

London Borough of Waltham Forest
Authority Monitoring Report 2018/19

Housing in Waltham Forest



December 2019

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1. Introduction

- 1.1. The Authority Monitoring Report (AMR) assesses the performance and effectiveness of the policies in the Waltham Forest Local Plan.
- 1.2. The requirement for a local authority to produce an Authority Monitoring Report is set out in Section 113 of the Localism Act 2011. The Act requires every authority to produce a series of reports containing information on the implementation of the Local Development Scheme, the progress and effectiveness of the Local Plan, and the extent to which the planning policies set out in the Local Plan documents are being successful in achieving their aims.
- 1.3. The Council is changing how we report on the progress and effectiveness of the Local Plan. The AMR will be prepared in a series of reports based around topic areas. In line with regulations the relevant data will be published as soon as possible following production.
- 1.4. This AMR document covers the topic area of housing: delivery of housing, performance against the borough housing target, location of growth and five year supply of deliverable sites. This document also provides an update on the progress made in respect to the Local Development Scheme.
- 1.5. The reporting year for this AMR is the financial year 2018-2019, and where relevant data will be provided for all years following the adoption of the Local Plan in March 2012.
- 1.6. The Council's Local Plan comprises the Core Strategy (adopted 2012), Development Management Policies Document (adopted 2013), Walthamstow Town Centre Area Action Plan (adopted 2014), Blackhorse Lane Area Action Plan (adopted 2015). These, along with Supplementary Planning Documents on Affordable Housing & Viability, Planning Obligations, and area-based SPDs relating to South Grove/ St James Street, and Norlington Road Industrial Site, seek to make full use of Waltham Forest's capacity for housing for a range of needs, providing quality development in the right places.
- 1.7. This AMR has been prepared with reference to updated Planning Practice Guidance, and the revised National Planning Policy Framework (February 2019).

2. Monitoring Indicators

2.1. The Waltham Forest Core Strategy (2012) sets out a series of monitoring indicators and specific targets in Appendix 3.¹

2.2. This AMR reports on a selection of indicators outlined in the Core Strategy. The report is split into three sections: Housing Delivery, Location and Management of Growth, and 5 Year Housing Land Supply.

Table 1: Key Targets relating to housing

Monitoring Indicators	Target
Housing Delivery	
H1 – Plan period and housing target	-
H2(a) – Net additional dwellings in previous 5 years	Meet the minimum target of additional homes set by the London Plan
H2(b) – Net additional dwellings for the reporting year – including net gain of housing including empty properties returned to use and non-self-contained units	Meet the minimum target of additional homes set by the London Plan
H5: Gross affordable housing completions	Provide 50% of new housing to be affordable
L9 (i) and (ii) – Affordable housing by type and tenure	Provide affordable housing at a split of 60% social rented/affordable rented and 40% intermediate affordable housing
L10 – Housing development by unit type	50% of new homes to be 3 bed or larger
LP8 – Loss and gain of Houses in Multiple Occupation (HMOs)	-
L11 (i) – Lifetime homes	All new build housing to be built to lifetime home standards (now M4(2) standards)
L11 (ii) – % of new housing developments over 10 units with wheelchair units	10% of new developments with a capacity of 10 or more units to be wheelchair accessible.

¹ London Borough of Waltham Forest, 2012, Core Strategy, p.197, (Available at: <http://static.walthamforest.gov.uk/sp/documents/adopted-core-strategy.pdf>)

H4 – Pitches for Gypsies and Travellers	Provide a minimum of (an additional) 3 pitches for Gypsies and Travellers up to 2017.
Location and Management of Growth	
LP3 – Number of site specific proposals planned for or implemented at identified opportunity sites	Adoption and implementation of 4 Area Action Plans
LP4 – Number of planning approvals for major developments within and outside the key growth areas	-
LP5 – Number of developments on green field sites (Green Belt or MOL) and those on previously developed land	No loss of Green Belt or Metropolitan Open Land
5 Year Housing Land Supply	
5 Year Housing Land Supply	Demonstrate a 5 year supply of deliverable sites

3. Housing Delivery

3.1. Plan Period and Housing Targets

Table 2: Monitoring Headlines

Monitoring Indicator:	H1: Plan period and housing targets
Relevant Policies:	CS2(A), DM2, WTC2, BHL2

3.1.1. The current housing target for Waltham Forest is 862 new homes per year, which has been the target since 2015, when the Further Alterations to the London Plan was adopted.

3.1.2. The target has changed in the plan period. The previous target was set by the 2011 London Plan, which set an initial target of 11,400 homes, equating to an annual target of 760 homes between 2011 and 2026.

Table 3: Housing delivery target from 2012-2019

Financial Year	Housing Delivery Target
2012-2013	760
2013-2014	760
2014-2015	760
2015-2016	862
2016-2017	862
2017-2018	862
2018-2019	862

3.2. Total Net Housing Delivery

Table 4: Monitoring Headlines

Monitoring Indicator:	H2(a): Net additional dwellings - in previous 5 years; H2(b)* (NI154) Net additional dwellings for the reporting year - Including net gain of housing including empty properties returned to use and non self contained units.
Target:	Meet the minimum target of additional homes set by the London Plan
Target met (2018/19):	Yes
Relevant Policies:	CS2(A), DM2

3.2.1. Waltham Forest has seen a significant increase in the level of housing delivery over the plan period, from around 500 units per year in 2012-13 and 13-14, to almost double that rate in the last few years.

3.2.2. For two out of the last three years, Waltham Forest has achieved the target set by the Mayor of London.

3.2.3. In 2015-16 the target was exceeded by 'self-contained' delivery, but due to the loss of non-self-contained accommodation and increase in the number of vacant dwellings, the net total fell just below the target of 862.

