

# SHAPING THE BOROUGH

## WALTHAM FOREST LOCAL PLAN (LP1) 2020 - 2035 SUBMISSION

REGULATION 22(1)(C)  
CONSULTATION STATEMENT



APRIL 2021

Regulation 22(1)(c) Consultation Statement of  
**Waltham Forest Council**  
in support of  
**Shaping the Borough: Waltham Forest Local Plan (LP1) 2020-2035**



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## 1.0 Introduction

### 1.1 Purpose

Waltham Forest's new Local Plan will, when adopted, shape development of the Borough over the next 15 years. It will provide the policies that inform what could be built where, to ensure that the social, economic and housing needs of the borough are met.

When adopted, the new Local Plan 2020 to 2035 will replace the Core Strategy, which was adopted in 2012 and will soon be out of date, as well as a number of other planning documents: Development Management Policies Document (2013); Walthamstow Town Centre Area Action Plan (2015); Blackhorse Lane Area Action Plan (2015). This will result in a far more streamlined system.

Together with the London Plan and the North London Waste Plan (once they are adopted), the Local Plan will form Waltham Forest's Statutory Development Plan under section 38 of the 2004 Planning and Compulsory Purchase Act.

This Consultation Statement sets out how the Council has involved residents and key stakeholders in preparing the Waltham Forest Local Plan (LP1) 2020 to 2035 Proposed Submission Document in accordance with Regulations 18 and 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

**Important note:** This Consultation Statement refers specifically to Part 1 of the Local Plan (referred to as LP1). Part 2 of the Local Plan (referred to as LP2), the Draft Site Allocations Supplementary Planning Document (SPD), was initiated in 2019 in response to the Local Plan Reg 18 consultation comments and published in autumn 2020. It is therefore at an earlier stage in its preparation process, undergoing Reg 18 consultation during autumn 2020.

This statement meets Regulation 22 (1)(c) and demonstrates that consultation on the preparation of LP1 has been undertaken in accordance with the relevant Regulations and Waltham Forest's adopted [Statement of Community Involvement \(SCI\) 2018](#).

The separate SCI document sets out how the Council will consult and involve the public and statutory consultees in all planning matters. In 2020, an addendum was included in response to Covid 19 restrictions. The full document, with addendum, can be viewed on the Local Plan website [walthamforest.gov.uk/LocalPlan](http://walthamforest.gov.uk/LocalPlan)

In addition, the Council has prepared the following documents, with online links provided:

[Draft Local Plan Consultation Report June 2020](#)

## 1.2 Background

This Consultation Statement describes how the Council has undertaken community participation and stakeholder involvement in the production of the Local Plan Part 1 (LP1) Strategic Policies. It sets out how representations and feedback gathered throughout the plan making process have shaped successive iterations of the Plan, going back to the start of the process in 2017.

### 1.2.1 About the Local Plan Part 1

The Local Plan sets out the Council's planning policy framework for the Borough. It will be used to promote, shape and manage growth in Waltham Forest for the next 15 years. Policies in the Plan set out how the Council will seek to achieve an appropriate balance between physical, social, economic and environmental protection in the Borough for the benefit of all residents and stakeholders.

Once adopted, the new Local Plan will replace the Core Strategy (2012), Development Management Policies Document (2013), Walthamstow Town Centre Area Action Plan (2014) and Blackhorse Lane Area Action Plan (2015).

The Local Plan should be read alongside the [Policies Map](#).

In accordance with the National Planning Policy Framework (NPPF) and [London Plan 2021](#) policy principles, the Local Plan directs growth to the most appropriate locations – considering the varied roles and character of different areas, the need to actively manage patterns of growth and make the fullest possible use of public transport, walking and cycling. Accordingly, the proposed growth strategy seeks to focus significant development in sustainable locations.

In planning for growth for over a 15-year period, and in accordance with National and London targets, the Waltham Forest Local Plan seeks to accommodate net increases of 27,000 homes and 52,000 sqm of employment floorspace, with supporting physical, social and green infrastructure provision.

The Council's Local Plan is being produced in two parts: Part 1 Strategic Policies, submitted here under Regulation 22; and Part 2, the Site Allocations Development Plan Document (DPD), which underwent Regulation 18 consultation in autumn 2020.

Prior to Reg 19 public consultation, the Waltham Forest Local Plan (LP1) 2020 to 2035 Proposed Submission Document was subject to a Sustainability Appraisal, Habitats Regulations Assessment, and Equalities Impact Assessment. Further details and conclusions of these are outlined in Section 3.

### 1.1.2 Evidence Base

The new Local Plan will be supported by a series of Supplementary Planning Documents, Neighbourhood Plans (as may be prepared) and other guidance, including masterplans and planning briefs. The complete set of documents are available for public view on [the Local Plan website](#).

### 1.1.3 Consultation period

The Waltham Forest Local Plan (LP1) 2020 to 2035 - Proposed Submission Document, was published in accordance with Reg 19 for an open consultation period running from Monday 26 October 2020 to Monday 14 December 2020. Engagement was undertaken in accordance with the Waltham Forest Statement of Community Involvement (SCI) 2018, and in line with temporary national policies in place at the time as part of the Covid-19 health crisis. Full details are included in Appendix 2.

In total, 754 official representations were received on LP1 from 210 consultees. These included a variety of residents and stakeholders. Full details of responses are included in the consultation report, Section 3.

Previous Reg 18 consultations and iterations of the document are detailed in Section 2 and Appendix 1 and 2.

Separate consultation on the Site Allocations Document (LP2) also took place in September 2020 at Reg 18 stage at the same time as LP1. A full report on that consultation will be issued separately.

#### 1.1.4 Future Reviews of the Local Plan

In order to keep the Plan up to date throughout its 15 year lifetime, Waltham Forest intends to review the plan approximately every five years, or sooner if there is any significant change to national policy or relevant new evidence on which the Plan is founded, such as local economic or demographic projections.

### 1.3 Structure of Statement

This statement comprises the following:

Section 1: Introduction

Section 2: Timeline of the preparation and previous iterations of the Local Plan Part 1

Section 3: Summary of the main issues raised during the Regulation 18 and 19 consultations

Appendix 1: Details of Duty to Cooperate and Reg 18 consultations. This covers who was invited to comment, how the consultations were undertaken, summaries of the main issues raised, a link to the full consultation responses document and how the comments received have been addressed by the Council. *Regulation 22 (1)(c)(i) (ii) (iii) and (iv)*

Appendix 2: Details of Duty to Cooperate and Reg 19 consultation. This covers who was invited to comment, how the consultations were undertaken, a summary of the issues raised, a link to the full consultation doc, and how the comments received have been considered by the Council. *Regulation 22 (1)(c)(v)*

Appendix 3: Subsidiary information and documents:

- A pdf of the responses form and guidance
- Public notice of Reg 18 consultation
- Public notice of Reg 19 consultation
- Notification email for Reg 19 consultation
- Links to printed information leaflets for Reg 18 and Reg 19 consultations
- PDFs of Reg 19 online presentations
- Paper responses for Reg 19 consultation



## 2.0 Plan Production Timeline

The process of producing the new Waltham Forest Local Plan began in 2017 with the preparation of the Direction of Travel document, published for consultation from 8 November to 22 December 2017. In 2019, in response to Reg 18 public consultation, the decision was taken to add a Site Allocations Development Plan Document to the Local Plan. Consequently, the Local Plan now consists of two parts:

Local Plan Part 1: Strategic Policies – submitted here for examination

Local Plan Part 2: Site Allocations – currently intended to be submitted for examination in Spring 2022, following separate Reg 19 consultation

### 2.1 Key stages to date

#### **March 2017: Local Development Scheme approved**

The Local Development Scheme (LDS), a public statement setting out the Council's project plan for preparing Development Plan Documents, was approved by Cabinet and Full Council in March 2017. Preparation and maintenance of an LDS is a requirement under Section 15 of the Planning and Compulsory Purchase Act 2004.

The LDS set out the subject matter and geographical area of the documents the Council intended to prepare. It has played an important role in informing the public, stakeholders and local communities about the plan preparation programme and when to get involved. It also established the Council's priorities regarding plan making, enabling the work programme to be set.

