



Gordon Turpin
Chair, Highams Park Planning Group
67 Handsworth Avenue
Highams Park, E4 9PG
Email: highamparkplan@gmail.com

Ms. Jane Custance
Director of Strategic Planning & Development
Waltham Forest Council
The Magistrates
1 Farnan Avenue, London
Town Hall Complex
London E17 4NX

3rd November 2020

Dear Ms. Custance,

Re: Response to “Shaping the Borough Waltham Forest Local Plan LP2 Draft Site Allocations Document”

This letter contains the response of the Highams Park Planning Group (“HPPG”) to the Council’s consultation on the draft Local Plan “Shaping the Borough Waltham Forest Local Plan LP2 Draft Site Allocations Document”. This response has been prepared by HPPG in its capacity as the designated neighbourhood development forum for the Highams Park Plan Area.

1. General Comments:

- We appreciate the need for the Council to press ahead with the new Local Plan but given the limited ability to engage and meet properly with residents and business due to the COVID 19 pandemic , we respectfully suggest that the consultation should have been deferred.
- Given the trend for people looking to move to less urban and built up areas due to the impact and “lack of comfortable living space” for many people during the Coronavirus Lockdown we believe the Council should revisit and reduce its housing targets. The Council should also reconsider the parameters for the sites it is proposing to allocate in the Local Plan, in particular:
 - We do not agree with the high density proposed for the sites allocated across the Borough as such high-density development is not conducive to community cohesion nor will it provide the high quality homes and living environment that the Council should aspire to for its residents (both existing residents and newcomers to the Borough).
 - There is insufficient provision of amenity space in most sites due to the densification proposed.
 - The building heights that will be required to achieve the proposed densities on many of the sites allocated will be higher than that of buildings in the immediate vicinity. This is contrary to the headline statement in the emerging Local Plan that states that the Council wishes to retain the character of the historic town centres across the Borough.
 - The Council should seek to spread new development over a larger number sites with less intensive development on each site.



2. Site Allocations in The Highams Park Plan Area

There are only two sites allocated for development in the Highams Park Neighbourhood Plan Area (“HP Plan Area”), being sites SA62 and SA63. We assume from this that the Council is looking to make up the balance of the housing target in the HP Plan Area from windfall sites that become available over the life of the emerging Local Plan.

It is our view that to allow such a large proportion of the housing target to be met from unallocated windfall sites in the HP Plan Area will lead to development that is:

1. Unlikely to meet the housing needs for the area as outlined in the Highams Park Neighbourhood Development Plan (“HP Plan”).
2. Unlikely to be in keeping with the character of the surrounding buildings as articulated in the HP Plan.

A number of potential sites for development were identified during the HP Plan consultation process and these were included in the earlier drafts of the HP Plan. They were not included in the adopted HP Plan as Council planning officers suggested that strategic and environmental appraisals would be required, so HPPG’s Committee decided not include them as HPPG did not have the resources for this exercise. At the site allocations workshop at Chingford Assembly Hall, we suggested to Council Officers that these sites be included in the Local Plan, however, none of these sites (with the exception of 470-510 Larkshall Road have been included in the consultation document.

We have attached a listing of potential sites for development in the HP Plan Area together with headline development principles for each site. We appreciate that these sites may not be redeveloped, as they are in private ownership, however, we are aware that developers have already expressed an interest in some of these sites, so they could be redeveloped over the coming years.

We believe it would be prudent to include these sites in the emerging Local Plan’s Site Allocations document, so, if they are put forward for development, the principles for their use will have already been established and, therefore, allow for better outcomes for the HP Plan Area in terms of regeneration, character, height and density.

3. Comments on Specific Site Allocations:

Sites SA62 and SA63

It is our view that the density of development proposed for both these sites is too great, as it will require buildings of 5 or 6 storeys. Buildings of this height will dominate Highams Park District Centre and will completely change the character of the heart of Highams Park. Such high intensity development is not supported by **POLICY SET 6: CHARACTER, DESIGN & PUBLIC REALM (CDP)** of the HP Plan. Also, during our consultations for setting the policies for the HP Plan it was evident that a large majority of local residents do not support high intensity development in the HP Plan Area. In particular, **POLICY CDP2: Character & Design** states:

“Development shall be of high-quality design and should complement the existing character and appearance of the Area. In all development there shall be a presumption in favour of preserving the distinct character and appearance of the Area, as well as the views across it.”

Headline parameters for these two sites are set out in the attached list of potential sites for development.

We are aware that on 5th October a planning application (reference number no 203040) for development of a substantial portion of site SA62 by Atlantis Highams Park Ltd was made public by the Council. We



shall be submitting our comments on this application in response to this application under separate cover but for the record we should like to state that the proposed development is too high. The other buildings in the immediate vicinity of the site are a maximum of four storeys which we believe should be used as a benchmark for the height of other developments, so as not to destroy the character of the centre of Highams Park. The proposed development does not respect the scale, height, mass or design of the surrounding streets or spaces and does not complement the distinct character and appearance of the area.

4. Land to the Rear of Larks Wood – Site SA64

We note that a tract of undeveloped land between Larks Wood and Larkwood Leisure Centre has been allocated for development within Site SA64 (noted as Site A in attachment 3). We are aware that the Friends of Ainslie & Larks Woods (“FOAL”) have responded to the consultation requesting that this tract of land be removed from Site SA64 and designated as Local Green Space. We wholly concur with this proposed designation.

HPPG’s reasons for supporting the designation of Site A as “Local Green Space” are contained in the Letter of Support (attached) that we provided to FOAL in support of their application.

The COVID 19 pandemic has demonstrated how valuable green space is for the mental and physical well-being of people. In urban and suburban areas, green space was at a premium and the woods and parks were overcrowded as people sought fresh air and solace in our open spaces. This alone is a compelling argument to retain our pockets of green spaces as an important amenity for people and, as the population of the Borough continues to grow whilst the size of new homes and gardens become smaller, maintaining our greenspaces will become even more important.

Thank you for your kind attention.

Yours sincerely,

Gordon Turpin
Chair
Highams Park Planning Group

Attachments:

1. Potential Sites for Development in HP Plan Area
2. Graphic showing location of the Land to the Rear of Larks Wood as Site A
3. Letter of Support to FOAL re: Land to the Rear of Larks Wood