Figure 1: Total Net Housing Delivery 2012-2019

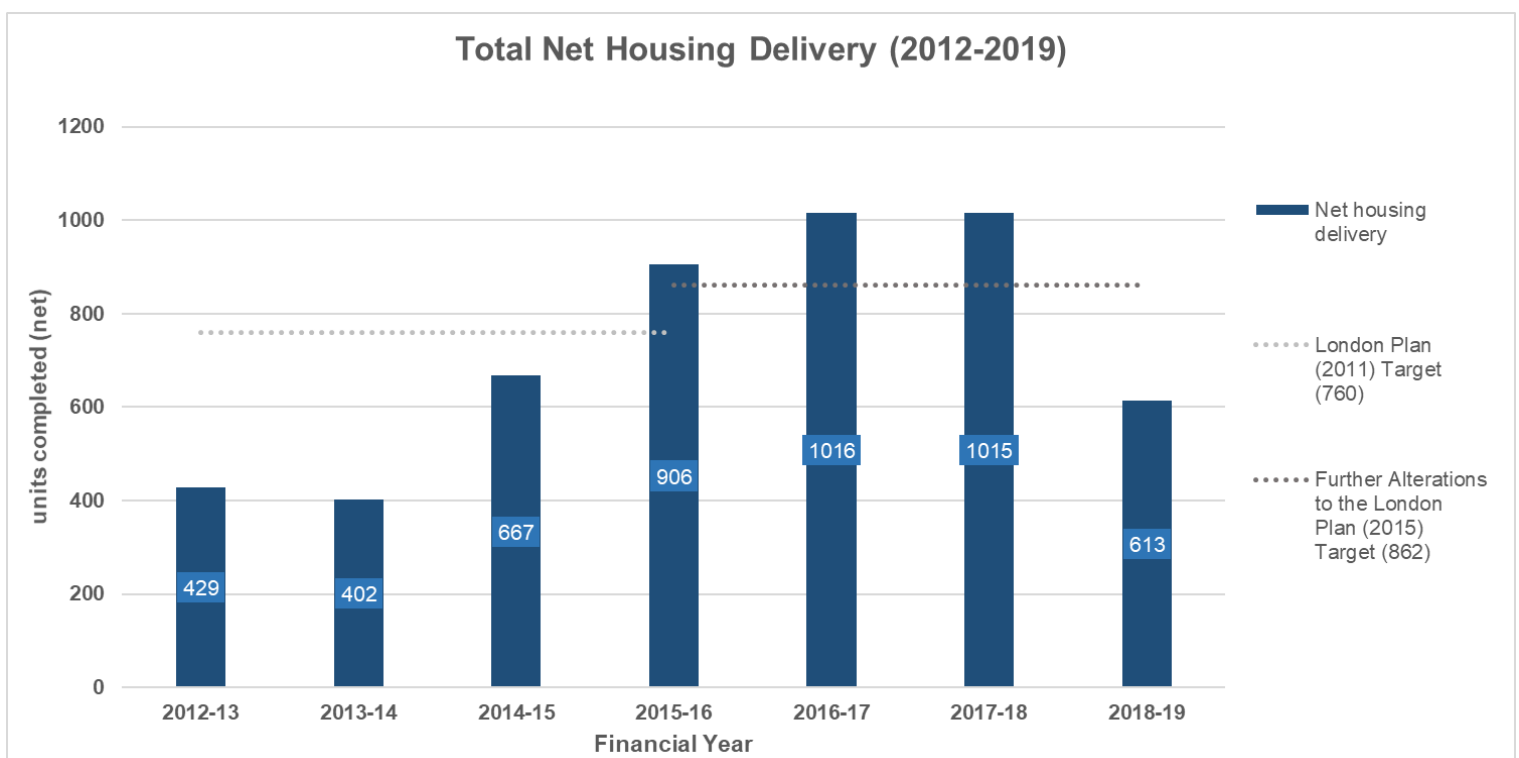


Table 5: Total Net Housing Delivery 2012-2019²

Financial Year	Net Self-Contained units	Net Non-Self –Contained units (adjusted)	Total
2012-2013	456	-27	429
2013-2014	391	11	402
2014-2015	697	-30	667
2015-2016	970	-64	906
2016-2017	1033	-17	1016
2017-2018	716	299.1	1015.1
2018-2019	613	0	613
Total	4876	172.1	5048.1

3.2.4. The total net housing delivery figure is composed of supply from ‘self-contained’ homes and ‘non-self-contained’ housing.

3.2.5. ‘Self-contained’ means that a home has all the necessities (bedroom, living, cooking and washing facilities) behind its own lockable front door.³

3.2.6. ‘Non-self-contained’ homes therefore are a form of housing which does not have these facilities. Common types of non-self-contained accommodation are purpose built student accommodation, large scale purpose built shared living developments, older persons care facilities, and hostels.

3.2.7. Planning practice guidance (PPG) provides direction on how to count contributions to housing supply from the aforementioned sources.

² The source of data for self-contained and non-self-contained housing is the London Development Database (LDD).

³ For definition source see: <https://www.gov.uk/guidance/definitions-of-general-housing-terms>

- The contribution of non-self-contained accommodation is counted according to the amount of accommodation it releases in the housing market or extent to which it allows general market housing to remain in use.
- The PPG outlines that, for student accommodation, 'to establish the amount of accommodation released in the housing market, authorities should base calculations on the average number of students living in student only households, using the published census data'.⁴ The exception here is for studio flats, which can be counted on a one for one basis.
- For student only households in Waltham Forest, the average number of students composing a household is 2.4.⁵
- Similarly, for older people's housing, the PPG outlines that, 'for residential institutions, to establish the amount of accommodation released in the housing market, authorities should base calculations on the average number of adults living in households, using the published census data'.⁶
- For older people (aged 65+) living in Waltham Forest, the average household size is 1.0.⁷

3.2.8. The reported figures for non-self-contained accommodation in Table have been adjusted accordingly, so that for every 2.4 units of student accommodation built; one equivalent unit of self-contained accommodation is counted.⁸ Likewise, as housing provided for older people has a ratio of 1:1, for every unit of older people's housing provided counts the same as a unit of self-contained accommodation.

⁴ MHCLG, 2019, Planning Practice Guidance, Paragraph: 034 Reference ID: 68-034-20190722 (Available at: <https://www.gov.uk/guidance/housing-supply-and-delivery>)

⁵ ONS Statistical Release 008207. (Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/housing/adhocs/008207ct07732011censusnumberofstudentsinstudentonlyhouseholdnationaltolocalauthoritylevel>)

⁶ MHCLG, 2019, Planning Practice Guidance, 016a Reference ID: 63-016a-20190626 (Available at: <https://www.gov.uk/guidance/housing-for-older-and-disabled-people#para016a>)

⁷ Calculated using ONS Statistical Release 008208 and DC1109EW - Household composition by age by sex (Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/housing/adhocs/008208ct07742011censusageofhouseholdreferencepersonhrpbynumberofadultsinhouseholdnationaltolocalauthoritylevel> and <https://www.nomisweb.co.uk/census/2011/dc1109ew>)

⁸ For detail on the components of non-self-contained supply, see section 3.10

3.2.9. Previously, 'long term vacant dwellings' were counted as a component of supply. These are dwellings which have been unoccupied and substantially unfurnished for over 6 months.⁹

3.2.10. PPG directs that unless an authority can prove that long term vacant dwellings have not already been counted as part of the existing stock of dwellings, the net change in their number cannot be included as a contribution to supply.¹⁰ As such, long term vacant dwellings are not incorporated into the supply detailed in Table 5.

⁹The change in long-term empty homes comes from annual statistics reported by the Ministry for Housing, Communities and Local Government (MHCLG), based on local authority Council Tax data in Live Table 615. Data for 2018/19 will be released in April 2020. For greater detail on the methodology and sources of the data in Table 615 please refer to the note accompanying the statistical release (Available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/685575/LT_615.xls) Figures are rounded to the nearest integer.

¹⁰ Planning Practice Guidance, 2019, Paragraph: 030 Reference ID: 68-030-20190722 (Available at: <https://www.gov.uk/guidance/housing-supply-and-delivery>)

3.3. Affordable Housing

3.3.1. Since 1 April 2012, 2191 units of affordable housing (gross) have been delivered in Waltham Forest.

3.3.2. In monitoring affordable housing delivery, it is important to distinguish between net and gross figures.

3.3.2.1. Net figures illustrate the overall progress made towards providing an absolute amount of affordable housing. When reporting net figures, any units which once stood on the site of completed developments have been counted as losses. This allows us to keep track of the level of supply of particular tenures over time.

3.3.2.2. Gross figures are important to consider in relation to the Council's delivery targets, to achieve certain proportions of new housing to be affordable, and of particular tenure splits. When reporting gross figures, only the newly created units as part of the development are counted.

