



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

Response to the Inspectors’ Matters, Issues & Questions

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

January 2022

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?

The 'Golden Threads' represent the key principles that drive and bind the Plan. They are intended to focus attention on the principles which relate to overarching sustainable development objectives (economic, social and environmental) as set out under paragraph 8 of the NPPF. To convey this message, the Council considers it necessary for this information to sit in front of Chapter 3 (Vision and Strategic Objective). However, this information (Figure 3.1) could be moved elsewhere – to the beginning of Chapter 4, to avoid confusion with the vision and strategic objectives.

The Council considers the 6 Golden Threads are justified and add value to the Plan.

- *Golden Thread 1 - Increasing housing and affordable housing delivery creating liveable places.*

This reflects national policy embodied in the NPPF flowing from Government's policy objective to significantly boost the supply of homes of all tenures. It draws attention to this key issue the plan needs to address, which is also encouraged by the London Plan. In ensuring the delivery of new housing, the Council also recognises the important planning objective to create liveable places. This thread broadly relates to Strategic Objectives 1 & 9.

- *Golden Thread 2. Ensuring growth is sustainable and supported by infrastructure.*

This thread draws attention to the purpose of the planning system as stated in the NPPF – to contribute to the achievement of sustainable development. This thread also draws from the London Plan and broadly relates to Strategic Objectives 2, 4, 5, 7, 8,11,12,13 &14.

Golden Thread 3. Building on the unique strengths of the borough and carrying forward its cultural legacy.

Waltham Forest is an important cultural centre in London -the first ever Mayor of London's Borough of Culture in 2019. The Council considers the

Local Plan has an important role in promoting its cultural legacy. The London Plan seeks to promote culture. The Mayor of London's vision in this regard is for a city where access to great culture is built into the fabric of every part of London. This thread broadly relates to Strategic Objectives 2, 6 & 10.

Golden Thread 4. Promoting the economy to improve the life chances for all residents, students and workers.

This thread is derived from the economic and social objective under paragraph 8a and 8b of the NPPF. The London Plan also reflects this objective. This thread broadly relates to Strategic Objectives 2, 3 & 4.

Golden Thread 5. Protecting and enhancing the natural environment.

This thread is derived from the NPPF (paragraph 174) – that planning policies and decisions should contribute to and enhance the natural and local environment. Similarly, this planning objective is reflected in the London Plan. This thread broadly relates to Strategic Objectives 11, 12, 13, & 14.

Golden Thread 6. Ensuring land optimisation and driving investment.

The NPPF (paragraph 119) declares that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. This thread also stems from the London Plan good growth policies. In particular, this golden thread recognises the challenges facing the borough in accommodating growth within an already heavily built area and draws attention to the plan strategy to promote intensification.

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?

The Council considers that strategic objectives are soundly reflective of national and London Plan policy objectives, but with a local dimension addressing the borough's needs, aspirations, and the Council's priorities. The strategic objectives have been derived from the evidence base as set out in the Sustainability Appraisal (SA) Scoping Report. The SA objectives flow from the vision statement and is carried forward through the strategy and plan policies. To demonstrate this point, taking the 'Liveable Waltham Forest' strand from the vision statement for example (page 10 of the plan), are linked objectives relating to distinctive and thriving centres and accessible centres for urban living where most of local needs are met with 15-minutes' walk (Strategic Objective 4). Other linked objectives relate to the network of green spaces (Strategic Objective 11), improved life chances (Strategic Objective 3), improved health and well-being (Strategic Objective 7) and improved active and sustainable transport choices (Strategic Objective 8).

Plan policies have been drafted from the starting point of the strategic objectives. Thematic chapters of the Plan begin with a statement of the key strategic objectives applicable to that chapter.

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?

The Council notes the NPPF 2021 update regarding the "presumption in favour of sustainable development". Paragraph 11a requires plan-makers to "align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects".

Accordingly, the Council intends to amend the policy statement by including a new text after the 1st sentence of Paragraph 2 to read as follows:

"Developments will be expected to meet the objectively assessed development needs of the borough, align growth and infrastructure, improve the environment, and mitigate climate change (including by making effective use of land) and adapt to its effects".

Q28 Are any main modifications necessary for soundness?

As above.

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?

i. Has an appropriate methodology for assessing housing need and establishing the housing requirement been applied?

The housing needs of the borough have been thoroughly assessed through the evidence supporting The London Plan which has been examined, and through the Waltham Forest SHMA which provides a local assessment of housing need, and breaks down the size, type, and tenure requirements for new housing provision in line with paragraph 61 of the NPPF.

The London SHMA identifies a need for 66,000 additional homes per year for London for the period 2016 to 2041, and closely follows the methodology of the 2013 version which was endorsed at examination by the FALP Inspector. The London Plan Inspectors concluded that 'the findings were the best and most reliable ones for plan making in the London Plan to be based on'.

It does not follow the guidance in the PPG on Housing and economic needs assessments on assessing objectively assessed need. Instead, the SHMA makes use of the 2015-based GLA population projections with a 10 year period to assess migration (the central variant).

The main data source is the English Housing Survey (years 2012/13 - 2014/15) in addition to ONS house price statistics, MHCLG homelessness and social housing lettings, and CORE lettings data.

The model has three main elements, Household Growth, Affordability, and Backlog Need. Household Growth is based on the GLA's central variant population projection (2015-based), and estimates a gross requirement (unadjusted for affordability or backlog need) of 4.79 million homes in 2041. With 3.40 million households in 2016, growth of 55,500 households a year is required to reach 4.79 million in 2041.

Three types of Backlog need are identified; net backlog, tenure backlog, and size backlog. The identified (net) backlog of 209,000 households in need of additional homes is assumed to be cleared over 25 years. The main types of household considered to comprise backlog (net) need are concealed households, households without basic facilities, and homeless in non-self-contained temporary accommodation.

Tenure backlog is comprised of households who need housing of a different tenure type. These are homeless in private sector leased accommodation, and private sector households who need to move to affordable housing due to overcrowding, disability or arrears. Tenure backlog is not a component of net backlog, as each tenure move is assumed to free up a dwelling. There are approximately 147,000 (net) who need affordable housing.

Size backlog is comprised of overcrowded households in affordable housing. There are 97,000 overcrowded households in affordable housing needing to move to an affordable home of a more suitable size. Overall, backlog clearance increases the total net annualised requirement (~9,000 per year) and increases the requirement for affordable housing (particularly low-cost rent).]

After adjusting for vacancy and second homes, the final annualised requirement for new homes is 65,878 per year to 2041. The London Plan does not provide an apportionment of the total need for London as a single housing market area to each borough.

