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**Department: Planning**

Your reference:  
Our reference: LDF31/LDD17/LP05/HA01  
Date: 12 January 2022

Dear Andrea

**Re: Examination of the London Borough of Waltham Forest Local Plan (LP1).  
Inspectors' Matters, issues and questions. Matter 4 – Employment and the vitality and  
viability of centres. Matter 6 – Built Environment, Heritage and Design**

Thank you for inviting written statements in advance of the London Borough of Waltham Forest Local Plan (LBWF) Examination in Public hearing sessions. LBWF has actively engaged with officers at the Greater London Authority (GLA) to discuss concerns raised in the Mayor's Regulation 19 letter of conformity dated 14 December 2020, Regulation 18 consultation response issued 27 September 2019 and as a result of changes made to Policy D9 in the London Plan 2021 prior to its final publication in March 2021.

As you will be aware, development plan documents prepared by London boroughs must be in general conformity with the spatial development strategy (SDS) for London (referred to as the London Plan) in accordance with S.24 of the Planning and Compulsory Purchase Act 2004 (as amended). The London Plan 2021 was formally published on the 2 March 2021, and now forms part of LBWF's Development Plan and contains the most up-to-date policies.

On 25 July 2021 LBWF requested GLA officers to consider whether it was necessary for amendments to be made to the LBWF draft Plan following the formal publication of the London Plan 2021 (LP2021) to ensure that it is in general conformity. Since that request, GLA and LBWF officers have met on several occasions to resolve issues raised in the Mayor's response to the Regulation 19 Local Plan consultation and as a result of changes to Policy D9 of the London Plan 2021. In response to the Inspectors' Matters, Issues and Questions, specifically Q22, the Mayor considers that as currently written the draft Plan (LP1) is not in general conformity with the LP2021 due to the proposed approaches to the management of the borough's industrial land and its approach to tall buildings.

While the Mayor did not raise general conformity concerns over the industrial land policies of LP1 at Regulation 19 stage in December 2020, his concerns have since increased due to:

- the proposed Modification SOPC055<sup>1</sup> which gives the masterplan approach an inappropriate level of flexibility that could facilitate the erosion of industrial floorspace
- the Regulation 19 Site Allocations (LP2) proposing the introduction of non-industrial uses in several Strategic Industrial Locations (SIL)
- some of the detail of co-location envisaged at the Blackhorse Lane SIL, without a hard line between the remaining SIL and the area to be managed for release for co-location
- the lack of detail currently available about the emerging Industrial Intensification Supplementary Planning Document (SPD), which is meant to provide a more detailed strategy as well as guidance about the borough's approach to industrial intensification.

Overall, therefore, at this point in time, this means that there is insufficient assurance about the approach to industrial land and the delivery of the stated aims of intensification.

### **Mayor of London Statement**

The Mayor has welcomed continued collaborative working with LBWF officers to agree a Statement of Common Ground (SCG). Indeed, amendments have been negotiated at an officer level which could help resolve many of the issues relating to tall buildings and other matters. As yet, these amendments have not been agreed formally through a SCG between the Mayor and the LBWF but GLA officers are happy to continue working with LBWF to agree amendments to bring the draft Plan into general conformity with the London Plan through a SCG.

The Mayor notes the question raised by the Inspectors in the Preliminary Matters which set out:

**Paragraph 23 of the Inspectors Preliminary Matters:** *Are there any implications for the content of the plan or the evidence base arising from the adoption of the new London Plan, other than those indicated in the schedule of proposed changes (KD2), noting that the submitted plan (KD1) refers to the then-emerging Intend to Publish version of the new London Plan? Is there a need for any further proposed main modifications in this regard?*

The Mayor disagrees with the response provided by LBWF to that question and which is included in LPE7 Matter 7 General Matters (pages 23-25)<sup>2</sup>. The reason for that disagreement lies primarily in regard to the London Plan modifications made to Policy D9 prior to its final publication.

The Mayor received further directions in relation to the Intend to Publish London Plan from the Secretary of State on 10 December 2020. This was only four days prior to the end of the consultation on LBWF's Regulation 19 version Local Plan and for that reason the directions were not taken into account in the Mayor's response.

