

2. HP Plan Pre-submission Comments & Responses – Main Document

Ref.	Res	Pge	Policy	Your Comment	Response
1	Yes	8	Vision	<p>To manage change for the benefit of existing and incoming residents so as to create a clean and safe environment that is well maintained and managed. A place that people of all ages and from all walks of life can be proud of and will want to work together to protect.</p> <p>To preserve and enhance facilities which encourage community cohesion</p> <p>To enhance and protect the character, appearance and vitality of Highams Park as a place for business, shopping, leisure and culture.</p> <p>To enhance and protect the built environment and greenspaces throughout Highams Park whilst promoting environmentally sensitive change to improve residence’ and visitors’ enjoyment of our Area. (107 words)</p> <p>Comments</p> <ol style="list-style-type: none"> 1. For a vision statement to be effective it should be short (no more than 25 words) and inspirational 2. This is not a vision statement as shown by the sentences starting with “To”. They are Aims and Objectives as to how a particular vision might be achieved with a visionary perspective tossed in 3. One achieves a Vision through a number of Aims each by means of meeting particular Objectives 4. For “residence” read “residents” <p>So starting with the only vision sentence in the original we get</p> <p>A place that people of all ages and from all walks of life can be proud of and will want to work together to protect. (25 words)</p> <p>Correct length but can be expanded in scope by removal of unnecessary words and repetition:</p> <p>A place of which people of all ages and walks of life can be proud and want to work to protect. (21 words)</p> <p>Original vision statement uses the word “enhance/improve” four times and “protect” once and implies we want somewhere safe to live, work, shop and enjoy our leisure time:</p> <p>An enhanced, safe place for a community of all ages and backgrounds to live, work, shop and enjoy leisure time (20 words)</p> <p>And finally there is the idea of being able to adapt to change while retaining and enhancing the character of the area.</p> <p>An enhanced, safe, adaptable place for a community of all ages and backgrounds to live, work, shop and enjoy leisure time within established attractive surroundings (25 words)</p> <p>The ideas of: enhancement, safety, change, community, all ages, all “walks of life”, living, working, shopping, enjoying leisure, an established character and attractive environment are all included in the 25 words and the aims and objectives follow on naturally from it.</p>	<p>The Coordinating Committee will review the wording of the vision in the next draft of the plan, with a view to maintaining the essence of the vision but with some tightening of the wording.</p>

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2	Yes	8	Vision	The Vision for the Highams Park Neighbourhood Plan should be more locally distinctive e.g. Highams Park will retain its character as a vibrant north east London 'village' enabling residents, businesses and visitors to benefit from its extensive local amenities, easy access to central London and abundant green spaces.	The Coordinating Committee will review the wording of the vision in the next draft.
3	Yes	8		I like and agree with the Vision and Objectives, which should provide a strong framework for directing change and development in the area.	Noted with thanks
4	No	8	p8, 12, 32, 33	<p>The following comments are provided on behalf of the North East London NHS Foundation Trust (NELFT).</p> <p>NELFT provides community health and mental health services in Essex and the north east London Boroughs of Barking and Dagenham, Havering, Redbridge and Waltham Forest. The area within their jurisdiction includes the area covered by The Highams Park Neighbourhood Plan.</p> <p>NELFT are supportive of the Plan's second Objective (page 8) that development should aim to contribute to public and community facilities in the Area and bring improvements to meet the needs of the growing population. In Section 4.2, page 12, the Plan states that people's needs are met by the provision of the appropriate quantity, quality and accessibility of infrastructure. The Plan further states that consideration needs to be given to space being provided in or near the Area for a new public primary care facility, specifically noting that Naseberry Court should be considered as a candidate for this facility.</p> <p>Section 4.8 (Potential Sites for Development), Policy PSD2, pages 32 and 33, subsequently provides guidance for the development of 'Site 2: Naseberry Court and Greenthorne Centre' for potential expanded and enhanced health and social care, relocating all services currently at the former Chingford Hospital site to provide 'single site' options.</p> <p>NELFT no longer provide specialist mental health community services from Naseberry Court and the site has been vacant since 2014. The facility became surplus to requirements following a change in the way key services traditionally offered at Naseberry Court are provided. More specifically, in accordance with modern, best practice, NELFT offer services to people in the home, rather than a clinical environment. The community based care means that people can continue to lead active lives while receiving the support they need in the community for mental health problems. This ensures that people's needs are met by the provision of the appropriate quantity, quality and accessibility of infrastructure; and the delivery of health care has changed from hospital-based care to adopting care within the community.</p> <p>On this basis, Naseberry Court and Greenthorne Centre have become surplus to requirements. The change in the provision of care, has not resulted in a reduction in the overall level of services provided by NELFT within the Borough, as this method of delivery has reduced the demand on in-patient care facilities, such as those provided at Naseberry Court.</p> <p>In parallel to the focus on care within the community, a new purpose built facility, Sunflowers</p>	<p>This does not reflect the views of local residents, many of whom were disappointed that the polyclinic proposed as part of the Tesco redevelopment was not delivered.</p> <p>It is our view that this is a missed opportunity to consolidate health service provision in the Highams Park Area and request that NELFT reconsider their decision on this matter.</p> <p>However, we accept that the HP Plan cannot be contrary to the LBWF Local Plan even though we also note that this is an emerging plan and has not yet been agreed.</p> <p>During our consultations requests were made for more accommodation to be provided for the elderly or people downsizing who do not wish to leave the area and propose that this type of housing is now considered for this site if health care provision is not possible.</p> <p>Also, any development on this site should respect the leafy suburban character of the surrounding low density residential area and be mindful of the fact that it is sited immediately adjacent to the Ropers Field Conservation Area.</p>