3.3.3. Net Self-Contained Delivery — Unit Tenure

Table 6: Monitoring Headlines

Monitoring Indicator:	H2(a) – New dwellings built in previous 5 years including by dwelling size and tenure
Relevant Policies:	CS2(B), DM3

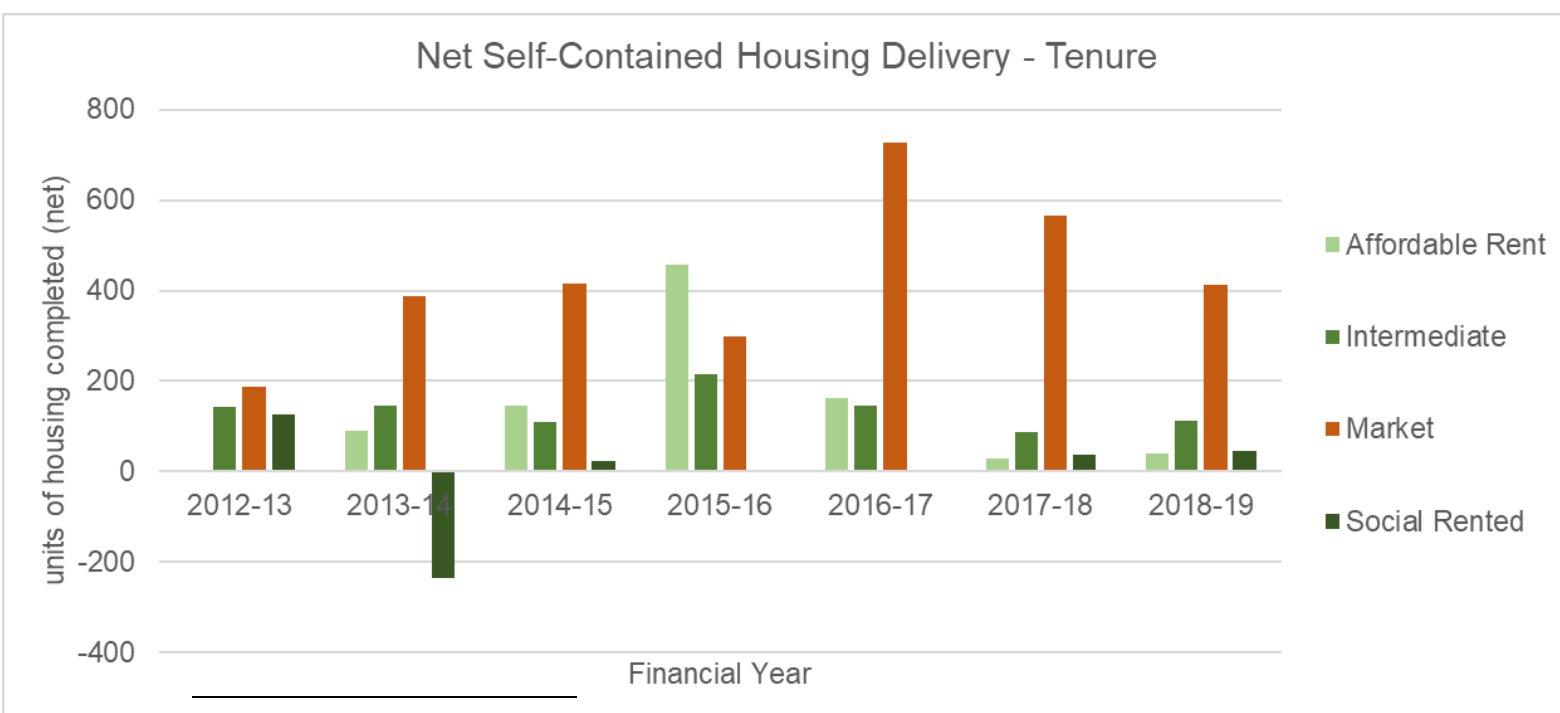
3.3.3.1. Market housing has been the most consistent contributor to Waltham Forest's housing supply. In every year bar one, since 2012, market housing has supplied the greatest proportion of units to overall supply.

3.3.3.2. 2015-2016 was unusual in that affordable rented units provided the greatest contribution, at almost 50% of the total. This was mostly attributable to the development of 'Unity Works' on Sutherland Road, and on the site of Kimberley Industrial Estate & Billet Works on Billet Road.

Table 7: Net Self-Contained Housing Delivery 2012-2019¹¹

Financial Year	Affordable Rent	Intermediate	Market	Social Rented	Total
2012-2013	0	144	187	125	456
2013-2014	90	147	388	-234	391
2014-2015	147	110	416	24	697
2015-2016	456	214	300	0	970
2016-2017	162	145	726	0	1033
2017-2018	28	87	565	36	716
2018-2019	41	113	414	45	613
Total	924	960	2996	-4	4876

Figure 2: Net Self-Contained Housing Delivery - Tenure



¹¹ All data has been extracted from the London Development Database. For information on the definitions of affordable housing, please visit: <https://www.gov.uk/guidance/definitions-of-general-housing-terms#social-and-affordable-housing>

3.3.4. Gross Self-Contained Delivery – Tenure

Table 8: Monitoring Headlines

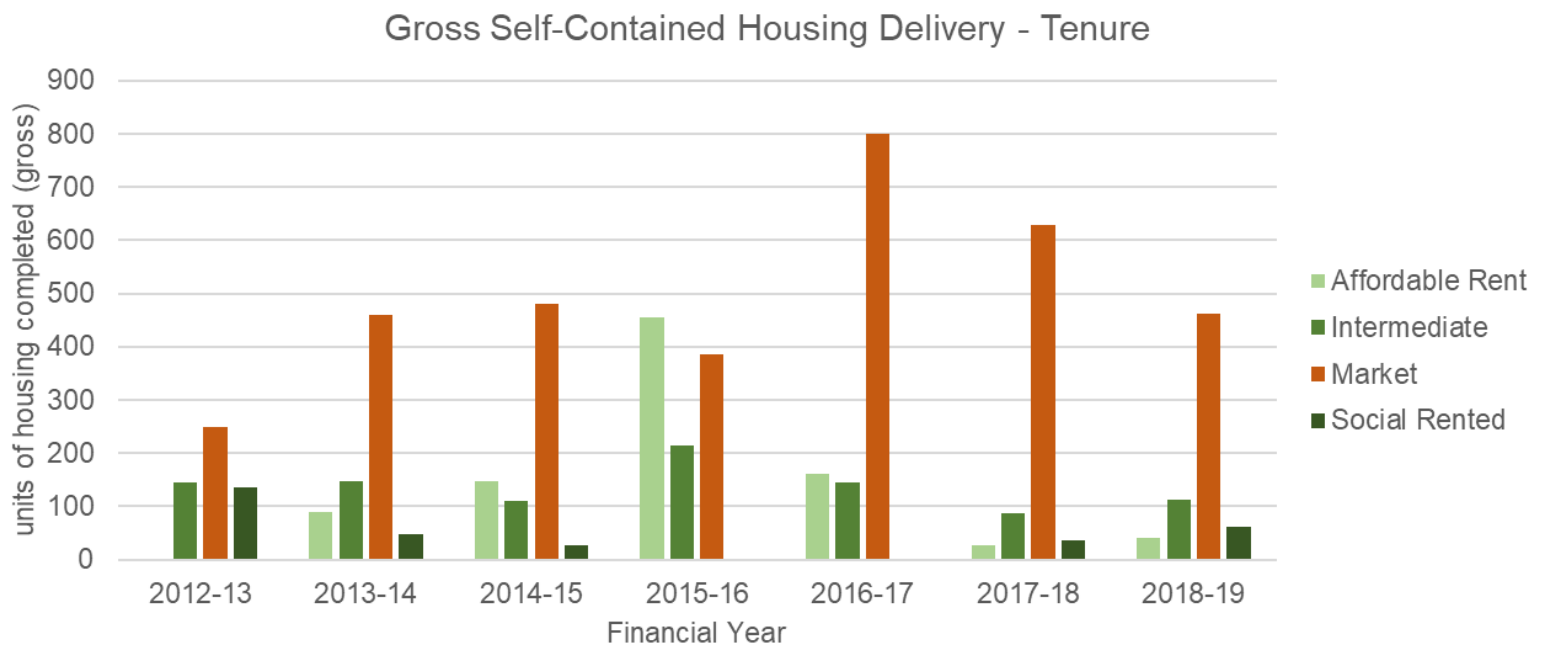
Monitoring Indicator:	H2(a) – New dwellings built in previous 5 years including by dwelling size and tenure; H5* Gross affordable housing completions. L9 (i) & (ii) – Affordable housing by type and tenure.
Target:	Provide 50% of new housing to be affordable
Target met:	No
Relevant Policies:	CS2(B), DM3