In light of this, the Mayor considers that there is a need for further proposed modifications in relation to tall buildings in order to bring the draft Local Plan into general conformity with the London Plan. This is discussed in detail in response to questions Q132 and Q133 within Matter 6 later in this statement.

The Mayor's general conformity concerns related to industrial land are set out below within the responses to relevant questions for Matter 4.

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<sup>1</sup> LPE5: Matter 4 Modifications

<sup>2</sup> [https://www.walthamforest.gov.uk/sites/default/files/2021-10/Matter\\_6\\_General\\_Matters.pdf](https://www.walthamforest.gov.uk/sites/default/files/2021-10/Matter_6_General_Matters.pdf)

**Officer Level agreement on further proposed modifications**

The Mayor would like the Inspectors to be aware that GLA and LBWF officers have been working continuously over several months and have agreed modifications at an officer level that had been intended for inclusion within a SCG. The Mayor would welcome these proposed changes, and GLA officers will continue to work with LBWF officers to try to confirm these modifications in a SCG ahead of the examination hearings. The modifications which have been agreed at officer level are set out in the below table.

GLA Comment	Council’s Comment	Proposed Change – subject to Inspectors’ consideration
<p>Policy 12: Explicit recognition of London Plan housing target and making transparent the evidence how to exceed that in line with other London Plan policies such as on industrial land</p>	<p>Proposed addition to the Policy text recognising that Policy H1 requires that Boroughs must include these targets in their Development Plan Documents.</p> <p>(In 15 years from 2020-2035 this equals 27,056 homes)</p>	<p>Policy 12 to read as follows:</p> <p>Opportunities for housing growth in Waltham Forest will be maximised to deliver <u>on and exceed the 10-year minimum target set out in the London Plan, of 1264 per annum (2019/20 -2028/29) and meet housing need in Waltham Forest as far as possible by aiming to deliver an average of 1770 per annum across the plan period.</u></p> <p>Paragraph 8.7 – to read as follows:  <u>The housing requirement figure is 1770 new homes per annum which meets local housing need as assessed by the Standard Method.</u> <del>Following the Standard Method for assessing local housing need, the average annual housing requirement figure is 1770 new homes</del></p>
<p>Policy 95: Identification of safeguarded waste site at Argall Avenue in the Local Plan following adoption of North London Waste Plan</p>	<p>This is accepted and noted for inclusion on the Policies Map.</p>	<p>Policies Map to be amended accordingly.</p>
<p>Policy 19: The small sites target of 359 new homes set out in the London Plan should be mentioned in policy or supporting text, and not only in the</p>	<p>It is proposed to include a reference in the supporting text under Policy 19 – to refer to Small Sites and the London Plan target.</p>	<p>Revised text as follows:</p> <p>Paragraph 8.24  Small sites will play an important part in meeting the borough’s housing needs and target. Increasing the rate of housing delivery from small housing sites is a priority. Small sites are defined as those below 0.25ha. <u>The London Plan sets a 10-year minimum target for net housing completions on small sites. For Waltham Forest this is an annualised target of 359 net new homes.</u>  <u>8.25</u> The delivery of small sites will be achieved through incremental intensification of existing residential areas</p>

GLA Comment	Council's Comment	Proposed Change – subject to Inspectors' consideration			
appendix on monitoring		and town centres, or in areas with adequate public transport accessibility, which is considered to be PTAL 3 to PTAL 6. Additional guidance in the form of Design Codes and SPDs may be produced to assist with the accelerated delivery of such sites.			
Policy 23: The pitch target for Gypsy & Traveller sites has been included in the supporting text, but it does not explicitly refer to a ten-year timeframe, and there is no reference to auditing of existing local authority sites	This is noted.	<p>Revised text as follows:</p> <p>Paragraph 8.31  There are two Gypsy and Traveller sites in the borough; one at Folly Lane and another at Hale Brinks North. A Gypsy and Travellers' Needs Assessment has been commissioned to understand the level of need in the Borough. The Gypsy and Travellers' Needs Assessment has identified a requirement for two additional pitches <u>in the next 10 years</u>, under the national definition in Planning Policy for Travellers Sites. The additional pitches are expected to be met by intensification of the existing sites.</p>			
Reasons for individual industrial designation boundary changes should be included in the local plan...	It is proposed to update Appendix 3 to itemise industrial designation boundary changes	Designations/proposals Change to change from 2012 Core Strategy policies map	<b><u>Change</u></b>	<b><u>Figure 3.x</u></b>	
		BEA9	<b><u>Removed to reflect completion of residential scheme</u></b>	<b><u>7</u></b>	
		BEA10	<b><u>Removed to reflect completion of residential scheme</u></b>	<b><u>7</u></b>	
		BEA7	<b><u>Amended to reflect completed non-industrial scheme</u></b>		
		...			

