

Summary of Representations on the Highams Park Neighbourhood Plan
7th January - 18th February 2019

Count	Respondent	Representation	Consultation Point	Summary of Representation	HPPG Response/Action of Representation
1	Canal and River Trust (Tessa Craig)	Email	Plan	No comment	Noted
2	Natural England (Sharon Jenkin)	Email/ Letter	Plan	No specific comments on this neighbourhood plan.	Noted
3a	Environment Agency (Lisa Mills)	Email/ Letter	Flood Risk	There are areas of flood zone 2 and 3 within the neighbourhood of Higham's Park. For further information please consult the Local Authorities Strategic Flood Risk Assessment and Surface Water Management Plans. Developers need to ensure a sequential approach is taken to the selection/location of any site allocations to avoid areas at high risk of flooding and that relevant policies comply with the National Planning Policy Framework (NPPF).	The HP Plan was silent on this issue as it was considered a matter that was already adequately addressed by the overarching London and LBWF plans.
3b	Environment Agency (Lisa Mills)	Email/ Letter	GNE	The River Ching / Ching Brook runs through the neighbourhood area, designated main river. We welcome the inclusion of 'Policy Set 1: Greenspace & Natural Environment (GNE)', with the aim to protect and enhance greenspace. However, it is disappointing that the River Ching / Ching Brook has not been designated as a green space. Given this designation and associated obligations, plus	We recognise that the Ching Brook in policy SUS 1 as an important wildlife corridor but were of the opinion that it does not qualify under NPPG criteria as a Local Green Space as large tracts of the brook are inaccessible to the general public. The Ching is already afforded significant protection in the Waltham Forest Local Plan through its designation as an Archaeological Priority Zone and large tracts of it falling within areas designated as sites of Special

Count	Respondent	Representation	Consultation Point	Summary of Representation	HPPG Response/Action of Representation
				the value this feature has to the Higham's Park community, it would be appropriate to recognise the River Ching / Ching Brook as an important Green Space within the Plan.	Scientific Interest.
3c	Environment Agency (Lisa Mills)	Email/ Letter	SUS1	<p>We also welcome the specific mention of the River Ching / Ching Brook within 'Policy SUS1: Biodiversity and Nature Conservation', recognising the importance of the Ching Brook as an important green corridor through the Plan Area, and how "development shall aim to avoid adverse effects on the Ching Brook and its banks".</p> <p>Whilst the plan acknowledges the designation of the Ching Brook as a designated water body under the Water Framework Directive in the supporting text, this could be strengthened to give specific mention to WFD within 'Policy SUS1: Biodiversity and Nature Conservation'. With any development alongside watercourses, consideration should be given to the requirements of the WFD which includes causing no overall deterioration in water quality or the ecological status of any waterbody. This is in line with paragraph 174 of the National Planning Policy Framework (NPPF) which aims to promote the conservation, restoration and enhancement of priority habitats. It would be good to reference how developers can find out more</p>	<p>Accepted and the policy will be amended accordingly: An additional Policy SUS2 will be added, as follows:</p> <p>Policy SUS2: Development Alongside the River Ching</p> <p>Any development alongside the River Ching, must:</p> <ul style="list-style-type: none"> i. Comply with the requirements of the Water Framework Directive (WFD) to ensure that no overall deterioration in water quality or the ecological status of the River Ching. ii. Provide a naturalised buffer zone of at least 8 metres from the top of the bank of the River Ching. The buffer zone should be designed and managed for the benefit of biodiversity, e.g. by planting of locally appropriate species native to the UK, and otherwise 'undisturbed' by development i.e. no fencing, footpaths or other development and should not include formal landscaping. i. Allow for removal of any invasive species present and provide for a long term management and control plan. ii. When visiting any site, work methods should include appropriate biosecurity measures to prevent the spread and contamination of Invasive Non-native Species in order to avoid contravention of the Wildlife and Countryside

Count	Respondent	Representation	Consultation Point	Summary of Representation	HPPG Response/Action of Representation
				<p>about the ecological status of the River Ching / Ching brook via Catchment Data Explorer. The following measures should also be considered for proposed development near the River Ching / Ching Brook, and would complement the supporting text of this policy:</p> <ul style="list-style-type: none"> ☐ A naturalised buffer zone of at least 8 metres from the top of the bank of the River Ching / Ching Brook The buffer zone should be designed and managed for the benefit of biodiversity, e.g. by planting of locally appropriate species native to the UK, and otherwise ‘undisturbed’ by development i.e. no fencing, footpaths or other development and should not include formal landscaping. A buffer zone will provide multiple benefits including natural flood management, aesthetically pleasing space and improved habitats for local biodiversity. ☐ If invasive species are present, these should be removed with consideration for a long term management and control plan. When visiting any site, work methods should include appropriate biosecurity measures to prevent the spread and contamination of Invasive Non-native Species in order to avoid contravention of the Wildlife and Countryside Act 1981. ☐ The proposed development has the 	<p>iii. Act 1981. To minimise light spill, development proposals should consider location and direction of external artificial lights to be such that the lighting levels within 8 metres of the top of the bank of the watercourse are maintained at background levels of 0-2 lux.</p>

Count	Respondent	Representation	Consultation Point	Summary of Representation	HPPG Response/Action of Representation
				<p>potential to cause light spill onto the River Ching / Ching Brook Light spill from external artificial lighting disrupts the natural diurnal rhythms of a range of wildlife using and inhabiting the river and its corridor habitat, and in particular is inhibitive to bats utilising the river corridor. To minimise light spill, development proposals should consider location and direction of external artificial lights to be such that the lighting levels within 8/5 metres of the top of bank of the watercourse are maintained at background levels of 0-2 lux.</p>	
3d	Environment Agency (Lisa Mills)	Email/Letter	Water Efficiency	<p>We welcome the inclusion of ‘Policy SUS1: Biodiversity and Nature Conservation’, and supports compliance with Policy 5.4 of the London Plan (“Retrofitting”) and the Mayor’s SPG for Sustainable Design & Construction section on Water Efficiency, following our previous recommendations. This should also be cross referenced and/or mentioned in ‘Policy HDA1: Housing Types & Affordability’. Additionally, any new residential buildings should incorporate water efficiency measures to limit water consumption to 105 litres per person per day (excluding an allowance of 5 litres or less per head per day for external water use), in line with Policy 5.15 Water Use and Supplies of the London Plan. Additionally,</p>	<p>The HP Plan Committee took the view that these issues were adequately covered by the London Plan and are likely to be strengthened in the emerging new London Plan. If the HP Plan were to include policies that were more rigorous than those contained in the extant or emerging new London Plan they could be considered as a barrier to development compared with other adjacent areas and could cause the plan to fail on examination.</p>

Count	Respondent	Representation	Consultation Point	Summary of Representation	HPPG Response/Action of Representation
				we would strongly recommend policies incorporate a BREEAM 'excellent' rating for water efficiency in new commercial developments.	
3e	Environment Agency (Lisa Mills)	Email/ Letter	Sustainable Drainage (SuDS)	You may wish to explore the merits of incorporating SuD's into future development sites. SuD's can have multidisciplinary benefits including contributing to alleviating the pressures of surface water run-off, as well as improving water quality and biodiversity. SUDs offer significant advantages over conventional piped drainage systems in reducing flood risk by attenuating the rate and quantity of surface water run-off from a site, promoting groundwater recharge absorbing diffuse pollutants and improving water quality. Ponds, reedbeds and seasonally flooded grasslands can be particularly attractive features within public open. The variety of SUDS techniques available means that virtually any development should be able to include a scheme based around these principles and provide multiple benefits, reducing costs and maintenance needs. Further information can be found at the interim code of practice for SUD's .	The HP Plan Committee took the view that these issues were adequately covered by building regulations and the London Plan and are likely to be strengthened in the emerging new London Plan. If the HP Plan were to include policies that were more rigorous than those contained in the extant or emerging new London Plan they could be considered as a barrier to development compared with other adjacent areas and could cause the plan to fail on examination.
4a	Historic England (Richard Parish)	Email/ Letter	General	We have responded directly to the Neighbourhood Forum's own draft consultation in August 2018 (copy attached)	Noted.