The London SHMA (2017) provides an assessment of housing need for London based on a net stock model for the whole city but doesn't disaggregate this need to a borough-level. The Waltham Forest SHMA reviewed the geographies used in previous local SHMA exercises in North East London to make up the Housing Market Area for analysis and found that no single, unique and obvious grouping could be identified from the available data, instead 'a complex picture of linkages... with relatively low levels of self-containment' .

Rather than impose arbitrary boundaries, the Waltham Forest SHMA therefore proceeded with analysis using the Borough boundary as the effective HMA.

The Waltham Forest SHMA adopts the GLA 2015-based population projection (central variant) as the best estimate of household growth, as a mid-point between longer-term trends in household formation and the shorter-term trends of the post 2007 period.

An Objectively Assessed Need (OAN) for the borough is calculated at 1,810 dwellings per annum over the period 2014-2039, including provision for vacant and second homes in the additional stock, and clearing the backlog of 5680 households over a 20-year period.

A housing requirement for the borough has been established through a full and detailed assessment of the capacity of the borough undertaken in line with guidance.

The borough's housing requirement is informed by the GLA Strategic Housing Land Availability Assessment (SHLAA) and supplementary evidence in the form of the borough's Growth Capacity Study, in addition to further design-led testing to establish capacity in line with London Plan Policy D3 - Optimising site capacity through the design-led approach.

The adoption of the London Plan in March 2021 established a new housing requirement for Waltham Forest. The Council considers that in developing this plan, its housing requirement is initially to be set at the level identified in Table 4.2 of the London Plan, 12,640 net additional dwellings over the period 2019/20 – 2028/29. However, as far as possible, the Council seeks to provide as much capacity as possible to meet local needs. The London Plan Inspectors identified the fact that the housing targets provided for by the London Plan are so far below the assessed need as a point of major concern, as did the Secretary of State in his letter of 13 March, 2020.

Direction 8 of the Secretary of State's Letter modified 0.0.21 of the London Plan, so as to not discourage London Borough's that may be able to exceed their housing target [from the London Plan]. As the revised text reads:

'Therefore, boroughs do not need to revisit these figures as part of their Local Plan development unless they have additional evidence that suggests they can achieve delivery of housing above these figures whilst remaining in line with the strategic policies established in this Plan.'

As the evidence supporting this Plan does indicate that a higher level of delivery is achievable whilst remaining in line with the strategic policies of the London Plan, it holds that a requirement based on that evidence

which has been produced in a manner consistent with guidance should be considered an appropriate basis for setting the plan's housing requirement.

ii. Are the housing and employment requirements/targets positively prepared?

To be positively prepared, housing and employment requirements should as a minimum seek to meet objectively assessed needs for housing and for economic needs.

For housing the requirement seeks to meet as far as possible the identified need. As set out above, the Plan is seeking to meet a level of need above the minimum target established by the London Plan in order to close the gap between need and supply in the borough as far as possible.

Regarding employment, the targets for floorspace to be provided are aligned to the assessment of need for space in each type (approximated by Use Class) established by the Employment Land Study. The plan's policies protect land currently in industrial use and encourage intensification in the borough's identified industrial areas. The evidence supporting this approach identifies potential capacity for in excess of 300,000 sqm of floorspace to be provided through intensification. The most suitable sites for intensification are proposed to be identified through LP2 to promote the delivery of floorspace best matching identified need in the right location. This approach seeks to exceed the requirement which is set out in Policy 2 and Policy 25.

iii. Should the requirements be altered in the light of the Council's intention to roll forward the plan period (as referred to in Q31)?

The plan period is proposed to be extended to cover the minimum period required to be consistent with national policy. The Council is targeting an adoption date in the 2021-22 financial year, which would require a plan period extending into the 2036-37 financial year.

The total housing requirement should be increased, commensurate with the addition of two further years to the plan period. The plan period proposed in the Regulation 19 Local Plan is figured as 2020-2035 (Policy 2 – Scale of Growth). The requirement for the revised plan period should be 1800 homes per year, from the 2020-21 to 2036-37 financial year, or 30,600 net new homes in total.

The reference period used in the Employment Land Study for the plan period is 2018-2035. The Council considers that as the extension of the plan period does not directly impact the operation of the borough's employment policies, it may not be necessary to alter this requirement, particularly in light of the requirement for a review of the plan and concomitant update of the economic projections which form the basis for this figure in 5 years. The Council considers that there have been significant events, such as Brexit and the covid-19 pandemic which have had substantial macroeconomic impacts which are not fully reflected in this numerical expression of floorspace requirements.

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

The Mayor in his Statement of general conformity of 14 December 2020, consider that the Regulation 19 version of the Local Plan is in general conformity with the Intend to Publish version of the London Plan. [document reference]. As outlined below, the Council consider that the approach to setting the housing requirement in the plan is fully justified, consistent with national guidance, and moreover in general conformity with the London Plan.

i. Should the Plan reflect the housing target for the Borough set out in table 4.1 of the London Plan?

The London Plan sets out at Policy H1(a) the requirement that Boroughs must include the targets outlined in Table 4.1 of the London Plan in their Development Plan Documents.

A main modification is proposed to the plan to include at Policy 12 of the Local Plan reference to the 10-year housing target set out in Table 4.1 of 12,640 net additional dwellings over the period 2019/20 – 2028/29.

However, the Council does not accept that it is a requirement of general conformity for the Local Plan to set its own housing target at the same level as the London Plan. Rather, the Local Plan should seek to meet as a minimum the target which is set out in Table 4.1, and exceed it as far as possible whilst remaining in line with the strategic policies established in the London Plan. The is aligned with the Direction from the Secretary of State in relation to the publication of the London Plan (DR8).

As noted by the Mayor, the Local Plan was prepared to trail the development and adoption of the London Plan, and between the Regulation 18 and 19 consultations on the Local Plan, the examination of the London Plan, and further publication of the 'Intend to Publish' London Plan occurred. The changes made to the London Plan at this time reduced the housing targets in Table 4.1 from 17,940 to 12,640.

In between these changes being published, the Council continued preparation of the evidence base to support the Local Plan. This involved consideration of how the Council would meet the overall housing requirement of 17,940 net new homes. As noted in the Council's response to the Draft New London Plan, the Council was concerned that the delivery of small sites would not materialise.

