



HIGHAMS RESIDENTS' ASSOCIATION

Planning Response Framework

How HRA assesses planning applications within the Highams Estate

V3, July 2026

Introduction

Highams Residents' Association (HRA) was founded in 1955 and represents residents of the Highams Estate, Woodford Green.

It is a constituted residents' association (Constitution 2013) and engages formally with the London Borough of Waltham Forest's planning process as a non-statutory consultee.

This document sets out the framework HRA uses to assess planning applications within the Highams Estate and to decide whether to object, support, or abstain from comment.

It is applied on a case-by-case basis against the planning policies and protections listed below. It is not a standalone test of design symmetry or neighbourhood preference.

The framework is available at www.highamsra.org. Planning applications within the estate can be viewed and commented on at placehub.walthamforest.gov.uk.

At HRA's Annual General Meeting in June 2026, members unanimously backed the Association's approach to planning and specifically its continued objection to hip-to-gable loft conversions within the Highams Area of Special Character.

Part 1 | Planning Protections Applicable to the Highams Estate

1.1 Area of Special Character (ASC) — Designated 1988

The Highams Estate was designated an Area of Special Character (ASC) by the London Borough of Waltham Forest (LBWF) in 1988. It is the only ASC in the borough. The designation recognises the estate's cohesive design, uniform architectural style, consistent plot sizes, and distinctive 1930s Arts and Crafts-influenced character, developed primarily by the Warner family under architects William and Edward Hunt.

Although the ASC is a local (non-statutory) designation rather than a Conservation Area, it carries significant material weight in planning decisions. LBWF Unitary Development Plan Policy BHE1 (Urban Design) requires the council to use its planning powers to avoid harmful changes within the area.

The Council co-published, with HRA, the Highams Area of Special Character Design Guidance Leaflet, providing detailed guidance on roofs, windows, chimneys, boundary treatments, materials, and extensions. The 2024 Local Plan LP1 further embedded these protections under Policy 76 (Highams ASC), which formally requires that development protect the architectural and historic significance of the ASC.

1.2 Article 4 Direction — In Force Since 2 September 2020

On 7 August 2019, LBWF made an Article 4(1) Direction under the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended). It was confirmed on 11 March 2020 and came into force on 2 September 2020.

The Direction was sought by LBWF officers following pre-consultation with residents, in which 40 of the 59 residents who responded supported the principle of a Direction covering hip-to-gable conversions and side extensions. The Residents' Association actively supported the Direction during the statutory consultation period.

The Direction removes permitted development rights across the entirety of the Highams ASC for four classes of development visible from a public road or footway (a relevant location):

GPDO Class	Schedule 2 Reference	Development Requiring Planning Permission
Class A	Part 1, Class A	Enlargement, improvement or other alteration of a dwellinghouse fronting a relevant location
Class B	Part 1, Class B	Roof enlargement or addition where the alteration would affect a slope fronting a relevant location (including hip-to-gable conversions)
Class C	Part 1, Class C	Any other roof alteration, including installation, alteration or replacement of a chimney stack on a front slope
Class H	Part 1, Class H	Installation, alteration or replacement of a satellite antenna on a dwellinghouse or within its curtilage fronting a relevant location

Planning permission is therefore required for any of the above categories of development within the ASC. This triggers full assessment against national, regional, and local planning policy. Permission is not automatic and may be refused.

The Direction exists because works of these types, if left uncontrolled, cause incremental and cumulative harm to the estate's special character. LBWF's own evidence base for the Direction

(Highams A41, 2019) documented the harm already caused by pre-Direction conversions and identified specific streets, including Keynsham Avenue, where that harm was most visible.

1.3 Highams Park Neighbourhood Plan (2020, amended 2025)

The Highams Estate falls within the Highams Park Neighbourhood Plan area. The Plan carries statutory weight under the Planning and Compulsory Purchase Act 2004 (as amended by the Localism Act 2011) and forms part of the Development Plan. Particularly relevant policies are:

- Policy CDP1 — Development within the ASC must respect its distinctive features.
- Policy CDP2 — Development must be of high-quality design and complement the existing character.

1.4 Waltham Forest Local Plan LP1 (adopted 2024)

Part 1 of the Waltham Forest Local Plan was adopted in 2024. Particularly relevant policies are:

- Policy 76 — Highams Area of Special Character: development must protect the architectural and historic significance of the ASC.
- Policy 53 — Delivering High Quality Design: development must enhance local character in relation to the architectural integrity of the existing building and surrounding area.

1.5 Local Heritage List (2024)

In 2024, LBWF added Montalt Villas and 19 Crealock Grove to its Local Heritage List. Applications affecting these properties carry additional policy weight beyond the standard ASC designation.