Count	Respondent	Representation	Consultation Point	Summary of Representation	HPPG Response/Action of Representation
				and in response to the initial boundary consultation in 2014 the comments have been integrated into the current draft. We do not therefore consider it necessary to comment in detail on the draft.	
4b	Historic England (Richard Parish)	Email/ Letter	POLICY CDP1: Heritage Assets	we have sought comments from the Greater London Archaeological Advisory Service who have made the following observation in respect of the proposed Neighbourhood Plan Area encompassing areas with archaeological potential, including the early settlement at Hale End and the Ching Valley. As such we would strongly recommend that proposed policy 9.1 acknowledge archaeological as well as built heritage as well as the desirability of identifying, preserving and enhancing significant archaeological remains as a part of approved development schemes.	Accepted. We will add an additional point to Policy CDP1 9.1, as follows: Developments within areas of archaeological interest, such as the early settlement at Hale End and the Ching Valley, should seek to identify, preserve and enhance significant archaeological remains. Developers should provide evidence that appropriate due diligence has been undertaken to identify the likelihood of archaeological remains and the measures that will be taken to preserve such remains.
5	National Grid /Wood PLC (Lucy Bartley)	Email/ Letter	General	No comment on plan. Technical advice on NG assets & developer advice.	Noted
6	BT OpenReach (Barry Blyth)	Email/ Letter	General	No comment on plan. Technical advice on BT assets and developer advice.	Noted
7	Sport England (Planning Admin Team)	Email/ Letter	General	Thank you for consulting Sport England on the above neighbourhood plan. Government planning policy, within the National Planning Policy Framework (NPPF),	We believe the plans policies adequately address the points raised in these comments. In particular, in Policy GNE1 the plan has designated playing fields in the area as Local Green Spaces. Measures to encourage walking and cycling are

Count	Respondent	Representation	Consultation Point	Summary of Representation	HPPG Response/Action of Representation
				<p>identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.</p> <p>It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 96 and 97. It is also important to be aware of Sport England’s statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England’s playing fields policy is set out in our Playing Fields Policy and Guidance document. http://www.sportengland.org/playingfieldspolicy</p>	<p>included in Policy DCO1 which calls for CIL monies to be allocated for the improvements to footpaths, signage and improved street scene as specified in Annex 1 to the HP Plan.</p> <p>Justification is NPPF specifically seeking 25% of CIL to be retained for projects in NP areas. Annex 1 is a schedule of potential candidate projects to receive and utilise such funds.</p>

Count	Respondent	Representation	Consultation Point	Summary of Representation	HPPG Response/Action of Representation
				<p>Sport England provides guidance on developing planning policy for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded. http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/</p> <p>Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 97 of the NPPF, this takes the form of assessments of need and strategies for indoor and outdoor sports facilities. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood</p>	

Count	Respondent	Representation	Consultation Point	Summary of Representation	HPPG Response/Action of Representation
				<p>area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.</p> <p>Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England’s guidance on assessing needs may help with such work. http://www.sportengland.org/planningtoolsandguidance</p> <p>If new or improved sports facilities are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes. http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-</p>	

Count	Respondent	Representation	Consultation Point	Summary of Representation	HPPG Response/Action of Representation
				<p>guidance/</p> <p>Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.</p> <p>In line with the Government’s NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England’s Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.</p>	

Count	Respondent	Representation	Consultation Point	Summary of Representation	HPPG Response/Action of Representation
				<p>Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.</p> <p>NPPF Section 8: https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities</p> <p>PPG Health and wellbeing section: https://www.gov.uk/guidance/health-and-wellbeing</p> <p>Sport England’s Active Design Guidance: https://www.sportengland.org/activedesign</p>	
8a	Transport for London (Archie Burton)	Email	TPR 2 – parking	<p>Parking provision has been raised as an issue which the Plan explicitly seeks to mitigate. The Plan proposes that all development outside of Highams Park District Centre should provide the maximum number of parking spaces</p>	<p>The HP Plan’s policy for housing outside HPDC is for larger family homes of three or more bedrooms and these would bring additional parking demand and stress if insufficient parking were provided. We shall amend the policy to require one space per home for</p>

Count	Respondent	Representation	Consultation Point	Summary of Representation	HPPG Response/Action of Representation
				<p>allowed in the adopted London Plan. This is unacceptable. Given the maximum standards within the adopted London Plan developers would be able to achieve a minimum of one parking space per home, an issue that was raised by TfL in the last round of consultation. Moreover, draft London Plan (policy T6) states that development should only provide the minimum parking necessary. The neighbourhood plan approach takes no account of accessibility or local connectivity and in effect seeks to adopt minimum standards.</p> <p>TfL therefore objects to the parking policies put forward. If the higher parking standards are related to concerns about the potential for overspill parking, the Council and Neighbourhood Forum should consider measures to overcome that including the extension of Controlled Parking Zones (CPZ) along with improvements to walking and cycling routes to support active travel.</p>	<p>houses with three or more bedrooms outside HPDC, which is an area of low PTAL. This is not a minimum standard, rather a fixed standard. For recent planning approvals for houses of this size in the Plan area, outside HPDC, it is normally the case that a driveway or garage has been provided for each dwelling, so this policy would normalise current practice and would conform with the Borough parking standards for areas of low PTAL.</p> <p>The revised wording will read as follows: 7.4. In order to encourage the safe movement of traffic on roads in the Area and accepting the more suburban nature of the Area compared with other parts of the Borough development outside of HPDC will be supported which includes the provision of one space per home for houses with three or more bedrooms.</p> <p>Controlled Parking Zones (CPZ) were considered during drafting of the Plan but in July 2015 the Council's proposal to introduce a CPZ in the Highams Park Plan Area was comprehensively rejected by 80% of local residents; this being the 5th time that CPZ proposals had been rejected.</p> <p>Given that a neighbourhood plan should reflect the views of local residents HPPG's committee did not feel that it was appropriate to support the introduction of CPZ' s in the HP Plan Area.</p>

Count	Respondent	Representation	Consultation Point	Summary of Representation	HPPG Response/Action of Representation
8b	Transport for London (Archie Burton)	Email	TPR1 – rail	<p>The Plan also discusses improvement and enhancements to local rail infrastructure, including a direct rail link to Stratford created by reopening the Hall Farm Curve, a new station at Chingford Hatch and refurbishment of Highams Park Station. These proposals conform to Section 9 policies 5 & 6 of Waltham Forest’s Local Plan:</p> <p>Supporting transport improvements that increase capacity, and improve user experience, as well as making sustainable transport modes more accessible. It should be acknowledged however, that these projects do not form part of TfL's business plan.</p> <p>Highams Park Station is owned and run by TfL as part of the Overground network. The proposed improvements to TfL infrastructure would therefore require support and co-operation from TfL Rail. As stated above that we have no current plans to invest in the proposed rail improvements, the Plan proposes applying to the Department of Transport (DfT) for ‘Access for All’ funding. However it is important to note this funding source could only apply to Step Free Access at the station rather than any more significant rail improvements. We would be happy to</p>	<p>The infrastructural improvements suggested in the HP Plan are long term goals for inclusion when possible over the life of the plan. We do not feel that it is appropriate or necessary to state in the HP Plan what is currently not contained in TfL’s business plan as this may change over the life of the Plan.</p>

Count	Respondent	Representation	Consultation Point	Summary of Representation	HPPG Response/Action of Representation
				discuss this further with the HPPG once further feasibility work has been carried out, especially to clarify the potential cost of installing lifts on both sides of the station with an interconnecting walkway for transfer between platforms.	
8c	Transport for London (Archie Burton)	Email	TPR1 - cycling	<p>The Neighbourhood Plan also proposes improvements in cycle parking provision, cycle routes and cycle lanes. It aims to encourage walking and cycling in the area; increase sustainable travel; reduce congestion; and ease parking pressure. These policies are consistent with local Policy CS7, and also support LB Waltham Forest’s ‘Enjoy Waltham Forest’ scheme, an initiative to improve and increase cycling and walking across the Borough. TfL supports them in line with policies T2 (Healthy Streets); T7 (Cycling); D7 (Public Realm) and D1 (London’s form and characteristics) of the draft new London Plan.</p> <p>The above policies would be supported by a range of cycling measures: improving signage; more secure cycle parking at the station and the Tesco store; promoting cycling at schools; the extension of the London bicycle hire scheme to cover the area; and additional & improved cycling parking facilities at buildings providing amenities to the public. TfL supports</p>	<p>Noted. We provided the Council with a proposal for a safer cycling route for the Highams Park Area as part of the Mini – Holland consultation in July 2016 but this was proposal was rejected in favour of the Council’s own proposals.</p> <p>We have made proposals to the Council’s Highways Department for improved wayfinding signage in and around the Highams Park Plan Area and it is our understanding that implementation of improved signage will commence in 2019.</p> <p>In December 2018 we were awarded a grant from City Bridge Trust to improve wayfinding and access through that part of Epping Forest that runs through the Highams Park Plan Area. Our proposals have been agreed with the City Corporation who manage the forest. We expect implementation to be completed by the end of 2019.</p>

Count	Respondent	Representation	Consultation Point	Summary of Representation	HPPG Response/Action of Representation
				these proposed measures as they would support increased cycling in the area. It will be essential to strongly encourage cycling trips by new residents and visitors to Highams Park in the coming years, especially as proposed improvements to rail services in the area are long-term proposals that may take a very long time to come to fruition.	
8d	Transport for London (Archie Burton)	Email	TPR 1 - Public transport	The Plan also proposes reviewing bus stops and routes to ensure they aren't restricting pedestrian movement in the area, and mentions improved access to areas other than central London to reduce car use. These aspirations conform to London Plan aims to increase sustainable and active travel and reduce car use. New bus routes that link Higham Park to other areas of London may be supported by TfL in future if services established would run efficiently with high ridership, and are supported in public consultations.	Noted.
8e	Transport for London (Archie Burton)	Email	CDP2	TfL welcomes the Plan's aspiration to remove street clutter such as unused phone boxes, relay boxes, and confusing signage. The removal of street clutter would improve the appearance and attractiveness of the public realm and allow more room for pedestrians to safely travel within the area, in accordance with London Plan transport policies and our	Noted. In conjunction with other local community groups we have had an active dialogue and support from Council officers. A number of telephone boxes and a redundant exchange box were removed in late 2018 early 2019.