"We are concerned that our housing target in the Draft Plan is reliant on a large proportion being delivered on small sites. The small sites target set out in Table 4.2, 889 units per annum on sites of 25 units and less, is a challenging and high target. It is also not based on evidence i.e. historic delivery rates of small sites."¹

The action taken to understand more fully the borough's capacity to deliver housing was to commission a Growth Capacity Study² (GCS), which reviewed 1,166 sites across the borough, providing a detailed consideration of the number and capacity of developable sites in the borough. The methodology used in the GCS is aligned that used in the GLA SHLAA (2017). In addition to the standardised site assessments carried out through the GCS, in line with London Plan Policy D3 - *Optimising site capacity through the design-led approach*, design-led testing has informed the indicative capacities making up the component of supply attributed to draft Site Allocations.

It is this additional evidence, commissioned in response to the Mayor's target for the borough based on meeting London's housing needs, which provides the basis for an uplifted target from the 2024/25 financial year. This does not involve an assumption of increased development on small sites in order to meet this target, but rather optimised development on

¹ London Borough of Waltham Forest - Draft New London Plan Response, 2018, available at:

<https://www.london.gov.uk/sites/default/files/London%20Borough%20of%20Waltham%20Forest%20%282609%29.pdf>

² Growth Capacity Study, 2018, available at:

<https://www.walthamforest.gov.uk/sites/default/files/LBWF%20Growth%20Capacity%20Study%2C%202018.pdf>

large sites in line with the Policies set out in the Mayor's London Plan, and this Local Plan.

The borough's housing trajectory assembles this evidence and sets out the capacity which is considered to be deliverable at each point in the plan. As there is both a significant uplift in the level of housing requirement between previous policies, and the delivery of this increased level of housing is contingent on a number of large, strategic sites which will have a phased delivery, a housing requirement which is stepped across the plan period is proposed.

The Local Plan sets a housing target based on the capacity, which is identified, taking into account the requirement to have a five-year supply of deliverable housing sites including the relevant buffer, and to have a phasing profile which ensures the borough is able to continue to meet the Housing Delivery Test. The Council has had regard to PPG³ when reviewing its policy position and has proposed the housing requirement to amount to 1800 new homes per annum from 2020-21 to 2036-37. This is an ambitious target which ensures that the borough is planning to meet identified development needs as soon as possible.

ii. 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?

Not applicable, as above.

³ National Planning Practice Guidance - Housing Supply and Delivery Paragraph: 021
Reference ID: 68-021-20190722, available at
<https://www.gov.uk/guidance/housing-supply-and-delivery>

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?

It is considered that the proposed extension of the plan period does not affect the planning strategy outlined in the plan, as the conclusions reached in the evidence supporting the plan are largely unchanged as a result of its extension. Assessment of impact, and period covered by the evidence base, is set out in LPE7 – General Matters, at page 2-3⁴. In light of national policy requiring that local plan policies are reviewed at a minimum every five years, and wider socio-economic turbulence which may have changed some of the fundamental assumptions relied on in elements of the evidence base, a plan review is expected to be initiated early into the plan period.

The revised period is consistent with NPPF paragraph 22, assuming adoption of the plan in the 2022-23 financial year.

⁴ LPE7 – General Matters, available at:
https://www.walthamforest.gov.uk/sites/default/files/2021-10/Matter_6_General_Matters.pdf

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]?

The draft LP1 was screened in August / September 2019. The Proposed Submission version of the plan was rescreened in September 2020 and the proposed modifications to the LP1 screened in April 2021 prior to submission. Likely Significant Effects (LSE) were identified in relation to the following:

- Potential LSE on the Epping Forest SAC and the Lee Valley SPA/Ramsar due to increased recreational pressures;
- Potential LSE on the Lee Valley SPA/Ramsar relating to the risk of water pollutants entering the European Site;
- Potential LSE on the Lee Valley SPA/Ramsar due to water demand;
- Potential LSE on the Epping Forest SAC and Lee Valley SPA/Ramsar through an increase in traffic and therefore air pollution; and
- Potential LSE on the Epping Forest SAC and Lee Valley SPA/Ramsar from 'urban effects'.

The HRA progressed to Appropriate Assessment (AA) as a result of the identification of these LSE on the Epping Forest SAC and the Lee Valley SPA/Ramsar. The conclusion of the AA was that all 19 Spatial Strategy Policies of the Local Plan are likely to result in residential areas that fall wholly or partly within 3km of the SAC which is within the Inner Zone of Influence. These Spatial Strategy Policies could result in the addition of 27,000 homes, the vast majority of these are likely to occur within this inner zone. The population growth associated with these new homes would result in an increase in recreational pressures on the Epping Forest SAC.

The HRA concludes that combined mitigation in the form of the Strategic Access Management and Monitoring Strategy (SAMMS) and the development of a Suitable Alternative Natural Greenspace Strategy (SANGS) will mitigate LSE arising from the LP1 strategic policies. The Council consider that this conclusion provides justification for the scale of housing and employment growth.

Q33 Are any main modifications necessary for soundness?

None.

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?

South, Central and North Waltham Forest are broad geographical and distinctive character areas of the borough. The Council's Characterisation Study (2009 and subsequently expanded in 2019 to consider character-led intensification) provide the evidence for the definition applied. This study identified character areas from an analysis of built form typologies via a street-by-street assessment of the whole borough, supported by maps and aerial photographs.

As well as reflecting the overall architectural attributes of streets, the study also captured elements such as the building configuration, plot size and urban grain, which define character areas. Using information from the Characterisation study, logical and obvious boundaries have been drawn with boundary limits following readily recognisable physical features such the road network. The broad areas of united character also represent the areas of Chingford, Walthamstow and Leyton/Leytonstone.

These distinctive areas have been carried over from the currently adopted plan (Waltham Forest Core Strategy, 2012. See Figure 4, page 12 and Table 2, page 13). In the emerging LP1 document, the same areas (Leyton/Leytonstone, Walthamstow and Chingford) have been described as South, Central, and North Waltham Forest).

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

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

Strategic locations have been identified based on evidence from the Waltham Forest Growth Capacity Study (2018). The study assessed the suitability and availability of land to accommodate growth. The study methodology included the following key stages:

- Identification of capacity sources – through a desk-based mapping exercise and site surveys to identify as many future development opportunities as possible.
- Application of a set principles including proximity and access to local facilities and public transport, optimal use of land, and considerations about local character.
- Consultation through ‘call for sites’ exercises, also seeking input from the development industry to help inform viability and site delivery assumptions.
- Detailed sites assessments and discounting, which considered national policy guidance that future supply of land identified should be available and achievable.

Arising from the assessment work undertaken, a total of 1,166 sites were identified for consideration, reduced to 443 through a ‘stocktaking’ exercise to determine the acceptability of sites in principle for housing or other development. From this, a final list of sites was identified after a discounting and screening exercise, which left 269 sites as being suitable in policy terms and therefore with potential for new development.