The 2017 LDS sought to deliver a single consolidated Local Plan. This Plan was intended to deliver a focused and concise document, keeping policies at a more strategic level, to be supported by Supplementary Planning Documents (SPDs) and other non-statutory documents, including masterplans for specific sites.

Following subsequent review of the 2017 LDS, a new LDS document was adopted in December 2018 covering the period 2020-2023. Rather than preparing a single consolidated Local Plan document, the new Local Plan now consists of two separate Development Plan Documents:

- Waltham Forest Local Plan (Strategic and Non-Strategic Policies) - LP1
- Waltham Forest Local Plan (Site Allocations) – LP2

### **November 2017: New Local Plan announced**

[Direction of Travel](#) document published explaining what the Local Plan is and setting out the strategic direction for development - the needs, challenges and opportunities facing the Borough over the next 15 years. It set out proposed policy directions for comment, and explained how the plan making process would proceed and how to get involved.

Download the [Direction of Travel Document](#)

This early Reg 18 consultation ran **from Monday 6 November to Friday 22 December 2017** and included an initial call for sites that could accommodate growth (p69 of Direction of Travel document). Consultation and communications included: an advert and a legal notice in local media; letters sent to residents; leaflets distributed at a roadshow; availability of the document online and in local libraries. Further details are set out in [Appendix 1.1](#). The [Direction of Travel Consultation Report](#) was made publicly available on the Local Plan website.

Download the [Direction of Travel Consultation Report](#)

### **2018-Summer 2019: Engagement and production of Draft Local Plan**

During this period, work on the production of the Draft Local Plan took place, shaped by responses to the Direction of Travel document, as well as ongoing changes to national and London policy, changing economic and demographic predictions. Meetings were held with neighbouring boroughs and statutory consultees under the Duty to Cooperate.

### **Summer 2019 (22 July-30 September 2019): Statutory engagement on Draft Local Plan**

On 11 July 2019 Waltham Forest Council Cabinet approved the Draft Local Plan for publication and consultation and delegated authority to make final changes to the draft plan ahead of consultation, to the Director of Planning in consultation with the Portfolio Lead for Economic Growth and Housing Development. [Minutes of the meeting](#) are available on the Council's website.

Draft Local Plan published 22 July 2019 online, with print versions available in local libraries and at the Town Hall. Associated evidence base documents, Equalities Impact Assessment (EqIA) and Sustainability Appraisal (SA) also published online.

Evidence base documents cover housing, retail, local economy, climate change, culture, transport, social infrastructure, green and blue infrastructure, and tall buildings were also made available to support the Draft Local Plan.

Open engagement events took place in community spaces and at public events across the borough and Duty to Cooperate meetings continued. Full details can be found in **Appendix 1.2**.

All residents, businesses and stakeholders were invited to submit responses to the formal consultation by the following means: online, email, post. In total, 401 submissions were made to the 2019 Reg 18 consultation (342 from individuals and 59 from organisations) involving 2,655 comments. These can be found in the [Consultation Report](#).

Another call for sites ran from Wednesday 31 July to Tuesday 31 December 2019.

### **September 2019-September 2020: Plan amendments**

The Council made changes to the Draft Local Plan to address comments received during consultation.

In particular, one major change was undertaken at this stage: in response to requests from residents made during the public consultation, a supplementary part was added to the Local Plan document – the draft Site Allocations, identifying key sites on which the proposed growth could be accommodated.

On 5 December 2019, Cabinet agreed to amend the 2017 Local Development Scheme to include a strategic site allocations development plan document, subsequently referred to as Local Plan Part 2 (LP2). In January and February 2020, three workshops were held with invited members of local community groups to aid with preparation of the Local Plan Part 2 (Site Allocations) document.

The Sustainability Appraisal, EqIA and evidence base documents were updated, a consultation report and topic papers were produced, and statements of common ground with other planning authorities were agreed to support publication of the next iteration of the Plan.

### **June 2020: Consultation Report published**

This 700-page [Consultation Report](#) document collated the 2,000+ responses received during the Reg 18 consultation on the Draft Local Plan and issues offer responses to each. This was published online for public view.

## **Autumn 2020**

Local Plan Part 1: Strategic Policies Proposed Submission Version was passed by Cabinet on 8 October 2020 and published 26 October. It underwent a seven-week statutory Reg 19 consultation from 26 October to 14 December 2020, including on test of soundness. [Cabinet meeting minutes](#) are publicly available online.

Following agreement with the Portfolio Lead Member, the Draft Local Plan Part 2: Site Allocations was published 24 September 2020 and underwent 11-week Reg 18 Consultation to 14 December 2020.

Both documents (LP1 and LP2) were published online: [www.walthamforest.gov.uk/LocalPlan](http://www.walthamforest.gov.uk/LocalPlan) and print copies made available for inspection at all Waltham Forest Branch Libraries and on request from the Council's Offices, Magistrates Court, (as local libraries were shut for part of the consultation period due to the Covid-19 lockdown).

Evidence base documents were published online and key documents, such as the Infrastructure Delivery Plan, presented in public online engagement meetings.

As the statutory consultation period fell within a time of national health crisis due to Covid-19, the [Statement of Community Involvement](#) was updated with an addendum. All consultation was Covid-19 compliant and in line with plan making guidance issued by MHCLG on 13 May 2020.

## **April 2021 Submission to Secretary of State**

The Council's Local Plan (LP1) will be submitted for examination with a Schedule of Proposed Changes to the published plan. At this stage consultation has not been undertaken on these changes. The Council understands that the Inspector will not treat such changes as part of the Plan to be examined but these could be taken forward as Main Modifications to the Plan (to be consulted on separately) subject to the Inspector's recommendations.

## **NEXT STEPS**

### **Summer 2021: Examination in Public**

Respondents and other residents and stakeholders will be invited to take part in the independent examination of the Local Plan Part 1.

At the same time, responses to the Local Plan Part 2 Reg 18 consultation are being considered by the Council with a view to publishing a revised version – Proposed Submission Site Allocations Local Plan (LP2) in Autumn 2021 for Reg 19 consultation.

### **End of 2021: Adoption of LP1**

The Council intends to adopt Part 1 of the new Waltham Forest Local Plan (LP1) by the end of 2021, subject to the outcome of the independent examination and receipt of the Inspector's Report.

## 3.0 Summary of Process and Main Issues

### 3.1 Summary of the consultation process for the preparation of Waltham Forest Local Plan Part 1: Strategic Policies

Public consultation under Regulation 18 took part in two stages:

Firstly, a [Direction of Travel document](#), published in November 2017. Consultation ran **from Monday 8 November to Friday 22 December 2017** and included an initial call for sites that could accommodate growth (p69 of Direction of Travel document) (see [Appendix 1.1](#) for full details).

Feedback from this early engagement helped shape the [Draft Local Plan](#), which was published in June 2019, and subject to a second stage of Reg 18 Consultation from **Monday 22 July 2019 until midnight on Monday 30 September 2019** (see [Appendix 1.2](#) for full details).

In response to comments made during this second Reg 18 consultation, a second part ([LP2: Site Allocations](#)) was added to the Draft Local Plan identifying land in the borough on which growth proposed in the Local Plan could potentially happen.

[Local Plan Part 1 Strategic Policies Proposed Submission Version](#) was then taken forward to Reg 19 consultation, published as Local Plan Part 1: Strategic Policies Proposed Submission Version for consultation from 24 October to 14 December 2020. See [Appendix 2](#) for full details.

This ran in tandem with the Reg 18 consultation for the Draft Local Plan Part 2: Site Allocations document, which took place from 24 September to 14 December 2020.

Production of the Local Plan was supported by a full [evidence base](#).

#### 3.1.1 Sustainability Appraisal Report

The Sustainability Appraisal (SA) of the Draft Local Plan was published on 30 September 2019, and prepared for the Council by ClearLead Consulting Ltd (clearleadconsulting.com). A second SA, assessing the Local Plan Part 1 (LP1 Strategic Policies) Intend to Publish document was published on 21 October 2020 for a seven-week consultation period from 26 October to 14 December 2020, prepared by ClearLead Consulting Ltd (clearleadconsulting.com) it assessed all Reg 19 LP1 policies as having either a 'significant positive' or 'uncertain' effect; none were judged to have a detrimental effect.

