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17th September, 2023

Re: Response to Local Plan Part 1 Proposed Main Modifications Consultation

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.

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;’



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 Borough Waltham Forest Local Plan LP2 Draft Site Allocations Document, dated 11th December 2020.



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11th December, 2020

Dear Mr Murray,

Re: Second Response to “Shaping the Borough Waltham Forest Local Plan LP2 Draft Site Allocations Document”

This letter contains additional comments from the Highams Park Planning Group (HPPG) to those included in our letter of 3rd November 2020 with regards to the Council’s consultation on the draft Local Plan “Shaping the Borough Waltham Forest Local Plan LP2 Draft Site Allocations Document”. This response has been prepared by HPPG in its capacity as the designated neighbourhood development forum for the Highams Park Plan Area.

This additional response has been **prompted by our review of the Submission Version of the Local Plan (SLP)** which commenced after the LP2 Site Allocations Consultation.

In particular, we should like to make the following points:

1. We note that a number of Site Opportunity Locations were included in your LP1 (Regulation 19) consultation but were not included in this LP2 Site Allocation Consultation, as they are not regarded as Key or Strategic Sites. We believe this is potentially misleading due to the impact development of these sites could have on the character of Highams Park and other areas across the Borough and these sites **should not** have been included in the Submission Version of the Local Plan consultation without proper consultation **even as Site Opportunity Locations**.
2. Due to the heavy reliance on Site Opportunity Locations in the SLP to meet the Council's housing targets, a more rigorous and thorough consultation as part of the LP2 Site Allocations Consultation, should have been undertaken regarding these Site Opportunity Locations in Highams Park and across the Borough before their inclusion in Figure 4.1. in the SLP.

Our reasons for the above statements and why we believe this lack of consultation affects the soundness of the SLP are articulated below.

The SLP allocates a new housing target of 3,400 new homes in the north of the borough, of which 2,000 homes are targeted in 5 strategic locations and 1,400 homes are targeted outside of the strategic locations. That part of Highams Park designated as a “strategic location” has been allocated a target of **400 new homes**.

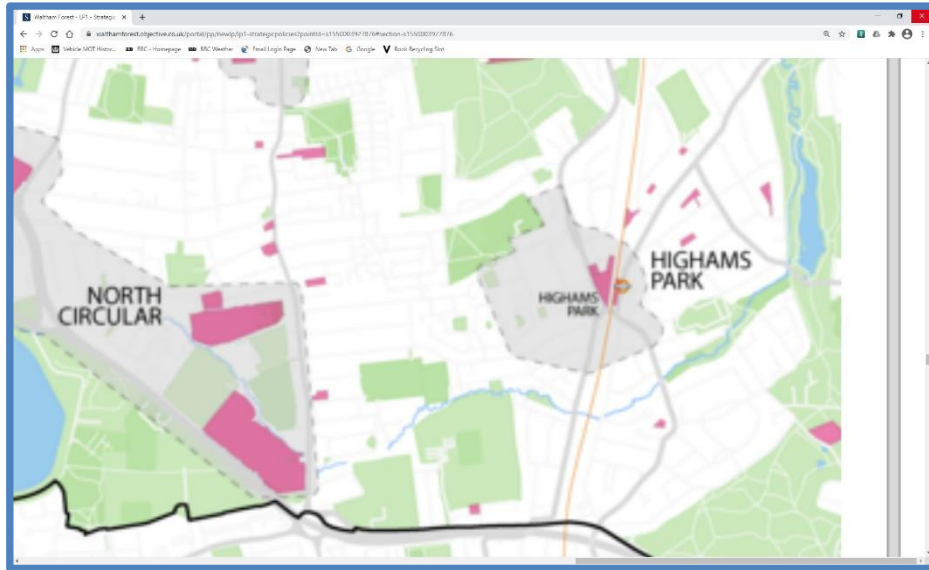


Fig 4.1

Only 59% of new housing in the north of the borough is allocated to Strategic Locations. The distribution of the other 41% of the target of 1,340 new homes at Site Opportunity locations across the north of the borough is unquantified.

Based on the maps provided, it is apparent that Figure 4.1 contains thirteen potential Site Opportunity Locations in the HP Plan Area. Figure 4.1 is a small scale, low resolution graphic from which it was impossible to discern all the sites marked on the map in the HP Plan Area from the documents provided; nor was there a list of addresses of the Site Opportunity Locations. We contacted Council planning officers who kindly provided us with maps of each site. We have listed these sites below and, for clarity, have split them between sites within the HP Strategic Location and those sites that fall within the HP Plan Area but outside of the HP Strategic Location.

