



**BNP PARIBAS
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Written Statement Responding to Inspector's Questions

Matter 2: Vision, Strategic Objectives, the Spatial and Growth Strategy

Examination of the Waltham Forest Local Plan Part 1

Prepared on behalf of LocatED

Respondent I.D: 1219917

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Matter 2: Vision, Strategic Objectives, Sustainable Development and the Scale of Growth

- 1.1. This Statement provides LocatED's response to the Inspector's Questions relating to the approach to strategy for growth set out in the Draft Waltham Forest Local Plan Part 1 (LPP1).
- 1.2. LocatED is a government-owned property company with the responsibility for buying and developing sites in England to create new school places for thousands of children. This response relates to the Former Water Depot at Lea Bridge Road site. The 5.6 hectare site is located on the southern boundary of the Lea Bridge Road close to Lea Bridge Station (450m). Its south-western boundary is the River Lea, which also forms the borough boundary. The site comprises previously developed land; it presently features existing industrial buildings and is effectively entirely covered in hardstanding.
- 1.3. This statement should be read in conjunction with LocatED's response to the Waltham Forest New Local Plan Part 1 Regulation 18 Consultation and Call for Sites Consultation (September 2019), and Regulation 19 Consultation (December 2020). We have also provided responses to the Waltham Forest Part 2 Regulation 18 Consultation in December 2020 and Regulation 19 Consultation in January 2022. Indicative proposals were put forward to the Council to demonstrate that a scheme at the site could deliver a large number of new homes (minimum 200, with potential for significant uplift), including affordable housing, which would contribute to the Council's housing requirement. Alternatively, commercial uses could also be appropriate. Our previous responses have demonstrated that proposals for the redevelopment could be brought forward which respond sensitively to the Metropolitan Open Land ('MOL') designation. Our responses have shown that, in the context of the existing site characteristics, a plan-led redevelopment at the site could enable significant social and environmental benefits, as well as contributing to meeting housing and/or employment floorspace requirements.
- 1.4. In this context, LocatED supports the Council's overall strategy of designating Strategic Locations as locations where growth will be focussed in the Borough, and specific Site Opportunity Locations, which are intended to support the key growth aspirations of the Plan. However, we raise concern with the Council's strategy in respect of identifying Site Opportunity Locations at the LPP1 stage, and significantly its approach to identifying these. It is LocatED's opinion that the Former Thames Water site should be considered as a Site Opportunity Location.

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).

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?*

- 1.5. Policy 4, in combination with other policies, directs the majority of new development to places with services and good accessibility, including at Site Opportunity Locations. Figure 4.1 identifies a series of Strategic Locations and Site Opportunity Locations throughout the borough – these often cover the same land.
- 1.6. The supporting text at paragraph 4.21 states (of the 17 Strategic Locations) that *'These are areas where substantial growth is expected to occur on larger sites or clusters of smaller sites to deliver the significant growth in housing, employment and infrastructure provision.'*
- 1.7. Paragraph 5.8 indicates that *'Growth and development will be directed to these Strategic Locations as they are sustainable locations for development with access to facilities including, shops, social and community infrastructure, open space and parks and public transport.'*
- 1.8. Paragraph 8.4 also notes that *'...Strategic Locations across the borough have significant capacity for new homes by making effective use of land, intensification and increased density.'*
- 1.9. Noting the above, it is considered that the identification of Strategic Locations as referred to in Policy 4 is in general conformity with the London Plan Policy SD10, which seeks to identify strategic and local regeneration. The designation of the Strategic Locations within Policy 4 (and Figure 4.1) represents a logical strategy for ensuring Good Growth as per Policy 6.
- 1.10. LocatED also supports the inclusion of the Former Thames Water site within the Lea Bridge and Church Road Strategic Location. This by definition recognises the fact that the site is in a sustainable location for development, and can contribute to the boroughs development needs.
- 1.11. It is highlighted that immediately to the west of the Former Thames Water site, within the London Borough of Hackney, is a Strategic Area for Regeneration. Strategic Areas for Regeneration are identified in Figure 2.19 of the London Plan (relating to Policy SD10). The high-level map at Figure 2.19 is based on National Statistics Data to demonstrate the 20% most deprived LSOAs in each Borough. Therefore, there is logic in the proposed extent of the Lea Bridge and Church Road Strategic Location, linking regeneration from the east in Waltham Forest and west in Hackney.