Read / download the report here:

- [Main Report](#)
- [Appendix A: Review of Relevant Plans, Policies and Programmes](#)
- [Appendix B: Baseline Data](#)
- [Appendix C: SA Report](#)
- [Appendix D: Direction of Travel Options Assessment](#)
- [Appendix E: Spatial Strategy Options Assessment Summaries](#)

### 3.1.2 Habitats Regulations Assessment

The Habitats and Regulations Assessment (HRA) was published on 21 October 2020 for a seven-week consultation period from 26 October to 14 December 2020, prepared by ClearLead Consulting Ltd (clearleadconsulting.com).

The assessment concluded that the boroughs projected growth in the Local Plan period arising from LP1 policies would not result in adverse effects on the integrity of Epping Forest SAC SSSI in relation to recreational pressures and urban effect when the Plan is assessed on its own. However, it was unable to draw any conclusions about the effect of air pollution on Epping Forest Special Area of Conservation (EFSAC) due to an air quality study still being in progress. Nor could it conclude that that no adverse effects on the SAC when LP1 is assessed in combination with the Epping Forest District Council Local Plan due to issues of soundness regarding the EFDC Local Plan. Accordingly officers are working with consultants on a full Air Quality Strategy to explore the in-combination effects of air pollution on the Forest arising from the Waltham Forest Local Plan and potential mitigations, which are to be included in the Mitigations SPD referenced in Policy 83.

The Local Plan was also judged to have no adverse effects on the integrity of the Lee Valley Special Protection Area (SPA) and Ramsar, either alone or in combination with growth in neighbouring areas.

Read the report here:

- [Main Report](#)
- [Appendix: Detailed Screening of Proposed Submission Local Plan Policies](#)

### 3.1.3 Equalities Impact Assessment

This report outlined the approach, evidence and findings of the EqIA for the Waltham Forest Proposed Submission Local Plan (Reg 19) (October 2020). The assessment considered equality legislation and the Council's duty under the Equality Act 2010. It was undertaken in house.

The Assessment found that the revised (Reg 19) version of the Plan had implemented positive changes to policies as a result of previous assessment (Reg18).

The Assessment concluded that the Proposed Submission Local Plan did not have any disproportionate or differential negative impacts on any one group with protected characteristics. Furthermore, the Plan could help to mitigate current barriers and advance equality of opportunity for specific groups using this assessment, in special attention to disabled, younger and older groups, women, BAME, LGBTQ+ and lower-income groups.

[Read the Equalities Impact Assessment report here](#)

### 3.1.4 Infrastructure Delivery Plan

An Infrastructure Delivery Plan was produced to support delivery of growth required by the Local Plan. This was published online in January 2021. It uses a wide variety of data sources to anticipate and plan for: what infrastructure is required over the next 15 years to accommodate the growth set out in the Local Plan; when it will be required; how much it is likely to cost; how it will be funded; who is responsible for providing it; where the funding gaps might be and how these can be overcome. The Infrastructure Delivery Plan is available in the following parts:

- [Part 1: Introduction and anticipated growth to 2035](#)
- [Part 2: Physical Infrastructure](#)
- [Part 3: Social and Community Infrastructure](#)
- [Part 4: Green and Blue Infrastructure](#)
- [Part 5: Funding, Governance and Delivery. + appendices](#)
- [Executive Summary](#)
- [Infrastructure Delivery Schedule table](#)

This is a live document that will continue to be revised as new data becomes available. An updated Infrastructure Funding Statement (IFS) will be produced annually, assessing performance to date, and revising the financial strategy for the 12 months ahead. A public-facing executive summary of the document has also been made available online.

### 3.2 Main issues raised at the different stages of the Local Plan preparation process.

#### Direction of Travel stage (Regulation 18a)

The Direction of Travel consultation acknowledged the challenges and opportunities facing the Borough. There was general support and agreement for the plan objectives. It identified that promoting sustainable transport and the need to reduce travel time should be a key consideration.

There was some opposition to new tall buildings, mainly that tall buildings must respect the local character of the Borough and the local area. It identified the need for an evidence base to understand local character.

Affordability was highlighted as a key issue in terms of provision and definition and the need to provide housing for a wide range of different tenures. It was also considered that industrial capacity should be carefully looked at in terms of whether the Borough was losing too much of its designated employment land.

Concerns were expressed about town centres over the number and proliferation of fast-food outlets. There was strong support for the protection of green spaces and Metropolitan Open Land. About the growth options, there was general support for Option 5 (the combined approach). This sought to promote key growth/hubs as the most pragmatic and realistic option for managing growth and change in Waltham Forest. Option 6 (concerning building on Green belt/MOL) was strongly opposed. See Summary of Main Issues document.

#### Draft Local Plan (Regulation 18b)

There was general support for the Plan. However, key issues identified include:

- a) the impact of growth on the character of local areas arising from growth targets, intensification, higher density and tall buildings,

- b) relationship between the Council's Local Plan and the Higham's Park Neighbourhood Plan,
- c) need for a greater focus on environmental protection, the impact of growth on the natural environment,
- d) inadequate protection and recognition given to Special Areas of Conservation (SAC) - in particular, Epping Forest SAC,
- e) lack of inclusion of site-specific details,
- f) Need for supporting social infrastructure (education/schools, health provision, transport and other infrastructure to support growth,
- g) lack of clarity on Green Belt/MOL de-designation,
- h) protection of heritage assets, also relating to Archaeological Priority Zones (APZ),
- i) Protection of heritage assets, also relating to Archaeological Priority Zones (APZ).

See Summary of Main Issues ([see appendix 1b iii](#))

### Proposed Submission Local Plan (Regulation 19)

In accordance with Regulation 20 and 22 (c) (v) of the Town and Country Planning (Local Planning) (England) Regulations 2012, a separate document setting out a summary of the main issues raised on the Proposed Submission document has been prepared. See Appendix

Issues have been raised concerning the following key areas:

- a) Distribution/impact of growth on local character - arising from proposed growth targets, approach to intensification and higher density developments, objections to high-rise buildings and their impact on the character of local areas.
- b) Potential impact of the Covid-19 pandemic on the Plan.
- c) Relationship with the London Plan employment land designations and the inclusion of B1 office uses.
- d) Infrastructure planning needs/requirements including transport, car-free developments and parking standards.
- e) The protection of Epping Forest SAC.
- f) The blanket approach taken on hot food takeaways is restrictive.

## Conformity with the Statement of Community Involvement

The Statement of Community Involvement (SCI) guides the approach to consultation stages throughout the preparation of the Local Plan. It sets out how the community should be engaged in the Local Plan process and at what stages that involvement should take place. The Council's Statement of Community Involvement (latest iteration) was adopted in December 2018. Following the outbreak of the Covid-19 Pandemic in March 2020, the Government advised that where any of the policies in the SCI could not be complied with due to the pandemic, suitable alternative arrangements should be made through online methods to ensure that plan-making and planning decisions could continue. Accordingly, an addendum to the SCI was included during summer 2020.

The SCI identified the following statutory requirements that must happen as part of any public consultation:

- Statutory and general consultation bodies (as appropriate and identified in the SCI) are notified and invited to comment on what the document ought to contain.
- Invite comments from stakeholders - residents/businesses.
- Consider any representations received.

Early discussions with statutory consultees as well as continued engagement with the local community took place throughout the plan-making process.

In addition, the SCI identifies the following requirements:

- Publish details of consultation on Council website.
- Publish details of consultation in libraries and the Council's Offices for inspection
- Consult stakeholders through a range of consultation methods.
- Consult throughout the key stages of the plan-making process.

All the above requirements have been applied and satisfied. The Town and Country Planning (Local Planning) (England) Regulations 2012 prescribe a series of consultation bodies – both Statutory and Specific/General Consultation Bodies that the Council should consult with during each consultation stage. These bodies are listed in the SCI document. These bodies have been contacted and invited to make representations on the Plan.

The Council also maintains a database of all consultees that have expressed an interest in being consulted on or being kept informed of the development of planning policy. This database is live and continuously updated. The methods of communication used to notify interested parties on the consultation database is mainly by email and post (where necessary).