The final list of sites is shown in Figure 4.1. The location and clustering of these sites have been the basis for the logical and obvious boundaries drawn and described as strategic locations. These broadly encompass the designated centres of Walthamstow Town Centre, District Centres and Neighbourhood Centres, and other growth locations shown in Figure 4.1. These are considered to be growth locations with best potential for redevelopment primarily because of the availability of significant clusters of sites, in the most accessible locations which when promoted would create a network of sustainable and well-connected places.

ii) Whether these areas are 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

The Strategic Locations identified in the Plan are in general conformity with London Plan Policy SD10. The boundaries of the borough's designated centres are all within the identified strategic locations. These include Walthamstow, Bakers Arms, Highams Park, Leyton, Leytonstone and Wood Street which are also within or overlap with the Strategic Areas for Regeneration as identified in the London Plan 2021 (pages 447-483). The London Plan also designates Opportunity Areas (OA). In Waltham Forest, the Lee Valley OA including Blackhorse Lane, Lea Bridge and Leyton areas also overlap with Strategic Areas for Regeneration.

iii) How these locations contribute to achieving Good Growth (Policy 6) and growth in the related Opportunity Area

The identified strategic locations are areas where substantial growth in housing, employment and infrastructure provision is expected to occur. They are sustainable locations where redevelopment efforts will be focused to create environments where people can live and work and use more sustainable means of transport including walking/cycling/public transport. Many of these areas encompass the designated town centres, where there is already a clustering of central place activities in shopping, town centre facilities, employment, and public transport etc.

Policy 6 sets out the overarching good growth principles applicable to all new development proposals. In the strategic locations, development will be expected to make efficient use of land through intensification and mixed-use development. Through a range of policy intervention measures set out in the plan, these areas will contribute to achieving good growth. These measures include 15-minute neighbourhoods, design interventions to create high quality places and make them more inclusive, the provision of employment opportunities, promotion of healthier lifestyles, the provision of good access/linkages with nearby green and blue infrastructure including open space and leisure facilities etc,

Strategic locations are intended as mixed-use activity centres. Creating sufficient critical mass in these areas will support the delivery of infrastructure facilities and optimise the use of existing facilities. Through intensification of development, opportunities to integrate housing options for people of all ages and stages in life can be provided. Focusing growth in these areas will also reduce the pressure for substantial development in predominantly residential areas. By promoting larger schemes in these growth areas and developing synergy between proposals, more

sustainable places will emerge. This could also foster area wide solutions such as decentralised power and heating. In these areas, new homes will be delivered close to community facilities and public transport and there will be enhanced opportunities for developing a unique sense of community and place.

The Council considers that targeted intervention at these key areas will bring the opportunity to transform places and communities whilst capturing and maximising the ripple effects of growth. Opportunities for achieving synergy and coordination with neighbouring regeneration proposals will also be maximised, extending to other opportunity areas/locations and therefore leading to the development of a network of well-connected and sustainable places.

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?

The Council's response to Q35 (i) describes the process leading to the identification and selection of sites. As mentioned, a total of 1,166 sites were initially identified and refined down to 443 sites. The final list of sites was subject to a further discounting and screening exercise, which left 269 sites as being suitable in policy terms. Underlying principles applied included proximity and access to local facilities and public transport, considerations relating to national policy guidance requirements to make optimal use of land and ensure a future supply of land that is available and achievable. The methodology applied effectively eliminated the following alternative sites:

- Sites with policy constraints e.g. Green Belt/MOL land, conservation areas, environmental designations etc.
- Sites with development constraints (barriers to development or availability)
- Small sites (those likely to yield less than five units)
- Sites with viability and delivery issues

The final list of sites as shown in Figure 4.1 is a graphical illustration of the proposed spatial strategy showing the broad locations for development (as required in a Local Plan in accordance with paragraphs 20-23 of the NPPF). As such the approach is considered justified.

The delivery of Site Opportunity Locations is being taken forward as site allocations primarily through the Site Allocations Document. The emerging Site Allocations document covers 75 sites (those sites that are 'strategic' or 'key sites') and does not allocate all sites identified through the Growth Capacity Study. Remaining sites are being taken forward through the use of other planning tools including the Brownfield Land Register, Master Plans and Planning Briefs. Paragraphs 4.21-4.34 of the Plan explain the position.

The Council considers that it has identified sufficient sites, which when brought forward for redevelopment through the intensification approach set out in the plan would 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:

(i) Policy 9 (South Waltham Forest) includes Leyton Green as a Strategic Location, but this is not included in in Policy 4(A);

The identified area for Bakers Arms strategic location as shown on Figure 4.1 includes Leyton Green, the triangular area situated at the junction between High Road Leyton and Leyton Green Road. In practice this name has been commonly used to refer to the area south of Bakers Arms. In this plan, Bakers Arms and Leyton Green is one entity and not separate areas as such.

Accordingly, the policy statement (Policy 9A) needs clarification by inserting a comma after Whipps Cross and deleting the word “and” between Whipps Cross and Bakers Arms. It should read as:

“Direct development towards identified Strategic Locations of Lea Bridge and Church Road, Low Hall, Leyton, South Leytonstone, Leytonstone, Whipps Cross, **and** Bakers Arms and Leyton Green.”

(ii) 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?

The boundaries of the strategic locations are described in Figure 4.1. The strategic locations are larger areas which incorporate the boundaries of the designated town centres. The Council notes the confusion with the boundaries of the designated centres and wish to amend Policy 4 (A-C) to read as follows:

“A. South Waltham Forest: A minimum of 14,900 new homes and 3,250 new jobs in the Strategic Locations of Lea Bridge, Low Hall, Church Road, Leyton, South Leytonstone, Leytonstone **District Centre**, Whipps Cross and Bakers Arms **(including Leyton Green)**;

B. Central Waltham Forest: 6,300 homes and 1,600 jobs in the Strategic Locations of Blackhorse Lane, Walthamstow **Town Centre**, Forest Road Corridor and Wood Street **District Centre**;

C. North Waltham Forest: 2,000 homes and 1,940 jobs in the Strategic Locations of North Chingford **District Centre**, Sewardstone Road

Neighbourhood Centre, South Chingford District Centre, Highams Park District Centre and the North Circular Corridor”.

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?