Count	Respondent	Representation	Consultation Point	Summary of Representation	HPPG Response/Action of Representation
				own TfL Streetscape guidance.	
8f	Transport for London (Archie Burton)	Email	Generaldespite the sustainable transport measures being strongly supported in principle, the plan should make it clear that they will require funding from a mix of developer contributions and national or local funding sources.	Waltham Forest's adopted Planning Obligations SPD 2017 provide the policy environment for the collection of developer contributions towards sustainable transport aspirations. We shall add the following clarification in para.7.2 of the HP Plan: These are long term aspirations and the cost of implementation will be high. It is unlikely that developer contributions will be sufficient to fund these projects in full and that additional funding will need to be sought from local and national sources.
9a	GLA (Celeste Giusti)	Email	The draft new London Plan	The Mayor published his draft new London Plan for consultation on 1st December 2017 and the Minor Suggested Changes (following consultation) on 13 August 2018. The Examination in Public of the Draft London Plan commenced on 15 January 2019 and publication is anticipated in Winter 2019/20. Once published, the new London Plan will form part of Waltham Forest's and the neighbourhood forum's Development Plan and contain the most up-to-date policies. The Highams Park Neighbourhood Plan is required to be in general conformity with the current London Plan, however any policies that diverge from the draft new London Plan will	We have noted in the HP Plan that both the Local Plan and London Plan are currently in the process of being updated. Paragraph 1.16 on page 7 as follows: <i>"1.16. The Plan recognises the dynamic and changing nature of the planning environment and at the time of writing:</i> <i>1. A new draft London Plan has been issued and the first consultation closed on 2nd March 2018.</i> <i>2. LBWF have also issued a direction of travel document as the first stage of developing a new Local Plan."</i> Given the dynamic nature of the planning environment and the fact that it could take some time for the Local and London Plans to be adopted, to address any future conflicts, we have also made

Count	Respondent	Representation	Consultation Point	Summary of Representation	HPPG Response/Action of Representation
				become out of date as the draft new London Plan gains more weight as it moves towards publication. In addition, the Draft London Plan and its evidence base are now material considerations. In this regard officers welcome the draft Plan's references to the London Plan.	provision for regular review and updating of the plan in paragraph 1.24 on page 8 of the HP Plan.
9b	GLA (Celeste Giusti)	Email	General	<p>Neighbourhood planning provides communities the opportunity to set out a positive vision for how they want their community to develop over the next ten, fifteen, twenty years. It is about enabling rather than restricting development and a neighbourhood plan should show how it contributes towards sustainable development. The NPPF makes clear that neighbourhood plans should support the strategic development needs set out in Local Plans and plan positively to support local development.</p> <p>Officers welcome the overall objectives in the draft Highams Park Neighbourhood Plan, however the approach to industrial land is not in general conformity with the London Plan.</p>	We do not agree that the HP Plan's approach to industrial land is not in general conformity with the London Plan. Please refer to the response in section 9c below.
9c.	GLA (Celeste Giusti)	Email	Business, Commercial and Employment Sites	GLA officers welcome the Neighbourhood Plan's ambitions to protect business floorspace and employment sites, however the approaches set out in proposed Policy BED1 are not in conformity with the London	London Plan policy 4.1.2 Improving opportunities for all calls for development proposals to "support local employment, skills development and training opportunities."

Count	Respondent	Representation	Consultation Point	Summary of Representation	HPPG Response/Action of Representation
				<p>Plan and the draft new London Plan and are consider premature as borough-wide evidence is being prepared on the demand for industrial capacity.</p> <p>London depends on a wide range of industrial, logistics and related uses that are essential to the functioning of its economy and for servicing the needs of its growing population, as well as contributing towards employment opportunities for Londoners. This includes a diverse range of activities such as food and drink preparation, creative industry production and maker spaces, vehicle maintenance and repair, building trades, construction, waste management including recycling, transport functions, utilities infrastructure, emerging activities (such as data centres, renewable energy generation and clean technology) and an efficient storage and distribution system.</p> <p>Industrial land and floorspace provide the capacity for the activities described above to operate effectively. One of the industrial land uses in greatest demand is storage and logistics / distribution (CAG Consulting, London Industrial Land Demand Study, GLA 2017) and therefore the Neighbourhood Plan should not limit potential B8 floorspace in</p>	<p>4.6.2 speaks of “an important role for planning system in ensuring that an adequate mix of businesses and public service (and therefore employment opportunities) are provided close to those communities who particularly benefit from local jobs.”</p> <p>Draft LP policy E7 supports retention and intensification of employment uses and the local employment area has recently seen significant investment in new business premises.</p> <p>The Local Plan review is only just beginning and we do not believe this Plan undermines the aspirations set out in policies E6 or E7 of the draft LP and should provide local context for the Council’s review of Locally Significant Industrial Sites in due course.</p> <p>Our policy to restrict B8 use in the BEA is in conformity with Draft LP policy E1</p> <p>Our local employment area also helps to reduce journeys to work and commuting via public transport.</p>

Count	Respondent	Representation	Consultation Point	Summary of Representation	HPPG Response/Action of Representation
				<p>London.</p> <p>Whilst the existing and draft London Plans seek to protect industrial capacity, they acknowledge the potential for the introduction of residential use. An approach to co-location with housing is detailed in draft new London Plan policy E7. It is for Waltham Forest through its Local Plan process to assess its industrial areas, including Locally Significant Industrial Sites (draft London plan policy E6) and determine which areas are most appropriate for retention, intensification and release or co-location and the most suitable types of industrial uses to be provided based on need. This borough wide approach cannot be undermined by the Neighbourhood Plan.</p> <p>In line with draft new London Plan policy E1, new office floorspace should be directed to town centres.</p>	
9d	GLA (Celeste Giusti)	Email	Highams Park District Centre – BED2	Draft policy BED2 should be clear that additional residential development is supported in the district centre in line with draft London Plan policy SD8.	<p>Policy 8.3 specifically supports development of new housing in Highams Park District Centre of a locally specific nature to meet identified need; as per the policy extract:</p> <p>“8.3. Residential development shall meet the local need for particular home types:</p> <ul style="list-style-type: none"> • In HPDC apartments suitable for downsizing older households and younger, locally-connected first-time buyers shall be

Count	Respondent	Representation	Consultation Point	Summary of Representation	HPPG Response/Action of Representation
					supported.”
9e	GLA (Celeste Giusti)	Email	Affordable housing	The Neighbourhood Plan should note that 50% is a strategic affordable housing target and the London Plan (draft policy H6) and Waltham Forest’s Affordable Housing and Viability Supplementary Planning Document include the threshold approach which seeks a minimum of 35% affordable housing or 50% on public land or where industrial capacity is lost, otherwise a viability assessment must be submitted.	Paragraph 8.9 specifically supports the Borough aspiration for 50% of all new homes to be affordable.
9f	GLA (Celeste Giusti)	Email	HDA2	Draft Neighbourhood Plan policy HDA2 seeks to ensure all new residential units are at least 50sqm in size. It should be noted that in accordance with London Plan policy 3.5 (and draft policy D4) and the National Space Standards the minimum threshold is 39sqm.	We are following Local Plan Policy DM6b and accept this point and we shall remove the second bullet point from policy HA2.
	GLA (Celeste Giusti)	Email	Open space	Officers welcome the requirements to protect and enhance open spaces, green infrastructure and biodiversity. The draft new London Plan seeks a net gain in biodiversity and includes a policy on urban greening.	Noted.
10	Thames Water /Savills	Email/ Letter	General	Thames Water are the statutory water and sewerage undertaker for the Highams Park	The comments are noted. The HP Plan is not in conflict with these cited policy objectives. We believe

Count	Respondent	Representation	Consultation Point	Summary of Representation	HPPG Response/Action of Representation
	(Tasha Hurley)			<p>Neighbourhood Plan area and the whole of the Cherwell District and is hence a “specific consultation body” in accordance with the Town & Country Planning (Local Development) Regulations 2012.</p> <p>We made comments to the Highams Park Neighbourhood Plan in August 2018, however our comments have not been included in the document ‘Comments from Statutory Consultees HPPG Informal pre-submission of the draft HP Plan from 2nd July – 13th August’ Our comments remain relevant, and as such we set these out again below.</p> <p>General Comments New development should be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure.</p> <p>Paragraph 20 of the Revised National Planning Policy Framework (NPPF), July 2018, states: “Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision</p>	<p>that the overarching London Plan and the Waltham Forest Local Plan should address these issues; in particular as infrastructural needs are met by facilities available in areas adjoining the Plan Area; and, people from outside the HP Plan Area have access to facilities within the HP Plan Area.</p> <p>With regards to red-lining “Potential sites for Development” these were included in previous consultation drafts of the HP Plan but were removed from the Submission Draft submitted to the Council in November 2018; accordingly this comment no longer applies.</p>

Count	Respondent	Representation	Consultation Point	Summary of Representation	HPPG Response/Action of Representation
				<p>for... infrastructure for waste management, water supply, wastewater..."</p> <p>Paragraph 28 relates to non-strategic policies and states: "Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure..."</p> <p>Paragraph 26 of the revised NPPF goes on to state: "Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary...."</p> <p>The web based National Planning Practice Guidance (NPPG) includes a section on 'water supply, wastewater and water quality' and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with</p>	

Count	Respondent	Representation	Consultation Point	Summary of Representation	HPPG Response/Action of Representation
				<p>development needs. The introduction to this section also sets out that: “Adequate water and wastewater infrastructure is needed to support sustainable development” (Paragraph: 001, Reference ID: 34-001-20140306).</p> <p>New Connection Charges The way water and wastewater infrastructure is delivered has changed. From the 1st April 2018 all off site water and wastewater network reinforcement works necessary as a result of new development will be delivered by the relevant statutory undertaker. Local reinforcement works will be funded by the Infrastructure Charge which is a fixed charge for water and wastewater for each new property connected. Strategic water and wastewater infrastructure requirements will be funded through water companies’ investment programmes which are based on a 5 year cycle known as the Asset Management Plan process.</p> <p>Omission of a Policy on Water and Wastewater</p>	