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

- 1.12. Firstly, it is assumed that the 'Site Opportunity Areas' indicated in the question relates to 'Site Opportunity Locations'.
- 1.13. There is very little detail in the Draft LPP1 in relation to the Site Opportunity Locations. Paragraph 4.25 states that these represent indicative locations from which sites would be selected to support the key growth aspirations of the Plan, and that further guidance on the Site Opportunity Areas will be included in the Site Allocations DPD (Local Plan Part 2).
- 1.14. We do not dispute that the Site Opportunity Locations identified in the Plan could offer significant potential for development to help meet the Council's development needs. However, in its current form, it is considered that the Plan is not justified because the LPP1 is unclear as

to how the Site Opportunity Locations have been identified. It refers to additional detail in respect of the identification of these areas being set out in the Local Plan Part 2 ('LPP2'), however there are two significant issues with this.

- 1.15. Firstly, it is clear that the LPP1 is intended to be the document which sets out the strategic policies for growth in the borough. The LPP2 should be the more detailed, finer grain development plan document which allows the overall strategy to be delivered within the plan period. Therefore, it is perverse for the LPP1 to include strategic policies which derive from the LPP2 (which has not been subject to Examination in Public).
- 1.16. Secondly, there appears to be no elaboration within the Draft LPP2 Site Allocations (Regulation 19) Consultation draft, or the evidence base supporting that document, as to how these Site Opportunity Locations have been identified.
- 1.17. For the above reasons, we question whether the LPP1 is the correct and appropriate development plan document to be identifying Site Opportunity Locations. If, however, it is considered that it is, it is important that the identification of such areas be justified through a robust evidence base.
- 1.18. In our view, the Former Thames Water site would contribute to achieving Good Growth (Policy 6) by making efficient use of previously developed land, potentially through mixed use development (Policy 6 part A), and make a significant contribution to the housing and/or employment needs in the Lea Bridge and Church Road Strategic Location over the plan period.
- 1.19. Therefore, if Site Opportunity Locations are to be identified within the Local Plan Part 1, the Former Thames Water site should be considered for such a designation. Our previous response to the Local Plan Part 1 Regulation 19 Consultation provides additional detail on the benefits of such an identification.
- 1.20. Our previous consultation responses highlight that the Council itself in the Lea Bridge and Leyton Vision (2017) document identified the site as a 'possible regeneration opportunity' (page 28). Page 32 also shows an indicative form of development focussed around the western part of the site, which is similar in approach and scale to the AI Architecture proposals submitted as part of our Regulation 18 and 19 consultation responses. This demonstrates the Council itself recognises the site as a potential regeneration site with the potential to contribute to housing and/or employment provision.

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

- i. 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?*
- ii. Has the Council considered longer-term development needs and should any areas of safeguarded land be identified?*

- 1.21. The Waltham Forest Focussed Green Belt and Metropolitan Open Land Assessment 2019 (LUC) reviewed the alignment of the Borough's existing Green Belt and MOL boundaries. The

Councils response (LPE6) to the Preliminary Matters letter (LPE0) confirms that, *“where the existing boundaries do not following readily recognisable and permanent physical features, recommendations for minor boundary adjustments are made in line with paragraph 139 of the NPPF.”* The Draft Plan acknowledges the opportunity to develop on previously developed land (‘PDL’). Some brownfield sites in the borough (such as the Former Thames Water site) have an MOL designation.

- 1.22. We agree with the Council that it is not necessary to propose any changes to the Green Belt or MOL boundaries. However, it is highlighted that the Former Thames Water site represents an opportunity to provide additional areas of public open space within MOL, and enhanced linkages through the Lea Valley Park as part of a comprehensive, plan-led redevelopment. Specifically identifying the site for development (as a Site Opportunity Location) would ensure that such benefits are enshrined within planning policy document.
- 1.23. For clarity, we do not suggest that the site is removed from the MOL designation.