<table>
<thead>
<tr>
<th>Person ID</th>
<th>Full Name</th>
<th>Organisation</th>
<th>Comment ID</th>
<th>Q.1 - To which part of the Inspectors Modifications does this representation relate?</th>
<th>Q2 (a) - Do you consider that the Inspectors Modifications to the Walthamstow AAP are Legally Compliant?</th>
<th>Q2 (b) - Do you consider that the Inspectors Modifications to the Walthamstow AAP are Sound?</th>
<th>Q3. - Why do you consider the Inspectors Modifications to the Walthamstow AAP to be unsound?</th>
<th>Q. 4 - Please give details of why you consider the Inspector Modifications to the Walthamstow Town Centre AAP not legally compliant or unsound.</th>
<th>Q. 5 - Please set out what change(s) you consider necessary to make the Walthamstow Town Centre AAP legally compliant or sound, having regard to the test you have identified at question 5 above where this relates to soundness.</th>
<th>Q.6 - Do you wish to be informed of the date of the decision of the Secretary of State?</th>
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<tr>
<td>830639</td>
<td>Mr David Hussey</td>
<td>The HA is an executive agency of the Department for Transport (DfT). We are responsible for operating, maintaining and improving England’s strategic road network (SRN) on behalf of the Secretary of State for Transport. The HA will be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN. We have reviewed the documents and do not have any comments at this time.</td>
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<td>151060</td>
<td>Giles Dolphin Planning Decisions</td>
<td>Thank you for consulting the Mayor of London on the proposed main modifications of Waltham Forest Council’s Walthamstow Town</td>
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<td>Unit Greater London Authority</td>
<td>Centre Area Action Plan document. As you are aware, all development plan documents have to be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. Under delegated authority I confirm that the modification document is in general conformity with the London Plan.</td>
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<td>828371 Mrs Eleri Randall Planning Advisor Environment Agency</td>
<td>wtcim3 Thank you for your consultation on the Inspectors Modifications. We have no comments to make on the modifications apart from that we are pleased to see our previous comments with respect to Paragraph 13.17 have been taken on board. I was unable to modify a representation form in order to send these comments in by form. Please could you send an editable form through if you would like us to submit comments by form.</td>
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<td>732145 Angela Atkinson Stakeholder and Networks Officer</td>
<td>wtcim2 Thank you for this consultation - I can confirm that the Canal &amp; River Trust has no comments to make.</td>
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Marine Management Organisation

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<tr>
<th>ID</th>
<th>Name</th>
<th>Reference</th>
<th>Response</th>
<th>Consistency with national policy</th>
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</thead>
<tbody>
<tr>
<td>401992</td>
<td>Mr Shaun Hexter</td>
<td>wtcim1</td>
<td>Yes</td>
<td>No</td>
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(Q3 is very strangely worded - so I hope this is the correct option.) The policies around the impact of the internet do not appear coherent in that online shopping has resulted in significant loss of sales to many outlets. Those that have developed a "bricks and clicks" approach may survive, but many of the shops in Walthamstow have no such strategy. The demand for retail space is not necessarily a good indicator that the

(See comments under Q4)

Yes
number of outlets should not be reduced. For instance, the variety of outlets is important. Hence, a concern about the numbers of betting shops and estate agents has been raised. I have no doubt that retail space can be occupied - but the question is whether those businesses are the kinds of outlets which the town centre needs. By reducing the overall retail footprint in the town centre, that floorspace can be reused for other purposes and, more importantly to the remaining retailers, the quality of the
retail experience improved. The addition of "click and collect" storage (spelt Strange [sic] in MM24) is welcome - but needs easy access in terms of loading bays (very short term car parking) at the very least. Also, such property/ies would need to be reserved for appropriate businesses, otherwise such an opening would not easily be taken by those companies that might be interested. This does NOT address the remaining concerns about free car parking in general, which still seems to be
This is a concern to retailers, who recognise the competition from out of town locations with easier and cheaper access by car.

The Mall Limited Partnership

As you may recall, The Mall participated in early stages of the AAP preparation, and supported the proposed eastern extension of the shopping centre, as indicated on the MacCreanor Lavington and Gort Masterplan (2011). However, we note that the Submission Draft AAP contains the following plans showing different locations for the potential extension: 1) Figure 10.1 western extension - The Princess Foundation Masterplan (2007) 2) Figure 10.2 eastern extension - MacCreanor Lavington and Gort Masterplan (2011) 3) Opportunity Sites 8 & 9 - Potential Selborne Walk extension zone. Our comments relate to Main Modification Ref: MM15 Opportunity Site 9 - Selborne Walk Shopping Centre, and are set

1) Proposed Land Use Retail The suggested change from "Retail led extension(s)" to "Increase in retail floorspace" provides uncertainty regarding the acceptability of non retail (Class A1) uses in the extension area(s). This conflicts with other text within the AAP relating to Opportunity Area 9, which seeks active frontages onto the

