

Direction of Travel Consultation Report Schedule of Comments and the Councils Response

Consultee Name	Organisation	Comment	Council (Officers) Response
		INTRODUCTION	
Andrew Haughey	Capital & Regional	We note that, on adoption, the emerging Local Plan will replace a number of existing Development Plan documents including the Core Strategy and Walthamstow Town Centre Area Action Plan (AAP). In relation to The Mall shopping centre and adjacent Town Square and Gardens, our Client requests that the Core Strategy and AAP allocation, for the extension/redevelopment of the shopping centre is carried forward into the new Local Plan and the boundary of the indicative built footprint is extended, to ensure consistency with the Planning Committee resolution, on 13th December 2017, to approve the current planning application for the extension/redevelopment of this key opportunity site.	It is noted that the planning permission has been granted for the extension/redevelopment of The Mall shopping centre. Allocated and unimplemented proposals will be carried forward to the new plan.
Aviva Investors	Aviva Investors	We note that, on adoption, the emerging Local Plan will replace a number of existing Development Plan documents including the Core Strategy, Northern Olympic Fringe Area Action Plan (AAP) and the emerging Lea Valley Eastside Vision (AAP). In relation to Leyton Retail Park, our Client requests that the aims of the Northern Olympic Fringe Area Action Plan (AAP) and the emerging Lea Valley Eastside Vision AAP reflected in the new Local Plan.	The Council is preparing a new plan. The aspirations and commitments in previous plan documents will be reviewed and where necessary and justified, carried over to the new Local Plan.
		SETTING THE SCENE	
Dr Sophie Donaldson	LB Newham	We are generally supportive of the aims and objectives as laid out in the consultation documents. In particular those pertaining to the delivery of new homes for London and the facilitation of economic growth, helping to achieve the careful balance between jobs and homes to serve the increasing pressure on employment land and housing delivery in the East London sub-region. The London Borough of Newham (LBN) is satisfied that at present the London Borough of	This is noted.

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		Waltham Forest: New Local Plan Direction of Travel document does not present any cross-boundary strategic issues.	
		TRANSFORMATION OF THE BOROUGH	
Ms Lucy Harrison		12,000 new homes is a huge number without the additional infrastructure to support them. Although the affordable homes percentage is ok, this is not social housing or genuinely affordable rent to help people who really need it. Please do not underestimate how let down people in Lea Bridge felt about 97 Lea Bridge Road, which we commented on with diplomacy and helpful suggestions and were completely ignored by the planning committee. It has made us feel as if there is no point engaging with the process when our suggestions were so comprehensively ignored. It has a low level of affordable housing and does not adhere to many other local guidelines. It also removed several businesses from the borough and destroyed buildings which could have been restored for different uses.	In planning for growth, the need to ensure the delivery of supporting infrastructure and as well provision for affordable housing is noted. The new Local Plan will be supported by an Infrastructure Delivery Plan. It will also contain policies on affordable housing provision.
Mr Bob Sharples	Sport England	About redeveloping Ive Farm Field, it is stated that the new sporting facility will include two full-size 3G/4G outdoor sport pitches, a 60m sprint track and a four-court beach volleyball arena. There is no such thing as 4G when describing artificial grass pitches. This has been banded around by some suppliers, but in actual fact it is 3G. I would suggest rewording this bullet point thus for accuracy to state that "We are redeveloping Ive Farm Field. The new sporting facility will include two full-size 3G Artificial Grass Pitches, a 60m sprint track and a four-court beach volleyball arena."	The reference made to 4G outdoor sport pitches is noted.
Mr Bob Sharples	Sport England	About providing more leisure facilities to ensure improved health and well-being of residents, Sport England supports Waltham Forest in their endeavours to provide more leisure facilities and would encourage the authority to carry out a built facilities strategy to underpin this venture.	The Council notes the Sports England recommendation to carry out a built facilities strategy to support the development of more leisure facilities.
Mr		There is nothing about commitments to securing environmental	The issues raised regarding environmental quality, in

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Mathew Frith		quality, whether reversing biodiversity declines or improving air quality. We welcome the measures to enhance access to nature (e.g. Walthamstow Wetlands) but these need to be integrated to policies to protect and enhance the natural environment.	particular relating to biodiversity and air quality are noted for detailed consideration in the new Local Plan.
Mr Mathew Frith		There are no explicit commitments to protecting and enhancing the natural environment for its intrinsic benefit. The borough supports land of international importance for nature conservation (Lee Valley SPA and Epping Forest SAC), as well as sites of national and regional importance. With increasing pressures of usage and development, there is a danger that their ecological resilience is damaged. We have worked with the borough on the design, development and delivery of Walthamstow Wetlands, but this project also needs to secure biodiversity gains for the wider Lee Valley. Similar aspirations, in line with the NPPF's requirement for the Local Plan to set out ecological networks (to be protected and managed as such), should be set out here.	The Council notes the comments made relating to the need for clear commitments on the protection and enhancement of the natural environment. This will be taken forward in the development of policies included in the Local Plan as further studies are commissioned.
Ms Alison Griffin		With regard to schools (paragraph 3.9), I know that Coppermill School (my local school) has complained earlier this year to the Council for announcing an expansion which has been mooted but not yet consulted or decided upon. So it cannot yet be announced - although the fact it is being considered perhaps could be.	The Council notes the need to consult on school expansion plans before announcements are made. With specific reference to Local Plan preparation, the Council has published a Statement of Community Involvement which sets out how residents, businesses and all stakeholders should expect to be engaged during the plan making. A draft Local plan will be published for public consultation.
Mr Daniel Palman	Berkeley Homes (North East London) Ltd	Berkeley Homes has strong aspirations to work in the Borough as we see it as a major focus for regeneration over the next twenty years. We are keen to work with the London Borough of Waltham Forest (LBWF) to deliver strategic high quality developments that make a lasting and positive impact on existing communities and open up new opportunities to assist the Council in building more homes.	The Council welcomes the commitment of Berkeley Homes to support the regeneration and the delivery of high quality developments in the Borough.
Ewan Coke	LB Redbridge	The Direction of Travel (DoT) document outlines the progress	Support noted.

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		<p>Waltham Forest has made with regard to housing and affordable housing delivery, including large scheme consents for the build to rent tenure. The number of homes being delivered is positive, considering the objectively assessed need (OAN) in the borough of almost 2,000 homes per year. Through previous duty to cooperate discussions between Redbridge and Waltham Forest, it is understood that Waltham Forest is unlikely to meet their OAN. However given the London wide approach taken to the assessment and delivery of housing need set out in the London Plan, any such unmet need is dealt with at regional level rather than expected to be at borough level. With regard to infrastructure the opening of new areas of open space and leisure facilities and improved community infrastructure, such as Whipps Cross Hospital, could benefit Redbridge residents travelling to Waltham Forest to use these facilities, and we support these aims.</p>	
Mrs Claire McLean	Canal & River Trust	<p>We note that housing authorities now have a requirement to "consider the needs of people residing in or resorting to their district with respect to the provision of places on inland waterways where houseboats can be moored", under section 124 of the Housing and Planning Act 2016. CLG 's draft guidance suggests that once this has been undertaken the local authority 's planning team should be engaged in developing solutions to meet need. The Trust would be keen to discuss this assessment with the council if it has plans to undertake one.</p>	<p>The Council acknowledges the requirements relating to Section 124 of the Housing and Planning Act 2016. The Council has no evidence of demand for residential moorings and has no plans to carry out such assessment.</p>
Aviva Investors	Aviva Investors	<p>We note that the Draft New London Plan has been published, since the LBWF consultation document was prepared. As indicated in the LBWF consultation document, the proposed housing target for Waltham Forest has significantly increased, from 862 dpa to 1,794 dpa. The adopted Local Plan will need to respond to this change and ensure there is sufficient flexibility built into its policies to accommodate future changes to the housing requirement, both</p>	<p>The draft London plan housing targets for the Borough and policies relating to the potential of town centre sites in bringing forward new housing is acknowledged. The London Plan is also part of the Council's development plan. Accordingly, in preparing the new Local Plan, the Council will ensure that there is general conformity with the emerging/adopted</p>

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		<p>during preparation of the Local Plan and during the plan period. The consultation document lacks clarity regarding the current London Plan housing target, and how this compares to the LBWF target, as one is expressed as an annualised target, while the other is expressed as an overall target presumably for the previous plan period. In addition, the Draft New London Plan Policy SD6 to SD9 relates to Town Centres and applies a 'Town Centres First' sequential approach, acknowledging that these have the capacity to deliver significant levels of new commercial and high-density housing. A key change within the Plan is the acceptance that edge of centre locations can also contribute more, and that the 'redevelopment of retail and leisure parks to deliver housing intensification is encouraged' (2.8.3). The policy explains that for town centres or sites within 800m of a tube/rail station with an existing or planned PTAL of 3-6, the emphasis is on optimising the potential for housing delivery. The Draft Plan takes a strong town centres first approach and encourages higher density residential only schemes outside of primary and secondary shopping frontages, where they would not undermine local character or the viability and vibrancy of a town centre. Surface car parks and other low density town centre buildings are identified as potential development opportunities. We consider that the Local Plan should refer to these policies and ensure that it conforms with the Draft New Local Plan.</p>	<p>policies of the London Plan.</p>
		<p>POLICY AND STRATEGIES</p>	
<p>Mr Bob Sharples</p>	<p>Sport England</p>	<p>I would strongly urge Waltham Forest to commit to carrying out a Built Facilities Assessment as advised by the National Planning Policy Framework paragraph 73 . The assessment then can be turned in to a robust strategy in order to build upon soundly the work they have already successful carried out around leisure facilities previously mentioned</p>	<p>The Council notes the Sports England recommendation to carry out a built facilities strategy to support the development of more leisure facilities. This is being considered.</p>
<p>Mr Tim</p>	<p>Historic England</p>	<p>It is not clear from the consultation document how evidence referred</p>	<p>The document seeks to draw attention to available</p>

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Brennan		to has been used to inform the text as it stands. To reflect national policy and guidance, we would expect to see evidence that is robust, inclusive and not simply focused on quantitative aspects of the historic environment, for example containing details of condition and the positive contribution it can make to wider policy areas in the Plan.	evidence setting out the context for the higher level issues identified. The Local Plan will draw on further evidence and reference this in more detail.
Mr Tim Brennan	Historic England	We are surprised that other studies completed by the Council have been referenced within the consultation document – including the Characterisation Study and the Urban Design SPD which has clear relevance to delivering new development that works successfully with its context. While it may be that these require updating, it would provide a suitable platform for understanding the Borough’s development and providing the basis for a character-led approach to new development across the Borough.	This is noted. The new Local Plan to be prepared will draw on up to date evidence and reference this in more detail in the subsequent consultation documents.
Mr Tim Brennan	Historic England	We note where the Borough Council is in terms of its Local Plan preparations and as such acknowledge that the policy directions as set out in each section are aspirational rather than a detailed delivery mechanism. As a result, we would reiterate that a significant degree of work remains to be done to develop the policy framework that will realise successful conservation and enhancement of the local historic environment.	This is noted. The new Local Plan will include detailed policies.
Mr Tim Brennan	Historic England	The NPPF specifies that an up to date and relevant evidence base should be used in the preparation of a Local Plan. We note the text on page 25, together with the further evidence-base documents that are available on the Council’s website. However, we consider that in relation to the historic environment this is at best partial, out of date in some cases and may be inadequate in NPPF terms. We note that the list of conservation areas (and therefore accompanying appraisals and management plans) is incomplete, while the English Heritage/CABE Guidance on Tall Buildings was replaced by Historic England Advice Note 4: Tall Buildings in December 2015.	This is noted. The new Local Plan will be supported by up to date evidence. It will include full information on conservation areas and other heritage designations.
Natalie	The Community	We are concerned that the Food Strategy is absent from the diagram	In preparing the new Local Plan, the Council will

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Szarek	Food Growers Network	of strategies that feed into the Local Plan (clause 4.18). Although the food strategy remains unpublished, other strategies which are still in progress are mentioned (e.g. the Digital Strategy and the Waltham Forest Transformation Strategy.) We would like to see a dedication to finalising and publishing the Food Strategy, and an explicit acknowledgement of how the Food Strategy feeds into the Local Plan. Policy Proposal: Waltham Forest to integrate food production into strategic assessments, funding streams and new developments in recognition of the various benefits of the sector and positive land use activity including; access to green space, mental health, enterprise generation, training, personal development, community well-being, access to fresh and healthy food, reduction of carbon footprint in food industry	consider how best to integrate food production objectives in policy development relating to housing, health, local economy and the environment.
Section 5 - SCALE OF CHALLENGES AND OPPORTUNITIES			
Alice Roberts	Campaign to Protect Rural England (CPRE)	Cars do not appear to be mentioned in the document : 1. The plan should reflect the draft London Plan policies to restrict car parking in new developments, preferably to zero spaces per unit wherever possible, with developments located near to public transport, walking and cycling options. 2. There are a number of car parks in the borough where parking could be further restricted or the sites could be intensified to accommodate development. 3. The Plan should be underpinned by a target for increased proportion of journeys taken by sustainable modes (public transport, walking and cycling)	The Council's Local Plan when prepared will reflect London Plan policy requirements regarding car parking, intensification of development and the development of sustainable transport modes - public transport, walking and cycling.
Transport for London		Generally, we agree that the challenges and opportunities facing the borough have been identified and that the Plan is being positively prepared. However, we would add that adopting the 'healthy streets' approach, making it more attractive to walk and cycle and with the associated health benefits, should be a component of delivering climate change resilience (page 33). The borough is already a	The Council intends to apply the 'healthy streets' approach, building on the 'Enjoy Waltham Forest' programme.

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		pathfinder, for example, having adopted the 'Little Holland 'approach.	
Ms Lucy Harrison		I feel that crime is a concern of many local residents.	Working with the Police and other partners, it is intended to include appropriate local plan policies to create safe, secure and appropriately accessible environments to ensure that crime and disorder, as well as the fear of crime do not undermine quality of life of residents and community cohesion.
Mr. Gordon Turpin		It will also be a challenge to maintain the leafy character of the Borough whilst meeting the challenges listed above. Protecting our green and open spaces is vital for the health and wellbeing of local residents.	This point is acknowledged. The new Local Plan will set out policies to manage growth and change sustainably by making the best use of brownfield land and protecting valued green and open spaces.
Jeremy Dagley	Corporation of London	Need for a Protection, Enhancement and Mitigation Strategy for Epping Forest SAC. In particular, we would like to acknowledge your Council's proactive approach in supporting the recent Epping Forest Visitor Survey coordinated by Epping Forest District Council on behalf of the four-authorities Strategic Housing Market Area (SHMA) group. The results from this survey should provide some of the evidence required to help inform a strategy for protecting and enhancing the Forest's natural environment from the increasing pressures that are foreshadowed in the Direction of Travel document. Those pressures relate, in particular, to the proposed increase in housing and the concomitant generated traffic pollution and the increased recreational pressure and urbanization impacts on the Forest (e.g. fly-tipping, litter, soil compaction, noise, light, disturbance). More evidence needs to be gathered about the impacts of air pollution "various compounds of nitrogen " largely generated by traffic. We hope that your Council will also take part in this evidence-gathering work that the SHMA group has agreed to undertake, given the likely impact of LBWF 's growth in population and activity.	The Council recognises the challenges associated with the protection and enhancement of the Epping Forest SAC and is willing to support partnership working towards the development of a Mitigation Strategy.
Aviva Investors		Our Client welcomes recognition of the challenge faced by Town Centres and High Streets, given the competition presented by larger	Support noted.

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		nearby centres and online retailing. Our Client, agrees with the Council 's statement that: 'It is vital to ensure that Town Centres and High Streets in the Borough have a modern, diverse, distinctive and resilient offer; both in the daytime and evening so they can continue to flourish ' (Page 32)	
Ms Celia Smith		Regarding transport infrastructure, a significant challenge / opportunity will be responding appropriately to the population increase in the borough. While schemes such as mini-Holland have made the bulk of residential streets quieter and more appealing to cyclists and walkers, road transport has suffered significantly. Not just private vehicles (which due to Walthamstow's location, are stuck using single lane routes through the borough) but public transport is affected. Bus journeys across the borough seem to be inadequate for current needs and housing locations. There would seem to be an opportunity with TfL to do a more fundamental review of routes across the borough to connect newly developed areas and make car journeys less appealing, e.g more short feeder bus services to hub train / tube locations; more ring route type services around Walthamstow town centre etc. Currently, the Blackhorse Rd, Selbourne Rd, Palmerston Rd, Hoe St routes are basically traffic jams in peak times leading to increased pollution, journey times and reduced amenity.	The issues raised regarding the road transport conditions, delays to bus journeys, and the need to work with TfL on the review of routes are noted. The Council will continue to work in partnership with TfL in developing appropriate sustainable transport policies for inclusion in the new Local Plan.
Ms Celia Smith		Regarding maintaining a distinctive town centre. While increasing density of housing is a necessary requirement given the increased population pressures in London, there should be a clear height limit across the borough (say 10-15 storeys) so as not to dilute Walthamstow's "town" feel. The recent mall outline planning application cited the Mayor's guidance on tall buildings being concentrated in town centres however then used a number of comparatively low rise examples to provide context. Buildings above this 10-15 storey height will be completely out of scale with the	It is intended to include appropriate local plan policies to guide the development of tall buildings. To inform policy development, the Council intends to carry out a Characterisation and Intensification study.

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		borough's distinctive feel - places like Stratford are more appropriate to higher buildings given their existing (and developing) density of new, tall buildings and other infrastructure associated with the Olympic Park new land uses.	
Mr Philip Herlihy		Local people trust the council less and less. I once worked alongside the consultations and engagement teams (in my capacity then as Community Council Chair) and used to work hard to explain the (inevitably limited) contribution of consultations (etc) in the decision-making process, which of course has to take into account other constraints, including finance, legislation and externally applicable plans, like the London Plan, and the National Planning Policy Framework. I've largely given up trying to make this case. Today's challenge is that local people routinely distrust the council's motives. An alarming proportion of people believe that transportation changes, including mini-Holland and the relentless roll-out of CPZs, are either the result of doctrinaire local politicians deciding they know better than the people they supposedly represent, or (worse) are a self-seeking attempt to promote individual political careers by packing a CV with fashionable projects. Similarly (and with even less actually supportive) the recent decision on the Mall development is seen as a surrender of land held in trust for local people for the benefit of corporate investors, with a few minimum-wage jobs (and some water-jets) as a sop to sweeten the pill, reducing genuine open space to a gap between buildings.	Comment noted.
Andrew Haughey	Capital & Regional	About the competition presented by larger nearby centres and online retailing, our Client agrees with the Council 's statement that: "It is vital to ensure that Town Centres and High Streets in the Borough have a modern, diverse, distinctive and resilient offer; both in the daytime and evening so they can continue to flourish" (Page 32)	Support noted.
Aviva Investors		The following should be added to the list of challenges for the new Local Plan: - Promoting patterns of development that reduce the need	This point is acknowledged for inclusion in the new Local Plan to be prepared.

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		to travel (i.e. considering the relative positions of employment and residential uses “ and promoting appropriate mixed-use opportunities - Added to the list, and more specific than simply ‘Design ‘ should be ‘Delivery of high quality place-making ‘. This is a common element to all of the challenges facing the Borough.	
Mr Philip Herlihy		<p>There have been council-led changes which seem to me and to others to have gone against this [creating liveability]. I always supported the movement to shift transportation towards walking, cycling and public transport, and actively supported (even canvassed for) mini-Holland at the outset. Yet the introduction of vehicle barriers has made life significantly less survivable for many people. Those like me who have struggled to run a small self-employed business from home often find themselves spending longer working and travelling for less return “ my own business has seen its turnover more than halved since the roads were closed as customers are now reluctant to deliver their equipment to me for servicing, and expect me to collect and deliver. For the same hours, I earn substantially less, as so much of my time is spent travelling now. I understand the arguments about creating safe areas for cycling and walking, but where I live there has never been a recognisable problem for pedestrians or cyclists (I ‘m both) yet these changes completely ignore the time-pressures of modern living. Many self-employed people have businesses which are marginal “ mine is really no longer viable, and if I can ‘t move I will have to give it up. The council did this, for reasons which many believe have more to do with reputation than a deep understanding of and concern for the needs of residents. You ‘ve basically put me out of business. Who is getting a corresponding benefit?</p>	The issue raised regarding the impact of the Mini-Holland scheme is noted for referral to the Council’s Enjoy Waltham Forest Programme Team.
Mr Mathew Frith		There is nothing about environmental quality, for example biodiversity loss and resilience. The State of Nature report (2013, 2016) indicated a continuing loss of urban biodiversity, and although	This point is acknowledged. The new Local Plan will include policies on environmental quality – including biodiversity and the protection of species.

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		the picture is mixed across London, declines in key taxa do need to be addressed at a borough level through appropriate protection and policies.	
Keira Murphy	Planning Specialist Environment Agency	We must continue to play a role in tackling climate change, by reducing carbon dioxide emissions, delivering improvements to flood risk, air quality, recycling and waste management. However, we think there could have been more expansion on the nature of those challenges for Waltham Forest. For example, the watercourses in Waltham Forest are suffering from poor water quality and in need of enhancement. One of the key factors affecting the water quality is plumbing/drainage misconnections, which means domestic waste water from washing machines, dishwashers, sinks, is discharging into a surface water sewer pipe into watercourses, such as the Ching Brook. Therefore, alongside the challenges of ensuring adequate waste water infrastructure for new development, a significant challenge for Waltham Forest is water quality and ensuring there is no further deterioration. The river Lea forms a natural boundary to the west of the borough along with reservoirs, designated habitats and areas of flood storage. This is a particularly sensitive area, providing green infrastructure and climate change resilience for the borough and warrants protection and enhancement.	The issue regarding water quality and the protection of watercourses is acknowledged. The new Local Plan will include appropriate policies to manage the impact of new development on watercourses and to safeguard water quality.
Ewan Coke	LB Redbridge	We recognise the challenges for Waltham Forest identified in this section of the DoT document as similar to those faced by Redbridge in key strategic planning issues such as housing, transport, health and community facilities and infrastructure, and we look forward to working together with Waltham Forest on such key planning issues.	Comment noted.
Mr Philip Herlihy		Broadly, it's hard to find fault in the document itself, which is surprisingly readable, very informative, and really very well-produced. It's harder, of course, to identify things that have been left out.	Comment noted, in particular, relating to the community values expressed through the Sustainable Community Strategy (2009). The new Local Plan will

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		<p>However, there are two themes I'd want to emphasise, and I hope this email (admittedly late by up to an hour) can be accepted. The 2008 'sustainable Community Strategy' put a finger on what has always been since my own guiding principle in these discussions ' People aspire to live here '. If we (and I prefer to think of the Council and WF residents as a partnership) get that right, we 'll get most things right. It places value on the 'liveability' of a place, which encompasses not just the space itself " though that's important " but the heritage and identity that people feel about what is after all their 'home' neighbourhood, the survivability of housing, employment and transportation, and the character of places which draw people to move and stay here. I'll die here (though hopefully not for some considerable time).</p>	<p>include a vision statement, which seeks to carry forward the identified values and aspirations of the Waltham Forest Community.</p>
Natalie Szarek	The Community Food Growers Network	<p>Evolving Economy: The local economy can be substantially invigorated through food growing businesses "Waltham Forest is home to several local food businesses (OrganicLea, WalthamGrow) which generate employment, boost the local economy, and enhance the commercial offer to local residents. Climate Change and Sustainability: food growing and green infrastructure (such as green roofs) are key to reducing flood risk and boosting sustainability " we would like to see green infrastructure and food growing spaces noted as components of a strategy for tackling flood risk, air pollution, and climate change.</p>	<p>The issue identified relating to green infrastructure and food growing spaces as components of a strategy for tackling flood risk, air pollution, and climate change is noted for inclusion in the new Local Plan.</p>
Alice Roberts	Campaign to Protect Rural England (CPRE)	<p>We recognise that Waltham Forest is a leader in terms of sustainable transport and implementing the Healthy Streets agenda. We believe there is an additional unidentified opportunity which links to this, in 'Getting People Outdoors' which has potential in terms of 'outdoor economy', linking with opportunities 2 (economy), 8 (culture) 13 (outdoor spaces) and 5 (health), including recognising the opportunities for outdoor economy around sports, leisure or other activities e.g. walking tours, personal training, walk/run/cycle events etc., for social prescribing via schemes like Croydon 's Natural Health</p>	<p>The point made relating to 'Getting People Outdoors' is noted for further consideration and inclusion in the new Local Plan through ongoing evidence base commissioning .</p>

