

## Submission 4: 1257997 Brian O'Leary

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

**Issue 1 - Whether the Plan has been positively prepared and whether it is justified, effective, consistent with national policy, and in general conformity with the London Plan in relation to creating high quality places and preserving or enhancing the Borough's heritage (Policies 56 - 61 and 72 - 78).**

*Policy 56 – Delivering High Quality Design*

**The Plan is not always justified, effective or consistent in creating high quality places and preserving or enhancing the Borough's heritage.**

**Q129** Is it sufficiently clear how criteria D should be applied in practice?

**No. LP2 Site Allocations applies it inconsistently** (see below)

**Q143** Do Policies 72-78 effectively deal with the full range of historic environment issues in a clear and consistent manner?

*Policy 72 – Designated Heritage Assets*

*Policy 73 – Listed Buildings*

*Policy 74 – Conservation Areas*

*Policy 75 – Archaeological Assets and Archaeological Priority Areas*

**No. Again there does not appear to be sufficient consistency.**

**Q144** Are Policies 72 and 73 consistent with national policy and statutory requirements associated with heritage assets? Is it justified to expect assets to be preserved and enhanced (our emphasis)?

**Yes, in my opinion. Although this does not preclude the streetscape, where applicable, including appropriately scaled and sensitive modern design.**

The ambition of the Plan to build more homes than the London Plan requires has led to **unnecessary intensification**, which is **not** always Character-led as claimed in **Policy 8**. Furthermore, there is a **lack of respect for sustainability** for some sites. The Plan is therefore **unsound** in this regard.

**An example of a lack of character-led development and respect for sustainability** is in North Chingford. Although this is not the place to fully consider specific site allocations for development, the **lack of integrated town centre planning and consultation** will lead to the loss of character to the area.

In the **Draft Skyline Study**: p12 Summary of Illustrative Scenario, for the LP2 site allocations, the Council states:

*“..Redevelopment of these sites must respond appropriately to the scale of the adjacent properties, views into and out of Epping Forest...”* This has **not** been done as up to 6 storeys is seen appropriate to one site adjacent to Epping Forest. This is then justified as:

*“...an arrival point to the borough and a gateway to Epping Forest”, claiming “...visual harm to the sensitive setting of Chingford Plain and Epping Forest, and important borough view (Pole Hill towards Buckhurst Hill) would be avoided”.*

**This lacks conformity with Historic England Advice Note 4.5.**

A similar 5 storey height redevelopment, called Chingford Hub, as a reduced civic space underneath flats, is being proposed at the other end of Station Rd. This is to replace the current Assembly Hall and Library and adjoins Chingford Green CA, with the claim:

*“By keeping the heights within the parameters recommended here, visual harm to Chingford Green CA, and the view identified in the CA Appraisal would be avoided”.*

This is contrary to the overwhelming feeling in online consultations and representations as well as being seriously **inconsistent with Policies 72, 74, 79, 81, 83 along with Historic England Advice Note 4.5.**

However the issue, for LP1, is that there has **not been the opportunity for the community to discuss their preference in terms of overall future townscape character**. Rather the feeling is that it is being imposed and consultation has been piecemeal, site by site.

It seems that the Council is more motivated, as stated in its Vision statements, to:

*“...bringing the city to the suburbs...(making) the Borough the model of new metropolitan cultural suburbs”* [LP1 3 Vision and Strategic Objectives, p10, Liveable Waltham Forest], enabling the *“...stitch(ing) the north of the borough into a vibrantly metropolitan fabric of Waltham Forest”* [Vision – North of the Borough p47 LP1].

The above I submit is **in contradiction to Policy 11 F & H**, due to the over ambitious desire to build more homes trumping a more balanced and thoughtful consideration of character.

There are other views. My own would be the desirability of **bringing the Forest into the suburbs**, with proportionally scaled and well-designed Modernism, combined with greater biodiversity using living walls and roofs, as advocated in **Policy 81 D**. With immediate proximity to the best heritage and natural habitats that Epping Forest has to offer, development could aim to complement and enhance the unique ‘village feel’ of this area along with its potential for culture and recreation, given also its concentration of restaurants and an Assembly Hall.

## Some remedies to improve soundness:

**The Council needs to be more sensitive to the need for full genuine consultation on integrated character-led town centre redevelopments.**

Accordingly amend Policies as follows:

### **Policy 7 – Encouraging Mixed Use Development**

Insert “..., ***without any presumption in favour of,***...” in:

“In contributing towards the supply of homes and jobs, mixed use development proposals will be encouraged, ***without any presumption in favour of,*** across the Borough...”

Insert after A.viii:

***“Failing the achievement of practicality and the appropriate mix, e.g. by failing to protect the amenity of existing and future residents and businesses, mixed use development will not go ahead.”***

### **Policy 8 – Character-led Intensification**

Insert: “..., ***although not overriding the maintenance of identified desirable distinctive characters,***...” and amend in:

“Transition: applicable to site/areas where a considerable increase in intensification ***could*** be justified in local areas, ***although not overriding the maintenance of identified desirable distinctive characters,*** including...”