Only three of these sites are situated within the HP Strategic Location, being:

1. **472-510 Larkshall Road**; being the buildings from the Shell Garage up to the railway crossing. This site is included in the Council's LP2 Site Allocations consultation as site SA62 and provides for 145 new homes.
2. **The Shell Garage at 470 Larkshall Road**; This site is included in the Council's LP2 Site Allocations consultation as site SA63 and provides for 10 new homes.
3. **BLR_151 - Highams Park Station and Car Park**; this site is not included in the LP2 Site Allocations consultation and no targets for housing have been suggested in the SLP.

Sites 1. & 2. are included in the Site Allocations LP2 Consultation but only account for 155 of the proposed new homes in Highams Park; this means the balance of 245 homes will have to be built on the sites shown in Fig 4.1 and through other windfall sites that may become available for development.

There are 10 other Site Opportunity Locations for new housing shown in Figure 4.1 which fall within the HP Plan Area but are outside of the HP Strategic Location. These sites are:

4. **BLR_110 - 163 Centre Way**; Roberts Hall off Wadham Road to the rear of The Wadham Café and backing on to the grounds of the Peter May Centre. The site is currently occupied by a children's day nursery.



5. **BLR_141 – Garages off Hale End Road;** the garages and garden to the rear of Swallow Court backing on to the gardens of 29-34 Beech Hall Crescent, 393-397 Hale End Road and 1-9 Forster Close.
6. **BLR_142 - County Hotel (SSA57);** in Oak Hill (now known as the Epping Forest Hotel)
7. **BLR_143 – Garages off The Avenue;** backing on to the gardens of 121 to 129 The Avenue & 48 Richmond Crescent
8. **BLR_144 - 25. Wrigley Close (Adjacent to 85 The Avenue);** garages backing on to the gardens of 8-14 Richmond Avenue, 2 Richmond Crescent, 75 & 85 The Avenue.
9. **BLR_147 – Garages between Castle Avenue and Handsworth Avenue.** This is comprised of two parcels of land:
 - a. Garages to the rear of Briarview Court, Handsworth Avenue backing on to the gardens of 67 to 87 Handsworth Avenue and 22 to 28 Castle Avenue.
 - b. Garages to the rear of Hedgemoor Court and Hewitt House, Castle Avenue backing on to the gardens of 67 to 87 Handsworth Avenue and 22 to 28 Castle Avenue.
10. **BLR R_148 - Garages off Richmond Avenue;** behind 3 and 5 Richmond Avenue, Marien Court and 49 to 57 The Avenue, backing on to the railway line.
11. **BLR_150 - Garages off Castle Avenue;** to the rear of the flats in Wentworth House, Bailey Court and 39 Castle Avenue. Backing on to the gardens of 35 Castle Avenue, 2-8 Falmouth Avenue and 106 to 104 The Avenue.
12. **BLR_152 - Garages to rear of Clivedon Rd;** backing on to the gardens of 1 to 27 Clivedon Road, 84 to 116 Forest Glade and 8 to 24 Sheredan Road.
13. **BLR_156 - Larkshall Timber Yard;** 192 Larkshall Road. Currently in use as a garage repair and car wash and backs on to 194 and 196 Larkshall Road, St Anne’s Church and the railway line.

The absence of these Site Opportunity Locations from the LP2 consultation was justified in the SLP by stating that only strategic or key sites would be included in the site allocations consultation. We believe this is misleading as there are only two key/strategic sites and these two sites account for only around 38% of the housing target in the HP Plan Area (and possibly less). A map of the Site Opportunity Locations should have been included in the LP2 site allocations document, along with the addresses of those sites. This would have provided transparency to local residents, as it would have been clearer by what means the housing targets may possibly be met and allowed people to assess the likely impact of new development in their neighbourhood.

Representatives of the Highams Park Planning Group (along with other community groups in the north of the borough) were invited to a “Site Allocations Workshop” on 28th January, 2020. At this workshop we were shown headline maps of the sites shown in Figure 4.1. The workshop was fairly informal but the consensus of attendees at the workshop was that, with the exception of sites 4, 6 and 13, the sites suggested in the HP Plan Area are unsuitable for development. It is disappointing that the Council chose not to listen to the comments made at the workshop and has included all these sites in Figure 4.1 of the SLP without any public consultation on sites 3 to 13 listed above. Their inclusion in the SLP consultation in the narrative for Policy 4 – Location of Growth is vague and contradictory; and, as mentioned previously, the sites shown in Figure 4.1 are too indistinct to identify clearly.