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		Service (getting people outdoors to improve their physical and mental health), and for walking via 'healthy streets' and creating walking routes which also take people to and through green spaces	
Mrs Claire McLean	Canal & River Trust	In LB Waltham Forest, we own and manage the River Lee Navigation, and the towpath that run along one side of the waterway. Recognised in Chapter Seven of the London Plan, canals and rivers form a key part of the Blue Ribbon Network and do, or have the potential to provide important areas for recreation, biodiversity, sustainable transport (with a related air quality benefit), business, tourism, a focal point for cultural activities, a heritage asset and, increasingly, are a space where Londoners are choosing to live. Waterways can also provide a resource that can be used to heat and cool buildings, a corridor in which new utilities infrastructure can be installed and a way of sustainably draining surface water away from new developments. These valuable local assets are very well used within LB Waltham Forest for walking, cycling, jogging, dog walking, angling, rowing, and by boaters. The canals bring a unique heritage value to the areas they pass through, and contribute to a strong identity of place	The role and potential of waterways, in particular River Lee Navigation is acknowledged for inclusion and reference in the new Local Plan.
Mr Mathew Frith		It's not just access to green spaces, but enhancements to green spaces to enhance their ecological resilience in the face of development pressures, visitor pressure and climate change. We'd like to see policy commitments to creating greater ecological connectivity to the two broad 'corridors' down the east and west boundaries of the borough (Lee Valley, Epping Forest-Wanstead), as well as commitments to addressing the Areas of Deficiency in the south central part of the borough.	The need to create greater ecological connectivity between east and west boundaries of the borough is noted for consideration in policy formulation through the commissioning of a Green Infrastructure study in addition to the ongoing Open Space strategy.
Keira Murphy	Environment Agency	The following opportunity could have some environmental benefits: The Borough has a network of open green spaces, which act as green lungs and places of recreation. Examples of these are: Walthamstow	The issues raised including access and improvements to Wetlands, Epping Forest and Lea Valley Park, rivers improvements to water quality, wildlife habitats etc

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		<p>Wetlands, Epping Forest and Lea Valley Park. There is an opportunity to improve and enhance access. However, there is a distinct lack of opportunities to improve the natural environment in this section. There are opportunities to improve and enhance rivers in Waltham Forest so that they make a contribution to green infrastructure and biodiversity. There are opportunities to improve water quality across the borough, to reduce flood risk and create space for water, to clean up contaminated land, to reduce and re-use waste and improve air quality. Although it is recognised that there is a network of open green spaces and there is an opportunity to improve and enhance access, there should be recognition of the opportunity to improve habitat for wildlife. We recommend you consider our detailed comments on each of these issues and consider the opportunities and how the Local Plan could make a positive change.</p>	<p>are noted for consideration in policy formulation and further exploration in evidence base commissioning.</p>
<p>Aviva Investors</p>		<p>The reference under opportunities to ‘using land and sites more efficiently ‘needs to go much further than this. To deliver the number of new homes that the New London Plan will be seeking to achieve and secure the level of economic growth required, a step change in the intensification of the urban areas of the Borough will be needed “largely through significantly increased density of new development. The opportunities should therefore include ‘a step-change in intensification and optimising the use of land in redevelopment schemes ‘ and ‘fully exploring and supporting co-location opportunities where new homes are constructed together with new employment space on employment sites ‘ (in-line with emerging policies in the draft new London Plan). This should be undertaken in a way where overall industrial floor space capacity is not reduced. A further opportunity associated with ‘good growth ‘ and sustainable patterns of movement is to better manage the more efficient movement of goods that people and businesses in the Borough need “ leading to air quality, highway safety and congestion benefits.</p>	<p>It is noted that a step-change in intensification and optimisation in the use of land is required to deliver London Plan growth targets. The Council also intends to investigate the potential capacity of local areas to accommodate development, whilst also ensuring that industrial floor space is not reduced and good growth principles are promoted.</p>

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Ms Celia Smith		To look again at how transport could be delivered across the borough to better integrate the cycling / walking changes made under mini-Holland and to better connect new residential areas to train / tube hubs.	The need to better integrate the cycling/walking changes made under mini-Holland and to promote better connection with new residential areas is acknowledged.
Mr Bob Sharples	Sport England	<p>Traditional forms of employment have been changing in the last 100 years. Unfortunately the perception of what employment land is has not. The introduction of B8 distribution challenged local authorities in the 80's and '90s as more of these uses came forward. Sport is often overlooked as an employer. It is estimated that there is a total of 1,708 people employed via sport in Waltham Forest with an economic generation of £71.5m into the local economy. There are wider values as well in saving £108.5m in the health economy and generating £4.2m in wider spending with a further £38.8m in volunteering. Looking at statistics for manufacturing employment in 2016 in Waltham Forest the figure is 3,000 that is about double the number currently employed on sport but more land is allocated for manufacturing! But more people are employed in sport than in the financial sectors and information and art sectors!</p> <p>https://www.nomisweb.co.uk/reports/lmp/la/1946157278/report.aspx#tabempunemp https://www.sportengland.org/our-work/partnering-local-government/tools-directory/economic-value-of-sport-local-model/</p>	The contribution of sports to the local economy is acknowledged.
Ms Lucy Harrison		One cannot surround Lea Valley Park with tower blocks and expect it to be as enjoyable and successful.	The visual, functional or environmental impact of tall buildings on Lea Valley Park is noted.
Ms Alison Griffin		With regard to opportunities , I think that developing cultural opportunities (resulting in improved quality of life for residents and potentially attracting funds - it does come under the vision on the subsequent page) and working more collaboratively with strong and effective community groups and organisations (so that the community are better served, and particularly those most in need) - and also referencing this under section 10 (I know there is an aspiration for the	This is noted, in particular, the need to enhance cultural opportunities - encourage local artists, cultural groups and organisations to develop the Borough's local offer.

Consultee Name	Organisation	Comment	Council (Officers) Response
		hubs to house voluntary organisations, for example) are two more opportunities. Linked to this, under 12, I would like to see the council express its intention to continue to work with local artists and cultural groups and organisations to develop the local offering (e.g. E17 Art Trail).	
Ms Sandra MacPhee		Various forms of pollution are a challenge, including noise pollution from aircraft overflying the borough. Cruise emissions from the aircraft also contribute to climate change, health problems and premature deaths.	This point is acknowledged.
National Grid Property Holdings Ltd		It will be important for the Council to allocate enough land for new homes to help meet the Borough's need as this will help address issues of affordability by ensuring supply is sufficient to meet demand.	The Council intends to investigate the potential of local areas to accommodate additional development through intensification and optimisation of density.
Angela Rose		North Chingford is being neglected, and Chingford Assembly Hall is being unused and wasted.	This point is noted. The Local Plan has an important role in safeguarding the vitality of North Chingford centre.
		Chapter 6: OUR VISION FOR WALTHAM FOREST	
Mr Tim Brennan	Historic England	We would suggest that almost of all of the policy directions under consideration are in fact the type of outcomes the Council should be seeking to achieve, rather than options to be weighed up "the challenge is in identifying the policies that will enable them.	Noted. The Direction of Travel document seeks to identify the key issues and policy directions, which will inform the preparation of the draft Local Plan. This will contain detailed policies.
Mr Daniel Palman	Berkeley Homes (North East London) Ltd	We are very encouraged by the aspirations of the Council and its direction of travel to promote higher density developments within growth areas, town centres, opportunity areas and areas of high public transport accessibility within the Borough. This is paramount to achieving and exceeding the Plan's target for the delivery of new homes and jobs.	Support noted.
Ms Sandra MacPhee		No mention of the various forms of pollution and a strategy to combat same	This is noted. The Direction of Travel document seeks to identify the key issues and policy directions, which

Consultee Name	Organisation	Comment	Council (Officers) Response
			will inform the preparation of the draft Local Plan.
Angela Rose		A bit too far ahead	The Local Plans are expected to include a long term vision statement providing the framework for the future development of the area.
Ms Lucy Harrison		I am not clear about how everybody will enjoy a quality life in reality when there is little improvement of infrastructure - e.g. healthcare, for the new residents who will be coming to the borough.	The point made about infrastructure provision is noted. The Local Plan will contain detailed policies addressing infrastructure provision and delivery. The plan will be supported by an Infrastructure Delivery Plan.
Ms Lucy Harrison		Sounds great but I think some of the forthcoming developments cancel some of these aspects out.	The new Local Plan will contain more up to date policies to support planning application decisions.
Mr Bob Sharples	Sport England	I would draw you attention to our Active Design: https://www.sportengland.org/facilities-planning/active-design/ Active Design is about designing and adapting where we live to encourage activity in our everyday lives. It is a combination of 10 principles that promote activity, health and stronger communities through the way we design and build our towns and cities. That's why we, in partnership with Public Health England, have produced the Active Design Guidance. This guidance builds on the original objectives of improving accessibility, enhancing amenity and increasing awareness, and sets out the 10 principles of Active Design. We believe that if Waltham Forest was to engage with the Active Design Principles it will create stronger, healthier and more active communities.	The reference made to 'Active Design Guidance' is noted for consideration – in the preparation and development of the policies for inclusion in the new Local Plan and will be carried forward as part of the development of the Playing Pitch Strategy
Aviva Investors		The Vision statement needs to make reference to the need to reduce travel, encouragement of more intense mixed-use development and optimisation of development and high quality place-making. This should sits across all Vision priorities.	This is noted for consideration.
Mr Mathew Frith		We especially support the commitment to a well maintained network of green spaces with high biodiversity value, providing facilities for sport and active leisure.	Support noted

Consultee Name	Organisation	Comment	Council (Officers) Response
Mr Adrian Stannard	Planning Watch Convenor Civic Society	<p>The vision cannot be achieved by allowing inappropriate building such as excessively high tower blocks out of all proportion to their surroundings. This just creates a poor place to live not a smart place. It is stupid to pretend the Victorian architecture is going to change. The country cannot afford or would want to destroy the history of the area so new development has to blend in with the existing low rise buildings not make a willy waving statement to support politicians' egos. We need to adjust the number of people living in an existing area so that all the services and transport links operate properly. Overcrowding on the tube for instance will simply lead to disaster and deaths of commuters. The Government has to attract people away from London and the South East so that the people in the Midlands and the North get a fair slice of the cake. Currently too much is spent trying to squeeze more people in to the SE and not enough on new Towns and Cities up north.</p>	<p>These issues are noted for consideration – in preparing the new Local Plan.</p>
Jeremy Dagley	Corporation of London	<p>Given the importance of Epping Forest, both international and also to the Borough's green space, we consider that it merits a much higher profile in the draft Vision in Section 6, as well as in Section 15. It is a major asset to the Borough that, along with Walthamstow Wetlands, is of huge benefit to local people and very significantly enhances the quality of life of many residents being accessible to all. Furthermore, the current proposed wording downplays the importance of biodiversity and natural space “linking it, in 6.2.9, only to sport and active leisure. The importance of sustainable, wildlife rich places will become even more important as the Borough grows in population and activity. The Local Plan 's ambition, in our view, should not just be to maintain but to enhance areas for wildlife and connectivity for wildlife across the Borough and improve the existing wildlife-rich places by ensuring they are buffered from adverse impacts. Greening of existing urban spaces, especially with pollution-filtering and heat-dampening trees, and blending these spaces into the neighbouring areas of Forest</p>	<p>These points are noted for consideration – in preparing the Local Plan vision and promoting the importance of the Plan section on Open Space and Green Infrastructure (Protecting and Enhancing the Environment).</p>

Consultee Name	Organisation	Comment	Council (Officers) Response
		should be an ambition of the new Local Plan in our view.	
Catalyst Housing & swan housing asc		The Associations support the Vision for Waltham Forest, particularly the vision for "Good quality homes in safe, liveable, attractive and well-maintained neighbourhoods" and "well managed growth, particularly in the identified growth areas / hubs, where the positive effects of growth and change have been maximised and felt throughout the Borough and our residents and businesses have great pride in living / working in Waltham Forest." The Associations support the identification of the Blackhorse Lane area as a growth area, and see the area itself, and specifically the former Webb's Industrial Site, as a sustainable opportunity for an intensification of residential land-uses to meet much needed housing requirements of the Borough, as identified within the Vision.	Support noted.
Mr Tim Brennan	Historic England	We welcome the identification in the consultation document of the potential for the historic environment to make a significant contribution to the future of the Borough, not least in the vision for Waltham Forest set out in section 6.	Comment noted.
Mr Tim Brennan	Historic England	There is relatively little indication that the Plan contains (or will contain in the next iteration) a positive strategy. Taking into account our comments in relation to the evidence base, we would encourage the Council to take a holistic approach to heritage issues and ensure they are considered wherever relevant across the scope of the Plan.	Comment noted regarding the need to ensure that a holistic approach is applied to ensure that heritage policies are well embedded within the plan. The new Local Plan will contain an appropriate strategy for managing heritage assets.
Mr Tim Brennan	Historic England	We welcome the inclusion of text on heritage assets as part of the vision for the Borough, and support the general aims of this section. As set out above, we would suggest that the vision would be strengthened by amending the text to reflect the inter-relationship between the historic environment and other policy areas to avoid any perception that it is a self-contained issue within the Plan. This could be achieved for example by including references to local character and context within bullet points 1, 2 and 5.	Comment noted regarding the need to ensure the vision statement is strengthened to reflect the inter-relationship between the historic environment and other policy areas.
Alice	Campaign to	Point (9) should more explicitly recognise the health and therapeutic	Suggested change is noted for consideration.

Consultee Name	Organisation	Comment	Council (Officers) Response
Roberts	Protect Rural England (CPRE)	value of being outdoors especially in parks and nature i.e. add in words 'for sport and active leisure and opportunities for therapeutic activity for physical and mental health'	
Young & Co. Ltd		We are in full support of the Council's vision which encourages the delivery of: Good quality homes; Well managed growth, particularly in the growth areas/hubs; and Growth in the local economy including for creative industries. In our opinion these aspects of the New Local Plan are sound in terms of consistency with national policy, particularly sustainable development.	Support noted.
Mrs Claire McLean	Canal & River Trust	There is no mention of sustainable transport here, which should be a key element. We also consider that the preserving of green and blue spaces should be included. We note that the diagram mentions low carbon/electric vehicles, but this should also refer to the reduction in powered vehicle traffic, and an increase in sustainable travel, such as walking and cycling. The section 'sustainable' should also refer to sustainable transport, energy use, and conservation.	These points are noted for consideration – in preparing the Local Plan there will be a section on sustainable transport.
Mrs Claire McLean	Canal & River Trust	We support point 9 – about a well maintained network of green spaces with high biodiversity value, providing facilities for sport and active leisure. We support the improvement and enhanced access to the borough's network of green spaces. The Trust intends to improve the towpath for cycling and walking, as a 'Quietway' (with TfL) or with alternative funding such as S106 or LIP. The Lee Navigation should be considered an integral part of the borough's green spaces network. Development aspirations in terms of housing and employment will need better transport provision and less reliance on it, requiring better provision of walking and cycling facilities. Bullet points 7, 8, 9 and 10 should explicitly refer to the sustainable transport provision to support this.	Support noted, together with the comments made about the improvement of the boroughs green spaces, the role of the 'Lee navigation' and the need to reference sustainable transport more clearly. This will be taken up in ongoing evidence base studies.
Transport for London		TfL supports the Council's vision and particularly the aspirations for well managed growth and provision of new, good quality homes in safe, liveable, attractive and well-maintained neighbourhoods. We	Comment noted regarding the need to clarify the identified growth areas / hubs, including all stations, town centres and other locations with good cycling,

Consultee Name	Organisation	Comment	Council (Officers) Response
		<p>suggest that the Plan should clarify that the identified growth areas / hubs referred to in No. 2 should include all stations, town centres and other locations with good cycling, walking and public transport accessibility (both existing and planned). These are the most accessible / sustainable locations for higher density housing-led growth. This approach accords with a number of key Draft London Plan policies, including D6 (Optimising Housing Density), D8 (Tall Buildings) and H1 (Increasing Housing Supply). Please also see our comments in respect of Chapter 17 below.</p>	<p>walking and public transport accessibility (both existing and planned).</p>
<p>Keira Murphy</p>	<p>Environment Agency</p>	<p>Although the vision identifies having a well maintained network of green spaces with high biodiversity value and essential infrastructure to support Good Growth (which we support), we think there is a lack of representation for the natural environment in Waltham Forest in this vision. If the ambition is that everybody enjoys a quality life, an enhanced natural environment that provides safety from flood risk, restores rivers to more natural conditions, provides clean water and healthy air are going to make a significant contribution in providing that quality of life. The network of green spaces which is highly valued in Waltham Forest provides multiple benefits as well as biodiversity and access to open space; it provides climate change resilience, drainage attenuation and air quality benefits. We would like to see the vision amended to celebrate the natural environment in Waltham Forest, recognising the multiple benefits it has and aim to protect and enhance it for the benefit of people and wildlife.</p>	<p>Comment noted regarding the lack of representation for the natural environment in Waltham Forest in this vision – for consideration in preparing the Local Plan vision.</p>
<p>Aviva Investors</p>		<p>As set out in earlier representations on Lea Valley Eastside Vision AAP our client fully supports the objectives and vision for the redevelopment of Leyton. Our client fully supports the inclusion of Leyton Mills within the vision, the principle of introducing new land uses and the better linking of the site with the High Road. It welcomes the inclusion of Leyton Mills as an area for potential redevelopment together with the Council 's aspirations to see an improvement in the</p>	<p>Support noted.</p>

Consultee Name	Organisation	Comment	Council (Officers) Response
		relationship between the site, the High Road and the train station to improve linkages and the visual appearance of the area.	
		DECENT HOMES FOR EVERYONE	
Ms Lucy Harrison		The current plans only seem to be poorly designed tower blocks which will ruin the landscape of the borough. I do not think that there has been enough social housing or genuinely affordable rented homes, or houses rather than small flats.	This point is noted for consideration – in preparing the new Local Plan housing policies.
Ms Lucy Harrison		I feel that a balance should be arrived at where not all new developments are high rise expensive flats. We are in danger of losing some things that are good about the borough.	This point is noted for consideration – in preparing the new Local Plan housing policies.
Ms Emma Best		Not enough attention paid to protecting vulnerable residents like the elderly or homeless. As the local plan develops I believe more emphasis should be put on this.	This point is noted for consideration – in preparing the new Local Plan housing policies.
Ms Celia Smith		I generally support the number of new homes being proposed however: - I would not support any development which uses commercial factors as a reason not to include the recommended social housing provisions.	This point is noted for consideration – in preparing the new Local Plan housing policies.
Dr Helen Stedeford		The Council needs to give serious consideration to the problem of defining affordability in relation to market rates. 80% of market rates for rent is not affordable for the majority of people. I'm on a good income and since living in London for the past 10 years my accommodation costs have never been less than 30% of my take home pay. For those on less money, even with 2 earners, many people are spending 50% of their income on keeping a roof over their heads. This is not sustainable. In 10 years' time there will be a massive problem with families being shunted around from one temporary residence to another. This is already an issue and causes a lot of problems in healthcare- how can GPs and hospitals provide any kind of continuity of care if patients are always moving address ie. never getting appointment letters, always having to change GP? Add to this disruption in staying at the same school/job if you keep moving;	This point is noted for consideration – in preparing the new Local Plan affordable housing policy

Consultee Name	Organisation	Comment	Council (Officers) Response
		<p>insecure accommodation leads to so many other problems. It is only going to get worse if nothing changes, and the council's bill for emergency B&B accommodation is going to sky rocket, while increasing numbers of single adults will become street homeless. The council needs to ring fence the majority of its 'affordable' accommodation as genuinely affordable by using average local income to set prices eg. Using London Living Rent and community land trust schemes, as well as providing more social housing.</p>	
<p>Aviva Investors</p>		<p>New London Plan Policy E7 'Intensification, co-location and substitution of land for industry, logistics and services 'encourages consideration to be given to whether certain logistics, industrial and related functions on employment sites could be intensified. Such intensification should facilitate the consolidation of the identified employment sites to support the delivery of residential and other uses through co-location. This opportunity should be reflected in the housing policy directions for maximising opportunities to increase the supply of new homes (and still support employment growth).</p>	<p>This point is noted for consideration – in preparing the new Local Plan housing policies.</p>
<p>Ms Abigail Woodman</p>		<p>Many residents are opposed to tower blocks in the borough because they are fundamentally changing what so many of us value: the low-rise Victorian and Edwardian neighbourhoods of family houses. To some extent, concentrating blocks of flats around transport hubs makes sense, theoretically reducing carbon emissions by reducing car ownership and “ if built to high environmental standards “ limiting water, electricity and gas usage through shared services. However, it is the height of these tower blocks that is causing so much anxiety. While a building of five or six storeys can, if well designed, blend into its surroundings, a 27 storey block is nothing more than a priapic reminder that local people have very little say in what happens to the places they call home. I also question whether developers after a quick buck are thinking about the long-term environmental sustainability of the homes they are building and I am saddened that,</p>	<p>This point is noted for consideration – in preparing the new Local Plan housing policies. The Characterisation and Intensification Study will inform policy development on how best to manage growth and change in local areas.</p>

Consultee Name	Organisation	Comment	Council (Officers) Response
		to date, the Council does not seem to have set high standards and insisted that developers making money out of our home meet these standards. If, as many suspect, the drive to build expensive homes in the borough is the Council's attempt to increase its revenue by increasing the number of people paying Council Tax, then let's be honest about this. Let's not pretend we are place making when, in fact, we are selling off our future to fund essential services now.	
Ms Abigail Woodman		The plan seems to suggest that the development of 'affordable housing 'will help to ensure that all residents have 'a decent roof over their head '. I completely endorse the Council's desire to ensure that every resident in Waltham Forest has a safe and secure place to live, but selling off Council-owned land to developers to build so-called 'affordable housing ' is not the answer. Developers consistently wriggle out of their commitments to the community. If Council-owned land is sold, it should only be sold for social housing; housing that people on the Council's housing list will be able to move into.	This point is noted for consideration – in preparing the new Local Plan housing policies.
Mr Adrian Stannard	Waltham Forest Civic Society	A well balanced community has to have a range of accommodation from one bed flats to large houses with gardens for children. Somehow underutilised house owners need to be encouraged to move to smaller accommodation with a solid guarantee if their house is sold it cannot be turned into flats. There needs to be a proper analysis (something the Planning system fails completely to do) of how many people can be properly housed in an area with adequate transport links, open spaces, local shops, schools and most importantly health care available when required. The current model of cramming as much in as possible is just creating misery for everyone. There is something completely unfair in providing for gypsy's and travellers who are not prepared to be part of a society and who ruin areas with their rubbish which the rest of the community have to pick up the cost for. The legislation giving them more rights than people from other communities should be rescinded.	This point is noted for consideration – in preparing the new Local Plan housing policies.

Consultee Name	Organisation	Comment	Council (Officers) Response
		In this day and age there is no room for groups who cannot conform to main stream society who pay the bills.	
Ms Ros Bedlow		Although the problem of poor quality homes is mentioned in the document, the solution appears to focus on building new homes. Realistically, most people in the borough will continue to live in existing properties, many of which date from the late 19th and early 20th centuries. Cold and damp homes impact on the physical and mental health of the occupants, as well as increasing their energy bills, placing some in fuel poverty. This is both a housing issue, and highly relevant to climate change resilience, as lack of insulation and inefficient heating systems lead to unnecessarily high carbon emissions. I would like to see the Council making the improvement of energy efficiency a priority in their plan	This point, in particular relating to energy efficiency measures in housing developments is noted for consideration – in preparing the new Local Plan.
Mr Philip Herlihy		Above all, as the 2008 "Sustainable Community Strategy" stated, Waltham Forest should be a place in which people aspire to live. If you allow pressure from developers to concentrate on "life-stage" homes, you'll be filling them with people who have one eye on their next move, and such people don't show the same interest in their community as those who do aspire to be here. What are needed are family homes, rather than yet more one-bed or two-bed flats. I happen to think that what are needed are not ever more homes in London but more jobs in the regions.	The need for family homes and jobs is noted – for consideration in preparing the new Local Plan.
Ms Alison Griffin		I would welcome recognition of the fact that 'Affordable housing' is an official/designated term and not what many local residents would experience or recognise as affordable to them. I would welcome a mention of the borough's efforts and aspirations to create as much more social / genuinely affordable housing as possible. Maybe this could also be more explicit in 5.1 (Affordability and quality of homes and/or elsewhere under the Challenges). And similarly in section 7.	Comment noted.
Mr Daniel Palman	Berkeley Homes (North East	We strongly support the Council's approach to the delivery of new housing to meet the target of 1,810 new homes per annum across the	Support noted.