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				<p>Court, opened at Goodmayes Hospital in 2011. The facility provides modern in-patient services and due to the expansion and development of community based mental health provision in each Borough served by the Trust. This has reduced the need for inpatient services to be provided in each locality. NELFT have also begun the refurbishment of Hawkwell Court in Chingford, which provides space for patients to access both community and mental health services to meet their needs.</p> <p>In addition, the disposal of the site, will enable the Trust to generate income to invest in the provision of enhanced facilities, improving the level of health care services across the Borough, such as those seen at Hawkwell Court.</p> <p>Based on the foregoing, the site is proposed to be developed for a residential use. The suitability of the site for residential development is supported within Waltham Forest Council’s emerging Site Specific Allocations document. The emerging policy states that, subject to it being demonstrated the social infrastructure is surplus to requirements, the site is suitable for residential development. The emerging policy goes onto advise that the site is considered to be entirely suitable for residential, being located within an area of mixed use, comprising primarily residential with elements of commercial.</p> <p>The Trust wishes to redevelop the vacant hospital site as part of the ongoing rationalisation of their services. Given the change in the emphasis of Mental Health service provision meaning Naseberry Court has become surplus to requirements, and that there will be no shortfall of health provision across the Area; disposing of the site for residential development enables the Trust to generate income to invest into the remaining estate and services. This Strategy is in line with guidance within Local Planning Policy, specifically the emerging Site Allocations document, and the National Planning Policy Framework.</p> <p>On this basis, the Trust requests that reference to Naseberry Court to provide for a single site health facility is removed in Sections 4.2 and Table 1 on page 33 amended to reflect the proposed development of the site for residential use only, as the site is not available for a health facility.</p>	
5	Yes	10	GNE1	<p>Some of these sports grounds already have outdoor but non-natural surfaces (eg hard tennis courts). Propose adding to this policy that grass should not be replaced by astroturf or other artificial surfaces over more than eg 25% of their combined grass area as measured in 2017. Page 11: add allotments next to Larkshall Road Tennis Club?</p>	<p>Our initial view is that sports provision should be suitable and fit for the purposes of the sports which it is intended to support. The suggested threshold of artificial pitch provision could have the effect of limiting the active sports use of sports grounds, resulting in potentially sub-optimal outcomes. We shall review and investigate this suggestion further before submitting the draft plan to the Council. The allotments next to Whitehall Tennis Club in Larkshall Road are already included as a designated</p>

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					Local Green Space in Appendix 2 on Page 45 as Beechwood Allotments.
6	Yes	10	GNE1	It has been suggested that under the right circumstances that green sports area can have some development to aid their use as sports areas. This potentially could provide welcome improvements but please if this is considered it should not negatively impact neighbouring properties and new building should be clear of the areas boundaries. Possibly any new buildings should also not be of more than one storey as well to limit their impact.	Restricting sports facilities to one storey may mean that a larger ground floor footprint would be required. Any proposal to build or provide sports facilities will be subject to the usual consultation process and we believe that any such restrictions should be considered if and when a proposal is submitted.
7	Yes	10	GNE1	Please no cafe to be made from the park old brick shed. The derelict boathouse could be put to some use!	A café and toilets in the park was requested by many people during the initial consultations for the HP Plan. Before writing this policy we undertook four surveys. Two of the surveys were directed at houses backing on to the park; both surveys showed over 60% of respondents in favour of a café and toilets. Two larger surveys were taken across the wider HP Plan area and both surveys showed over 90% of respondents in favour. We considered using the boathouse but it is neither derelict nor available for use as it is used by the scouts.
8	Yes	10	GNE, PCF, BED	I support all these policies	Noted with thanks
9	Yes	10	GNE1	Trees which have been removed have not been replaced - Handsworth Avenue and on corner of Church Avenue South and Gordon Avenue. Many green spaces could be much improved by planting, keeping clean and better maintenance, eg along footpath linking Gordon Avenue to Vincent Road - always looks full of litter and untidy. Green space opposite flats in Gordon Avenue - planting could make more attractive. Area near GP health centre.	LBWF's contractor now replace trees as and when they die or are removed. Replacement is not always immediate as sometimes there is a need to let the root system from the previous tree decay to make space for a new tree to become established. There was a period when trees were not replaced and, because of this, there are now many vacant tree slots in the Plan Area. Ward forum funding can be used to replant such vacant slots subject to the agreement of the resident(s) of the adjacent properties. Council Officers actively encourage local residents to adopt and manage green spaces near where they live. Abbots Crescent is a good example locally where residents have adopted and improved a

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					public greenspace. We will include encouraging local residents to adopt local greenspaces in Annexe 1 (Aspirations, Projects & Actions).
10	Yes	12		<p>Paragraph about Hale End Library succinct - maybe add about enhancing role as a library (as has been done with story readings, Love your Library Day, etc - unmet demand for books and traditional library services too).</p> <p>Is there a notice up about being on list of 'Assets of Community Value'? Are there others within HP area?</p>	<p>HPPG is in the process of setting up a Friends Group for the Hale End Library Building and we will pass these ideas on.</p> <p>We are not aware of any other buildings listed as assets of community value in the HP Plan Area. We intend to apply for the buildings listed in policies PCF2 and Policy PCF3 to be made assets of community value.</p>
11	Yes	13	PCF2	<p>Amend:</p> <p>All Saints Church has Selwyn Room as well as the hall URC on Malvern Avenue already subject to change of use application? St Anne's Church has a Hall and a Clubroom Winchester Road Methodist Church has an atrium and 3 or 4 halls</p> <p>Where churches and pubs have a garden or church yard, add in here or as part of local green spaces/pocket parks</p>	<p>Thank you. We shall remove 'hall' etc. from all the listings and instead amend the opening paragraph of the policy to read something like: 'The community hubs listed below, with their halls, other subsidiary buildings and grounds, are important community assets'</p> <p>We shall remove URC from the list.</p>
12	Yes	13	PFC	<p>Highams Park URC has closed. The Boat House belongs to the City of London but has long been maintained by local scouts. When TESCO applied for planning permission, a new Health Centre was promised.</p>	<p>Thank you. We will amend PFC2 accordingly.</p> <p>The local health providers did not want to relocate to the proposed site adjacent to Tesco. The money allocated for this project was reallocated to upgrade Handsworth Avenue Health Centre and facilities at Thorpe Hall School.</p>
13	Yes	13	PCF1	<p>I would like to emphasise that I think it is very important to keep the library building as a publicly owned building that serves the community as a library and that it is not moved to the smaller premises owned by Tesco. The library is a real asset to HP that gives its residents a sense of community and belonging; in particular, because it is a community owned, purpose built space that belongs to all of us.</p>	<p>Agreed. This is covered in policy PCF1.</p>