3.3.4.1. Over the plan period, just under 40% of housing delivery has been affordable, at 2191 of a total 5657 units.

Table 9: Gross Self-Contained Delivery - Tenure from 2012-2019

Financial Year	Affordable Rent	Intermediate	Market	Social Rented	Total	Total Affordable (%)
2012-2013	0	144	250	135	529	53%
2013-2014	90	147	459	47	743	38%
2014-2015	147	110	480	28	765	37%
2015-2016	456	214	386	0	1056	63%
2016-2017	162	145	801	0	1108	28%
2017-2018	28	87	629	36	780	19%
2018-2019	41	113	461	61	676	32%
Total	924	960	3466	307	5657	39%

Figure 3: Gross Self-Contained Housing Delivery - Tenure from 2012-2019



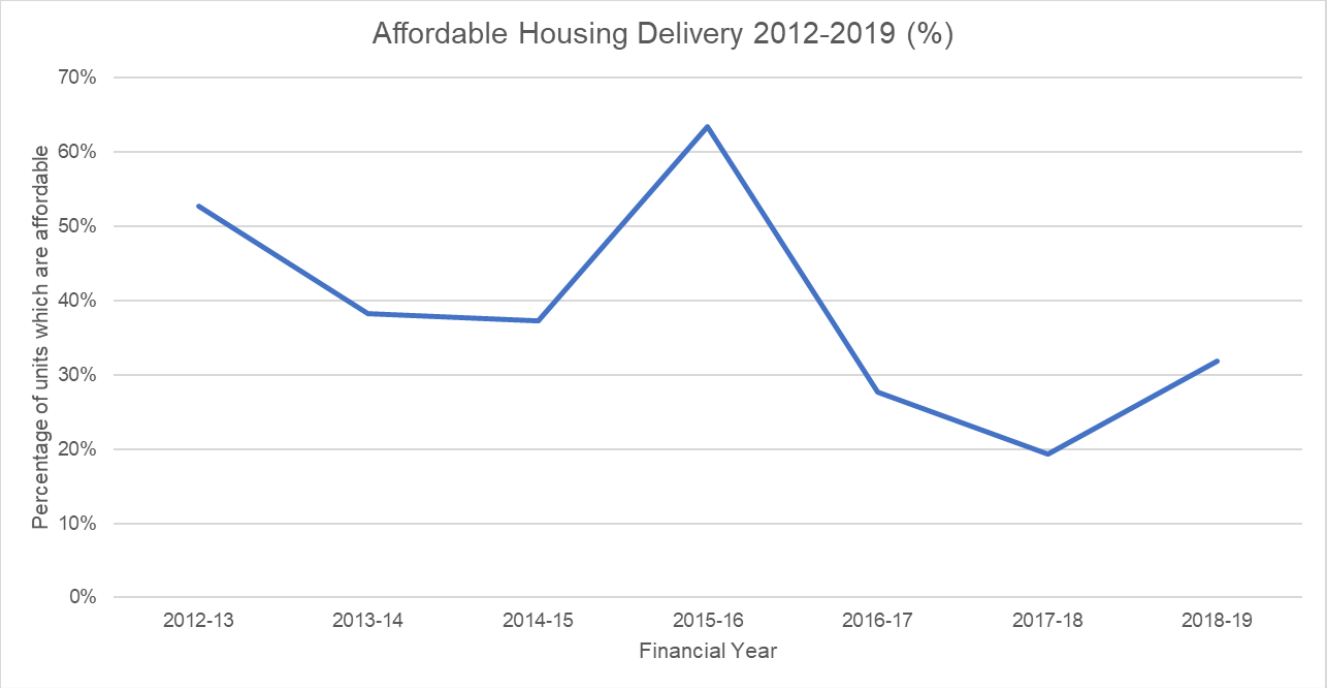
3.3.4.2. In 2015-2016 there was an especially high level of affordable housing delivered, with 456 units of affordable rented housing being delivered.

3.3.4.3. The London Plan Annual Monitoring Report 15 was published in October 2019, and identifies Waltham Forest as reporting the highest share of affordable housing by proportion across London (for the three-year period from 2015/16-2017/18), and one of only 5 boroughs to deliver in excess of 1000 units of affordable housing over the period.¹²

3.3.4.4. Over the past three years, the proportion of units delivered being affordable has fallen, with some recovery in 2018/19 (32%), taking the overall percentage for the plan period to just under 40%.

¹² GLA, 2019, London Plan Annual Monitoring Report 15. (Available at: https://www.london.gov.uk/sites/default/files/amr_15_final.pdf)

Figure 4: Gross Self-Contained Housing Delivery - Affordable Housing Delivery 2012-2019 (%)



3.3.5. Gross Self-Contained Delivery – Tenure Split

Table 10: Monitoring Headlines

Monitoring Indicator:	H5 Gross affordable housing completions.
Target:	Provide affordable housing at a split of 60% social rented/affordable rented and 40% intermediate affordable housing
Target met:	No
Relevant Policies:	CS2, DM3

3.3.5.1. The target of a 60:40 split of social rented/affordable and intermediate was designed to increase the amount of intermediate housing in the borough to provide residents on low and medium incomes with more opportunities to own their own home.

3.3.5.2. Overall, 56% of affordable housing provision has been either social rented or affordable rented, with 44% being intermediate.

Table 11: Gross Self Contained Delivery - Tenure Split - 2012-2019

Financial Year	Social Rent/Affordable Rent	Intermediate	Total
2012-2013	135	144	279
2013-2014	137	147	284
2014-2015	175	110	285
2015-2016	456	214	670
2016-2017	162	145	307
2017-2018	64	87	151
2018-2019	102	113	215
Percentage	56.2%	43.8%	-

3.4. Gross Self-Contained Delivery – Unit Size

Table 12: Monitoring Indicators

Monitoring Indicator:	H2(a) – New dwellings built in previous 5 years including by dwelling size and tenure; L10 – Housing development by unit type
Target:	50% of new homes to be 3 bed or larger
Target met:	No
Relevant Policies:	CS2, DM3, DM5

3.4.1. Table 13 shows that the majority of supply over the plan period has been from 1 and 2 bed units.

Table 13: Gross Self-Contained Delivery - Unit Size - 2012-2019

Financial Year	1 bed	2 bed	3 bed	4 bed	5+	Total	Percentage 3 bed or larger
2012-2013	216	223	68	13	9	529	17%
2013-2014	293	314	77	58	1	743	18%
2014-2015	255	381	103	26	0	765	17%
2015-2016	389	386	217	64	0	1056	27%
2016-2017	377	476	186	62	7	1108	23%
2017-2018	279	401	77	20	3	780	13%
2018-2019	272	273	115	13	3	676	19%
Total	2081	2454	843	256	23	5657	20%

