



**BNP PARIBAS  
REAL ESTATE**

## **Written Statement Responding to Inspector's Questions**

### **Matter 3: Housing Supply and Other Borough- Wide Housing Policies**

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## **Examination of the Waltham Forest Local Plan Part 1**

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**Prepared on behalf of LocatED**

**Respondent I.D: 1219917**

**Our ref: JC/210198**

21<sup>st</sup> February 2022

**Matter 3: Housing Land Supply and Borough Wide Housing Policies**

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

**Issue 1 – Whether the Plan will provide for a sufficient housing land supply to deliver the planned scale of housing growth over the plan period and whether a deliverable five-year supply of housing will be available on adoption (Policies 2-12)?**

- Q50: *Is the Plan consistent with the expectation of NPPF Paragraph 68 for planning policies to identify a sufficient supply of specific, deliverable sites for years 1-5 of the plan period and specific, developable sites or broad locations for growth for years 6-10 and where possible for years 11-15? In particular:***
- i. ***Having regard to the Planning Practice Guidance, what is the estimated total supply of deliverable and developable new housing during the Plan period 2020-2035? What is the estimated supply from each of the following sources during the plan period:***
    - a. ***Sites with detailed planning permission for 0 or more dwellings***



the borough need to be 'genuinely affordable for existing and future residents'. This means that the proposed Local Plan seeks to deliver only 900 affordable homes per annum, though its own evidence base identifies a need for 1,258 homes per annum. This means that there would be an undersupply of 358 affordable homes per annum, or 5,370 affordable homes over the 15 year plan period. This assumes that 50% of the homes delivered would be affordable, although the Council's most recent 2020 – 2021 Authority Monitoring Report (AMR) published December 2021 states that:

*'4.4.3.1. Market housing has been the most consistent contributor to Waltham Forest's housing supply in every year except one. Since 2012, market housing has supplied the greatest proportion of units to overall supply.'*

- 1.11. Indeed, the AMR 2020/2021 indicates that of the 7,937 homes net additional homes delivered in the period 2012/2013 – 2020/2021, only 2,631 were affordable tenures, representing 33% of the overall provision (despite a 50% target set out at the adopted Policy 12). This clearly demonstrates that the majority of new affordable housing in the borough is delivered as a contribution of major developments in the borough. Applying the same proportion to the new annual Local Plan requirement of 1,800 homes would result in 594 affordable homes per annum being delivered in the borough per annum. That represents only 47% of the annual need of 1,258 new affordable homes as set out in the SHMA. Therefore, a reasonable estimate would indicate that the proposed Local Plan would result in a shortfall of 664 affordable homes every year. Over the 15 year plan period that would equate to a shortfall of 9,960 affordable homes.
- 1.12. Given the above matters, there are concerns as to whether the proposed draft Local Plan as currently prepared would deliver the affordable housing needs of the borough, as required by Paragraph 11(b) and 20(a) of the NPPF.
- 1.13. As the majority of affordable housing would come forward as a contribution from market-led housing developments, the Council could carefully consider increasing the overall housing target for the borough in order to provide a stronger basis for seeking to address the affordable need in the borough.
- 1.14. It is also highlighted that the Former Thames Water Site has the potential to provide a significant contribution to affordable housing needs (as well as market housing).