It is unclear in the SLP how references to the Brownfield Land Register relate to the sites included in Figure 4.1. We consider it to be very important that more clarity is provided, as inclusion of sites in Part 2 of the Brownfield Land Register essentially grants “permission in principle” for residential development on those sites. Accordingly, the SLP should be clear as to whether:

- it is the Council’s intention, over time, to include all or just some of these sites in the Brownfield Land Register;



- the Council has undertaken a preliminary study to ascertain which sites meet the criteria for inclusion in the Brownfield Land Register;
- it is feasible to develop these sites.

This lack of clarity is exacerbated by the fact that:

- as far as we are aware, there is no evidence base accompanying the consultation documents that provides a basic assessment of the likely availability or feasibility of these sites; and
- the Council's Brownfield Land Register appears to be out of date as it is dated 31st December, 2018 and only includes 3 sites in the HP Plan Area, two of which are not included in Figure 4.1 as they already have planning permission (the Regal Cinema and Naseberry Court). The third site is 480 to 510 Larkshall Road which forms part of Site SA62 mentioned above.

Note: With reference to the second bullet point above, The Town and Country Planning (Brownfield Land Register) Regulations 2017 requires local authorities to notify and consult with relevant Neighbourhood Development Forums before proposing to add any sites to Part 2 of the Brownfield Land Register. Accordingly, the Council is obliged to notify and consult with the Highams Park Planning Group should it propose to include any sites within the HP Plan Area in Part 2 of its Brownfield Land Register.

Before sites are included as Site Opportunity Locations in Fig 4.1 of the SLP (whether or not they are to be included in the Brownfield Land Register), the feasibility of each site should be measured, as a minimum, against the following criteria stipulated by the Town and Country Planning (Brownfield Land Register) Regulations 2017 in relation to each parcel of land that:

- a) the land has an area of at least 0.25 hectares or is capable of supporting at least 5 dwellings;
- b) the land is suitable for residential development;
- c) the land is available for residential development (i.e. the owners wish to develop it);
- d) residential development of the land is achievable;
- e) whether development of any of the sites will cause any adverse impact on the local amenity which such development might cause for intended occupiers of the development or for occupiers of neighbouring properties; and
- f) Headline development parameters should also be set for any Site Opportunity Locations which truly reflect the character of the area in which they are located. Height, density and massing should be set by reference to the light suburban character of the HP Plan Area. Development should provide gardens and amenity space in keeping with the vicinity of the development.

The assessment of each site designated as a Site Opportunity Location should be included in the evidence base for the SLP.

In the absence of an evidence base in the existing draft SLP, there is little data provided for assessment of the sites in Figure 4.1 but our own empirical assessment, based on our knowledge of the HP Plan Area, suggests that most of the sites are not suitable for inclusion as Site Opportunity Locations in the SLP, as they are subject to multiple ownerships which means they are unlikely to become available for development; and/or are likely to have deleterious impact on the environment and character of the surrounding area. A summary of our findings is provided below:

- **Sites 5,6, 8, 9, 10 & 11** are the garage and storage facilities, and, in some instances, gardens to the rear of blocks of flats. The Council does not own the land, as the flats are in most part privately owned and the owners of the flats have rights over the garages. What is being proposed is new housing being squeezed in behind the existing blocks of flats and the back gardens of neighbouring properties. All of these sites are quite small, so building on the garage sites will be substantially detrimental to the existing residents amenity through light and noise pollution, reduced privacy and right to light; the same adverse effects will

also apply to the neighbouring houses. There is also little room on most of these sites to provide adequate amenity space to provide a healthy living environment for incoming occupants. Given the multiple ownerships of the sites and the degradation in the living environment of the owners, it is unlikely that all the owners will agree to sell their garages and gardens for development, this makes it unlikely that these sites will ever become available for development.

- The garages in **Site 12** are also in multiple ownership. Some serve to provide garaging to residents of the houses in the nearby streets and there is a small block of garages in the centre of the site that are available for hire. Around the perimeter of the site garaging is provided at the end of the gardens for houses in Forest Glade and Sheredan Road; the owners of these garages have access rights to the site. The need to allow access to these garages and the multiple ownership of the sites and access rights makes it unlikely that this site is feasible or will ever become available for development.
- **Site 7** is a very small site and has similar constraints to those mentioned above and will have a particular adverse effect on the environment of the neighbouring properties.