The level of growth specified in Policy 4 (D) represents capacity "elsewhere in the borough" - outside the identified growth areas. The Council's Growth Capacity Study identified opportunities at several dispersed locations that need to be carefully managed to provide 3,800 new homes, representing a significant quantum of development. However, these locations are widely distributed throughout the borough on many small/medium sites outside identified growth areas. They do not qualify for designation as strategic location as they are geographically too dispersed for a critical mass to be achieved, not within designated centres or close to public transport facilities. To promote sustainable development, most of the planned growth in homes, jobs and infrastructure etc is focused in the main growth areas (strategic locations).

At many of these dispersed sites, the Council considers that relatively small development opportunities to accommodate growth in homes, employment, key services and facilities in appropriate locations would have an important role in making sure that the long-term vitality, vibrancy and overall sustainability of all parts of the borough is maintained. Typically, small scale growth proposals in such dispersed locations will be on sites that can provide a few homes (about 5 homes or more) or combined with opportunities for mixed uses including employment or other commercial/community uses.

Development in these locations will have an important role in achieving sustainable patterns of development by:

- serving as small catalysts for regeneration in local areas e.g., through good design/place making schemes (as exemplars) that could lift local areas, encourage positive change, and support wider environmental improvement.
- supporting existing and/or enhanced key services and facilities in local areas such as the provision new complementary uses/activities, which could help address essential local needs and improve the viability of existing declining services e.g., a local post office, grocery shop, laundrette, pubs, and other local services

- enabling the provision of wider benefits such as broadband connectivity, improvements in connections/linkages to other parts of the borough.

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.

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?

The Council's justification for its approach relies on the conclusions of the Growth Capacity Study 2018 (GCS); the Green and Blue Infrastructure Strategy (2020) (GBIS) and the Green Belt and Metropolitan Open Land Strategy (GBMOLS) and Focused Green Belt and Metropolitan Open Land Assessment (FGBMOL) documents of 2015 and 2019.

The GCS excluded the possibility of changes to the boundary of green belt or MOL with the potential exception of land within the Upper Lea Valley Opportunity Area in the vicinity of the Enfield Meridian water development. This is land in the area of the Banbury Reservoir adjacent to the A406 North Circular Road. Para 8.7 suggests that the release of this land would open up opportunities to benefit from investment in the area. Whilst this approach is partially consonant with the findings of the 2015 GBMOLS, it should be noted that the latter document made a recommendation only in respect of a small site known as Chingford Island (GB31). However, the review in the 2019 FGBMOL of the same site reached a less trenchant conclusion and the report noted "the relatively poor performance of the land against the Green Belt purposes is not, of itself, an exceptional circumstance that would justify release of the land from the Green Belt. In fact, the release of Green Belt land likely to result in low harm may not be appropriate or sustainable." As such the Council concluded that release of a small parcel of land in this area would yield no strategic benefit.

The 2020 GBIS notes that 27% of the borough is GB/MOL and notes "(t)he benefits and opportunities of GB and MOL....include providing opportunities for access to open spaces for recreation, sport and nature conservation interest for the urban population" in the context of overall deficiencies in access to open space which will intensify as the population grows to 2035.

Accordingly, the Council considers that there is no compelling strategic evidence that would justify greenbelt or MOL release. In the context of LP2, there is only one site which falls within the GB boundary: Site SA58 - Royal Epping Forest Golf Club. This is a brownfield site in GB adjacent to SAC in which the parameters set out in para 149 of the NPPF set the scope of development potential.

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

The NPPF Ch15, para 143 (c) states that “where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period” It has not been necessary to make use of this provision. The Council’s plan strategy seeks to meet its objectively assessed need for growth on brownfield land. Evidence from the Growth Capacity Study indicates that growth requirements could be fully met through the use of brownfield land.

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?

National policy on flood risk is set out in NPPF chapter 14 - Meeting the challenge of climate change, flooding and coastal change. Within this chapter paras 159-169 "Planning and flood risk" provides details of the level of detailed analysis and the necessary tests required to underpin local plan policies, site allocations and planning decisions.

The Local Plan is informed by a two stage Strategic Flood Risk Assessment (SFRA). The Level 1 SFRA (Aecom, 2018) provides an overview of the risk of flooding from all sources across LB Waltham Forest Borough, including flooding from rivers, surface water, groundwater, sewers and other artificial sources, and should be used to assist in the development of policy formulation, strategic planning, and application of the Sequential Test, development control and emergency planning. The methodology followed in the SFRA complies with the NPPF and it was completed in collaboration with the LB Waltham Forest, the Environment Agency and Thames Water.

A second stage SFRA was undertaken in 2020-21 to inform the site allocations in the LP2 Site Allocations Document. This latter document includes at Appendix C the most up to date modelling of Ching Brook flooding agreed with the Environment Agency.

As such and given extensive interactions with the Environment Agency on the production of the SFRA, the Council considers that the flood modelling for both its spatial strategy and its site allocations is consistent with national policy on flood risk.

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?

The NPPF deals with air quality in chapters 9 (Promoting Sustainable Transport) and Chapter 15 (Conserving and enhancing the natural environment) At para 105 the NPPF states that development should be “focussed on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health.” This theme is developed at para 186 in which it is stated that the plan-making process should consider “(o) opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement”. The para goes on to state that “Planning decisions should ensure that any new development in Air Quality Management Areas (AQMA) and Clean Air Zones is consistent with the local air quality action plan.” Waltham Forest has been an AQMA since 2001.

The key elements of the Local Plan spatial strategy are set out in the 6 Golden threads underpinning LP1’s 14 strategic objectives; of which objectives 7,8, and 11 directly reference delivering health and wellbeing improvements (7) through improving active and sustainable transport choices (8) and improving the boroughs’ green and blue infrastructure network (11). These objectives directly inform the following policies in which the objective of improving air quality is detailed and amplified in the following dimensions.

- Policy 62 – Promoting Sustainable Transport
- Policy 69 - Electric Vehicles
- Policy 80 - Parks Open Spaces and Recreation
- Policy 83- The Epping Forest and the Epping Forest Special Area of Conservation
- Policy 90 – Air Pollution.

The Council submits that the answers given in Issue 3 (Q14.-17) in relation to SA matters, and the suite of policies referenced above, demonstrate that LP1 is consistent with NPPF paras 105 and 186.

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

None.

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?

The policy approach recognises the challenges in ensuring the timely delivery of infrastructure to serve both new development and regenerate existing places. It recognises the value in working with infrastructure delivery bodies and agencies, landowners, developers and strategic partners such as the GLA and government departments and sets out a local approach towards ensuring the delivery of key infrastructure required to support growth. In London, the London Plan, Mayoral Transport Strategy and Environment Strategy have an important role in promoting a more integrated and coordinated approach to infrastructure planning across the city.

