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Sent: 21 September 2023 23:50
To: localplanconsultations
Subject: Local Plan: Comment on Main Modifications

We wish to submit the following comments on the Local Plan: Main Modifications, which are set out below under the following references.

MM7 & MM26

The further reduction in housing targets to 27,000 (from 28,350) and the reductions in each of the three parts of the Borough are welcome. However, this still represents a much higher target than is required by the London Plan.

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

MM11 & MM12

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.

On Respecting Character

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”. This needs much greater clarification so that the extent of the change can be readily understood.

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”.

MM17

We welcome the dropping of Floor Area Ratio figures.

15 Minute Neighbourhoods

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 it clear that less frequent needs are still likely to require longer journeys, probably by car. For example, visits to Whipps Cross Hospital or a large supermarket, if you live in

North Chingford, The following additional wording should be added, “It is recognised that some journeys may require the use of a private car and, as such, suitable parking should be provided in new developments and in town centres to accommodate those who need to make such journeys.”

Naming of District and Neighbourhood Centres

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.

Parking in the North of the Borough

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. The Council should also note that many borough residents (especially those in the North of the Borough, living close to boundaries) travel regularly out of the Borough into Essex and Hertfordshire and to neighbouring boroughs, for leisure and services, something almost impossible without using a car. This difference should be reflected in policies, so these residents are not excluded from living in new (car-free) developments within Waltham Forest.

The North part of the Borough is only served by two mainline railway stations, both 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 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 suggest that the North of the Borough be seen as an area where parking for new homes should be provided as part of new developments.

MM139

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

Tall Buildings

MM116–121

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.

Improving Public Transport

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.”

There should be a recognition that the North of the Borough is more heavily reliant on bus services and as such it takes too long for residents to travel into central London to access main line stations for journeys by national rail.

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