3.5. Gross Self-Contained Delivery – Source of new homes

Table 14: Monitoring Headlines

Monitoring Indicator:	L10: Housing development by type
Relevant Policies:	DM4, DM5

3.5.1. New build homes have consistently been the largest contributor to overall supply.

Table 15: Gross Self-Contained Delivery - Source of new homes - 2012-2019

Financial Year	Change of use	Conversion	Extension	New Build	Part conversion part change of use	Grand Total
2012-2013	36	125	15	353	0	529
2013-2014	32	130	11	570	0	743
2014-2015	98	86	24	557	0	765
2015-2016	116	165	3	772	0	1056
2016-2017	196	126	29	756	1	1108
2017-2018	77	123	24	554	2	780
2018-2019	60	76	39	499	2	676

3.5.2. There are several types of development which compose overall supply:

- New Build refers to any new building that provides one or more new residential units, whether on a vacant site or following demolition.
- Conversion refers to the conversion of existing residential dwelling(s) to create a different number of self-contained residential dwellings.

- Change of Use refers to the change of non-residential buildings or floorspace to one or more new self-contained dwellings.
- Extensions are where dwellings are being created in a new structure which does not have its own footprint, such as an extra floor at the top of an existing building.
- Part conversion, part change of use captures when an area in non-residential use is merged with an existing residential unit to create a new, larger unit.

3.6. Gross Self-Contained Delivery – Type of new homes

Table 16: Monitoring Headlines

Monitoring Indicator:	L10: Housing development by type
Relevant Policies:	DM5

3.6.1. The majority of development delivered so far over the plan period has been flats/apartments.

Table 17: Gross Self-Contained Delivery - Type of new homes - 2012-2019

Financial Year	Cluster Flat	Flat Apartment or Maisonette	House or Bungalow	Live/Work	Studio or S/C Bedsit	Grand Total
2012-2013	0	478	40	1	10	529
2013-2014	0	600	107	0	36	743
2014-2015	0	619	115	0	31	765
2015-2016	0	859	139	0	58	1056
2016-2017	0	935	89	1	83	1108
2017-2018	9	676	69	1	25	780
2018-2019	0	602	45	0	29	676
Total	9	4769	604	3	272	5657

3.7. Determination of Applications proposing Houses in Multiple Occupation (HMOs)

Table 18: Monitoring Headlines

Monitoring Indicator:	L10: Housing development by type
Relevant Policies:	DM6

3.7.1. There were 12 applications in the 2018-2019 financial year proposing the creation of HMOs, and of those applications, all requiring full planning permission were refused.

3.7.2. The remaining applications were for a Certificate of Lawful Use under Sections 191 and 192 of Town and Country Act 1990 (as amended). Of these, three were granted and two were refused.

3.7.3. There were also one grant of planning permission for the conversion of HMOs to flats.

Table 19: Determination of applications proposing Houses in Multiple Occupation in 2018-19

	Application Withdrawn	Approved with informatives	Refused with informatives	Total
Cert of Lawfulness Existing Use	0	3	1	4
Cert of Lawfulness Proposed Use	0	0	1	1
Full Planning Approval	1	0	6	6
2018-2019 Total	1	3	8	11

3.8. Gross Self-Contained Delivery— Access to and use of buildings

Table 20: Monitoring Headlines

Monitoring Indicator:	L11 (i) Life time homes/M4(2) standards
Target:	All new build to be built to lifetime home /M4(2) standards
Target met:	No
Relevant Policies:	CS2(D), DM7, DM16

Table 21: Gross Self-Contained Delivery - Housing meeting M4(2) accessibility standards - 2012-2019¹³

Financial Year	Lifetime Homes/M4(2) (new build)	Total units (new build)	Percentage Lifetime Home/M4(2)
2012-2013	238	281	85%
2013-2014	604	627	96%
2014-2015	609	618	99%
2015-2016	468	490	96%
2016-2017	408	409	100%
2017-2018	1387	1432	97%
2018-2019	255	328	78%
Total	3714	3857	95%

¹³ Those units which are demolished on a site to make way for these new units are not counted. The way in which totals are calculated for Lifetime Homes means that they do not match the totals given elsewhere. This statistic is associated with the whole development completion date, rather than the particular units in question, and so for large phased schemes the whole scheme will be reported as complete when the last aspect is completed, rather than as the particular units complete.

All data has been extracted from the London Development Database.

- 3.8.1. Waltham Forest has consistently built almost all new build properties to Lifetime Homes standards/ M4(2).
- 3.8.2. M4(2) accessible housing standards are taken from Part M Volume 1 of the Building Regulations and replaced the lifetime homes standards in October 2015.¹⁴
- 3.8.3. 'Lifetime Homes' was a set of 16 design standards which were designed to meet the varying needs of occupiers as their lives changed and were capable of being adapted easily. From 1st October 2015, new accessible housing standards were introduced and are contained within Part M Volume 1 of the Building Regulations.¹⁵
- 3.8.4. The Mayor's Housing Standards Policy Transition Statement set out how the London Plan policies should be interpreted in the light of these changes. This states that 90% of new build dwellings should meet the standards set out in category M4(2) and the remaining 10% should comply with category M4(3) (and M4(2)).¹⁶

¹⁴ HM Government, 2016, Building Regulations 2010 Approved Document M Volume 1, 2015 edition incorporating 2016 amendment for use in England (Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/540330/BR_PDF_AD_M1_2015_with_2016_amendments_V3.pdf)

¹⁵ Lifetime Homes, 2010, Lifetime Home (LTH) Revised Criteria, (Available at: http://www.lifetimehomes.org.uk/data/files/For_Professionals/accessible_revisedlthstandard_final.pdf)

¹⁶ Greater London Authority, 2015, Housing Standards Policy Transition Statement (Available at: <https://www.london.gov.uk/file/2060>)

3.9. Gross Self-Contained Delivery— Wheelchair accessibility

Table 22: Monitoring Headlines

Monitoring Indicator:	L11 ii) % of new housing developments over 10 units with wheelchair units
Target:	10% of new developments with a capacity of 10 or more units to be wheelchair accessible or easily adaptable
Target met:	No. (Good progress made)
Relevant Policies:	CS2(D), DM7, DM16

3.9.1. Waltham Forest seen a consistent delivery of around 9% of total units in new build developments as Wheelchair Accessible (M4(3)), though this dropped to around 8% in 2018-19.

Table 23: Gross Self-Contained Delivery - Wheelchair Accessibility - 2012-2019¹⁷

Financial Year	Wheelchair Accessible Homes (in a new build development of 10 or more units)	Total units (in a new build development of 10 or more units)	Percentage Wheelchair Accessible
2012-2013	18	220	8.2%
2013-2014	51	557	9.2%
2014-2015	50	564	8.9%
2015-2016	34	365	9.3%

¹⁷ The way in which totals are calculated for Wheelchair Accessible Homes means that they do not match the totals given elsewhere. This statistic is associated with the whole development completion date, rather than the particular units in question, and so for large phased schemes the whole scheme will be reported as complete when the last aspect is completed, rather than as the particular units complete.

