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**Sent:** 13 September 2023 21:05  
**To:** localplanconsultations  
**Subject:** London Borough of Waltham Forest Local Plan LP1 "Shaping the Borough"

## Comments on your proposals

MM16 29 8 Policy 8 - Character-led Intensification Opportunities for intensification of development involving housing and employment uses will be promoted at appropriate locations justified in accordance with the following approach: A. Reinforcement: applicable to sites/areas with robust and desirable character where opportunities for redevelopment will involve a modest increase in intensification; B. Transition: applicable to sites/areas where a considerable increase in intensification would be justified in local areas including Designated Centres, Major Routes, Borough Arrival Points and Strategic Locations **resulting in some change in existing character**; and C. Transformation: applicable to sites/areas with a fragmented urban grain, where a transformative approach to intensification of and change to existing character can be justified to deliver substantially more development

**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".**

MM74 98 Strategic Objective Strategic Objective Revive (Post Covid-19) and support Waltham Forest's network of thriving, safe and attractive town centres, maintaining the distinctive role of each and making them accessible to all, helping making sure that residents are able to **meet their daily shopping, work, recreational and cultural needs within a 20 15-minute walk, wheel or cycle from home.**

### **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."**

## District and Neighbourhood Centres

MM75 99 39 Policy 39 - Hierarchy of Centres The borough's network of centres, as identified below, will be protected and enhanced in order to provide a sustainable distribution of town centre facilities and services to support local communities and deliver 15 Minute Neighbourhoods. The borough's designated town centre hierarchy is as follows:..... B. District Centres – North Chingford, South Chingford, Highams Park..... District Centres will be the primary focus for development and investment in shops, services, leisure and complementary community uses..... C. Neighbourhood Centres – Sewardstone Road, Chingford Hatch Lane, Chingford Mount Road,..... These centres will be the focus for smaller scale retail and town centre services and facilities appropriate to their role and function, which is to serve the everyday needs of local communities

A little confusing

## Parking and public Transport in the North of the Borough

MM99 122 New paragraph In situations where an area of need may be constrained by **poor access to public transport**, walking and cycling, the Council's transport policies (Policy 63 'Active Travel' and Policy 64 'Public Transport') will apply – requiring measures to **ensure connectivity and integration of the public transport network with other transport modes** including walking and cycling **within and outside the borough** aligned with the 15-Minute Neighbourhood principles.

MM128 144 62 Policy 62 - Promoting Sustainable Transport New All new development will be supported where it contributes expected to contribute to the Council's objective to deliver **more attractive, accessible, healthy and safe streets, places and neighbourhoods for all residents in Waltham Forest**. Planning permission will be granted for new development that: As such, development proposals will be supported where they: A. Create an environment where residents and visitors actively feel welcomed and **choose to walk, cycle or use public transport** as part of their everyday life; B. Contribute towards enhancing streets to meet 'Healthy Streets' indicators across the public realm in the borough; C. **Increase the number proportion of trips** made by walking, cycling and **public transport** and cycling, and improve local connections and facilities for these modes, in line with Policy 63 'Active Travel' and Policy 64 'Public Transport'; D. Improve the quality and resilience of the public realm, ensuring **accessible and adaptable public space for people and activities from all walks of life**; E. Create safe neighbourhood environments, including reducing road danger, improving personal security and meeting the Mayor of London's Transport Strategy objective for 'Vision Zero'; F. Provide legible, prominent and coherent wayfinding for walking and cycling to and through strategic and local active **travel networks, public transport hubs, amenities, schools and green spaces**; G. Support permeability for active modes of travel, and prioritise road space for cycling, walking and **public transport**; H. Ensure neighbourhoods have **good connections to public transport**, in line with Policy 64 'Public Transport'; I. Deliver car-free development to reduce car dominance in terms of congestion and excessive parking on the street; I. Support car club development, cycle hires facilities and other sustainable transport initiatives, such as electric vehicle, charging infrastructure and pocket parks, J. Support sustainable transport initiatives that reduce demand for car ownership such as: car club development; cycle hire facilities; **local bus service improvements**; electric vehicle charging infrastructure; and pocket parks, in line with Policy 68 - Managing Vehicle Traffic and Policy 69 - Electric Vehicles (EV); and K. Reduce car dominance in terms of congestion and excessive parking on the street; Improve air quality and reduce noise pollution by promoting sustainable transport initiatives; and reducing Nitrogen Oxide (NOx) emissions and exposure of vulnerable people to air pollution, in line with Policy 90 'Air Pollution and Policy 65 'Development and Transport Impacts'. supporting paragraph 18.9 (Policy 90 - Air Pollution).

