

Statement of Common Ground

March 2022

1. Parties

- The Mayor of London / Greater London Authority
- The London Borough of Waltham Forest

2. Context / Need for a Statement of Common Ground

- 2.1. The Council requested an opinion in July 2021 on whether amendments to the draft Local Plan 1 – Strategic Policies (LP1) were necessary following the formal publication of the London Plan 2021 in order to bring it into general conformity.
- 2.2. The opinion of the Mayor is that as currently written the draft Plan (LP1) is not in general conformity with the London Plan 2021 due to the proposed approaches to the management of the borough’s industrial land and its approach to tall buildings.
- 2.3. Since this time, officers from the GLA and the Council have positively engaged to resolve these issues of conformity.

3. Industrial Land

- 3.1. The Council in discussion with the GLA has proposed the following solutions to address these conformity issues with regards industrial land:

Note that proposed additional text is **highlighted in bold and underlined**.

Modified text to be deleted is ~~struck through~~

GLA comment	WF response	Commentary
<p>Policy 25 needs to provide:</p> <ul style="list-style-type: none"> • a clear commitment that and how (through evidence) the viability and deliverability of industrial demand (additional and re-provision) will be ensured through LP2, the 	<p>PROPOSED MODIFICATION:</p> <p>Policy 25</p> <p>Opportunities for employment growth in Waltham Forest will be maximised to ensure there is sufficient capacity to deliver a minimum of 52,000sqm of additional employment floorspace across the borough, <u>and protect the borough’s SIL capacity</u> over the plan period by:</p> <p>...</p> <p>D) <u>Promoting industrial intensification through site allocations in LP2, the Industrial Intensification SPD and the subsequent development of industrial masterplans (in line with Policy 30 and London Plan Policy E7) to facilitate the intensification of industrial capacity, and ensure that the SIL capacity is at a minimum maintained, whilst also delivering an uplift in terms of overall industrial</u></p>	<p>It is agreed that the modification proposed addresses the issue raised</p> <p>The viability and deliverability of industrial supply to meet identified demand remains a concerns, but the GLA is satisfied that commitments and mechanisms</p>

<p>SPG, and a tailored monitoring arrangement to track progress</p> <ul style="list-style-type: none"> a clear indication of the role that the North Circular SIL and the Cork Tree Retail Park will play in meeting the additional need <p>The Policy should also include in detail the role of LP2 and the SPD in the planning and delivery of the required industrial capacity.</p> <p>Policy 25 should set out where spatially within the borough the majority of the additional employment floorspace (in particular B8) is proposed to be delivered</p>	<p>capacity. Where it does not lead to an overall loss of employment floorspace across the borough.</p> <p><u>E) Plans for the reconfiguration of SIL across the borough will be captured in LP2, to comprise a framework for managing change in the borough’s industrial areas which will include meeting identified need and the reprovision of the SIL capacity brought about as a result of the proposed reconfiguration of Blackhorse Lane SIL¹.</u></p> <p>Footnote <u>1. The proposed reconfiguration of Blackhorse Lane SIL involves delivering an increase in total industrial floorspace in this location and redesignating the central and southern subareas of the site as LSIS as part of the masterplan proposal. In order to maintain SIL capacity it is proposed to designate Cork Tree Retail Park as SIL and to demonstrate its viability/deliverability through LP2. This represents a specifically agreed situation in which SIL release will occur ahead of its reprovision. The redesignation of part of the SIL at Blackhorse Lane to LSIS will be reflected in LP2 – Site Allocations, including figures for reprovision of the overall amount of floorspace and of SIL capacity, when these are finalised through the agreement of the masterplan. The exact boundary will be defined in the masterplan and adopted in LP2.</u></p> <p>The Council proposes to upgrade the industrial designation of Cork Tree Retail Park (LSIS in LP1), to Strategic Industrial Location.</p> <p>PROPOSED MODIFICATION:</p> <p>Table 3.2, p.247.</p> <table border="1" data-bbox="497 1592 975 2020"> <thead> <tr> <th>Changes to Policies Map</th> <th>Change</th> <th>Figure 3.x</th> </tr> </thead> <tbody> <tr> <td>Strategic Industrial Locations</td> <td><u>Inclusion of additional SIL at Cork Tree Retail Park</u></td> <td>8</td> </tr> <tr> <td></td> <td>Amendments to SIL4 and</td> <td></td> </tr> </tbody> </table>	Changes to Policies Map	Change	Figure 3.x	Strategic Industrial Locations	<u>Inclusion of additional SIL at Cork Tree Retail Park</u>	8		Amendments to SIL4 and		<p>are put in place to address these concerns through LP2 in particular.</p>
Changes to Policies Map	Change	Figure 3.x									
Strategic Industrial Locations	<u>Inclusion of additional SIL at Cork Tree Retail Park</u>	8									
	Amendments to SIL4 and										

	SIL7 to correct drafting errors in previous version of the map.	
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Figure 3.8, p.255 - Updated map showing SIL [Appendix I]

Additional supporting text is proposed to highlight the areas of focus for the delivery of additional employment floorspace and are to be included in Figure 9.1, p.74 [Appendix III].

PROPOSED MODIFICATION:

New paragraph **9.10**

To deliver on the objectively assessed economic needs of the plan, development of industrial capacity should be guided to the most suitable locations.

The largest identified need for economic purposes is for B8 floorspace to support the logistics and distribution sectors. This need amounts to an additional c.36.5k sqm of floorspace to be provided.

New paragraph 9.11 In Waltham Forest there are two broad areas which contain sites which can best meet these requirements. These areas are illustrated in Figure 9.1, p.74

The first is the North Circular Strategic Location, which benefits from connectivity to the A406 North Circular Road, and large, relatively consolidated land ownership. The second is in the south of the borough, around the Lea Bridge and Leyton Strategic Locations, which have excellent strategic road network connectivity provided by the A12, and proximity to Central London.

As the most suitable, well-located and sustainable locations for the delivery of new and additional floorspace for distribution and servicing, development proposals should seek to optimise the capacity which these sites present when preparing masterplans and planning applications.

