



Place and Design Team
Waltham Forest Council
Waltham Forest Town Hall
Forest Road
Walthamstow E17 4JF

Gordon Turpin
Chair, Highams Park Planning Group
67 Handsworth Avenue
Highams Park, E4 9PG

Email: highamparkplan@gmail.com

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Re: HPPG Response to Waltham Forest Local Plan Part 2 Site Allocations Consultation

This letter contains the comments of the HP Planning Group (HPPG) regarding the three sites that are situated within the HP Strategic Location, being:

1. 472-510 Larkshall Road, James Yard and Shell Garage (R19078)

We note that this site is still shown as being in Highams Park and Hale End Ward. This is no longer the case, following the boundary changes. It is now part of Hatch Lane and Highams Park North Ward.

As mentioned in the LP2 document some parts of this site already have been granted planning consent.

The development proposal for the part of the site owned by Atlantis Highams was resisted by local residents and the application was refused by planning committee on the grounds that it was an overdevelopment of the site, was out of character with this part of the district centre and the proposed height of the buildings at six and seven storeys was too high. Atlantis Highams appealed, and consent was granted by the Planning Inspector subject to implementation of a CPZ. A CPZ has not been implemented and the construction has not yet commenced.

A planning consent has already been granted for 472 Larkshall Road for three storeys on top of the existing two storey buildings, being five storeys in total. This is a step down from the six and seven storeys approved for the Atlantis Homes site.

We note the Shell Garage site is bounded to the south by 472 Larkshall Road; to the east (behind the garage) by 36-50 Wilton Place which is comprised of blocks of three storey apartments and, to the south, by 1-9 Wilton place which is also predominantly a three-storey development. Given the foregoing, we recommend that the LP2 parameters for this site should specify that should development of the Shell Garage take place it should be no more than three storeys to fit in with the character, scale and massing of the surrounding properties and to prevent loss of light to 36-50 Wilton Place.

For the same reasons development of that part of the site between 36-50 Wilton Place and the railway line should be restricted to three/four storeys.

These character/height restrictions should be included in LP2, so it is clear to developers what is likely to be permissible on the site(s)

2. Highams Park Industrial Estate (R19039)

As per our response to the earlier consultation (our letter of 11th December 2020 refers) the Highams Park Planning Group supports the principle of mixed development on this site. We also support the retention of trees and implementation of green corridors across the site and better connectivity.

It remains our view that parts of the area are significantly underutilised and could be put to better use as they provide very little employment or economic benefit; in particular, the plots occupied in Hickman Avenue by Hanar Cars (second hand car sales) and Elite Truck Training (HGV instruction).

Within the Placemaking Plan the position of the residential development is not specifically defined but we consider that these two sites are the best located for such development and could, perhaps, be specifically allocated for housing. Both sites back on to the Rolls Park Playing Fields, so incoming residents would benefit from abundant green space and close proximity to the Highams Park District Centre. There are no immediately neighbouring buildings other than the Shurgard Self Storage Facility, so this area could be more intensively developed than other parts of the HP Plan Area without impacting the character of the area, or adversely affecting the amenity of other residents in Highams Park.

There is precedent for conversion to housing in what was previously area BEA 1; being Endeavour House which provided 82 new homes by using land in area BEA1 originally intended for a use as a polyclinic.

There are also other parts of the Industrial Estate which are significantly underutilised (including the Shurgard site) and which have potential for providing more local employment through redevelopment and mixed use. We suggest that the Council undertakes a thorough review of the uses throughout the Industrial Estate. Reallocation of these underutilised parts of the Industrial Estate for housing will obviate the need for taller incongruous buildings across the estate.

The existing character of this stretch of Larkshall Road is of a leafy, low rise and open aspect (*illustrative pictures are shown below*) – this character should be maintained in accordance with **Policy CDP2: Character & Design** of the Highams Park Neighbourhood Plan ('HP Plan').

Figure 1. Views of the greensward along Larkshall Road



The HP Plan requires new development to fit and to retain the character of the area. To satisfy this requirement it is our view that any redevelopment of the Industrial Estate should:

- Maintain the existing greensward and trees where the site abuts the pavement in Larkshall Road as stated in Site Requirement E.

- Use Naseberry Court (further north along Larkshall Road) as an exemplar in respect of height, density and massing. In that respect, should be no more than four storeys in height along Larkshall Road. In that way development would not be dominating, would be in keeping with the properties on the opposite side of the road and with the adjoining Tesco development. It would also provide an aesthetically pleasing step down in height from the seven-storey development approved on appeal for James Yard.
- Support the Council's 15 minutes neighbourhood strategy by using best endeavours to ensure that existing occupants of the Industrial Estate are not displaced by development.

3. The Regal (R19101)

A Planning approval has been granted for this site which was broadly in line with the parameters contained in the LP2 document. In view of this we have no comments to make on this site allocation.

We are pleased to note that the site allocations in Highams Park are required to comply with the policies of the HP Plan. Their development is likely to have a significant effect on the character of Highams Park. Accordingly, it is our view that Policy CDP2 of the HP Plan and the requirements of this policy should be clearly stated as a footnote in the section covering the Highams Park Strategic Locations to give clear guidance to potential developers at the earliest stage of their deliberations for development of these sites. Policy CDP2 is stated below:

Figure 2. Policy CDP2 of The HP Plan

9.4. **POLICY CDP2: Character & Design**

9.5. 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.

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 the policy context articulated in **Paragraphs 9.7 to 9.14**.

- Ensuring that mechanical plant such as air-source heat-pumps is appropriately sited and screened so as to not be visually intrusive or to cause a noise nuisance.
- 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.
- Respecting Locally Significant Views as detailed in **Appendix 4**.
- Providing, where possible, public realm improvements.
- Contributing to the delivery of quality homes and streets that are attractive, functional and sustainable in accordance with the criteria set out in Building for Life 12.



Highams Park Planning Group

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At the end of the Site Requirements in each case could we therefore suggest the following be added "In that respect particular attention is drawn to Policy CDP2 of the Highams Park Neighbourhood Development Plan".

Yours sincerely,

Gordon Turpin
Chair
Highams Park Planning Group