Financial Year	Wheelchair Accessible Homes (in a new build development of 10 or more units)	Total units (in a new build development of 10 or more units)	Percentage Wheelchair Accessible
2016-2017	30	335	9.0%
2017-2018	130	1328	9.8%
2018-2019	19	243	7.8%
Total	332	3612	9.2%

3.9.2. From 1st October 2015, new accessible housing standards were introduced and are contained within Part M Volume 1 of the Building Regulations.¹⁸

3.9.3. M4(3) Wheelchair user dwellings (wheelchair accessible or wheelchair adaptable) replaced the Wheelchair Accessible Homes standards referred to in Policy 3.8 of the London Plan.¹⁹

¹⁸ HM Government, 2016, Building Regulations 2010 Approved Document M Volume 1, 2015 edition incorporating 2016 amendment for use in England (Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/540330/BR_PDF_AD_M1_2015_with_2016_amendments_V3.pdf)

¹⁹ Greater London Authority, 2015, Housing Standards Policy Transition Statement (Available at: <https://www.london.gov.uk/file/2060>)

3.10. Non-Self-Contained Delivery

Table 24: Monitoring Headlines

Monitoring Indicator:	H2(a) New dwellings built in previous 5 years; H2(b) (NI154) – New dwellings built (annually) - Including net gain of housing including empty properties returned to use and non self contained units.
Relevant Policies:	CS2(C), DM2

Table 25: Non-Self-Contained delivery (adjusted,²⁰ net) 2012-2019)

Financial Year	Total (Net)
2012-2013	-27
2013-2014	11
2014-2015	-30
2015-2016	-64
2016-2017	-17
2017-2018	299.1
2018-2019	0
Total	172.1

3.10.1. Over the plan period Waltham Forest has seen a net gain in non-self-contained accommodation.

3.10.2. Non-self-contained accommodation is defined by different units or households sharing certain communal facilities, such as kitchens and bathrooms.

²⁰ MHCLG, 2019, Planning Practice Guidance, Paragraph: 034 Reference ID: 68-034-20190722 and Paragraph: 035 Reference ID: 68-035-20190722 (Available at: <https://www.gov.uk/guidance/housing-supply-and-delivery>)

3.10.3. Examples of non-self-contained accommodation are bedrooms in student halls of residence, shared living schemes, hostels, large houses in multiple occupation and care homes.

Table 26: Components of Non-Self-Contained Delivery 2012-2019

Financial Year	Net change in Hostel bedrooms	Net change in C1 Halls of Residence bedrooms	Net change in C1 Halls of Residence (studios)	Net change in C2 bedrooms
2012-2013	-11	0	0	-16
2013-2014	11	0	0	0
2014-2015	17	0	0	-47
2015-2016	19	0	0	-83
2016-2017	-10	0	0	-7
2017-2018	75	485	42	-20
2018-2019	0	0	0	0
Total	101	485	42	-173

3.10.4. There has been an overall loss of bedrooms of non-self-contained accommodation in C2 use class, which includes residential care homes, hospitals, nursing homes, boarding schools, residential colleges, and secure residential institutions (C2a).

3.10.5. The predominant type of C2 accommodation which has been lost over the plan period in Waltham Forest is residential care homes.

3.10.6. 2017-18 saw the delivery of 527 beds of student accommodation at the Mandora site in Blackhorse Lane, known as 'Mannequin House'. 42 of these units were studios.

3.10.7. 81 additional hostel beds were also delivered at 497-501 Lea Bridge Road.

3.10.8. There were no changes in non-self-contained accommodation in 2018-19, however 4-10 Forest Road, which will provide 353 beds of student accommodation started on site in July 2018.

3.11. Gypsy and Traveller Provision

Table 27: Monitoring Headlines

Monitoring Indicator:	H4 – Pitches for Gypsies and Travellers
Target:	Provide a minimum of (an additional) 3 pitches for Gypsy and Travellers up to 2017.
Target met:	Yes
Relevant Policies:	CS2(F), DM2, DM8

3.11.1. Waltham Forest currently has provision for 20 pitches. 17 of these are on a Local Authority site at Folly Lane, Chingford, while 3 are located on a private site in Woodford Green, adjacent the North Circular.

Table 28: Traveller and Travelling Showpeople Caravan Sites provided by Local Authorities

Local Authority	Site and Address	Date Site Opened	Date of Last Site Changes	Total Number of Pitches	Residential	Transit	Caravan Capacity
Waltham Forest	Peacocks Close, 7 Folly Lane Chingford E4 8TX	1985	2007	17	17	0	17

Table 29: Count of Traveller Caravans on LA sites²¹

Year	Month	Socially Rented Caravans	All Private Caravans	Total All Caravans
2015	January	15	0	15
	July	0	0	0
2016	January	12	0	12

²¹ MHCLG, 2019, Traveller caravan count: January 2019 (Available at: www.gov.uk/government/statistics/traveller-caravan-count-january-2019)

Year	Month	Socially Rented Caravans	All Private Caravans	Total All Caravans
	July	12	0	12
2017	January	12	0	12
	July	12	0	12
2018	January	17	0	17
	July	12	0	12
2019	January	15	0	15

3.11.2. The London Gypsy and Traveller Accommodation Needs Assessment (GTANA) (2008) identified that there was a need for a minimum of 3 additional pitches up to 2017.

3.11.3. Waltham Forest has one Local Authority caravan site at Folly Lane, Chingford. The MHCLG Caravan Count indicates that at the two most recent visits the site was below capacity.

3.11.4. There is also one private site, located at Hale Brinks North, Woodford Green. This site is for three static caravans, and has lawful use as a gypsy and traveller site following a planning appeal decision in 2012²².

²² Appeal reference: APP/U5930/C/OO/1055308

4. Location and Management of Growth

4.1. Preparation of Area Action Plans

Table 30: Monitoring Headlines

Monitoring Indicator:	LP3: Number of site specific proposals planned for or implemented at identified opportunity sites
Target:	Adoption and Implementation of 4 Area Action Plans
Target met:	No
Relevant Policies:	CS1, DM1, WTC1, BHL1

Table 31: Adopted Area Action Plans²³

Adopted Development Plan Documents	Status
Blackhorse Lane Area Action Plan	Adopted on 5 March 2015
Walthamstow Town Centre Area Action Plan	Adopted on 16 October 2014

4.1.1. Three development plan documents have been adopted since 2012; Development Management Policies DPD (2013), the Walthamstow Town Centre Area Action Plan (2014), and the Blackhorse Lane Area Action Plan (2015).

4.1.2. Sites were allocated in Blackhorse Lane and Walthamstow Town Centre through Area Action Plans (AAPs), adopted in 2015 and 2014 respectively.

4.1.3. The Northern Olympic Fringe AAP, Wood Street AAP, and Site Specific Allocations Development Plan Document (DPD) progressed to Preferred Options stage, but have not been adopted.

²³ Please refer to the Council's website for further information. (Available at: <https://walthamforest.gov.uk/content/area-action-plans>)

Table 32: Unadopted Area Action Plans

Unadopted Development Plan Documents	Status
Wood Street Area Action Plan	Preferred Options published on 29 July 2013
Northern Olympic Fringe Area Action Plan	Preferred Options published on 17 January 2011
Site Specific Allocations DPD	Preferred Options published on 29 July 2013

4.2. Location of Housing Growth

Table 33: Monitoring Headlines

Monitoring Indicator:	<p>LP3: Number of site specific proposals planned for or implemented at identified opportunity sites;</p> <p>LP4: Number of planning approvals for major developments within and outside the key growth areas</p>
Relevant Policies:	CS1, CS2, DM1, WTC1, BHL1

4.2.1. The Waltham Forest Core Strategy set out the Key Growth Areas of Blackhorse Lane, the Northern Olympic Fringe, Walthamstow Town Centre and Wood Street.