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14	Yes	15	BED	The reinstatement of the 'Regal' as a cinema would certainly improve the look of the building as well as providing an entertainment facility. It would be wonderful to have a bank in the area. There are far too many take-aways. These add to the problems of litter - so do betting shops.	Regeneration of the Regal building (and the adjoining site) are supported in the HP Plan on page 35. Encouraging a bank to the area is included on page 17. Control/reduction of takeaways and betting shops is covered in BED2.
15	Yes	15	BED	There should be limitations put on the number of business premises of various types within the area, eg takeaways of various types, cafes/coffee shops, 'Pound shops' etc. Parking provision for people using the local shops should be improved and 'drop off' points made available for people wanting to catch or be picked up from trains.	Policy BED2 seeks to restrict the number of takeaways and betting shops in HPDC. The roads around HPDC are already very congested during peak times and we have concerns that encouraging additional traffic by the creation of drop off points may create additional congestion. Existing shopping bays offer 15mins free short stay parking and Tesco offers free 3 hour parking for longer stays regardless of whether you are shopping in Tesco. We would like to improve town centre signage to advise visitors of the parking options. See also response to item 29 below
16	Yes	15	BED	Until the cinema is redeveloped the area will never look prosperous and attractive. For years this building has had a detrimental effect on the town centre.	Regeneration of the Regal building (and the adjoining site) are supported in the HP Plan on page 35.
17	Yes	15	BED	Unless included elsewhere, suggest add paragraph about 'working from home' businesses which would or would not be welcome eg small traders, who employ up to 3 others, handicrafts or service industries, without lots of customers calling (more than ...), only 2 rooms in domestic home, etc.	This is covered by existing policies in the Council's Local Plan. Planning permission is not necessarily needed to work from home. The key test is whether the overall character and use of the dwelling will change as a result of the business. Running a business involving employees using a domestic residence (not necessarily their own) as their main place of work would require permission. Setting aside parts of a dwelling for exclusive business use is also likely to require permission. As these uses would impact on the character of a dwelling and the area in which it is set, there are questions concerning the appropriateness of encouraging extended business uses within private dwelling houses.

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					On a wider level it is generally the case that employment generating uses are best located on employment land for which the Council has provided needs-based assessments. Encouraging businesses away from employment centres may arguably have the effect of diluting the Council's employment policies and provisions.
18	Yes		General	As the population of the area is likely to continue to increase I would suggest that some thought is given to making it easier for people to work from home, utilising garages, garden buildings and parts of their home as well as restricting the amount of business premises converted to accommodation.	Please see response to 17 above.
19	Yes	17	BED	I strongly support the reduction in the number of takeaways, etc. and encourage new, better quality cafes. And attract a bank, if possible. We should encourage more useful shops in the Hale End area, ie Oak Hill and Hale End Road.	Please see response to comment 14 above.
20	No	18	BED2	In my view there is an urgent need to encourage retail development in existing empty retail units within HPDC, especially those on Larkshall Road (from the rail station running north to Coolgardie Avenue). At the moment there are approx. 7-10 units which are empty - the lack of a local convenience store, any local bar, restaurant, café or other retail offering is particularly disappointing given the ongoing regeneration of the north west exit at Highams Park rail station and the retail offering south of the rail station.	Part of the Plan's key vision is to make HPDC a more vibrant centre, so the lack of retail take up of the units in Larkshall Road adjacent to Wilton Place is disappointing. We raised the possibility of pop up shops in Highams Park with the Council and were told it is difficult to replicate what they have done elsewhere in the Borough as the Council does not own any of the vacant shops in Highams Park. We are hopeful that the uplift in other parts of HPDC will trickle down Larkshall Road. There is already some evidence of this happening. A furniture store is moving into the old Budgen's building and there is proposal for a meze/wine bar with a covered seating area outside where La Trevi is currently situated.
21	No	18	BED2	<p>I agree with all clauses (i-x) of the policy BED2 as well as the majority of the commentary that proceeds the policy itself.</p> <p>However, the plan does not recognise or mention the large number of empty shop and restaurant fronts in the business area along Larkshall Road as part of the Tesco development west of the train station, and continuing north along Larkshall Road, up to the south end of Coolgardie Avenue. There are at least half a dozen empty sites in this area.</p> <p>The majority of these vacant shop and office sites have been empty for well over a year and are a real waste of space, especially as the Plan notes the demand for housing and commercial space in</p>	Please see the response to Comment 20 above which addresses the same issues.

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				<p>the area, not to mention public and community services such as health centres and crèches.</p> <p>I would welcome the plan making reference to this unused and indeed wasted potential along Larkshall Road. In other parts of the borough, such as along Hoe Street in Walthamstow, LBWF have offered reduced rents to community enterprises and also short term leases to local entrepreneurs. This has been a fantastic initiative, leading to a real regeneration in the area and many local entrepreneurs using their "pop up shop" experience to launch successful businesses. The Plan should encourage a similar initiative. If the properties are owned privately and not by LBWF, the Plan should note that the community wants these premises to be used for community benefit, rather than the space and community potential wasted, with pressure put on the owners to reduce rates to allow developments.</p>	The monthly Farmers' Market at Highams Park Station offers pop up shop style opportunities.
22	Yes	19	BED2 (x)	A3 developments should not be supported when in or adjacent to residential addresses or childcare facilities (ie next door, below such premises)	BED 2 includes measures to restrict the proliferation of takeaway restaurants in HPDC. HPDC is primarily a business area and we are concerned that further restrictions will prevent new businesses opening in Highams Park and be damaging to the vibrancy of the centre.
23	Yes	20	TPR	Residents should be consulted on a more limited form of CPZ such as in North Chingford, ie a 1 hour restriction single yellow line. Highams Park will never be an attractive area for walking and cycling unless parking is limited. The Plan points out that it is the only area near a station that has no limits and yet seems not to propose any restrictions. Parking for residents in my own road, Gordon Avenue, is an absolute nightmare during the day. We need a time restriction during the day to allow parking for residents.	<p>Parking was raised by many residents during our consultations but there was no significant support for CPZ's to be introduced.</p> <p>The Council has tried unsuccessfully a number of times to introduce CPZ schemes in the area The last CPZ proposal by LBWF in 2015 was rejected by local residents by a large majority. The Plan is meant to represent the wishes of local residents, so we did not feel it appropriate to include CPZ proposals in the Plan.</p>
24	Yes	20	TPR	I consider trains and buses to be good. Usually on-time. However, with increased population, the trains are often over-crowded. Parking is a nightmare and residents frequently are unable to park outside their own homes. Much of this is because commercial vehicles litter our residential streets, sometimes not moving for days or more, eg those belonging to the railway, BT, etc and fleets of vans. It used to be policy to return commercial vehicles to a depot when not in use and overnight. Could an agreement be made - perhaps with TESCO - to use their underground car park overnight? It would also dissuade the trouble-makers that are there in the evenings. I am aggrieved that one resident takes up 3 parking places with commercial vans - for free!	Development pressures have led to commercial depots being built on and an increase in commercial vehicles being parked in residential streets. Highways matters, such as commercial parking and illegal cycling, are a matter for National and Local Government to resolve and unfortunately fall outside the scope of the HP Plan.