MM139 156- 158 68 Policy 68 - Managing Vehicle Traffic In order to encourage and promote active and sustainable transport as the main means of travel in Waltham Forest, to improve air quality, improve personal health and well-being and respond to the Climate Emergency, **all new residential developments** (major and minor) in the borough **should be car-free**. Where car parking is required, the following considerations will apply: A. In the case of proposed developments in less well-connected areas, a robust Transport Assessment must be provided to justify the need for any deviation from car-free development, in line with London Plan policies and paragraph 15.30; B. Proposals must not exceed the maximum parking standards set out in the London Plan and the Parking Standards included in Appendix 1 'Parking Standards' of this Plan. For mixed use schemes, specific parking should be provided for different uses;. C. Disability Discrimination Act compliant (DDA) (Blue Badge) Parking spaces should be provided for all developments, including car-free proposals in accordance with best practice standards, as set out in the London Plan and the Council parking standards Appendix 1 of this Plan; D. **Parking or loading provision for essential operational or servicing needs must be justified through a Transport Assessment**, in line with Policy 65 'Development and Transport Impacts'; E. Where other car parking (including motorcycle parking) is exceptionally provided it must not exceed the London Plan and the Council's parking standards set out in Appendix 1 of this Plan; F. **New development must incorporate designated spaces for deliveries within the boundaries of the development and provide Delivery and Servicing Plans which encourage provision for low-emission, consolidation and last mile delivery modes**; in line with Policy 65 66 'Deliveries Freight and Servicing'; G. Car Parking in new developments for GPs, health and educational facilities will be supported by following the Council's parking standards set out in Appendix 1 of this Plan and London Plan policies; H. Operational parking for business and industry uses will be permitted when need is clearly demonstrated within the Transport Assessment, and measures have been applied to minimise the number of

vehicles, frequency and impact of trips. All operational vehicles should be electric or meet the Euro Emissions Standards outlined by the Ultra Low Emission Zone (ULEZ) and operational parking should include infrastructure to support Electric Vehicle Charging; Parking Management I. J. Where parking is provided as part of a development, proposals must be supported with a Car Parking Management Plan detailing the mechanism for leasing spaces, the provision of disabled parking to meet future demand, and activation of passive electric charge points, in accordance with the London Plan guidance on Parking Design and Management; J. K. Proposals must ensure that disabled parking spaces in residential developments are only used by Blue Badge holders who are occupiers of wheelchair accessible units homes in the development. Disabled spaces must not be sold off or leased to other residents; K. L. A car-free agreement within legal agreements will be required, restricting new residents from accessing parking permits within existing Controlled Parking Zones (CPZs) or ensuring future CPZs are in place before a development is occupied; L. M. Where roads in close proximity to the site are not managed, or not adequately managed by parking controls, appropriate financial contributions will be sought to secure the delivery of CPZs; Estate Regeneration M. N. Where car parking is re-provided as part of Council housing estate regeneration schemes, car parking should proposals must be supported with a Car Parking Management Plan. The plan must outline how car parking will be reduced to meet the minimum need of returning residents, detail the mechanism for leasing spaces, the provision of Blue Badge parking to meet future demand, and specify activation of passive electric charge points, in accordance with the London Plan guidance on Parking Design and Management. Where car parking exceeds Council parking standards, evidence of parking need should be provided N. O. Re-provided car parking spaces for existing residents should at no point be offered to new residents. Therefore the Car Parking Management Plan should set out how spaces will be repurposed in the future such as for pocket parks, play spaces and additional cycle parking. O. Car parking provision should be flexible for different users and adaptable for future repurposing to benefit the whole community. Car Clubs New development will be required to contribute to the borough's public car club network by: P. O. Providing accessible spaces on site or contributions to deliver bays on-highway; Q. P. Encouraging residents to use the network as an alternative to car ownership with a free membership and active promotion; R. Q. Contributing to the monitoring of the schemes throughout Section 106 agreements, in line with Policy 96 'Infrastructure and Developer Contributions'