Consultee Name	Organisation	Comment	Council (Officers) Response
	London) Ltd	plan period. We note this target is slightly above the housing target identified within the draft London Plan; however well below the target based on the proposed standardised OAN formula of 2,416 and the Council should explore options for seeking to achieve this. We support the Council in its aspiration to maximise the delivery of housing within the Borough and hope to play a key role in achieving and exceeding the target identified. The recognition that this approach requires intensive redevelopment of Brownfield land is a key element in sustainably delivering the vast number of new homes required in the Borough.	
Mr Daniel Palman	Berkeley Homes (North East London) Ltd	The Mayor of London within the draft London Plan has identified the need to move away from the mechanistic use of density as a planning tool to determine the acceptability of new developments and we would encourage the Council to adopt a similar approach, based on quality of design, effect on local context and accessibility.	This point is noted for consideration in preparing the new Local Plan.
Mr Daniel Palman	Berkeley Homes (North East London) Ltd	With the recent announcement of the increased new housing targets for London, the Council should take an active role in the identification and delivery of new strategic sites across the Borough. Waltham Forest is home to key public transport interchanges and locations and these are the areas identified by the Mayor of London as prime locations for the delivery of housing at higher densities to meet the new ambitious development targets. This includes the reopened Lea Bridge station which the GLA has earmarked as the catalyst for the regeneration of the Northern Olympic Fringe area.	The Council intends to carry out a Growth Capacity Study to identify suitable housing sites/areas to accommodate growth.
Mr Daniel Palman	Berkeley Homes (North East London) Ltd	We would encourage the Council to recognise the importance of high density, high quality development within Opportunity Areas, regeneration areas and housing zones to contribute to the delivery of new homes in the Borough. The intensification of development in these areas should be a priority especially when associated with	This point noted for consideration in preparing the new Local Plan. In addition to the growth capacity Study as mentioned above, the Council also intends to carry out a Characterisation and Intensification Study.

Consultee Name	Organisation	Comment	Council (Officers) Response
		existing and proposed transport infrastructure.	
Mr Daniel Palman	Berkeley Homes (North East London) Ltd	We would also encourage the Council to consider the key role residential development plays within mixed-use schemes as a delivery vehicle for other uses. The Council has set a requirement of circa 60,000 sqm of new employment floor space within the Borough and with suitable land at a premium it is clear that new housing and employment space will need to be delivered on these sites at higher densities to ensure the relevant targets are met.	This point is noted for consideration in preparing the new Local Plan.
Mr Daniel Palman	Berkeley Homes (North East London) Ltd	Finally, we support the Council on the delivery of affordable housing within the Borough. The Council's own evidence points towards a clear need for new affordable housing for residents within the Borough, and we recognise the need to deliver the new homes. In doing so the Council should seek to ensure any future affordable housing policy seeks continuity with current strategic guidance. We have set out our detailed comments on this approach within our representations on the Council's draft Affordable Housing and Viability SPD. We suggest that the Borough should follow the guidance set out in the published Mayor's Affordable Housing and Viability SPG (August 2017). This approach is further reinforced by the new draft London Plan.	This point is noted for consideration in preparing the new Local Plan.
Mr Daniel Palman	Berkeley Homes (North East London) Ltd	We would encourage the Council to adopt the approach set out in the draft London Plan policy H7 on affordable tenures within the emerging Local Plan. The Council's current policy seeks a tenure mix of 60% rented and 40% intermediate housing and we consider this tenure split should be revised in the Local Plan to reflect the Mayor's wording in the draft London Plan. Policy H7 seeks 30% rented (LAR preferred), 30% intermediate and 40% to be set by the Council. This provides flexibility for schemes which may be delivering a revised tenure mix but are delivering wider public benefits to utilise the 'Fast Track route'. A flexible approach to mix which responds to the diversity of housing need within the Borough is important to the	This point is noted for consideration in preparing the new Local Plan housing policies.

Consultee Name	Organisation	Comment	Council (Officers) Response
		delivery of new mixed and balanced communities; reducing viability discussions as a barrier to the early delivery of development.	
Catalyst Housing & swan housing asc	Catalyst Housing & Swan Housing Association	The Associations are committed to the delivery of housing across London and the London Borough of Waltham Forest, and specifically the delivery of a sustainable level of residential-led development at the former Webb's Industrial Site. The redevelopment of the site will include a mix of unit sizes and deliver much needed of affordable housing.	This point is noted.
Mr Matthew Fletcher	Metropolitan Police Service	It has been noted that there are still 4,384 units that are currently in the planning and development stage for Waltham Forest to meet its target of 12,000 new homes by 2020 (Pg 18). A conservative estimate would suggest that this is housing for approximately between 9,000 to 15,000 people in the next 3 years. As the population is expected to have grown by a further 24% by 2033 (Pg 30), it is also likely that the requirement for further housing will continue to grow and there will be increasingly more high-density builds provided for residents. As per Appendix 2, Waltham Forest has seen an increase in crime over the last 2 years and this is only likely to increase with the population growth. There are also concerns that at present "Waltham Forest is considered a highly deprived area under the National Index of Deprivation. On three of the seven indicators (crime, barriers to housing and services, and living environment) the Borough is amongst the 10% most deprived in the nation, the Borough's overall status is 35th out of 326 local authorities nationally." (Pg 36). The Borough has also been providing a high level of Affordable Housing (averaging 47% over the last 3 years - Pg18). It is imperative therefore that security is an important part of the design as there is credible evidence to support a link of deprivation and affordable housing to higher levels of crime.	The point made about the potential for higher levels of crime associated with deprivation and affordable housing is noted. The new Local Plan will include policies to deliver well-designed and safe places.
Mr Tim Brennan	Historic England	The policy framework dealing with issues such as housing and infrastructure would benefit from introducing the concept of the	This point is noted for consideration in preparing the new Local Plan.

Consultee Name	Organisation	Comment	Council (Officers) Response
		historic environment as part of relevant considerations for future decisions. This type of approach would be a proactive method of delivering the NPPF's requirement for a positive strategy.	
Mr Tim Brennan	Historic England	We support the policy directions under consideration, although as noted above we consider that these are very broad in nature. However, we recommend that reference is included to high quality design in new housing and the need for development to respond to existing local character and work successfully with the historic and existing built environment.	This point is noted for consideration in preparing the new Local Plan.
Ewan Coke	LB Redbridge	Redbridge supports the policy direction of providing decent homes for everyone and recognise the importance of delivering enough good quality homes across the borough, and providing both private and affordable housing through a range of tenures. We also support the need to build larger family homes as well as smaller units, which accords with our own approach to housing provision, based on the findings of the Northeast London SHMA which Redbridge shares with Waltham Forest.	Support noted.
Alice Roberts	Campaign to Protect Rural England (CPRE)	It is vital that affordability is more clearly defined in this plan. There is a huge range of options which now come under what is sometimes called the 'affordability umbrella'. Unless it is clear which bracket of affordability is needed, the plan will not deliver what is needed. (housing p39)	This point is noted for consideration in preparing the new Local Plan affordable housing policy.
McCarthy & Stone		We commend the council for considering the needs of Waltham Forest's ageing population within the Local Plan Direction of Travel document. We agree with policy direction 3: 'Encouraging a range of housing including sheltered housing, residential and nursing care homes; student housing, modular housing, community-led housing, self-build, custom build housing models, and Build to Rent.' [2]	Support noted.
Rentplus UK Ltd		With need for affordable housing accounting for 69% of the overall housing need there is a clear and pressing requirement for the Plan to deliver even greater numbers than before.	This point is noted for consideration in preparing the new Local Plan.

Consultee Name	Organisation	Comment	Council (Officers) Response
Rentplus UK Ltd		We support the policy direction seeking a greater supply of affordable housing. Flexible planning policies encourage developers to bring forward housing developments that properly reflect local housing needs and aspirations. As with our comments on the draft Affordable Housing SPD, successive Government consultations and announcements indicate that policy needs to ensure that developments respond to changing needs, including difficulties in accessing housing to purchase.	This point is noted for consideration in preparing the new Local Plan.
Rentplus UK Ltd		We strongly encourage the Council to adopt progressive and ambitious planning policies that support the delivery of a wide range of affordable housing tenures, including affordable rent to buy, to assist even greater numbers of people into homes they can afford and aspire to own.	This point is noted for consideration in preparing the new Local Plan.
Young & Co. Ltd.		We can confirm our agreement with Part 1 of the policy direction which seeks to maximise opportunities to increase the supply of additional homes including looking at the redevelopment of brownfield land. However, in our opinion in order that the emerging Plan meets the tests of soundness and is positively prepared (in that it is based on a strategy which seeks to meet objectively assessed development requirements) and justified (in that the most appropriate strategy is considered against reasonable alternatives) we recommend that the emerging Plan must include a review of Strategic Industrial Land (SIL) as part of any brownfield land review. This observation is made with specific reference to our land holdings which currently fall within a SIL designation. In our opinion, were the Council to consider the de-designation of SIL our site should be afforded priority, for a number of reasons: The site is already located in close proximity to existing residential dwellings, suggesting that the redevelopment of the site to include residential use would be suitable; The site is located in an area where new residential development (for example by Hill Development to the south east of	The Council intends to carry out a Growth Capacity Study to identify suitable housing sites/areas to accommodate growth. An Employment Land Study is being commissioned.

Consultee Name	Organisation	Comment	Council (Officers) Response
		our site) is being delivered; and The site is located in close proximity to excellent public transport connections which suggests that a sustainable form of development could be achieved in response to the Council's strategic policy objectives.	
Ms Gillian Morgan	Capital Growth	We would welcome policies which identify the opportunity to create innovative spaces for growing food, including green roofs, when considering applications for new developments and ensure the construction of structurally suitable green roofs for food growing that can accommodate both growing beds and greenhouses. Use planning conditions or Section 106 agreements to secure space for food growing in new development as part of the essential infrastructure required for that development. Request landscape plans demonstrate the potential use of any open space for community food growing. Ensure the design and layout of open space in new development is flexible so that spaces may be adapted for growing opportunities in the future. Integrate community food growing spaces, productive trees and plants in any landscaping proposal as part of a cohesive design of the development "" recognising that these are good for wildlife and people. Include maintenance plans as part of an application to ensure spaces will be managed successfully.	This point is noted for consideration in preparing the new Local Plan.
Mrs Juliemma McLoughlin	Greater London Authority	The draft new London Plan sets out how London's housing need can be met within its boundaries. This will require all those involved in housing delivery to work together. The draft new London Plan sets Waltham Forest a 10-year net housing completions target of 17,940 units (1,794 per annum) which is significantly higher than its existing target of 862 per annum. Of this revised target, 8,890 completions should be identified from small sites.	This point is noted in preparing the new Local Plan.
Mrs Juliemma McLoughlin	Greater London Authority	Table 4.3 in the draft new London Plan sets out the 2017 London SHMA findings: This shows a significant need for low-cost rental housing and 1-bedroomed flats, which should be reflected in local plans. Emerging Policy H7 Affordable housing tenure requires	This point is noted for consideration in preparing the new Local Plan.

Consultee Name	Organisation	Comment	Council (Officers) Response
		boroughs to split affordable products as follows: Minimum 30% low-cost rented homes - Minimum 30% intermediate products (including London Living Rent and London Shared Ownership) - 40% to be determined by identified local need (consistent with definition of affordable housing).	
Mrs Juliemma McLoughlin	Greater London Authority	Housing delivery In Waltham Forest has been increasing significantly in recent years, substantially exceeding its London Plan target in the last year by delivering 1,033 homes, up from 973 homes in 2015/16 (Net housing completions - DCLG). To sustain delivery, Waltham Forest's revised Local Plan should set out a clear strategy, allocating sufficient land and including proactive policies, taking into account the measures set out in draft new London Plan policies H1- Increasing housing supply and H2 - Small sites	This point is noted for consideration in preparing the new Local Plan.
Mrs Juliemma McLoughlin	Greater London Authority	Waltham Forest has been working with my officers on the London SHLAA, and Waltham Forest has a housing zone at Blackhorse Lane & Northern Olympic park which has the potential to deliver 2,608 homes, including 944 affordable homes and 4,954 jobs. However, as stated above, the draft new London Plan has a more restrictive approach to the release of industrial land and therefore this land use should be managed in line with draft Policies E5-E7 for industrial land.	This point is noted for consideration in preparing the new Local Plan.
Mrs Juliemma McLoughlin	Greater London Authority	To deliver the small sites target, Policy H2 Small sites states that boroughs should apply a presumption in favour of small housing developments from infill development on vacant or underused sites and for sites within PTALs 3-6 or within BOOM of a Tube station, rail station or town centre boundary promote residential conversions and extensions, including upward extensions, redevelopment and infill. The Mayor recommends Waltham Forest's Local Plan includes a positive approach to small sites to meet the requirement in emerging Policy H2 for boroughs to prepare area-wide design codes to promote good design and higher densities on small sites.	This point is noted for consideration in preparing the new Local Plan.
Mrs	Greater London	In order to optimise the type of housing delivered, draft new London	This point is noted for consideration in preparing the

Consultee Name	Organisation	Comment	Council (Officers) Response
Juliemma McLoughlin	Authority	Plan Policy H12 Housing size mix states that boroughs should not set policies or guidance that require set proportions of different-sized (in terms of number of bedrooms) market or intermediate units to be delivered, which are regarded as inflexible and are often not implemented effectively and generally do not reflect the optimum mix for a site. It is noted that Waltham Forest expects an additional 1.1 per cent of households which include children and a 4.7 per cent increase in residents over 65. This is in line with the findings of the London SHMA 2017 which shows the number of family households (i.e. not single people or Other) without dependent children is projected to grow more (45%) than those with dependent children (18%). Overall housing policies in Waltham Forest need to consider strategic London need as well as local need and the potential of new homes to be affordable to the intended occupants.	new Local Plan.
Mrs Juliemma McLoughlin	Greater London Authority	It is important that estate regeneration does not lead to the loss of affordable housing and that it delivers uplift in affordable housing where possible, with delivery of affordable housing being maximised. Draft new London Plan policy H10 Redevelopment of existing housing and estate regeneration requires existing affordable floorspace to be replaced on an equivalent basis i.e. where social rented floorspace is lost, it should be replaced by general needs rented accommodation with rents at levels based on that which has been lost. Estate regeneration should follow the Mayor's Good Practice Guide to Estate Regeneration.	This point is noted for consideration in preparing the new Local Plan.
Mrs Juliemma McLoughlin	Greater London Authority	Genuinely affordable housing is a priority for the Mayor and he strongly encourages Waltham Forest to adopt the affordable housing policies as set out in the draft new London Plan Policy - H5 Delivering affordable housing, Policy H6 Threshold approach to applications and Policy H7 Affordable housing tenure. He would have no objections to a policy seeking contributions from schemes of fewer than 10 dwellings.	This point is noted for consideration in preparing the new Local Plan.

Consultee Name	Organisation	Comment	Council (Officers) Response
Gordon Turpin	Highams Park Planning Group	In The Higham's Park Plan we have identified a number of potential sites for new and improved homes in the area especially through the redevelopment of the Aldriche Way Estate. Its replacement with low-medium rise terraced housing and mansion block apartments would probably double the number of units and restore safe, permeable streets, in mixed tenure, far less likely to breed gang violence.	Emerging proposals from the Highams Park Neighbourhood Plan will be considered in preparing new Local Plan.
Andrew Haughey	Capital & Regional	We note that the draft London Plan has been published, since the LBWF consultation document was prepared. As indicated in the LBWF consultation document, the proposed housing target for Waltham Forest has significantly increased, from 862 dpa to 1,794 dpa. The adopted Local Plan will need to respond to this change and ensure there is sufficient flexibility built into its policies to accommodate future changes to the housing requirement, both during preparation of the Local Plan and during the plan period. The consultation document lacks clarity regarding the current London Plan housing target, and how this compares to the LBWF target, as one is expressed as an annualised target, while the other is expressed as an overall target presumably for the previous plan period.	The Council notes the publication of the Draft London Plan since the preparation of the Direction of Travel document. Issues/policy matters raised by the London Plan will be considered in preparing the new Local Plan.
Transport for London		TfL CD supports the proposed policy directions and specifically: 1. maximising opportunities to increase the supply of new homes, 2. supporting and encouraging the delivery of affordable housing, 3. encouraging a range of housing and 4. Supporting a mixture of housing tenures.	Support noted.
Transport for London		The Council has objectively assessed a need for 1,810 new homes in the borough. For clarity, this should be expressed as the annual need. This will translate into a challenging housing target which may exceed the one set out in the Draft London Plan.	This point is noted in preparing the new Local Plan.
Transport for London		In order to maximise housing delivery, the borough will need to identify new sources of supply, including colocation of housing with other uses such as transport infrastructure and business / commercial activities. It will also be necessary for the Plan to include policies to	This point is noted in preparing new Local Plan.

Consultee Name	Organisation	Comment	Council (Officers) Response
		<p>maximise density in accessible, sustainable locations such as at transport hubs and town centres (including tall buildings). This would accord with the Draft London Plan 's approach to increasing housing supply (eg. policies D6 (Optimising Housing Density), D8 (Tall Buildings), H1 (Increasing Housing Supply), H2 (Small Sites) and E7 (Intensification, Colocation etc)).</p>	
Transport for London		<p>The Plan should also identify opportunities for the 'meanwhile' use of sites for housing, to make efficient use of land while it is awaiting longer-term development. TfL intends to be an effective partner for the borough by delivering housing on our land at a scale and density which optimises the potential of each site and at exemplary standards of design. Predominantly, this will be permanent housing development; however, there may be opportunities for 'meanwhile ' use on appropriate TfL sites which are longer-term development opportunities. The Plan should seek to deliver affordable housing and a range of tenures in accordance with the Mayor 's Homes for London SPG (2016) and the Draft London Plan (2017).</p>	This point is noted in preparing the new Local Plan.
Aviva Investors		<p>In terms of policy directions, our Client supports the further consideration of maximising opportunities to increase the supply of additional homes in the Borough, including redevelopment of brownfield land in order to ensure that the Borough's housing needs are met. We note that the Council's own objectively assessed housing need assessment indicates that 1,810 new dwellings are required. However, the consultation document does not appear to state what period this relates to. As set out above, the Local Plan should clearly express housing targets by providing annualised figures, so these can more readily be compared where different plan periods are involved. Additionally, we note that the affordable housing need is stated as 69%, based on the overall target of 1,810 dwellings. For clarity, the next consultation draft should provide the target affordable housing requirement, expressed as a percentage of both the OAHN figure and</p>	This point is noted in preparing the new Local Plan. The draft Local Plan will contain information on affordable housing targets/requirements.

Consultee Name	Organisation	Comment	Council (Officers) Response
		emerging London Plan target.	
Andrew Haughey	Capital & Regional	In terms of policy directions, our Client supports the further consideration of maximising opportunities to increase the supply of additional homes in the Borough, including redevelopment of brownfield land in order to ensure that the Borough's housing needs are met. We note that the Council's own objectively assessed housing need assessment indicates that 1,810 new dwellings are required. However, the consultation document does not appear to state what period this relates to. As set out above, the Local Plan should clearly express housing targets by providing annualised figures, so these can more readily be compared where different plan periods are involved. Additionally, we note that the affordable housing need is stated as 69%, based on the overall target of 1,810 dwellings. For clarity, the next consultation draft should provide the target affordable housing requirement, expressed as a percentage of both the OAHN figure and emerging London Plan target.	This point is noted in preparing the new Local Plan. The draft Local Plan will contain information on affordable housing targets/requirements.
Aviva Investors		Page 38 of the consultation document notes that LBWF are also consulting on what should be contained in the new Housing Strategy. It is unclear whether this is a separate consultation document, which is yet to be released, or whether this has been incorporated into the Regulation 18 consultation.	The Housing Strategy work is a separate consultation. When adopted this will also inform the new Local Plan.
Andrew Haughey		Page 38 of the consultation document notes that LBWF are also consulting on what should be contained in the new Housing Strategy. It is unclear whether this is a separate consultation document, which is yet to be released, or whether this has been incorporated into the Regulation 18 consultation.	The Housing Strategy work is a separate consultation. When adopted this will also inform the new Local Plan.
Mrs Juliemma McLoughlin	Greater London Authority	The draft new London Plan contains a new, dedicated specialist older person policy (HI 5). As outlined above, the draft London Plan re-enforces that older persons housing, including sheltered accommodation and extra care accommodation falls within Use Class C3 and therefore is subject to the affordable, accessible and inclusive	This point is noted in preparing the new Local Plan.

Consultee Name	Organisation	Comment	Council (Officers) Response
		design housing policies. Annual borough benchmarks for specialist older persons (C3) is provided in Table 4.4 of the draft London Plan Waltham Forest's benchmark is 110 units per annum, a slight increase on the current benchmark of 90 units per annum.	
Mrs Juliemma McLoughlin	Greater London Authority	Student accommodation forms part of the overall housing need for London and purpose-built student accommodation (PBSA) therefore contributes to meeting London's housing need. Strategic need for PBSA is not broken down into borough-level targets; however boroughs should ensure that local and strategic need for PBSA is addressed.	This point is noted in preparing the new Local Plan – in particular the need to ensure that local and strategic need for PBSA is addressed.
Andrew Haughey	Capital & Regional	In terms of policy directions, our Client supports the further consideration of maximising opportunities to increase the supply of additional homes in the Borough, including redevelopment of brownfield land in order to ensure that the Borough's housing needs are met.	Support noted.
Mrs Juliemma McLoughlin	Greater London Authority	The draft new London Plan Policy H17 Purpose-built student accommodation seeks at least 35% of purpose-built student accommodation to be secured as affordable. The rental cost for affordable student accommodation has been defined through the work of the Mayor's Academic Forum.	This point is noted in preparing the new Local Plan
Mrs Juliemma McLoughlin	Greater London Authority	The Mayor will expect specialist older persons housing (sheltered accommodation and extra care accommodation), which falls within Use Class O, to provide affordable housing in line with affordable housing policies (H5 Delivering affordable housing and H6 Threshold approach to applications). However, the tenure split requirements for specialist older person accommodation may differ from those set out in Policy H7 Affordable housing tenure. Where this is proposed, it should be set out in Development Plan Documents or supplementary guidance.	This point is noted in preparing the new Local Plan
Natalie Szarek	The Community Food Growers	Communal food growing spaces in housing developments can have a significant positive impact on community cohesion and health. Policy	This point is noted for consideration in the new Local Plan.

Consultee Name	Organisation	Comment	Council (Officers) Response
	Network	Proposal: Integration of food growing space to be a requirement in all new housing developments with utilisation of green roof methods and potential for training and enterprise opportunities.	
		BUILDING A RESILIENT ECONOMY	
Mr. Gordon Turpin		Conversion of existing retail units in town centres to business use should be done in such a way that it does not allow subsequent conversion to housing through permitted development rights	This point is noted for consideration in the new Local Plan.
Mr Bob Sharples	Sport England	Please see previous comments regarding sport and employment/economic benefits.	This point is noted for consideration in the new Local Plan.
Ms Abigail Woodman		The Council must also acknowledge that the drive for efficiency through technology disadvantages those in the community that cannot or will not use computers. Many prefer to talk to a real person who can sympathise and advise them on what to do next when they have a problem. Emails often go unanswered and, when you log an issue through the council's portal, you are not sent the text you entered, just a computer generated reference number, so you cannot follow up on an issue that is not dealt with because you do not have a written record of the complaint you made. The council says that it wants to create jobs; perhaps fully trained staff able to liaise with residents to resolve problems is a good place to start.	This point is noted.
Aviva Investors		New London Plan Policy E7 'Intensification, co-location and substitution of land for industry, logistics and services encourages consideration to be given to whether certain logistics, industrial and related functions on employment sites could be intensified. The policy states that such intensification should facilitate the consolidation of the identified employment sites to support the delivery of residential and other uses through co-location. This opportunity should be reflected in the economy policy directions for maximising opportunities to support employment growth whilst increasing the supply of new homes.	This point is noted for consideration in the new Local Plan.
Mr Adrian	Planning Watch	Employers need to be encouraged to the area so that people don't	This point is noted for consideration in the new Local

Consultee Name	Organisation	Comment	Council (Officers) Response
Stannard	Convenor Civic Society	have to travel to the jobs. It does not make for a well-balanced society if all the homes are away from the jobs and the majority have to leave the area during the day. The council has to make it clear which areas are for employment and use suitable policies to attract employers. As travel becomes more difficult and expensive jobs have to be created near homes. In particular online work can be carried out from home with no travelling.	Plan. The new policy approach will be to increase job provision locally to minimise travel and to ensure that the borough that there is a good balance between the planning objective to increase housing and employment provision.
Mr Daniel Palman	Berkeley Homes (North East London) Ltd	We support the Council's approach to improve and increase the provision of jobs within the Borough. However, we are concerned that Policy Direction 1 and Policy Direction 3 may contradict each other. The Council's aspiration for the protection of existing commercial floorspace could impact on the ability to "Ensure efficient use of land by densifying and intensifying new and existing employment uses and jobs". The wholesale protection of low density employment generating uses could significantly impact on the ability for development sites to come forward in the future. The protection of floorspace harms the opportunity for genuine place-making as the provision of an excessive amount of low density employment uses (and the areas for servicing and yard space required for these uses) having a detrimental impact on the quality of public realm and character of areas. Such uses are not always conducive to mixed-use areas and are obstacles in the delivery of new development.	This point is noted for consideration in the new Local Plan.
Mr Daniel Palman	Berkeley Homes (North East London) Ltd	In our view, the emphasis should be on creating jobs, building businesses and creating opportunities as outlined in paragraph 161 of the NPPF. This could be achieved through a variety of employment spaces such as those set out within paragraph 20 of the document. The provision of employment floorspace within redevelopment schemes should thus be based on a holistic approach that does not just rely on a quantitative re-provision of gross internal floor area from previous buildings, but rather assesses the type and density of the employment uses to be provided. It should also consider how	This point is noted for consideration in the new Local Plan.