Part 2 | National Planning Policy

2.1 National Planning Policy Framework (December 2024)

The NPPF is the primary national planning policy document in England. All local planning authorities must determine applications in accordance with the Development Plan unless material considerations indicate otherwise. Particularly relevant chapters are:

- Chapter 12 (Paras 130–131) — Development must respond positively to local character and history. Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area.
- Chapter 16 (Paras 202–209) — Harm to non-designated heritage assets must be weighed against the public benefits of the proposal. Significance is assessed with regard to rarity: the fewer intact surviving examples of a character-defining feature remain, the greater the weight to be given to each one.

2.2 Significance and Rarity

The Highams Estate was designed with up to eight distinct house types (A–H). Not all types are evenly distributed across the estate. Under NPPF paragraph 202, significance is partly a function of rarity: where intact matched pairs of a particular house type are rare, the significance of each surviving example is correspondingly greater.

Each post-Direction approval of a hip-to-gable conversion narrows the pool of surviving intact pairs. That loss increases, rather than decreases, the significance of those which remain. An assessment approach that treats each new conversion as evidence that further conversions are acceptable inverts that logic and, over time, makes the Article 4 Direction unenforceable in practice.

2.3 Legal Duty on the Council

Under Section 38(6) of the Planning and Compulsory Purchase Act 2004, the council is required to determine applications in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan for the Highams Estate comprises:

- Waltham Forest Local Plan LP1 (2024) — in particular Policies 53 and 76.
- Highams Park Neighbourhood Plan (2020, amended 2025) — Policies CDP1 and CDP2.
- LBWF Unitary Development Plan 2006 — Policy BHE1 (retained as a material consideration).

No applicant can override this duty by asserting personal benefit or citing earlier (pre-Direction) conversions as precedent.

Part 3 | Decision Framework

The table below sets out HRA's position on planning applications within the ASC, by development type. The framework is applied by first identifying the development type, then verifying which Article 4 Direction classes are engaged, then assessing the proposal against the ASC Design Guidance Leaflet and the policies in Parts 1 and 2 above.

Development Type	Reason for HRA Engagement	HRA Position	A4D Class(es)
Hip-to-gable roof conversion (front or side elevation)	Removes a character-defining hipped roof visible from a public road. Engages A4D Class B. Creates asymmetry within a semi-detached pair; the adjoining property is then very likely to follow, resulting in permanent loss of both hips.	OBJECT	Class B
Roof enlargement or dormer (front slope)	Affects the clean, uninterrupted roofscape. Engages A4D Class B. Assessed for scale, profile, and whether materials match the host property.	OBJECT	Class B / C
Chimney removal or alteration	Chimney stacks are a defining feature of the estate roofscape and are explicitly identified as such in the ASC Design Guidance Leaflet. Engages A4D Class C.	OBJECT	Class C
Two-storey or first-floor side extension	Infills the characteristic openness between dwellings and builds above garage level. Engages A4D Class A. Likely harmful to the estate's consistent spacing and scale.	OBJECT	Class A
Satellite dish on front elevation	Detracts from the uniform appearance of the streetscene. Contrary to ASC Design Guidance Leaflet. Engages A4D Class H.	OBJECT	Class H
Flat-roof extension (any position)	Incompatible with the estate's exclusively pitched, clay-tiled roof form. Contrary to published design guidance on materials and roof form.	OBJECT	Class A or B
Rear single-storey extension in sympathetic materials	Not covered by the A4D where not visible from a relevant location. Assessed for scale, materials, and neighbour impact. Low concern if matching brick and clay tiles are used.	ABSTAIN or SUPPORT	None
Extension in matching materials, hipped roof form, appropriate scale	Demonstrates positive regard for ASC character. Uses matching brick, clay tiles, hipped roof form, and appropriate scale.	SUPPORT	None
New dwelling or plot subdivision	Must be assessed for impact on plot-size consistency, openness, and scale. Historically resisted by HRA. Likely contrary to the estate's low-density character.	OBJECT (unless exceptional)	Class A likely

Development Type	Reason for HRA Engagement	HRA Position	A4D Class(es)
Works to Locally Listed Building (Montalt Villas or 19 Crealock Grove)	Locally Listed 2024. Any proposal affecting their significance requires a representation. Additional policy weight applies beyond the standard ASC designation.	OBJECT if harmful; SUPPORT if enhancing	Varies
Internal alterations or rear works fully screened from public road	Does not engage the A4D. No material heritage impact on the ASC.	ABSTAIN	None