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				Cycling on pavements is a problem. Having discussed this with police, they say it is illegal but they do not have the man-power to deal with it. This has become a real hazard for pedestrians and the disabled.	
25	Yes	22	TPR2	No mini Holland type road works .please concentrate on mending the terrible potholes	Implementation of the Mini Holland scheme and potholes are the responsibility of the Council and fall outside of the scope of the HP Plan
26	Yes	20	TPR1	There is a big problem with too much traffic and congestion in HP and often residents finding it difficult to park. I think the introduction of controlled or CPZ parking would really improve this.	Please refer to our response to comment 23 above.
27	Yes	20	TPR	I am very concerned about the air quality in Highams Park, especially along Larkshall Road, Hale End Road and Winchester Road. The beautiful centre of Highams Park is dominated by traffic and polluted air. I am concerned about the impact it has on the health of Highams Park residents, in particular the school children who will make their way down Larkshall Road and Hale End Road every day. A further concern is the traffic of lorries driving to and from the industrial estate. I would very much like to see a policy on reducing air pollution and of course traffic to the area included in the Plan. The traffic on Larkshall Road also moves very fast. I would like to see a much bigger emphasis on traffic calming measures, and encouraging cycling and walking.	Many people are concerned about air quality which is a problem across London and nationwide. The UK, Government, GLA, and the Council are working to introduce measures to control emissions. The Council is in the process of implementing the Mini Holland Scheme in Highams Park which is intended to promote walking and cycling and also introduces traffic calming measures.
28		20	TPR	I support these policies, particularly so on Parking. I also believe some attention should be given to wider measures that might alleviate the demand for parking in the first place, perhaps as part of the Aspirations section. For example, to what extent does the differential rail fare zoning between Highams Park and Chingford contribute to unnecessary traffic, congestion and excessive parking stress in the area. How much does TfL make from this differential in practice, what is the cost benefit analysis and could financial contributions be realigned on the basis of a better model.	<p>The Plan includes an aspiration for a station at Chingford Hatch to help reduce traffic flows and we have put this suggestion to TfL.</p> <p>We are also considering including in Annexe 1 an aspiration for a station at the junction of Forest Road and Hale End Road.</p> <p>We are aware that the fare differential rises steeply between Walthamstow Central and Chingford causing people to choose Highams Park Station over Chingford. This is essentially a commercial matter outside of the powers of the Plan but we have made representations to TfL.</p>
29	Yes	21	TPR1 Parki ng	<p>There should be a policy to encourage better signing and use of the Tesco car park for all visitors and businesses to HP. It is within walking distance and underused. The planning conditions for Tesco specifically make their parking available for Town centre uses. Following recent correspondence with the Council, Tesco have removed the signs in the car park saying only for the use by their customers.</p> <p>The car park is a Town centre resource that should be used before pushing for more off street parking.</p>	We agree with this suggestion. Signage is covered on pages 6 & 7 of Annexe1; we shall amend this section to make it clearer that it is intended to include parking directions for people entering the town centre.
30	Yes	21	HDA	There is no policy on the sub division of existing properties or on whether the plan should encourage or discourage the conversion of front gardens for parking.	The LBWF Local Plan includes policies on the sub-division of homes so we did not include this in the

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					Plan but we will see if we can strengthen their policies in the Plan through stringent parking and refuse storage requirements to ameliorate the impact on the surrounding area if a house is sub-divided..
31	No	21	TPR1	In my view there should be far greater parking restrictions in the area around Highams Park station - commuters regularly park on Larkshall Road, Beech Hall Road and the surrounding area to the detriment of local residents. Moreover, there is no provision for cyclists at the station apart from a small bike shed on the south-bound platform (which is not easily accessible at peak times due to platform congestion).	With regards to parking restrictions please refer to our response to comment 23. It is our understanding that the Council is planning to include cycle parking at the station as part of the Mini- Holland scheme. This may have been delayed due to the overrunning works at Highams Park Station. We shall contact the Council to enquire what their current intentions are.
32	Yes	21	TPR1	<p>Add:</p> <p>Concreting, tarmacking or paving over front gardens to create off street parking should be discouraged on environmental and aesthetic grounds.</p> <p>The car club availability on The Avenue should be signed from the station, and efforts made to establish a similar facility from the Northbound platform.</p> <p>Car parking in some areas is under greater pressure than others - point ii should be more nuanced. Developers on single plots should not be discouraged from providing one or two homes with on street parking only if that wouldn't cause a problem.</p> <p>Point v also needs to be more nuanced - the charging points for electric cars are often occupied by other vehicles, so 'dedicated' needs to be enforced! And charging cones as 'rapid' or 'standard' - in HP at least the first two points should be 'rapids'.</p>	The NPPF already requires driveways to comply with prescribed permeability standards. Therefore, we do not think it is necessary to repeat this in the Plan. We shall include the Car Club under Signage which is covered on pages 6 & 7 of Annex1. Enforcement of parking is a matter for the Council. Due to changing technology we would prefer not to be too specific about the type of electric charging points introduced.
33	Yes	21		Regarding new developments and providing suitable parking this needs to be very carefully considered and policed. Designating developments car free is often a very poor solution and long term does not address the problem. Neither is allowing developers to get away with just "clearly advertising/highlighting in sales material" that a development is car free. In the years to come when the properties get resold this can cause many problems. Introducing CPZs to police this also only moves the problem to other bordering areas and makes the residents there have to deal and put up with parking problems caused by poor planning and or developers' greed. Major new developments need to have parking. Cars are an aspect of modern living that are not going to disappear in the coming years that the plan seeks to cover.	We appreciate that "on street parking" is an issue throughout the Area. The Plan cannot override Waltham Forest's overarching Local Plan for the Borough which sets parameters for parking provision in new developments. However, to try to prevent new development exacerbating this problem, we have stipulated that development outside of HPDC should provide the maximum parking spaces allowed by the Local Plan.
34	No	22	TPR2	The Plan should encourage improved cycle parking provision at Highams Park station. The only cycle parking facilities are currently on the southbound platform. This is inconvenient for cyclists using the Wilton Way station entrance. But more than this, it is extremely difficult for all cyclists as it necessitates wheeling the bike along a crowded platform, which is impossible during peak hours.	Please refer to our reply to comment 31.