GLA Comment	Council's Comment	Proposed Change – subject to Inspectors' consideration
<p>Policy 79: As test for planning applications on Green Belt or MOL this should refer to 'very special circumstances' and not 'exceptional circumstances', which is used to justify changes through the local plan.</p>	<p>Existing policy wording at 79B reads:            "B. In the event that development proposals are allowed in exceptional circumstances in Green Belt or MOL within the meaning of national policy and the London Plan"</p> <p>Exceptional circumstances in this case is qualified by the reference to national policy and the London Plan. The point however is taken and noted for modification once circumstances permit.</p>	<p>Revised text as follows:   <u>"B. In the event that development proposals are allowed in very special <del>exceptional</del> circumstances in Green Belt or MOL within the meaning of national policy and the London Plan"</u></p>

## **Mayor's response to Matter 4**

### **Issue 1:**

#### **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?**

The council needs to ensure that future demand scenarios are underpinned by robust local evidence. The first sensitivity test within the Employment Land Study claims that the borough would, despite its classification as Outer London within the London Plan, not reflect the distribution characteristics of Outer London (i.e. be different from those for example in neighbouring Enfield) resulting in higher employment densities<sup>3</sup> and lower floorspace demand. The council may wish to consider how to evidence these assumptions further. In any case, regular monitoring and review of these demand figures is necessary, given the significant current economic uncertainties.

The potential introduction of non-industrial uses in SIL that is also reflected in LP2 and emerging masterplans the council is preparing, risks eroding the provision of land for industry and distribution, and therefore the ability to meet the borough's corresponding floorspace need. There needs to be confidence that the overall approach, as well as in specific locations, is robust and deliverable and sufficiently mitigates the potential risks.

Significant quantities of theoretical industrial capacity have been identified through desk-based intensification proposals<sup>4</sup>, but there is considerable uncertainty over their deliverability/viability, which could vary significantly depending e.g. on plot size/shape, design requirements or fragmented landownership. The Industrial Intensification SPD is not yet available as evidence to facilitate and support delivery of all types including heavier industrial uses and distribution.

There is also no evidence of an area-specific design-led approach and associated viability, which would set out where industrial capacity could be viable and come forward.

Replacement of industrial with non-industrial uses has not only a quantitative impact in terms of floorspace reduction, it also has a wider qualitative impact in changing the character of an area.

A wider and related concern is that the borough plans to significantly exceed its London Plan housing target (by 500 homes/year). While this is welcome in principle, it should not rely on undermining other London Plan policy requirements.

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<sup>3</sup> EB6.1: Employment Land Study, 2019, page 18

<sup>4</sup> LPE8: Waltham Forest Employment Land Audit, April 2021

**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?**

These Visions have been removed through the Modification SOPC048<sup>5</sup>. Further detail is proposed to be set out in the forthcoming Industrial Intensification SPD, although that is not available as evidence for this examination<sup>6</sup>.

Office is acceptable on BEA following the necessary Modification SOPC042/43<sup>7</sup>, which provide a clear distinction from LSIS, with only a few BEA locations remaining. Given the nature of the BEA uses, it is important that, where necessary, they are supported by improvements to walking, cycling and public transport connectivity and capacity.