	<p><u>New paragraph 9.12 The role of LP2 – Site Allocations will be to establish the capacity which is required to be provided on specific sites, in order to meet the borough’s SIL-type/B8 industrial land needs.</u></p> <p><u>The viability and deliverability of industrial supply (to meet additional B8 floorspace and re-provision for any loss) will be ensured through LP2, the Industrial Intensification SPD, and a tailored monitoring arrangement to track progress.</u></p> <p>New paragraph <u>9.13</u> <u>Any development proposals on SIL will be required to ensure that the supply of floorspace which is protected as SIL is maintained and where possible increased. Proposals for masterplans involving the intensification and consolidation of SIL will be required to ensure that the SIL capacity is at a minimum maintained, whilst also delivering an uplift in terms of overall industrial capacity. Any such proposals will be reflected in the next DPD to be submitted.</u></p>	
<p>Paragraph 9.7 should now include additional demand as a result of the reconfiguration of Blackhorse Lane SIL</p>	<p>PROPOSED MODIFICATION</p> <p>9.7 The need for different uses is identified as being for: ... <ul style="list-style-type: none"> • 36,604sqm of distribution space (B8) ... <u>This need is to be considered alongside any additional need for SIL capacity brought about by the proposed reconfiguration of Blackhorse Lane SIL.</u></p>	
<p>Identification of key actions to facilitate delivery of industrial intensification in the most suitable specific locations to be included in the emerging Industrial Intensification SPD</p>	<p>The Council is committed to the preparation of an SPD which will identify key actions to deliver intensification.</p> <p>As part of the SPD, the Council will indicate the actions which are being taken including masterplanning, and detailed site allocations.</p> <p>The SPD will provide an overview of the locations which are considered to be most appropriate for various types of industrial uses, in order to guide development to the most suitable and sustainable sites.</p>	<p>It is agreed that this commitment addresses the issue raised</p>

<p>A clear monitoring framework for the delivery, phasing and review of the additional industrial floorspace requirements</p>	<p>The Council will commit to closely monitoring the supply of industrial capacity and is content to agree further information sharing with the GLA in this regard beyond the arrangements for the sharing of data through the Planning London Datahub. The purpose of such monitoring and data sharing will be to clearly establish the baseline and effects of proposals which have an effect on industrial land counting both the SIL-specific capacity, and the industrial capacity of particular uses, as outlined in Table 5.3 of LP1.</p> <p>PROPOSED MODIFICATION:</p> <p><u>Managing Supply of Industrial Land</u> New paragraph 20.38</p> <p><u>Table 5.3 within Appendix 5 'Monitoring Indicators and Targets' of this Local Plan sets out further details for monitoring delivery of the Borough's requirement for industrial land. The Council is committed to sharing this monitoring information with the GLA to support decision making when considering proposals which affect industrial designations and in particular any which affect SIL. Monitoring of the borough's industrial capacity will help to ensure that industrial need is identified, reviewed and met ahead of any planned release. It will help facilitate the effect operation of the Plan's industrial policies</u></p>	<p>It is agreed that this commitment addresses the issue raised</p>
<p>Deletion of proposed Modification SOPC055 which gives the masterplan approach an inappropriate level of flexibility that could facilitate the erosion of industrial floorspace. If co-location is proposed, the typologies, quantity and quality of the industrial replacement should reflect local need</p>	<p>The Council agrees that proposed modification SOPC055 introduces too much flexibility and it is agreed to delete this proposed modification.</p>	<p>It is agreed that the modification proposed addresses the issue raised</p>

<p>and viability over time.</p>		
<p>Within Policy 26 a reference to London Plan Policy E4(A) to provide a more comprehensive range of use types for SIL that better reflect the London Plan</p>	<p>The London Plan enumerates more ‘industrial-type activities’ set out in Part A of Policy E4 Land for industry, logistics and services to support London’s economic function than the Local Plan outlines at Part A of Policy 26.</p> <p>Policy 26 and 27 could better correspond to the uses supported by the London Plan in industrial locations, and it is agreed to propose a modification to insert the line, <u>‘and other uses supported by the London Plan at E4A’</u> to Policy 26A and 27A.</p> <p>Policy 26 - Safeguarding and Managing Strategic Industrial Land (SIL)</p> <p>To safeguard and manage SIL: A. The following uses are acceptable: i. Light industrial (Class E G iii); ii. General industry (Class B2); iii. Storage or Distribution (Class B8); iv. Waste sites (B2/B8/Sui Generis); and <u>v. other uses supported by the London Plan at E4A;</u> <u>and</u> vii. Uses ancillary to the above;</p> <p>Policy 27 - Safeguarding and Managing Change in Locally Significant Industrial Sites (LSIS)</p> <p>To safeguard and manage LSIS: A. The following uses are acceptable: i. Light industrial (Class E G iii) ii. General industry (Class B2) iii. Storage or Distribution (Class B8) iv. Waste sites (B2/B8/Sui Generis) <u>v. other uses supported by the London Plan at E4A;</u> <u>and</u> vii. Uses ancillary to the above;</p>	<p>It is agreed that the modification proposed addresses the issue raised</p>
<p>Within Policy 30, part B, ‘employment’ floorspace should be replaced with ‘industrial’ floorspace</p>	<p>This forms part of a proposed change to Policy 30 in order to ensure a clear definition of capacity exists, for clarity of interpretation, and to ensure that the policy is applied as intended to industrial land – and provides effective protection of industrial capacity in the borough.</p> <p>PROPOSED MODIFICATION:</p> <p>B. Do not lead to an overall loss and seeks to provide a net increase of employment industrial floorspace capacity¹ in the SIL, <u>or</u> LSIS <u>or</u> BEA location,</p>	<p>It is agreed that the modification proposed addresses the issue raised</p>