4.2.2. Potential housing supply by each identified area, as stated in Policy CS1 of the Core Strategy is shown in Table 34.

Table 34: Potential Supply in each Key Growth Area²⁴

Key Growth Areas	Potential Supply
Blackhorse Lane	up to 2,500 new homes
Northern Olympic Fringe Area	up to 2,500 new homes
Walthamstow Town Centre	up to 2,000 new homes
Wood Street	up to 1,000 new homes
Large sites outside Key Growth Areas	up to 5,500 new homes
Total	up to 13,500 new homes

4.2.3. The achieved spatial distribution of housing development (net self-contained) from 1 April 2012 to 31 March 2019 by Key Growth Area is set out in Table 35.

²⁴ Waltham Forest Core Strategy, 2012, p.44. Table 4 - Estimated housing capacity of Key Growth Areas and sites outside of Key Growth Areas.

Table 35: Spatial distribution of housing development (net self-contained) 2012-2019

Sites/ Areas	Total delivery from allocated sites	Windfall delivery	Total delivery	Windfall by % of total
Blackhorse Lane	898	139	1037	13.4%
Northern Olympic Fringe	0	394	394	100%
Walthamstow Town Centre	247	229	474	47.9%
Wood Street	0	337	337	100%
Windfall (i.e. rest of the Borough)	n/a	2634	2634	100%
Total	1145	3731	4876	76.5%

4.2.4. Blackhorse Lane has made the largest single contribution to the total supply over the plan period of any Growth Area. With over 90% of this being delivered on allocated sites, the policy of directing growth into this area has been broadly successful.

As identified in Table 32, above, the Northern Olympic Fringe AAP, Wood Street AAP, Site Specific Allocations DPD were not adopted, and so in these areas, 100% of the delivery is counted as being on unallocated sites, and is thus counted as windfall. Walthamstow Town Centre saw just over 50% of housing delivery happening on allocated sites.

4.2.5. Borough-wide, the total contribution of windfall was around 75% for the plan period.

4.2.6. The detailed tables (Table 37 and 38) show how the approved units for major development between 1 April 2012 and 31 March 2019 have been distributed.

4.2.7. This is summarised in the below table (Table 36). A high proportion of approved units classed as major development in the growth areas have been on sites which have been allocated.

Table 36: Percentage of approved units for major development on allocated sites (2012-2019)

Sites/Areas	Percentage of approved units for major development on allocated sites
Blackhorse Lane	94.9%
Walthamstow Town Centre	77.5%

Table 37: Number and status of units (net) granted planning permission for major development (10 units or greater) in adopted AAP areas from 1 April 2012 - 31 March 2019

Blackhorse Lane Area Action Plan				Walthamstow Area Action Plan		
Financial Year	BHL Allocations	Other sites	BHL Total	WTC Allocations	Other sites	WTC Total
2012-13	459	0	459	121	0	121
2013-14	162	18	180	0	0	0
2014-15	370	-2	368	0	0	0
2015-16	0	0	0	0	10	10
2016-17	49	30	79	331	48	379
2017-18	815	0	815	518	0	518
2018-19	829	0	829	502	0	502
Grand Total	2684	46	2730	1472	58	1530

Table 38: Number and status of units (net) granted planning permission for major development (10 units or greater) outside of adopted AAP areas from 1 April 2012 - 31 March 2019

Financial Year	Northern Olympic Fringe Area Action Plan			Wood Street Area Action Plan			Rest of Borough		
	Draft Proposed sites ²⁴	Other sites	NOF Total	Draft Proposed sites ²⁵	Other sites	WS Total	Draft Proposed Sites ²⁴	Other sites	RoB Total
2012-13	125	0	125	0	0	0	294	0	294
2013-14	21	0	21	125	12	137	258	138	396
2014-15	19	0	19	21	0	21	132	0	132
2015-16	32	0	32	11	0	11	54	157	211
2016-17	300	134	434	389	0	389	61	155	216
2017-18	730	0	730	0	0	0	30	72	102
2018-19	0	0	0	26	0	26	119	64	183
Grand Total	1227	134	1361	572	12	584	948	586	1534

²⁵ These 'Draft proposed sites' are those which were advanced to Preferred Options stage, but not adopted through the consultation process in relation to the Northern Olympic Fringe AAP, Wood Street AAP, and the Site Specific Allocations DPD.

4.3. Development on Brownfield Land

Table 39: Monitoring Indicators

Monitoring Indicator:	LP5: Number of developments on green field sites (Green Belt or MOL) and those on previously developed land.
Target:	No loss of Green Belt or Metropolitan Open Land (MOL)
Target met:	Yes
Relevant Policies:	CS1, DM1

Table 40: Area of Waltham Forest designated as Green Belt (hectares)²⁶

Local planning authority	Area as at 31 March 2016	Area as at 31 March 2017	Area as at 31 March 2018	Area as at 31 March 2019	Net change
Waltham Forest	840	840	840	840	0

4.3.1. There has been no loss of Green Belt or Metropolitan Open Land.

4.3.2. The last permission granted on Green Belt or MOL was for the conversion of the existing Pumping Station at Chingford Mill to form 8 self-contained flats, with the conversion of Turbine House into 2-bed single-family dwelling. That permission was granted in 2009, and not implemented.

²⁶ Data is from Local Authority Green Belt Statistics, Annex Table 2, and London Development Database (2019). The full statistical release is available from <https://www.gov.uk/government/collections/green-belt-statistics> . The next update will be October 2020.

5. Five Year Housing Land Supply

Five Year Land Supply Position

5.1. Paragraph 73 of the revised NPPF (2019) sets out the requirement that;

*'Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old.'*²⁷

5.2. Waltham Forest is able to demonstrate a supply of deliverable sites amounting to 5.7 years.²⁸

Deliverable Supply

5.3. In total, the identified deliverable supply for the period 1 April 2019 – 31 March 2024 is 5975 homes, which is comprised of four sources, outlined in Table 41 below.

Table 41: Deliverable Supply Summary

Deliverable Supply 2019-2024 (net units)	
Large sites – with planning permission	3957
Non-self-contained accommodation with planning permission	163.5
Windfall allowance from small sites	1180
Sites on the Brownfield Land Register	674
LBWF Deliverable Total	5974.5

5.4. The revised NPPF (2019) sets out clearly in Annex 2 the criteria for inclusion in a Five Year Housing Land Supply. In order to be considered deliverable;

²⁷ MHCLG, 2019, National Planning Policy Framework, p.20-21. (Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf)

²⁸ Rounded to 1 decimal place.

To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years.

In particular:

a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.²⁹

5.5. The majority of Waltham Forest's deliverable supply is made up by large sites (of ten units of greater), which benefit from a grant of full planning permission. This does not include sites which have been granted outline permission. In line with the definition of deliverability set out in the revised NPPF (2019), unless there are long term phasing plans for these sites, they have been considered deliverable so long as the permission has not expired.

5.6. A further component of supply is permitted non-self-contained accommodation, which is adjusted using the ratios outlined in section 3.10 (above).

5.7. Sites included on Waltham Forest's Brownfield Land Register, where there is clear evidence that housing completions will begin on site within five years, are included as a component of supply.