Count	Respondent	Representation	Consultation Point	Summary of Representation	HPPG Response/Action of Representation
				<p>Infrastructure</p> <p>With the introduction of the new connection charges as set out above, we consider that it is important that there should be a section on 'Infrastructure and Utilities' in the Neighbourhood Plan which should make reference to the following: "Developers need to consider the net increase in water and waste water demand to serve their developments and also any impact the development may have off site further down the network, if no/low water pressure and internal/external sewage flooding of property is to be avoided. Thames Water encourages developers to use our free pre-planning service https://www.thameswater.co.uk/preplanning . This service can tell developers at an early stage if we will have capacity in our water and/or wastewater networks to serve their development, or what we'll do if we don't. The developer can then submit this as evidence to support a planning application and we can prepare to serve the new development at the point of need, helping avoid delays to housing</p>	

Count	Respondent	Representation	Consultation Point	Summary of Representation	HPPG Response/Action of Representation
				<p>delivery programmes.”</p> <p>Site Specific Comments The Neighbourhood Plan document identifies a number of potential development sites which are being promoted through the Neighbourhood Plan. However the detail which is provided is limited. In order for Thames to be able to provide high level site specific details we will require red line boundary plans, proposed numbers and where possible information on timescales.</p>	
11	Metropolitan Police (Matthew Fletcher)	Email/ Letter		<p>We are writing this after your consultation concerning the Highams Park Neighbourhood Plan for Waltham Forest. Thank you for the opportunity to comment on the proposal. We have previously submitted a response for the new Waltham Forest Local Plan and for the Local Transport Implementation Plan (Phase 3) requesting that Secured by Design (SBD) conditioning be implemented as a core feature for new builds within the Borough. We have also given advice about encouraging our early involvement with the Liveable Neighbourhoods Scheme that covers both Waltham Forest and Newham. We seek to reiterate this position and explain further</p>	<p>Noted with thanks. We will include the suggested wording in the Annex 1.</p> <p>“RECOMMENDATIONS: In Support of HP Plan Policy CDP2 – The following actions are proposed:</p> <ul style="list-style-type: none"> i. Designing Out Crime Accreditation (via the Secured by Design or the Secured Environments Scheme) and the incorporation of its principles should be evidenced and integral to the design and layout of the physical environment and physical building security for all builds. ii. This can be evidenced and achieved by discussion with the relevant Designing Out Crime Officer, Transport Management Unit Officer and Counter Terrorism Security Adviser and should form part of planning any new development, public spaces,

Count	Respondent	Representation	Consultation Point	Summary of Representation	HPPG Response/Action of Representation
				<p>below why our involvement, especially at the early design stages, can be integral to the enhancement of the improvements planned for Highams Park and Waltham Forest as a whole.</p> <p>We have been unable to examine the draft plan details submitted but have reviewed the supplementary information provided, most notably the Aspirations, Projects and Actions document. We have also reviewed crime figures on the Met Police website and would like to offer the following comments, observations and recommendations. These are based on available information, including our knowledge and experience as Designing out Crime Officers (DOCO) and Police Officers. It is our professional opinion that crime prevention and community safety are material considerations for any development or change to public realm. Our response is in relation to the Crime Prevention aspects of the designs in public or residential areas; any advice given by our Traffic Management Unit (TMU), Counter Terrorism Security Advisors (CTSAs) or British Transport Police (BTP) DOCOs regarding road layout and safety should also be implemented within the plans.</p> <p>We are aware of and support the Borough's Adopt Vision Zero Objective and the aim to</p>	<p>transport hubs and street at the earliest opportunity.”</p>

Count	Respondent	Representation	Consultation Point	Summary of Representation	HPPG Response/Action of Representation
				<p>reduce crime and the fear of crime linked to transport systems. However it should be noted that recorded vehicle or cycle related crime (as shown in Appendix 1) is seen to have increased over the last couple of years within Waltham Forest and is a nationally growing concern, in particular moped-theft and moped-enabled crime. If the redeveloped areas are not designed correctly, there is the potential that this could help to facilitate and increase the opportunities for such crimes, which would be at odds to both National and Local work being done by the MPS and its partners. This includes not only ensuring that the materials used to secure the vehicles are robust (e.g. one security rated ground anchors/stand per motorcycle bay to enable 2 points of locking), but confirming that the proposed changes do not create easy and excessive escape routes or facilitate moped or motorcycle enabled crime.</p> <p>The proposed increase in Secure Cycle Hubs is welcomed. However careful placement, details of the materials used, access control systems and further crime mitigation factors are all important factors to ensure they remain secure for the lifetime of their build and encourage their regular use.</p> <p>Consideration should be given to all public</p>	

Count	Respondent	Representation	Consultation Point	Summary of Representation	HPPG Response/Action of Representation
				<p>realm lighting, landscaping, footpath width and sightlines (to help improve natural and active surveillance), especially considering that public spaces can suffer from higher levels of Anti-Social Behaviour (ASB) and Violence and Sexual Offences. Open spaces are notoriously difficult to balance between permeability and openness of the design against crime prevention mitigation, however, with early discussions this would assist in providing a safer environment for future residents and visitors to the area and reduce the fear of crime. This should also help to ensure criminal activity is not displaced from one vulnerable area to another by designs implemented.</p> <p>Open Spaces should be designed to encourage their use by legitimate users, but reduce the opportunity for congregation of or intimidation by large groups and hiding spaces for weapons and drugs. As there are proposals for a Public Square and War Memorial, the design would be important to ensure that they do not also suffer from Criminal Damage. The design and layout of the physical environment and physical building security is key to creating safe environments and reducing crime and disorder. SBD Accreditation on developments will (and is</p>	

Count	Respondent	Representation	Consultation Point	Summary of Representation	HPPG Response/Action of Representation
				<p>proven to) reduce crime and its fear for residents and business with up to 75% decreased chance of being burgled and a 25% reduction in criminal damage. The scheme is also successful at reducing anti-social behaviour through a raft of measures including: robust door and window standards; access control; and careful design/layout of new homes or businesses. The Secured by Design Scheme can deliver safe, sustainable homes and businesses through techniques in crime prevention utilising independently tested products proven to resist forced entry. It should also be noted that the marginal carbon cost of building a home to Secured By Design standards would be recovered within four years and so supports a Carbon Footprint reduction for the Borough. Projected estimate savings for Police and Council resources by using SBD on new builds is approximately £1 million a year. This figure is cumulative year on year so the more projects using SBD provides a higher ongoing saving to the Borough.</p> <p>We would advise the following Recommendation be included to ensure the earliest level of crime prevention advice for proposed schemes:</p> <p>“RECOMMENDATIONS: In Support of Policy</p>	

Count	Respondent	Representation	Consultation Point	Summary of Representation	HPPG Response/Action of Representation
				<p>CS16 – The following actions are proposed:</p> <p>i. Designing Out Crime Accreditation (via the Secured by Design or the Secured Environments Scheme) and the incorporation of its principles should be evidenced and integral to the design and layout of the physical environment and physical building security for all builds.</p> <p>ii. This can be evidenced and achieved by discussion with the relevant Designing Out Crime Officer, Transport Management Unit Officer and Counter Terrorism Security Adviser and should form part of planning any new development, public spaces, transport hubs and street at the earliest opportunity.”</p>	
	Public responses				
12	Mr Michael Turpin	Support	Whole document	This is a well thought out document that accurately reflects the widely held views of a large proportion of the people in the Highams Park area based on numerous consultations and discussions.	Noted with thanks
13	Mr Vyacheslav Tretyak	Object	Policy Set 4: Transport and Parking	The Policy Set 4: Transport and Parking in the Consultation Plan as published 19 October 2018, does not provide solution to the issue of parking for the local residents. However, the issue with parking, especially for the residents of the streets and roads that are in a close	The ability of the Plan to provide solutions to parking issues is restricted by the fact that the Plan cannot include policies that conflict with the overarching London Plan and LBWF Local Plan. In the Local Plan maximum car parking standards are set to provide a limit on car parking included in new

Count	Respondent	Representation	Consultation Point	Summary of Representation	HPPG Response/Action of Representation
				<p>proximity to the station, is admitted (directly / indirectly) in the following paragraphs of the Policy Set 4: 7.5; 7.4-7.8. Nevertheless, the draftsmen in the Policy Set 4 completely omitted the solution with parking issue of the local residence., not to mention new developments in the area.</p>	<p>developments. The LBWF Development Management Policy DM16 states that the borough will seek to manage car parking levels to minimise travel by car and encourage the use of sustainable transport modes, and encourage parking levels lower than maximum standards. Supporting this policy, draft London Plan Policy T6 states that development should be designed to provide the minimum parking necessary.</p> <p>The Plan attempted to address resident's requests for improved parking provision In new developments. However, in their responses to the Submission Draft of the HP Plan both the Council and Transport for London objected strongly to Plan Policy TPR2 which stated that parking provision standards be the set at the maximum allowable standards</p> <p>Controlled Parking Zones (CPZ) were considered during drafting of the Plan but in July 2015 the Council's proposal to introduce a CPZ in the Highams Park Plan Area was comprehensively rejected by 80% of local residents; this being the 5th time that CPZ proposals had been rejected.</p> <p>Given that a neighbourhood plan should reflect the views of local residents HPPG's committee did not feel that it was appropriate to support the introduction of CPZ' s in the HP Plan Area.</p>
14	Mr Malcolm Shykles	Support	Highams Park		Noted with thanks.

