**Waltham Forest Local Plan LP1**

Wednesday 16 March 2022 starting at 09.30am and 2.00pm

**Agenda**

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| Please Note:   * All participants are encouraged to familiarise themselves with the Hearing Statements (and any relevant evidence) produced by the Council and other parties in respect of the matters addressed at this session. These are available on the examination website. * References to Matters, Issues and Questions refer to those posed by the Inspectors in their Matters, Issues and Questions document (already circulated and on the examination website [LPE14]), unless otherwise stated. The areas for discussion relate to points on which the Inspectors require further information or clarification. * The morning hearing session will finish no later than 1pm, including a mid-morning break. The afternoon hearing session will finish by 5pm, including a mid-afternoon break. |

1. **Inspectors’ Welcome and Introductions**
2. **Matter 2: Vision, Strategic Objectives, the Spatial and Growth Strategy**

**Key Documents**

Strategic Housing Market Assessment for London Borough of Waltham Forest (2019) (EB4.1)

Growth Capacity Study (2018) (EB6.2)

Waltham Forest Employment Land Study (2019) (EB6.1)

Modifications Table (LPE5)

**Issue 1 - Whether the vision and strategic objectives have been positively prepared and are justified, effective, consistent with national policy and in general conformity with the London Plan with regard to the achievement of sustainable development**

*Key areas for discussion:*

* Is an additional strategic objective relating to the historic environment necessary for the soundness of the Plan? (Question 26)
* Whether Policy 1 which states that “A presumption in favour of sustainable development will be applied to all development management decisions” is consistent with paragraph 11(d) of the National Planning Policy Framework (Question 27)

**Issue 2 - Whether the assessment of housing need and scale of housing and employment growth is justified, consistent with national policy and in general conformity with the London Plan**

*Key areas for discussion:*

* The scale of housing provision and the evidence that indicates that the Plan’s housing strategy is deliverable (Questions 29 and 30)
* The scale and distribution of employment land and whether it is aligned with the strategy for housing
* Whether the proposed changes to the Plan period have any implications for the housing and employment requirement (Question 31)
* Whether the overall level of growth is justified and whether the mitigation measures proposed to avoid adverse effects on the integrity of European sites are sufficiently developed/detailed to enable us to conclude that the requirements of the Habitats Regulations have been met (Question 32)

**Issue 3 - Whether the spatial strategy and the distribution of housing, employment and other development is justified, effective and in general conformity with the London Plan?**

*Key areas for discussion:*

* How the strategic locations and site opportunity locations have been identified. whether they are justified and how the scale of growth in each area has been arrived at (Questions 34 – 36)
* Whether the levels of growth to South, Central and North Waltham Forest in Policy 4 (Location of Growth) are justified and how they have been arrived at
* The approach to development ‘elsewhere in the Borough’ in Policy 4 (Question 38)
* Consistency between Policy 4 and Policies 9, 10 and 11 and the naming of strategic locations and Centres in those policies and the diagrams/figures in the Plan (Questions 34 - 37)
* The implementation of Policy 5 (Management of Growth) and the role of area based Supplementary Planning Documents and/or masterplans to guide and coordinate development within strategic location

* Green Belt and Metropolitan Open Land (Question 39)
* The strategic approach to air quality and flood risk (Questions 40 & 41)

*(Note – air quality and flood risk will be covered in more detail in Matter 5)*

**Issue 4- Whether the Plan’s growth strategy is deliverable including in development viability terms**

*(Note – Plan viability will be covered in more detail in Matter 8)*

*Key areas for discussion*

* The role of Policy 3 (Infrastructure for Growth) in securing key infrastructure and how it will be implemented (Question 43)
* The role of the Infrastructure Delivery Plan in delivering the Plan’s growth strategy
* Whether the required step change in the annual housing delivery rate is realistic and deliverable (Question 46)

**Review of Matter 2 main modifications necessary for the soundness of the plan**

1. **Close by 5pm**

**MATTERS ISSUES AND QUESTIONS**

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| **MATTER 2: VISION, STRATEGIC OBJECTIVES, SUSTAINABLE DEVELOPMENT AND THE SCALE OF GROWTH** |

**Issue 1 - Whether the vision and strategic objectives have been positively prepared and are justified, effective, consistent with national policy, and in general conformity with the London Plan with regards to the achievement of sustainable development (Vision, Objectives, Policy 1)**

Q25 What is the basis for the 6 ‘Golden Threads’, are they justified, and how do they relate to the vision and strategic objectives?

Q26 Are the 14 strategic objectives soundly based, justified by the evidence and is it clear how the Plan’s policies will help to deliver the vision and strategic objectives over the Plan period?

Q27 Is Policy 1 consistent with the NPPF’s approach to achieving sustainable development, including a sustainable pattern of development as set out at paragraph 11a, and will it be effective in informing proposals for new development?

Q28 Are any main modifications necessary for soundness?

**Issue 2 - Whether the assessment of housing need and scale of housing and employment growth is justified, consistent with national policy and in general conformity with the London Plan (Policy 2)**

Context – Policy 2 of the Plan sets out that a net increase of 27,000 homes (1800 dwellings per year) and 52,000 square metres of employment floorspace will be promoted over the Plan period. The London Plan sets out a housing target for Waltham Forest of 12,640 net completions over the 10 year period 2019/20 to 2028/29 (1,264 dwellings per year).