For the above reasons we consider that this sentence under the "Green Roof" heading should be reworded as set out below: "Redevelopment proposals should consider opportunities to include publicly accessible space and green roof, subject to technical and viability testing"
out below in the order the proposed modifications are listed in the consultation document. Town Square and Gardens, to include cafe and seating areas, which fall under Use Class A3. In addition the extension areas might be occupied by alternative uses such as leisure uses which fall under Use Class D2. As such we consider that "Retail led extension(s)" more accurately describe the intended use of the shopping centre extension areas, and allows for flexibility to respond to market demand. 2) Proposed Land Use Housing The exact land use/occupier mix for the shopping centre extension
is not known at present, as such the AAP should be sufficiently flexible to allow for different uses to be delivered, to respond to market demand. The AAP currently refers to housing being provided on the upper floors or the shopping centre. However, leisure, office and hotel uses are often located on the upper floors of shopping centres. As such the AAP should be flexible to allow for housing and other uses including retail, leisure, office and hotel use, to be provided on the upper floors. 3) Larger Retail Unit Market trends
may change during the life of the AAP. As such, while our client understands the Council's desire to encourage larger retail units at the shopping centre, it is not considered appropriate to impose a minimum size limit on the size of new units within the extension, or place a restriction on the subdivision of larger units within the shopping centre. This could potentially result in many vacant large units in the shopping centre if there is only market demand for smaller units. Furthermore as the shopping centre is owned
by the London Borough of Waltham Forest, the Council have the ability to control the size of units with the shopping centre via a development agreement as opposed to using the planning system to impose such restrictions.

4) Green Roof The suggested requirement to provide publicly accessible space as part of the shopping centre redevelopment, would potentially conflict with the requirement to deliver residential use on the upper floors, and the need to fully consider the privacy and security of this
housing and potential other uses, as identified above. Additionally, it not considered appropriate to require the provision of a green roof as part of the shopping centre, without technical and viability testing.

These representations are submitted on behalf of the British Sign and Graphics Association in response to changes to the Proposed Submission version of the above AAP, as made by the Inspector’s Proposed Main Modifications. We note that the Inspector has proposed changes to paragraphs 12.23 and 12.25. As previously, we support these changes. However, we note that the Inspector proposes (ref MM9) to retain Policy WTC11(b)(i) substantially unaltered from the Submission Draft. Â

In particular, we note that the statement that "boxed" fascia signs should be avoided is retained. We refer to our submissions of 2 October 2013. We would draw the Inspector’s attention to paragraph 029 in the "Advertisements" section of the

We therefore consider that the proposed Modification MM9 should be further amended to delete the words “Avoid boxed fascias and".
National Planning Policy Guidance. This states that if advertisement policies are required to protect the unique character of a particular area, they should be evidence-based. In this case, the Council have produced no "evidence" to support Policy WTC11 (b)(i). Their proposal is based on prejudice only. Our evidence is based on actuality (that most of the fascia signs within the MP area would fail to comply with this policy and that it is therefore impractical) and the fact that "boxed" fascia
signage need not necessarily be unacceptable for the reasons we gave in our earlier submissions. We reiterate that the Control of Advertisements Regulations do not permit any such blanket ban on a particular form of advertisement. Regulation 3 (as confirmed in paragraph 67 of the NPPF) requires each proposal to be considered on individual merit on grounds of amenity and public safety without preconceived policies as to the acceptability or otherwise of particular types of
Thank you for the email from Objective of 3 March consulting The Theatres Trust on additional modifications to the Walthamstow Town Centre Area Action Plan. We are unable to utilise the Representation Form as it is a pdf rather than a Word document, but have used the headings from the pdf. Ref. AM16

Thank you for including theatres in para.10.22 as an example of your entertainment offer. However, this does not help as Walthamstow has no theatres and the only supported uses for future leisure development concern D2 uses, not sui generis. Theatres would therefore be excluded for any future developments and their inclusion, without further support, is unsound.

There is a definition for Sui-Generis in the Glossary which is superfluous to the document as this term is not used anywhere so a definition is not required. To reflect and conform to the National Planning Practice Guidance (NPPG) we suggest the word cultural is included in the definition of social infrastructure in the Glossary as this is missing from the list sports, leisure and cultural facilities. The title of Policy WTC4 is Leisure, Entertainment, Culture and Tourism so the word cultural should appear in the definition of social infrastructure.
include theatres, cinema, concert halls, music venues (usually in pubs), museums, libraries and art galleries. In a new section on Health and Wellbeing within the recently published National Planning Practice Guidance (NPPG) it is recommended that a range of issues should be considered through the planning and decision-making processes including social and cultural well-being. This takes the issue of health much further than just access to doctors, and we suggest to reflect the NPPG that the document also includes cultural well-being and the provision of cultural facilities. Although it
doesn’t specify what is meant by the term ‘well-being’, we suggest that well-being is having a sense of satisfaction with life. Social and cultural well-being includes the unmeasurable personal experiences that make us happy and content. Such experiences are intangible, not financially rewarding, and can either be active (sports) or passive (theatre). The provision of a variety of community infrastructure for tourism (cultural heritage) and town centre vitality (cultural facilities) etc are vital for their contribution to residents’ and visitors’ life satisfaction.