**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?**

Yes, directing distribution uses to locations within good proximity of the strategic road network is justified. London Plan Policy E4 (D) 1 includes a similar prioritisation for the industrial capacity. However, to support sustainable means of distribution, smaller local sites will also be required for transfer to and storage of cargo bikes and other sustainable forms of distribution.

The policy should not refer to co-location as employment typologies rather than consolidation mechanisms. It is important that the policy reflects the strategic need to accommodate all required employment and industrial uses to ensure a sustainable pattern of development.

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

The current draft policy framework related to industrial land is not in general conformity with the industrial land policies of the London Plan.

The borough needs to provide a more robust overall approach to industrial land to be in general conformity and, in particular, more confidence over sufficient supply of industrial land/premises to meet current and future demand, as set out in London Plan Policy E4(A).

The Mayor understands that the borough is preparing several masterplans that, as set out in London Plan policy E7, could potentially consolidate, intensify and provide additional industrial capacity to enable the introduction of non-industrial uses in SIL. Until these masterplans have been agreed by the GLA the Local Plan should not include the potential to introduce non-industrial uses in SIL.

The proposed introduction of non-industrial uses without an agreed managed approach to SIL release leads to a piecemeal erosion of SIL and creates hope value as well as uncertainty over the ability to meet the borough's full range of industrial need and is therefore not in line with

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<sup>5</sup> LPE5: Matter 4 Modifications

<sup>6</sup> See also response to Q89 below

<sup>7</sup> LPE5: Matter 4 Modifications

the London Plan. Policy E7(B) states that in LSIS (but not in SIL) there is scope for co-locating industrial uses with residential and that other uses may be considered.

A coherent plan-led approach to industrial intensification and consolidation is required across the borough to ensure demand for all types of industrial use is met and eroded SIL capacity replaced. Resulting SIL boundary changes can only be made through the local plan. London Plan Policy E5(B)4 states that SIL release must be adopted as policy in a Development Plan.

For context, it should also be noted that LP2 includes several Site Allocations where co-location of non-industrial uses is proposed within LSIS. It is important that in every case it should be demonstrated that this is considered as part of a plan-led or masterplan process and meet the requirements set out in London Plan policy E7(D).

### **Q85 Are any main modifications necessary for soundness?**

Policy 25 should set out where spatially within the borough the majority of the additional employment floorspace (in particular B8) is proposed to be delivered. This must be underpinned by

- Evidence of the viability and deliverability of industrial intensification set out in the council's Industrial Land Audit that are based on credible assumptions
- Identification of specific actions to facilitate delivery of industrial intensification in the most suitable specific locations
- A commitment that key actions from the above will be included in the emerging Industrial Intensification SPD<sup>8</sup>
- A clear monitoring framework for the delivery, phasing and review of the additional industrial floorspace requirements.

The borough's relevant planning documents cannot be considered and assessed in isolation. Mitigation is also required through LP2 to provide a coherent and consistent planning framework: Non-industrial uses should not be introduced in any SIL. For Blackhorse Lane within the draft Site Allocations (LP2), the Mayor seeks a clear boundary between the area that is to remain SIL and the area that is to be managed for release to co-location.

The Mayor recommends that the above mitigation measures are included in a Statement of Common Ground with the council.

## **Issue 2**

### **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?**

Within Policy 26 a reference to London Plan Policy E4(A) would provide a more comprehensive range of use types and better reflect the London Plan.

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<sup>8</sup> See also response to Q89 below

## **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?**

Within criterion D of Policy 29, including a 12-month marketing requirement for employment use retention, a reference to para 6.7.5 of the London Plan would provide a more comprehensive and accurate overview of relevant requirements specifically related to non-designated industrial land that better reflects the London Plan.

## **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?**

Some requirements are set out in Policy 30, and the Mayor welcomes that the masterplans must be agreed by the Mayor<sup>9</sup>. However, he is concerned that this policy facilitates a piecemeal approach and inappropriate levels of flexibility that could undermine the borough's industrial, and specifically SIL designations. Policy 30 should include a clear indication that intensification and consolidation of industrial land through masterplans should supplement, and not replace, strategic planning to meet requirements for all industrial types to be set out in the local plan.