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				Cycle parking outside the station, protected from the weather, is essential to encourage more cycle use in Highams Park.	
35	Yes	22	TRP	I support the views in the consultation that improved public transport links should be created between HP and the Stratford area (Queen Elizabeth Park, Shopping, link to DLR and London City Airport)	Noted with thanks
36	Yes	22	TPR2	<p>Cycle lanes, as with footpaths, need maintaining as well as providing - and the Council needs to agree to include in street services</p> <p>Bicycle stands should generally be covered and always be signed. The signage should be lit and at least as high as road signs for eg one-way street.</p> <p>Bicycle storage in residential and commercial development should be at street level, and secure (or, in in eg basement, accessible by ramp or lift, not carrying bike upstairs).</p> <p>In addition to above amendments, please add (unless covered elsewhere):</p> <ul style="list-style-type: none"> iv provision of cycle stands at schools (as on para 3, Annexure 1), surgeries, clinics, church and community halls, etc. <p>Support too for Annexure 1 - page 2, more secure cycle parking at the station.</p>	<p>The cycle lanes suggested would be part of the public realm for which the Council already has responsibility to maintain.</p> <p>Design and lighting of cycles stand will be subject to the normal planning consultation rules prior to installation.</p> <p>We will add the recommendation that cycle storage should be located on the street or basement level floor to Policy TPR2.</p> <p>We cannot impose conditions on sites that have already been developed but we shall include improved cycle parking at buildings providing public amenities as an Aspiration in Annexure 1.</p>
37	Yes	22	TPR	<p>More improvements to HP Station - a toilet, and easy disabled access to the 'down' (Chingford) platform.</p> <p>I strongly support a bus service to Whipps Cross Hospital. If an additional service is not considered, at the very least the W16 should be diverted around the roundabout and this service improved generally.</p>	<p>Toilets at the Station are included as an Aspiration in Annexe 1 (page 6).</p> <p>A request for a bus service to Whipps Cross Hospital has been made to TfL.</p>
38	No	22	TPR2	There should be a far greater focus on creating safe routes for cyclists and pedestrians in HPDC, as there has been in the Walthamstow and Blackhorse Rd areas of the borough.	Please refer to the response to comment 27
39	Yes	24		The term "Affordable Housing" is this really affordable and are the correct people being targeted or reaping the benefit of the potential benefits? Are the correct people that need help and supportive getting it or even sometimes are they being taken advantage off. Would other solutions such as housing Cooperatives be more suitable and be a better more sociable solution! Particularly as council/social housing is no longer an allowed solution.	<p>Policy HDA1 is designed to give preference to local people who wish to buy affordable housing. The Plan cannot dictate who owns or develops housing on a site or the price at which it is sold.</p> <p>The Council has been building new houses for social rent in the Borough: including two houses in St Leonards Avenue which were completed in March 2017.</p>
40	Yes	24	HDA, CDP	I support these policies. Page 27 says development must be consistent with the design principles summarised in the character assessments. But when I look at the Character assessments I do not get a strong sense of what the design principles are for each area, possibly because the areas are	We shall review the character assessments and add more detail where appropriate.

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				quite varied in their make-up. The Plan should therefore make allowance for the fact that within each Area there are mini-areas that have particular features which should be taken into account in any development.	
41	Yes	25	HDA1	It belatedly occurs to me that we should perhaps make some mention of supporting the development of homes for disabled people and that these should be built to the highest disability specifications possible rather than the minimum.	We shall review policy HDA 1 to see if we can incorporate a requirement or express preference for this kind of housing in some of the potential sites identified for development. With regards to standards LBWF require 10% of all homes to be suitable for wheelchair users and 100% of all homes to meet "Lifetime Homes" standards.
42	Yes	25		Welcome support to having suitable housing for what the residents require. Good homes that suit older residents wishing to downsizing can hopefully free up larger properties and for new younger families that people will want to live in and not choose out of desperation. A balanced range is required and not all tiny one bed flats that only benefit buy to let landlords and the coffers of developers. Good homes with 3 bed plus are a must that are practical and well laid out with storage. New homes must also be supplied with parking.	Policy HDA1 provides for a range of housing types and where they should be located. Policy TPR1 stipulates the parking provision required for new development.
43	Yes	25	HDA1	Strongly support i, ii and iv Perhaps amend ii to show some provision for young adults and 'down-sizers' outside the HPDC also helpful, eg small plot or part of mixed development. Perhaps add v about support for sheltered housing/warden supported accommodation, to include guest room(s). (Some in homes they acknowledge are too big for present needs are reluctant to move in case there is nowhere for the family to stay when they visit).	One of the Plan's goals is to maintain and enhance the character of the area. Outside of HPDC the area is predominantly family housing with gardens. The Plan seeks to maintain this character. We shall consider adding an additional paragraph in HDA1 covering sheltered accommodation.
44	Yes	25	HDA	Existing housing (social or LA) should be upgraded and improved where it has deteriorated. The flats in Vincent Road and Gordon Avenue need exterior refurbishment as those of a similar nature have been in Hale End Road, Walthamstow.	The Plan supports improvement of social housing stock and in some instances recommends redevelopment of existing sites. Maintenance of the sites mentioned is the responsibility of the Council or housing association that owns/manages a particular site.
45	Yes	26	HDA2	Should be 'financial' not 'economic'	We shall amend the wording as suggested.
46	Yes	28		Both here and in the descriptions of character, please indicate the distinctiveness of large mature trees such as plane and horse chestnut compared to smaller but still mature blossom trees. Add too that, although we are fortunate to have forest areas nearby, street trees have a part to play in air quality and noise reduction.	We shall review the character assessments and add more detail where appropriate.
47	Yes	28	CDP2	The amount of infill and 'back garden' development should be restricted. Any new buildings should not be allowed to dominate the surrounding area in the way that the Tesco building does in Highams Park or to appear above the skyline.	In its Local Plan LBWF says that it will resist garden development. We have tried to strengthen this policy by requiring maximum parking provision for such sites. We also now aim to include a provision

