



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

Response to the Inspectors' Matters, Issues & Questions

Additional Question 188

February 2022

Q188 Is Policy 80 consistent with the National Planning Policy Framework's approach to safeguarding open space and recreation facilities and does it set out appropriate criteria to deal with development proposals that could result in the loss of such facilities?

The NPPF at para 98 sets out that :

"Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate."

Policy 80 draws from the Council's Open Space Needs Assessment (2019) (OSNA), the Playing Pitch Strategy (2020) (PPS) and the Green and Blue Infrastructure Strategy (2020) (GBIS) and the broad conclusions of these reports back the retain position implicit in the policy. It also draws from London Plan Policy G4 (B) which states that development proposals should not result in the loss of protected open space and where possible create areas of publicly accessible open space, particularly in areas of deficiency.

Para 99 of the NPPF opens with the trenchant statement that "(e)xisting open space, sports and recreational buildings and land, including playing fields, should not be built on..." before going on to list criteria against which loss can be assessed, managed and compensated. Policy 80 echoes the requirements set out in para 99 in terms of ensuring adequate provision, protection, enhancement and retention. The policy also sets out the Council's expectations in relation to the contribution that can be made through development to existing open space.

The Council believes that the policy is consistent with both the London Plan and the relevant paragraphs of the NPPF in terms of the general ambitions for open space. In relation to the prevention of loss the Council proposes the following modification to deal with the prevention of loss at Policy 80 (E) :

"Permission will be refused for schemes resulting in unsubstituted loss of open space and the Council requires proposals for new development to provide or contribute to enhancing the quality of open spaces, indoor/outdoor sports facilities, playing pitches and/or their associated ancillary facilities and access; taking account of priorities set out in the Council's Playing Pitch Strategy where appropriate;"