Count	Respondent	Representation	Consultation Point	Summary of Representation	HPPG Response/Action of Representation
15	Miss Lydia Docker	Support		we want to park our car without any hassle.	<p>The ability of the Plan to provide solutions to parking issues is restricted by the fact that the Plan cannot include policies that conflict with the overarching London Plan and LBWF Local Plan.</p> <p>In the Local Plan maximum car parking standards are set to provide a limit on car parking at new development. The LBWF Development Management Policy DM16 states that the borough will seek to manage car parking levels to minimise travel by car and encourage the use of sustainable transport modes, and encourage parking levels lower than maximum standards. Supporting this policy, draft London Plan Policy T6 states that development should be designed to provide the minimum parking necessary.</p> <p>The Plan attempted to address resident's requests for improved parking provision In new developments. However, in their responses to the Submission Draft of the HP Plan both the Council and Transport for London objected strongly to Plan Policy TPR2 which stated that parking provision standards be the set at the maximum allowable standards</p> <p>Controlled Parking Zones (CPZ) were also considered during drafting of the Plan but in July 2015 the Council's proposal to introduce a CPZ in the Highams Park Plan Area was comprehensively rejected by 80% of local residents; this being the 5th time that CPZ proposals had been rejected.</p> <p>Given that a neighbourhood plan should reflect the</p>

Count	Respondent	Representation	Consultation Point	Summary of Representation	HPPG Response/Action of Representation
					views of local residents HPPG's committee did not feel that it was empowered to support the introduction of CPZ' s in the HP Plan Area.
16	Mrs Byrne Sonia	Make an observation	Appendix 3	<p>I am making an observation regarding area 5 on the character assessment. My observation may not fit into this part of the document but I feel a need to talk about it anyway. I live in Armstrong Avenue. The roads and pavements on Armstrong and Alders Avenue are an absolute disgrace. They are in urgent need of resurfacing and are getting worse by the day. I have noticed most of the roads and pavements in the immediate surrounding areas have been resurfaced except the ones where I live. I do not understand this as I pay my council tax and expect the same service as those living in the more affluent streets in my area. All the council do is patch up the holes. This is dangerous to pedestrians and motorists. The other thing are the cars parking on pavements and grass verges. There is no enforcement in this area. I notice this document talks a lot about Highams Park and improvements but do not see where Armstrong Avenue and Alders Avenue fit into this. Even in the character Assessment on Area 5 it seems to skip over this area with just a few comments about it being a council estate built in the 1960's. It feels like this is</p>	<p>We note the observations regarding the state of the public realm and will pass them on to the Council's Highways Department.</p> <p>The area in question is referred to in the Plan's Character Assessment for Area 5 of which it is a relatively small component. The general principles of development having due regard to the character and appearance of an area should apply.</p>

Count	Respondent	Representation	Consultation Point	Summary of Representation	HPPG Response/Action of Representation
				the forgotten part of Highams Park and would like to see more discussion about this area in the plan.	
17	Mrs R Nicholas	Support			Noted with thanks
18	Prior	Make an observation	7 Policy Set 4	While I am sympathetic to all that is being doen to increase facilities for cycling in the area, please remember the elderly, the disabled, young mums with you g children, the i firm etc., who simply cannot get out of their cars or off the bus and get on a bike. Green transport is in danger of becoming discriminatory to these and similar groups of people. On another topic, and as there are no appropriate further spaces to make additional comments, I would like to urge that the council do everything in its power to limit and restrain the use of garish and visually unappealing shop fronts and signage in the area in tandem with your stated aim of removing superfluous street furniture etc. This would greatly enhance the environment in more ways than one.	Noted. Policy BED3 aims to improve shopfronts. The notes to Policy BED 3 note resident's desire for the removal of street clutter and this is reinforced in Section 1 (ii) of Annex 1. The Highams Park Planning Group and other community groups have made suggestions to the Council for the removal of street clutter and some redundant phone and exchange boxes were removed in December and January 2019. More removals are scheduled for 2019.
19	Mr Tony Kneller	Support		The Planning Group are local people who care about Highams Park.	Noted with thanks.
20	Mr Jon Ashley	Object	7.3 TPR2 Parking	The is not specific reference to the use of the Parking available in the Tesco development. It should be available for a minimum of 3 hr	This is private land and enforcement of such issues is beyond the scope of the HP Plan.

Count	Respondent	Representation	Consultation Point	Summary of Representation	HPPG Response/Action of Representation
				<p>stays across a wider time period. Currently it is only accessible when Tesco store is open. Particularly on Sundays this means the largest parking resource is not available for those visiting residents, other local businesses or using Public Transport for onward travel. This is particularly an issue for users of local restaurants and the new Gym. If the Regal development goes ahead it will also be affected. The plan should include agreement that the parking is to be accessible up to Midnight 7 days per week and opening hours of all business should be restricted to midnight or whatever the parking access time ends.</p>	
21	Mr Graham Reeve	Support		I fully support the plan.	Noted with thanks.
22	mr David Jennings	Support	whole document	I think this is an important step forward for Highams Park and I look forward to further positive neighbourhood initiatives in the future.	Noted with thanks.
23	Mr Srefano Andreani	Object	About limiting development ent	It is my understanding that there is a move toward not allowing loft conversion and in particular Hip to gable conversion within the permitted development. I think that due to house crises and the need for more space is of paramount and loft conversion and hip to gable should be allowed. I also think that garage conversion and 2 story elevation	This is not included in the HP Plan. This relates to an Article 4 Direction for the Highams Estate that is currently being consulted on by the Council.

Count	Respondent	Representation	Consultation Point	Summary of Representation	HPPG Response/Action of Representation
				should be allowed	
24	Ms Wendy Edis	Support			Noted with thanks.
25	Mrs Janet Charlesworth	Make an observation		I would suggest that to strengthen the case for protecting the named green spaces more detailed information/evidence is given about each space against the NPPF criteria. This probably is not necessary for any Epping Forest land named as this should be well protected by the Epping Forest act.	Accepted. We shall add additional supporting information in Appendix 2 of the HP Plan; as per the attached document "Justification for Designation of Local Green Spaces."
26	Mr Kevin Thompson	Support		The Submission Plan seems an accurate and thorough depiction of Highams Park as it is now, and a vision of the area going forward which recognises the relevant challenges, such as population and climate change. Thank you. would particularly support: 6.26 Fewer takeaways 6.31 (keeping Regal frontage) 7.2 Improve cycling and walking facilities 12.6 Improving transparency 13.5 List of priorities.	Noted with thanks.
27	Tatam	Support	Green Spaces GNE1 etc.	All Good policies as far as they go.	Noted with thanks.
28	mr David Jennings (Chairman, Highams Park Residents Association)	Support		As a residents association we feel that this is an excellent plan and wish to support it wholeheartedly. I has positive implications for the future of Highams Park and the surrounding area.	Noted with thanks.

Count	Respondent	Representation	Consultation Point	Summary of Representation	HPPG Response/Action of Representation
29	Ms Nicola Haldane	Make an observation	8 - housing and development	<p>It is noted in the plan that there is; - parking stress and - need for family homes of three bedrooms etc But I see the plan doesn't outline its objection to opportunist developers who consider building on existing parking amenities even if its on private land, ie. homeowners land/drives/back gardens. Currently a developer for eg. is looking to remove valuable multi parking spots from a much needed three bedroom family property sited in the heart of difficult commuter parking belt in order to build a new development. Given there are actually many back garden opportunities for build in and around Highams Park, I'd like to see the plan NOT supporting back garden builds in the main and/or actively removing valuable parking spaces to do so - with the likelihood of a loss of greenery to boot, particularly near the centre of town and acknowledging Highams Park residents already struggle significantly with parking. Knowing there are many infill/back garden opportunities, it would be prudent for the plan to address this issue rather than allowing developers to set a precedent.</p>	<p>The Plan provides policies which aim to guide development so it compliments the surrounding properties and the area more generally through the use of Character Assessment areas which include reference to notable features such as garden size. Good design principles are also required by the WFLP and LP.</p>
30	Mari Sinéad Morgan	Comment		<p>I would like to comment on the Highams Park Neighbourhood Plan.</p>	<p>Noted with thanks.</p>

Count	Respondent	Representation	Consultation Point	Summary of Representation	HPPG Response/Action of Representation
				I am in total agreement with the plan, especially with regard to maintaining our green spaces and the quality of life of the current residents.	
31	David Jennings (by email)	Comment		, we feel that this is an excellent Plan and should be adopted by the council. It has very positive implications for the future of Highams Park and its surrounding area.	Noted with thanks.
32	Patricia Braga	Comment		Visited HP today and saw tree cutters at the Avenue I could find no plan/Library was shut Tesco's council board had no info Nor could I access online I wish to draw your attention to cutting down trees prior to consultation/analysis of results	This is a matter for the Council.
	LPA Responses				
33a	Council	Comment	CDP	With regards Policy Set 6: Character, Design & Public Realm, I would support the aims of CDP1 and CDP2, which in any case is broadly the approach we take when considering applications, through the NPPF & current local plan. Reinforcing the need to take account of	Noted.