Note - Issues and questions relating specifically to Borough wide housing policies (Policies 13 – 24), are covered under Matter 3.

Q29 How has the scale of housing growth (27,000 additional homes) and employment floorspace (52,000 square metres) set out in Policy 2 been arrived at?

1. Has an appropriate methodology for assessing housing need and establishing the housing requirement been applied?
2. Are the housing and employment requirements/targets positively prepared?
3. Should the requirements be altered in the light of the Council’s intention to roll forward the plan period (as referred to in Q31)?

Q30 Is the housing requirement in Policy 2 in general conformity with the London Plan?

1. Should the Plan reflect the housing target for the Borough set out in table 4.1 of the London Plan?
2. If so, and having regard to the London Plan 10-year housing target for the Borough of 1,264 homes per year, how would the Plan’s housing requirement for years 11-15 be identified? What methodology would be used for calculating the housing requirement/target to the end of the plan period?

Q31 In responding to the Inspectors’ Preliminary Matters [LPE0], the Council proposes to roll forward the Plan period from 2020–2035 to 2021–2036 to cover a minimum 15-year period from its anticipated adoption date. What implications, if any, would this have for the evidence base supporting the policies in the Plan, and would this revised period be consistent with NPPF paragraph 22?

Q32 Overall, is the scale of housing and employment growth justified, including with regards to general conformity with the London Plan’s housing target for the Borough, the effect on Habitats Sites, and the findings of the Employment Land Study [EB6.1] and the Growth Capacity Study [EB6.2]?

Q33 Are any main modifications necessary for soundness?

**Issue 3 – Whether the spatial strategy and the distribution of housing, employment and other development is justified, effective and in general conformity with the London Plan? (Policies 3 - 11)**

Q34 Are the South, Central, and North Waltham Forest areas identified in Policy 4 justified by the evidence and how have they been defined?

Q35 Are the Strategic Locations referred to in Policy 4 justified, in particular:

i How have the 17 Strategic Locations in Figure 4.1 been identified?

ii Are they in general conformity with the London Plan Policy SD10 and how do they relate to the Strategic Areas for Regeneration identified in Figure 2.19 of the London Plan?

iii How will they contribute to achieving Good Growth (Policy 6) and growth in the related Opportunity Area?

Q36 Are the Site Opportunity Locations appropriate and justified, how have they been identified, what alternatives were considered, and will they support the planned level of growth?

Q37 Is Policy 4 consistent with Policies 9, 10 and 11 in terms of the locations identified and the geographical area covered? In particular:

* 1. Policy 9 (South Waltham Forest) includes Leyton Green as a Strategic Location but this is not included in in Policy 4(A);
  2. Policies 9, 10 and 11 refer to Strategic Locations whereas Policy 4 refers to a number of District Centres and Sewardstone Road Neighbourhood Centre. Is there a difference between a strategic location and a defined centre in terms of their geographical extent and the relevant policy approach in the Plan?

Q38 In Policy 4, is the level of growth ‘Elsewhere in Borough’ of 3,800 new homes realistic and justified? Would this have any implications for achieving sustainable patterns of development as sought by the NPPF and Policy 4?

Q39 The Council has confirmed in its response [LPE6] to the Inspectors’ Preliminary Matters letter [LPE0] that the Plan does not propose any changes to the Green Belt boundary or Metropolitan Open Land.

1. Is that approach justified and is there any likelihood of changes being required to the Green Belt or Metropolitan Open Land boundaries in relation to potential site allocations in LP2?
2. Has the Council considered longer term development needs and should ant areas of safeguarded land be identified?

Q40 Is the spatial strategy consistent with national policy on flood risk? Has the Plan been informed by a Strategic Flood Risk Assessment based on the most up-to-date flood risk data and climate change allowances and taking advice from the Environment Agency?

Q41 Is the spatial strategy and scale of growth justified and consistent with national policy in respect of the effect on air quality in the Borough?

Q42 In terms of this issue, are any main modifications necessary for soundness?

**Issue 4 – Whether the Plan’s growth strategy is deliverable including in development viability terms (Policies 2, 3, 4 and 12)**

Q43 At a strategic level, will Policy 3 be effective in meeting the additional infrastructure required to support the level of growth proposed?

Q44 Is the Plan’s scale and distribution of housing and employment growth financially viable including with regards to normal development costs and mitigation, and all relevant policy costs including affordable housing, habitats mitigation, infrastructure contributions, space and accessibility standards, and building and design requirements etc?

Q45 Is there any disconnect in between demonstrating deliverability of the Plan’s spatial and growth strategy and the Council’s intention to allocate key/strategic sites in LP2 which is running to a later timetable? Should the Plan include any site allocations?

Q46 Is the required ‘step change’ in the annual housing delivery rates realistically achievable and deliverable and what evidence is there to demonstrate this? How will the ‘step change’ be brought into effect?

Q47 Overall, is the scale and distribution of proposed growth positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan with regards to deliverability?

Q48 Overall, will the spatial and growth strategy be effective in achieving the Plan’s vision and objectives for the Borough and, if so, how? Is the overall scale and distribution of proposed growth appropriate and justified, including with regards to deliverability, the effect on Habitats Sites and air quality, and general consistency with the London Plan?

Q49 In terms of this issue, are any main modifications necessary for soundness?