Consultee Name	Organisation	Comment	Council (Officers) Response
		these meet local demand for new flexible employment opportunities, and how they can increase the numbers of jobs.	
Mr Daniel Palman	Berkeley Homes (North East London) Ltd	We support the delivery of new space for small and medium enterprises (SME's), and the Boroughs desire to enhance the diversity of employment space it provides for businesses. This approach is consistent with Policy E2 of the draft London Plan, and is identified as a key aspect for the delivery of new affordable workspace. Given the overarching desire within the emerging Local Plan to deliver new affordable workspace across the Borough, we would strongly encourage the Council to adopt a flexible approach based on the retention, and delivery of additional jobs in varying typologies of workspace within future employment policies.	This point is noted for consideration in the new Local Plan.
Mr Daniel Palman	Berkeley Homes (North East London) Ltd	The Mayor of London within draft London Plan Policies GG2 and E7 states that in order create high density, mixed-use places that make the best use of land; development should seek to promote the co-location of residential and other employment space that increase the density of homes and jobs provided. The Mayor sets out within figure 6.3 a number of simplified approaches to the delivery of these spaces designed to provide communities with a range of services. The Council should consider adopting a similar approach within the Borough, especially within Opportunity Areas and areas of high public transport accessibility.	This point is noted for consideration in the new Local Plan.
Mr Tim Brennan	Historic England	Heritage is now well understood as an important driver for the economy, not least in tourism terms "" see https://content.historicengland.org.uk/content/heritage-counts/pub/2017/heritage-and-the-economy-2017.pdf . We note and welcome the references elsewhere in the consultation document in relation to the Council's aspirations for the cultural offer of the Borough "" this could be further strengthened by making reference to heritage-led tourism in section 8	This point is noted for consideration in the new Local Plan, in particular relating to the reference to heritage-led tourism.
Ewan Coke	LB Redbridge	We recognise that safeguarding employment and training	Support noted.

Consultee Name	Organisation	Comment	Council (Officers) Response
		opportunities and supporting economic development is an important, key objective in building a resilient economy and one which again, may benefit residents in neighbouring boroughs that work in Waltham Forest. We also support the policy direction to grow established enterprises and encourage new businesses in new sectors, and the objective of creating an additional 57,000sqm of additional employment floor space up to 2030.	
HHGL Ltd		My clients would request that the first draft of the Local Plan include a specific policy and/or supporting text to recognise and confirm the following: The important contribution that the Homebase made and the converted Bunnings Warehouse will continue to make to the comparison offer of Wood Street Town Centre in both complementing that Centre and offering the opportunity for linked trips , The importance of Homebase as a source of a large number of local jobs, a value that will be enhanced through the reopening of the store as a Bunnings Warehouse in January 2018. The need to protect the stores ' retail and employment role given the lack of alternative sites for this form of large format retail use within the Borough.	This point is noted for consideration in preparing the new Local Plan.
Young & Co. Ltd.		In response to Question 1, we are in support of the Council's policy objective 3 which seeks to ensure the efficient use of land by densifying and intensifying new and existing employment uses and jobs, including a review of how employment uses can be layered with other uses. However, in response to Question 2, we do not agree with objective 1, which suggests that all employment floorspace should be retained. In our opinion, this objective as drafted is at odds with objective 3 and would render any emerging Plan unsound as the Plan would not have been positively prepared. For example, the densification of employment floorspace could result in a reduction in employment floorspace yet yield an increase in jobs. To ensure the emerging Plan is sound, we strongly recommend that the policies clearly define the circumstances where existing floorspace quantum	This point is noted for consideration in preparing the new Local Plan.

Consultee Name	Organisation	Comment	Council (Officers) Response
		should be protected and where a quantitative reduction in floorspace would be accepted if employment density (jobs) would increase.	
Ms Gillian Morgan	Capital growth	We would welcome policies which encourage start-up food businesses.	This point is noted for consideration in preparing the new Local Plan.
Transport for London		TfL CD generally agrees with the proposed policy directions. No. 3 would promote densification and intensification of existing employment uses and jobs. We consider this to be key to enabling London's growth in sustainable locations. As stated above, this should include colocation of housing with other uses such as transport infrastructure and business / commercial activities.	This point is noted for consideration in preparing the new Local Plan.
Mrs Juliemma McLoughlin	Greater London Authority	Emerging Policies EI to EII in the draft new London Plan cover the economy, employment and industry. Draft policy EI Offices notes that there will be growth in office space in outer London but it is anticipated to be focused in selected locations, especially in west and south London. No locations are identified in Waltham Forest. A new policy has been included to promote the availability of lower cost (market) workspace and in certain circumstances, affordable (subsidised) workspace.	This point is noted for consideration in preparing the new Local Plan.
Mrs Juliemma McLoughlin	Greater London Authority	A further change in approach of the draft new London Plan is promoting the intensification of industrial activities and where appropriate (in line with emerging policy E7), co-location with residential development. Due to the much greater release of industrial land than that stipulated in the London Plan monitoring benchmarks, the draft new London Plan takes a more restrictive approach to the loss of designated industrial areas. Waltham Forest is categorised as a borough that is required to retain its industrial capacity. The borough has two areas of Strategic Industrial Locations at Blackhorse Lane and Lea Bridge Road.	This point is noted for consideration in preparing the new Local Plan.
Natalie Szarek	The Community Food Growers Network	With the rise of the local food economy in Waltham Forest, it is crucial that the Local Plan asserts the importance of access to land for food growing and space to support food growing businesses (ie for packing,	This point is noted. However this is a procurement issue, which does not strictly fall within the remit of the Local Plan.

Consultee Name	Organisation	Comment	Council (Officers) Response
		distribution, back office work). Furthermore, enlightened procurement practices in the Local Council could significantly boost the local economy and support local businesses. Policy Proposal: Waltham Forest Council to independently purchase at least 15% of their total supply of foodstuffs from small-scale, non-chemical producers located in and around London by 2020, 25% by 2030 and 30% by 2036 "" to increase demand for short supply chain and build sustainable local economies.	
Natalie Szarek	The Community Food Growers Network	Food growing and food production should be considered as a priority use for public land that is underused or vacant, particularly where not suitable for housing, on a long term basis under the Community Right to Reclaim Land, (Localism Act 2011), or where not possible then temporarily (meanwhile use)	This point is noted for consideration in preparing the new Local Plan. There are competing uses for public land, which clearly will require careful consideration in establishing priorities.
		PROVIDING INFRASTRUCTURE	
Ms Lucy Harrison		Please consider how much pedestrian access and public transport is really being improved. I feel that these aspects have been made worse by recent changes on Lea Bridge Road.	This point is noted.
Mikko Rintala		Currently during the rush hour it can take 45-60 mins by bus from Walthamstow Central to Stratford. Easiest way is to take a lot of cars off the streets (and make buses faster) would be to reopen the train line from Walthamstow Central to Stratford (i.e. Hall Farm Curve). I really hope this could be done during the lifetime of this document. I know the council cannot decide such a thing, but please lobby TFL to reopen it!	This point is noted.
Mr Keith Pilling		I consider that travel by road in the borough is increasingly difficult and polluting since the introduction of cycle lanes and little Holland schemes, public transport by bus is less dependable and congestion of roads is far worse, Copenhagen crossings are a danger to those who are deaf or have sight impairments, cyclists continue to use pavements which is hazardous, roads should be opened for all vehicles and one-way systems reduced to main roads to ease the	This point is noted.

Consultee Name	Organisation	Comment	Council (Officers) Response
		situation, cpz's are a ready source of money for the borough but achieve little else of value, with a growing population better road and public transport travel must be a priority.	
Ms Celia Smith		Fly tipping across the Borough is a significant issue - it would be interesting to understand how in addition to physical waste sites, how the council proposes to police issues such as this, particularly in light of pressure on budgets etc.	This point is noted.
Mr Adrian Stannard	Planning Watch Convenor Civic Society	Transport improvements should mean more train lines cutting through the Borough but this will never happen. In which case the number of people living in an area should be dependent on the infrastructure that can be provided. Schools should be built with adequate play space and playing fields not like Bremer where a school was squeezed into a housing estate. The school should have had priority over the land available. Land for proper health facilities should take priority over housing. This also applies to utilities requirements and waste disposal sites. In other words proper town planning instead of the current "let anything be built" attitude. Walthamstow Town Centre and Lea Bridge Road being some of the worst examples.	This point is noted in preparing the new Local Plan.
Jeremy Dagley	Corporation of London	Finally, we look forward to seeing the IDP developed. In particular the IDP will need to integrate with the protection strategy for the Forest and work with neighbouring Boroughs and Districts as well as the London Mayor. Infrastructure needs to address pollution and climate change and should be sure to incorporate appropriate greening measures, including charging points for electric vehicles and solar power generation in new housing developments, to reduce the impact of population growth of the environment.	This point is noted in preparing the new Local Plan.
Joe Ward		The document is sound but has a gaping hole which relates to car parking and switches of transport modes. Glad that it recognises mini Holland and the Enjoy Waltham Forest Project. I attended the Planning Committee and objected to redevelop Ive Farm Sports Facility having a 41 spaces car park. Council Raynor said that this was	The Council notes the point made about car parking provision in development proposals. The new Local Plan will include a policy on car parking.

Consultee Name	Organisation	Comment	Council (Officers) Response
		<p>modest and it was voted through. If I understand things correctly 33 new car parking spaces off Selborne Road at the Mall, a very congested and critical air quality area. Then there is what used to be called the Pool and Track, OUR local London Borough Council gave itself permission for an additional 35 car parking spaces. Why??? I have a strong audit trail of zero car parking policy by the Council, all is "ad hoc". Given how transformational our transport modes are becoming, would it not be appropriate to include a paragraph about reducing car parking, underpinned by sustainable public transport such as the commendable reopening of Lea Bridge Station.</p>	
Thames Water Utilities Ltd		<p>New development should be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 156 of the National Planning Policy Framework (NPPF), March 2012, states: "Local planning authorities should set out strategic policies for the area in the Local Plan. This should include strategic policies to deliver the provision of infrastructure for water supply and wastewater.</p>	This point is noted in preparing the new Local Plan.
Mr Daniel Palman	Berkeley Homes (North East London) Ltd	<p>We strongly support the Council in their identification of key infrastructure requirements designed to facilitate sustainable growth within the Borough. We support the Council's recognition of the importance of digital infrastructure in helping to provide the basis for new businesses and technologies within the Borough.</p>	Support noted.
Mr Daniel Palman	Berkeley Homes (North East	<p>We note the Council's aspiration to deliver on site waste and utilities infrastructure. Whilst this approach is supported in providing more environmentally sustainable areas within the Borough; we would encourage the Council to build sufficient flexibility into any future policy to ensure that future developments are not curtailed by the challenges in implementing this infrastructure especially on complex sites and at the detriment of other priorities.</p>	This point is noted in preparing the new Local Plan.
Mr Tim Brennan	Historic England	<p>We support the policy directions under consideration. We would welcome the supporting text in this section making reference to the</p>	This point is noted in preparing the new Local Plan.

Consultee Name	Organisation	Comment	Council (Officers) Response
		potential impacts of new and upgrading of infrastructure on heritage assets, together with the need for careful consideration of such proposals and accompanying high quality of design.	
Ewan Coke	LB Redbridge	We support the policy direction towards provision of new or upgraded transport infrastructure. The development of new infrastructure to increase capacity and improve passenger experience is a policy direction we would be keen to discuss with Waltham Forest as part of your duty to cooperate, with a particular interest in any work undertaken with TfL to improve Central Line capacity. We welcome further working with you on this matter.	Support noted.
Alice Roberts	Campaign to Protect Rural England (CPRE)	The borough should ensure there is space for collection and bulking facilities to significantly increase recycling (while reducing residual household waste). The borough is wasting money if recycling rates are low because (a) it must pay for residual waste to be disposed of (b) it must deliver multiple collections services, both residual and recycling (ideally it would move to less frequent or fortnightly alternating collections to reduce costs). The local plan could be underpinned by a target to reduce costs through pushing for an ambitious target to reduce residual waste to make way for a much more efficient collection chain. Reducing residual waste is relatively simply achieved by restricting what can be placed in bins, using communications and enforcement procedures managed by operatives, and by restricting residual waste / ensuring recycling is easy.	This point is noted in preparing the new Local Plan.
Andrew Haughey	Capital & Regional	Our Client supports the continued promotion of Walthamstow as the major town centre in the Borough, and would welcome support and promotion by the Council of cafe, restaurant and evening economy uses in Walthamstow Town Centre. Our Client welcomes the Council's commitment to supporting and promoting retail, business, cultural, leisure and residential investment in Town Centres, and the desire to grow the evening economy to attract both residents and visitors to	This point is noted in preparing the new Local Plan.

Consultee Name	Organisation	Comment	Council (Officers) Response
		the Borough.	
Andrew Haughey	Capital & Regional	Page 31 notes that access to funding for infrastructure is challenging, and that the Council is working towards receiving maximum level of developer contributions possible. In this regard the Local Plan should make clear that the Council will not require developers to make up any shortfall for the delivery of statutory provisions, such as transport capacity upgrades or health provision, which are funded by other means i.e. taxation, travel fares etc. Additionally, the Local Plan should clearly set out the Council's priorities, to ensure that planning obligations, in particular relating to infrastructure and affordable housing provision are prioritised accordingly.	This point is noted in preparing the new Local Plan.
Thames Water Utilities Ltd		In general terms Thames Water supports the use of Sustainable Drainage Schemes in new development. SuDS not only help to mitigate flooding by controlling surface water through sustainable drainage systems, but over the lifetime of the development they can also help to: <ul style="list-style-type: none"> · improve water quality · provide opportunities for water efficiency · provide enhanced landscape and visual features · support wildlife · provide amenity and recreational benefits. Thames Water will seek to work with developers, the Council, the GLA and EA to ensure that SuDS opportunities are maximised, and those they are effectively adopted and maintained over their lifetime. For combined sewerage networks, by deploying strategic and local SuDS solution this will help to significantly reduce surface water runoff, potentially to Greenfield run off rates. If such a net reduction of surface water runoff can be achieved this will limit the number of combined sewer network upgrades required to accommodate development. As such Thames Water requests that the Council include a Policy which covers flood risk in both the Local Plan.	This point is noted in preparing the new Local Plan.
Thames Water Utilities Ltd		Paragraph 162 of the NPPF relates to infrastructure and states: " Local planning authorities should work with other authorities to assess the quality and capacity of infrastructure for water supply and	This point is noted in preparing the new Local Plan.

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		wastewater and its treatment . . . take account of the need for strategic infrastructure including nationally significant infrastructure within their areas." The new web based National Planning Practice Guidance (NPPG) published in March 2014 includes a section on 'water supply, wastewater and water quality ' and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that: "Adequate water and wastewater infrastructure is needed to support sustainable development" (Paragraph: 001, Reference ID: 34-001-20140306).	
Thames Water Utilities Ltd		Thames Water agree that both the Council and more importantly developers should work proactively with us to ensure capacity exists, and where it does not, that all infrastructure requirements and in place prior to development coming forward. We would therefore request that a specific policy on water and sewerage infrastructure is included within the new Local Plan. We have set out a suggested policy as follows: "PROPOSED POLICY - WATER AND SEWERAGE INFRASTRUCTURE CAPACITY: Planning permission will only be granted for developments which increase the demand for off-site service infrastructure where: 1. sufficient capacity already exists or 2. extra capacity can be provided in time to serve the development which will ensure that the environment and the amenity of local residents are not adversely affected. When there is a capacity constraint and improvements in off-site infrastructure are not programmed, the developer should set out how the infrastructure improvements will be completed prior to occupation of the development." It is also considered that text along the following lines should be added to the Local Plan to support the above proposed Policy: "PROPOSED NEW POLICY SUPPORTING TEXT: The Council will seek to ensure that there is adequate water supply, surface water, foul drainage and	This is noted in drafting the new Local Plan.
Mrs Claire	Area Planner	The Trust recommends that the Local Plan should take the	The points made have been noted in drafting the new

Consultee Name	Organisation	Comment	Council (Officers) Response
McLean	Canal & River Trust	<p>opportunity to seek to enhance the waterways and access to them to encourage walking and cycling, which accords with the strategic aims of the London Plan and guidance contained in the National Planning Policy Framework (NPPF) that "planning policies and decisions should address the connections between people and places and the integration of new development into the natural, built and historic environment" (paragraph 61). As well as promoting sustainable local transport, such enhancement can also encourage walking and cycling with a benefit to human health. The towpath in LB Waltham Forest is well used for walking and cycling, and we would welcome opportunities to seek improvements to these, and accesses to them, where possible, including through new waterside development. The waterway network as a specific, multi-functional form of infrastructure, and the Local Plan should acknowledge the Canal & River Trust as a key partner in this respect. In order to ensure that any impacts of development on the canal infrastructure are mitigated, for example where developments will result in significant increases in the use of the towpath as a sustainable transport link, it should be clearly stated that appropriate developer contributions towards improving the condition of the towpath or other waterway infrastructure will be sought.</p>	Local Plan.
Mrs Claire McLean	Area Planner Canal & River Trust	<p>Sustainable Travel and the Lee Navigation The Trust is keen to ensure that sustainable travel, health & wellbeing impacts, and the value of green/blue spaces is recognised through all sections of the Local Plan document, to be an intrinsic part of the overall ethos and vision for development in the borough. We would also like to see the Local Plan recognise the resource offered by the Lee Navigation to this aim (even though the waterway generally is on the boundary of the borough) as it is still a valuable resource for the borough's residents, businesses, commuters, visitors and other stakeholders. We would also like to see reference to access routes to the Navigation in the wider sustainable</p>	The points made have been noted as part of the green infrastructure evidence base which will inform the Local Plan

Consultee Name	Organisation	Comment	Council (Officers) Response
		transport and development planning within the borough.	
Mrs Claire McLean	Area Planner Canal & River Trust	The Trust is working closely with TfL on a Lee Navigation Quietway proposal to improve walking and cycling in the Lee Valley. We would welcome S106 and CIL support from the borough and developers to deliver this, and to link in with local development and the cycling and walking network. We are discussing the potential for a 22km of Quietway route (or generally improving the towpath for walking and cycling) with TfL along the Lee Navigation between the Limehouse Cut and the M25 on the outskirts of Enfield. We will be discussing this further with LB Waltham Forest officers in January. This is an off-road route with an excellent healthy streets rating and significant strategic value, offering a quiet parkland and rural route, but linking both green and blue spaces and also key employment and residential areas. Improvements to the towpath as a Quietway would improve access to the green and blue spaces of the waterways, Lea Valley Regional Park, Queen Elizabeth Olympic Park, Three Mills Park, Victoria Park, Hackney Marshes, Walthamstow Wetlands, Springfield Park, William Girling and King George 's reservoirs, Rammey Marsh, and links on to Epping Forest and upper Lea Valley, and also the walking routes of the Lea Valley Walk and the Capital Ring.	The points made have been noted as part of the green infrastructure evidence base which will inform the Local Plan
Mrs Claire McLean	Area Planner Canal & River Trust	Plans to improve the Lee Navigation towpath for cycling and walking. There will be key cycling network connections with Quietway 2 Bloomsbury to Walthamstow, and also Cycle Superhighways 1, 2 and 3 and Quietway 6, and it will provide a great network link in the modelled future cycling demand for London produced by TfL. We would welcome further discussion with LB Waltham Forest in developing the route, and would request that S106 funding from developers close to the waterway whose sites may benefit from the route and green space of the waterway is prioritised to support delivery of the route. We would also welcome further discussion around developing the network of cycling and walking routes to	The points made have been noted as part of the green infrastructure evidence base which will inform the Local Plan

Consultee Name	Organisation	Comment	Council (Officers) Response
		<p>maximise the potential of the waterway for health and well-being, leisure and sustainable travel. The route will link the Mayor 's Opportunity Areas of Docklands/Isle of Dogs, Olympic Legacy SPG, The Upper and Lower Lea Valley, Royal Docks and Beckton Riverside and major employment locations at Docklands/Canary Wharf, Cody Road/Electra/Prologis business parks, Olympic Park/Stratford, Lea Bridge, Tottenham, Northumberland Park, Edmonton, Ponders End and Waltham Cross. These growth areas will increase employment opportunities, therefore there will be a growing need to provide more and higher quality sustainable and active travel options.</p>	
Manpreet Kanda	RB of Kensington & Chelsea	<p>The council is generally supportive of the Direction of Travel 4. relating to delivery of on-site utilities and waste facilities on major sites. RBKC is the Waste Planning Authority for this Borough and is part of the Western Riverside Waste Authority (WRWA) area. The other waste planning authorities (WPAs) in 2 the WRWA include Hammersmith and Fulham, Wandsworth, Lambeth and OPDC (for land which falls within Hammersmith and Fulham only). To inform the LPPR on waste the Council has prepared a joint Waste Technical Paper (WTP) with the Waste Planning Authorities within the Western Riverside Waste Authority (WRWA) area. The joint WTP provides evidence on the waste movements in and out of RBKC. There are no significant waste movements from Kensington and Chelsea to Waltham Forest WPA. Waltham Forest is part of the North London Waste Plan grouping of WPAs. It may be appropriate for the Waltham Forest Local Plan to make appropriate reference to NLWP and any associated evidence base.</p>	This point is noted.
Transport for London		<p>TfL CD considers that this chapter should also recognise the role of town centre housing, as part of high-density, mixed use schemes, in addressing need in the borough. Consideration should be given to the standards and safeguards that would be required to ensure that housing and retail / leisure / commercial activities can successfully</p>	This point is noted.

Consultee Name	Organisation	Comment	Council (Officers) Response
		coexist in town centres.	
Transport for London		<p>Overall TfL understands and supports the continued delivery of infrastructure across the borough to support housing growth. TfL continues to work with the borough and GLA to develop suitable packages of transport measures, particularly in the context of growth in Housing Zones and Opportunity Areas. The borough should look to deliver Good Growth, through the six Good Growth Policies found within the London Plan (GG1-GG6), as well as ensuring the most efficient use of land at the optimum density, taking into account connectivity/accessibility and capacity of surrounding infrastructure (referring to Policies 06 and H1). 2. TfL welcomes the support for the importance of sustainable transport infrastructure which will assist in the delivery of the new London Plan Policies T1 and T3, including the delivery of the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041. This includes improving rail capacity, the electrification of the Gospel Oak to Barking line, as well as the continued delivery of the "Enjoy Waltham Forest" Mini-Holland cycling programme.</p>	The points made have been noted in drafting the new Local Plan.
Transport for London		<p>The local Plan should also actively promote and demonstrate the application of the Mayor's Healthy Streets Approach (Policy T2). (2) TfL welcomes further engagement with the borough in the continued development of the plan and the associated Infrastructure Delivery Plan. A key aspect of ensuring Good Growth is enabling services to efficiently operate across the borough, particularly in terms of ensuring infrastructure protection for bus standing, stops and welfare facilities. This would also include the hydrogen bus garage at Lea Bridge. TfL would welcome inclusion of this within the next iteration of the local Plan. (3) In order to support existing communities and jobs, as well as Good Growth, the local Plan should demonstrate how the borough needs to be supported by freight and servicing trips in the future (Policy T7</p>	The points made have been noted in drafting the new Local Plan.