In view of the foregoing, we believe it is misleading to include **Sites 5, 6, 7, 8, 9, 10, 11 and 12** in the SLP, as they are not likely to become available or cannot be feasibly developed. It is also important to note that **none of these sites are street facing** and have limited access to the surrounding streets, which means these sites would essentially be back garden developments! Accordingly, we believe these sites should be removed from Figure 4.1 of the SLP.

We note that **Highams Park Station and Car Park (Site 3)** is included in the list of Site Opportunity Locations. This is wholly unacceptable. Our consultations over the past seven years have demonstrated that Highams Park Station is core to the character and feel of Highams Park and much valued by local people. The importance of Highams Park Station is reflected in Character Assessment 9 of the HP Plan which defines the station building as the main feature and focal point of the town centre, as per the following extracts:

“LAYOUT AND STREET FEATURES

The main feature of the area is the railway station, with the re-purposed signal box (build 1925), together with the active feature provided by the level crossing (fig 1). The retail lined roads radiating out from the rail crossing create a “marketplace” feel to the area (fig 2). The Millennium Clock and new landscape features in Signal Walk reinforce the area’s role as the “town centre”.

The modest scale of buildings allows a constant backdrop of mature trees as a key character aspect of the area, complemented by well-established street trees viewed along the radiating streets. The Larkshall Road frontage also has a wide grassed area with mature trees providing a buffer between the industrial buildings of the industrial estate and homes to the east.”

“LANDMARKS AND NOTABLE BUILDINGS

The station is the focal point around which Highams Park has developed with its building (fig 3) dating from 1903 to a design by architect Neville Ashbee in the ‘Domestic’ style characteristic of the Great Eastern Railway at that time. It is a modest and well-proportioned building suffering because of its car dominated immediate surroundings, but then supported in scale by lively small-scale shop units on either side of the station frontage. The Signal Box (fig 1) is a prominent feature of the Highams Park centre which dates from 1925 and is now operating as a specialist café.”

Because of the importance of Highams Park Station to local people and to the character of the area, we wrote to the Council on 6th October, 2018 and requested that Highams Park Station be added to the Council’s list of locally significant buildings; we also suggested other buildings that local residents consider significant in the area for inclusion in the list and that the station be included as part of a small conservation area to conserve Highams Park’s characterful townscape. We were advised that these suggestions would be considered but to date, despite



numerous follow up requests, we have not had a response to these recommendations. We also included these requests in our response to the Shaping the Borough Local Plan Consultation in 2019.

The value local people place upon the Highams Park Station building and its importance to the character of the area was demonstrated again recently in the many objections submitted in respect of planning application ID 203040. This application proposed a seven-storey block of flats immediately behind the station at 480 to 510 Larkshall Road. People objected strongly to this as they do not want to see the character of the town centre changed significantly through the station building being dominated by a seven-story block of flats.

The station car park is already used for community events and markets and could be repurposed as a public square/open space if it is no longer required as a car park; as per the recommendations **of Annex 1 - Aspirations, Projects & Actions of the HP Plan**, this recommendation also includes a sketch of how the space may look.

To demolish and build on Highams Park Station and car park would be against the wishes of local people and wholly contrary to Bullet point 10 of the strategic objectives in the SLP which states

- “Ensure Waltham Forest’s network of cultural, inclusive and sustainable neighbourhoods are safe and diverse, celebrating their locally distinctive character and heritage.”

In view of the importance of the Highams Park Station building to the character of the area, **Site 3** should be removed from the Site Opportunity Locations in Figure 4.1 **and added to the Council’s list of locally significant buildings.**

In paragraph 7.5 of the SLP the Council states **“The North of the borough has great opportunities for housing, employment and cultural growth.....”**

We cannot speak for other areas in the north of the borough but based on our review of the Council’s proposed site allocations and suggested Site Opportunity Locations in the HP Plan Area, we do not think this statement applies to Highams Park with regards to housing. If this statement were correct the Council would not feel the need **to shoe-horn inappropriate “back-garden developments” into low density residential areas in order to meet its housing targets in the area**, without due consideration of the deleterious impact on the character, environment and living conditions of the areas around those sites.

We believe that the Council should lower its housing targets for the HP Plan Area and reconsider what sites are likely to be viable for the delivery of new housing in the area.