The 'Duty to Cooperate' is set out in Section 110 of the Localism Act 2011, which states that it applies to all Local Planning Authorities, National Park Authorities and County Councils in England. A list of the Duty to Cooperate bodies is included in the SCI document. A separate statement has been prepared detailing how the Council has fulfilled this obligation regarding the preparation of the Local Plan.

At each stage of consultation, responses were recorded, considered and considered. With respect to the Regulation 18 consultations, resulting changes were incorporated into the Proposed Submission Version of the Local Plan (Regulation 19). Changes to the Local Plan following the Regulation 19 stage are set out in a Schedule of Proposed Changes to the Published Plan.

## **Conclusion**

Sections 2 & 3 of this document explain the process followed in preparation of the Waltham Forest Local Plan Part 1 (Strategic Policies ) 2020-2035; persons and bodies invited to make representations; and the iterative stages the document has gone through in response to feedback from residents, stakeholders, neighbouring boroughs and other duty to cooperate bodies. Full details of the Reg 18 and Reg 19 consultations are included in Appendix 1 and Appendix 2. Links have been provided to summaries and full reports on the consultation work undertaken.

This report demonstrates with evidence that the consultation process undertaken by Waltham Forest Council throughout the preparation of its Local Plan Part 1 (Strategic Policies) has been in accordance with the Town and Country Planning (Local Development) (England) Regulations 2012. The report also shows that public involvement was carried out in accordance with the Council's Statement of Community Involvement (SCI).

## Appendix 1.1: Reg 18a consultation (Direction of Travel)

Consultation on the WF Local Plan began in 2017 with the publication of the [Direction of Travel document](#).

The preparation of a new development framework for the borough requires the council to undertake an initial stage of consultation, including notifying notify stakeholders, communities and statutory bodies as outlined in the council's own [Statement of Community Involvement](#) document as adopted in 2014.

Waltham Forest invited comments on its planning strategy, set out in the Direction of Travel document, which gave details of the Council's planning priorities, potential strategies for future growth and policy directions. At this stage the Council encouraged general comments on the points raised in the document and asked respondents to state whether they broadly agreed or disagreed with the stated policy objectives and growth strategies.

The process undertaken by the London Borough of Waltham Forest complied with the appropriate Government regulations as well as the Council's own adopted Statement of Community Involvement.

This consultation stage was carried out in late 2017, with the advertised period for the council to receive comments running from **Monday 6 November** to **Friday 22 December 2017**.

[A full report on the Direction of Travel Consultation can be found here.](#)

This is a synopsis:

(i) bodies and persons invited to make representations under Regulation 18, Duty to cooperate bodies, in compliance with the Localism Act 2011

<b>Organisation</b>
LB Hackney
LB Newham
LLDC
LB Haringey
Historic England

LB Redbridge
Epping Forest
Enfield
Conservators of Epping Forest

**Other consultees/respondents**

Area Planner Canal & River Trust
Aviva Investors
Berkeley Homes (North East London) Ltd
Campaign to Protect Rural England (CPRE)
Canal & River Trust
Capital & Regional
Capital growth
Catalyst Housing & swan housing asc
Civic Society
Consultation Service Natural England
Corporation of London
Environment Agency
Greater London Authority
HHGL Ltd
Highams Park Planning Group
Highways England Company Limited
Historic England
Kentucky Fried Chicken (Great Britain) Limited
LB Redbridge
Lee Valley Regional Park Authority

London Parks & Gardens Trust
Metropolitan Police Service
Planning Specialist Environment Agency
Planning Watch Convenor Civic Society
RB of Kensington & Chelsea
Rentplus UK Ltd
Save Lea Marshes
South East England Regional Office RSPB
Sport England
Thames Water Utilities Ltd
The Community Food Growers Network
Transport for London
Young & Co. Ltd.

**(ii) Consultation methods under Regulation 18**

Consultation methods included:

- Advertisements on the Council's website and Limehouse (the responses portal now replaced by Objective)
- An advert and legal notice in the Waltham Forest News newsletter, which the council delivers free of charge to the borough's residents
- a pre-paid self-addressed letter was sent to contacts on the planning policy online database, including specific and general Consultation Bodies (as stated in the Statement of Community Involvement)
- duty to cooperate meetings with prescribed organisations including neighbouring local planning authorities and government organisations
- ward forum events
- public events in local libraries
- leaflet handed out at engagement roadshows
- questionnaire

Representations were made via the online portal (Objective), by email and by post.

**(iii) main issues raised by the representations made pursuant to Regulation 18**

These are tabulated in the [Direction of Travel Responses document](#).

**(iv) How representations made pursuant to Regulation 18 have been taken into account**

These are tabulated in the [Direction of Travel Responses document](#).

This Direction of Travel consultation helped identify the key planning issues likely to face Waltham Forest over the next 15 years. Alongside a raft of evidence base studies, including the [Waltham Forest Character and Intensification Study 2019](#), it helped shape the policies and priorities set out in the Draft Local Plan, published for further Reg 18 consultation in July 2019.

## Appendix 1.2: Reg 18b consultation (Draft Local Plan)

Responses to the 2017 Direction of Travel document helped shape the policies and priorities of the Draft Local Plan, published in July 2019.

Evidence Base studies prepared included:

[Waltham Forest Character and Intensification Study 2019](#)

The Draft Local Plan was consistent with the National Planning Policy Framework and its supporting Planning Practice Guidance. It was also in 'general conformity' with the London Plan, and where appropriate, took account of Supplementary Planning Guidance (SPG).

### **(i) Bodies and persons the local planning authority invited to make representations under regulation 18**

All borough residents were invited to make representations through various events and communications (see ii).

#### **Bodies consulted under Duty to Cooperate**

<b>Consultation bodies</b>
Barts Health Trust
British Telecom
BT
Canals & River Trust
CCG
City Airport
City of London/Conservators of Epping Forest
Civil Aviation Agency
Environment Agency
Epping Forest District Council

Essex County Council
Heathrow Airport
Highams Park Planning Group
Highways Agency
Historic England
Hyperoptic
Lee Valley Regional Park
Lee Valley Regional Park Authority
London Ambulance Service
London Borough of Enfield
London Borough of Hackney
London Borough of Haringey
London Borough of Newham
London Borough of Redbridge
London Fire Brigade
London Legacy Development Corporation
Mayor of London/Greater London Authority
Metropolitan Police
Mobile Operators Association
National Grid
Natural England
Network Rail Infrastructure Ltd
North East London NHS Foundation Trust
Optimity

Orange Communications Ltd
Plusnet
SKY
Sport England
Stansted Airport
TalkTalk
Thames Water
Transport for London
UKPN
Virgin Media

## **(ii) How those bodies and persons were invited to make representations under Regulation 18**

The formal public consultation ran from Monday 22 July 2019 until midnight on Monday 30 September 2019 – longer than the statutory six-week period. This drew public attention to the Draft Local Plan and allowed residents to ask questions before encouraging them to submit formal representations through the following channels: online, by email, and by post. Copies of the Draft Local Plan were made available in local libraries across the borough. Supporting documents such as those comprising the evidence base were available online.

### **Leaflets**

An introductory leaflet was delivered from Monday 22 July 2019 to households and businesses across the borough. Separate leaflets were produced for each of the three geographic areas of the borough - North, Central and South - outlining the proposed policy approach for managing growth and change locally. Download the leaflets:

- [Shaping the Borough: North Waltham Forest](#)
- [Shaping the Borough: Central Waltham Forest](#)
- [Shaping the Borough: South Waltham Forest](#)

## **Public Notice**

A formal public notice was published in Waltham Forest News (Issue 228, Summer 2019).

## **Emails**

In addition, emails were sent out to all registered contacts on the Council's Planning Policy Consultation Portal (Objective). This includes residents, stakeholders and specific/general consultation bodies.

## **Community events**

There were a number of events where residents could drop in, see the proposals and comment on them. These were publicised on social media and via the Local Plan email newsletter.

