



'Shaping the Borough' - Waltham Forest Local Plan (LP1) Examination

Response to the Inspectors' Preliminary Matters

(5) Green Belt

August 2021

Paragraph 18

The Waltham Forest Focussed Green Belt and Metropolitan Open Land Assessment November 2019 recommends some boundary adjustments. Does the plan propose these, or any other, changes to the Green Belt boundary? If so, have these been included on the submitted policies map? Do the emerging key/strategic sites in LP2 indicate a likelihood of any changes being required to Green Belt or Metropolitan Open Land boundaries?

- 1.1 As background to the evidence regarding Green Belt and Metropolitan Open Land, the following key studies are relevant:

Green Belt and Metropolitan Open Land Review 2015 (LUC)

- 1.2 LUC was appointed by the London Borough of Waltham Forest (LBWF) to review the Borough's Green Belt and Metropolitan Open Land (MOL). The purpose of the review was to assess whether the Borough's existing Green Belt and MOL meet the purposes of these designations, as set out in the NPPF and the London Plan. The review comprises detailed commentary on the assessment of each parcel of land and makes recommendations on the potential to remove land from, or include land within, the designated areas, provided that the Borough can demonstrate the 'exceptional circumstances' required for such changes.
- 1.3 In addition the Review also makes recommendations on specific Green Belt or MOL sites where there are opportunities for enhancement but does not identify land for removal from Green Belt or MOL; its role is not to find the necessary exceptional circumstances for alterations to these designations, but to provide evidence on the relative performance of land parcels against the Green Belt purposes and MOL criteria.
- 1.4 The Review concludes that it is a matter for the borough to decide whether or not exceptional circumstances exist for making alterations to the existing Green Belt and MOL boundaries. This being the case, allocations of land for development would be taken forward through the Local Plan process.

Waltham Forest Focussed Green Belt and Metropolitan Open Land Assessment 2019 (LUC)

- 1.5 Following developer interest in some GB and MOL parcels, LUC was subsequently commissioned to undertake a focussed review of Waltham Forest's Green Belt and Metropolitan Open Land (MOL) in 2019. The study assessed the contribution of the Borough's Green Belt and MOL to the characteristics and purposes of the designations set out in the National Planning Policy Framework (2019) and the London Plan (2016). By drawing out variations in contribution the study provided insight into the Borough's Green Belt and MOL likely to be the most appropriate to accommodate development, if required
- 1.6 This report focuses on three locations within the Borough's Green Belt and MOL identified by the Council. It provides a more detailed assessment of the locations,

drawing on the latest methods and guidance, including an assessment of the 'harm' to the designations should all or part of the land be developed.

The locations are:

- Green Belt land off Shadbolt Avenue and Harbet Road, a small, enclosed site which is the subject of a current planning application. (GB Area 1)
- MOL at the Lee Valley Ice Centre, which the Lea Valley Park Authority wishes to redevelop.
- MOL at Waterworks Visitor Centre, which has also been considered by the Lea Valley Park Authority as a potential development site.

- 1.7 Additionally the assessment reviews the alignment of the Borough's existing Green Belt and MOL boundaries. Where the existing boundaries do not follow readily recognisable and permanent physical features, recommendations for minor boundary adjustments are made in line with paragraph 139 of the NPPF.

Waltham Forest Green and Blue Infrastructure Strategy 2020 (LUC)

- 1.8 In addition to the above, in 2019 the Council commissioned LUC to develop a Green & Blue Infrastructure Strategy (GBIS) with the aim of providing up-to-date evidence to support the emerging Local Plan and to ensure conformity with London plan policies and the requirements set out in the NPPF.
- 1.9 The aim of the GBIS is to emphasise the importance of green and blue infrastructure and to ensure that this is reflected within the Local Plan in recognition of the role it plays in creating resilience to climate change through minimising the impact on the natural environment and sustainable development. Accordingly the GBIS is intended to provide a coherent approach to enhancing and strengthening the existing green and blue infrastructure network and as such provides guidance and support for the future delivery and management of open spaces, play provision, biodiversity, climate change resilience, health and well-being, active travel and cultural assets; all of which have a symbiotic relationship to Green Belt and MOL.

Issues Arising

- 1.10 The 2015 Study drew the attention of the Council to fringe areas of Green Belt such the Chingford Island/Harbet Road/Shadbolt Avenue parcel (GB32 in this study) where it was felt that options to adjust Green Belt boundary existed. As set in para 4.10 of the Study, it was considered that this area generally performs poorly against all Green Belt purposes, apart from Purpose 2, which considers the role of Green Belt in preventing merging.
- 1.11 In 2019 the same site (renamed GB Area 1) was revisited for the updated study. The conclusion that the 2015 study had reached – that the site performed poorly, was modified as follows:

“While land to the south of Harbet Road contains urbanising influences, its development would weaken the settlement gap at one of its narrowest points. Therefore, development of this area in isolation and in combination with the land to the east would cause moderate harm. The land to the east of Shadbolt Avenue is more influenced by the inset urban edge than land to the west of Shadbolt Avenue;

however, its development would increase containment of the land to west between the avenue and the river channels, which form stronger boundary features than the existing Green Belt boundary.

Therefore, development of this area and the area as a whole would cause moderate harm.”

- 1.12 The Council noted the recommendations of the 2015 Study which at para 4.5 and Figure 3 set out potential areas for minor boundary redefinitions. However the difference in the conclusions of the 2015 and 2019 assessments did not rule out Green Belt harm to the extent that the Council felt that there would be a strategic case that Green Belt boundary adjustment would deliver any measurable benefits in either developmental or Green Belt terms. Accordingly, no changes have been made to the Policy Map.

Do the emerging key/strategic sites in LP2 indicate a likelihood of any changes being required to Green Belt or Metropolitan Open Land boundaries

- 1.13 Currently it is not anticipated that LP2 will include proposed changes to the boundaries of either GB or MOL. Strategic sites within these areas are considered to be primarily brownfield in nature.
- 1.14 In accordance with National Planning Policy a review of the Green Belt/MOL should only be carried out in exceptional circumstances when a relevant Local Plan document is prepared or updated. The Council considers that such circumstances in Waltham Forest could only be justified where there is an over-riding need to accommodate development, which cannot be met elsewhere and where Green Belt/MOL offers the most sustainable option. The Green Belts/ MOL study undertaken has only sought to explore the potential such land could make in accommodating growth requirements, if required. Following the completion of the Growth Capacity Study 2019, sufficient capacity has been identified on brownfield land to accommodate growth. Accordingly, the Council's current planning strategy does not depend on the release of Green Belt land and therefore no alterations to Green belt and MOL boundaries are required at the present time.