Consultee Name	Organisation	Comment	Council (Officers) Response
Keira Murphy		<p>We can see the positive benefits of policy directions 3 and 4 regarding waste sites and on-site waste facilities. It will be useful to provide clarity on the waste issues the Local Plan will be dealing with as opposed to the North London Waste Plan. We are assuming the focus will be more site-specific and we have some recommendations for policy options as follows: New developments should take account of the need to move waste up the hierarchy by providing facilities or at least collection for reuse, remanufacture, possibly green procurement and other 'circular' methods and that development dovetails with council collections and strategies, etc. New developments should provide opportunities for the collection of recyclables in the design of the public realm. The GLA have been talking about publically accessible drinking water being made available to minimise plastic bottle use so you could have standards on public realm design for that also. Although comprehensive site waste management plans are no longer compulsory under legislation, Local Plans can still request their use and adoption for sites. Their adoption provides a way of identifying waste streams and their destinations early in the project and helps with duty of care for waste. There could also be a stipulation that the contractors adopt CEEQUAL standards for construction and possibly also BREEAM for the building design. These standards would take care of construction waste and waste produced at the end-of-life, therefore looking at the whole life cycle of the development. To improve air quality and reduce dust and particulate pollution, all waste storage and treatment activities should be carried out inside a covered building, enclosed on all sides with access and egress points covered by fast acting doors which default closed. Large open fronted buildings should be avoided as this provides a low pressure pathway for dust and particulate to escape the control of the operator.</p>	The points made have been noted in drafting the new Local Plan.
Aviva		The Local Plan should clearly set out the Council's priorities, to ensure	The points made have been noted in drafting the new

Consultee Name	Organisation	Comment	Council (Officers) Response
Investors		that planning obligations, in particular relating to infrastructure and affordable housing provision are prioritised accordingly. Section 5 notes the need for access to quality infrastructure, with areas of importance being transport, health, education and digital infrastructure. Page 31 notes that access to funding for infrastructure is challenging, and that the Council is working towards receiving maximum level of developer contributions possible. In this regard the Local Plan should make clear that the Council will not require developers to make up any shortfall for the delivery of statutory provisions, such as transport capacity upgrades or health provision, which are funded by other means i.e. taxation, travel fares etc.	Local Plan.
Mrs Juliemma McLoughlin	Greater London Authority	Waltham Forest's waste apportionment target has increased in the new draft London Plan. The borough will be expected to manage 199,000 tonnes of household and commercial & industrial waste by 2021 and 211,000 tonnes by 2041. Waltham Forest should ensure it has enough safeguarded sites to meet its apportionment target in accordance with draft new London Plan Policy SIB Waste capacity and net waste self-sufficiency.	This point is noted in drafting the new Local Plan. The Council is working with other North London boroughs on a Joint Waste Plan, which will ensure safeguarded sites to meet its apportionment target.
Highways England Company Limited		Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. Highways England will be concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN. Waltham Forest is located approximately 2km from the M11 Junction 4, and about 7km from M25 Junction 25. Therefore, due to the borough's proximity to the SRN, we will be concerned with proposals that may come	This point is noted in drafting the new Local Plan.

Consultee Name	Organisation	Comment	Council (Officers) Response
		forward in the Local Plan. After looking through the documents provided, it is clear that the Local Plan is in the very early stages of development. However, as the Local Plan progresses, I would advise that there should be a suitable transport evidence base that clearly shows the cumulative impacts of the Local Plan on the SRN.	
		MEETING SOCIAL INFRASTRUCTURE	
Ms Lucy Harrison		In Lea Bridge I have heard nothing about how social infrastructure needs will be provided in the new developments.	This point is noted in drafting the new Local Plan. The Plan will be supported by an Infrastructure Delivery Plan setting out detailed proposals/programme for infrastructure provision.
Ms Celia Smith		Recent planning applications that I have seen are light on detail for new infrastructure to support the number of housing units proposed making it difficult to effectively comment on the likely impact on local residents. More clarity around how capacity of schools, doctors surgeries etc. are to be ramped up would be helpful. How these aspirations may be achieved in light of pressure on funding from central government is unclear - these are all good in principle however I'm not sure how they can be delivered in light of changes to pupil funding etc.	This point is noted in drafting the new Local Plan. The Plan will be supported by an Infrastructure Delivery Plan setting out detailed proposals/programme for infrastructure provision.
Ms Emma Best		I want to know more about how transport links will be improved in areas currently outside of main bus lines and how you are thinking first and foremost about improving people 's lives and improving education and local schools through the plan.	The Plan will be supported by an Infrastructure Delivery Plan setting out detailed proposals/programme for infrastructure provision.
Mr Bob Sharples		Waltham Forest should seek to have formal community use agreements on school sites so that local residents can access not only the sports facilities, but the arts and other facilities which a school has to offer. Successive governments have stated that schools are the focus points of local communities, but too often the doors are closed to the local people for spurious reasons. A formal community use agreement created through a planning condition will be enforceable and maintain schools at the heart of local communities.	This point is noted in drafting the new Local Plan.

Consultee Name	Organisation	Comment	Council (Officers) Response
Ms Abigail Woodman		<p>Where the council should be directing their energies is into making sure that work together to prevent crime. Until recently I lived in a block of flats in Walthamstow the buildings that are built in the borough are well designed. Good design is, of course subjective but there is a strong desire amongst residents for buildings that integrate with the Victorian and Edwardian character of the borough. The concept of designing out crime is also challenging. Resilient communities, where people know their neighbours and collectively take responsibility for each other, and young people used to hang out in our communal garden. They left litter and made noise and, when they disturbed me, I went out to chat with them. They were unfailingly polite, often not realising the impact they were having and just wanted a place to relax and hang out. They often apologised at the inconvenience they were causing. At a local community forum I shared this insight and was told, in no uncertain terms by the Police Officers there, that they can never recommend people talk to each other because it can be dangerous. I can categorically say that over the course of a decade, I never once felt afraid; in fact I felt happier connecting with people I was living alongside. Encouraging people to call the Police when others, particularly young people, do something irritating, rather than talking to them, is how young people become alienated and criminalised. Far from designing out crime, beginning with the idea that crime is ever present and must be eradicated creates fearful, polarised communities where truly criminal behaviour has the space to flourish. Many residents are opposed to tower blocks in the borough because they are fundamentally changing what so many of us value: the low-rise Victorian and Edwardian neighbourhoods of family houses. To some extent, concentrating blocks of flats around transport hubs makes sense, theoretically reducing carbon emissions by reducing car ownership and “ if built to high environmental standards “ limiting water, electricity and gas</p>	<p>The points made have been noted in drafting the new Local Plan.</p>

Consultee Name	Organisation	Comment	Council (Officers) Response
		usage through shared services. However, it is the height of these tower blocks that is causing so much anxiety. While a building of five or six storeys can, if well designed, blend into its surroundings, a 27 storey block is nothing more than a priapic reminder that local people have very little say in what happens to the places they call home. I also question whether developers after a quick buck are thinking about the long-term environmental sustainability of the homes they are building and I am saddened that, to date, the Council does not seem to have set high standards and insisted that developers making money out of our home meet these standards. If, as many suspect, the drive to build expensive homes in the borough is the Council 's attempt to increase its revenue by increasing the number of people paying Council Tax, then let 's be honest about this. Let 's not pretend we are place making when, in fact, we are selling off our future to fund essential services now.	
Dr Helen Stedeford		You need to have serious discussions with the CCG about projected numbers of GPs and practice nurses over the next 10 years. Many parts of east London are facing a staffing hole as many local GPs hit retirement age in the next few years. It's also difficult to recruit and retain practice nurses and other staff. How is Waltham Forest going to be an attractive place for new GPs and other staff to work in- and most importantly stay in and commit to in the long term?	The points made have been noted in drafting the new Local Plan. The Council has been engaging with the CCG.
Mr Adrian Stannard	Planning Watch Convenor Civic Society	Social and Community infrastructure needs to take priority over new housing. It is important to plan an area properly not "just build more houses". Homes are created by the social and community infrastructure - houses are built by builders!	This point is noted in drafting the new Local Plan.
Ms Ros Bedlow		There is an increasing interest in food growing in the local community, shown for example by the positive response to the Cultivate Festival, the rapid uptake of mini allotments recently in Harvey Road in Leytonstone, and attendance at food growing workshops at Transition Leytonstone 's community garden in Church Lane. Growing food	This point is noted in drafting the new Local Plan.

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		<p>locally, whether at the household level or at sites such as Hawkwood brings advantages to the local community on many levels. Fresh homegrown produce is cheap and healthy, and the process of working with the soil is beneficial to both physical and mental health. Producing at least some food locally increases our resilience in the face of climate change, as extreme weather leads to food shortages and high prices. Food grown and sold locally strengthens our local economy I would like to see the Council building on what has already been done to support and encourage local food growing, and to make it an explicit part of their policy going forward.</p>	
Ewan Coke	LB Redbridge	<p>We welcome policies that safeguard community infrastructure, support their intensification and the provision of new facilities. We are aware that there are a number of libraries, GPs and sports centres/facilities close to the boundary between our boroughs that Redbridge residents are very likely to share and the policy approach to maintain and augment these facilities reflects the approach of Redbridge Council towards the development of infrastructure.</p>	This point is noted in drafting the new Local Plan.
HHGL Ltd		<p>My clients would request that the first draft of the Local Plan include a specific policy and/or supporting text to recognise and confirm the following: The important contribution that Bunnings will make to the local community once the store is converted to a Bunnings Warehouse - local community organisations such as schools, hospices, emergency services and youth groups will be supported through activities arranged by the store, which will include fundraising sausage sizzles, hands-on projects, local fundraising initiatives and product contributions</p>	This point is noted.
Ms Gillian Morgan		<p>Community growing provides benefits to the individual for mental health and wellbeing, levels of physical activity and improved access to healthy food. There are also wider environmental and social benefits from engaging local groups in food growing as well as the aesthetic improvement to the public realm. We would welcome</p>	This point is noted in drafting the new Local Plan.

Consultee Name	Organisation	Comment	Council (Officers) Response
		policies which: Protect existing community food growing spaces. Support, through strategic planning policies, the provision of new community food growing spaces in or near existing housing	
Mrs Juliemma McLoughlin	Greater London Authority	The Mayor would support Waltham Forest's local policy direction for the provision of social and community infrastructure.	This point is noted in drafting the new Local Plan.
Natalie Szarek	The Community Food Growers Network	Community food growing projects should be recognised as key players in creating spaces that support community cohesion, education, employability and innovation. Waltham Forest residents have high rates of diabetes, obesity, cardiovascular disease and other diet related conditions. An emphasis on healthy, high-nutrient and chemical free food would have a positive impact on the health of residents. Policy Proposal: Waltham Forest will foster a new generation of London food producers to work in a globally innovative urban food system by funding and supporting: Accredited training in organic food production. Paid work placements "" apprenticeships and shorter-term placements (e.g. 6 months) that support (young) people to further develop skills in the work environment and provide sustainable employment opportunities. Associated 'next steps' training "" e.g. enterprise training, community development training.	This point is noted in drafting policies for the new Local Plan. Issues relating to funding/ supporting accredited training, apprenticeships and shorter-term placements strictly fall outside the remit of the Local Plan, but would be considered as part of other delivery mechanisms.
		DISTINCTIVE TOWN CENTRES & HIGH STREETS	
Miss Susan Murray		Why is there NEVER any mention of the Markhouse Rd / Lea Bridge Rd / Church Road area? It's an absolute dump, horrible to be in the area, pavements all cut up from utility works, covered in chewing gum and rubbish. The streets are lined with betting shops and gangs of men. The local hostel folks can be found passed out drunk lying across pavements. Unlike the Bakers Arms the shop fronts have had ZERO investment to make their fronts look presentable. It's the FORGOTTEN CORNER OF WALTHAMSTOW and no one seems to give a shit. You'd rather build up the Lea Bridge town centre with buildings that are way too tall and block off our beloved Marshes. I would like a proper reply	This point is noted in drafting the new Local Plan. The Council is considering opportunities for growth in many parts of the borough including along the Markhouse Corner/ Lea Bridge Road corridor. Such areas will be supported with increased investment through regeneration projects.

Consultee Name	Organisation	Comment	Council (Officers) Response
		to my question.	
Mr Keith Pilling		Far too many fast food outlets proliferate in the borough, most restaurants provide cheap high calorie unhealthy foods and very few provide allergy information to customers, fewer still supply foods and environments which are allergy free, processed carbohydrates and sugary foods and drinks predominate despite the present epidemic of diabetes, hygiene standards in many establishments are below the required standard, litter from fast food is a recurrent problem in many areas of our borough as is an increase in vermin (including foxes insects and rats) which residents of our borough have to live with.	This point is noted in drafting the new Local Plan. The new Local will include policies to manage the proliferation of particular types of uses throughout the borough.
Miss Jean Harvey		I like to see more flats and houses and toilets in Walthamstow market and new cafes and trader shops and a new Bonmarche shop in Stratford and one in Walthamstow and one in Chingford E4. These will be dependent on how transport connectivity across the borough can be improved as noted earlier. Currently getting across the area can typically involve a change of bus and may or may not be quicker to walk for journeys up to 45 minutes given congestion through Walthamstow at peak times.	The points made have been noted in drafting the new Local Plan.
John Field		I do however note the desire to take new developments seriously, including use of CAFE. I doubt I'm the only resident who sees positive outcomes like The Scene more than outweighed by negative ones such as 97 Lea Bridge Road and skyscrapers at Walthamstow Central / The Mall. I appreciate this is a thorny topic, though, and the council has limited options here - especially given the contradictory desires of many residents for the council to "do something", yet not "gentrify" anything, yet not have to pay for any of it, and not finance it via land sales either.	Comment noted.
Ms Abigail Woodman		When I first moved to the borough in 2001, the different town centres " Leyton, Leytonstone, Walthamstow and Chingford " all had distinct identities but seemed to be equal. The Council acknowledges that Walthamstow has received significant investment over the last few	Comment noted.

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		years and people living in other parts of the borough are becoming more and more aggrieved. It is wrong to focus on making Walthamstow the major town centre in the borough. It would be far better to spread investment across the borough, or the Council risks setting one community against another. It would also be wise for the Council to remember that creativity emerges in edge lands; places where people can experiment and explore boundaries. There has been much creativity in the borough over the years, which the Council rightly celebrates, but the Council's strategy risks destroying the very thing that nurtured this creativity. Tidy place-made places are rarely, by their very nature, creative.	
Ms Julia Ingall		Improvements to shop fronts have not been maintained, if this, or any similar policy is to be effective it must be maintained and not a one off capital investment without any control.	Comment noted.
Kentucky Fried Chicken (Great Britain) Limited		We dispute the premise that hot food takeaway shops in particular are likely to make people unhealthy. We consider that food high in fat, salt and sugar are available from a range of uses (for example, pubs, cafes, coffee shops, bakeries, etc) and that any such land use could make people unhealthy if it were misused or overused. We agree with the other policy directions and consider that hot food takeaways ought to be included in policy direction. As long as there is a good balance of uses and no one type of use dominates a centre or an area, then there is no reason why any particular use need necessarily be a problem in retail or human health terms.	This point is noted in drafting the new Local Plan.
Mr Adrian Stannard	Planning Watch Convenor Civic Society	Retail is changing to online so as this is a plan for next 15 years it has to be assumed retailing will not be the same and Town Centres will be more about the evening economy and people coming together in cafes etc. Attention should be given to encouraging cafes and restaurants in all residential areas so people have to travel less. Walthamstow Town Centre should not be allowed to have high rise buildings as it will just congest the area. These resources need to be	This point is noted in drafting the new Local Plan. The Council intends to carry out a study on Town centres and Retailing to better understand and plan for the ongoing changes in the retailing industry.

Consultee Name	Organisation	Comment	Council (Officers) Response
		spread across the Borough so that communities can come together locally and not have to travel to one large centre. The change in shopping habits make Walthamstow Town Centre more vulnerable to failure than say Chingford where local communities can still come together to shop for everyday items.	
Mr Philip Herlihy		I don't understand why the thinking that leads to these policies is felt to be consistent with the construction of huge and inappropriate tower blocks of small dwellings in Walthamstow.	This point is noted. The draft Local Plan will contain greater detail on the policy approach to be taken.
Mr Daniel Palman	Berkeley Homes (North East London) Ltd	We support the Council in their desire to identify and promote distinctive town centres particularly in the case of Walthamstow Major Town Centre. Walthamstow has undergone and continues to be subject to major regeneration within the Borough in part assisted by the Victoria and Overground lines. With additional development and substantial new homes proposed for the area, it is evident that the designation of Walthamstow as a Major Town Centre will be key in providing the necessary facilities to support the area.	Support noted.
Mr Daniel Palman	Berkeley Homes (North East London) Ltd	The identification of Leyton as a District Centre is supported in line with the publication of the Lea Bridge and Leyton Vision (2017), and the draft London Plan identifies the Vision Area as being within the Lee Valley Opportunity Area. The draft London Plan places great emphasis on 'Good Growth' within Greater London and the proposed regeneration. Identified within Leyton in the Vision document will assist in this approach. It will reinforce already strong communities by providing substantial increases in new homes and jobs. New mixed use developments making effective and optimum use of existing land will create improved neighbourhoods for the area. We would encourage the Council to adopt the policy approach within the draft London Plan which seeks to promote Town Centre locations and Opportunity Areas, such as Lea Bridge and Leyton as areas capable of supporting higher density developments. This approach is strongly supported by the NPPF and draft London Plan policies SD6 and D6. In	The points made have been noted in drafting the new Local Plan.

Consultee Name	Organisation	Comment	Council (Officers) Response
		<p>addition to the comments regarding Leyton Town Centre we support the proposals for a new station at Ruckholt Road identified within the Area Vision. The potential increased transport accessibility of the area will provide a strong catalyst for the redevelopment of key sites within Leyton. The opportunity to deliver this infrastructure as part of the regeneration of Leyton is important to achieving the ambitious targets for the area, and the success of the Lea Bridge and Leyton Vision.</p>	
Catalyst Housing & swan housing asc		<p>The Associations support the establishment of a new town centre at Blackhorse Lane to take advantage of the area's high level of public transport accessibility and to support the optimum sustainable development of the area within its vicinity. Whilst there is a high level of committed development within the vicinity of Blackhorse Lane area, the Associations, alongside the Greater London Authority, have identified a sustainable opportunity to re-develop the former Webbs Industrial Site, Blackhorse Lane to provide much needed housing in a sustainable location, in accordance with adopted and emerging local, regional and national planning policy. The proposals will bring a vacant site back into use, delivering much-needed and high quality affordable housing for the borough's diversifying population, employment opportunities, and will improve permeability and connectivity in the area. This will in turn assist in the prosperity of the town centre by opening up routes to and from the centre, and transport infrastructure, for the existing community. The establishment of a new centre at Blackhorse Lane will support the optimisation of such sites, and specifically the Former Webbs Industrial site, in an area benefitting from a high level of public transport accessibility.</p>	<p>The points made have been noted in drafting the new Local Plan.</p>
Mr Matthew Fletcher	Metropolitan Police Service	<p>SBD also covers Commercial aspects of Design, including Shops, Schools, Hospitals and Places of Worship. As Waltham Forest "is one of the fastest growing economies in London with an annual rate of 12%, nearly twice as high as the London average of 7%" (Pg 33), there</p>	<p>The points made have been noted in drafting the new Local Plan.</p>

Consultee Name	Organisation	Comment	Council (Officers) Response
		is an onus on the Borough to make sure that the security keeps up with this increase. This is particularly important as Waltham Forest does not currently have a substantial Night-Time Economy. With the plan to make "our town centres and high streets leisure and cultural destinations not just in the day, but in the evening (Pg 22), this will bring new challenges and pressures to keep up with the increased footfall and potential crime associated with this.	
Mr Tim Brennan	Historic England	We support the policy directions under consideration, and welcome the aspirations around using the local distinctiveness of existing retail centres as part of their future economic development. Historic England strongly believes local character offers an excellent tool in developing a 'point of difference ' for retail districts and addressing modern shopping trends. Further background and evidence can be found here: https://historicengland.org.uk/images-books/publications/changing-face-high-street-decline-revival/	Support noted.
Mr Tim Brennan	Historic England	We would point out that a number of conservation areas in the Borough cover town centres, and their significance should form part of the considerations on decisions for future development and uses.	The points made have been noted in drafting the new Local Plan.
HHGL Ltd		The Homebase-Bunnings site is located on the edge of this town centre, just to the north of the main high street (Wood Street) - a view supported by the fact that the Homebase was included within the draft Area Action Plan (AAP) for Wood Street Town Centre produced in July 2013 (the AAP was progressed to the Proposed Options stage, but was not adopted). The Homebase-Bunnings occupies, therefore, an important edge-of-centre location and offers the opportunity for customers to link their shop with visits to other retail businesses and service providers within the Town Centre.	This point is noted in drafting the new Local Plan.
Ms Gillian Morgan	Capital growth	We would welcome policies which: Restrict opening hours of hot food take-aways in close proximity to schools as well as to other places that young people meet to the times children are most likely to be passing by. Support provision of independent shops or temporary market	This point is noted in drafting the new Local Plan.

Consultee Name	Organisation	Comment	Council (Officers) Response
		stalls to enable food hubs to thrive, supporting local food businesses.	
Chris Weston		Encouraging a greater degree of differentiation between the borough's local centres is equally misguided. The differences in the look and feel of one area compared to another are things that happen naturally and organically over a long period of time. They are emphatically not things that a council should be trying to impose or alter. And when councils do try to do this, they make a mess of it.	This point is noted and will be carefully considered in drafting the new Local Plan.
Chris Weston		My own local area of St. Jame's Street (please note correct spelling) has now been saddled with possibly the world's worse seats. Why? because someone in the Council thought it would be a good idea to have "bespoke" seating that would give a distinctive image to this area, as part of the recent (and expensive) 'improvements'. The sole purpose of a seat is not to give a distinctive image to an area, but to allow people to sit down for a while in comfort. But because you wanted something "distinctive", something different, we have ended up with 4 appalling monstrosities that hardly anyone sits on, in stark contrast to the comfort and well-used seats that were there before. It is a classic example of the "tail wags the dog" tendency that I have often observed in planners. Instead of trying to make each local centre look "different" and "distinctive", you should be making them all feel welcome to everyone. And if that means having identical comfortable and inclusive seating through-out the entire borough, where is the problem? If each centre has the basic goods and services people want, and comfortable seating to rest on, they will come.	This point is noted and will be carefully considered in drafting the new Local Plan.
Chris Weston		The other vital factor in encouraging people to use local centres is the availability of toilet facilities. If there is anybody in the Planning Policy Team who can remember back that far, please recall that, a decade and a half ago, the council presented residents with a list of possible cuts. Least acceptable to the public when you published the results	This point is noted and will be considered in drafting the new Local Plan.

Consultee Name	Organisation	Comment	Council (Officers) Response
		<p>was the closure of our public toilets. Yet the council went ahead and closed them all anyway! The community toilet scheme is an acceptable alternative in principle, but has been so badly managed by Officers over recent years as to be almost useless, particularly in terms of absent and/or error-strewn on-street information. (This, happily, is now beginning to improve, after I involved the Leader of the council, following two years of my letters to officers highlighting information errors being totally ignored. Toilet facilities are so definitely a crucial factor in encouraging footfall in retail centres (particularly for older people) that I am surprised to find no mention of it at all in your document.</p>	
Chris Weston		<p>"Building on our distinctive retail centres - each with a unique offer in terms of their place setting" does this mean anything other than 'each of our town centres is in a different place'? If so, it is pure tautology. if not, its meaning is just not clear even to this qualified ex-planner! Worse is the second clause "encouraging a greater degree of differentiation and specialisation between them" . Firstly, I do not believe for one moment that real people (as opposed to tidy-minded planners) want specialisation of function between all out local town centres. People want their basic needs to be met in their own area. If you live in Higham's park (say) you don't want to have to go to Leytonstone to find a key-cutting service because Leytonstone has been designated by the council as the borough's key cutting centre. Or to have to go to Chingford Mount to find a butcher because the Council has designated it as the meat centre of the borough.</p>	<p>This point is noted and will be considered in drafting the new Local Plan.</p>
Chris Weston		<p>I am particularly disappointed by Policy direction 6 (page 47), the first clause of which strikes me as utterly meaningless, and the second clause as misguided.</p>	<p>This point is noted in drafting the new Local Plan.</p>
Transport for London		<p>TfL CD considers that this chapter should also recognise the role of town centre housing, as part of high-density, mixed use schemes, in</p>	<p>This point is noted in drafting the new Local Plan.</p>

Consultee Name	Organisation	Comment	Council (Officers) Response
		addressing need in the borough. Consideration should be given to the standards and safeguards that would be required to ensure that housing and retail / leisure / commercial activities can successfully coexist in town centres.	
Aviva Investors		Our Client supports the focus for growth and continued promotion of Leyton as a town centre in the Borough. Our Client welcomes the Council 's commitment to supporting and promoting retail, business, cultural, leisure and residential investment in Town Centres, and the desire to grow the evening economy to attract both residents and visitors to the Borough.	Support noted.
Aviva Investors		Our Client welcomes reference to LBWF supporting increases in capacity on the Central line, and other sustainable transport improvements, which should be encouraged by the Council.	Support noted.
Mrs Juliemma McLoughlin	Greater London Authority	Walthamstow and Leyton town centres have been identified as having medium potential for commercial growth. New retail provision at Lea bridge and Blackhorse Lane should be limited in order to support existing town centres.	This point is noted and will be considered in drafting the new Local Plan.
Juliemma McLoughlin	Greater London Authority	The Mayor would welcome a local policy on managing betting shops and hot food takeaway in line with draft new London Plan policies GG3 Creating a health city and E9 Retail, markets and hot food takeaways.	This point is noted and will be considered in drafting the new Local Plan.
Natalie Szarek		Rather than focussing on eliminating hot food takeaways, we would like to see a more proactive support of local businesses, including local food enterprises. Therefore our policy proposals under (8) Building a Resilient Economy would also boost sustainable and vibrant Town Centres which offer healthy, community-building retail and dining options.	This point is noted and will be considered in drafting the new Local Plan.
		GROWING OUR CULTURE AND VISITOR ATTRACTIONS	
Ms Lucy Harrison		Please continue to consider the provision of affordable artist studio spaces. Although some flexible workspaces have been provided recently we still have very few self-contained affordable work spaces	This point is noted and will be considered in drafting the new Local Plan.