	<p>H. Deliver intensification and consolidation of sub areas; providing <u>net positive phasing of industrial capacity by delivering industrial intensification ahead of delivering any non-industrial uses.</u></p> <p>Footnote <u>1 Industrial floorspace capacity is: The built floorspace across all complete floors (additional floors in multi-storey developments and basements where they exist); or if the site is utilised primarily for open-yard or -storage based uses, the benchmark figure for re-provision is calculated at 65% of the total site area. Where sites are in waste use, capacity will be considered in through-put terms, in line with Policy 95 – Waste Management.</u></p>	
<p>Within Policy 38 on the Blackhorse Lane Creative Enterprise Zone need to strengthen part D on the Agent of Change principle to ensure that the significance of industrial uses and their key role within the designated SIL are recognised and protected</p>	<p>The Council agrees that it is important that the significance of industrial uses in Blackhorse Lane are recognised and proposes that additional supporting text be added to Policy 38, to highlight this.</p> <p>PROPOSED MODIFICATION:</p> <p>New paragraph <u>10.21 Development proposals in the CEZ are expected to adhere to the Agent of Change principle, as set out in part D of Policy 38, ensuring that the continued industrial function of Blackhorse Lane is protected.</u></p>	<p>It is agreed that the modification proposed addresses the issue raised</p>
<p>Within critterion D of Policy 29, including a 12-month marketing requirement for employment use retention, a reference to para 6.7.5 of the London Plan would provide a more comprehensive and accurate overview of relevant requirements specifically related to non-designated industrial land that</p>	<p>The Council considers that the proposed change below brings the policy in line with London Plan Policy E7 and clarifies the relationship with LP2.</p> <p>Policy 29 - Approach to Non-Designated Employment Land</p> <p><u>A. Development for industrial and related uses</u> will be supported on non-designated employment areas where:</p> <p>A-It provides fit for purpose and high-quality business space and upgrades existing poor or old stock;</p> <p><u>B. Development which seeks to introduce residential or mixed-use elements to the employment location will only be supported where:</u></p> <p>i) B. It uses the Agent of Change principle to mitigate design and sensitivity impacts; and,</p>	<p>It is agreed that the modification proposed addresses the issue raised</p>

<p>better reflects the London Plan</p>	<p>ii) <u>It provides replacement industrial, storage, or distribution floorspace as part of mixed-use intensification; or,</u></p> <p>iii) <u>The scope for mixed-use intensification with industrial uses has been explored fully and any loss of floorspace is justified with reference to marketing evidence of at least 12 months demonstrating no reasonable prospect of the site being retained in industrial and related uses and strategic and local assessments of demand; or,</u></p> <p>iv) <u>The proposal accords with an adopted allocation in a DPD for residential or mixed-use development.</u></p>	
<p>In LP2, non-industrial uses should not be proposed in any SIL, as there is no detailed supporting evidence</p>	<p>The Council and GLA are agreed that following the application of the masterplan route, any boundary changes which are proposed to individual SILs will be reflected in the subsequent Local Plan 2 - Site Allocations (LP2) Development Plan Document.</p> <p>Other than where there exists an agreed masterplan which needs to be reflected in a DPD, as recognised by both parties, with the masterplan as the supporting evidence, there will be no potential non-industrial uses proposed in SIL in LP2.</p>	<p>It is agreed that this commitment addresses the issue raised</p>
<p>For Blackhorse Lane within the draft Site Allocations, the Mayor seeks a clear boundary between the area that is to remain SIL and the area that is to be managed for release to co-location. Both for LP1 Proposals Map and LP2, work with the GLA and landowners is required establish a clear boundary.</p>	<p>The ongoing, collaborative process to agree the masterplan in preparation for Blackhorse Lane SIL will result in a clear boundary being outlined which sets out the area which is to remain SIL, and the area which is to be released from designation as SIL- and will be redesignated as LSIS. This boundary will be set out in modifications to LP2.</p> <p>Any boundary changes to SIL will be reflected in the adopted Policies Map following the adoption of a DPD which amends boundaries.</p> <p>The Council agrees that it is required for boundaries to be formally reflected in appropriate DPDs and as such proposes modification to the supporting text to Policy 30, setting out the agreed process.</p> <p>PROPOSED MODIFICATION:</p> <p><u>9.27</u></p> <p><u>Following the development of a masterplan which is agreed by the Council and the GLA, any boundary changes which are proposed to</u></p>	<p>It is agreed that this commitment addresses the issue raised.</p>

	<u>individual designations are required to be reflected in the subsequent Development Plan Document to be prepared.</u>	
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4. Revised industrial policies

4.1. The below sets out the policies in full which are impacted by proposed changes to resolve the GLA's concerns regarding general conformity.

9 Building a Resilient and Creative Economy

Strategic Objectives

Economic recovery is a priority for the Borough in the aftermath of the COVID-19 pandemic. Grow, promote and diversify Waltham Forest's economy, including its role in the Upper Lee Valley and wider UK Innovation Corridor, by both supporting existing businesses and nurturing local growth as well as attracting inward investment. Improve life chances by improving job opportunities, upskilling residents and providing access to new skills and training opportunities locally.

9.1 Waltham Forest is a London Borough in the midst of transformative economic change consisting of strong economic growth, a growing population and a thriving creative and cultural scene. The change brings positive developments comprising of new people, businesses and regeneration. However, policies in this chapter of the Local Plan have been prepared at a time of uncertainty associated with the Covid-19 pandemic. The full effects of the pandemic on employment and employment floorspace are not yet known. These policies will be monitored and reviewed where necessary.

9.2 According to the Employment Land Study 2019, Waltham Forest's economy is shifting away from traditional industrial and manufacturing base to towards a more diverse range of activities driven by creative and digital entrepreneurs. This shift in Waltham Forest's economy has been driven by a significant increase in the number of micro and small businesses locating and growing the borough.

9.3 Prior to COVID-19, Waltham Forest was successfully transitioning from a low employment to a high employment borough. The percentage of Waltham Forest residents who are economically active (74.8%) is higher than the London average (78.1%), but lower than the national average (78.9%). The number of new business registrations grew by 98% between 2011-2018 compared to the London average of 58.5%. The median weekly pay of residents is well above the national average, at £680 per week, and is converging with the London average.(3) However, in 2018-19, 5% of residents were unemployed, ranking it 10th highest out of London's 33 Boroughs.

9.4 Prior to COVID-19, Waltham Forest's thriving economy comprised of diverse employment sectors. Recognising this, the Waltham Forest Economic Growth Strategy 2015-2020 identified key sectors within the borough to 'keep, seed and grow'.(4) These sectors are:

- Digital and creative industries
- Construction
- Professional and urban services
- Manufacturing

- Retail
- Health and social care

9.5 The Digital and Creative sectors have flourished in the Borough over the last decade, partially due to the migration of businesses from other London boroughs. In recognition of this, a Creative Enterprise Zone has been designated in Blackhorse Road (see Policy 36 Blackhorse Creative Enterprise Zone). 9.6 Waltham Forest's Employment Land Review (2019) has identified an objectively assessed need for 8,100 jobs equating to 52,000sqm of employment floorspace (identified B2, B8 and Class E Part G i, ii, iii) over the plan period. The Employment Land Audit (2020) demonstrates that this objectively assessed need can be delivered through efficient and effective use of existing employment sites.