Part 4 | How HRA Applies the Framework

4.1 Step-by-Step Process

1. Search PlaceHub (placehub.walthamforest.gov.uk) for the application. Confirm the address and description of works.
2. Verify that the site falls within the ASC boundary. If in doubt, contact LBWF's Conservation Officer.
3. Identify whether the works are visible from a public road or footway. If not visible, the Article 4 Direction does not apply, but ASC design policy still does.
4. Identify which Article 4 Direction classes are engaged.
5. Cross-reference the proposal against the ASC Design Guidance Leaflet.
6. Identify the house type (A–H if known) and whether the property forms part of an intact matched pair.
7. Select the appropriate response from the decision framework in Part 3.
8. Submit a formal representation via PlaceHub or to planning.policy@walthamforest.gov.uk before the consultation deadline.

4.2 Rarity Argument

Where a proposal affects a surviving intact matched pair, or a house type that is rare on the estate, HRA will invite the planning officer to confirm how many intact, unaltered examples of that design type remain.

The Council's own Article 4 Evidence Base (2019) acknowledged that many character-defining features had already been lost before the Direction came into force.

Those that survive carry correspondingly greater significance under NPPF paragraph 202.

4.3 Pre-Direction Conversions are Not Precedent

Where an officer or applicant cites pre-Direction hip-to-gable conversions on the estate as supporting precedent, HRA will note that those conversions took place before planning permission was required. They do not represent planning decisions in favour of such works.

The purpose of the Direction was precisely to interrupt that pattern of harm, and approving further conversions on the basis of pre-Direction losses inverts the Direction's purpose.

4.4 Conditions in the Event of Approval

Where outright refusal does not appear achievable, HRA requests that conditions are imposed covering as a minimum:

- Roof tiles: clay plain tiles matching the colour, profile, and texture of the existing, approved in writing prior to commencement.
- Ridge height: not to exceed the existing ridge height of the host dwelling.
- Removal of further permitted development rights: no further enlargement, improvement, alteration or addition to the roof or front and side elevations without prior written approval of the LPA, to protect the character of the Highams ASC.

4.5 Committee Referral

Where HRA objects and the officer appears minded to approve, HRA requests that the application is referred to the Planning Committee for determination rather than decided under delegated powers, and that HRA is notified of the decision prior to issue.

Part 5 | Template Objection Letter

The following template is used as the basis for formal representations to LBWF Planning. It is tailored with the specific application reference, property address, description of works, and relevant arguments before submission.

HIGHAMS RESIDENTS' ASSOCIATION

Highams Estate, Woodford Green, London | highamsra@gmail.com | www.highamsra.org

FAO: Development Management
London Borough of Waltham Forest
Planning Department, The Magistrates
Waltham Forest Town Hall Complex
Forest Road, London E17 4JF
planning.policy@walthamforest.gov.uk

[DATE]

Re: Formal Objection — Planning Application Ref: [APPLICATION REFERENCE]

Address: [FULL ADDRESS OF APPLICATION SITE]

Dear Planning Officer,

Highams Residents' Association (HRA) was founded in 1955 and represents residents of the Highams Estate, Woodford Green. It is a constituted residents' association (Constitution 2013) and assesses planning applications within the Highams Area of Special Character against a published Planning Response Framework, available at www.highamsra.org. That framework sets out the policy basis for each position taken, including the Article 4 Direction, the ASC Design Guidance Leaflet, and relevant NPPF paragraphs. It is applied on a case-by-case basis against those references, not as a standalone test of symmetry or consistency.

A. Description of Concern

[DESCRIBE THE PROPOSED DEVELOPMENT AND ITS SPECIFIC IMPACT ON THE CHARACTER AND APPEARANCE OF THE HIGHAMS AREA OF SPECIAL CHARACTER.

Example: The proposal involves a hip-to-gable roof conversion on the front elevation of [address]. This would convert the hipped roof, a defining and near-universal feature of the estate's roofscape, to a gable end, creating a permanent asymmetry with the adjoining semi-detached property. Nos. [X] and [Y] represent [one of the few remaining / the only surviving] intact matched pairs of this house type on the estate. The significance of this pair is increased by the rarity of intact surviving examples (NPPF Para 202).]

B. Planning Policy Basis

This application falls within the Highams Area of Special Character (ASC), the only such designation in the London Borough of Waltham Forest, designated in 1988. The application is also subject to the Article 4 Direction confirmed on 11 March 2020 and in force since 2 September 2020.

The Residents' Association submits that the proposal is contrary to the following:

Waltham Forest Local Plan LP1 (2024), Policy 76 — development must protect the architectural and historic significance of the ASC.