The Council considers that Policy 3 will be effective in ensuring the delivery of the identified infrastructure. The policy sets out the overarching policy principles that will apply in ensuring the delivery of infrastructure provision to support growth. The policy firstly recognises the challenges in infrastructure provision and the important role of infrastructure providers. Accordingly, it expresses the Council commitment to work proactively with delivery bodies and agencies. As acknowledged in the Infrastructure Delivery Plan, the Council has an excellent track record of providing infrastructure to support the needs of the borough’s growing population.

The Plan identifies key priority infrastructure projects – Whipps Cross Hospital, Ruckholt Road Station, Walthamstow Central Station and Leyton Underground Station. These are backed by proactive actions being undertaken through discussions, lobbying, political influences and funding agreements where necessary., Regarding Whipps Cross Hospital, the Council together with the neighbouring Council (Redbridge) has launched a political campaign calling on the government to fund the next stage of redevelopment at Whipps Cross Hospital, which is one of 6 projects promised by the government as part of its commitment to build 40 new hospitals by 2030. The position regarding the other projects is included in the Infrastructure Delivery Plan.

On the provision of expanded schools, the Council is the Local Education Authority and has a statutory duty to ensure that there are sufficient

school places for all children of statutory school age living in the borough. Chapter 10 (pages 50- 75) of the Infrastructure Delivery Plan (KD12) describes the projects undertaken previously and planned for the future, also demonstrating the Council track record in ensuring the provision of sufficient school places.

Similarly, the position on the provision of healthcare facilities including GP practices is set out in pages 1- 49 of the Infrastructure Delivery Plan (KD12). The Waltham Forest Clinical Commissioning Group (WFCCG) is responsible for commissioning hospital and community healthcare services in Waltham Forest. The Council works closely with WFCCG in meeting the health care needs of local people, both now and in the future.

The policy gives guidance for developers or applicants for planning permission on the Council's expectations when considering planning applications. The Council considers these are reasonable requirements to be sought and implemented through the planning application process.

Regarding funding, the infrastructure funding gap will be reviewed in 2022 when the Community Infrastructure Levy (CIL) charging schedule will be revised. A CIL viability study has been commissioned and is expected to be completed in Spring 2022. The CIL income based on the revised CIL rates, coupled with planning contributions, will boost the delivery of the infrastructure items required to support the growth set out in the Plan. The annual reviews of the Infrastructure Delivery Plan include partnership work with infrastructure providers to ensure the optimal delivery schedule.

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?

The Local Plan is supported by a Viability Study (KD13.1) which made assessment of the ability of developments in the borough to accommodate the requirements of the policies in the Local Plan alongside prevailing rates of Community Infrastructure Levy. The specific cost impacts of policies are considered at 2.64 of the Viability Study and building and design requirements are incorporated into the build costs as outlined at 4.35-4.40 of the study.

Overall, the study concludes that the proposed policies and its flexible approach to applying its affordable housing requirements through the Mayor's threshold approach will ensure an appropriate balance between delivering affordable housing, sustainability objectives, necessary infrastructure and the need for landowners and developers to achieve a reasonable return.

The distribution and scale of growth across the borough is informed by assessments of viability. The Growth Capacity Study made a broad assessment of the viability of schemes, and development density based on assumptions which have been developed and tested through the London-wide SHLAA. The Local Plan Viability Study shows that development in the lower values areas in the Borough for lower density schemes, which incur lower build costs, and on sites with lower existing use values, is viable. More dense development is therefore concentrated generally in the higher value areas, where denser schemes, which incur higher build costs, are viable. This is also supported by the development seen to date in this part of the Borough. This is elaborated further in Matter 8.

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?

The Council considers that there is no disconnect between both documents. On the implementation/deliverability of the Plan's spatial growth strategy, paragraph 4.46 of the Plan identifies the tools that will be used. LP1 set out the broad locations for land use. The key role of LP2 is to allocate specific sites for development in line with the vision, strategic objectives, spatial strategy, and all other policies contained in LP1. Paragraph 1.4 of the Proposed Submission Site Allocations Document (November 2021) makes it clear that both documents (LP1 and LP2) will be used to inform decisions on planning applications and therefore should be read together.

Paragraph 1.6 (Introduction Chapter) of the LP1 explains the complementary relationship between both plans. Several other references as below also draw attention to this relationship including:

- Paragraphs, 1.6, 4.13, 4.20, 4.25, 4.46, 5.9, 5.20, 7.14, 11.48, 14.13 and 14.14
- Policies – 5 (E), 9 (B) (viii), 9 (D), 9 (E), 9 (G), 10 (A) (v).

Regarding the programming of both documents (LP1 and LP2), a key consideration has been the need to first establish the broad principles for growth and change in LP1, so that this informs the detailed site-specific approach in LP2. Accordingly, LP2 purposely runs behind LP1, but has been carefully programmed to align the different stages as closely as possible. Statutory consultation work has been run in tandem. Between September – December 2020, while LP1 was at the Regulation 19 consultation stage, LP2 was at the Regulation 18 stage. LP2 is currently at Regulation 19 consultation stage.

Paragraph 004 (Reference ID: 61-004-20190315) of National Planning Policy Guidance (NPPG) provides guidance on whether all plan policies should be contained in one document. It mentions that this will depend on the issues and opportunities that exist locally and that local planning authorities should, in consultation with their local community, consider the most appropriate way to plan for the needs of their area.

Per our response to Q18, the Council initially set out to prepare a single consolidated concise local plan document. However, in response to local concerns about growth, its impact on local character and the need for site specific information, the Council considered it appropriate to introduce an additional development plan document (LP2 - Site Allocations). In making this decision, the Council considered the implications for delaying the plan to incorporate more detailed site-specific proposals and the additional evidence required to justify site-specific proposals. Including all 75 site allocations as currently identified as required to comply with the NPPF requirement (paragraph 22) to allocate sufficient sites to deliver the strategic priorities of the Council would have created a large and unwieldy plan document.

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?

The increase in delivery which is projected and required in order to meet the borough's proposed housing target involves a considerable uplift from the current level of housing delivery.

The current level of housing delivery is around 1000 units per annum⁵ (across the period 2016-2021). The increase across the next 5 years is around 50%, to meet an average of 1568 per annum across this period. However, with the stepped trajectory modifying the annual requirement this equates to 1264 new homes per annum in the 2021-22, 2022-23, and 2023-24 Financial Year, and an increased target of 1770 and then 2276 in 2024-25 and 2025-26 respectively.