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					that the building lines and character of neighbouring properties must be respected.
48	Yes	30	SUS	I support these Policies. But on SUS2 item vii, I wonder about the practicality and even desirability of planting two trees for every tree felled for anything but the largest developments. I endorse the principle of replacing trees, but consideration also needs to be given to the type of replacement trees so as not to create wider problems in the longer term.	Trees often die after planting and external monitoring survival is not reliable, so this requirement is included to help maintain the predominantly leafy character of the Area. The Council has a very comprehensive tree policy which describes in detail how the species of replacement trees are decided.
49	Yes	32	PSD	I think the plan's requirement that 'development be directed at sites that have already been developed' is of the utmost importance to maintain our area's green spaces and residents' quality of life. No greenfield sites should be built on.	Noted with thanks.
50	Yes	32	PSD2	St Patricks Court on the Bridle Path off Oak Hill could be included in the list of development sites in order to make it clear that if this site became available it should be developed as low rise housing with a maximum height below the surrounding forest tree canopy.	We shall add it to the list.
51	Yes	32	PSD	Add power for local authority to "force" landlords to let at reasonable terms and rents where units remain empty for longer than a defined period (say 1 year) or to be subject to compulsory purchase. To minimise blight of empty properties (retail, commercial and residential)	Rent controls are outside the remit of a neighbourhood plan.
52	Yes	32	PSD1, PSD2, PSD3, DC01	Support all of the above policies.	Noted with thanks.
53	Yes	32	PSD, DCO	I support these Policies and the Delivery Plan	Noted with thanks.
54	Yes	33	POLIC Y PSD2:	St Patrick's Court tower block should be included in the possible sites - as if it is sold / transferred for redevelopment eg by a Housing Association, it would be a good time for the height to be reduced significantly. Or it could be converted as is for sheltered accommodation.	We shall add it to the list and include sheltered accommodation as a suggested use for the site.
55	Yes	33	PSD2	Site 9 Best Western Epping Forest Hotel Oak Hill. This site has potential for redevelopment as a care home (use class C2) alongside some residential sheltered housing. This would enable local residents who need such facilities to remain in the area whilst releasing under occupied larger family housing.	We shall include sheltered accommodation as a suggested use for this site.
56	Yes	34	PSD2	Table 1, site 3 Aldriche Way. Redevelopment of this site should only be linked to Celebration Way/Jacks Farm Way ONLY IF the development is of a nature and style consistent with those in Celebration Way and Jacks Farm Way.	Should Aldriche Way be redeveloped it will be subject to the normal consultation process and the design parameters (including linking the estate with the adjoining Highams Green) would be consulted upon at this time.

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57	Yes	35	PSD2	<p>I have a few comments, so I will try to contribute in an orderly way below.</p> <p>Regal Cinema I think this should be a huge priority and would be the most important element of regenerating the Hale End road end of the HP central area. If there is not progress being made by the current owners, the Council should consider compulsory purchase and moving the development forward. I think this needs to be a mixed use facility though, so that it can be used during the day as an opening work space/cafe/deli - and in the evening as a food/entertainment/bar complex. Microbrewery/Gin Distillery.</p> <p>In the development plans, the creation of an area appropriate for the creation of a Microbrewery or Distillery would be an attraction for visitors, and would create a recognisable brand tied to the area. Walthamstow has done this very successfully, as has London Fields and Bermondsey. In an ideal work this could be combined with the Regal Cinema development, but could also work in railway arches, or industrial area. The carwash etc would be appropriate, as we could open the opportunity to a range of breweries, and have a number side by side. See Bermondsey for the success of this strategy.</p> <p>Retail The current retail offer is poor, as you have highlighted in the document. The attraction of pizza express or another mid market casual dining outlet (Nando's, etc) would be a very positive move. This might then prompt a variety of other more upmarket places to also open. There is a complete lack of any clothing or non-homewares retailers. I do not know what can be done to encourage these businesses to open in the area, but this would be a very worthwhile endeavour. Many of them may require larger space than many of the existing shop fronts. A Sainsbury's local, M&S local, or Waitrose small format store would also help to lift the area. Which primarily has very small off license operators, none of whom do a full 'food to go' offer or fresh/local/convenient service.</p> <p>Festival. Highams Park would be almost perfect, due to its shape and slope for one of the alternative smaller festivals. Getting council permission from this would be a positive step, and then asking one of the festival organisers to bid to host an annual festival in the park here. It would bring colour and attention to the area.</p> <p>Another Pub operator. We currently have two Greene King managed pubs, out of 3 in total. It would be ideal to have a third pub operator enter the area to provide a completely different offer. Is there a space that would be suitable? I have some excellent small operators in mind who would be happy to consider opening in Highams Park. Or potentially a slightly different offer like a Davy's Wine Bar - or similar, which would need planning permission, but would be a great asset to the area.</p> <p>I hope these comments are helpful. I am sure many have been thought of before, but if I can help</p>	<p>These are interesting suggestions but the site is currently extremely unsafe inside and so cannot be used for commercial purposes.</p> <p>The owner has put forward a number of proposals for the sites. Originally the sites were purchased as the Head Office for Total Security Services but continued growth of the company rendered the site too small. A subsequent plan for an "arthouse cinema" did not gain the support of the Council's planning officers. We understand that the owner is currently looking at new proposals for the site that will hopefully meet the aspirations of the local community and the Council, as well as being commercially viable. We continue to monitor the sites closely.</p> <p>The retails sites in HPDC are privately owned and a Neighbourhood Plan cannot dictate the brand or franchises that operate a building on a particular site that may be developed.</p> <p>We suggest that these ideas (or similar concepts) be added to the brief of a "local trader's association" ref. Improvements to Highams Park District Centre on page 6 of Annexure1, with a view to the traders association aiming to deliver aspirations to improve the retails/entertainment/leisure offering in the HP Area.</p> <p>Your offer of assistance is much appreciated and we will be in touch.</p>