Modification SOPC055<sup>10</sup> (new para 9.55 on policy implementation) is unclear and vaguely refers to undefined 'viability or deliverability' considerations as well as 'exceptional circumstances', which leave significant room for interpretation and gives the masterplan approach an inappropriate level of flexibility that could facilitate the erosion of industrial floorspace. It is explained that 'an update on the policy position will be clarified on site-specific basis and applied through the Site Allocations Document (LP2)'. This implies that site-specific schemes would inform the LP2 policies rather than the other way around (i.e. policy informing development proposals). This modification should be deleted.

In response to the second question, 'employment' floorspace should be replaced with 'industrial' floorspace.

### **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?**

The Supplementary Planning Document (SPD) is expected to provide more detail to underpin the robustness of the council's approach to meeting its industrial demand, as this is absent from LP1 and LP2.

Policy 25 sets out that 'employment growth in Waltham Forest will be maximised to ensure there is sufficient capacity to deliver a minimum of 52,000sqm of additional employment floorspace across the borough over the plan period' and paragraph 9.20 confirms that a

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<sup>9</sup> Part F of the policy

<sup>10</sup> LPE5: Matter 4 Modifications

‘comprehensive approach is required to deliver intensification and consolidation which considers both borough wide employment requirements and land capacity but also each designated location.’ Para 9.21 then indicates that ‘detail on how industrial intensification and consolidation can be delivered in each of the borough’s industrial locations will be set out in the Industrial Intensification Supplementary Planning Document.’

However, a consultation draft of this SPD is, according to borough officers, only expected to be published after the local elections in May 2022 with completion after adoption of the new Local Plan later in 2022. This is too late to serve as evidence to support the robustness of the council’s approach to industrial land at this examination. It should also be noted that the preparation of the SPD will not need to undergo the close scrutiny that LP1 is subject to.

The only evidence currently available is the council’s Employment Land Audit, which indicates significant potential for industrial intensification. However, the report acknowledges uncertainty, for example, over unproven dense typologies<sup>11</sup>, limits to market absorption for intensified typologies, as well as transport network constraints. It should also be noted that all industrial functions, including the need for heavier industry and distribution must be accommodated. There is also no information available on the viability of the proposed levels of intensification. Therefore, this can only be afforded limited weight when it comes to the justification of the consolidation of industrial land. This is important, as once industrial land, and in particular land suitable for heavier industrial uses and distribution, is released it is much more difficult to recover from other uses given its specific land-take requirements, in particular for stacked typologies, and potential impact on sensitive neighbouring uses.

### **Policy 38 – Blackhorse Lane Creative Enterprise Zone**

#### **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?**

The significance of all types of industrial uses and their role within the designated SIL should be recognised within this policy.

The scale of co-location in the Blackhorse Lane Masterplan should be reduced. The corresponding SIL boundary change should be reflected within the Site Allocation for Blackhorse Lane<sup>12</sup>.

#### **Q96 Are any main modifications necessary for soundness?**

Part D of Policy 38 addressing the Agent of Change principle should be strengthened to ensure that the significance of industrial uses and their key role within the designated SIL are recognised and protected.

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<sup>11</sup> LPE8: Waltham Forest Employment Land Audit, April 2021, pages 190-191

<sup>12</sup> London Plan policy E5(B)4 states that SIL release must be adopted as policy in a Development Plan.

## **Mayor's response to Matter 6**

### **Policy 57 – Taller and Tall Buildings**

**Q132 Is Policy 57 justified and how will it be implemented alongside Policy 56 in practice? Is the policy in general conformity with the London Plan? and**

**Q133 Should the policy be more specific in defining the locations in which taller and tall buildings will (or will not) be appropriate? Is it sufficiently flexible?**

Policy D9 of the London Plan 2021 is clear that borough development plans should define what is considered to be a tall building; that boroughs should determine where tall buildings are considered to be an appropriate form of development and that these locations and appropriate tall building heights are identified on maps.