Waltham Forest Local Plan LP1 (2024), Policy 53 — development must enhance local character in relation to the architectural integrity of the existing building and surrounding area.

Highams Park Neighbourhood Plan (2020, amended 2025), Policies CDP1 and CDP2 — development within the ASC must respect its distinctive features and be of high-quality design. LBWF Unitary Development Plan 2006, Policy BHE1 — the Council must use its planning powers to avoid harmful changes within the ASC.

LBWF Highams ASC Design Guidance Leaflet — [hipped roofs / chimney stacks / consistent spacing: amend as appropriate] are identified as character-defining features that should be retained.

NPPF (December 2024), Chapter 12 (Paras 130–131) — development that fails to respond positively to local character should be refused.

NPPF (December 2024), Chapter 16 (Paras 202–209) — harm to non-designated heritage assets must be weighed against public benefits. No public benefit is identified by the applicant that outweighs the harm.

[IF APPLICABLE — RARITY ARGUMENT:] The property at [address] is one of [few / the only surviving] intact, unaltered examples of [house type / matched pair of this design type] on the estate. The rarity of surviving examples increases their significance under NPPF Para 202. HRA invites the planning officer to confirm how many intact, unaltered examples of this design type remain. The Council's own Article 4 Evidence Base (2019) acknowledged that many character-defining features had already been lost; those which survive carry correspondingly greater weight.

[IF APPLICABLE — EVOLVED CHARACTER COUNTER-ARGUMENT:] The Residents' Association anticipates that the officer may rely on the existence of previous hip-to-gable conversions on the estate as evidence that its character has evolved to accommodate such changes. The Article 4 Direction was confirmed in 2020 specifically to arrest that process. The Council's own evidence base for the Direction documented Keynsham Avenue as a street where cumulative harm had already occurred. Each further approval increases, rather than diminishes, the significance of surviving intact pairs under NPPF Para 202.

C. Legal Obligation on the Council

Under Section 38(6) of the Planning and Compulsory Purchase Act 2004, the Council is required to determine this application in accordance with the Development Plan unless material considerations indicate otherwise. The ASC designation, the Article 4 Direction, Local Plan LP1 Policy 76, and Neighbourhood Plan Policies CDP1 and CDP2 collectively constitute strong Development Plan policy support for refusal.

D. Conditions Required in the Event of Approval

HRA's primary position is that this application should be refused. Should the Council be minded to approve, HRA requests the following conditions as a minimum: clay plain tiles matching the existing; ridge height not to exceed the existing; removal of further permitted development rights for the roof and front and side elevations.

E. Conclusion

For the reasons set out above, Highams Residents' Association respectfully requests that the London Borough of Waltham Forest refuses this application. Should the planning officer be

mindful to approve, we request: (a) that all conditions above are imposed in full; (b) that the application is referred to the Planning Committee for determination rather than decided under delegated powers; and (c) that HRA is notified of the decision prior to issue.

Yours sincerely,

[NAME]

[ROLE]

Highams Residents' Association

highamsra@gmail.com | www.highamsra.org

Part 6 | Policy References

All HRA representations are made with reference to the following policies and instruments.

Policy or Instrument	Relevance
LBWF Unitary Development Plan 2006, Policy BHE1	Urban Design — requires the council to use its planning powers to avoid harmful changes within the ASC
Waltham Forest Local Plan LP1 (2024), Policy 76	Highams Area of Special Character — development must protect the architectural and historic significance of the ASC
Waltham Forest Local Plan LP1 (2024), Policy 53	Delivering High Quality Design — development must enhance local character and architectural integrity
Highams Park Neighbourhood Plan (2020, amended 2025), Policies CDP1 and CDP2	Development within the ASC must respect its distinctive features and be of high-quality design
Article 4 Direction — confirmed 11 March 2020, in force 2 September 2020	Removes permitted development rights for Classes A, B, C, H within the ASC
Highams ASC Design Guidance Leaflet (LBWF / HRA)	Co-published design guidance on roofs, materials, chimneys, windows, and extensions
LBWF Local Heritage List (2024)	Montalt Villas and 19 Crealock Grove are locally listed; additional policy weight applies to proposals affecting them
NPPF (December 2024), Chapter 12 (Paras 130–131)	Development that fails to respond positively to local character should be refused
NPPF (December 2024), Chapter 16 (Paras 202–209)	Harm to non-designated heritage assets must be weighed against public benefits; significance is assessed with regard to rarity
Planning and Compulsory Purchase Act 2004, s.38(6)	Applications must be determined in accordance with the Development Plan unless material considerations indicate otherwise
LBWF PlaceHub Planning Register	placehub.walthamforest.gov.uk/planning

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