9.7 The need for different uses is identified as being for:

- 18,848sqm of office space (Class E Part G i / ii)
- 36,604sqm of distribution space (B8)
- -4,215sqm of industrial space (Class E Part G iii /B2)

This need is to be considered alongside any additional need for SIL capacity brought about by the proposed reconfiguration of Blackhorse Lane SIL.

Policy 25 - Supporting Economic Growth and Jobs

Opportunities for employment growth in Waltham Forest will be maximised to ensure there is sufficient capacity to deliver a minimum of 52,000sqm of additional employment floorspace across the borough, **and protect the borough's SIL capacity** over the plan period by:

- A. Focusing the delivery of new Class E Part G iii, B2 and B8 floorspace in SIL, LSIS, and non-designated employment sites;
- B. Focusing the delivery of Class E Part G i, ii floorspace in BEA and town centres;
- C. Supporting the delivery of a range of employment typologies in suitable locations, across the borough:
 - i. Distribution uses – storage and distribution floorspace (B8), in locations within good proximity of strategic road network;
 - ii. Industrial Space – light industrial (Class E, Part G iii) and the production and distribution of goods (B2) in smaller or subdivided space within the borough's designated employment sites; and
 - iii. New London Mix – high density office space (Class E Part G i and ii) ranging from small studio space, flexible co-working spaces to large offices in the designated centres or other locations with access to supporting amenities and services; and;

D. Promoting industrial intensification through site allocations in LP2, the Industrial Intensification SPD and the subsequent development of industrial masterplans (in line with Policy 30 and London Plan Policy E7) to facilitate the intensification of industrial capacity, and ensure that the SIL capacity is at a minimum maintained, whilst also delivering an uplift in terms of overall industrial capacity

E. Plans for the reconfiguration of SIL across the borough will be captured in LP2, to comprise a framework for managing change in the borough's industrial areas which

will include meeting identified need and the re-provision of the SIL capacity brought about as a result of the proposed reconfiguration of Blackhorse Lane SIL¹.

Footnote 1. **The proposed reconfiguration of Blackhorse Lane SIL involves delivering an increase in total industrial floorspace in this location, and redesignating the central and southern subareas of the site as LSIS as part of the masterplan proposal. In order to maintain SIL capacity it is proposed to designate Cork Tree Retail Park as SIL and to demonstrate its viability/deliverability through LP2. This represents a specifically agreed situation in which SIL release will occur ahead of its re-provision. The redesignation of part of the SIL at Blackhorse Lane to LSIS will be reflected in LP2 – Site Allocations, including figures for re-provision of the overall amount of floorspace and of SIL capacity, when these are finalised through the agreement of the masterplan. The exact boundary will be defined in the masterplan and adopted in LP2.**

9.8 In line with the London Plan, the 52,000 sqm additional floorspace is expected to be delivered through intensification and consolidation across existing employment areas. These are the designated employment areas of Strategic Industrial Locations (SIL) and Borough Employment Areas (BEA), in addition to the Locally Significant Industrial Sites which are introduced in this Plan. The Employment Land Audit (2020) demonstrates that it is possible to achieve this level of increase. The following policies on the management of SIL, LSIS and BEA, and Non-Designated Employment Land set out how this can be delivered. Town Centres are also a good location for offices and light industrial uses, as they are well connected and have facilities that workers may want to be close to, as well as possibility of attracting local customers.

9.9 The Employment Land Study states that the focus should be on a range of typologies to meet future demand and need. These comprise distribution uses related to logistics, industrious space, and New London Mix. Distribution space will be directed to areas across the borough which have good access to the strategic road network. New London Mix will be supported in BEAs and town centres, and this policy should be read in line with Policy 32 - Workspaces and Policy 33 - Affordable Workspace.

9.10 To deliver on the objectively assessed economic needs of the plan, development of industrial capacity should be guided to the most suitable locations. The largest identified need for economic purposes is for B8 floorspace to support the logistics and distribution sectors. This need amounts to an additional c.36.5k sqm of floorspace to be provided.

9.11 In Waltham Forest there are two broad areas which contain sites which can best meet these requirements. These areas are illustrated in Figure 3.8, p.255. The first is the North Circular Strategic Location, which benefits from connectivity to the A406 North Circular Road, and large, relatively consolidated land ownership. The second is in the south of the borough, around the Lea Bridge and Leyton Strategic Locations, which have excellent strategic road network connectivity provided by the A12, and proximity to Central London. As the most suitable, well-located and sustainable locations for the delivery of new and additional floorspace for distribution and servicing, development proposals should seek to optimise the capacity which these sites present when preparing masterplans and planning applications.

9.12 The role of LP2 – Site Allocations will be to establish the capacity which is required to be provided on specific sites, in order to meet the borough’s SIL-type/B8 industrial land needs. The viability and deliverability of industrial supply (to meet additional B8 floorspace and re-provision for any loss) will be ensured through LP2, the Industrial Intensification SPD, and a tailored monitoring arrangement to track progress.

9.13 Any development proposals on SIL will be required to ensure that the supply of floorspace which is protected as SIL is maintained and where possible increased. Proposals for masterplans involving the intensification and consolidation of SIL will be required to ensure that the SIL capacity is at a minimum maintained, whilst also delivering an uplift in terms of overall industrial capacity. Any such proposals will be reflected in the next DPD to be submitted.

Policy 26 - Safeguarding and Managing Strategic Industrial Land (SIL)

To safeguard and manage SIL:

- A. The following uses are acceptable:
 - i. Light industrial (Class E G iii);
 - ii. General industry (Class B2);
 - iii. Storage or Distribution (Class B8);
 - iv. Waste sites (B2/B8/Sui Generis); and
 - v. **other uses supported by the London Plan at E4A**; and
 - vii. Uses ancillary to the above;

B. New development will be supported on SIL, where it:

- i. Provides improved high-quality, fit for purpose employment space and infrastructure; and
- ii. Allows for future flexibility in the above uses, including future subdivision / and or amalgamation for a range of employment uses; and

C. A masterplan approach to the intensification of industrial capacity in SIL is supported (see Policy 30 - Industrial Masterplan Approach)

9.14 Strategic Industrial Locations are the capital's main reservoirs of industrial land and are of strategic economic importance for London and as such will be safeguarded. Distribution and industrial uses (Class E G iii, Class B2 and Class B8) are the main focus for these areas. Over the years, Waltham Forest has lost some of its industrial land to other uses; the remaining industrial land is therefore critical to the borough's economic success and any new development in the SIL should not lead to any overall loss of employment floorspace.