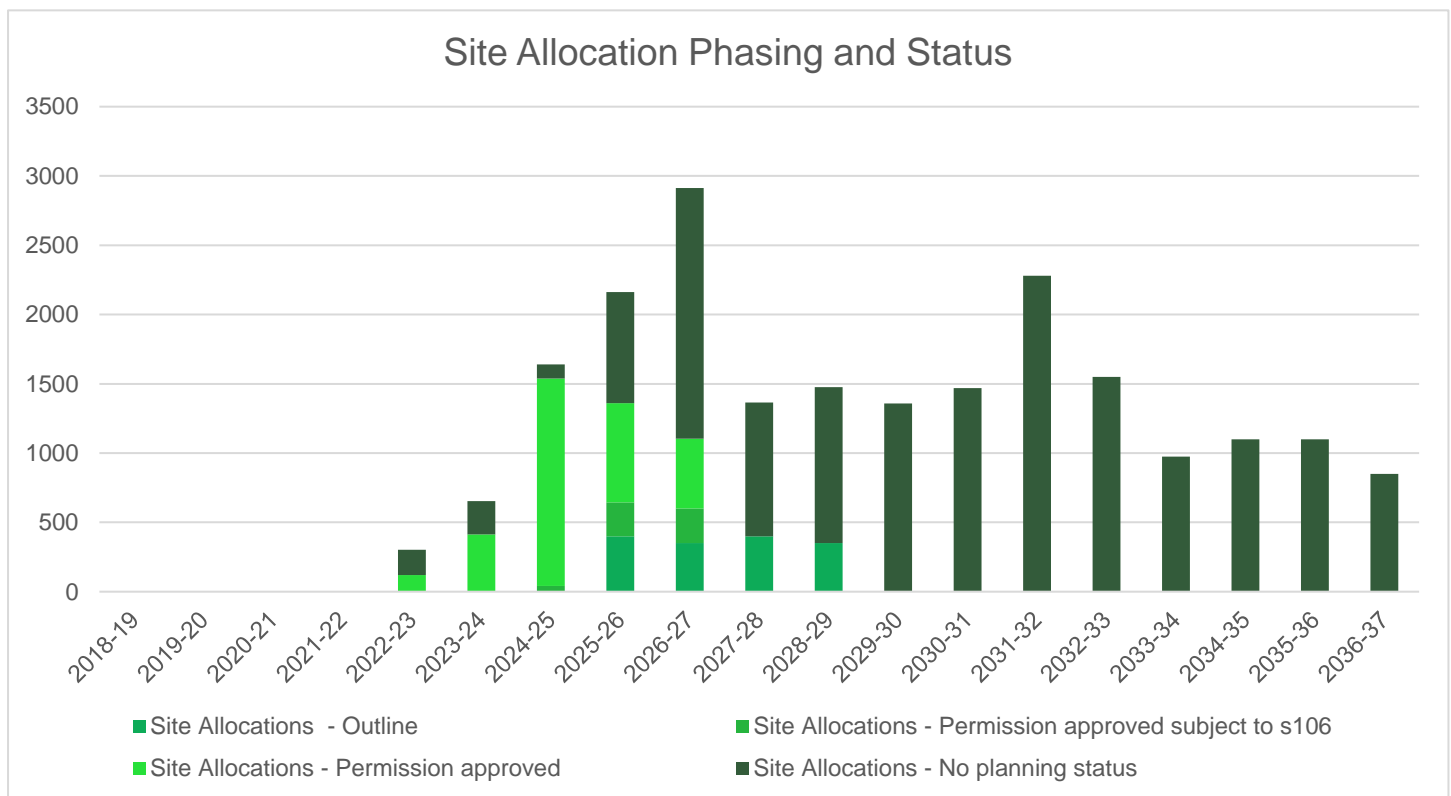
The Council considers that meeting this level of increase is achievable and deliverable, on the basis of the prior achievements in increasing housing delivery, through consideration of the progress made towards demonstrating deliverability in relation to the identified supply, and the experience of neighbouring authorities in London.

Under the previous Local Plan (2012), a similar level of increase to that proposed here was achieved. Comparing the three-year rolling average from 2012-15 and 2015-2018, an increase from approximately 500 to 1000 units per annum was achieved, and then maintained. This increase of c.100% is analogous to the planned 'step change' in delivery.

A good proportion of the development which is expected to form the basis for this step-change and increase in housing delivery already has planning permission. Of the total number of units expected to complete in the year which the requirement is proposed to increase to 1770 units (2024-25), units amounting to 85% of the requirement have been granted full planning permission. In 2025-26, when the requirement is proposed to increase to 2276 units, approximately 30% of this total has full planning permission, which increases to 60% when those subject to s106 and outline applications are included. The Council can have considerable confidence in the delivery of a number of strategic sites, which it owns and is developing with partners or through the Council's property development company Sixty Bricks.

⁵ London Borough of Waltham Forest Authority Monitoring Report – Housing 2020-21, 2021, Table 5 - p.6, available at: <https://www.walthamforest.gov.uk/sites/default/files/2021-12/Authority%20Monitoring%20Report%20-%20Housing%202020-21.pdf>

The housing trajectory has been developed to ensure that there is a clear understanding of the projected performance against the Housing Delivery Test, and in terms of Five-Year Housing Land Supply (5YHLS) over the plan period⁶. The trajectory demonstrates that with the phasing and capacity attributed to the sites composing the trajectory, the borough is expected to be able to meet the Housing Delivery Test in every year to 2029-30 and maintain a 5YHLS inclusive of an appropriate buffer throughout the plan period. The Council has outlined in its Housing Position Statement⁷ a deliverable supply which includes two years of the highest level the requirement reaches. The Council will continue to monitor the progress made towards submission and expected development phasing of schemes and maintain a live trajectory in order to ensure that further into the plan period this confidence can be assured.



⁶ As outlined in LPE10 – Housing Trajectory Summary, available at: <https://www.walthamforest.gov.uk/sites/default/files/2021-11/LPE10%20Housing%20Trajectory.pdf>

⁷ LPE9 – Housing Position Statement September 2021, available at: https://www.walthamforest.gov.uk/sites/default/files/2021-11/LPE9%20Housing%20Position%20Statement_September%202021%20%28002%29.pdf

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?

The scale and distribution of proposed growth has been positively prepared. Policy 2 seeks to deliver 27,000 additional homes and 52,000 sqm of employment floorspace. This represents meeting as far as possible the Council's objectively assessed need for housing and employment development. Supporting evidence justifying this requirement comes from the evidence base. Key studies are the following:

- The Strategic Housing Market Assessment (SHMA, 2019). From this, the Council's objectively assessed need (OAN) for homes is 1,810 dwellings per annum, which over the 15 years plan period equates to approximately 27,000 new homes.
- Waltham Forest's Employment Land Study (2019), which provides the supporting evidence justifying the need for an additional 52,000sqm employment floorspace.

