

HPPG Comments on LP2 (Regulation 19) Site Allocations Consultation

SA59 - 472-510 Larkshall Road and James Road (yard)

Do you consider that the Local Plan Complies with the Duty to co-operate?

Yes

Do you consider that the Local Plan is Legally compliant?

Yes

Do you consider that the Local Plan is Sound?

No

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

This submission is from the Highams Park Planning Group. We are the designated Neighbourhood Development Forum for the Highams Park Area.

The Highams Park Planning Group considers this site allocation within the Local Plan to be unsound, as the inclusion of a new station entrance is unwanted and unnecessary and will cause development on the site to be of a height and density that will completely change the much loved 'village character' of Highams Park District Centre.

Our grounds for this allocation being unsound are, as follows:

1. To meet the housing targets proposed for this site, and the inclusion of a new station entrance station will require building heights of up to 7 storeys. This fact is evidenced by planning application ID 203040 submitted to Waltham Forest Council which includes 68 flats, active ground floor space and a new station entrance. This application is for just one part of the site.
2. There are no other 6 or 7 storey buildings in close proximity to the Site SA59 and because of this, the level of development proposed will be overly dominant and totally out of character with the surrounding buildings.

During our consultation on the Highams Park Neighbourhood Development Plan (HP Plan) most residents were clear that they wanted the plan to include policies that would preserve the much-loved character of the Highams Park District Centre and that 'new development should fit in'. We included policies in the HP Plan to meet this requirement and the HP Plan was approved by referendum with a majority of 96.4% in March 2020. The fact that the HP Plan was adopted by the Council in July 2020, should have been a major consideration in their Site Allocations Document for the area. However, planning officers have clearly paid little heed to the HP Plan or to the many objections raised by local residents to this site allocation in their site allocations consultation.

The following narrative shows how the Council's proposals fail to meet aspirations of the local residents or respect the policies in the HP Plan regarding the character of the District Centre.

In view of the above it is clear that the level of development proposed for Site SA59 will be:

- wholly in breach of Highams Park Plan Policy CDP2 with regards to character and design, and,
- contrary to the extant and emerging Local Plan in which the overriding principles are stated as seeking to retain the character of the Borough's historic neighbourhoods. POLICY CDP2: Character & Design 9.5, requires development to be of high-quality design and should complement the existing character and appearance of the Area. In all development

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there shall be a presumption in favour of preserving the distinct character and appearance of the Area, as well as the views across it. “

It is evident that the level of development proposed for site SA59 will fail to satisfy the first, third and fourth bullet points of Paragraph 9.6 of CDP2, as per the extract below:

“9.6. *This shall be achieved by development:*

- *Positively contributing to the character of existing buildings and taking into account the predominant local character, setting and any distinctive building design features as described in the relevant Character Assessment (as per Appendix 3) for the area in which the development is located.*

New development proposals should actively demonstrate how proposals have taken into account and been informed by the local character context with reference to the context explanation in paragraph 9.9.

- *Having regard to the form, materials, scale, height, mass, orientation, pattern and grain of surrounding buildings, streets and spaces.*
- *Respecting the building lines and the predominant character of the road in which the property is located.”*

And, paragraph 9.9 of the HP Plan which states:

“9.9. *Many parts of the Plan Area have a clear architectural heritage – with an attractive character and a distinct local identity. These positive features need to be protected and preserved. New developments in such areas need to fit in rather than stand out.”*

Character Assessment 9 of the Highams Park Plan which covers Highams Park District Centre clearly articulates the importance of the Highams Park Station building and states:

“LAYOUT AND STREET FEATURES

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

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

“LANDMARKS AND NOTABLE BUILDINGS

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

The station is a one storey building which is key to the much loved ‘village’ character of Highams Park and will be totally overwhelmed by a six and seven storey building towering over it.

This proposed level of development will also not respond to the character and height of the more modern, two and four storey Highams Green/Tesco development on the opposite side of Larkshall Road.

This level of development will not just be wholly in breach of HP Plan Policy CDP2, it will completely decimate the existing character of Highams Park District Centre. It is our view

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based on our extensive consultations with local people over the past eight years, that local residents highly value the light suburban character of the area surrounding Highams Park Station and do not want to see it dominated by an incongruous block of flats which will give the area a much more urban and inner city feel.

2. The proposal for a new station entrance is included in the site allocation even though there were many objections submitted during the Council's initial LP2 Consultation stating that a new station entrance was not wanted if it meant high rise development by the station. The Council were also aware of a statement of community engagement by BECG (the consultants for the applicant in planning application ID 203040) which states that 68% of respondents were opposed to a new station entrance.

It is clear from the above consultation that people are not supportive of a new station entrance and would prefer a lower rise development without a new station entrance. There seems little point in consulting with residents if the feedback from the Council's own consultations and that of other independent bodies is completely ignored.

There is clearly a question over the soundness of including a new station entrance given that Application ID 203040 was withdrawn from planning committee on 7th December 2021 due to concerns over the viability/affordability of the development delivering a new station entrance.

There is already station entrance nearby into Larkshall Road which was only completed in 2016 and which provides step free access from the northbound platform. Single level access has always been provided from the southbound platform into The Avenue. As there are already two station exits/entrances from Highams Park with step free access we do not see the need for a third.

3. Site allocation SA59 is inconsistent and misleading. The overarching blue table proposes 145 homes on the site. Whereas, the 'site requirements' summary immediately below says "optimise site capacity and deliver around 45 new homes".

4. The site allocation does not state that the site is owned by four different owners. We are aware that the Council proposed a masterplan for the site which was rejected by the owners, which means that it is unlikely that a coherent approach and optimal development of this site can be achieved in accordance with the proposed site allocation. This view is reinforced by the fact that planning permission has already been granted on part of the site for three additional storeys and twenty flats on top of the shops at 472-474 Larkshall Road. (Application 183379), without reference to the Masterplan.

5. The Council's housing target of 27,000 new homes across the Borough by 2035 is considerably higher than the London Plan target of 12,640 ten year (even if prorated) and this is causing the Council Planning Officers to try and squeeze too much housing on to sites identified in LP2 without sufficient consideration of the how this will affect character of the historic neighbourhoods across the Borough. The housing target and the attendant site allocations should be reduced accordingly; especially where residents have expressed concerns about the adverse impact on the character of the areas where they live.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.

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The new station entrance should be dropped, as it is unnecessary given that there is already single level access to both platforms; so a third entrance is not needed. A new entrance is also most likely inviable, given that planning application ID2030 was withdrawn on 6th December the day before it was due to be considered by Planning Committee due to questions over how it would be funded; especially given TfL's well documented financial problems. Removal of the cost of the station entrance will allow the re-development of the site to go ahead with a maximum height of between four and five storeys. That part of the development abutting the station should be no more than four storeys and any five storey elevations further down towards 480 Larkshall Road. Efforts should be made such that the design matches the four storey Highams Green Tesco Development on the other side of Larkshall Road to create a boulevard effect and better architectural symmetry.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.

The Highams park Planning Group supports redevelopment of this site but at a lower level of density and massing than included in SA59 and which respects the important character of the area around the station and provides design principles that mirror the architectural rhythm of the more modern Highams Green development on the other side of Larkshall Road.

Removal of the unnecessary new station entrance/exit from the site allocation brief will improve the viability of the site and allow for a lower rise development with less units. To protect the character of the area around the station, the development should be four storeys abutting the station and rising to a maximum of five storeys further down at 472- 474 Larkshall Road.

The lower level should provide active employment space to minimise loss of employment in the District Centre.