



London Borough of Waltham Forest

TOWN HALL · WALTHAMSTOW · LONDON E17 4JF

Councillor Emma Best, Conservative Group Leader



18th September 2023

Dear....

This submission is made on behalf of the Conservative Councillors Group in Waltham Forest. We comprise of 13 councillors representing 5 of the 6 wards in the North of the Borough.

We would like to make clear that we stand by representations made at the previous stages but wish to add the following new representations based on the "schedule of Main Modifications."

MM7 and MM 26

Our view has not changed 27,000 homes is an inappropriately large number for Waltham Forest and yet now it has been changed to a minimum of 27,000.

The Council have applied flawed methodology for targeting beyond the London Plan target period, which should be drawn from the 2017 London SHLAA.

The Council remains out of conformity with the London Plan. The published London Plan sets a 10 year housing target for Waltham Forest of 12,640 new homes (1,264 per year) based on a London-wide assessment of capacity/available sites.

Waltham Forest Council Proposes a minimum of 27000 new homes over the 15 years of the Local plan. The housing requirement will be set at 1264 for 2020/21 to 2026/27, and then increase to 1594 from 2027/28- 2028/29 and again to 2494 for the plan period to 2034/35.

This means that the Council target over the 6 remaining years of the London Plan will be 8244 which is out of conformity when compared with 7584 in the London Plan.

The London Plan makes clear at 4.1.11 that if a target is needed beyond the 10 year period (2019/20 to 2028/29), boroughs should draw on the 2017 SHLAA findings (which cover the plan period to 2041). It should also roll forward the housing capacity assumptions applied in the London Plan for small sites.

The Council seems to be engaging in "sleight of hand". They are attempting to backload their targets in order to appear to be more in conformity with the London Plan but the targets for the later years will be almost double the London Plan targets.



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An 1800 target was initially proposed at an early stage of the London Plan but the Planning Inspectors examining the London Plan reduced that number as the formula used to calculate supply from small sites was not shown to be justified. The Council have not drawn on the 2017 SHLAA findings and have not produced evidence to show the planning inspectors made a mistake and therefore should roll forward the housing capacity assumptions in the London Plan for small sites.

We do not believe that what the Council proposes is in conformity with the London Plan and therefore we cannot say that these modifications are justified.

MM11 and MM12

The Council is proposing to increase the number of homes outside the identified Strategic Locations from 3800 to 5150. This is unrealistic. As we outlined above: when rejecting an 1800 per year target the Planning Inspectors examining the London Plan reduced that number because the formula used to calculate supply from small sites was not shown to be justified. Nowhere has the Council shown that the planning inspectors were wrong about the lack of small sites.

The suggested target for homes on non-strategic sites appears to be contrived to replace some of the numbers lost from identified sites. It is difficult to see how this figure has been arrived at, or how it is justified.

We also note that 'Highams Park' is now shown as a Strategic location and not as 'Highams Park District Centre'. It is therefore unclear what the Plan means when it references Highams Park. For clarity and consistency, the Plan should make clear whether references to Highams Park as a Strategic Location refer to the Highams Park Plan Area as defined in The Highams Park Neighbourhood Development Plan.

MM16

The additional wording "resulting in some change in existing character" is ill-defined as the acceptable scale of change cannot be ascertained from the word "some".

Transition sites should not materially change the character of an area so this wording should be replaced with, "but without resulting in significant change to the established character of an area".

Highams Park is designated as an area of Transition in the Plan. As outlined below, the housing targets allocated to Highams Park in MM25 are likely to cause a material change in the character of Highams Park. In our view this runs contrary to the underlying strategic objectives of the Plan.



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MM17

We welcome the dropping of Floor Area Ratio figures.

MM25

We note that the target for housing proposed for Highams Park has increased from 400 homes to 540 homes. This level of new housing will be difficult to achieve, as there has been a significant amount of development in the HP Plan Area over the past ten years and most of the remaining viable sites were taken up during this process.

The Plan fails to demonstrate convincingly how 540 homes (or more) can be built in Highams Park without a level of intensification that will significantly transform and change the character of large parts of the Highams Park area.

This would be contrary to Strategic Objective 5 in **MM5** which aims to ‘Ensure that residents are able to meet their day to day needs within a 15-minute walk, wheel or cycle of their home. Conserve and enhance the Borough’s network of culturally diverse, inclusive and sustainable neighbourhoods and celebrate their locally distinctive character and heritage,’ and Strategic Objective 10 which states ‘whilst ensuring locally distinctive character and heritage is celebrated, protected and enhanced.’

