

**Waltham Forest Local Plan (LP1) 'Shaping the Borough'
Examination**

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Ms S Parsons
Assistant Director
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SENT BY EMAIL

27 May 2022

Dear Ms Parsons,

Waltham Forest Local Plan Part 1 Examination

Thank you for your letter of 11 May 2022.

We have no further comments on the Council's response but in order to assist the development of a work programme and to inform future timescales, we have outlined below the various work streams that we consider need to be actioned going forward. We have listed them in order of the priority that we consider will be necessary to ensure a logical sequence of events to address the issues raised in our post hearing letter.

1. Undertake a strategic level, Borough-wide Sequential Flood Risk Test.
2. Undertake further Sustainability Appraisal work to assess reasonable alternatives, including the 10 year target for net completions in Waltham Forest set out in Table 4.1 of the London Plan.
3. Update the latest version of the Air Quality Study in accordance with Natural England's requirements and liaise with Natural England, the Conservators of Epping Forest and other organisations as necessary to finalise the Air Quality Management Strategy in response to any updated modelling.

4. Liaise with Natural England, the Conservators of Epping Forest and other organisations as necessary to revise the draft Suitable Alternative Natural Greenspace Strategy to provide further clarification of the capacity, quality and deliverability of the proposed sites, and to confirm whether any additional sites would be needed.
5. Housing Delivery
 - Update of the trajectory in the Housing Position Statement, including updating completions, commitments, updated timescales for delivery and evidence of consultation with site promoters for key sites, in addition to the Follow Up items from Matter 3.
 - Update the evidence of the five year housing land supply position over the Plan period.
6. Evidence and justify the proposed changes to the approach to Tall Buildings, including any implications for the strategic approach to housing growth and delivery. Also, evidence and justify the areas mapped and identified as appropriate for tall buildings.
7. Main modifications to Appendix 2 and a change to the Policies Map and Figure 9.1 to deal with the changes to Blackhorse Lane Strategic Industrial Location.

We would be pleased to receive a realistic assessment of when these various work streams could be completed by in order that we can establish a timescale for the future progress of the Examination.

Given the varied topics and nature of the work streams and the evidence that underpins them, the Council should produce a Topic Paper summarising how the issues identified in the post hearings letter have been addressed and outlining the evidence base that underpins the approach taken. This could also include an indication of where any further Main Modifications will be necessary for soundness, in addition to those included in the Follow Up Lists.

We propose that in order to avoid any duplication of public consultation, the various evidence base documents for the above work streams and the Topic Paper form the basis for the Matters, Issues and Questions for Stage 2 of the Examination. The evidence base documents and Topic Paper would be made available for consultation and comments/responses on them would be sought through our Matters, Issues and Questions.

Given that some of the potential changes to the Plan may be significant, the scope of notification on the Topic Paper, accompanying evidence base and Matters, Issues and Questions should be broad eg including everyone who was notified at the Publication stage for a period of 6 weeks.

Stage 2 hearings would be convened to cover the matters in the Topic Paper, the evidence base and responses to the Matters, Issues and Questions. A timescale for those hearings will be established in due course.

We are not seeking comments from anyone else on the contents of this letter, but we would be pleased to receive the Council's response and any comments on the way forward for the Examination proposed above.

Yours sincerely

Catherine Jack and Sarah Housden

INSPECTORS