

## Comment

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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 higher target than 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.

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".

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 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."

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 location 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. 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.

MM139 should also be amended to reflect this 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 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. The Council should aim to improve connectivity for residents in the North of the Borough to enable ease of access to leisure facilities there should be a sustained effort to reinstate bus services to areas of Essex .