Count	Respondent	Representation	Consultation Point	Summary of Representation	HPPG Response/Action of Representation
				the area's character as part of the neighbourhood plan would be no bad thing from a heritage protection point of view.	
33b	Council	Comment	Appendix 3: Character Assessment Areas	<p>This too has the potential to be a useful tool when considering the impact on character as a result of new development, and I note that thorough assessment has gone into this section, particularly in identifying unique character and local landmarks. I am however hesitant about introducing too many 'local' designations which could lead to confusion in the planning process. I would suggest that those buildings being suggested as local landmarks are instead reviewed for inclusion within the local list (or statutory list as appropriate), and that if the Neighbourhood Plan is adopted this section is amended to reflect this. It should also include all local and statutory listed buildings within each area for completeness, rather than just highlighting some, as I think is the current situation. This section may also need to be amended to reflect the ongoing borough-wide characterisation study, which may provide additional useful information.</p>	<p>We appreciate the constructive nature of this comment. However, the Character Assessments are meant to be descriptions of the principal characteristics of the different areas that make up Highams Park as a guide for developers and planning officers. They are not intended to be used as a basis for designating which buildings should be locally listed. The relevant section of the Character Assessments is titled "Landmarks and Notable Buildings" is not intended to imply local or national listing.</p> <p>A review of local listings is suggested in Annex 1 under RECOMMENDATIONS: In Support of Policy CDP1 item iii which states.</p> <p>A review of the Area to identify other properties that should be either listed or locally listed.</p> <p>To this effect, a list of suggested additions was sent to Council Officers on 24th October 2018.</p> <p>We did not include a list of listed assets in the HP Plan as this is subject to change and could be misleading and an update to date list is available on the Council website.</p> <p>Once the on-going borough-wide characterisation study is completed, we can take account of this in a future review of this Plan.</p>

Count	Respondent	Representation	Consultation Point	Summary of Representation	HPPG Response/Action of Representation
33c	Council	Comment	Within Annex 1, In Support of Policy CDP1,	I would not support consideration being given to further Areas of Special Character as proposed. This is not a comment on the special character of certain areas within the Highams Park Plan area, but more that the use of Special Character Areas is an archaic designation that lacks teeth in the planning process, causing confusion. Consideration of new conservation areas is something the council supports and endeavours to do, but this has to be a rigorous process that doesn't devalue the concept of conservation areas through over-designation – the sentence at point ii. 'where residents demand them...' would not accord with best practice when considering new conservation areas.	We will remove the references to new Areas of Special Character and change the word demand to request.
33d	Council	Email	General	Since the Highams Park Plan was written, there have been a number of significant changes in the higher level policy framework that are not adequately acknowledged in the Plan. These include the Draft London Plan (extant since March 2017 and now at examination) and the Council's Direction of Travel (December 2017) which forms part of the LBWF emerging Local Plan. Whilst the Neighbourhood Plan bears relation to the Council's existing Local Plan, officers consider it now out of date as it does not adequately recognise current issues in the London	The HP Plan acknowledges the emergence of the new London and Local plans in para 1.16 We understand the concerns that changes in the Local or London plans may possibly render some of the HP Plan policies obsolete; as the HP Plan will be subordinate in the planning hierarchy to the overarching plans, however, it is our view that it is unlikely that any such conflicts will be significant. We live in a dynamic and constantly changing planning environment so, at whatever stage we proceed to examination, there will always be a risk of unexpected policy changes in superior plans and Government

Count	Respondent	Representation	Consultation Point	Summary of Representation	HPPG Response/Action of Representation
				<p>planning context in terms of design, housing numbers and area character in addition to any observations made by officers from other sections of the Council. There is accordingly the risk that the Neighbourhood Plan may not conform with the emerging Local Plan.</p> <p>A neighbourhood plan has to be in conformity with the development plan at the time that it is submitted. As the HPNP has been submitted before the emerging London Plan and WF local plan have reached adoption stage, the NP will be tested against the current versions of those plans The new London Plan will form part of Waltham Forest's and the neighbourhood forum's Development Plan and contain the most up-to-date policies. The Highams Park Neighbourhood Plan is required to be in general conformity with the current London Plan, however any policies that diverge from the draft new London Plan will become out of date as the draft new London Plan gains more weight as it moves towards publication. Once the new London Plan or Local Plan have been adopted, made neighbourhood plans remain in force as part of the borough's development plan, although parts of NPs might be superseded. Whether part of an NP is</p>	<p>policy; in consideration of this we have built a review mechanism into the HP Plan to address significant policy conflicts that may arise in the future.</p> <p>We note that against a similar backdrop of a changing planning environment (NPPF, the London Plan and Local (Brent Plan)) the Harlesden neighbourhood plan passed its examination on 19th February, 2019 and other London based neighbourhood plans facing similar circumstances are moving forward. The content of the HP Plan is based upon extensive consultations with local residents since late 2013. We do not believe that the concerns raised in this comment are sufficiently specific to warrant delaying finalisation of the HP Plan as it may be some time before the London Plan and Local Plans are finalised. In the event that some policy elements of the HP Plan may conflict with the emerging London and Local Plans when they are adopted, as the HP Plan is subordinate to these plans so we do not believe this to be of significant concern.</p> <p>Any significant conflicts can be addressed in a future review of the Plan.</p>

Count	Respondent	Representation	Consultation Point	Summary of Representation	HPPG Response/Action of Representation
				superseded or not would be a matter of planning judgement for the council as decision maker. Whilst it would remain a material consideration in decisions, more up to date policies would carry greater planning weight.	
33e	Council	Email	TPR 2	<p>Parking - The reference to parking levels outside of the district centre states family homes should be provided with maximum parking provision within the London Plan standards. This is unacceptable – this could mean up to 2 parking spaces per unit as the London Plan is overly flexible. They need to state that in these areas parking provision needs to be within the LBWF DM policies (which allow a maximum of only 1 per unit). And they must not state that it must be ‘at the maximum’ – that’s totally against the MTS and our approach to reduced car ownership – it should be ‘within the maximum’ levels (but could be lower). The document is also to last until 2033 so recognition of the relevant parking standards at the time is also advisable.</p>	<p>Housing policy outside HPDC is for larger family homes of three or more bedrooms and these would bring additional parking demand and stress if insufficient parking were provided. We shall amend the policy to require one space per home for houses with three or more bedrooms outside HPDC, which is an area of low PTAL. This is not a minimum standard, rather a fixed standard. For recent planning approvals for houses of this size in the Plan area, outside HPDC, it is normally the case that a driveway or garage has been provided for each dwelling, so this policy would normalise current practice and would conform with the Borough parking standards for areas of low PTAL. The revised wording will read as follows:</p> <p>7.4. In order to encourage the safe movement of traffic on roads in the Area and accepting the more suburban nature of the Area compared with other parts of the Borough development outside of HPDC will be supported which includes the provision of one space per home for houses with three or more bedrooms.</p>
33f	Council	Email	TPR 2	Reference to developers needing approval from the Council is noted with regard to	We will remove reference to this as a policy in the plan as it is a recommendation in Annex 1

Count	Respondent	Representation	Consultation Point	Summary of Representation	HPPG Response/Action of Representation
				marketing materials and inclusion of car-free status. This seems sensible but is this enforceable, a planning view will be required on this.	
33g	Council	Email	TPR 2	Sites must be within a proposed CPZ to be given 'car-free' status. CPZ's can protect residents from potential increases in overspill parking from developments, but only where the site is designated car free as part of the S106 agreement. This has successfully been done elsewhere in the borough in existing CPZ's. If the group wish to protect the area for a growth in parking stress the plan should consider supporting a local CPZ in the centre and to development-led CPZs where appropriate. It is not clear what the group's position is on this. Highways and Parking will be updating the CPZ policy which will be borough wide and will address matters of CPZ's arising from new development sites.	Controlled Parking Zones (CPZ) were considered during drafting of the Plan but in July 2015 the Council's proposal to introduce a CPZ in the Highams Park Plan Area was comprehensively rejected by 80% of local residents; this being the 5 th time that CPZ proposals had been rejected. Given that a neighbourhood plan should reflect the views of local residents HPPG's committee did not feel that it was appropriate to support the introduction of CPZ' s in the HP Plan Area.
33h	Council	Email	DC01	The request for all CIL and S106 to be retained in the area. Would this be managed differently to the rest of the borough, and how does anyone get access to the CIL funding?	Yes, it will be managed differently from the rest of the Borough because this part of the Borough will have a Neighbourhood Plan and the legislation requires that 25% of CIL funding is retained within the Plan Area. Council Officers will therefore need to consult with the Neighbourhood Forum when considering how S106 and CIL funds should be allocated.

Count	Respondent	Representation	Consultation Point	Summary of Representation	HPPG Response/Action of Representation
33i	Council	Email	Annex 1	refers to residents being provided with pavement parking when they ask for it. Any requests for footway parking will be dealt with using the Councils footway parking standards, there will not be separate procedures for different areas.	Noted, some streets in the Highams Park Area have pavement parking and some do not, we did not suggest that different procedures should apply.
33j	Council	Email	Annex1	requests cycle shed at station – Ongoing collaboration is required to this end. Provision of cycle parking is good however there is still much work to do to enhance safety for cyclist’s on-route to the station and town centre in a vehicle dominated environment. Developers should work towards enhancing the cycle opportunities for parking and movement.	Annex 1 contains ideas for how S106 and CIL money could be applied. It is a matter for Council Officers when considering specific planning applications as to which of these aspirations they seek to meet; in consultation with the Neighbourhood Forum
33k	Council	Email	Annex 1	image of no car park and improving the public realm is supported as an ambition. The Council would be open to decision to taking a wider view of improvements, including improving conditions/ alignment in The Avenue. This should link with opportunities for cycle access as above. ⁷⁷⁷	Noted.
33l	Council	Email	General	More reference could be given to car clubs supporting reduced car ownership in the area (which is generally poor PTAL) and to electric vehicle charge points being needed on street as well as in any new private development carparks	The HP Plan explicitly supports both car clubs and charging points for electric cars in Policy TPR1. We do not feel additional mention is required.

