

Waltham Forest Town Hall, Forest Road, Walthamstow, E17 4JF

Ask for: Sarah Parsons

Email: Sarah.parsons@walthamforest.gov.uk

Direct line: 07570167985

11 May 2022

Dear Mrs S Housden & Mrs C Jack,

Thank you for your letter of 5 May in relation to the Examination of Local Plan Part 1. The Council wishes to thank the Inspectors for their further consideration of matters which were discussed at the hearing sessions and appreciates the clarity with which the options for progress have been set out.

The Council welcomes the elaboration of the main items of work which the Inspectors consider necessary in order to support progress on the plan, and the required updates to our evidence, as set out at paragraph 50 of the letter. In anticipation of the Inspectors' letter, the Council has already progressed further work on several of these areas, following action points discussed at the hearing sessions.

In particular, the Council considers that the matters raised in relation to housing delivery and the five-year housing land supply, tall buildings, and employment land are in-hand and can be addressed swiftly.

- The Council considers the Plan's housing requirement to be justified and can demonstrate with confidence a robust five-year supply of deliverable sites. As discussed at the hearings, the Council has already commenced work to assemble the evidence it holds to more clearly demonstrate the deliverability of all key sites and provide further detail in regard of projected completion dates. This robust evidence is informed by a healthy pipeline of over 9,000 homes that are either currently under construction, or benefit from planning permission or a resolution to grant planning permission. The Council's engagement with landowners and developers on key sites and collaborative masterplans has been extensive and is ongoing across all Strategic Locations. This can be submitted alongside the evidence of the original Growth Capacity Study to fully support the housing pipeline across the whole plan period.
- Whilst main modifications are proposed, the approach to tall buildings remains consistent with the Regulation 19 draft, and is in line with the Plan's growth strategy, and the evidence assembled in the form of the Characterisation and Intensification Study, the Skyline Study, and masterplanning work undertaken to date in support of a character-led approach to intensification. This can be collated and presented in

support of the approach outlined in the Statement of Common Ground (SoCG) agreed with the GLA.

- The production of evidence in support of changes to Strategic Industrial Land (SIL) designation is progressing in collaboration with the GLA, in the form of the Blackhorse Lane masterplan.

As discussed at the hearing sessions, some of the ongoing work to progress the Plan requires ongoing liaison with external bodies and further technical work. In particular, we are positively progressing dialogue with Natural England and the City of London Conservators of Epping Forest on the finalisation of the Air Quality Mitigation Strategy (AQMS) and Suitable Alternative Natural Green Space (SANGS) strategy in order to provide strong additional assurance around mitigation measures that fully address concerns relating to the potential for atmospheric pollution and disturbance from recreation. This will provide further clarification of the capacity, quality, and deliverability of the SANGS sites.

The Council considers that the proposed level of housing growth and spatial strategy are fully justified, but accepts that the elaboration of the options considered at various stages of plan preparation have not been sufficiently reflected in the Sustainability Appraisal (SA). This additional appraisal work is currently being scoped and we will confirm a definite timeframe for its production, with full information from the Habitats Regulation Assessment (HRA) available to be considered and reflected in its conclusions.

In light of the above, the Council considers that Option 2 is the most pragmatic route to progress the Plan. The Council will now undertake further scoping of the work required and revert shortly with confirmation of the suggested work programme and likely timeframes.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'SP', followed by a long horizontal flourish.

Sarah Parsons
Assistant Director – Place & Design