9.15 Renewal and upgrading of employment space to ensure it is high quality and fit for purpose is important. Such proposals will be supported especially where it allows for future flexibility including both subdivision and amalgamation as required to meet needs.

Policy 27 - Safeguarding and Managing Change in Locally Significant Industrial Sites (LSIS)

To safeguard and manage LSIS:

- A. The following uses are acceptable:
 - i. Light industrial (Class E G iii)

- ii. General industry (Class B2)
- iii. Storage or Distribution (Class B8)
- iv. Waste sites (B2/B8/Sui Generis)
- v. **other uses supported by the London Plan at E4A;** and
- vii. Uses ancillary to the above;

B. New development will be supported on LSIS, where it:

- i. provides improved high-quality, fit for purpose business space and infrastructure;
- ii. allows for future flexibility in the above uses, including future subdivision / and or amalgamation for a range of employment uses; and

C. A masterplan approach to the intensification of industrial capacity in LSIS is supported (see Policy 30 - Industrial Masterplan Approach)

9.16 Locally Significant Industrial Sites (LSIS) are important to the local economy. LSIS are predominantly industrial sites and complement the borough's SIL areas. The same priority uses are expected to be delivered on LSIS and SIL.

9.17 Renewal and upgrading of employment space to ensure it is high quality and fit for purpose is important. Such proposals will be supported especially where it allows for future flexibility including both subdivision and amalgamation as required to meet needs.

Policy 29 - Approach to Non-Designated Employment Land

Development **for industrial and related uses** will be supported on non-designated employment areas where:

A. It provides fit for purpose and high-quality business space and upgrades existing poor or old stock;

B. Development which seeks to introduce residential or mixed-use elements to the employment location will only be supported where:

- i) It uses the Agent of Change principle to mitigate design and sensitivity impacts; and,
- ii) **It provides replacement industrial, storage, or distribution floorspace as part of mixed-use intensification; or,**
- iii) **The scope for mixed-use intensification with industrial uses has been explored fully and any loss of floorspace is justified with reference to marketing evidence of at least 12 months demonstrating no reasonable prospect of the site being retained in industrial and related uses and strategic and local assessments of demand; or,**
- iv) **The proposal accords with an adopted allocation in a DPD for residential or mixed-use development.**

Policy 30 - Industrial Masterplan Approach

Masterplans for SIL, or LSIS will be supported where they accord with the following approach:

- A. Take a comprehensive approach and consider the whole SIL, or LSIS;
- B. Do not lead to an overall loss and seek to provide a net increase of ~~employment~~ **industrial** floorspace **capacity**¹ in the SIL, or LSIS, ~~or BEA location~~ **in line with London Plan Policy E7**;
- C. Provide uses in line with Policy 26 - Safeguarding and Managing Strategic Industrial Land (SIL) and Policy 27 - Safeguarding and Managing Change in Locally Significant Industrial Sites (LSIS), as appropriate;
- D. Provide upgraded facilities, demonstrated to be fit for purpose;
- E. Take account of the particular character of the area as identified in Appendix 2 'Employment Land Character' and evidence base, with further guidance in the Industrial Intensification SPD;
- F. Are delivered in partnership and agreement by the Council and other stakeholders including the GLA;
- G. Undertake a two-stage identification process:
 - i. Firstly, Sub Areas of Intensification and Consolidation; and
 - ii. Secondly, Sub Areas of Potential Change;
- H. Deliver intensification and consolidation of sub areas; **providing net positive phasing of industrial capacity by delivering industrial intensification ahead of delivering any non-industrial uses.** ~~ahead of any industrial release;~~
- I. Are supported by a Viability and Delivery Plan;
- J. Set out how existing businesses will be retained through a Retention and Relocation Strategy; and
- K. Are supported by a Servicing Strategy

Footnote **1 Industrial floorspace capacity is:**

The built floorspace across all complete floors (additional floors in multi-storey developments and basements where they exist); or if the site is utilised primarily for open-yard or -storage based uses, the benchmark figure for reprovision is calculated at 65% of the total site area.

Where sites are in waste use, capacity will be considered in through-put terms, in line with Policy 95 – Waste Management.

5. Tall Buildings

- 5.1. The Council has engaged positively with the GLA to refine the Tall Building policy and to ensure it reflects the character-led approach to intensification that is at the heart of the new Local Plan. The Local Plan recognises that some sites or areas in the Borough are more appropriate for greater levels of intensification and height than others and therefore sets out an approach to intensification that is derived from a reading of context and character, based on the categories of ‘Transformation’, ‘Transition’ and ‘Reinforcement’.
- 5.2. This character-led approach and definitions of ‘Transformation’, ‘Transition’ and ‘Reinforcement’ are set out in Policy 8 – “Character-led Intensification”. The approach is supported by evidence from the Characterisation and Intensification Study (2019).
- 5.3. Following constructive dialogue with the GLA, the Council proposes to modify Policy 57 – “Taller and Tall Buildings”, (which is supported by Policy 8 – “Character Led Intensification” and Policy 56 – “High Quality Design”) into two separate policies. One will be entitled “Tall Buildings” and the other “Building Heights”. This approach ensures that the definition of what constitutes a tall building in the borough is sufficiently clear. Through these modifications, it is also proposed to remove references to ‘taller’ buildings for further clarity.
- 5.4. The revised “Tall Buildings” policy conforms with Policy D9 of the London Plan by setting out the borough’s definition of tall buildings as those of 10 or more storeys. It also sets out spatial locations where tall buildings would be supported, subject to thorough contextual analysis and robust place making strategies, alongside the additional policy tests that will apply to tall buildings. Local Plan Policy 56 – “High Quality Design” is clear that all proposals will be expected to deliver high-quality design. The revised Tall Building policy sets out additional tests specific to ensuring high quality *tall buildings*.
- 5.5. Subject to the proposed modifications set out below, the GLA consider the revised policy wording to be in general conformity with the London Plan.

PROPOSED MODIFICATIONS:

A new line will be added to added to Table 3.2 (p.247) as follows:

Changes to Policies Map	Change	Figure 3.x
Tall Buildings	<u>Inclusion of sites identified for tall buildings</u>	<u>21</u>

A new Figure 3.21 – Sites Identified for Tall Buildings map [Appendix II of this statement] will be added to follow other proposed Policies Map Changes.

