**Waltham Forest Local Plan LP1**

**Examination Hearing Day 4 – Matter 5**

Tuesday 22 March 2022 starting at 09.30am

**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.
* The Matters, Issues and Questions are attached for ease of reference. 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.
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1. **Inspectors’ Welcome and Introductions**
2. **Matter 4: Employment and the Vitality and Viability of Centres**

**Key Documents**

Employment Land Study (2019) (EB6.1)

Employment Land Audit (April 2021) (EB6.0)

Retail and Town Centres Study (2019) (EB6.1)

Schedule of Proposed Modifications (LPE5)

**Issue 1 - Whether the assessment of the need for employment and the employment floorspace requirement is soundly based and whether the Plan sets out a positively prepared strategy for the economy**

*Key Areas for Discussion:*

* The sectors for growth and skills (Questions 78 & 79)
* How the need for employment land has been arrived at – loss to other uses and vacancy rates (Question 80)
* Employment land designations and proposed main modifications – Strategic Industrial Land, Locally Significant Industrial Sites and Borough Employment Areas (Question 82)
* Provision of land for distribution uses and policy requirements (Questions 81 & 83)

**Issue 2 - Whether the Plan is positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan in relation to other Borough wide policies for the local economy**

*Key Areas for Discussion:*

* Non designated employment land (Question 87)
* Masterplan approach (Questions 88 & 89)
* Co location (Questions 90 & 91)
* Affordable workspace (Question 92)
* Railway arches (Question 93)
* Blackhorse Lane Creative Enterprise Zone (Question 94)
* Overall approach to the economy and main modifications

**Issue 3 - Whether the Plan will contribute to the vitality and viability of Walthamstow town centre, the District Centres, Neighbourhood Centres and the Local Retail Parades**

*Key Areas for Discussion:*

* Designation of centres (Questions 97 & 98)
* Threshold for impact assessments (Question 99)
* The implications of changes to the Use Classes Order and General Permitted Development Order (Question 100)
* Primary Shopping Areas (Question 101)
* Evening and night time economy (Question 102)
* Overall approach to the vitality and viability of centres and main modifications
1. **Close**

**MATTERS ISSUES AND QUESTIONS**

**MATTER 4: EMPLOYMENT AND THE VITALITY AND VIABILITY OF CENTRES**

Context - The Plan does not identify additional sites for employment, additional floorspace is expected to be delivered through intensification and consolidation of existing employment areas.

Note - On 1 September 2020, the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 (UCO 2020) came into force. The Regulations create some new use classes, including Class E - Commercial, business and service uses.

**Issue 1 - Whether the assessment of the need for employment and the employment floorspace requirement is soundly based and whether the Plan sets out a positively prepared strategy for the economy**

Q78 Which employment sectors are forecast to generate the additional 8,100 jobs set out in the Greater London Authority forecast and does this reflect the Borough’s circumstances in terms of historical rates of jobs growth and the sectors envisaged for growth?

Q79 Would the jobs created be likely to meet the requirements of the Borough’s working population? Are there any identified skills shortages and how would these be addressed?

Q80 How has the need for employment been translated into the floorspace requirement of 52,000 square metres set out in Policies 2 and 25? Is the approach in relation to the following factors justified:

1. No allowance for vacancies, loss of employment land or contingencies
2. Assumptions for job densities, including any implications of the Use Classes Order as amended in 2020 and 2021 Class E
3. Gross developable area to net floorspace assumptions.

Q81 Is the sensitivity 3 scenario set out in the Employment Land Study (2019) [EB6.1] realistic in terms of the likely future demand for distribution floorspace? Can additional Class B8 (storage and distribution) floorspace be delivered effectively through intensification of and co-location on existing employment sites?

Q82 Are the Strategic Industrial Locations (SIL), Locally Significant Industrial Sites (LSIS) and Borough Employment Areas (BEA) shown on Figure 9.1 and the visions set out in Appendix 2 of the Plan justified and in general conformity with the London Plan? What are the implications of allowing offices (Class E (G)(i)) on BEA? Are any main modifications necessary for soundness?