- Wednesday 31 July, 6pm until 8.30pm, Chingford Assembly Hall, Station Road, Chingford, E4 7EN
- Saturday 4 August, 2pm until 9pm, Waltham Forest Mela, Leyton Jubilee Park, Seymour Road, Leyton, E10 7BL
- Wednesday 31 July, 6pm until 8.30pm, Chingford Assembly Hall, Station Road, Chingford, E4 7EN
- Saturday 4 August, 2pm until 9pm, Waltham Forest Mela, Leyton Jubilee Park, Seymour Road, Leyton, E10 7BL
- Friday 9 August, 9.30am until 11am, Planning Agents Briefing Breakfast on Draft Local Plan, Town Hall, Forest Road, Walthamstow, E17 4JF
- Monday 12 August, 4pm until 8.30pm, Score Centre, 100 Oliver Road, Leyton, E10 5JY
- Thursday 15 August, 4pm until 8.30pm, Wood Street Library, Forest Road, Walthamstow, E17 4AA
- Saturday 31 August, 1pm to 8pm, Chingfest, Ridgeway Park, Old Church Road, Chingford, E4 6RS
- Saturday 7 September, 10am until 4pm, Hale End Library, Castle Avenue, Highams Park, E4 9QD
- Saturday 14 September, 10am until 3pm, Walthamstow Wetlands. 2 Forest Road, London N17 9NH
- Wednesday 18 September 2019, 11am to 4pm, Main Outpatients Department, Lower Ground Floor, Whipps Cross Hospital, Whipps Cross Road, Leytonstone, E11 1NR. A drop in event at Whipps Cross Hospital Open Day when the NHS Trust's options for redevelopment of the site were also available for residents' comments.
- Saturday 21 September, 10am until 5pm, Leytonstone Library, The Space, Leytonstone Library, Church Lane, Leytonstone, E11 1HG. There were also meetings for specific groups to comment on the proposals:
- Wednesday 11 September 2019, 7pm to 8.30pm, Chingford Assembly Hall, Station Road, Chingford, E4 7EN. This was a Focus Group Workshop event.
- Monday 16 September 2019, 7pm to 8.30pm, Canons Farm Kitchen, 102 Cann Hall Road, Leytonstone, E11 3NJ. Focus Group engagement event with Cann Hall Area Residents' Association (CHARA) committee. This event was only for people invited by CHARA.

- Tuesday 17 September 2019, 12.30pm to 2pm, Walthamstow Connecting Conversation on Draft Local Plan, The Garden Room, The Mill, 7-11 Coppermill Lane, Walthamstow, E17 7HA. This was a Focus Group Workshop event.
- Wednesday 18 September 2019, 5pm to 6pm, Innovation Lab, Town Hall, Forest Road, Walthamstow, E17 4JF. Waltham Forest Youth Forum consultation.
- Monday 23 September 2019, 12.30pm to 2.30pm, Leyton Connecting Conversation on Draft Local Plan, Community Room, The Score Centre, 100 Oliver Road, Leyton, E10 5JY. This was a Focus Group Workshop event.
- Friday 27 September 2019, 12 noon to 2pm, Leytonstone Connecting Conversation on Draft Local Plan, Epicentre, 41 West Street, Leytonstone, E11 4LJ. This was a Focus Group Workshop event.

### **(iii) Summary of the main issues raised by the representations made pursuant to regulation 18**

In total, 401 submissions were made to the 2019 Reg 18 consultation (342 from individuals and 59 from organisations) involving 2,655 comments. There were two signed petitions: from Save our Suburbs and Highams Park Residents.

A consultation report was published online in June 2020 entitled Shaping the Borough: Draft Local Plan (July 2019) consultation report. This 720-page document lists all the individual comments made and the Council's response to each. These have informed the next iteration of the Local Plan – the [Proposed Submission Version](#).

These are the main issues raised and the action taken:

## Shaping the Borough - Waltham Forest Draft Local Plan (July 2019) Consultation Report Schedule of Comments and the Council's Response

### Summary of Main Issues

	Issue	Comment /Action
1	Impact of growth on character of local areas arising from growth targets, intensification/higher density and tall buildings.	There is public expectation that plan targets for housing growth would be reduced. This matter is being considered.  Officers have commissioned further work on building height/tall buildings.  It is proposed to amend the policy on intensification for better clarity and interpretation, also referring to building height.
2	Relationship between the Council's Local Plan and the Highams Park Neighbourhood Plan – that the Local Plan must take into account the policies and proposals of the Highams Park Neighbourhood Plan.	Officers' position is that a neighbourhood plan cannot determine the strategic direction of the Local Plan. Rather, a neighbourhood plan must be in conformity with the Local Plan and deliver the strategic aspirations for the local area as set at the higher level of the borough-wide Local Plan.
3	The plan should give greater focus to environmental protection - the impact of growth on the natural environment.	The plan will be supported by a Habitats Regulations Assessment and Sustainability Appraisal. Both projects (currently in progress) will assess the impact of plan policies and proposals on the environment.
4	Inadequate protection and recognition given to Special Areas of Conservation (SAC) - in particular, Epping Forest SAC.	Officers are currently working with Natural England, neighbouring boroughs and the GLA on mitigation measures. Current policy approach as set out the draft Plan will be reviewed.
5	The plan needs to give greater focus to health and safety issues.	There has been joint working with the Public Health Team. It is proposed to review the Chapter on Health and Wellbeing for better focus - incorporating health related issues such as air quality/pollution, community safety, social cohesion, noise, active travel, well designed homes for mental wellbeing, etc.
6	Lack of site-specific details.	A site-specific allocations document has been introduced. Work has commenced on this document.
7	Need for supporting social infrastructure (education/schools and health provision) and physical infrastructure (utilities) to support growth.	Work is in progress to support the Plan with an Infrastructure Delivery Plan. It will set out details of the Borough's infrastructure requirements - what is needed, where it is needed and when.
8	Transport implications arising from growth and provision of improved transport infrastructure – rail stations and capacity, bus routes, cycling routes, car parking, car-free developments, road capacity, managing congestion, etc	A strategic transport review has been commissioned and is being undertaken by ARUP.

	<b>Issue</b>	<b>Comment /Action</b>
9	Clarity on Green Belt/MOL de-designation – arising from concerns from CPRE, Save Lea Marshes and some residents.	The draft plan referred to the review of the Green Belt/MOL areas indicating that some land parcels could be de-designated. After careful consideration, this reference in the plan is to be deleted.
10	Protection of open spaces – arising from concerns expressed by Sports England about the need to protect playing fields and residents’ concerns about the loss of open spaces.	Officers are considering the findings of the draft Playing Pitch Strategy and Green Infrastructure Study recently completed and submitted by Consultants. Findings of these studies will be incorporated in the final plan.
11	Improving the quality of residential accommodation and amenity space, how to secure high-quality design through the entire planning and construction process to completion.	There are policies on residential space standards and amenity standards, these will be reviewed and where necessary strengthened. Work is also progressing on the Urban Design SPD.
12	Protection of heritage assets, also relating to Archaeological Priority Zones (APZ). Existing designated zones have not been reviewed for many years and need updating.	Officers are liaising with Historic England in commissioning further work to review existing APZs.
13	Concerns about flooding, water mitigation and rainwater management.	The plan contains policies on flooding. Further evidence on Strategic Flood Risk Assessment (Level 2) is being undertaken and will inform the final plan.
14	The plan needs to properly address the challenges facing town centres. The Council has abandoned the centres in the North of the borough.	Officers intend to review existing designated frontages and designate Primary Shopping Areas in all centres. Work is in progress on a High Street Strategy for some centres.
15	Climate change emergency and the local plan response.	It is proposed to review the Climate Change Chapter of the Plan – incorporating where relevant actions identified from the Climate Emergency Commission.
16	Affordable Housing has been raised as a high priority for residents particularly providing social housing and housing that is genuinely affordable for people living in the borough.	Officers intend to follow the GLA/ Mayor of London’s approach on affordable housing as it has been delivering results. In terms of delivering social housing, the Council response is through direct delivery of social housing and other affordable housing. Officers will be preparing an Affordable Housing and Viability SPD to support the Plan.
17	Issues were raised by respondents on how best to meet the housing requirements of an aging population.	Officers will review the policies around housing for older people, in addition to other wider housing needs, with Housing Strategy and Adult Social Services.

