



**Regeneration and Growth Directorate
Economic Growth & Housing Delivery**

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Mr. Stewart Murray
Strategic Director
Waltham Forest Council
The Magistrates
1 Farnan Avenue, London
Town Hall Complex
London E17 4NX

Tel: 020 8527 6227
16th July, 2019

Dear Mr. Murray,

Re: Objection to Application 191304FUL Larkshall Road, Highams Park, E4 9HH

We note that an application has been submitted for demolition of an existing building at 480 Larkshall Road and construction of two five storey buildings to provide 46 residential units. We object to this application on the grounds detailed below.

We also note that the application makes no reference to the policies in the Highams Park Plan, we believe this is a substantial omission, as it is our understanding, that when a Neighbourhood Plan has been through the examination process and the Examiner has concluded that a Plan is in conformity with the NPPF and any Development Plan, the Neighbourhood Plan carries considerable weight, but not yet full weight. The HP Plan has now been passed by an Examiner and therefore carries considerable weight.

The Highams Park Plan supports appropriate development and many parts of the application are compliant with the HP Plan, however, we believe that the application does not comply with the requirements of Policy POLICY CDP2: Character & Design. In particular, with regard to the first, third and fourth bullet points of paragraph 9.6 which require that development should:

- *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.*

On measuring the application against Policy CDP2, it is our view that:

The building does not reflect the character and density, height and massing of the adjoining flats in Wilton Place, or the offices running along the front of 480 Larkshall Road.

The building will dominate the adjacent Highams Park Station which is a distinctive and defining feature of the character of Highams Park District Centre; this will be particularly damaging to the character of Highams Park District Centre as a whole, especially when viewed from The Avenue. Urban design principles would normally concentrate taller buildings on street frontages and then step down behind them – as at Wilton Place and Tesco. This development does the opposite.

We are aware that a permitted development scheme is planned for the other offices at 480 Larkshall Road, from business to residential use, and that it is possible that a more comprehensive development may be



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considered on this adjacent site. Approval of this application will lead to piecemeal development of the James Yard Area which will be detrimental to the rhythm and character of the District Centre and inefficient use of potential development land.

The potential to improve single level access to the town centre from the Chingford bound platform at Highams Park Station when James Yard is redeveloped has been raised as an aspiration, this development as presented could make this goal harder to achieve.

There are also issues with refuse collection and fire access as it is proposed to use the vehicular access into James Yard from Larkshall Road which has a limited height and will not allow the required access.

The proposal is also at variance with both the London Plan and the adopted Waltham Forest Local Plan:

- The natural light reaching the adjacent properties will be much reduced as the proposed blocks at 5 storeys high will be 2 and 3 storeys taller but only around 10 m distant. The afternoon and evening sunlight on the properties on the other side of the railway line (numbers 1 to 17 The Avenue); the nearest point of the development to these properties in The Avenue will only be around about 25 m.
- There are also windows proposed on the east side of the blocks to kitchens and bathrooms and these will overlook the residential properties and gardens in The Avenue identified in the previous section.
- At 25 m the distance between the proposed development and nearby properties does not conform with the guidance in the Council's SPD on Urban Design guidance for minimum separation distance between the windows of habitable rooms and kitchens in opposing developments. The separation for a 5 storey building should be 50m for a height of 5 storeys, and 30 metres for a height of 3 storeys.
- This proposal significantly exceeds the density standards in both the London Plan and the adopted Waltham Forest Local Plan. The development in this application proposes a density of 638 hr/ha which is considerably above the permitted density range of is 200 – 450 habitable rooms / hectare (hr/ha) and a much higher density than that of the nearby Tesco site of 335hr/ha.

Paragraph 40 of the NPPF states: "Local planning authorities have a key role to play in encouraging other parties to take maximum advantage of the pre-application stage. They cannot require that a developer engages with them before submitting a planning application, but they should encourage take-up of any pre-application services they offer. They should also, where they think this would be beneficial, encourage any applicants who are not already required to do so by law to engage with the local community and, where relevant, with statutory and non-statutory consultees, before submitting their applications."

We are aware that the Council has had pre-application discussions with the developer but it would seem that no attempt has been made to engage with the local people who may be affected by the development or with the Highams Park Planning Group. This is very disappointing as we have worked closely with Council Officers in putting the Highams Park Plan in place. The Council should encourage developers to engage with the local community, as it can prevent delays to development proposals if potential issues are identified before an application is presented. This worked well with the current development of Naseberry Court by Fairview Homes.

We hope that the above support and information will be useful to you and the case officer in reaching a decision on this application.

Yours sincerely,

Gordon Turpin
Chair

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