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				with any of the above please let me know. Particularly in the microbrewery, and pub space I have quite a lot of experience.	
58	Yes	35	Table 1	<p>Table 1 in the main report is the key in setting out the requirements for developers, and I am concerned about 'providing adequate parking within the sites' which is impractical at many sites but I think it is intended to placate residents.</p> <p>In particular 'providing adequate parking for all residents and users to avoid increasing pressure for on-street parking' for the Regal cinema site is completely impractical and would mean that no developer would be willing to take this on.</p> <p>With a policy to encourage this site to be a restaurant and cinema and encouraging a more vibrant town centre, this will inevitably lead to more pressure for parking.</p>	Agreed, the Character Assessments should be consistent with the parking guidelines laid out in TPR 1
59	Yes	35	Site 6 and Site 9	Large residential re-developments should seek to install, and be the initial local hub/starting point for District Heating networks within the area, Any future development adjacent to these should seek to connect to existing district heating systems, where these are installed.	This is a good point but as this covered in both the GLA's London Plan and in LBWF's Local Plan, it was not considered necessary to repeat it in the HP Plan.
60	No	35	PSD2	The regeneration of the Regal building into a cinema, bar and residential space should be a key priority - this would create a focus for the area and draw people into HPDC. It's a shame to see a building with such huge potential standing empty.	See responses to comment 14 and 57 above.
61	Yes	36	POLICY PSD2:	<p>Site 9: Best Western Epping Forest Hotel, Oak Hill</p> <p>This would be ideal as a site for sheltered housing development - private - of higher spec than some - with 2 bedroom flats - could provide a suitable option for some local people to downsize.</p>	We will amend the wording of Site 9 to include this as an aspiration for this site.
62	Yes	38		Priorities v: An attractive forecourt garden in the parking area of the station and a noticeboard added to show the whereabouts of the lake and The Highams Park.	Remodelling of the station forecourt to include a garden is already included on page 6 of Annexure 1. Signage/map is covered under signage on page 6 of Annexure 1.
63				<p>"Station Car Park Redevelopment</p> <p>This seems to be a very confusing idea. There are many complaints that parking is an issue in HP town centre and that provision has been lost historically. Why then is a useful and practical car park next to the station been considered to be removed. Some smarting up maybe but removal and remodelling should be carefully considered as not being ideal. The original landscaping, see early pictures of the station should be kept and maintained with no new significant and dramatic re-landscaping. The picture shown at the end of the other document in that form is a very poor proposal."</p>	<p>The suggestion is not to remove all car parking but to improve the appearance and pedestrian flows in the car park area behind the bus stop.</p> <p>If this idea were to be taken forward as a project a much more detailed proposal will have to be prepared and an extensive public consultation undertaken.</p>
64	Yes	44		<p>Are some 'wide-verges' which are not included in the table but could be worthy or protection - eg between 190/196 Larkshall Road and the bus stop outside St Anne's Church?</p> <p>Playing Fields or Hatch Plain - make mention that includes part of the Golf Course</p> <p>Add allotments adjacent to White Hall tennis courts.</p>	There are many small green triangles of land and grass verges throughout the area which are not listed in appendix 2 as we did not consider large enough to support viable development. We will

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					consider how we can include something in the Plan to add some protection to these verges. Beechwood allotments behind Whitehall Tennis Club is included in policy GNE1 as a designated local green space also on page 45.
65	Yes	44		It's is very welcome that HPs green spaces are getting designated and hopefully protected. Is it worth considering some of these spaces being designated as Village Greens as this provides an extremely high level of protection that is very difficult to negate. In particular the small green on Ropers Ave Map ref 7 and Rolls Park Sports Ground Map ref 8 could they benefit from this.	The designations of the land as "Local Green Spaces" in the Plan provides the same level of protection as a Village Green but without the need to meet the statutory requirements for designating a space as a Village Green.
66	Yes	44		Please can an additional green area be considered for protection on Larkshall Road between Jubilee Avenue and just past Hickman Avenue. There is a border of green space between the road and the industrial estate. This area although not publicly owned is a well used area by residents (particularly dog walkers) and an extremely welcome green area in HP town centre that add greatly to the areas village feel by giving a buffer between the Town Centre and residential areas from the industrial space/state. Hickman Avenue is one of the main entrances to the industrial estate and is a very grand, well proportioned and beautiful entrance with a line of poplar trees on either side which should have been preserved and even improved. Sadly one side of this has now been lost with the development of the Shurgard Site. This is a travesty that should not have been allowed. Can the other side that still exists be protected and the belt of green space that runs down towards Tesco (a vital green area and buffer) be protected so its appearance is not detrimentally altered or removed.	We will consider how we can include something in the Plan to add some protection to these verges and small strips of land as they add so much to the character of the area.
67	Yes	46		Titles of both maps need amending - it is policy GNE1 not GSE1	Noted – corrections will be made.
68	Yes	47		Map here shows Sheredan Road as a straight line where junction with Nightingale. However, an area of trees and shrubs (owned by LBWF) between the road and numbers (approx) 12 to 22 Sheredan Road, known locally as the 'Fairy Glen', is also worthy of protection. Both here and in Area 3 Assessment, suggest you use different colour for Forest Glade and state road is unmade.	The site was considered as an addition but was not deemed large enough. We will consider including a policy on road margins and verges which will include the 'Fairy Glen'. We will state in the character assessment that Forest Glade is unmade but do not propose to change the colour of the road.
69	Yes	49		Errors and Corrections Required i. - The properties in the Conservation Area originally had Rough Lime Render, many properties have been rendered with smooth cement render which is not in keeping and puts the properties and great risk form damp. The Original Lime render as described in the conservation area documents needs to be preserved.	We will review the character assessment and amend the wording where appropriate.