	Issue	Comment /Action
18	The approach to industrial intensification has been raised by the GLA that it needs to be modified to be in general conformity with the London Plan. Developers and landowners have made comments about wanting to deliver residential on Strategic Industrial Land, which is not in accordance with draft London Plan policies.	<p>Officers have been working with the GLA to respond to their comments and are working on a borough-wide Industrial Land Audit to better understand what exists and if it is being efficiently used. Where inefficiency is found this presents a possible opportunity for industrial intensification and may be realised in future for alternative uses.</p> <p>To ensure that there is sufficient guidance and certainty for developers and landowners on this approach, and to let them know where opportunities for industrial land release or further industrial intensification may be and how it can be delivered.</p>

**(iv) How representations made pursuant to regulation 18 were taken into account prior to publication of Reg 19 version**

**Key changes made to the draft Local Plan in response to Reg 18 engagement**

- Clarified the Council’s Planning Policy Framework by adding a second Local Plan document to set out the detail of where the proposed growth could potentially happen. The Local Plan thus became two development plan documents Local Plan Part 1: Strategic Policies (submitted her for inspection following Regulation 19 consultation) and the draft Local Plan Part 2: Site Allocations (which has recently finished Regulation 18 consultation).
- Policies reworded. A conscious effort was made to cut out planning jargon and simplify language in order to make the document clearer for everyone to understand and interpret
- Introduced a new policy ‘Infrastructure Provision for Growth’ setting out how planning decisions on infrastructure provision will be made. This is to address issues raised about infrastructure provision
- More areas of the Borough referenced such as Walthamstow Village and Higham Hill
- Highams Park Neighbourhood Plan acknowledged as part of the Council’s Local Plan

- Policy on town centre revitalisation / regeneration strengthened to encourage centres to re-imagine themselves and adapt to change (eg Covid 19)
- Revised policy on taller/tall buildings for better clarity and interpretation – clarifying appropriate locations and how decisions on building height will be made
- Transport policies revised to promote more active travel, walking, cycling and public transport, and revisions made to parking standards
- Archaeological Priority Areas reviewed. Changes made to area boundaries
- Stronger policy protection for Epping Forest Special Area of Conservation (SAC)
- New policy on trees introduced to encourage new trees, protect and manage their loss
- Strengthened Parks and Open Spaces policy for better clarity and interpretation
- Climate change policies refocussed to address the Climate Emergency

Please refer to the Schedule of Changes document for detail of changes to each section.

#### **4) Conclusion**

Appendix 1a sets out the Reg 18 consultations on the Direction of Travel document (2017) and Appendix 1b sets out the Reg 18 consultations carried out for the Draft Local Plan (2019), including details of the consultation database and consultation methods undertaken. Links to relevant documents have been included – these are also held in the Document Library that accompanies this report. In addition, proof of statutory public notices is included in Appendix 3.

Waltham Forest has therefore met the requirements of Regulation 22(1)(c) (i) to (iv) in accordance with the Statement of Community Involvement 2014

## Appendix 2: Reg 19 consultation

### 1. Introduction

Waltham Forest Council published its Local Plan (LP1) - Strategic Policies Document has now reached the Proposed Submission Stage document on 26 October 2020. Under Reg 19 of the Town and Country Planning (Local Planning) (England) it was subject to seven weeks of consultation, from Monday 26 October to Monday 14 December 2020. This ran concurrently with the Reg 18 consultation for Local Plan Part 2 (LP2) – Site Allocations, which took place for the longer period of 24 September to 14 December 2020.

The consultation coincided with a period of national health emergency and severe and changing government restrictions due to Covid 19. Despite this, consultation included both digital and non-digital methods to ensure residents without digital access were fully included. Face-to-face consultation was carefully designed to be compliant with Covid legislation in place at the time and subject to stringent risk assessment and sign off by the Borough's Director of Public Health.

In relation to LP1, a total 754 comments were received, submitted by 210 respondents.

### 2 Who was consulted under Regulation 19 and how that was undertaken?

Upon publication, a formal notification email was sent to 342 individuals and 59 organisations who responded to the Reg18 consultation, as well as everyone who had signed up to receive updates via email newsletter. There is some overlap between these groups.

The following measures were also taken in order to reach the broadest cross section of the borough, within Covid-19 restrictions in place at the time:

#### Printed leaflets

These were distributed from 24 September to all residential and business addresses in the borough with copies of Waltham Forest News. These gave information about both LP1 and LP2, flagging up both upcoming consultations.

## **High-street drop-in stalls**

A programme of six stalls were set up at weekends to provide information and invite responses to both LP1 and LP2 consultations. These were advertised by email newsletter, social media, and in the printed leaflets. They were publicly visible and open to all. They were as follows:

### **South WF**

Saturday 3 October 2020, stall at Bakers Arms crossroads

Attendance: Approx 60 residents and passers by

Saturday 10 October 2020, stall at Leytonstone High Road/Grove Road

Attendance: Approx 40 residents and passers by. Also conversations with some local businesses on the high street

### **CENTRAL WF**

Thursday 1 October 2020, stall at Walthamstow Town Square, beside street market

Attendance: Approx 40 residents and passers by. Plus leaflets handed out to people at the market and queuing for bank and library. Leaflets also left in some high street shops

Sunday 11 October 2020, stall at Troubridge Sq, outside new Wood St Library

Attendance: Approx 40 residents and passers by. Leaflets handed out to local businesses and topped up in library.

### **North WF**

Saturday 26 September 2020, stall at Chingford Mount Market

Attendance: talked to approx. 80 market users and specific visitors

Saturday 17 October 2020, stall at North Chingford Market

Attendance: more than 100 bookings in advance, probably 200 people on the day plus some passers by using high street/market

- **Seven online community meetings** were held to provide information and invite responses to both LP1 and LP2. These were advertised by email newsletter and social media, and flagged up in the printed leaflets. They were as follows:

### **South Waltham Forest**

Monday 9 November 2020, online engagement for SWF residents (Zoom)

Attendance: 20 bookings

Tuesday 24 November 2020, online engagement for SWF residents (Zoom)

Attendance: 52 bookings

### **Central Waltham Forest**

Tuesday 10 November 2020, online engagement for CWF residents (Zoom)

Attendance: 15 registrations

Wednesday 25 November 2020, online engagement with CWF Residents

Attendance: 55 registrations

### **North WF**

Thursday 12 November 2020, online engagement for NWF residents

Attendance: 26 bookings

Monday 23 November 2020, online engagement for NWF residents

Attendance: 203 bookings

### **Young Advisors**

Monday 16 November 2020, online engagement with WF Young Advisors

Attendance: 10 Young Advisors, aged 16-25

### **Ward Councillor meetings**

Three online briefings and three online consultations were held for **ward councillors**. Councillors were personally invited by email. These were held on the following dates:

Monday 7 September 2020, online pre-engagement briefing for WFS ward cllrs

Attendance: 21 Cllrs

Wednesday 9 September 2020, online pre-engagement briefing for WFC ward cllrs

Attendance: 6 Cllrs

Monday 14 September 2020, online pre-engagement briefing for WFN ward cllrs

Attendance: 20 Cllrs

Monday 19 October 2020, online engagement for SWF ward cllrs (MS Teams)

Attendance: 21 Cllrs

Tuesday 20 October 2020, online engagement for CWF ward cllrs (MS Teams)

Attendance: 24 Cllrs joined the meeting

Monday 26 October 2020, online engagement for NWF ward cllrs

Attendance: 9 cllrs joined the meeting

### **Stakeholder meetings**

In addition, officers arranged one-to-one meetings with key stakeholders and attended some online meetings hosted by community groups and ward forums.

### **Email newsletters**

- [Download Local Plan email newsletter 14 December 2020](#)
- [Download Local Plan email newsletter 18 November 2020](#)
- [Download St James' Quarter email newsletter 22 October 2020](#)
- [Download Leytonstone email newsletter 10 October 2020](#)
- [Download the Local Plan email newsletter for Priory Court 8 October 2020](#)
- [Download the Local Plan email newsletter on Hylands Road 7 October 2020](#)
- [Download the Local Plan email newsletter 7 October 2020](#)

### **HIGHAMS PARK PLANNING GROUP**

Following the neighbourhood plan referendum in March 2020, the Highams Park Neighbourhood Plan was adopted as part of the local development plan on 21 May 2020. Since the making of the plan, officers have maintained a regular schedule of three-monthly meetings with the Highams Park Planning Group in order to cover issues related to the Local Plan arising from consultation, current regeneration aspirations and applications and the disbursement of local CIL.