Without evidence for how the Council is going to achieve these extra homes this cannot be justified.

MM46

We are disappointed that the Council have rejected the idea of self building. This could have been a good way of involving our residents and giving some a real stake in the Borough.

MM74

The revised text shows an acceptance of the differing circumstances of residents and businesses and removes a sense of prescription about how residents might access the services and facilities they need.

It clearly now recognises that the “15 minute neighbourhood” concept might meet “daily” needs, but it should make clear that less frequent needs are still likely to require longer journeys, probably by car. The following additional wording should be added, “It is recognised that some journeys require the use of a private car and suitable parking should be provided in new developments and in town centres to accommodate those who need to make such journeys.”



MM75

We recommend that “Chingford Mount Town Centre” and “South Chingford Neighbourhood Centre” be used to define the District Centre currently described as “South Chingford” and the Neighbourhood Centre currently described as “Chingford Mount Road”. The current descriptions do not reflect locally used descriptions of these locations and as part of Chingford Mount Road is within the “South Chingford” District Centre, it would remove any potential confusion.

MM99, MM128 and MM139

It is right that the Council has recognised that the North of the Borough is poorly served by public transport, and that it is generally suburban in character. It should also be noted that many Borough residents travel out of the Borough into Essex for work and to neighbouring boroughs, something almost impossible without using a car. This difference should be reflected in policies, so such people are not excluded from living in new developments in Waltham Forest.

The North part of the Borough is only served by two mainline railway stations on one line at Chingford and Highams Park. These stations serve approximately 26,000 households. This contrasts with the Central and South parts of the Borough which are served by eight mainline railway stations on three lines and four Tube stations on two underground lines, serving approximately 80,000 households.

The North part of the Borough also has only a limited number of Controlled Parking Zones. This makes the implementation and enforcement of “car-free” development impractical and to avoid additional demand for on-street parking, which in many locations is already close to capacity, we recommend that the North of the Borough be seen as an area where parking for new homes should be provided as part of new developments.

We believe CPZ consultations should take place prior to an application being considered, and where there is not public support for a CPZ, then the development must provide an adequate level of parking for new residents.

MM139 should also be amended to reflect his and Table 1.3 amended to provide a separate provision for parking in areas with the lowest PTAL rating.

The provision in MM139 for reductions in parking provision consequent on an estate redevelopment project is not justified. It is unfair to take decant people, then allow them to return, but with poorer facilities than they had before decanting.



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MM116

As a Borough Waltham Forest has always been a low rise Borough and this is particularly true of the North of the Borough which we as councillors represent. There was no justification for 9 stories being considered a tall building in Waltham Forest so changing it to 10 is even worse.

Given the very low rise nature of the Borough, 6 storeys would in most areas easily be seen by residents as a “Tall Building”. Whilst unscientific, we ran a “ball poll” at a Community Event on Saturday the 16th of September. The result of which is clear from the attached photograph.

We cannot help but feel that in order to achieve their overblown and unjustifiable housing targets the Council will have to permit development of many more tall buildings. This would be completely out of character and unjustified for Waltham Forest and particularly for the North of the Borough which would not be protected under these modifications even though no sites in the North were shown to be appropriate for tall buildings.

MM116 – MM121

The differing character of the North, Central and South parts of the Borough are well set out in the Additional Modifications. However, the Tall Buildings policy should similarly reflect these differing characters. In the North of the Borough, there are very few buildings which exceed two storeys outside of the District Centres of North Chingford, Chingford Mount Town Centre and Highams Park. Even in those locations, heights are rarely above three storeys. There are two, 1970s built Council tower blocks of over 10 storeys and one more recently built block at the Walthamstow Stadium Development of 10 storeys. There is one six storey building in Sewardstone Road and a small number of four and five storey buildings in or adjacent to Town Centre locations. There should be a separate policy for Tall Buildings in the North of the Borough with no buildings taller than four storeys generally allowed.

MM131

Whilst reopening the “Meridian Line”, to connect the existing Chingford to Liverpool Street rail link to Stratford is a sensible aspiration, there is a risk that this will compromise the direct connection to the City of London, via Hackney. We believe this newly inserted policy should include the caveat, “provided this does not diminish the standard of the existing service between Chingford and Liverpool Street.”



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Yours sincerely,

CLlr Emma Best