The wording of Policy 57, Tall Buildings, will be revised to read as follows:

Policy 57 – Tall Buildings

For the purposes of these policy tests, the definition of a tall building in the borough is any building of 10 storeys or more in height. Tall buildings will only be supported on some sites identified for a Transition or Transformation approach to character-led intensification, in line with Policy 8 of this Plan (Character-Led Intensification). These sites have been identified on Figure XX (map). The acceptability of tall buildings on these sites remains

subject to thorough contextual analysis, a robust place making strategy, and meeting the policy tests below.

In general, the appropriate range of heights for new tall buildings is between 10 and 17 storeys in height. Detailed proposals for the heights of tall buildings must be informed by, and fully satisfy all policy tests set out below.

On some transformational sites, subject to contextual analysis, a robust place making strategy, and the following policy tests being met, buildings of 18 storeys or more may be acceptable. Indicative ranges of potentially acceptable heights for these sites will be provided in Local Plan 2 (Site Allocations).

In other identified strategic locations, and subject to a Council-led assessment of local character and context, a tall building may be considered where an opportunity for transition or transformation is justified and agreed by the Council, on sites which benefit from good local public transport connectivity. Such sites will be identified in Local Plan 2 (Site Allocations) and/or other subsequent Development Plan Documents.

Any proposal for a tall building will only be supported where it fully satisfies the following policy tests, (including Visual Impacts, Environmental Impacts, Functional Impacts and Cumulative Impacts). These will apply to tall buildings in addition to the high quality design considerations set out in Policy 56 (High Quality Design) and other Building Heights considerations set out in Policy XX (Building Heights).

Visual Impacts

- i. Impact on the existing character and townscape of their surroundings considered in long-range, mid-range and immediate views;
- ii. Impact on the existing streetscape, including the provision of active frontages and sufficient, high quality public realm at ground level;
- iii. Impact on the existing, and where relevant emerging, skyline;
- iv. Contribution to existing and proposed spatial networks and hierarchies, wayfinding, and legibility;
- v. Impact on local heritage assets, their settings, and views into and from them. Heritage assets include conservation areas, listed or locally listed buildings and parks and gardens;
- vi. High quality design with careful attention paid to form and proportionality, materials, finishes, and details;

Environmental Impacts

- vii. Avoidance of harmful overshadowing or other impacts that would compromise the comfort and enjoyment of surrounding public open space, private or communal outdoor spaces, private amenity of neighbouring properties, watercourses and canals;
- viii. Avoidance of harmful environmental impacts in relation to overcrowding, overheating, wind movement, solar glare, microclimatic conditions, air, noise and light pollution and bird and bat strikes;
- ix. Use of sustainable design, materials and construction methods;

Functional Impacts

- x. Demonstration of the safety of all occupants, including considerations such as internal and external design, construction detailing, materiality, and emergency exit routes;
- xi. The impacts of servicing, maintenance, and building management on safety, quality, and enjoyment of the surrounding public realm;
- xii. Connection to public transport, walking and cycling networks and access to nearby facilities such as shops, community facilities and social infrastructure.
- i. The avoidance of interference to aviation, navigation and/or telecommunications; and

Cumulative Impacts

- ii. The cumulative visual, functional, and environmental impacts of proposed, consented and planned tall buildings in the surrounding area.

Justification text:

In the right places, and with exemplary architectural quality, tall buildings can make a positive contribution to the character and skyline of the borough. They can help to optimise the use of land and assist in accommodating the borough's anticipated growth over the coming years, providing new homes and economic opportunities. They can help people navigate through the borough by providing reference points on the skyline and drawing attention to key destinations. They can also become beacons for regeneration and stimulate further investment.

It is important to note however, that tall buildings are not always necessary to achieve intensification and good growth. For sites or areas that are sensitive to height, lower approaches to intensification are likely to be more suitable. It is also recognised that they can present a number of challenges which must be addressed and managed sensitively in the context of their immediate and wider surroundings.

The London Plan requires local authorities to define what is considered to be a tall building, as this may vary in different parts of the capital and should take into account local character and context. This is an important consideration in Waltham Forest, where there are significant variations in existing character and townscape and in sensitivity to growth and intensification. As set out in Policy 57, new tall buildings in Waltham Forest are defined as being between 10 and 17 storeys. On some sites which are likely to see extensive change, there may be opportunities for buildings over 18 storeys in height. Indicative appropriate ranges of height in these instances will be set out in Local Plan 2 (Site Allocations). This does not mean that all buildings up to these heights are automatically acceptable, such proposals will still need to be assessed in the context of other planning policies to ensure that they are appropriate for their location and do not lead to unacceptable impacts on the local area.

Policy XX – Building Heights

The existing character and context of Waltham Forest varies across the borough. Appropriate building heights will need to vary in response, in line with the approach to Character - Led Intensification set out in Policy 8 of this Plan. Table 14.1 below sets out a range of heights that are likely to be acceptable on sites that are not suitable for tall

buildings. This remains subject to thorough assessments of context and character and meeting the High Quality Design criteria set out in Policy 56.

Height and massing strategies should always come forward as positive design intentions - such as marking a location of civic, cultural, or landmark importance - rather than solely to increase density. They should contribute positively to their context and be part of a successful composition of building heights.

In line with the Characterisation and Intensification Study (2019), Policy 8 (Character-Led Intensification) of this Plan sets out an approach to intensification based on the categories of Reinforcement, Transition and Transformation. Table 14.1 below sets out indicative ranges of heights for each of these categories.

Agreed response to surrounding character	Indicative range of typical building shoulder heights	Indicative range of heights for buildings that exceed typical shoulder heights	Approach to Tall Buildings
Transformation	4-9 storeys	Refer to Policy 57 – Tall Buildings and relevant Local Plan 2 - Site Allocations	
Transition	3-5 storeys	6-9 storeys	Refer to Policy 57 – Tall Buildings and relevant Local Plan 2 Site Allocations
Reinforcement	2-5 storeys	Not appropriate, other than in exceptional circumstances where the site context and proposed land uses would be enhanced by taller buildings. In such circumstances, 6-9 storeys may be considered appropriate.	Not appropriate

Table 14.1 - Building Heights

All development proposals will be expected to address issues of height and scale with regard to the impact on the local and historic context, as set out in Historic England Advice note 4 (or equivalent) and other relevant guidance.

Justification text:

The recommended ranges of height reflect the impact that such a height could have on the generally low-rise nature of some of the borough's built environment. Above that, the ranges reflect the distinction in architecture found between existing examples in the Borough, based on the evidence provided in the Characterisation and Intensification Study (2019).