Q83 Is Policy 25 justified in directing distribution uses to locations within good proximity of the strategic road network? Should the policy also include reference to co-location?

Q84 Overall, are Policies 2 and 25 positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan?

Q85 Are any main modifications necessary for soundness?

**Issue 2 – Whether the Plan is positively prepared, justified, effective, consistent with national policy, and in general conformity with the London Plan, in relation to other Borough-wide policies for the local economy (Policies 26 – 35 and 38)**

*Policy 26 – Safeguarding and Managing Strategic Industrial Land*

Q86 Is Policy 26 in general conformity with the London Plan in relation to the types of uses that will be supported on Strategic Industrial Land?

*Policy 29 – Approach to Non-Designated Employment Land*

Q87 Is Policy 29 justified including the 12-month marketing requirement in criterion D and are any main modifications necessary for general conformity with the London Plan and to address soundness issues?

*Policy 30 – Industrial Masterplan Approach*

Q88 Should Policy 30 set out a specific requirement for a masterplan as part of proposals for Borough Employment Areas/Strategic Industrial Land/Locally Significant Industrial Sites? Is it sufficiently clear what is meant by the reference to employment floorspace in part B of the policy?

Q89 What is the role of the Industrial Intensification Supplementary Planning Document in providing more detail of the implementation of the Plan’s employment policies?

*Policy 31 – Co-location Design Principles*

Q90 Is Policy 31 positively prepared and should it include reference to food and drink uses?

Q91 What effect, if any, would permitted development rights for the change of use within Class E have on the Plan’s strategy to intensify and consolidate employment development on existing sites?

Q92 What evidence justifies the threshold in Policy 33 of 1,000m2 for the delivery of affordable workspaces as part of new employment development?

*Policy 35 – Railway Arches*

Q93 Is Policy 35 positively prepared and justified in relation to the uses that will be supported in railway arches?

1. Is further clarity required on arches that are located within Borough Employment Areas/Strategic Industrial Land/Locally Significant Industrial Sites?

1. Is the reference to their role in providing ‘affordable’ locations for employment activities in paragraph 9.51 justified?

*Policy 38 – Blackhorse Lane Creative Enterprise Zone*

Q94 Is the policy justified and how would it be implemented in practice?

1. Should the policy include flexibility for consideration of development viability?
2. Should criterion C include creative workspaces?

Q95 Overall, is the Plan positively prepared, justified, effective, consistent with national policy, and in general conformity with the London Plan in relation to other Borough-wide policies for the local economy?

Q96 Are any main modifications necessary for soundness?

**Issue 3 – Whether the Plan will contribute to the vitality and viability of Walthamstow town centre, the District Centres, Neighbourhood Centres, and the Local Retail Parades (Policies 39 – 47)**

*Policy 39 – Hierarchy of Centres*

Q97 What evidence justifies the designations of the town, district and neighbourhood centres and the local retail parades in Policy 39?

Q98 Is Policy 39 in general conformity with the London Plan in restricting uses in District Centres to those that will complement Walthamstow Town Centre, having regard to connections between those centres?

*Policy 40 – New Retail, Office and Leisure Developments*

Q99 Is the 200sqm threshold for impact assessments in Policy 40 based on robust evidence? How would the need for a ‘broad brush’ statement of impact be defined?

Q100 What implications, if any, does the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 (the Regulations), SI 2020/757 and changes to the General Permitted Development Order have for the Article 4 directions in place?

*Policy 42 – Managing Changes of Use in Primary Shopping Areas*

Q101 Is it clear what is meant by ‘other uses’ and would they be permitted in the primary shopping area as well as within the town centre boundary?

*Policy 46 – Evening and Night-time Economy Uses*

Q102 Does Policy 46 set out a robust approach to dealing with proposals for evening and night-time uses? How would potential conflicts with adjoining uses be addressed, for example residential?

Q103 Overall, does the Plan set out a positively prepared, justified, and effective strategy for the vitality and viability of the Borough’s centres and local retail parades?

Q104 Are any main modifications necessary for soundness?