Count	Respondent	Representation	Consultation Point	Summary of Representation	HPPG Response/Action of Representation
33m	Council	Email	Page specific	<p>Page 22 – This should make more specific mention of walking in terms of objectives rather than just cycling.</p> <p>Item 7.4 – There should not be maximum parking provision, and a more direct reference to parking controls/CPZ's would be preferable if the group are truly looking to reduce traffic levels and impact.</p> <p>Item 12 – Our understanding is that CIL cannot be ring-fenced, and S106 is limited to the legal terms and tests (being related to the development)</p> <p>Page 3 annex 1 – part iv – seems a bit contradictory to say a review of bus stops to ensure they are not restricting traffic movements in the same sentence as aspirations to reduce car use. Bus stop reviews should really form part of a wider review, in context, of all sustainable transport modes, (i.e. walking, cycling, public transport), and of safety issues. (i.e. appropriate interchange between modes, and meeting pedestrian desires lines as far as practicable given the technical constraints around the level crossing and road layout).</p> <p>Page 3 – The London Cycle Hire scheme is operated by TfL and currently unlikely to extend to Higham's Park.</p> <p>Page 4 – comprehensive pedestrian</p>	<p>Page 22. Support for Council policy CS7 which promotes walking is expressed in in para 7.1 of the HP Plan and Annex 1 suggests ways of promoting walking. We do not feel it is necessary to make further mention of measures to promote walking in the HP Plan as promotion of walking is adequately covered in the Council's Walk, Cycle, Enjoy initiatives.</p> <p>Item 7.4 Maximum parking provision will be removed. Please refer to our response to comment 33e.</p> <p>Controlled Parking Zones (CPZ) were considered during drafting of the Plan but in July 2015 the Council's proposal to introduce a CPZ in the Highams Park Plan Area was comprehensively rejected by 80% of local residents; this being the 5th time that CPZ proposals had been rejected.</p> <p>Given that a neighbourhood plan should reflect the views of local residents HPPG's committee did not feel that it was appropriate to support the introduction of CPZ' s in the HP Plan Area.</p> <p>See comments to comment 33h above re retention and use of CIL/S106 in Neighbourhood Plan areas.</p> <p>Page 3. This is typographical error the word "and" shall be removed before the word traffic.</p> <p>Page 3. We did not specify that TfL should administer</p>

Count	Respondent	Representation	Consultation Point	Summary of Representation	HPPG Response/Action of Representation
				<p>wayfinding scheme. There are established wayfinding strategies in the borough which could be applied subject to funding, replacing current signage.</p> <p>Page 4 - New areas of footway are unlikely to be approved as the retention of footways for pedestrians is a priority. Footway parking contradicts other policies around improved sustainable transport options</p> <p>Page 5 – iii. A change of architect is sometimes of benefit to a scheme. This point is too restrictive and may be detrimental to the area. Many schemes benefit from the fresh view. v. It is not clear what purpose would be achieved in notifying buyers of matters raised during the planning process?</p> <p>Page 6 – The Council’s Enjoy Waltham Forest team and Transport Policy teams should be engaged in any discussions about cycle parking for the Town Centre and Station. The borough has installed cycle hubs at most station in the borough, and should be engaged in further work on short and long term cycle parking</p> <p>Page 7 – Any signage and wayfinding but be developed in accordance with the boroughs current wayfinding strategy, and require full highways approval. Signage to Tesco 3 hour free parking may not be in-line with</p>	<p>a cycle hire scheme. A bike hire scheme was introduced by the Council in October 2017 but failed for reasons unknown to us. It shall remain an aspiration.</p> <p>Page 4 noted. We are in discussions with the Council’s Highways Officers regarding wayfinding.</p> <p>Page 4. We presume this comment relates to pavement parking. There are streets in the Highams Park Area where footway parking is allowed, so it does not seem unreasonable to assume that if proper Council procedures are followed that requests for footway parking should be considered by the Council if the footways are wide enough to accommodate footway parking. Especially if it makes the roads safer for cyclists by providing more room on the carriageway.</p> <p>Page 5. – iii. We have recently seen evidence where retention of an architect for a development is counter-productive; we shall remove this recommendation.</p> <p>Page 5. v. this relates to matter such as schemes having restricted or zero parking. The development around Tesco has a CPZ in place that has insufficient spaces for all the new residents. Many of the new residents felt that they were insufficiently informed of parking restrictions before they purchased their properties. This is an issue of sellers being more transparent when selling properties in new developments.</p>

Count	Respondent	Representation	Consultation Point	Summary of Representation	HPPG Response/Action of Representation
				<p>promoting sustainable transport. A discussion relevant officer would be required and subject to the availability of funding.</p> <p>Page 8 – The position of a large tree will need to be considered in conjunction with a wider access and road safety study to ensure a large tree does not cause visibility or obstruction issues for any road user.</p> <p>Page 9 – If markers are proposed on public highway, approval from Highway's will be required and also subject to checks against current standards.</p>	<p>Page 6. And Page 7. Public Realm is the Council's responsibility and we fully appreciate that such matters could not be undertaken without the involvement and agreement of Council Officers.</p> <p>Page 8. This tree has now been planted after extensive consultations with the Council's Highways and Tree Officers. As it is now completed, we will remove it from Annex 1.</p> <p>Page 9. Discussions for Meridian Markers have already been commenced with Council Officers.</p>
33n	Council	Email	Overall Objective 4: Sustainable Transport	<p>Overall Objective 4 of the HPP (Sustainable Transport) states that the Plan aims to provide for better and safer public transport, pedestrian and cyclist movements through the Area. This is consistent with the LBWF Local Plan, Draft London Plan, and is supported by the Council.</p> <p>Following LBWF Core Strategy Objective CS7 and Draft London Plan Policies T1, T2, and T6, this objective should include reducing vehicle flows and vehicle dominance within the Highams Park area, and should be changed accordingly. This should reference private car use, servicing for developments, and freight and deliveries.</p>	<p>We do not see the need amend Objective 4 of the HP Plan as is not contrary to the objectives of the London or Local plans and the objectives in the superior plan policies will apply when planning applications are considered.</p>
33o	Council	Email	TPR1: Transport	<p>states that development shall aim to support and contribute towards enhancing the</p>	<p>We believe that these points are adequately covered in Annex 1 and that no further comment is needed in</p>

Count	Respondent	Representation	Consultation Point	Summary of Representation	HPPG Response/Action of Representation
				<p>provision of sustainable modes of transport, and improving movement around the Area. The principle of supporting and contributing to enhancing sustainable transport is supported by the Council. Further clarification of what is meant by movement should be given. This should focus on supporting active, and sustainable travel (cycle, walking, and public transport), in line with the Mayors Transport Strategy and Draft London Plan. TPR1 also states that development should include provision of car clubs, electric charging points, loading bays and secure cycle parking. This is supported by the Council. Following LBWF Core Strategy and the Mayors Transport Strategy, it is this list should state that where appropriate, development in the area should also:</p> <ul style="list-style-type: none"> - Support improvements to the entrances and accessibility to Highams Park Station - Contribute to local cycling and walking networks by increasing permeability through sites, delivering new walking and cycling connections, or improving existing facilities <p>Contribute to improving local bus capacity, frequency and connectivity.</p>	<p>the HP Plan documents.</p>
33p	Council	Email	TPR2: Parking Outside HPDC	Policy TPR2 (Parking) states that development outside of HPDC will be supported which	<p>Item 7.4 Maximum parking provision will be removed. Please refer to our response to comment 33e.</p>

Count	Respondent	Representation	Consultation Point	Summary of Representation	HPPG Response/Action of Representation
				<p>includes the provision of the maximum number of parking spaces allowed in the adopted London Plan. The inclusion of this policy is not acceptable as this is contradictory to policies CS7 of the LBWF Core Strategy, DM16 of the LBWF Development Management Policies, and T6 of the Draft London Plan, and should be changed accordingly.</p> <p>Maximum car parking standards for new development within Waltham Forest are detailed within Appendix 4 of the LBWF Development Management Policies. These standards state a maximum of 1 space per unit for areas of low PTAL is applied across the borough. The of the application of the adopted London Plan car parking standards is unacceptable as levels exceed this number (up to 1.5 spaces for a 3 bed unit and 2 parking spaces per 4 bed unit). Policy TPR2 of the HPP should be changed to reflect current and future local plan standards.</p>	

