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**From:** [REDACTED]  
**Sent:** 17 September 2023 16:41  
**To:** localplanconsultations  
**Subject:** Plan

I agree with the Highams Park Planning Group's response.

Delia Born

This letter contains the response of the Highams Park Planning Group ("HPPG") to the Council's consultation on the Local Plan ('the Plan') Part 1 Proposed Main Modifications. Our response has been informed by our extensive consultations with residents of Highams Park over the past nine years during preparation of the Highams Park Neighbourhood Development Plan ("the HP Plan"), which was adopted by the Council on 21st May 2020 following a 96% vote in favour in the successful referendum on 5th March 2020. In this context, given our designated role as the neighbourhood development forum for the HP Plan Area, the following comments are principally directed at the vision, strategies and attendant policies that will impact the future development and vibrancy of the Highams Park Neighbourhood Plan Area and its community.

**MM7 – Policy 2 Scale of Growth** We note the reduction in housing targets to 27,000 (from 28,350) for the whole borough, however, this still represents a higher target than required by the London Plan. It is our view that the Council have not substantiated how this target can realistically be achieved and too much reliance is placed on as yet unidentified sites for development. This substantially undermines the soundness of the Plan.

**MM11 – Location of Growth** We note that 'Highams Park' is now defined as a Strategic location and not 'Highams Park District Centre'. It is unclear what the Plan means by references to 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. With regards to the reference to other Site Opportunity Locations (Figure 4.1) in line 3 of MM11, we commented in depth on 11th December 2020 on the site opportunity locations proposed for Highams Park area as part of our response to the consultation "Shaping the Borough Waltham Forest Local Plan LP2 Draft Site Allocations Document". A copy of this letter is attached, and it remains our view that many of these sites were not rigorously assessed before inclusion in Figure 4.1 and are inviable for development; or, if developed, would result in a material change to the character of the Highams Park area. It remains our view that before inclusion in the Plan each site should be properly evaluated using the criteria laid out in our letter and measured against the potential impact on the character of the immediately surrounding area. It is likely that our comments on the sites in the Highams Park area also apply to other sites across the borough. Those sites that are unlikely to be viable for development or are likely to materially impact the character of the surrounding area should be removed from Figure 4.1. Alternatively, due to the lack of rigour, we contend that Figure 4.1 is misleading and Figure 4.1 and all references to it should be removed from the Local Plan.

**2 Ref: HP Planning Group:12/17-sep-2023** In summary, it is our view, that when establishing housing targets for a Local Plan it is not good practice to include potential sites for development that have not been properly evaluated.

**MM16 Policy 8 - Character-led Intensification** Highams Park is designated as an area of Transition in the Plan. The additional wording in MM16 "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". As outlined in our comments 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 is contrary to the underlying strategic objectives and golden threads underpinning the Plan.

**MM25 (Paragraph A) – Policy 11 North Waltham Forest** We note that whilst the overall target for the North of The Borough is reduced marginally from 3,400 homes to 3,370 homes, the quantum of 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 difficulty in meeting the housing target in the HP Plan Area is evident as 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. Based on our consultations, we believe that such swingeing changes to the character of the HP Plan Area are, both

unwelcome and unwanted, and are 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.' Transformation of the Highams Park area by overdevelopment is also contrary to Golden Thread (bullet point 5) in MM2 which states that one of the Plan's aims is 'Conserving, enhancing and celebrating the locally distinctive character and heritage of the borough'. MM25 (Paragraph G) - Policy 11 North Waltham Forest References to the Highams Park Area are ambiguous and should be clarified as per our comments on MM11 (above) to be clear whether references to Highams Park mean the area defined in and covered by the Highams Park Neighbourhood Plan. Given the detailed Character Assessments contained in the Highams Park Neighbourhood Plan for the different parts of the Highams Park Area we feel that they should be explicitly referred to in Paragraph G of the Plan and it should be amended to read as follows: 'Apply place-making principles that reflect the character and local distinctiveness of Highams Park, with particular reference to the Character Assessments contained in The Highams Park Neighbourhood Plan, the Highams Area of Special Character, and its cultural and green assets as set out in the Highams Park Neighbourhood Plan;' 3 Ref: HP Planning Group:12/17-sep-2023 MM116-121 - Policy 57 Tall Buildings 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. MM9 and MM 131 – The Meridian Line and Public Transport The Highams Park Neighbourhood Plan supports the principle of reopening of the "Meridian Line" to connect the existing Chingford to Liverpool Street rail link to Stratford but only if the existing services from Chingford via Highams Park to Liverpool Street are not reduced. The line is extremely busy and often overcrowded and we do not support a reduction of the service from Chingford to Liverpool Street. If the Meridian Line is reopened it should only be on the basis that trains do not terminate at Stratford but continue through to Liverpool Street. 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." The Highams Park Planning Group has put forward a proposal to Transport for London (TfL) that a small diversion of the W16 bus is introduced so that the bus stops at the road entrance of Whipps Cross. This change would be of great benefit to residents of Highams Park and Chingford, as it will provide a direct bus route without changes to the hospital. Implementation of this proposal would greatly reduce the need for people to drive to the hospital and is wholly in line with the Plan's aspirations to improve sustainable public transport options across the borough. We believe that this aspiration should be included in the Plan. Yours sincerely, Gordon Turpin Chair Highams Park Planning Group Attachment: HPPG response to "Shaping the