#### MM131 150 64 Policy 64 - Public Transport

The Council will ensure that development is properly integrated with the public transport network by: A. Working with TfL, Network Rail and other partners to reopen the Meridian Line and to facilitate improvements to public transport infrastructure (Bus, National Rail, Underground, or Overground network) with regard to capacity, provision of interchanges, step-free access and the phased introduction of a fully electric bus fleet; B. Ensuring connectivity and integration of the public transport network with other transport modes including walking, cycling within and outside the borough; C. Supporting public transport schemes that seek to improve connectivity to local areas with lower Public Transport Accessibility Level (PTAL); , in line with Policy 96 'Infrastructure and Developer Contributions'; and D. Seeking development developer contributions towards enhancing public transport provision and infrastructure in order to mitigate any likely adverse impact of development

#### MM99, MM128 and MM139

**The North of the Borough is poorly served by public transport – We have a Railway line but no underground. We do not even have a direct bus route to our local hospital!**

**Have any of you tried to have building work carried out where there is inadequate street access or parking available?**

**When refurbishing a flat in south Chingford it was difficult enough to get building materials and kitchen/bathroom components delivered and ensuring building equipment could be in situ and as for removal of rubbish when there was no street parking to get a skip.**

**Nightmare.**

**Removing all parking spaces does not just remove the spaces for cars but for all other vehicles and deliveries and large equipment, plus makes it difficult for local businesses to operate.**

**And while reference is made to Blue Badge holders, not everyone who needs a car has a blue badge. It is like saying only those in wheelchairs can access a disabled toilet. Some**

**disabilities are not easy to see. And other conditions may be very debilitating but temporary.**

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 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.

## **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 THERE SHOULD BE DIRECT BUS ROUTES TO THE LOCAL HOSPITAL**

## **Tall Buildings**

MM116 136 57 Policy 57 - Taller and Tall Buildings In some identified locations, such as growth areas and public transport interchanges identified, subject to contextual analysis, and when included as part of a robust place making strategy, Taller and T tall buildings may be supported subject to meeting the requirements of this Policy and the other requirements of this Plan. all of the following policy tests. For the purposes of these policy tests, **the definition of a tall building in the borough is any building of 10 storeys or more**, or any building that measures 30m or more from ground level. “Taller” buildings are those that are taller than their prevailing context and the typical shoulder heights proposed in a development. “Tall” buildings are substantially taller, making a significant impact on the skyline of the borough. A. **Subject to their impact on local character** and context, Taller and Tall buildings will generally only be supported in identified Strategic Locations and Opportunity Sites (see Policy 4, Location of Growth). In addition, for a site to be considered appropriate for a Taller or Tall Building(s), the following further locational criteria will also be considered: on certain sites identified for a Transition or Transformation approach to character intensification, in line with Policy 8 ' Character-led Intensification'. These sites have been identified in Figure XX. The acceptability of tall buildings on these sites remains subject to thorough contextual analysis, a robust place making strategy, and assessment against all relevant policy tests in the DevelopmentPlan. i. proximity to public transport interchanges; ii. public transport accessibility; iii. walking and cycling networks; and iv. nearby facilities such as shops, community facilities and social infrastructure. B. In general, the appropriate range of heights for new