Consultee Name	Organisation	Comment	Council (Officers) Response
		for artists such as those in Hackney.	
Mr Keith Pilling		Culture in the borough at present consists mainly of betting and drinking alcohol and coffee while this does facilitate socialising to some extent it does produce disadvantages, restaurants tend not to provide good healthy food for customers, attempts to introduce 'culture' in the borough seem to focus on visual arts - chiefly painting or sculpture, areas somewhat neglected in adult education in this borough for some time in my experience. Transport arrangements within the borough do not encourage outsiders to visit cultural events when they are provided, too many pop-up establishments will relocate to more accessible locations quickly if things do not improve.	This point is noted and will be considered in drafting the new Local Plan.
Mr Bob Sharples	Sport England	I would also encourage Waltham Forest to support more sporting activities at all levels: local, regional and national to attract more visitors.	This point is noted and will be considered in drafting the new Local Plan.
Ms Abigail Woodman		The Council rightly celebrates the William Morris Gallery, but must not forget that it wanted to close the gallery and it was a hard-fought campaign by local people that secured its future and helped turn it into what it is now. Just sometimes residents do know best.	Comment noted.
Planning Adviser	Theatres Trust	To support the objectives of the London Plan and para 70 of the NPPF, the Theatres Trust recommends the policy include a clear statement that existing cultural facilities (or those last used for a cultural purpose) will be safeguarded and protected from redevelopment. We'd recommend including wording such as: Development of new cultural facilities will be supported and should enhance the well-being of the local community, and the vitality and viability of centres. The loss or change of use of existing cultural facilities will be resisted unless replacement facilities are provided on site or within the vicinity which meet the need of the local population, or necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision; or it has been demonstrated that there is no longer a community need for the facility or demand for another	This point is noted and will be considered in drafting the new Local Plan.

Consultee Name	Organisation	Comment	Council (Officers) Response
		cultural use on site. The temporary and meanwhile use of vacant buildings and sites by creative, cultural and community organisations will also be supported, particularly where they help activate and revitalise town centre locations and the public realm.	
Mr Adrian Stannard	Planning Watch Convenor Civic Society	The loss of open space in Walthamstow Town Centre goes completely against these policies. There is no point in spending time on these policies if they are going to be ignored when a developer doesn't like them.	Comment noted.
LVRPA	Lee Valley Regional Park Authority	The Regional Park is a significant piece of the Borough's green infrastructure comprising over 500ha. Key sites include Banbury Reservoir, the eastern part of Tottenham Marshes, the Walthamstow Wetlands, Walthamstow Marsh, Leyton Marsh and Lee Valley Ice Centre, Lee Valley Riding Centre, Waterworks Centre and Lee Valley Hockey and Tennis Centre. Over 340,000 of the Borough's residents visit these sites. London Plan Policy 4.5, identifies a series of 'strategic cultural areas' across the capital which includes the Regional Park. These are defined by significant clusters of visitor attractions where strategic policy requires support for their special character. Given the important contribution which the Regional Park makes to your Borough's leisure and recreation needs, the draft plan should recognise this role. This would be in conformity with the adopted London Plan. The draft plan should reference the considerable investment which is being considered for a new Ice Centre on Lea Bridge Road, Lee Valley Leisure Trust's plans for improving the offer at Lee Valley Riding Centre and the Authority's joint work programme in securing investment with the Council in Walthamstow Wetlands and on improving cycling and walking to and across the Regional Park. Further references should be made to the Authority's planning functions as identified under section 14 of the Lee Valley Regional Park Act 1966 and our adopted area proposals and our current programme of work which includes the development of strategic	This point is noted and will be considered in drafting the new Local Plan.

Consultee Name	Organisation	Comment	Council (Officers) Response
		policies.	
Mrs Claire McLean	Area Planner Canal & River Trust	There is no reference to the Lee Navigation or Lee Valley Regional Park in this section, despite both providing general visitor and leisure destinations.	This point is noted.
Mrs Juliemma McLoughlin	Greater London Authority	Waltham Forest should protect and promote cultural venues including pubs and the night-time economy in draft new London Plan policies HCS Supporting London's culture and creative industries, HC6 Supporting the night-time economy and HC7 Protecting Public houses.	This point is noted and will be considered in drafting the new Local Plan.
Mrs Juliemma McLoughlin	Greater London Authority	Waltham Forest is encouraged to strengthen areas with clusters of cultural facilities and designate them as Cultural Quarters and establish Creative Enterprise Zones. Walthamstow has been designated as Night-Time Economy Area of Regional/Sub-regional importance (NT2).	This point is noted and will be considered in drafting the new Local Plan.
		CREATING HIGH QUALITY PLACES	
Ms Lucy Harrison		These policy directions sound good. I just wish that they had been considered in recent planning decisions. I do not feel that many of the new developments are appropriate density or massing.	Comment noted.
Ms Celia Smith		Regarding massing / height. As noted earlier, a clear maximum height of 10-15 storeys to be consistent with currently constructed buildings would be good. Any higher would be out of character with other local developments (including Travelodge / Hale Village etc.). The use of design review panels etc. is good.	Comment noted.
Mr. Gordon Turpin		Re: "Encouraging appropriate density, scale, massing, and height in development to reflect the character, local distinctiveness, and context of the Borough." Character varies across the Borough and retaining distinctiveness as referred to in the policy direction should be considered by reference to the different areas which make up the Borough rather than Borough wide. To illustrate the Higham's Park Plan is divided into 9 character areas each of which are different in character and design. In other words: the density, design and massing	Comment noted. To inform policy development, the Council intends to carry out a Characterisation and Intensification Study.

Consultee Name	Organisation	Comment	Council (Officers) Response
		allowed in new developments will need to vary depending on where in the Borough the development is located.	
Mr Bob Sharples		Need to include Active Design Principles in new schemes and also to employ in-house architects or architect/planners. Up skilling the current planning staff in design training would also help. NB Urban designers are just one branch of the built environment and are not always best placed to comment on individual matters of design.	Comment noted.
Ms Julia Ingall		Innovative design please, all new developments are boring and same old style as throughout London, more imaginative designs please.	Comment noted.
Mr Adrian Stannard	Planning Watch Convenor Civic Society	The Council has allowed 4 tower blocks in Walthamstow Town Centre one of which is higher than many blocks in central London. Important Conservation Areas are having their views ruined by this development. Huge monstrous tower blocks are being allowed in Lea Bridge Road which should be the buffer land to the Lea Valley and the Lee Valley Park - one of our best open spaces. The council has proved it has no idea what "good design" is.	Comment noted. To inform policy development, the Council intends to carry out a Characterisation and Intensification Study.
Mr Daniel Palman	Berkeley Homes (North East London) Ltd	We fully support the importance of good design, and the role this plays in creating sustainable environments to help complement existing communities. Berkeley Homes and St William champion exceptional design within all its schemes and the benefits of this approach can be seen in the quality of life experienced by its residents, and those visiting our developments. We welcome the Council promoting tall buildings in appropriate locations served by public transport and within Town Centres, and the principle of using tall buildings to define key locations particularly in association with public realm. The subsequent higher densities that come with taller buildings can deliver major benefits for the Borough through increasing the number of homes being built, the number of jobs that can be created, and through the improvements to infrastructure that can be supported by the additional densities. The provision of tall buildings also provides opportunities for significant improvements to	Support noted.

Consultee Name	Organisation	Comment	Council (Officers) Response
		public realm, and for greater amenity areas at ground level. This delivers improved permeability, enhancing the enjoyment of places and increasing demand for active ground floor uses.	
Mr Daniel Palman	Berkeley Homes (North East London) Ltd	In conjunction with the support for tall buildings, we would encourage the new Local Plan to reflect Policy D6 and DB of the draft London Plan. The policies require development proposals to make the most efficient use of land and be developed at the optimum density. The optimum density of a development should result from a design-led approach to determine the capacity of the site. The approach of intensifying development around well-connected transport nodes forms an important part of the Mayor's vision for the city. The Council should seek to explore the potential of areas around a number of key interchanges as locations for significant and much higher-density housing development.	This point is noted in preparing the new Local Plan.
Mr Daniel Palman	Berkeley Homes (North East London) Ltd	We support the Council in continuing to pursue the Design Review Panel (DRP) process within the Borough. The DRP process is important in providing independent guidance on the appropriateness of development but also the ensuring design is of sufficient quality to last its lifetime. This is in line with Policy D2 of the draft London Plan.	Support noted.
Catalyst Housing & swan housing association		The Associations are committed to the excellent design of each new development in accordance with established urban design principles, and therefore agree with the principles and direction of the future policy outlined. As a part of this process, the Associations are committed to the development of appropriate density, scale, massing and height and the Associations consider locations which benefit from a high level of public transport accessibility and within close proximity of town centres to be appropriate locations for an intensification and optimisation of floorspace output within high density development. It is considered that the Blackhorse Lane area, and specifically the former Webb's Industrial Site, is such a location; this is supported by the adopted London Plan (2016, consolidated with alterations since	Support noted. Other points are also noted in preparing the new Local Plan.

Consultee Name	Organisation	Comment	Council (Officers) Response
		2011) and the draft London Plan (2017), which seek to optimise the delivery of residential accommodation, especially on those sites benefitting from public transport accessibility levels of 3 “ 6 and / or which are located within 800m of a tube or rail station. The London Plans (both adopted and emerging) support the optimisation of housing delivery of land within regionally identified Opportunity Areas, such as the Lee Valley Opportunity Area within which the Blackhorse Lane area and the former Webb’s Industrial site are located.	
Mr Matthew Fletcher	Metropolitan Police Service	It is a Metropolitan Police Service priority to protect vulnerable people. Safe design will help those who are more vulnerable. With an anticipated increase of over 65 year olds and households with children (47% and 11% respectively - Pg 30) by 2033, the design of suitably planned locations will be paramount for their welfare and continuing good health.	Comment noted.
Mr Matthew Fletcher	Metropolitan Police Service	By including a requirement in your Core Planning Strategy that new schemes comply with the principles of Secured by Design after proper consultation with Designing out Crime Officers, we are better placed to deliver secure developments across the London Borough of Waltham Forest. We would also ask that we are and remain involved in the Design Review Panel (Pg 54) to help promote safe and secure Design for Waltham Forest.	This pointed is noted. The Council will work with Metropolitan Police to promote safe and secure Design.
Mr Tim Brennan	Historic England	We note the Council’s aspiration to deliver successful growth across the Borough over the plan period. In general terms we would recommend that the next iteration of the Plan should take account of the potential impacts of tall buildings on the historic environment and any identified view corridors. Tall buildings, when appropriately sited and designed, can be a highly effective way of delivering development at greater densities. However, their impacts need to be carefully considered ‘such development needs to be properly plan-led, having been tested against the effects on relevant heritage assets and on	The Council intends to update the 2009 Characterisation Study. This would also deal with the issue of intensification/tall buildings.

Consultee Name	Organisation	Comment	Council (Officers) Response
		<p>local character. Potential impacts across council boundaries also need to be considered. Again, the existing characterisation study may offer a starting point for such analysis, although we would further encourage the Council to ensure that this approach is rigorously evidence-based through a borough-wide tall buildings study. This would help provide a local and contextually based definition of what is meant by tall, as well as understanding potential locations which are (and are not) suitable for such buildings. We would encourage the use of Historic England 's advice on tall buildings in developing relevant plan content (https://historicengland.org.uk/images-books/publications/tall-buildings-advice-note-4/).</p>	
Mr Tim Brennan	Historic England	<p>We note and support the policy directions as well as the accompanying text. We would reiterate our comments on potential tall buildings as set out above.</p>	Support noted.
Andrew Haughey	Capital & Regional	<p>Our Client supports the aspiration for high quality and inclusive design. As noted in our recent representations in relation to the draft Affordable Housing and Viability SPD, the Council will need to make clear whether scheme viability will influence the Council 's approach to design etc. to ensure the maximum affordable housing can be achieved or whether design is the Council 's top priority where viability constraints are applicable. Where affordable housing is determined to be the top priority, then the role and influence of any Design Review Panel needs to be clarified, as this is likely to differ from schemes where quality is the top priority. Similarly, should instances arise where the Council disagrees any views expressed by the Panel, the Council may wish to include provision for such circumstances in their design policies. Given the need to accommodate significant growth, in particular housing, we agree that the Council should give further consideration to, and confirm in the Local Plan, where tall buildings are acceptable in principle.</p>	These points are noted and will be considered in developing policies.
Mrs Claire	Area Planner	<p>We would suggest that the Lee Navigation be recognised here as an</p>	This point is noted.

Consultee Name	Organisation	Comment	Council (Officers) Response
McLean	Canal & River Trust	asset within the borough, to be emphasised within development proposals. It should also include access and links to, as well as from, the borough boundaries.	
Mrs Claire McLean	Area Planner Canal & River Trust	<p>We note that the proposed policy directions here require that careful consideration should be given to the location of tall buildings, which we support. The National Planning Policy Framework seeks to secure high quality design as a core planning principle. To achieve this in plan-making for an area where tall buildings are to be encouraged, it is recommended that the potential impact of buildings of various heights and forms is modelled to assess their impact on surrounding heritage assets and the general historic character of the areas that may be affected. The London Plan (policy 7.7) requires that tall buildings should only be considered in areas whose character would not be affected adversely by the scale, mass or bulk of a tall or large building. It also requires that they "should not affect their surroundings adversely in terms of microclimate, wind turbulence, overshadowing, noise, reflected glare .. [and] navigation". The policy is clear that the impact of tall buildings proposed in sensitive locations, including Conservation Areas, should be given particular consideration. We also note that Birmingham City Council 's Planning Policy Framework for Tall Buildings (2003) advises "An overly large number of tall buildings could not only be damaging to the physical environment, but could prejudice the success of the city 's urban regeneration policies." Heritage England published an advice note: Tall Buildings, in December 2015, which advises that consideration of the impact on the local environment is also important, including microclimate, overshadowing, night-time appearance, light pollution, the environment and amenity of those in the vicinity of the building. While we acknowledge that there are places where tall buildings can be a valuable element of successful placemaking, the Trust 's concerns for the potential negative impact of tall buildings around our</p>	These points are noted in preparing the design policies of the Plan.

Consultee Name	Organisation	Comment	Council (Officers) Response
		<p>waterways include: potential impact on the heritage value of the waterways, potential adverse wind impacts, and overshadowing of the waterspace and towpath. Tall buildings close to the waterway could cause overshadowing, which could impact on the canal as an important ecological resource, and affect its value as a heritage and amenity asset. However, we would suggest that the policy is unclear as to what is meant by 'tall'. Developments that are relatively lower in scale, but still more than 2 storeys, can cause overshadowing of the waterspace and an impact on its ecology and users. We would request that all development proposals be required to assess potential overshadowing impacts on the canal and its towpath, and that overshadowing should be avoided where possible. If accepted, the impact should be mitigated through imposed measures. Tall buildings close to the waterway can also impact on the heritage value of the waterways, and affect wind microclimate and can affect boats trying to navigate past. We would therefore also ask that development proposals be required to consider these impacts as part of their environmental assessments. Overshadowing can impact on biodiversity, as the reduced light and cooler temperatures may limit the population growth of phytoplankton and macroplankton food sources in the shaded areas, which could affect fish populations, and in turn bird populations. Tall buildings adjacent to the waterway can also create a 'canyoning' effect, reducing its amenity value. The quality and use of the towpath and water space as an amenity asset, for pedestrians, anglers, and boaters, can also be affected by shading. Under BRE guidelines for daylight and sunlight, open spaces (which water spaces are often assessed as) are required to receive just 2 hours of direct sunlight on 21st March. However, waterways are not just open space; increasingly they are places where people are choosing to live. Loss of sunlight can impact on the use of solar panels, which many boats make good use of to provide power, particularly for</p>	

Consultee Name	Organisation	Comment	Council (Officers) Response
		<p>boats in residential use. A boat may be in residential use even on a visitor mooring, as boats are able to moor along the towpath (unless there are local restrictions) for up to 14 days, before moving to another area, and these type of moorings are well used in Hackney. Without the ability to use solar panels, boats would need to rely on generators and fuel burning stoves, causing potential conflict with adjacent waterside residents. Waterside developments must be accompanied by a daylight and sunlight assessment that correctly identifies the water space and towpath as a sensitive receptor, and not just as an open space. If a development was likely to cause additional overshadowing of the water space, we would expect mitigation measures to be introduced as part of the proposal, to be secured by condition or S106 agreement, as appropriate. These could include ecological enhancements to the canal environment, and in the case of impacts on moorings, the introduction of electric bollards may help to mitigate this.</p>	
Mrs Claire McLean	Area Planner Canal & River Trust Transport for London	We would suggest that the Lee Navigation be recognised here as an asset within the borough.	This point is noted.
Transport for London		<p>TfL CD agrees generally with the proposed policy directions. We intend our developments to be of the highest standards of design and will be working closely with the Mayor of London 's Design Advocates to help us achieve this. The Plan will need to encourage high density development (potentially including tall buildings) in town centres, near transport hubs and in other accessible and sustainable locations. There is a strong 'placemaking ' argument in favour of tall buildings at and close to public transport hubs. This maximises density in the most accessible / sustainable locations and, therefore, optimises housing provision in the borough. It can also provide a landmark which aids</p>	This point is noted in drafting the new Local Plan.

Consultee Name	Organisation	Comment	Council (Officers) Response
		wayfinding and promotes the use of public transport. This should be recognised in Local Plan policies.	
Mr Philip Herlihy		As anyone at the recent planning meeting should readily have picked up, there is very wide opposition to the proposals to ‘crop’ the Town Square, apparently for the benefit of investors in the Mall, and to build tower blocks which are wildly out of proportion to the local built environment. {What, we wonder, would the Prince ‘s Trust for the Built Environment make of this?}. As a nearby resident of decades ‘standing, I ‘m in touch with a very large number of local people, and I haven ‘t met anyone personally who thinks this is a good idea (though I did spot one supportive comment on Facebook, and there were two supporting comments at the planning meeting). It seems to violate several of the aspirations set out in the ‘Direction of Travel ‘document’ the protection and cultivation of open spaces and local character, and the matching of housing provision to local need, rather than developer profit. I ‘ve yet to see anyone seriously suggest the new towers will enhance the look, amenity or character of the area, and local people value the amount and character of open space far more than any water-jet distractions. If you talk to people in pubs, cafes, shops and local online forums you’ll know this is how people feel.	Comment noted. Decision making on planning applications often involves a process of ‘weighing up’ several relevant factors. The Council as the planning authority must exercise its judgement and consider many (sometimes) conflicting issues to decide whether planning permission should be granted. For plan making, this means ensuring that the local plan contains the relevant polices to inform decisions. The draft plan will be published for consultation before it is finalised.
Mr Philip Herlihy		Personally (and as someone hurt badly by it) I think the vehicle-barrier element of mini-Holland is neglectful of the needs of real people and imposed in an authoritarian way, with supposed ‘consultation ‘ manipulated to engineer thin apparent support. It’s easier to conceive that the Mall development (though I abhor the prospect) is actually a reasonable decision given all the circumstances. Perhaps the London Plan mandates a certain number of dwellings, and there really is (?) nowhere else they could go “” though surely something less brutal could have been designed in that case. But my point is that the council is failing to convince the people it serves. Cynicism is	Comments noted. The draft Local Plan will be published for public consultation before it is finalised. When finalised, there would be a further round of statutory consultation before it is formally adopted.

Consultee Name	Organisation	Comment	Council (Officers) Response
		endemic, and palpably worse than it was a few years ago. 'Whoever they are working for, it isn't us. Engagement, despite the money thrown at it, is superficial and distrusted. And that, at a deep level, makes this less of a place people will aspire to live.	
Aviva Investors		Our Client supports the aspiration for high quality and inclusive design. As noted in our recent representations in relation to the draft Affordable Housing and Viability SPD, the Council will need to make clear whether scheme viability will influence the Council 's approach to design etc. to ensure the maximum affordable housing can be achieved or whether design is the Council 's top priority where viability constraints are applicable. Where affordable housing is determined to be the top priority, then the role and influence of any Design Review Panel needs to be clarified, as this is likely to differ from schemes where quality is the top priority. Similarly, should instances arise where the Council disagrees any views expressed by the Panel, the Council may wish to include provision for such circumstances in their design policies. Given the need to accommodate significant growth, in particular housing, we agree that the Council should give further consideration to, and confirm in the Local Plan, where tall buildings are acceptable in principle.	These points are noted and will be considered in developing the policies of the Local Plan.
Mrs Juliemma McLoughlin		The Mayor would welcome locally specific policies on good design, including an approach that notes that local character evolves over time and will need to change in appropriate locations to accommodate additional housing provision (draft Policy H2).	This point is noted in drafting the new Local Plan.
		ENHANCING AND PRESERVING OUR HERITAGE	
Ms Lucy Harrison		Please consider less well known or appreciated areas of heritage, for instance in Lea Bridge where a handsome 20s industrial building was recently demolished after having been described as 'awful and derelict' in the planning committee.	This point is noted.

Consultee Name	Organisation	Comment	Council (Officers) Response
Ms Emma Best		There has not been much comment about protecting character, what the character of each area is perceived to be and what any local plan should be sympathetic too. High rises should be avoided at all costs ““ please speak to neighbouring councils about what a failure things like pinnacle point have been!	This point is noted. The Council intends to carry out a Characterisation and Intensification study.
Mr Bob Sharples	Sport England	I would encourage you to look at some of the work Sport England has done with the National Trust which could be useful here.	This is noted in relation to the drafting of the Playing Pitch Strategy
Mr Adrian Stannard	Planning Watch Convenor Civic Society	There is no point in this section if developers are allowed to build monstrous tower blocks with no regard to the history of the area. The heritage economy can be huge and an area like Waltham Forest, in particular Leyton and Walthamstow should be working hard to develop this economy - not bending over backwards to getting developers to try and make it like Ilford or numerous other bland places.	Comment noted.
Mr Daniel Palman	Berkeley Homes (North East London) Ltd	The Council should continue to protect and enhance the Borough’s heritage assets. Heritage led regeneration can play a key part in the redevelopment of areas within the Borough, and the recognition of this is important to the retention of the sustainable redevelopment of the Borough. However, the protection of the historic environment must be balanced with the need to deliver growth. We would encourage the Council to ensure sufficient flexibility is built into future policy to ensure that development for the betterment of the area is not precluded by regimented interpretation of heritage policy.	This point is noted in preparing the new Local Plan.
Mr Tim Brennan	Historic England	We note and support the policy directions, in addition to the accompanying text. We particularly welcome the identification of the potential for heritage assets to provide a catalyst for regeneration, reuse and economic vitality and the focus on heritage at risk. As set out elsewhere in our consultation response, we believe the deliverability of the overall aims of the Plan can be strengthened by ensuring that heritage issues are considered and addressed right through the entire range of policy areas.	This point is noted in preparing the new Local Plan.

Consultee Name	Organisation	Comment	Council (Officers) Response
Gillian Morgan	London Parks & Gardens Trust	What LPGT will look for in the revised policies: 1. strategic policies that protect and conserve historic parks and gardens (registered & locally listed); 2. identification of non-designated heritage assets “ specific policies for those that are known, generic policies to apply as necessary; 3. detailed policies that recognise, protect and enhance their significance; 4. detailed policies which apply not only to development within and adjacent but also which potentially impact on designed views into, as well as from, the landscape and setting, their landscape character and defined significance; 5. commitment to review the local list & add locally important parks & gardens which are valued by the local community; 6. specific consideration of named sites in detailed area policies; 7. site specific policies for heritage assets which require investment to protect or conserve or enhance their significance;	These points are noted in preparing the Local Plan.
Gillian Morgan	London Parks & Gardens Trust	What LPGT will look for in the revised policies: 1. Protection and conservation of the borough’s heritage assets of designed landscapes such as public parks, grounds of historic houses, and sites, churchyards, cemeteries and town squares; 2. proper recognition and consideration of heritage assets and open spaces, and evidence that their status and significance has been given due consideration in forming the strategies and policies set out in the Local Plan, in line with the NPPF; 3. strategies and policies should include not only statutorily and non-statutorily designated assets, but also other local heritage assets; 4. sufficient information should have informed the policies as part of the evidence base such as reference to the GLHER and the London Parks and Garden ‘s Trust Inventory.	These points are noted in preparing the Local Plan.
Gillian Morgan	London Parks & Gardens Trust	LPGT welcomes the Council’s understanding, in principle, that: ‘the distinctive heritage and culture of our Borough provides a framework for delivering growth and change; However, there is no mention of historic parks and gardens in the whole of the Design, Heritage, Culture and Amenities section.	This point is noted.

