- ii. Impact on the existing streetscape, including the provision of active frontages and sufficient, high quality public realm at ground level;
- iii. Impact on the existing, and where relevant emerging, skyline;
- iv. Contribution to existing and proposed spatial networks and hierarchies, wayfinding, and legibility;
- v. Impact on heritage assets, their settings, and views into and from them, including the background zones of views identified in the London View Management Framework. Heritage assets include conservation areas, listed or locally listed buildings and parks and gardens;
- vi. High quality design with careful attention paid to form and proportionality, materials, finishes, and details;

Environmental Impacts

- vii. Avoidance of harmful overshadowing or other impacts that would compromise the comfort and enjoyment of surrounding public open space, private or communal outdoor spaces, private amenity of neighbouring properties, watercourses and canals;
- viii. Avoidance of harmful environmental impacts in relation to overcrowding, overheating, wind movement, solar glare, microclimatic conditions, air, noise and light pollution and bird and bat strikes;
- ix. Use of sustainable design, materials and construction methods;

Functional Impacts

- x. Demonstration of the safety of all occupants, including considerations such as internal and external design, construction detailing, materiality, and emergency exit routes;
- xi. The impacts of servicing, maintenance, and building management on safety, quality, and enjoyment of the surrounding public realm;
- xii. Connection to public transport, walking and cycling networks and access to nearby facilities such as shops, community facilities and social infrastructure.
- i. The avoidance of interference to aviation, navigation and/or telecommunications; and

Cumulative Impacts

- ii. The cumulative visual, functional, and environmental impacts of proposed, consented and planned tall buildings in the surrounding area.

Supporting Text

In the right places, and with exemplary architectural quality, tall buildings can make a positive contribution to the character and skyline of the borough. They can help to optimise the use of land and assist in accommodating the borough's anticipated growth over the coming years, providing new homes and economic opportunities. They can help people navigate through the borough by providing reference points on the skyline and drawing attention to key destinations. They can also become beacons for regeneration and stimulate further investment.

It is important to note however, that tall buildings are not always necessary to achieve intensification and good growth. For sites or areas that are sensitive to height, lower approaches to intensification are likely to be more suitable. It is also recognised that they can present a number of challenges which must be addressed and managed sensitively in the context of their immediate and wider surroundings.

The London Plan requires local authorities to define what is considered to be a tall building, as this may vary in different parts of the capital and should take into account local character and context. This is an important consideration in Waltham Forest, where there are significant variations in existing character and townscape and in sensitivity to growth and intensification. As set out in Policy 57, new tall buildings in Waltham Forest are defined as being between 10 storeys (or above 30m when measured from ground floor) and 17 storeys. On some transformational sites, which are likely to see extensive change, there may be opportunities for buildings over 18 storeys in height. Indicative appropriate ranges of height in these instances will be set out in Local Plan 2 (Site Allocations). This does not mean that all buildings up to these heights are automatically acceptable, such proposals will still need to be assessed in the context of other planning policies to ensure that they are appropriate for their location and do not lead to unacceptable impacts on the local area.

Policy 58 – Building Heights

The existing character and context of Waltham Forest varies across the borough. Appropriate building heights will need to vary in response, in line with the approach to character-led intensification set out in Policy 8 of this

Plan. Table 14.1 below sets out a range of heights that could be acceptable. This remains subject to thorough assessments of context and character and all of the High Quality Design criteria set out in Policy 56. For Tall Buildings, additional policy tests are set out in Policy 57, Tall Buildings.

Buildings that exceed typical shoulder heights are unlikely to be supported outside Strategic Locations and Site Allocations identified in Local Plan 2 for a Transition or Transformation approach to character-led intensification. In exceptional circumstances, they may be suitable on sites identified for a Reinforcement approach.

Height and massing strategies should always come forward as positive design intentions, such as marking a location of civic, cultural, or landmark importance, rather than solely to increase density. They should contribute positively to their context and be part of a successful composition of building heights.

Agreed response to surrounding character	Indicative range of typical building shoulder heights	Indicative range of heights for buildings that exceed typical shoulder heights	Approach to Tall Buildings
Transformation	4-9 storeys	Refer to Policy 57 – Tall Buildings	
Transition	3-5 storeys	6-9 storeys	Refer to Policy 57 – Tall Buildings
Reinforcement	2-5 storeys	Not appropriate, other than in exceptional circumstances where the site context and proposed land uses would be enhanced by taller buildings. In such circumstances, 6-9 storeys may be considered appropriate.	Not appropriate

Table 14.1 Building Heights

All development proposals will be expected to address issues of height and scale with regard to the impact on the local and historic context, as set out in Historic England Advice note 4 (or equivalent) and other relevant guidance.

Supporting Text

In line with the Characterisation and Intensification Study (2019), Policy 8, Character-Led Intensification, of this Plan sets out an approach to intensification based on the categories of Reinforcement, Transition and Transformation. Table 14.1 in Policy 58 (Building Heights) sets out recommended ranges of heights for each of these categories, based on the evidence provided in that study.

The recommended ranges of height reflect the impact that such a height could have on the generally low-rise nature of some of the borough's built environment. Above that, the ranges reflect the distinction in architecture found between existing examples in the Borough.

Where not already specified in Local Plan 2 (Site Allocations), development proposals will be expected to determine which approach to intensification is most appropriate given the character and context of the site under consideration. This will be subject to agreement with the Local Planning Authority, likely at pre-application stage, and will require clear and compelling justification. Sites identified in the Site Allocations DPD will provide guidance as to whether they are appropriate for Reinforcement, Transition or Transformation.

Further site specific detail on the approach to intensification and building heights for strategic and key sites across the borough will be set out in Local Plan 2, and further guidance on location, quality and composition will be found in Supplementary Planning Documents including an updated Exemplar SPD, area specific masterplans and planning/development briefs, frameworks, guides and codes.