Section/Chapter	Issue	Comment
<p>Main respondents:</p> <ul style="list-style-type: none"> <li>• Historic England</li> <li>• Black Rock/ NEAT</li> <li>• TfL</li> </ul>	<p>a) to appropriately reference the historic environment,</p> <p>b) to provide policy support/recognition to the Blackhorse Lane CEZ (Creative Enterprise Zone) and</p> <p>c) to acknowledge the potential of Walthamstow Central.</p>	
<p>Chapter 8 – Decent Homes for Everyone</p> <p>Main respondents:</p> <ul style="list-style-type: none"> <li>• Mayor of London</li> <li>• WF Conservative Party</li> <li>• Inspired Villages</li> </ul>	<p>a. Suggestion from Mayor of London that the Council should set out its intention to meet the London Plan target of 1264 and incorporate the 359 new homes small site target.</p> <p>b. Alignment of SHMA and tenure/size mix</p> <p>c. Older persons accommodation use class (and relationship to affordable housing contributions)</p>	<p>The Council has identified further changes to the Plan as included in the Schedule of Proposed Changes to the Published Plan.</p> <p>The Council considers that SHMA and tenure/size mix are well aligned.</p>
<p>Chapter 9 – Building a Resilient and Creative Economy</p> <p>Main respondents:</p> <ul style="list-style-type: none"> <li>• Mayor of London</li> <li>• Industrial landowners/ developers</li> </ul>	<p>a. Relationship of London Plan LSIS and Local Plan LSIS and BEA (and inclusion of B1 office uses as acceptable in BEA)</p> <p>b. Objections to usage of floorspace as basis for measuring industrial capacity.</p>	<p>The Council has identified further changes to the Plan as included in the Schedule of Proposed Changes to the Published Plan. This seeks to clarify the matters raised. The Plan includes a commitment to prepare an Industrial Intensification SPD to support the implementation of the Local Plan.</p>

Section/Chapter	Issue	Comment
	<ul style="list-style-type: none"> <li>c. Disagreement with character and visions (Appendix 2)</li> <li>d. Affordable Workspace threshold.</li> </ul>	
<p>Chapter 12 – Social and Community Infrastructure</p> <p>Main respondents:</p> <ul style="list-style-type: none"> <li>• WF Conservative Party</li> </ul>	<p>Infrastructure planning is insufficiently visible in the Plan. Not clear how infrastructure planning will be approached, how infrastructure needs to be assessed, what infrastructure will be created and where.</p>	<p>An Infrastructure Delivery Plan has been prepared and published. Appendix 1 of this document provides a schedule of infrastructure projects.</p> <p>Policy 3 of the Local Plan sets out the Council’s commitment to ensure timely provision of infrastructure to support growth. Parts G and H of the policy makes clear that new infrastructure should be operational no later than the completion of the development or during the phase in which it is needed, and that the Council would refuse planning permission where prescribed conditions cannot be met.</p>
<p>Chapter 13 – Promoting Health and Well-being</p> <p>Respondent:</p> <ul style="list-style-type: none"> <li>• Malcolm Souch (NHS London Healthy Urban Development Unit)</li> </ul>	<p>a) Policy 51 (Health Impact Assessments) should be revised for better interpretation - where it applies to all major developments and proposals for takeaways, betting shops and payday loan shops. Appropriate reference should be made to HIA tools and the Healthy Urban Planning Checklist.</p>	<p>Revision to policy wording accepted. The Council has identified further changes to the Plan as included in the Schedule of Proposed Changes to the Published Plan.</p>

Section/Chapter	Issue	Comment
<ul style="list-style-type: none"> <li>• McDonald's Restaurants</li> </ul>	<p>b) Policy 54 (Hot Food Takeaways) is too restrictive. It imposes a blanket ban on restaurants that include an element of hot food takeaway within 400 metres of the boundary of a nursery, a primary school, a secondary school, a community college or youth facilities. It is discriminatory and disproportionate and not informed by justified evidence.</p>	<p>This policy is carried over from the adopted plan and aligns with Policy E9 (D) of the London Plan 2021.</p>
<p>Chapter 14 – Creating High Quality Places</p> <p>Main respondents:</p> <ul style="list-style-type: none"> <li>• David Matson</li> <li>• Robert Gay</li> <li>• Mike Chrimes</li> </ul> <p>Main respondents:</p> <ul style="list-style-type: none"> <li>• LB Newham</li> <li>• Lauren Whiteley</li> <li>• Mike Chrimes</li> </ul>	<p>a) Policy 56 - Objections to high-rise buildings and their impact on the character of local areas.</p> <p>b) Policy 57 (Tall/Taller buildings) – further clarification required as a loose definition could lead to taller/tall buildings significantly altering the character of neighbourhoods. Revisions to the policy suggested.</p>	<p>The plan sets out a strategic policy approach to be supported by site specific details set out Site Allocations Documents and Masterplan SPDs.</p> <p>For better clarity and interpretation of the policy, the Council has identified further changes to the Plan as included in the Schedule of Proposed Changes to the Published Plan.</p>

Section/Chapter	Issue	Comment
<p>Chapter 15 – Active Travel, Transport &amp; Digital Infrastructure</p> <p>Main respondents:</p> <ul style="list-style-type: none"> <li>• Transport for London</li> <li>• City of London Corporation</li> <li>• Waltham Forest Conservative Party Cllrs Group</li> <li>• Thames Water</li> <li>• LB Redbridge</li> </ul>	<ul style="list-style-type: none"> <li>• Transport - Difficulty of moving from south to north of the borough, access to other parts of the borough needs to be addressed.</li> <li>• CPZ, car- free developments, parking standards – impact of the policy on overall parking provision.</li> <li>• Bus provision – suggested changes to Policy 62(i) proposed.</li> <li>• Opportunities to improve active travel and bus connections between Waltham Forest and neighbouring boroughs.</li> <li>• Support for other transport modes – e-scooters, horse riders and other.</li> <li>• Rigorous approach and evidence on reducing car use required.</li> <li>• Proposal to reinstate the Hall Farm Curve needs further consideration/review.</li> </ul>	<p>For better clarity and interpretation of the policy, the Council has identified further changes to the Plan as included in the Schedule of Proposed Changes to the Published Plan.</p>
<p>Chapter 16 Enhancing and Preserving our Heritage.</p> <p>Main respondents:</p> <ul style="list-style-type: none"> <li>• Historic England</li> <li>• LBWF Resident</li> </ul>	<p>Clarity needed to ensure that non-designated archaeological assets are demonstrably equal in significance to designated assets and are subject to the same policy considerations.</p> <p>Inadequate protection given to conservation areas with regards to</p>	<p>For better clarity and interpretation of the policy, the Council has identified further changes to the Plan as included in the Schedule of Proposed Changes to the Published Plan.</p>

Section/Chapter	Issue	Comment
	<p>Chingford Green conservations area / library site.</p> <p>Clarification to Policy 75 (D) to make clear that an archaeological investigation should be undertaken and that the council will draw on appropriate expert advice.</p> <p>Clarity - Inclusion of structures, artefacts, or parks and gardens as well as buildings.</p>	
<p>Chapter 17 Protecting and Enhancing the Environment</p> <p>Main respondents:</p> <ul style="list-style-type: none"> <li>• City of London</li> <li>• Conservators of Epping Forest</li> <li>• Epping Forest District Council</li> <li>• Natural England</li> </ul>	<p>Key concerns relating to Epping Forest SAC (Policy 83):</p> <ul style="list-style-type: none"> <li>• the quantum of development proposed in the Submission Local Plan (LP1) and in-combination impacts.</li> <li>• issues regarding the HRA document prepared and its conclusions in relation to the impacts on the Forest.</li> <li>• Lack of a SANGs Strategy with specific measures to provide certainty of mitigation for Epping Forest Special Area of Conservation (EFSAC).</li> <li>• Lack of costed and precise SAMMS mitigation measures.</li> <li>• The need for an air quality assessment.</li> </ul>	<p>The Council is actively participating with partners through the Epping Forest MoU group and partner agencies to formulate and implement an effective and enduring mitigation strategy at both SAMMs and SANGs levels.</p> <p>The Council is presently working on scheme level mitigation strategies with stakeholders with the aim of producing a comprehensive mitigation strategy to be adopted as Supplementary Planning Document.</p>