At the workshop on 28th January 2020 we rejected Site Opportunity Locations site 2, 5, 7, 8, 9, 10, 11 & 12 as inappropriate locations for housing development and, at the same time, we reminded Council officers of a number of sites we put forward in our response to the Council’s Direction of Travel Consultation Document in December 2017 that, if redeveloped, we believe will help regenerate the Highams Park District Centre, as well as providing additional housing. These include the list of Potential Sites for Development in the HP Plan Area included in our response to the LP2 Site Allocations consultation. One suggestion on the list is the remodelling of the Aldriche Way housing estate to improve the layout, so as to provide substantially more housing and address social issues on the estate. We also suggested some repurposing of underused land in area BEA 1 for housing (see below for comments on area BEA 1).

The SLP makes a number of statements regarding preserving the distinctive character of the different areas of the Borough and in paragraph 7.1 below articulates this very precisely and states that:

- *“7.1 This chapter sets out the spatial approach for North Waltham Forest, which principally covers Chingford, Chingford Mount and Highams Park. In this Plan, the borough is divided into three areas: South Waltham Forest, Central Waltham Forest and North Waltham Forest. The divergent character of each area presents different challenges and opportunities **requiring a more locally distinctive policy response**. The policies in this section should be read in conjunction with other policies in the Local Plan, Highams Park Neighbourhood Plan and North Chingford Conservation Area Appraisal.”*

And, paragraph 2.2 of the SLP **“Neighbourhoods and Communities”** states

- *Central areas of the borough have a dense urban character and busy street life, the borough becomes more suburban to the north with lower density housing and more open green spaces that flow into the Green Belt, Epping Forest and out to Essex*

From our review of the SLP with regards to Location and Management of Growth in the HP Plan Area, the proposed intensification methodology for achieving the housing targets shows no real consideration of the above statements. In fact, given the generally light suburban nature of the HP Plan Area outside of the district centre, what is proposed in the SLP does exactly the opposite. We should like to re-iterate that this level of development is wholly inconsistent with Bullet point 10 of the strategic objectives in the SLP *“Ensure Waltham Forest’s network of cultural, inclusive and sustainable neighbourhoods are safe and diverse, celebrating their locally distinctive character and heritage.”*

Paragraph 7.4 of the SLP states

- *7.4 The regeneration potential of the area is recognised in the London Plan. The Upper Lee Valley is designated as an Opportunity Area at sub-regional level **and Highams Park is designated as a Strategic Area for Regeneration.....”***

We do not agree with the statement in the London Plan that the HP Plan Area is in need of regeneration, as Highams Park is a vibrant area, with a strong community ethos and even during the COVID hiatus new shops and businesses have opened across the area. Irrespective of whether we agree that the area is in need of regeneration, the SLP makes no attempt to explain what part of the HP Plan Area needs regeneration. It may be that the SLP is suggesting that regeneration may be achieved by intensifying development through building tower blocks around the station area and in the back-garden areas of quiet residential streets. If this is the case, we do not agree with this approach, as we believe it will depersonalise what is currently a vibrant and friendly community.

If regeneration is required, we believe it is more likely to be achieved by looking at other sites across the district centre and following the development parameters for those sites included in the Potential Sites for Development document we submitted to the Council as part of the LP2 Site Allocations Consultation.

In summary, given that we are the Neighbourhood Development Forum for the HP Plan Area, we are disappointed that the Council has paid little heed to the suggestions made by us for removal of some inappropriate sites or for the inclusion of other sites suggested by us at the workshop. Other than at the workshop in January 2020, the Council did not consult with us on the proposed Site Opportunity Locations before including them in Fig 4.1.

Appendix 2 of the SLP – Employment Land Character & Vision – BEA 1

We disagree with the comment in Appendix 2 of the SLP that there is limited potential for intensification in area BEA 1. Parts of the area are significantly underutilised and could be put to better use as they provide very little employment; in particular, the plots occupied in Hickman Avenue by Hanar Cars (second hand car sales) and Elite Truck Training (HGV instruction).

If the Council is struggling to meet its housing targets in the HP Plan Area, we suggest that these two plots are withdrawn from area BEA 1 and allocated for housing. Both sites back on to the Rolls Park Playing Fields, so



incoming residents would benefit from abundant green space and close proximity to the Highams Park District Centre. There are no immediately neighbouring buildings other than the Shurgard Self Storage Facility, so this area could be more intensively developed than other parts of the HP Plan Area without impacting the character of the area, or adversely affecting the amenity of other residents in Highams Park.

There is precedent for conversion to housing in area BEA 1; being Endeavour House which provided 82 new homes by using land in area BEA1 originally intended for a use as a polyclinic.