The position regarding retail need is explained in paragraph 4.7 and 11.4 of the Plan and is justified by evidence from the Town Centres and Retailing Study 2019.

The distribution and management of the proposed level of growth is set out under Policies 4 (Location of Growth) and 5 (Management of Growth). The plan identifies the broad geographical areas where growth will be directed to. These are the 'Strategic Locations' and 'Site Opportunity Locations' set out in Policy 4 and Figure 4.1.

Evidence supporting the distribution of growth comes from the Growth Capacity Study (2018), which assessed the suitability and availability of land to accommodate growth. As explained in paragraph 4.24 of the plan, the identification of the strategic locations has been derived and informed by the outcome of previous consultation. At the Issues and Options stage (Direction of Travel document 2017), alternative locations for accommodating growth were presented and there was strong support for the combined approach involving a dispersed pattern of growth in identified hubs, town centres and opportunity locations. Sites at these locations have been tested for their potential capacity through the Growth Capacity Study (2018) and this alongside the regeneration opportunity in parts of the borough has formed the basis and rationale for distributing growth.

The policy approach taken was tested through the Sustainability Appraisal process. See Sustainability Appraisal Report (KD4.2, page 73). This considers that Policies 2 (Scale of Growth), 4 (Location of Growth) and 5 (Management of Growth) support the achievement of sustainability objectives, address key sustainability issues and therefore will have significant positive effects.

With regard to effectiveness, paragraph 4.46 identifies the delivery tools that will be applied in managing growth and change. These include the Site Allocations DPD, Area Based SPDs/Masterplans and Planning Briefs. Neighbourhood Plans will also have a role as well as development promotion through the Brownfield Land Register and the Council's regeneration work generally. Work is currently underway regarding the Site Allocations Document (currently at Regulation 19 stage). The following Masterplan SPDs have been identified for preparation and are currently in progress.

- Leyton Mills - Urban Design Strategy and Development Framework for New Spitalfields, Leyton Mills, Eton Manor and Temple Mills Lane
- Chingford Mount Town Centre Framework
- Leytonstone Town Centre Framework
- Blackhorse Lane SIL Masterplan
- Lea Bridge SIL Masterplan

The Council considers there are no regulatory or national planning barriers to the delivery of the growth aspirations of the Plan at the locations identified. The Mayor's letter of conformity dated 14 December 2020 supports the approach taken noting as follows:

"The overarching broad strategic approach to delivering growth over the plan period is to divide the borough into four geographic sub-areas: South, Central and North Waltham Forest and finally, Elsewhere in the Borough. Each sub-area is allocated indicative targets for growth based on the capacity assumptions and evidenced need set out in the draft Local Plan and the emerging Site Allocations document. Specific, but fairly broad areas, called Strategic Locations are identified within each sub-area and within these, at a finer spatial level, are much more precise site opportunity locations, within which, or are themselves, the borough's site allocations. The process by which the draft Plan drills down to ever increasing spatial levels of detail follows a rational and methodological approach which is welcome and reflects the fact that the South of the borough is a sustainable location for development, benefitting from excellent public transport services and a more urban setting".

Delivery partners such as landowners have not resisted to these proposals. Generally, positive responses have been received through the 'call for sites' exercises undertaken. The approach taken aligns with the plan strategies of neighbouring authorities who are also promoting growth at their sustainable locations including town centres and other places.

To reflect changing circumstances, the Plan includes a monitoring strategy. The Council has declared its intention to monitor the performance of the plan through the Authority Monitoring Report (see Policy 97 and Appendix 5 of the Plan).

Q 48 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?

The Plan's vision points to the establishment of sustainable neighbourhoods - well-connected places and liveable neighbourhoods well linked by walking and cycling routes, improved public transport, with leisure and recreation provision and enhanced job opportunities for residents. To achieve this, the vision drills down to strategic objectives that seek to deliver a spatial and growth strategy that promotes development in growth areas (strategic locations and site opportunity locations).

The Council considers that the proposed spatial and growth strategy will be effective in achieving the Plan's vision and strategic objectives. The proposed increase in the supply, choice and mix of homes (Strategic Objective 1) will be mainly delivered in the proposed growth locations where new sustainable neighbourhoods will be created. Similarly, employment growth (Strategic Objective 2) will be provided and located in established employment areas and generally elsewhere in town centres which will be well connected by walking, cycling and public transport (Strategic Objective 8).

In these nodal locations/areas, the proximity of employment opportunities, access to shopping and town centre facilities and services, as well as well conveniently located infrastructure in will further support the establishment of liveable neighbourhoods in accordance with Strategic Objective 3, 4 and 5. The location of new and expanded infrastructure provision in the growth locations and elsewhere including the creation of a culturally diverse and distinctive borough with cohesive communities

(Strategy objectives 6, 7 and 10) will be also guided and achieved through the proposed spatial and growth strategy.

Through the proposed growth strategy, Strategic Objectives 11,12 and 14 will be achieved. By focusing new development in growth areas, the proposed strategy will protect and enhance the borough's environmental and natural assets from development. The strategy recognises the interdependencies between different activities and places and therefore the spatial linkages that need to be put in place to facilitate this such as through the development of a multi-functional network of green and blue infrastructure.

By promoting larger schemes in growth areas and developing synergy between proposals, sustainable neighbourhoods will emerge. This would, for example, foster area wide solutions such as decentralised power and heating to address climate change (Strategy Objective 14). In these areas, new homes will be delivered close to community facilities and public transport and there will be enhanced opportunities for developing a unique sense of community and place supporting the Plan's vision of creating sustainable neighbourhoods.

The Council considers that targeted intervention at growth locations will bring the opportunity to transform places and communities whilst capturing and maximising the ripple effects of growth. Opportunities for achieving synergy and coordination with neighbouring regeneration proposals will also be maximised, extending to other opportunity areas/locations and therefore leading to the development of a network of well-connected and sustainable places.

As set out in response to Q47, the overall scale and distribution of proposed growth is appropriate and justified. The impact of growth on Habitats Sites and air quality, is addressed in the Council's response to Q8, Q9 and Q41.

With regard to general consistency with the London Plan, the Mayor of London's letter of conformity supports the policy approach taken under Policy 90 of the Plan. It declares that the Plan sets out a positive approach towards improving London's air quality by ensuring that development proposals are at least air quality neutral consistent with Policy SI 1 of the London Plan.

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

None