Section/Chapter	Issue	Comment
	<ul style="list-style-type: none"> <li>• Need for a comprehensive EFSAC mitigation strategy to be agreed by all local authorities under a revised MoU.</li> <li>• Improved recognition for the City Corporation's current pattern of visitor facilities in the Borough and the Forest's 45% contribution to the Borough's green space provision.</li> </ul>	
<p>Chapter 18</p> <p>Addressing the Climate Change Emergency.</p> <p>Main respondents:</p> <ul style="list-style-type: none"> <li>• The Environment Agency</li> <li>• Thames Water</li> </ul>	<p>Suggested wording changes proposed for better clarity and interpretation on Policies 90, 92 and 93 relating to:</p> <ul style="list-style-type: none"> <li>• Measures to minimise exposure to poor air quality)</li> <li>• Thames water regions designated as "severely stressed".</li> <li>• Inclusion of preliminary desk-based assessments.</li> <li>• Consistency with national flood risk policy</li> </ul>	<p>For better clarity and interpretation of the policy, the Council has identified further changes to the Plan as included in the Schedule of Proposed Changes to the Published Plan.</p>

Exceptionally the Council has considered the need to make further changes to the Proposed Submission Document. This is set out in the Schedule of Proposed Changes to the Published Plan.

#### 4) Conclusion

As with the Reg 18 stage of the Local Plan, Regulation 19 consultation on the draft Local Plan notified statutory and general consultation bodies, stakeholders (residents and businesses) and invited them to comment through a range of channels (including online, email and post and publication in a local newspaper. The Council considered the representations received. The Council considers that the plan-making process conforms to the Statement of Community Involvement (2018) and has therefore fulfilled the requirements of Regulation 22.

### Appendix 3: Additional documentation

#### Reg 19 responses form and guidance note



LP1 Model  
Representation Form

#### Public Notice Reg 18a Direction of Travel consultation

Published in Waltham Forest News (issue 192, 6 November 2017, page 16)

<https://www.walthamforest.gov.uk/sites/default/files/WFN%20Issue%20192%20-%20web.pdf>

**Planning and Compulsory Purchase Act 2004  
TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND) REGULATIONS 2012 (REGULATION 18)  
Notice of Intention to Prepare a Development Plan Document – Waltham Forest Local Plan.**

**Comments on the proposed scope and content of the DPD should be submitted during the six week consultation period running from Monday 6th November to Friday 22nd December 2017.**

Waltham Forest Borough Council is preparing a new Local Plan. The Council is required to notify specified bodies and persons of the subject of the Local Plan which it proposes to prepare and invite each of them to make representations to the Council about what the Local Plan ought to contain. The Council's proposals are set out below.

- The new Local Plan will set out the strategic planning policies for managing growth and change in Waltham Forest during the period 2018-2033
- The new Local Plan will relate to the administrative area of London Borough Waltham Forest
- Consultation on the Local Plan will be guided by the Duty to Cooperate
- A Local Development scheme has been published setting out the timetable for the adoption of the new Local Plan by 2020.

Local Plan by 2020.

In preparing the new Local Plan, the Council will take into account any representations made in response to this consultation.

Representations can be submitted at: <http://walthamforest-consult.limehouse.co.uk/portal/pp/newlp/dot> or if you don't have access to the internet

you can write to us at:

Planning Policy Team,  
G08 Sycamore House,  
Waltham Forest Town Hall Complex,  
Forest Road,  
London, E17 4JF

Alternatively, comments can be sent to: [planning.policy@walthamforest.gov.uk](mailto:planning.policy@walthamforest.gov.uk)

Please note all comments will be held by the Council and will be available to view publicly. Comments cannot be treated as confidential. Your personal information such as your postal and e-mail address will not be published, but your name and organisation (if relevant) will.

London Borough of Waltham Forest maintains a database of consultees who wish to be kept informed about the Local Plan. In responding to this consultation your contact details will automatically be added to the consultation database (if not already held). If you do not want to be contacted about future Local Plan consultations please state this in your response. Should you wish to discuss any issues or require any further information please do not hesitate to contact the Planning Policy Team by email [planning.policy@walthamforest.gov.uk](mailto:planning.policy@walthamforest.gov.uk) **020 8496 3000**

## Public Notice Reg 18 Consultation, July 2019

A formal public notice was published in Waltham Forest News (Issue 228, Summer 2019, page 30)

<https://www.walthamforest.gov.uk/sites/default/files/WF%20News%20Issue%20Summer%202019%20Issue%20228.pdf>.



WF News Issue  
Summer 2019 Issue 2

## Public Notice of Reg 19 Consultation, October-December 2020

A formal public notice was issued in the Waltham Forest Guardian, online and print versions, on

[https://www.guardian-series.co.uk/announcements/public\\_notices/notice/144840.Planning\\_and\\_Compulsory\\_Purchase\\_Act\\_2004\\_TOWN\\_AND\\_COUNTRY\\_PLANNING\\_LOCAL\\_PLANNING\\_ENGLAND\\_REGULATIONS\\_2012/](https://www.guardian-series.co.uk/announcements/public_notices/notice/144840.Planning_and_Compulsory_Purchase_Act_2004_TOWN_AND_COUNTRY_PLANNING_LOCAL_PLANNING_ENGLAND_REGULATIONS_2012/)



Public Notice WF  
Guardian Oct 2020.pc



Public Notice WF  
Guardian print versior

## Notification email Reg 19

This was automatically generated on 26 October 2020 and sent to all previous respondents to the Local Plan Reg 18 consultation to alert them to the beginning of the Reg 19 consultation



Dear Sir/Madam

LP1 - Strategic Policies will be available for you to view and comment between the following dates:

Start date: 26/10/20 00:01

End date: 14/12/20 17:00

Please select the following link to view this event:

<https://walthamforest-consult.objective.co.uk/portal/pp/newlp/lp1-strategicpolicies>

If the link appears to be broken, please try copying the entire link into the address bar on your web browser.

This e-mail has been automatically generated by the Consultation software.

The information contained in this e-mail or in any attachments is confidential and is intended solely for the named addressee only. Access to this e-mail by anyone else is unauthorised. If you are not the intended recipient, please notify the administrator and do not read, use or disseminate the information. Opinions expressed in this e-mail are those of the sender and not necessarily the company. Although an active anti-virus policy is operated, the company accepts no liability for any damage caused by any virus transmitted by this e-mail, including any attachments.

To unsubscribe please click on the link below or paste it into your browser:  
<https://walthamforest-consult.objective.co.uk/common/unsubscribe.jsp?guid=18B3F192-BD8D-13AC-5D29-59D86BEED93F>

## Information leaflets

distributed July 2019 (Reg 18 consultation)

- [Shaping the Borough: North Waltham Forest](#)
- [Shaping the Borough: Central Waltham Forest](#)
- [Shaping the Borough: South Waltham Forest](#)

distributed September 2020 (Reg 19 consultation). These cover both LP2 and LP1

- [Download North Waltham Forest information](#)
- [Download Central Waltham Forest information](#)
- [Download South Waltham Forest information](#)

## Presentation slides Reg 19

for online community meetings November 2020 (Reg 19 consultation). These cover both LP1 and PL2

- [Download North Waltham Forest presentation](#)
- [Download Central Waltham Forest presentation](#)
- [Download South Waltham Forest presentation](#)

## Email Newsletters

Sent out during the autumn 2020 consultation for LP1 (Reg 19) and LP2 (Reg 18)

- [Download Local Plan email newsletter 14 December 2020](#)
- [Download Local Plan email newsletter 18 November 2020](#)
- [Download St James' Quarter email newsletter 22 October 2020](#)
- [Download Leytonstone email newsletter 10 October 2020](#)
- [Download the Local Plan email newsletter for Priory Court 8 October 2020](#)
- [Download the Local Plan email newsletter on Hylands Road 7 October 2020](#)
- [Download the Local Plan email newsletter 7 October 2020](#)