Consultee Name	Organisation	Comment	Council (Officers) Response
Mr Tim Brennan	Historic England	<p>Historic England has produced a number of advice notes since the publication of the NPPF in 2012 to help in the interpretation and application of national policy and guidance in this area which we would commend to you in the development of the draft Local Plan. These can all be found at https://www.historicengland.org.uk/advice/planning/planning-system/ . In particular, we recommend that Good Practice Advice Note 1 “ The Historic Environment in Local Plans (https://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/) is used to help ensure that a number of key heritage requirements in the NPPF for Local Plans are adequately addressed. These are ‘ An adequate, up to date and relevant evidence base (paragraphs 158 and 169) ‘ A positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment (paragraphs 126 and 157) ‘ Strategic policies to deliver the conservation and enhancement of the historic environment (paragraph 156) ‘ Identification of land where development would be inappropriate because of environmental or historic significance (paragraph 157)</p>	This point is noted.
Mr Tim Brennan	Historic England	<p>We note the nature of the consultation document, and that the Borough Council is at a relatively early stage in its preparations to help produce a new Local Plan. We would however stress that we consider that there is a significant degree of further work that remains to be done to ensure that the Plan properly reflects the requirements of the NPPF in respect of the historic environment. In this work, we would encourage the consideration of heritage all the way through the range of policy issues that the Plan will address over the course of its duration. For example, subjects such as town centres, infrastructure, housing, design and economic development can all have potentially significant and direct impacts on the local historic environment. Ensuring that work in developing a Local Plan reflects the inter-play</p>	This point is noted.

Consultee Name	Organisation	Comment	Council (Officers) Response
		between these areas goes a significant way in delivering the positive strategy for the historic environment required by the NPPF.	
Gillian Morgan	London Parks & Gardens Trust	What LPGT will look for in the revised policies: 1. require developers to refer to the GLHER and the LPGT inventory when drawing up proposals and justify their approach through a heritage impact assessment; 2. require developers to consider design, landscaping and provision of amenity space, etc in new development and how it will contribute to green landscapes of the future, for future residents; 3. ensure quality new open spaces at ground level creating the heritage assets of the future. 4. Ensure that significantly taller buildings do not have a damaging effect on the design of the experience of being within public green spaces 5. Ensure that development which benefits from its proximity to a public open space contributes to its ongoing maintenance; 6. An easily accessible list or map of registered sites and other heritage assets, preferably for the proposals map to identify national and locally listed assets.	These points are noted.
Gordon Turpin	Highams Park Planning Group	The architectural landscape in Higham's Park is varied, so in looking at the character of future development the Plan splits the area into nine Character Areas and character assessments are attached for eight of these areas; please note a character assessment was not prepared for area 8, which encompasses the Aldriche Way housing estate, as the Plan does not envisage that the character of this area should be preserved or replicated. The Plan emphasises the importance of respecting both the established characteristics and those of more recent developments which have created a new vernacular which has proved acceptable. The Plan does not envisage developments in excess of four stories (commercial ground floor, plus three floors of residential).	This point is noted. The Council intends to carry out a boroughwide Characterisation and Intensification Study.
Natalie Szarek	The Community Food Growers Network	There is a lot of very positive work being done in the Borough that deserves to be celebrated. The training kitchen at Leyton Cricket Ground (14.3, 3.7) is a fantastic development (it would be fantastic to	Support noted.

Consultee Name	Organisation	Comment	Council (Officers) Response
		incorporate a kitchen garden into the plans) and the development of Walthamstow Wetlands is a big step in the right direction in terms of protecting green space.	
		PROTECTING AND ENHANCING OUR ENVIRONMENT	
Ms Lucy Harrison		How do we contribute to the Playing Pitch review? Please consider how developing the Waterworks centre and surrounding spaces near Lea Bridge station are contributing to the loss of open spaces and MOL.	This point is noted. The Council intends to publish all the evidence-based studies informing the Plan.
Ms Rachel Summers		I notice that you mention protecting and improving the green spaces, and public access to them. I run forest school sessions on the council nature reserve at Low Hall, giving local children a chance to explore, discover, and create outdoors. This is something in demand from local schools and from local parents. I know that some nearby boroughs are creating opportunities for all local children to experience forest school, and yet this is something that seems to be passing Waltham Forest by. What a shame, when we have the greenest borough north of the Thames, not to make more of the possibility of this provision! Getting children out and active, cutting childhood obesity in a fun and sustainably family friendly way, whilst simultaneously giving them a connection to nature and an understanding and a will to protect it- this all seems a good idea to me. If this were something the council would like to explore further, I 'd be very interested in having that conversation.	This point relates to initiatives best undertaken by schools directly rather than through the Local Plan However this noted in drawing attention to use of the green spaces for educational and recreational activities.
Mr Bob Sharples	Sport England	Sport England supports Waltham Forest in its endeavours in this section.	Support noted.
Ms Abigail Woodman		The Council rightly celebrates the fact that Waltham Forest is one of London's greenest boroughs. Access to nature is critical for social, emotional and physical well-being and must, therefore, be a priority for the council. Nature is, as my nephew said to me 'love, peace and unity for all'; that's not just all people, that's living things. So I	This point is noted.

Consultee Name	Organisation	Comment	Council (Officers) Response
		<p>completely oppose the council's plan to bring public Wi-Fi to Walthamstow wetlands. The wetlands should be a place where people can get away from the speed of modern life, where they learn to reconnect with nature and put the needs of birds and other wildlife ahead of their own needs. We should be encouraging people to watch the light play on water or watch the way birds nest and feed, not pollute the atmosphere with tinny music played from mobile phones. The council must acknowledge the importance of the borough's green spaces and the role they play in making life worth living, and make a firm, unshakeable commitment to protect all green spaces. metropolitan open land and Green Belt must be protected. I welcome the Council's plan to plant 50,000 new trees, but I call on the council to protect the trees already growing in our borough and do more to prevent developers cutting down or damaging mature trees. It is, after all, mature trees and not saplings that do the most to mitigate the effects of climate change.</p>	
Mr Nick Marks		<p>I have seen the new draft local plan is out for consultation. I'd like to have a chat with the appropriate officer to see where pollution issues fit into the planning process. There are brief mentions of noise air quality and contaminated land in the document. Looking at the SPGs on the web we seen to address the problem of air quality and contaminated land but we have no policies on noise.</p>	<p>The document published is not the draft Local Plan, but a 'Direction of Travel document' which seeks to identify the key issues and policy directions being considered at this stage. Further information about the publication of the draft Local Plan will be provided.</p>
Mr Mathew Frith		<p>We support the general direction of ambition and the recognition that the borough hosts populations of species which are nationally and internationally important, for example wildfowl on the Lee Valley reservoirs (inc Walthamstow Wetlands), and the invertebrates in parts of Epping Forest (designated a SAC for stag beetle). We would like to see more explicit measures to address the poor biodiversity quality outside the statutory sites, and an aspiration to deliver a more ecologically cohesive network of green infrastructure across the borough. We would expect an overarching commitment to securing</p>	<p>Support noted.</p>

Consultee Name	Organisation	Comment	Council (Officers) Response
		net gain for biodiversity through the life of the Plan.	
Jeremy Dagley	Corporation of London	<p>The protection strategy referred to above should be based on the mitigation hierarchy of avoid, minimize/mitigate, restore and offset. We would like to see such a strategy as central to Section 15 and it follows that we would also hope that your Council will take up our, Natural England 's and Epping Forest District Council 's invitation to sign up to the Memorandum of Understanding for protecting Epping Forest. Under Section 15 'Protecting and Enhancing our Environment 'the international importance of sites is mentioned in 15.1. However, in this same sub-section, Epping Forest is incorrectly ascribed to the category of 'national importance' . Epping Forest as a Special Area of Conservation (SAC), protected under both the Bern Convention 1979 and the EU Habitats Directive 1992, is of international importance. Epping Forest should be listed under sub-section 15.3 alongside Walthamstow Wetlands. Your Council, as a 'competent authority ', under the Habitats Directive has a legal responsibility to protect this SAC from likely adverse impacts of proposed development projects, including those 'in combination ' with others such as cross-border development. The importance of this responsibility needs to be reflected in the new Local Plan text and policies.</p>	This point is noted.
Chris Baines	Consultation Service Natural England	<p>Lee Valley SPA - The final Local Plan should give great weight to the protection of Lee Valley SPA. As such, it would be beneficial for evidence to be gathered on the potential threats to the integrity of the SPA through planned development, including recreational pressure and hydrological impacts, and the results included in the evidence base. This may then inform the nature of protective policies included within the Local Plan. Long-term visitor monitoring surveys are currently planned at Walthamstow Wetlands, and the outcome of these surveys should be taken into account during the formulation of Local Plan policy, subject to their completion.</p>	This point is noted.
Chris	Consultation	Environment Policies "" consistency with the NPPF - Upon review of	These points are noted.

Consultee Name	Organisation	Comment	Council (Officers) Response
Baines	Service Natural England	<p>Policy Direction 15 ‘Protecting and Enhancing the Environment ‘ of the Direction of Travel (DoT) we would like to highlight a number of important areas which should be addressed within the Local Plan which are not currently referenced within the DoT, and which would increase the degree to which the final Plan may be considered consistent with national policy: i). The policy direction does not make it clear that sites of international important for nature conservation with in the Borough “ namely Epping Forest Special Area of Conservation (SAC) and Lee Valley Special Protection Area (SPA) and RAMSAR site - will be given strict protection through planning policy, as would be consistent with Paragraph 113 of the NPPF. It is our opinion that the final Plan should include specific criteria against which planning applications which may affect the integrity of statutory designated sites will be judged, and that Epping Forest SAC and Lee Valley SPA in particular should be conferred additional protection through Local Plan policy. ii). The final plan should make provisions to ensure that development within the Borough results in a net gain in biodiversity wherever possible, as would be consistent with paragraph 109 of the NPPF. This is not currently reflected within Policy Direction 15. iii). The final plan should make provisions to ensure that loss of irreplaceable habitats such as ancient woodland is avoided, as would reflect paragraph 118 of the NPPF. This is not currently reflected in Policy Direction 15. iv). The final plan should include policy to promote the preservation, restoration and re-creation of priority habitat, as would be consistent with paragraph 117 of the NPPF. This is not currently reflected within Policy Direction 15</p>	
Chris Baines	Consultation Service Natural England	<p>Environment Policies - consistency with Draft London Plan - As is acknowledged within the DoT, the New Waltham Forest Local Plan should be consistent with the emerging London Plan. We note that “ Policy G1 of the current Draft London Plan states that Development</p>	<p>These points are noted for consideration.</p>

Consultee Name	Organisation	Comment	Council (Officers) Response
		<p>Plans should ' identify key opportunities for addressing environmental and social challenges through strategic green infrastructure provision '. The Policy Direction does not refer to green infrastructure, and in order to reflect the London Plan the final Local Plan should identify green infrastructure assets and describe opportunities for strategic green infrastructure projects through the preparation of a green infrastructure strategy. This strategy may then form part of the evidence base going forward. - Policy G5 of the Draft London Plan states that ' Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments'. The final Local Plan could incorporate this measure tailored appropriately to local circumstances, subject to any further revisions in this emerging policy. - Policy G6 of the Draft London Plan states that in developing Development Plan policies, boroughs should identify and protect Sites of Importance for Nature Conservation (SINCs), identify and address areas of deficiency in access to nature, and include policies for the conservation of priority habitats and species (please see the full draft policy for exact wording). The final Local Plan should therefore seek to reflect this policy, subject to any further revisions.</p>	
Chris Baines	Consultation Service Natural England	<p>Epping Forest SAC - The final Local Plan should give great weight to the protection of Epping Forest SAC. The site is particularly sensitive to traffic-related air pollution and recreational pressure, which are both predicted to increase as a result of planned development in the surrounding Districts. As such, in order to ensure that their Local Plans are compliant with the Habitats Regulations (2010) Epping Forest DC, Harlow DC, Uttlesford DC and East Hertfordshire DC have entered into Memorandum of Understanding (MoU) with Natural England and City of London (Conservators of Epping Forest) with the aim of fulfilling the following requirements " i. to collect and analyse data and evidence related to the impacts of proposed development and growth under</p>	These points are noted for consideration.

Consultee Name	Organisation	Comment	Council (Officers) Response
		<p>the Local Plans to provide sufficient and robust evidence on which to base a strategy for the protection of Epping Forest SAC; ii. to commit to prepare a joint strategy, based on relevant available data and evidence and to an agreed timetable; and iii. that the joint strategy will address both the requirement to avoid, or effectively mitigate, adverse impacts on the integrity of the SAC from Local Plan-led development and the requirement to prevent further deterioration of the SAC features. The Strategic Housing Market Assessment for Waltham Forest indicates a housing delivery target of approximately 1,810 units per annum from 2014 to 2039. Whilst the contribution of this new development to air pollution impacts on the SAC is partially dependent on the chosen spatial development strategy, without effective cross-boundary cooperation with other Boroughs it is unlikely that a likely significant effect on the SAC can be ruled-out. This is reflected in the Habitats Regulations Assessment (HRA) of the Draft London Plan which recommends that ‘ The London Plan should direct the London Boroughs (particularly Waltham Forest and Redbridge) to participate as necessary in the traffic and air quality strategy that is in the early stages of being devised for the SAC ‘ (Section 7.6.1), and the London Plan may therefore be amended to reflect this. As such, we hope that LBWF will consider its relationship with the current MoU authorities, and we hope to have the opportunity to discuss this in more detail with members of the planning policy team in the near future.</p>	
Mr Adrian Stannard	Planning Watch Convenor Civic Society	Metropolitan and Green Belt land are of strategic importance to London not just Waltham Forest. Ecosystems do not have regard to artificial boundaries so it is vital these areas resist development pressure as they are part of the future well-being of Londoners.	This point is noted.
Ms Alison		With regard to protecting the environment (15), I welcome point 1	This point is noted.

Consultee Name	Organisation	Comment	Council (Officers) Response
Griffin		'continuing to resist the inappropriate loss of .. ' and would welcome this statement being made and implemented as strongly as is possible, because it really is vital there is no more threat of any sort of development on the green space that we have. Connected with this, option 6 under Growth Options (17) I would strongly prefer the council to rule out entirely (and articulate why).	
Mr Philip Herlihy		All very well, yet the proposals for Walthamstow Town centre involve a severe loss of an open space which gives the Town Centre its character. How can we reconcile the aspirations listed above with what seems to be a willing surrender of open space for the benefit of corporate developers rather than the residents you're supposed to be working for?	This point is noted.
Ewan Coke	LB Redbridge	The protection of important open spaces including RAMSAR, Natura 2000 sites, and SSSIs is supported as these have national importance and are enjoyed by all residents in the sub-region. The DoT also suggests opportunities to improve and enhance access to Epping Forest, part of which lies within Redbridge, and we would like to discuss any plans you have in this direction. The development of sports hubs that may be used by Redbridge residents is also supported.	Support noted.
Alice Roberts	Campaign to Protect Rural England (CPRE)	It is worth noting that, as well as being vitally important for the borough's residents, these sites are strategically important for all of London. The term 'inappropriate loss ' of Green Belt and Metropolitan Land and open spaces needs to be strengthened and should read: 'Continuing to resist the loss of .. ' (delete inappropriate). This section should also note that there will be no development on the Thames Water Depot site . There is a clear case for returning this site to park / green space to ensure the width of the park at this point is not narrowed to the point where the park could eventually be cut in half. It should also be clear that there will be no opportunity to develop the Water Works Centre site as this also is	These points are noted.

Consultee Name	Organisation	Comment	Council (Officers) Response
		encroachment into the park at a point where the breadth of the park is being reduced. The council will be familiar with these sites however we have included a google earth image here to show how significant the Thames Water Depot site, in particular, is to maintaining the overall openness of the wider stretch of Metropolitan Open Land which surrounds it.	
Chloe Rose	South East England Regional Office RSPB	The RSPB has noted that it is the authority 's intention to include a policy in the plan in respect of 'protecting and enhancing the Borough's biodiversity, especially where habitats, species and sites are recognised at international, national, regional and local level ' (page 55). We welcome this. At the next stage of drafting, we would expect to see this expanded as appropriate to include specific reference to the Lee Valley Special Protection Area (SPA) and other protected land, and the policies tailored to the requirements of the legislation under which the protective designations are made.	This point is noted in preparing the Local Plan.
Gerry Stevens		Metropolitan Open Land and Green Belt are strategically important green sites for the whole of London, helping ensure London uses its land efficiently; and that all Londoners have access to the ecosystem services needed to make it habitable. Many protected sites also provide city-wide leisure, sports or other amenity for all Londoners, not just the borough's residents, and any assessment of the importance of these sites must take this into account. Additionally, development of brownfield land on protected sites must be limited " as per NPPF and London Plan policy "" to the existing built footprint and this policy should be clearly reflected in the new Local Plan. The new Local Plan should specifically exclude any development on the Thames Water Depot site which should be returned to parkland. It should also exclude any development on the WaterWorks centre site which is clearly part of the park. Kindly note that I was born in Chingford in 1947. My family lived there from 1933 onwards and my mother until 2004 when she died at the age of 99. One set of	These points are noted for consideration in drafting the Local Plan policies relating to the Green Belt/MOL

Consultee Name	Organisation	Comment	Council (Officers) Response
		<p>grandparents lived in Woodford and a cousin in Highams Park. My sister-in-law still lives in Chingford. My family has 6 graves in Chingford Mount Cemetery and I will have my ashes interred in the grounds of Chingford Old Church when the time comes. So please do not take what MOL/Green Belt land is left either from Chingford or the rest of Waltham Forest.</p>	
Carol Fisk		<p>Metropolitan Open Land and Green Belt are strategically important green sites for the whole of London, helping ensure London uses its land efficiently; and that all Londoners have access to the ecosystem services needed to make it habitable. Many protected sites also provide city-wide leisure, sports or other amenity for all Londoners, not just the borough's residents, and any assessment of the importance of these sites must take this into account. Additionally, development of brownfield land on protected sites must be limited " as per NPPF and London Plan policy " to the existing built footprint and this policy should be clearly reflected in the new Local Plan. The new Local Plan should specifically exclude any development on the Thames Water Depot site which should be returned to parkland. It should also exclude any development on the WaterWorks centre site which is clearly part of the park.</p>	<p>These points are noted for consideration in drafting the Local Plan policies relating to the Green Belt/MOL</p>
Keith Bilton		<p>Metropolitan Open Land and Green Belt are strategically important green sites for the whole of London, helping ensure London uses its land efficiently; and that all Londoners have access to the ecosystem services needed to make it habitable. Many protected sites also provide city-wide leisure, sports or other amenity for all Londoners, not just the borough's residents, and any assessment of the importance of these sites must take this into account. Additionally, development of brownfield land on protected sites must be limited " as per NPPF and London Plan policy " to the existing built footprint and this policy should be clearly reflected in the new Local Plan. The new Local Plan should specifically exclude any development on the</p>	<p>These points are noted for consideration in drafting the Local Plan policies relating to the Green Belt/MOL</p>

Consultee Name	Organisation	Comment	Council (Officers) Response
		Thames Water Depot site which should be returned to parkland. It should also exclude any development on the WaterWorks centre site which is clearly part of the park.	
Robert Gowar		Metropolitan Open Land and Green Belt are strategically important green sites for the whole of London, helping ensure London uses its land efficiently; and that all Londoners have access to the ecosystem services needed to make it habitable. Many protected sites also provide city-wide leisure, sports or other amenity for all Londoners, not just the borough's residents, and any assessment of the importance of these sites must take this into account. Additionally, development of brownfield land on protected sites must be limited " as per NPPF and London Plan policy " to the existing built footprint and this policy should be clearly reflected in the new Local Plan. The new Local Plan should specifically exclude any development on the Thames Water Depot site which should be returned to parkland. It should also exclude any development on the WaterWorks centre site which is clearly part of the park.	These points are noted for consideration in drafting the Local Plan policies relating to the Green Belt/MOL
Jasia Warren		Metropolitan Open Land and Green Belt are strategically important green sites for the whole of London, helping ensure London uses its land efficiently; and that all Londoners have access to the ecosystem services needed to make it habitable. Many protected sites also provide city-wide leisure, sports or other amenity for all Londoners, not just the borough's residents, and any assessment of the importance of these sites must take this into account. Additionally, development of brownfield land on protected sites must be limited " as per NPPF and London Plan policy " to the existing built footprint and this policy should be clearly reflected in the new Local Plan. The new Local Plan should specifically exclude any development on the Thames Water Depot site which should be returned to parkland. It should also exclude any development on the WaterWorks centre site which is clearly part of the park.	These points are noted for consideration in drafting the Local Plan policies relating to the Green Belt/MOL

Consultee Name	Organisation	Comment	Council (Officers) Response
Jo Daly		Metropolitan Open Land and Green Belt are strategically important green sites for the whole of London, helping ensure London uses its land efficiently; and that all Londoners have access to the ecosystem services needed to make it habitable. Many protected sites also provide city-wide leisure, sports or other amenity for all Londoners, not just the borough's residents, and any assessment of the importance of these sites must take this into account. Additionally, development of brownfield land on protected sites must be limited " as per NPPF and London Plan policy " to the existing built footprint and this policy should be clearly reflected in the new Local Plan. The new Local Plan should specifically exclude any development on the Thames Water Depot site which should be returned to parkland. It should also exclude any development on the WaterWorks centre site which is clearly part of the park.	These points are noted for consideration in drafting the Local Plan policies relating to the Green Belt/MOL
Caroline Day		Metropolitan Open Land and Green Belt are strategically important green sites for the whole of London, helping ensure London uses its land efficiently; and that all Londoners have access to the ecosystem services needed to make it habitable. Many protected sites also provide city-wide leisure, sports or other amenity for all Londoners, not just the borough's residents, and any assessment of the importance of these sites must take this into account. Additionally, development of brownfield land on protected sites must be limited " as per NPPF and London Plan policy " to the existing built footprint and this policy should be clearly reflected in the new Local Plan. The new Local Plan should specifically exclude any development on the Thames Water Depot site which should be returned to parkland. It should also exclude any development on the WaterWorks centre site which is clearly part of the park.	These points are noted for consideration in drafting the Local Plan policies relating to the Green Belt/MOL
Dave Wetzel		Metropolitan Open Land and Green Belt are strategically important green sites for the whole of London, helping ensure London uses its land efficiently; and that all Londoners have access to the ecosystem	These points are noted for consideration in drafting the Local Plan policies relating to the Green Belt/MOL

Consultee Name	Organisation	Comment	Council (Officers) Response
		<p>services needed to make it habitable. Many protected sites also provide city-wide leisure, sports or other amenity for all Londoners, not just the borough's residents, and any assessment of the importance of these sites must take this into account. Additionally, development of brownfield land on protected sites must be limited "" as per NPPF and London Plan policy "" to the existing built footprint and this policy should be clearly reflected in the new Local Plan. The new Local Plan should specifically exclude any development on the Thames Water Depot site which should be returned to parkland. It should also exclude any development on the WaterWorks centre site which is clearly part of the park.</p>	
Ms Gillian Morgan	Capital growth	<p>Capital Growth would like to see the new local plan look more holistically at the role of food in creating a healthy community. The Plan should avoid the narrow definition of food growing as allotments and encourage different scales of growing by making best use of the Green Belt and other greenspace through to encouraging space within school grounds. Policies should cover all aspects of access to healthy food from growing through to retail with support for local shops and temporary market stalls and restrictions on availability of unhealthy food close to locations used by young people.</p>	This is noted.
Ms Gillian Morgan		<p>We would welcome policies which: Bring underused Green Belt into productive use growing local food. Encourage the temporary use of vacant sites and land awaiting development. Require all development to incorporate measures that will contribute to on-site sustainable food production (from productive landscaping through to spaces suitable for food growing) commensurate with the scale of development.</p>	These points are noted.
Abigail Woodman	Save Lea Marshes	<p>I have not read the LVRPA 's final response to the consultation (which I urge you to publish on your website as soon as practicable), but I was able to see a draft of the letter at the LVRPA's Regeneration and Planning Committee Meeting that took place on 14 December. In that</p>	These points are noted for consideration.