Count	Respondent	Representation	Consultation Point	Summary of Representation	HPPG Response/Action of Representation																												
				<table border="1" data-bbox="875 432 1666 738"> <thead> <tr> <th data-bbox="875 432 1182 555">Public Transport Accessibility Level</th> <th colspan="2" data-bbox="1182 432 1346 555">Low PTAL (1-2)</th> <th colspan="2" data-bbox="1346 432 1509 555">Medium PTAL (3-4)</th> <th colspan="2" data-bbox="1509 432 1666 555">High PTAL (5-6)</th> </tr> <tr> <td data-bbox="875 555 1182 632"></td> <th data-bbox="1182 555 1279 632">Outside CPZ</th> <th data-bbox="1279 555 1346 632">Within CPZ</th> <th data-bbox="1346 555 1442 632">Outside CPZ</th> <th data-bbox="1442 555 1509 632">Within CPZ</th> <th data-bbox="1509 555 1606 632">Outside CPZ</th> <th data-bbox="1606 555 1666 632">Within CPZ</th> </tr> </thead> <tbody> <tr> <td data-bbox="875 632 1182 687">One/Two-bed houses or flats ⁽⁵³⁾</td> <td data-bbox="1182 632 1279 687">1.0</td> <td data-bbox="1279 632 1346 687">0.75</td> <td data-bbox="1346 632 1442 687">0.6</td> <td data-bbox="1442 632 1509 687">0.4</td> <td data-bbox="1509 632 1606 687">0.3</td> <td data-bbox="1606 632 1666 687">0.25</td> </tr> <tr> <td data-bbox="875 687 1182 738">Three/Four-bed houses or flats</td> <td data-bbox="1182 687 1279 738">1.0</td> <td data-bbox="1279 687 1346 738">1.0</td> <td data-bbox="1346 687 1442 738">1.0</td> <td data-bbox="1442 687 1509 738">0.75</td> <td data-bbox="1509 687 1606 738">0.75</td> <td data-bbox="1606 687 1666 738">0.5</td> </tr> </tbody> </table> <p data-bbox="875 778 1444 1465"> Maximum car parking standards are set to provide a limit on car parking at new development. The LBWF Development Management Policy DM16 states that the borough will seek to manage car parking levels to minimise travel by car and encourage the use of sustainable transport modes, and encourage parking levels lower than maximum standards. Supporting this policy, draft London Plan Policy T6 states that development should be designed to provide the minimum parking necessary. The principle of supporting only developments that provide highest permitted parking spaces proposed in TPR2 will create a minimum standard for car parking, preventing the Council from effectively managing levels of car parking in new development. This is contrary to LBWF Core Strategy objective CS7 to </p>	Public Transport Accessibility Level	Low PTAL (1-2)		Medium PTAL (3-4)		High PTAL (5-6)			Outside CPZ	Within CPZ	Outside CPZ	Within CPZ	Outside CPZ	Within CPZ	One/Two-bed houses or flats ⁽⁵³⁾	1.0	0.75	0.6	0.4	0.3	0.25	Three/Four-bed houses or flats	1.0	1.0	1.0	0.75	0.75	0.5	
Public Transport Accessibility Level	Low PTAL (1-2)		Medium PTAL (3-4)		High PTAL (5-6)																												
	Outside CPZ	Within CPZ	Outside CPZ	Within CPZ	Outside CPZ	Within CPZ																											
One/Two-bed houses or flats ⁽⁵³⁾	1.0	0.75	0.6	0.4	0.3	0.25																											
Three/Four-bed houses or flats	1.0	1.0	1.0	0.75	0.75	0.5																											

Count	Respondent	Representation	Consultation Point	Summary of Representation	HPPG Response/Action of Representation
				manage parking to minimise the negative impacts of traffic and reducing reliance on car use, and Draft London Plan Policy T6. Policy TPR2 of the HPP should be changed to reflect this.	
33q	Council	Email	TPR2 Inside HPDC	<p>The policy context for Policy TPR2 states that car-free development may be practical within the HPDC. The HPDC is an area that is well connected to the public transport network with a high density of local amenities, and is considered an area where car-free development should be promoted and encouraged.</p> <p>With appropriate car parking controls, car-free development would work to mitigate the impact of new development on the local road network, and support the objectives of the HPP. The position on this should be clarified in further drafts of the Plan.</p>	<p>Please refer to the document in our Evidence Base “Results of Issues & Options Survey Questionnaire Number 4: New Housing Development in the Highams Park Neighbourhood Plan Area”. The responses to Issue 6 suggested that the majority of local residents opposed car-free development. This comment in the “policy context” section nevertheless confirms that such development “may be practical with appropriate control”.</p> <p>We feel this properly reflects local opinion.</p>
33r	Council	Email	Parking Management	The Council recognises that there are high levels of parking stress in the Highams Park	Controlled Parking Zones (CPZ) were considered during drafting of the Plan but in July 2015 the

Count	Respondent	Representation	Consultation Point	Summary of Representation	HPPG Response/Action of Representation
				<p>area. Introduction of parking controls could provide an opportunity to reduce this pressure by protecting parking for residents, reducing commuter parking, and managing impact of parking from new development, while also complying with the LBWF Local Plan and the Draft London Plan.</p> <p>Implementation of parking controls for on-street parking within the HPDC area is mentioned within the supporting text of Policy TPR2. Parking controls within this area would make a significant impact on reducing parking stress in this local area, as well as reducing vehicle trips to the area, helping meet the objectives of the HPP to reduce congestion, improve safety, and support an improved public realm. The Council are supportive of improved controls in this area, and where parking pressure and congestion justify the introduction of parking controls, this should be supported by the HPP.</p> <p>The need for wider parking controls across Highams Park was raised by a number of respondents to the survey on Policy TPR1 and TPR2 submitted as part of the evidence base for the HPP. It is suggested that the Neighbourhood Forum consider wider proposals for expanded parking controls outside the HPDC, especially where this is</p>	<p>Council's proposal to introduce a CPZ in the Highams Park Plan Area was comprehensively rejected by 80% of local residents; this being the 5th time that CPZ proposals had been rejected.</p> <p>Given that a neighbourhood plan should reflect the views of local residents HPPG's committee did not feel that it was appropriate to support the introduction of CPZ' s in the HP Plan Area.</p>

Count	Respondent	Representation	Consultation Point	Summary of Representation	HPPG Response/Action of Representation
				related to development.	
33s	Council	Email	Aspirations and Projects	<p>Improvements to Highams Park Station: Inclusion of improvement works to Highams Park Station within aspirational projects is supported. Examples of improvements should refer to improving step-free access to the station and station entrances.</p> <p>Appendix 1 also recommends introduction of a station cycle parking hub at Highams Park. This is consistent with the LBWF Local Plan, Vision 2020 for Cycling, and the forthcoming Local Implementation Plan 3, and is strongly supported by the borough. The HPP should highlight the potential for development to support creation of a cycle hub through land or contributions.</p> <p>Appendix 1 shows an illustration for future public realm outside Highams Park Station that shows removal of commuter car parking, and introduction of a new public space. This is supported as an ambition by the Council.</p> <p>Hall Farm Curve: Inclusion of the Hall Farm Curve as an aspirational project is consistent with the LBWF Transport Growth and Investment Strategy, and supported. As noted in Appendix 1, the Hall Farm Curve is a major transport scheme that currently is not</p>	<p>We welcome the support where stated of the aspirations detailed in Annex 1. We believe that the aspirations expressed therein are adequately articulated in Annex 1 and that no further context is required.</p> <p>We sought clarification on the from the Chair of the Council’s Transport Liaison Committee on the Hall Farm Curve and were advised that: “The Council is maintaining its campaign to reinstate the Hall Farm Curve, providing a direct link between the Chingford-St James Street section of the Overground network and the Lea Valley Line to Lea Bridge and Stratford. The campaign is predicated on the basis of preparing a deliverable scheme and business case that demonstrates value for money, mitigates operational and service impacts and results in improved connectivity, particularly for the north of the borough”</p> <p>It is for Council Officers when considering specific Planning applications to allocate developer contributions as they believe appropriate within the context of the NPPF requirements for retention at a local level where Neighbourhood Plans exist. The detailed surveys and analysis required for aspirations contained in Annex 1 should be conducted by qualified bodies as and when the opportunity arises to consider implementation of such aspirations.</p>

Count	Respondent	Representation	Consultation Point	Summary of Representation	HPPG Response/Action of Representation
				<p>supported by TfL or by Network Rail, and significant funds and agreement with both bodies, would be required to deliver this connection.</p> <p>Network Rail has previously stated that delivery of Hall Farm Curve is likely to require permanent closure of the Highams Park level crossing for safety reasons. It is expected that this would have a significant detrimental impact on local shopping centre, by causing severance across the HPDC and wider Highams Park area.</p> <p>Bus Improvements Inclusion of works to improve bus connectivity is supported. Buses are an important public transport mode, and a high quality bus network can significantly increase the PTAL of an area, and support people to reduce the need for car ownership and use. Reference to bus improvements should be strengthened within the HPP, including placement on the priorities for allocation of CIL Monies, list of projects within the delivery plan, and referred to in the supporting text for TRP1 and TRP2.</p> <p>Chingford Hatch/ Forest Road Stations: The HPP highlights an aspiration to deliver two new Overground stations at Chingford Hatch and Forest Road. While these stations would deliver increased connectivity in the north of</p>	<p>It would be premature to undertake detailed analyses at this stage. Recommendations for pavement parking have been addressed in other comments by Council Officers in which it has been suggested that appropriate procedures should be followed we agree with this approach.</p>

Count	Respondent	Representation	Consultation Point	Summary of Representation	HPPG Response/Action of Representation
				<p>the borough, it is expected that significant levels of housing and business growth in and around these areas would be required to fund and form the business case for delivery. This should be referenced within the HPP.</p> <p>Pavement Parking: Recommendations in support of Policies CPD1 & CDP2 include a proposal to introduce pavement parking where residents request them. Where pavement parking is implemented, this impacts the width and accessibility of footways, introduces clutter, and reduces the quality of the public realm, which is against the principles set out in the Mayors Transport Strategy and Walking Action Plan, the LBWF Local Plan, and Policy CDP2 within the HPP.</p> <p>New pavement parking is unlikely to be approved by the Council due to impact on the quality of pedestrian environment.</p>	