Where not already specified in Local Plan 2 (Site Allocations), development proposals will be expected to determine which approach to intensification is most appropriate given the character and context of the site under consideration. This will be subject to agreement with the Local Planning Authority, likely at pre-application stage, and will require clear and compelling justification. Allocated sites identified in Local Plan 2 (Site Allocations) will provide guidance as to whether they are appropriate for Reinforcement, Transition or Transformation.

Further site specific detail on the approach to intensification and building heights for strategic and key sites across the borough is set out in Local Plan 2 (Site Allocations), and further guidance on location, quality and composition will be found in Supplementary Planning Documents including an updated Urban Design SPD, area specific masterplans and planning/development briefs, frameworks, guides and codes.

6. Further agreed modifications

6.1. The proposed modifications below have been discussed between the GLA and Waltham Forest over several months and are considered to address any further remaining conformity issues.

GLA comment	Council's comment	Proposed change – subject to Inspectors' consideration
<p>Policy 12: Explicit recognition of London Plan housing target and making transparent the evidence how to exceed that in line with other London Plan policies such as on industrial land</p>	<p>Proposed addition to the Policy text recognising that Policy H1 requires that Boroughs must include these targets in their Development Plan Documents.</p>	<p>Policy 12 to read as follows:</p> <p>Opportunities for housing growth in Waltham Forest will be maximised to <u>deliver on and exceed the 10-year minimum target set out in the London Plan, of 1264 per annum (2019/20 -2028/29) and meet housing need in Waltham Forest as far as possible by aiming to deliver an average of 1800 per annum across the plan period.</u></p>
<p>Policy 95: Identification of safeguarded waste site at Argall Avenue in the Local Plan following adoption of North London Waste Plan</p>	<p>This is accepted and noted for inclusion on the Policies Map.</p>	<p>Policies Map to be amended accordingly.</p>
<p>Policy 19: The small sites target of 359 new homes set out in the London Plan should be mentioned in policy or supporting text, and not only in the appendix on monitoring</p>	<p>It is proposed to include a reference in the supporting text under Policy 19 – to refer to Small Sites and the London Plan target.</p>	<p>Revised text as follows:</p> <p>Paragraph 8.24 Small sites will play an important part in meeting the borough's housing needs and target. Increasing the rate of housing delivery from small housing sites is a priority. Small sites are defined as those below 0.25ha.</p> <p><u>The London Plan sets a 10-year minimum target for net housing completions on small sites. For Waltham Forest this is an annualised target of 359 net new homes.</u></p> <p>8.25 The delivery of small sites will be achieved through incremental intensification of existing residential areas and town centres, or in areas with adequate public transport accessibility,</p>

		which is considered to be PTAL 3 to PTAL 6. Additional guidance in the form of Design Codes and SPDs may be produced to assist with the accelerated delivery of such sites.		
Policy 23: The pitch target for Gypsy & Traveller sites has been included in the supporting text, but it does not explicitly refer to a ten-year timeframe, and there is no reference to auditing of existing local authority sites	This is noted.	<p>Revised text as follows: Paragraph 8.31 There are two Gypsy and Traveller sites in the borough; one at Folly Lane and another at Hale Brinks North. A Gypsy and Travellers' Needs Assessment has been commissioned to understand the level of need in the Borough. The Gypsy and Travellers' Needs Assessment has identified a requirement for two additional pitches <u>in the next 10 years</u>, under the national definition in Planning Policy for Travellers Sites. The additional pitches are expected to be met by intensification of the existing sites.</p>		
Reasons for individual industrial designation boundary changes should be included in the local plan	It is proposed to update Appendix 3 to itemise industrial designation boundary changes	Designations/proposals Change to change from 2012 Core Strategy policies map	Change	Figure 3.x
		BEA9	Removed to reflect completion of residential scheme	7
		BEA10	Removed to reflect completion of residential scheme	7
		BEA7	Removed to reflect completion non-industrial scheme	7
		...		
Policy 79: As test for planning applications on	Existing policy wording at 79B reads:	Revised text as follows:		

<p>Green Belt or MOL this should refer to 'very special circumstances' and not 'exceptional circumstances', which is used to justify changes through the local plan.</p>	<p>"B. In the event that development proposals are allowed in exceptional circumstances in Green Belt or MOL within the meaning of national policy and the London Plan" Exceptional circumstances in this case is qualified by the reference to national policy and the London Plan. The point however is taken and noted for modification once circumstances permit.</p>	<p>"B. In the event that development proposals are allowed in very special exceptional circumstances in Green Belt or MOL within the meaning of national policy and the London Plan"</p>
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7. Signatories

London Borough of Waltham Forest

Name: Ian Rae

Position: Commercial Director, Regeneration, Planning & Delivery



Signature:

Date: 21.03.2022

Greater London Authority

Name: Lucinda Turner

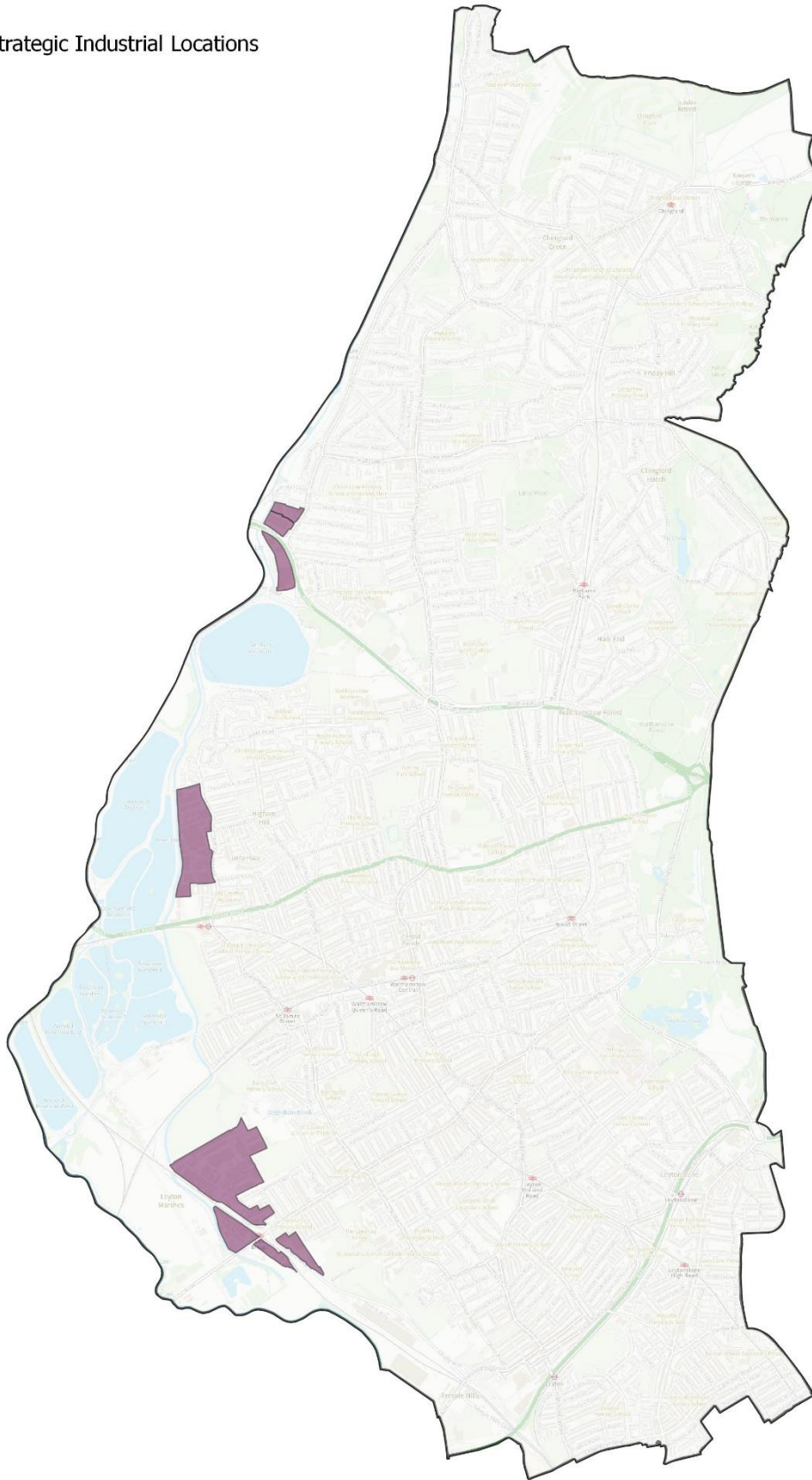
Position: Assistant Director of Planning

Signature: 

Date: 21st March 2022

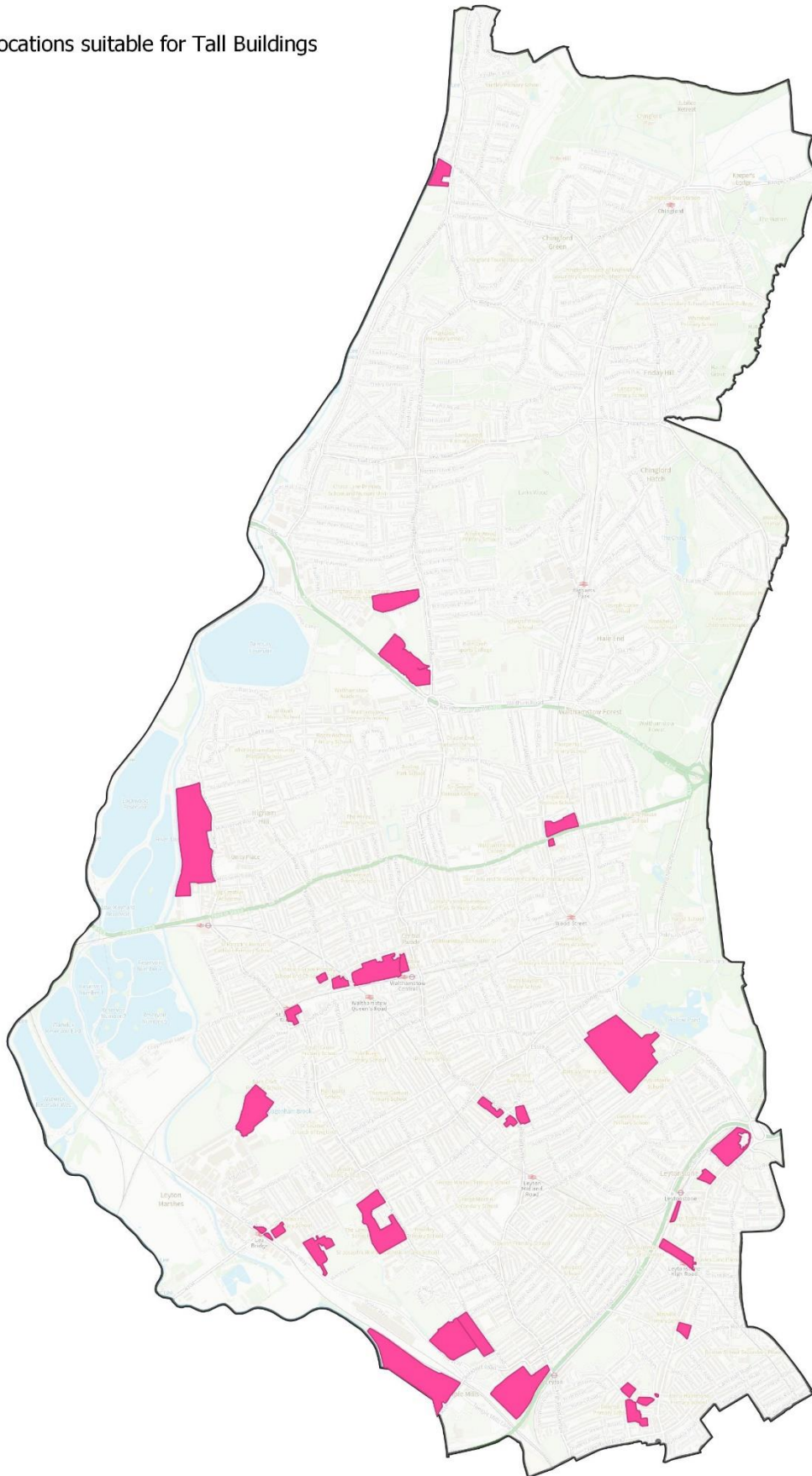
Appendix I – Updated Figure 3.8

■ Strategic Industrial Locations



Appendix II - Figure 3.21 – Sites Identified for Tall Buildings

Locations suitable for Tall Buildings



Appendix III – Figure 9.1

- Strategic Industrial Locations
- Locally Significant Industrial Sites
- Borough Employment Areas
- Broad areas for focus of additional B8 capacity
- Key routes