Policy 57 of LBWF's draft Local Plan defines tall buildings as those which are substantially taller than their prevailing context, making a significant impact on the skyline of the borough. In order that the definition is consistent with Policy D9 of the LP2021 it must provide a numerical definition for tall buildings and this cannot be less than 6 storeys, or 18 metres, measured from the ground to the floor level of the uppermost storey. LBWF's proposed draft definition is not numerical and doesn't define a tall building in terms of height by either numbers of storeys or in metres from ground level and as such does not meet the explicit definition requirements of Policy D9A of the LP2021.

The building height ranges set out in Table 14.1 in Policy 57 do not correspond to the tall building definition in the LP2021 which makes it clear that they should not be less than 6 storeys, measured from the ground to the floor level of the uppermost storey. Additionally, in the absence of a borough-wide numerical definition of what constitutes a tall building, LBWF's proposed approach to tall buildings outside of those places identified as Transformation, Transition or Reinforcement areas is not clear.

LP2021 Policy D9B2 is clear that appropriate tall building heights should be identified on maps in development plans. The correct approach is further emphasised in paragraph 3.9.2 of the LP2021, stating that boroughs should determine the maximum building heights that could be acceptable in specific locations and identified on maps. Table 14.1 in LBWF's draft Plan goes some way in meeting these requirements, for example, setting out appropriate tall building height ranges in Transition areas. However, in Transformation areas tall buildings are considered to be 18 storeys or more, with no indication of what might be acceptable in terms of appropriate maximum building heights. As such, the approach is not considered to be consistent with the one set out in Policy D9 of the LP2021.

As a matter of guidance, the Mayor would advise LBWF to use a definition which is based on a measurement taken from the ground level to the very top of the building. Assuming a floor to ceiling height of 3m, this would result in an overall height of 21m. To be clear the Mayor would support a definition of 21m from ground level to the very top of the building. This clarity will help to avoid confusion in terms of determining planning applications and in providing guidance to prospective applicants.

Transformation, Transition and Reinforcement areas are not clearly defined in maps in the Local Plan, or in a draft Policies Map. However, it is noted that these areas are more clearly defined through LBWF's draft Site Allocations (LP2) document. As the draft Plan (LP1) is a separate document, these areas should be clearly set out in maps as part of the Local Plan (LP1) to be in line with the LP2021 and to make it easier for readers to learn where these areas are located.

A further requirement of Policy D9 of the LP2021 is that tall buildings should only be developed in those locations identified as suitable in development plans. Part B of Policy 57 in LBWF's draft Plan states that,

"In some limited circumstances however, subject to local character and context, and where an opportunity for Transition or Transformation is justified and agreed in accordance with the approach to intensification set out in Policy 8... Tall buildings may be considered appropriate. Such sites could include..."

This proposed approach is at odds with the one set out in LP2021 Policy D9.

The preparation of a Local Plan provides the opportunity for a number of stages of rigorous consultation and scrutiny and is subjected to an examination in public to ensure its validity. This 'exception' rule within the Local Plan would have the effect of weakening the significance of this process.

Planning practice guidance is clear that,

'To the extent that development plan policies are material to an application for planning permission the decision must be taken in accordance with the development plan unless there are material considerations that indicate otherwise'<sup>13</sup>

It is understood that there will sometimes be occasions where material considerations will allow for exceptions and in turn there will be instances where tall buildings may be considered acceptable outside of identified tall building locations. Building an 'exception' into LBWF's Policy 57 itself would only result in undermining the purpose of identifying suitable tall building locations and in turn Policy D9B3 of the LP2021. The exception is therefore considered to be unnecessary and detrimental to the effective implementation of Policy D9 and should therefore be removed.

For these reasons LBWF's proposed approach to tall buildings is such a significant divergence from Policy D9 that it is not considered to be in general conformity with the LP2021.

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<sup>13</sup> <https://www.gov.uk/guidance/determining-a-planning-application#how-decisions-on-applications> / Paragraph: 006 Reference ID: 21b-006-20190315

I hope this statement can inform the Examination of LBWF's Local Plan. If you have any questions in relation to this Statement, please contact Hassan Ahmed at [hassan.ahmed@london.gov.uk](mailto:hassan.ahmed@london.gov.uk).

Yours sincerely



Lucinda Turner

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Cc: Sem Moema, London Assembly Constituency Member  
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