5.8. A conservative estimate of windfall has also been included as a component of deliverable supply. Paragraph 70 of the revised NPPF (2019) states that;

'Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the

²⁹ MHCLG, 2019, National Planning Policy Framework, p.66. (Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf)

*strategic housing land availability assessment, historic windfall delivery rates and expected future trends.*³⁰

Having regard to the above definition, an allowance for windfall small sites is included, based upon the average contribution made from these sites over the past five years. The rolling five-year average figure is 236 (per annum), giving a total over the 5 years of 1180 units. Considering the prospect of future trends, there is clear evidence that the pipeline of small sites with a grant of full planning permission is healthy, with over 800 units in the pipeline, amounting to 3.4 years of small site supply (assuming continued delivery of 236 per annum).

Five Year Supply Requirement

5.9. Paragraph 73 of the revised NPPF (2019) sets out that the total housing requirement should be based on the *'housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old,'* and should *'in addition include a buffer (moved forward from later in the plan period) of:*

- a) 5% to ensure choice and competition in the market for land; or*
- b) 10% where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan, to account for any fluctuations in the market during that year; or*
- c) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply.*³¹

5.10. The London Plan (2015) set the housing requirement for Waltham Forest in policy 3.3, and should be considered an adopted strategic policy with reference to paragraph 73 of the revised NPPF, above. The appropriate housing

³⁰ MHCLG, 2019, National Planning Policy Framework, p.19. (Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf)

³¹ MHCLG, 2019, National Planning Policy Framework, p.20-21. (Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf)

requirement to use is therefore that set out in Table 3.1 of the London Plan, of 862 units per annum.³²

5.11. In addition, any shortfall accumulated since the base date of the adopted plan should be added to the housing requirement. The approach to take is elaborated in the recently updated PPG on Housing Supply and Delivery, paragraph 31;

‘The level of deficit or shortfall will need to be calculated from the base date of the adopted plan and should be added to the plan requirements for the next 5 year period (the Sedgefield approach). If a strategic policy-making authority wishes to deal with past under delivery over a longer period, then a case may be made as part of the plan-making and examination process rather than on a case by case basis on appeal.’³³

5.12. The Council considers that the most appropriate buffer to apply, in line with paragraph 73, is 5%, as there has been no significant under delivery, measured against the Housing Delivery Test, defined in footnote 39 ‘where this indicates that delivery was below 85% of the housing requirement’.³⁴ The Council is not seeking at this time to confirm a Five Year Housing Land Supply through an annual position statement.

5.13. The accumulated shortfall has been calculated from the base date of the adoption of the Local Plan, and totals 679.9 units. This calculation is set out in Table 42 below.

Table 42: Shortfall calculation

Total net delivery 1 April 2012 - 31 March 2019	Cumulative housing requirement from 1 April 2012 – 31 March 2018	Shortfall
5048.1	5728	679.9

³² GLA, 2015, Further Alterations to the London Plan, p.110 (Available at: <https://www.webarchive.org.uk/wayback/archive/20151111145741/http://www.london.gov.uk/sites/default/files/London%20Plan%20March%202015%20%28FALP%29%20-%20Ch3%20London%27s%20People.pdf>)

³³ MHCLG, 2018, Planning Practice Guidance, Housing and economic land availability assessment (Available at: <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment#housing-delivery-5-year-land-supply>)

³⁴ MHCLG, 2019, National Planning Policy Framework, p.21. (Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf)

5.14. This accumulated shortfall will be addressed within the next five years (the Sedgefield approach), in line with guidance.

5.15. Table 43 (below) illustrates the calculation undertaken to give the total requirement figure of 5205.4.

Table 43: Worked requirement calculation

Step	Calculation	Result
Adopted target (per annum)	-	862
5 Year Target	862×5	4310
5 Year Target with buffer applied (5%)	4310×1.05	4525.5
5 Year Target buffer + shortfall	$4525.5 + 679.9$	5205.4
Total Requirement	5205.4	

Five Year Land Supply Calculation

Table 44: Years of deliverable housing supply at 1 April 2018³⁵

	London Borough of Waltham Forest	Calculation
Years of deliverable housing supply	5.7	= 5974.5/(5205.4/5)

5.16. Waltham Forest is able to demonstrate a supply of specific deliverable sites sufficient to provide at least 5.74 years' worth of housing against its housing requirement, taking account of shortfall, and after applying the appropriate buffer.

³⁵ Rounded to one decimal place.

6. Local Development Scheme Update

- 6.1. The most recent Local Development Scheme (LDS) was adopted by the Council on 6th December 2019, covering the 3 year period to 2023.
- 6.2. The LDS is published on the Council's website.³⁶ Subsequent to the last LDS which proposed a single development plan document (DPD), the current LDS proposed the preparation of two DPDs. These will update and carry over (where justified) all existing policies currently included in the adopted plan/emerging plan documents including the Core Strategy, Development Management Policies and the Area Action Plans. These documents will be supported by use of Supplementary Planning Documents (SPDs). Other non-statutory types of document including Masterplans, Planning Briefs, and Design Concept statements will also be used wherever possible.
- 6.3. The main plan documents to be produced are:
- Waltham Forest Local Plan - Strategic Policies
 - Waltham Forest Local Plan - Site Allocations
 - North London Waste Plan - in partnership with the North London boroughs of Barnet, Camden, Enfield, Hackney, Haringey and Islington
- 6.4. The LDS timetable is as below.

³⁶ For more information please visit:

<https://democracy.walthamforest.gov.uk/documents/s70561/Waltham%20Forest%20Local%20Development%20Scheme%202020-2023.pdf>

Table 45: Local Development Scheme Timetable³⁷

Document	Initial consultation (Regulation 18)	Draft Plan (Preferred Options)	Proposed Submission (Regulation 19)	Submission (Regulation 22)	Examination (Regulations 23-25)	Adoption (Regulation 26)
Waltham Forest Local Plan – Strategic Policies	Completed (November-December 2017 – Direction of Travel Issues and Options Document)	Completed July-September 2019 – Draft Local Plan published for consultation)	Summer 2020	Autumn 2020	Winter 2020-21	Summer 2021
Waltham Forest Local Plan – Site Allocations Document	Spring 2020		Winter 2020-21	Spring-Summer 2021	Autumn 2021	Summer 2022
North London Waste Plan	Completed July-September 2015		Completed January-February 2019	Completed June 2019	Autumn-Winter 2019	Summer 2020

6.5. Consultation work on the emerging plan indicated the need to provide greater details on site specific proposals. The Council's challenging growth target from the London Plan (an increase of 108%) from previous requirements means that land must be used intensively and growth well managed to fit within the existing built up areas also managing the impact on local character. In this context, the Council considers that a supporting Site Allocation Document would have an

³⁷ London Borough of Waltham Forest, 2019, Waltham Forest Local Development Scheme

<https://democracy.walthamforest.gov.uk/documents/s70561/Waltham%20Forest%20Local%20Development%20Scheme%202020-2023.pdf>

important role in managing development expectations on identified strategic sites to meet the current and future needs. Accordingly, the revised LDS proposes the preparation of the new Local Plan in two parts: Local Plan - Strategic Policies and Local Plan - Site Allocations.

- 6.6. The Council has been working collaboratively with other North London Boroughs on the preparation of the North London Waste Plan. This project is now at the examination stage and is expected to be adopted during 2020.
- 6.7. Further monitoring and updates to the LDS programme will be published in subsequent AMR documents.

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