tall buildings is between 10 and 17 storeys in height. On some Transformation sites however, there may be the opportunity to exceed this and, subject to contextual analysis, a robust placemaking strategy, and assessment against all relevant policy tests, buildings of 18 storeys or more may be acceptable. Indicative ranges of potentially acceptable heights for these sites will be provided in Local Plan 2 - Site Allocations. BC. Taller and Tall buildings are unlikely to be supported outside Strategic Locations and Opportunity Sites. In some limited circumstances however, subject to local character and context, and where an opportunity for Transition or Transformation is justified and agreed (normally at pre-application stage) in accordance with the approach to intensification set out in Policy 8, (Character-Led Intensification) , Taller and/or Tall buildings may be considered appropriate. Such sites could include: In other very limited circumstances, a tall building may be supported on a site outside of those sites identified on Figure XX but only where a Tall Buildings Assessment (which has been undertaken and endorsed by the Council prior to the determination of a relevant planning application) demonstrates that: i. The site is located within a Strategic Location; ii. The site benefits from good local public transport connectivity; iii. The site is appropriate for a 'Transition' or 'Transformation' approach to character-led intensification; iv. All relevant policy tests have been undertaken and assessed against appropriate contextual analysis and a robust place making strategy; and v. A tall building(s) on the site would be able to fully satisfy all policy requirements and deliver exemplar design, having regard to the considerations below (including Visual Impacts, Environmental Impacts, Functional Impacts and Cumulative Impacts) "Gateway" sites or key entrance points into the Borough; 38 "Landmark" locations at key junctions along principal routes; 39 Central areas or key junctions within designated centres; or 40 Sites fronting large areas of open space, subject to there being no harmful impact on openness and visual or physical amenity. 41 Where Taller and Tall buildings are proposed, they should come forward as positive design intentions, such as marking a location of civic, cultural or landmark importance, rather than solely to increase density. They should contribute positively to their context and be part of a successful composition of building heights. D. Where justified in accordance with Criteria (A) to (EC), tall buildings will be supported where they achieve Exemplar Design, having regard to the following additional design considerations will apply to tall buildings, in addition to those set out in Policy 56 'Delivering High-Quality Design' and Policy XX 'Building Heights': Where a location is deemed suitable for Taller or Tall buildings, the following ranges of height are recommended, in accordance with the policy approach set out in Policy 8 (Character-Led Intensification). This guidance remains subject to thorough assessments of context and character.

**Building Heights** All development proposals will be expected to address issues of height and scale with regard to the impact on the local and historic context, as set out in Historic England Advice note 4 (or equivalent) and other relevant guidance. Where justified in accordance with Criteria (A) to (E), the following additional design considerations will apply to Taller and Tall buildings: Visual Impacts i. Impact on the existing character and townscape of their surroundings considered in long[1]range, mid-range and immediate views; ii. Impact on the existing streetscape, including the provision of active frontages and sufficient, high quality public realm at ground level; iii. Impact on the existing, and where relevant emerging, skyline; iv. Contribution to existing and proposed spatial networks and hierarchies, wayfinding, and legibility; v. Impact on local heritage assets, their settings, and views into and from them, including the background zones of views identified in the London View Management Framework (LVMF) Heritage assets include conservation areas, listed or locally listed buildings and parks and gardens; and vi. Exemplar quality High Quality of architecture and design with careful attention paid to form and proportionality, materials, finishes, and details; Environmental Impacts vii. Avoidance of harmful overshadowing or other impacts that would compromise the comfort and enjoyment of surrounding public open space, private or communal outdoor spaces, private amenity of neighbouring properties, watercourses and canals; viii. Avoidance of harmful environmental impacts in relation to overcrowding, overheating, wind movement, solar glare, microclimatic conditions, air, noise and light pollution and bird and bat strikes ix. Use of sustainable design, materials and construction methods; Functional Impacts x. Demonstration of the safety of all occupants, including considerations such as internal and external design, construction detailing, materiality, and emergency exit routes; xi. The impacts of servicing, maintenance, and building management on safety, quality, and enjoyment of the surrounding public realm; xii. Connection to public transport, walking and cycling networks and access to nearby facilities such as shops, community facilities and social infrastructure; xiii. The avoidance of interference to aviation, navigation and/or telecommunications; and Cumulative Impacts xiv. The cumulative visual, functional, and environmental impacts of proposed, consented and planned tall buildings in the surrounding area 14.11 In line with the Characterisation and Intensification Study (2019), Policy 8 Character-Led Intensification) of this Plan sets out an approach to intensification based on the categories of Reinforcement, Transition and Transformation. Table 14.1 in Policy 58 (Taller and Tall buildings) sets out recommended ranges of heights for each of these categories, based on the evidence provided in that study. 14.12 The recommended ranges of height for taller buildings begin at 6 storeys to reflect the impact that such a height could have on the generally low-rise nature of some of the borough's built