There are also other parts of area BEA 1 which are significantly underutilised (including the Shurgard site) and which have potential for providing more local employment through **redevelopment** and mixed use. We suggest that the Council undertakes a thorough review of the uses throughout area BEA 1.

We consider the Council has failed to engage with us sufficiently regarding that part of the SPL that relates to the HP Plan Area and site allocations, such as: the proposed additions to the locally listed buildings and site opportunity locations.

For the record, we responded with detailed comments to the Shaping the Borough Consultation in 2019. These comments were intended to apply to specific policy statements **relating to the development in the Highams Park Plan Area**. We copied this letter to our members and many of them also responded to the consultation expressing support of our comments. In the Council's Consultation report dated July 2020, officers made only a cursory response to our comments and those of hundreds of local people, as follows:

"The draft Local Plan has a borough-wide strategic focus to be supported by supplementary planning documents and masterplans for identified local areas. The Council recognises the supporting role of neighbourhood plans such as that being prepared by the Highams Park Planning Group. However, in accordance with national planning policy, a neighbourhood plan must be in conformity with the Local Plan, delivering the strategic aspirations of the Local Plan set at higher level. The Council has declared its commitment to work with the Highams Park Planning Group to ensure a good relationship between both plans."

Whilst we accept that the HP Plan is subordinate to the Council's Local Plan, we were not suggesting that policies in the HP Plan should drive policies Borough wide. As the draft Local Plan contains recommendations and policies that relate specifically to Highams Park, we were making comments on how those parts of the Local Plan that relate to the HP Plan Area could better reflect the aspirations of local people. These comments were made based on our knowledge of the area through our extensive consultations over the previous 5 years (at that time). Given the foregoing, we do not consider the Council's response in the Consultation report to have been adequate or appropriate.

We appreciate that this is a long letter, so have summarised some of the key points below.

Summary of Key Points:

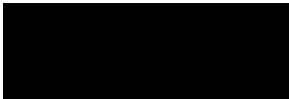
- The Site Allocation consultation documents are lacking in clear detail to the point of being misleading as to where development is likely to take place in the HP Plan Area.
- Swingeing changes to the character of the HP Plan Area are both unwelcome and unwanted and do not accord with the SLP's stated objective to "Ensure Waltham Forest's network of cultural, inclusive and sustainable neighbourhoods are safe and diverse, celebrating their locally distinctive character and heritage".
- The target of 400 homes (and most likely more) is an unsustainable target, as the HP Plan Area has already been subject to significant development over the past ten years and most of the remaining viable sites have been taken up.



- The site suggestions submitted by us in the first round of consultation in 2019 and in this LP2 Site Allocations should be considered as alternative locations to meet housing growth in the HP Plan Area.
- The criteria used to select the Opportunity Site Locations (Figure 4.1) in the HP Plan Area are not provided. It is our assessment that most of the sites in Fig 4.1 are not suitable for inclusion as Site Opportunity Locations in the SLP.
- **Sites 5, 6, 7, 8, 9, 10, 11 and 12 should not be included in the SLP**, as they are not likely to become available or cannot be feasibly developed. It is also important to note that **none of these sites are street facing** and have limited access to the surrounding streets which means these sites would **essentially be back garden developments!** We do not believe that such sites will provide the appropriate amenity space or the high-quality homes and environment that the Council aspires to for incoming and existing residents in the SLP.
- **In view of the importance of the Highams Park Station building to the character of Highams Park District Centre, Site 3 should also be removed** from the Site Opportunity Locations in Figure 4.1 and **added to the Council's list of locally significant buildings** (and our other suggestions also considered).
- We suggest that the Council undertakes a thorough review of the uses throughout area BEA 1 and that some plots are **taken out and allocated to housing**.
- Some parts of **area BEA 1 could be better utilised for employment purposes**.
- Given that we are the Neighbourhood Development Forum for the HP Plan Area, we are very disappointed with the almost total lack of engagement that the Council has undertaken with us for those parts of the SLP and in particular the Site Opportunity Locations that relate to the HP Plan Area.

We appreciate the need for the Council to press ahead with the new Local Plan but we respectfully suggest that the consultation should have been deferred given the limited ability to engage and meet properly with residents and businesses due to the COVID 19 pandemic. This would have allowed more in depth discussions with local people across the borough and a better informed outcome in the SLP.

Yours sincerely,



Gordon Turpin
Chair
Highams Park Planning Group