Consultee Name	Organisation	Comment	Council (Officers) Response
		<p>draft, the LVRPA proposed submitting two sites in response to your call for sites. Both of these sites are Metropolitan Open Land (MoL) and we are writing to state that we object, in the strongest possible terms, to any use of the sites for development which leads to the loss of open land. MoL must be protected and Save Lea Marshes objects to any attempts to remove the MoL designation from land within the Lee Valley Regional Park specifically and within the borough more generally. This position is supported by thousands of local people; and I refer you to the petition signed by over 5000 people in response to the first draft of the Lea Valley Eastside Vision, which called on the Council not to rezone the land around the Waterworks for housing (https://you.38degrees.org.uk/petitions/stop-the-council-s-plan-to-build-on-leyton-marshes). We therefore are ask you to reject both sites.</p>	
Roger Payne		<p>Metropolitan Open Land should remain as open land and not be re-designated or built on. I will oppose any such plans.</p>	<p>Comment noted.</p>
Julian Chyne		<p>Additionally, it is important development of brownfield land on protected sites be limited “as per NPPF and London Plan policy “ to the existing built footprint. Brownfield sites which have been created, such as car parks, to serve leisure and recreation purposes, must be maintained as such and not converted into private developments. The new Local Plan should exclude any development on the Thames Water Depot site which should be returned to parkland. This is part of the Lea Valley Regional Park, which is supposed to be a Green Lung for the region and not just for Waltham Forest. The Lea Valley Park provides a vital resource for the Borough and needs to be protected for future generations. It should be preserved and extended wherever possible. The Thames Water site sits next to the Middlesex Filter Beds nature reserve. The Local Plan should also exclude any development on the Waterworks Centre site which is also part of the Park and forms an important buffer to the Essex Filter Beds Nature Reserve.</p>	<p>These points are noted for consideration.</p>

Consultee Name	Organisation	Comment	Council (Officers) Response
		<p>Both the Waterworks site and the former Thames Water Depot site are Metropolitan Open Land. Waltham Forest has a once in a lifetime opportunity to consolidate and improve the green spaces of the Lea Valley Regional Park for future generations. Metropolitan Open Land and Green Belt are strategically important not just for the local area. Green sites are part of a wider network making London habitable. Protecting this land helps ensure London uses its land efficiently. Protected sites provide leisure, sports or other amenity for Londoners, not just the borough's residents. This regional dimension needs to be taken into account.</p>	
Mrs Claire McLean		<p>As above, we would suggest that the Lee Navigation be recognised here as an asset within the borough. Biodiversity The waterways and their towpaths provide a haven for wildlife and vegetation, as well as being used as bat 'feeding corridors'. Local policy should require that developments adjacent to the canal respect and enhance the biodiversity of the waterway environment.</p>	Points noted.
Mrs Claire McLean	Area Planner Canal & River Trust	<p>Surface Water Drainage: The waterways can sometimes accept clean surface water drainage from adjacent developments, subject to an agreement with the Trust's Utilities team. We would therefore ask that this be included as a potential option for developments to explore. As the Lee Navigation has links to all policy areas within the Local Plan, it is unclear where a waterways policy would sit. However, we would suggest that this section could be the main reference point, with additional references through the rest of the document. We note that the current Development Management policies document included a policy on waterways within Policy DM34 "Water, which we didn't think was wholly recognising the significance and varied benefits of the Lee Navigation. This Waterways policy at Part E also included a blanket requirement for development to include buffer zones around rivers and watercourses, and we do not necessarily support this, as it can prevent design of waterside development fully</p>	Points noted.

Consultee Name	Organisation	Comment	Council (Officers) Response
		embracing the waterspace and creating unloved, unused spaces. We would like to see the specific blanket requirement removed so that each application can be considered on its own merits within the context of the area.	
Transport for London		Policy Direction No. 1, which resists the inappropriate loss of the Green Belt, MOL and open spaces, accords with the Mayor of London 's pledge (and policies in the Draft London Plan) to protect such land. In order to deliver the growth that London needs, this underlines, once again, the importance of delivering high-density housing development in sustainable and accessible locations around transport hubs and in town centres.	Comment noted.
Keira Murphy	Planning Specialist Environment Agency	This section demonstrates how much you value the green spaces and parks across the borough. There is emphasis on protecting designated sites, for example, Walthamstow Wetlands is a RAMSAR, Natura 2000 and an SSSI. Although we can see the value of the policy directions 1, 2, 3 and 4 we think there is an over-emphasis on open space and designated habitats rather than planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure (as outlined in paragraph 114 of the National Planning Policy Framework). Green infrastructure encompasses a whole range of designated and non-designated habitats and green spaces. It's useful to note that in the London Plan Chapter 2: London 's Places, the term green infrastructure is stated as referring to "a network of all green and open spaces together with the Blue Ribbon Network of rivers and waterways." Watercourses and green infrastructure There is, for example, no recognition of watercourses in the borough and their importance to biodiversity. Watercourses provide biodiversity habitat for water-based and land-based wildlife and also provide valuable recreational spaces for people and can improve health and wellbeing. Watercourses form an important part of green infrastructure providing habitat connectivity	These points are noted in drafting the Local Plan policies.

Consultee Name	Organisation	Comment	Council (Officers) Response
		<p>and wildlife corridors. Where they are enhanced and restored, rivers and their corridors can also increase the value of developments, provide scenic views, amenity spaces and improve climate change resilience. The Local Plan should identify and recognize the importance of watercourses and outline how they should be managed and improved in the future (in line with paragraph 114 of the NPPF and policy 7.28 of the current London Plan (2016)). For example, policy 7.28 of the current London Plan states that within LDFs boroughs should identify any parts of the Blue Ribbon Network where particular biodiversity improvements will be sought. Within Waltham Forest, there are the following main rivers: , · Dagenham Brook , · Lee Flood Relief Channel , · Lee Navigation , · Ching Brook The water bodies and their classification are illustrated in the table below [please see their submission for table - attached] These watercourses are identified in the Thames River Basin Management Plan (2009, 2015). The Thames RBMP is the plan setting out how to achieve good status on all waterbodies based on the Water Framework Directive (2000). We can only achieve the improvements needed through partnership working, e.g. river restoration projects or interventions through the planning system. The Thames RBMP is the most up-to-date evidence there is on the overall water quality of our rivers and groundwater and can be used to monitor the progress of improvement plans. These are heavily modified watercourses facing many pressures. The main issues facing these waterbodies are drainage misconnections, pollution from road and urban run-off and Combined Sewer Overflows (CSOs). CSOs are sewers that are designed to collect rainwater runoff, domestic sewage, and industrial waste water in the same pipe. They can cause pollution when storm water levels cause flows to exceed the capacity of the treatment facility, resulting in overflow of untreated waste water into nearby rivers and streams. The fact that these watercourses are heavily modified (e.g. concrete</p>	

Consultee Name	Organisation	Comment	Council (Officers) Response
		<p>channels, banks and walls) also affects the morphological processes of the river, often preventing natural processes taking place which would normally attract a diverse range of plant species and wildlife. The Thames RBMP outlines the role that planning and development can have in enhancing and restoring these watercourses. The actions identified for the watercourses in Waltham Forest include softening of hard edges, removal of weir structures, opening up culverts, and managing riparian and marginal vegetation to improve habitat value and diversity. A full list of the WFD action measures for each waterbody can be made available on request. We also have the Catchment Data Explorer web tool which you can use to download WFD data on any waterbody. For Waltham Forest, we recommend there is a strong policy direction on restoring and enhancing watercourses recognizing their value as part of a green infrastructure network. We recommend the watercourses are mapped and information provided on their current WFD status and measures needed to enhance them. The Local Plan should include a strategic approach to improving watercourses and specific policy requirements for developments impacting on or in close proximity to a watercourse (see the appendix for further information on this). It may also help to consider a coordinated approach to improving watercourses as part of a green infrastructure network with bordering boroughs that also receive these watercourses. Although we welcome policy direction 2 supporting the provision of new open space in developments, we think this should go further to include green infrastructure in general. The provision of green spaces within developments could encompass a wider range of benefits such as enhanced river corridors and sustainable drainage systems. These can have a positive impact on drainage and help adapt to climate change, as well as encourage wildlife.</p>	
Keira	Planning	Conservation designations: Notwithstanding the advice above on	These points are noted in drafting the Local Plan

Consultee Name	Organisation	Comment	Council (Officers) Response
Murphy	Specialist Environment Agency	<p>watercourses and the recognition of non-designated habitats and green spaces, we do support a policy direction to protect designated conservation sites including Natura 2000 and SSSIs (i.e. policy direction 4). Natura 2000 protected sites are made up of Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) and originate from the Habitats Directive and Birds Directive respectively. SSSIs are notified under the Wildlife and Countryside Act 1981, and the provisions for the protection and management of SSSIs is covered by Countryside and Rights of Way Act 2000 (in England and Wales). The local plan mentions Walthamstow Wetlands and its designation, but should also address other protected sites within Waltham Forest, such as Walthamstow Marshes SSSI and Epping Forest (SSSI and SAC, including part of the Ching Brook catchment and Highams Park Lake). It is critical that these designated areas are protected through planning policy to ensure that they are protected from impacts of development. Protection is also needed for Local Wildlife Sites (LWS) through local policy. These are only offered protection through the planning system and the NPPF does not offer sufficient protection on its own. Specific policy mention for the protection of sites of local ecological importance including LWS should be included to ensure that these sites are not lost through inappropriate development. It should be specified how they will be protected.</p>	policies.
Aviva Investors	Aviva Investors	The adopted Local Plan will need to make clear the circumstances in which loss of open space is considered appropriate, for example, where this is required to achieve sustainable growth in key regeneration locations to come forward.	This point is noted in preparing the new Local Plan.
Mrs Juliemma McLoughlin	Greater London Authority	As stated above, the Mayor strongly supports the approach to protect the Green Belt and MOL and other open spaces. The 2017 London SHLAA identifies sufficient land to meet London's housing need without the need to de-designate the Green Belt.	This point is noted.
Mrs	Greater London	The draft new London Plan introduces an Urban Greening Factor	This point is noted.

Consultee Name	Organisation	Comment	Council (Officers) Response
Juliemma McLoughlin	Authority	(UGF) at Policy GS Urban greening. Boroughs should develop an UGF to identify the appropriate amount of urban greening in new developments.	
Andrew Haughey	Capital & Regional	The adopted Local Plan will need to make clear the circumstances in which loss of open space is considered appropriate, for example, where this is required to achieve sustainable growth in key regeneration locations to come forward.	This point is noted in preparing the new Local Plan.
Natalie Szarek	The Community Food Growers Network	We would like to see a firm commitment to protecting green and open spaces in the borough, with a particular emphasis on food growing spaces “ as these spaces have a positive effect on health, education, skills, employment and community cohesion. Policy Proposal: Waltham Forest Council will identify and safeguard land and infrastructure for commercial food production and community gardening, including allotments, parks, orchards, schools and large commercial small scale glass houses. Local Authorities to make accessible a public register of available land e.g. park land, housing estates, brownfield sites or temporarily available sites and to administer a list of interested parties looking for land for production and marketing of food for London.	This point is noted in preparing the new Local Plan.
		ENSURING CLIMATE CHANGE RESILIENCE	
Ms Ros Bedlow		Improving the energy efficiency of existing housing is a vital part of carbon emission reduction. Producing at least some food locally increases resilience to climate change, as increasingly extreme weather conditions can lead to shortages and price increases. Some way needs to be found to discourage people from paving over their front gardens. The increase in CPZs has the opposite effect, with people now having the double whammy of higher insurance, and the cost of parking vouchers. At the very least, the use of permeable paving, and partial paving, should be encouraged.	This point is noted in preparing the new Local Plan.

Consultee Name	Organisation	Comment	Council (Officers) Response
Ms Alison Griffin		I think there are good community partner organisations who the council collaborates with and with mutual support - eg Organiclea, HEET - and this could be mentioned as part of the council's strategic approach going forward (even if the community organisations aren't named).	This point is noted – in particular, the role of local organisations in addressing climate change.
Thames Water Utilities Ltd		The Environment Agency has designated the Thames Water region to be "seriously water stressed" which reflects the extent to which available water resources are used. Future pressures on water resources will continue to increase and key factors are population growth and climate change. Water conservation and climate change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water supports the council with regards to the policy direction specifically point 4 'working with utility companies and other stakeholders on ensuring water and energy efficiency'. Thames Water support the mains water consumption target of 110 litres per head per day as set out in the NPPG (Paragraph: 015 Reference ID: 56-015-20150327) and this should be included within a Policy in the new Local Plan.	Support noted.
Ewan Coke		Ensuring the borough is resilient to climate change and the delivery of sustainable development to reduce emissions and mitigate the effects of climate change is also a supported policy direction. Redbridge has also drafted and consulted on a new Air Quality Action Plan (2017-2022) and we believe there needs to be a consistent cross-borough approach on air quality.	Support noted. Also noted is LB Redbridge's new Air Quality Action Plan (2017-2022).
HHGL Ltd		Need to encourage existing businesses to be more sustainable in their operations and practices.	Point noted.
Mrs Claire McLean	Area Planner Canal & River Trust	Encouraging active and sustainable transport within the Borough to support carbon dioxide and particulate reduction and promote air quality improvement is supported. We also seek to strengthen this	Support noted.

Consultee Name	Organisation	Comment	Council (Officers) Response
		<p>commitment, particularly through the use of waterway towpaths. Waterways can be used for heating and cooling of buildings, and we have been involved in many successful projects on our network, where developments have found the system to be more efficient than air source pumps. We would therefore request that the Local Plan include reference for this for developers who may wish to explore this technology.</p>	
Transport for London		<p>TfL CD agrees generally with the proposed policy directions. We intend our developments to be of the highest standards of design and will be working closely with the Mayor of London 's Design Advocates to help us achieve this. The Plan will need to encourage high density development (potentially including tall buildings) in town centres, near transport hubs and in other accessible and sustainable locations. There is a strong 'place making ' argument in favour of tall buildings at and close to public transport hubs. This maximises density in the most accessible / sustainable locations and, therefore, optimises housing provision in the borough. It can also provide a landmark which aids way finding and promotes the use of public transport. This should be recognised in Local Plan policies.</p>	<p>This point is noted in preparing the new Local Plan policies.</p>
Keira Murphy	<p>Planning Specialist Environment Agency</p>	<p>We welcome policy direction 5 to work with us and others on flood impact and mitigation. Along the Lea Valley and Ching Brook there are areas of Flood Zone 2 and 3 (medium and high risk of fluvial flooding). The first initial step for Waltham Forest to understand the flood risk across the borough is a Level 1 Strategic Flood Risk Assessment (SFRA). An SFRA is an essential part of the supporting information for a Local Plan and is a requirement outlined in the NPPF paragraphs 99-102. The Level 1 SFRA will enable you to undertake a Sequential Test of any growth areas/strategic site allocations to determine whether development can be directed to areas of lowest flood risk first. If following the Sequential Test however there is insufficient land available (reasonably available sites) in areas of lowest flood risk</p>	<p>The points made are noted.</p>

Consultee Name	Organisation	Comment	Council (Officers) Response
		<p>(Flood Zone 1) you would need to undertake a Level 2 SFRA for any growth areas/sites proposed in Flood Zones 2 and 3. The Level 2 SFRA will help demonstrate the Exceptions Test and whether the sites proposed are deliverable and feasible taking the level of flood risk into account. SFRAs will need to consider the impact of climate change in any assessment following our online guidance on climate change allowances. Please be aware that other boroughs may have already carried out assessments based on the latest climate change allowances so it is worth investigating this to avoid unnecessary work. We can also provide you with information on flood models we are re-running with the climate change allowances. The Level 1 (and where necessary Level 2) SFRA should inform a strong policy on flood risk directing inappropriate development away from areas of flood risk in the borough. This should require new development to seek a reduction in flood risk to existing communities where possible. This should also specify that flood risk mitigation measures and built-in resilience should be designed taking climate change into account for the lifetime of any development (including a reference to our climate change allowance guidance). We can provide further advice on this as the Local Plan progresses. If the Level 1 SFRA identifies areas of Flood Zone 3b (functional floodplain) these should be safeguarded from development and the Local Plan should consider how flood storage can be protected and maximized across the borough. The policy should specify that financial contributions may be sought flood mitigation or flood defences. In this regard the Local Plan should highlight areas where flood defences need to be improved or built and should investigate opportunities to deliver these works through redevelopment in the area. All sources of flood risk should be considered. Policy on flood risk should also address the risk of local surface water flooding, for example. The SFRAs will be the basis on which local policies to address the risk of surface water flooding can</p>	

Consultee Name	Organisation	Comment	Council (Officers) Response
		<p>be developed and a requirement to incorporate Sustainable Drainage Systems in developments will help to alleviate/reduce this type of flood risk. Work is currently on going to investigate natural flood management opportunities along the Ching Brook, with the aim of reducing flood risk downstream. Although at an early stage it would be beneficial if the Local Plan could support this scheme and identify it as environmental infrastructure that may require financial contributions from developments or strategic partnership funding.</p>	
Keira Murphy	Planning Specialist Environment Agency	<p>Although there is a policy direction on working with utility companies on ensuring water and energy efficiency in policy direction 4, there was no specific policy direction tackling water quality. This is mentioned in the introduction in this section (paragraph 16.2) alongside improving air quality. 'Water quality ' and the provision of infrastructure for wastewater is listed as one of the strategic priorities that should be considered in Local Plans (see NPPF paragraph 156). Local Authorities should work with providers to assess the quality and capacity of infrastructure for water supply, wastewater and its treatment (NPPF paragraph 162). London Plan policy 5.14 'Water quality and wastewater infrastructure ' requires Local Authorities to 'identify infrastructure requirements ' for Local Plans. If there is no planned approach in Local Plans to ensure there is sufficient capacity in the wastewater network to accommodate proposed development, there is a risk that water quality in our rivers and groundwater will deteriorate and impact on the health of our environment. The Thames RBMP provides the evidence for the current status of waterbodies in the Thames catchment, and sets the overarching objectives and measures for reaching the Water Framework Directive targets. As mentioned already, watercourses in Waltham Forest are failing to reach good ecological status as a result of drainage misconnections and CSOs. In the wider Thames catchment, watercourses that receive discharges directly from Sewage Treatment Works are at risk from</p>	The points made are noted.

Consultee Name	Organisation	Comment	Council (Officers) Response
		<p>poor water quality if the STWs are not able to cope with the demands placed on them. Sewerage capacity is a significant issue for Waltham Forest (see Thames Water London Model “ Storage Utilisation 2050 map in appendix). Deephams Sewage Treatment Works (STWs) in Enfield and Beckton STWs in Newham both serve existing communities in the borough. Expansion works have been undertaken to increase capacity in line with predicted population growth in the area until 2021 and 2026 respectively. Consideration will need to be given to the ability of the water and wastewater infrastructure to cope with any future growth in Waltham Forest. We strongly recommend you liaise with Thames Water from the earliest opportunity to ascertain whether there is enough capacity in the existing sewerage network and wastewater treatment works to serve new development in your borough. Additional capacity may be required to serve increased housing numbers. Where this is the case Local Authorities should work with water companies and neighbouring boroughs to understand the potential impact increased development would have on the receiving water environment, and the practicalities for Thames Water to provide the necessary upgrades. A Water Cycle Study or Water Infrastructure Management Strategy could be carried out to assess the borough’s water infrastructure. It would help determine how water and waste water should be managed to move towards more sustainable development, and how existing developments could be retrofitted to achieve water efficiency. Any assessments or information gathered needs to be clearly evidenced so it is clear how this issue has been considered to inform your Local Plan and Sustainability Appraisals/Integrated Impact Assessments. Green infrastructure, natural flood management and sustainable drainage measures can also play a part in improving water quality in the borough.</p>	
Keira	Planning	We support policy direction 4 to work with utility companies on	The points made are noted.

Consultee Name	Organisation	Comment	Council (Officers) Response
Murphy	Specialist Environment Agency	<p>ensuring water and energy efficiency. Waltham Forest is located in an area of serious water stress because there are limited water resources in the local area and high and growing demand for water and as such this needs to be recognised as a major issue for the borough. Water resources are predicted to be affected by climate change so there should be a link in the Local Plan between water efficiency, climate change mitigation and carbon reduction policies for the borough. For example, inefficient use of water can lead to unnecessary carbon emissions. Water use accounts for 27 percent of all carbon emissions from our homes. In addition, non-households count towards 29 percent of water consumption and therefore further water and carbon savings can be made. Climate change could increase pressure on water resources in the future, for example, a drop in annual river flow could result in a reduction of water available for abstraction in the Thames catchment. Water efficiency standards can also help deliver objectives of the Thames River Basin Management Plan (RBMP). The RBMP sets out the actions required to protect and improve the water environment in line with requirements of the EU Water Framework Directive (WFD). Local authorities have a duty to have regard to RBMP's . The Thames RBMP contains an action that requests local authorities to seek the use of water efficiency standards in new residential development, and BREEAM standards for non-residential development where local evidence supports the need. We recommend the following standards are considered as part of policy approaches to water efficiency: Supporting the London Plan water efficiency standard for residential development for mains water consumption of 105 litres per head per day or less (this supports the 'optional requirement ' in Part G of the Building Regulations). This can be achieved easily with existing technology and at very little extra cost. Setting a water efficiency standard for new non-household development, including refurbishments, such as BREEAM (BRE</p>	

Consultee Name	Organisation	Comment	Council (Officers) Response
		<p>Environmental Assessment Method) ‘Excellent ‘ with a maximum number of ‘water credits ‘1. Alternatively buildings could meet the ‘best practice ‘ level of the AECB (Association for Environment Conscious Building) Water Standards. The provision of target figures for new developments, will allow progress to be measured while delivering the plan. There are additional benefits of water efficiency standards. For some sewerage catchments achieving the water efficiency target may help to manage the increase in effluent flows generated as the result of proposed growth. This could reduce infrastructure and sewage treatment costs as the volume of effluent requiring transfer and treatment is lower. We think policy direction 3 on supporting sustainable design, materials and construction methods should detail how developments can do this to achieve climate change resilience. Improvements to water quality, flood risk and biodiversity can all be achieved with Sustainable Drainage Systems as road run-off is a major issue for some watercourses in the borough.</p>	
Aviva Investors		<p>Our Client supports the aspiration to introduce proactive interventions, into new developments, to enable a more sustainable low carbon future. However, the Council will need to be ensure the interventions proposed are realistic, based on present day best practice, and do not place unnecessary additional costs on development. For example, the heating requirements of retail development differs significantly from residential development. As such, it should not be assumed that connection to a district heating network is a sustainable solution for all developments. Such matters should be considered on a scheme by scheme basis and the Local should seek to ensure that this flexibility is explained within the policy wording.</p>	This point is noted.
Mrs Juliemma McLoughlin	Greater London Authority	<p>The draft and emerging London Plans set out policies to support the provision of sustainable physical infrastructure across London, including digital, energy, water and transport. The south west of the</p>	This point is noted.

Consultee Name	Organisation	Comment	Council (Officers) Response
		borough is identified as a heat network priority area. A few areas in the borough are also identified as Air Quality Focus Areas.	
Andrew Haughey	Capital & Regional	Our Client supports the aspiration to introduce proactive interventions, into new developments, to enable a more sustainable low carbon future. However, the Council will need to ensure the interventions proposed are realistic, based on present day best practice, and do not place unnecessary additional costs on development. For example, the heating requirements of retail development differs significantly from residential development. As such, it should not be assumed that connection to a district heating network, is a sustainable solution for all developments. Such matters should be considered on a scheme by scheme basis.	This point is noted.
Natalie Szarek	The Community Food Growers Network	Tree planting initiatives are a positive step, but this cannot replace efforts to preserve mature trees from being cleared. More power needs to be given to local communities to make decisions about protecting existing trees. This also applies to protecting green spaces- determining what is an "exceptional" case in terms of building on green spaces can't be a unilateral decision by the Council. We would like to see the Local Plan to give a clear power to local residents to pull the plug on developments which would result in felling trees, destroying biodiversity or eliminating/encroaching on green spaces. The plan must explicitly state the criteria under which 'exceptional circumstances' are to be defined and assessed. In addition, for such a fundamental shift in policy, clear procedures for community consultation and ratification need to be included. Policy Proposal: Waltham Forest Council will partner with food production enterprises and community gardens in local forums to implement the 'London Food Strategy ' (2006), 'Cultivating the Capital ' (2010) and the 'Milan Urban Food Policy Pact ' (2015). Policy Proposal. Waltham Forest Council will support food producers by investment through Section 106 and the Community Infrastructure Levy, specifically to support	Points made are noted.

Consultee Name	Organisation	Comment	Council (Officers) Response
		food growing activities to take place in lands held or acquired by private bodies for 'development '. Examples include the establishment of mini-allotments in housing estates, Community Asset Transfer, and rent reduction for initial set period.	
Tim Brennan	Historic England	The growth options identified do not explicitly identify where the boundaries of the proposed growth hubs or town centres would lie. It is not clear the criteria that have been (or will be) used to identify growth hub locations. A number of those indicated on the maps are already designated as conservation areas. This status (together with accompanying character appraisals/management plans) should be considered as part of the selection process, as well as in shaping new development proposals.	The Council is carrying out further work to assess growth capacity in the identified areas/hubs. Boundaries of these areas will be defined in the Draft Plan. The Council notes the need to consider (together with other planning factors) the impact of development proposals on existing heritage assets in these areas.