environment. Above that, the ranges reflect the distinction in architecture found between existing examples in the Borough. 14.13 Development proposals will be expected to determine which approach to intensification is most appropriate given the character and context of the site under consideration. This will be subject to agreement with the Local Planning Authority, likely at pre-application stage, and will require clear and compelling justification. Sites identified in the Site Allocations DPD will provide guidance as to whether they are appropriate for Reinforcement, Transition or Transformation. 14.14 Further site specific detail on the approach to intensification and building heights for strategic and key sites across the borough is set out in the Site Allocations DPD, and further guidance on the location, quality and composition of Taller and Tall buildings will be found in Supplementary Planning Documents including an updated Urban Design SPD, area specific masterplans and planning/development briefs and frameworks.

#### MM119 137 New Paragraph

As set out in Policy 57 'Tall Buildings', new tall buildings in Waltham Forest are defined as being between 10 storeys (or above 30m when measured from the ground) and 17 storeys and will only be supported on certain sites identified for a Transition or Transformation approach to character-led intensification, as identified on Figure XX. On some Transformation sites which are likely to see extensive change, there may be opportunities for buildings of 18 storeys or more in height. Where the Council considers a Transformation site to be potentially suitable for tall buildings of 18 storeys or more, a range of heights will be indicated in Local Plan 2 - Site Allocations. Inclusion as a site with potential for tall buildings in figure XX or in Local Plan 2 – Site Allocations does not mean that buildings of the heights identified are automatically acceptable. Any proposals for tall buildings on these sites will be subject to full consideration against all relevant planning policy, including that set out in Policy 8 'Character-led Intensification', Policy 56 'Delivering High[1]Quality Design', Policy 57 'Tall Buildings' and Policy XX 'Building Heights' to ensure that they are appropriate for their location and do not lead to unacceptable impacts on the local area. Clause C of Policy 57 'Tall Buildings' does not provide an alternative to compliance with Clauses A or B, but rather acknowledges that, over the Plan Period, evidence may be developed to support the delivery of a tall building on a site that is not currently identified on figure xx. This is only anticipated in very limited circumstances and will only be supported where a Council led Tall Buildings Assessment supports a tall building on the site. Examples of such limited circumstances could include opportunities to signify a new use or public space of civic importance, framing or defining key views or to enhance an existing cluster of tall buildings. As set out in the policy, this will only apply in Strategic Locations, on sites with good public transport connectivity, that are suitable for a Transition or Transformation approach to character-led intensification and where all other policy tests can be met. All tall buildings will also need to demonstrate exemplar architectural and design quality to be considered acceptable. Further detailed guidance on the Council's expectations regarding the design and architecture of proposals for tall buildings will be set out in the Exemplar Design Supplementary Planning Document (SPD) Appropriate building heights for new development will vary in response to the prevailing character and building heights of that part of the Borough, in line with the approach to character-led intensification set out in Policy 8 'Character-Led Intensification'. A. Building heights for new development will generally be acceptable where they fall within the ranges set out in Table XX below. This remains subject to thorough assessments of context and character and all of the Exemplar Design criteria set out in Policy 56 'Delivering High Quality Design'. C. All development proposals should address issues of height and scale with regard to impact on the local and historic context, as set out in Historic England Advice note 4 (or equivalent) and other relevant guidance.

MM121 136- 137 14.8 (Relocated under New Policy – Building Heights) The character and built context of Waltham Forest, including predominant building heights, varies across the borough. In line with the Characterisation and Intensification Study (2019), Policy 8 'Character-led Intensification' of this Plan sets out an approach to intensification based on the categories of Reinforcement, Transition and Transformation identified for different parts of the borough. Table XX in Policy XX (Taller and Tall Buildings) 'Building Heights' sets out recommended ranges of heights for each of these categories, based on the evidence provided in that study. The recommended ranges of shoulder heights for taller buildings begin at 6 storeys to reflect the generally low-rise nature of some of the borough's built environment. Above that, the ranges reflect the distinction in architecture found between existing examples in the borough

#### 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.

I hope you will take my comments on board,

Yours sincerely,

Catherine Skeggs