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				<p>ii. - The Gates discussed are not Wrought Iron, but I assume basic steel. The picture shows the correct gate but with a later wrought iron addition that is not original and not in keeping.</p> <p>The original look and feel of the whole area needs to be more actively maintained and encouragement offered that when changes are made the aim is to keep to the overall original aesthetic.</p> <p>Please can the original concrete lampposts be mentioned as another important part of the streetscape that needs preserving particularly as some are looking like the are starting lean over.</p>	
70	No	49	GNE1	Larkswood playing fields is a crucially important community space and should be properly protected. It plays host to many sports and leisure activities, and is a vital green open space for families and children in the area.	Larks Wood Park and Playing Fields are included in Appendix 2 on page 45 as one of the sites to be designated as a Local Green Space. Its official designation is as Metropolitan Open Land so is listed in our table separately from other playing fields.
71	Yes	50	Character assessment area 2	<p>Add to location box: ' ... top of the hill, St Anne's Church, St Anne's Church centre and St Anne's Gardens.'</p> <p>Green 'pockets' and beds, both sides of underpass from Larkshall Road to Hatch Lane. Care Homes on Hatch Lane</p> <p>NB St Anne's Church centre and St Anne's gardens are 200B Larkshall Road, The Church is number 200 and the Vicarage is 200A. The gardens abut 190-196 Larkshall Road at the rear.</p>	We will review the character assessment and amend the wording where appropriate.
72	Yes	51	8.3.3	<p>Add Forest Glade's character as an unmade road</p> <p>Paragraph on street trees plays down the significance of blossom trees - Sunnysdene in particular, but also Sheredan, Clivedon and Nightingale have important visual effects in season from trees in bloom. This area was known as the 'Garden Estate' before WW2, and a number of trees in front and back gardens are very well-established (magnolia, cherry, lilac, apple, etc).</p> <p>Add that some residences have private garages, eg between semidetached pairs or at the end of the terrace or eg at back of garden - some on Forest Glade.</p> <p>Make reference to streets which do (eg Nightingale) and do not currently permit part-pavement parking.</p>	We will review the character assessment and amend the wording where appropriate.
73	Yes	53		<p>There seems to be either some snobbish about council estate's resident and properties in the plan. Having a good mix of developments in an area is essential to maintaining the sustainability and viability of an area.</p> <p>St Patricks Court near Oak Hill it a great building and an example of a well planned and maintained tower block (and does not compare to its so called twin in Aldriche Way. Tower blocks and high rise living do have a place in providing high quality homes as long as balanced with a suitable range of</p>	<p>The Plan seeks to provide a good mix of development in the Area including affordable housing (Policy HDA1 refers).</p> <p>The comments were not intended to be derogatory, more to point out that that the style of some developments, in particular the high rise elements,</p>

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				<p>properties across a whole area. This development has a great amount of space around it with a good provision of amenities (such as parking) for its residents that is a vital aspect of having a high density tower. Sadly with more modern 21st century high rise developments this is often not the case and they are only used as a way for developers to squeeze as many properties as possible into a small footprint of land. I am a fan of high rise living having lived on the 20th and 24th for 15 years but with the previous comments in mind there should not be any encouragement for new high rise developments, as this it is likely not to be done with the right motives - to provide highly housing with surrounding open space and amenities as already discussed but instead the motivates are more likely to be the developers profit.</p> <p>Aldridge Way seems to be much derided in the document, I'm not sure this is totally justified but appreciate the area could be improved and that the historical planning, maintenance and refurbished could have been better carried out.</p>	are incongruous with the predominant characteristics of the area. We shall reword the character assessment to make it clearer.
74	Yes	55		It isn't quite accurate to say that there is no part-pavement parking in the area. There are several marked part-pavement parking slots on the Avenue within the area.	We will amend as per this comment
75	Yes	55	Character Assessment 7	The Avenue, Hale End Road, Winchester Road and Larkshall Road are Local Distributor roads in the Borough's Road hierarchy. Only the A406 can be considered as a Primary or Strategic Road.	We will amend as per this comment.
76	Yes	55	8.3.7 Character Assessment 7	The character of Vincent Road and Gordon Avenue could be vastly improved by an external upgrade of the flats and landscaping of the gardens in front of the flats. As indicated in the Plan, these were built post WW2 and are out of keeping with the mostly Victorian or pre-war housing. Their appearance has greatly deteriorated in the last 30 years but could be pebble-dashed as have some of the flats in Walthamstow.	The Plan supports improvement of housing stock but cannot impose conditions on existing properties.
77	Yes	55		<p>I feel this Assessment could reflect that houses on many of the roads (The Avenue, Castle Avenue etc) are set well back from the pavement, as is recognised in the reference on Area 3's street features.</p> <p>On street layout, I would suggest that both front and back gardens are more generous, and there are back gardens that provide off street parking too. So suggest deleting the word Front from second sentence of 3rd para, so it just reads " Gardens are more generous ..."</p>	We will review the character assessment and amend the wording where appropriate.
78	Yes	57	8.3.9	Add in that station car park used for monthly farmers' market and other community events. Also my view re the subway/underpass - strongly support the proposal for pumped drainage here. Add in re mix of uses of retail premises within HPDC, with examples such as Heales Cycles, and indications where no further retail units/services needed in that field eg coffee/sandwich shops.	We will review the character assessment and amend as appropriate.

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79	Yes	30 45	4.7 SUS Appen dix 2	An excellent piece of work. On first reading (and I hope to give it a more thorough read later) I have only two comments. In the sustainability section you refer to SUDs, it should be SuDS. Secondly Woodford rugby club only own the club house and the top pitch. We lease the bottom pitch from Waltham Forest, who own it.	Thank you, we shall amend as suggested.
80	No	16	BED1	We suggest a small amendment to make clear the definition of employment uses suitable under draft policy BED1 is to accords with the NPPF's definition of 'economic development'. Also under point ii of draft policy BED1, the criteria opposing a net loss of jobs on site is deemed over prescriptive and potentially risks deterring innovative start-up businesses investing in the area that may not have the same employment densities as previous uses initially, however still deliver significant economic development and wider benefits for the local economy. Therefore we suggest the deletion of this point or rewording to read "proposals that result in a net loss of jobs shall be considered in light of all other material considerations".	This policy was not intended to prevent retail use but to discourage lower employment uses such as storage facilities. Employment density across area BEA13 is not currently high, so we shall reword the policy to say that proposals that result in the likely long-term reduction in employment should usually be rejected..
81	Yes	13	PCF1	Small typo? - p 13 - Policy PCF 1 ii . Should that read '..... any development of the site: ii Increases (or maintains or reduces) the existing number of car parking spaces.	Thank you, we shall amend as suggested.