

23 January 2023

FAO: The Programme Officer

By Email Only

Dear Sir / Madam,

LBWF Local Plan Part 1 Inspectors Further Matters, Issues and Questions

Representations from the City of London Corporation

Deloitte is instructed by the City of London Corporation ('CoLC') to advise on planning matters in respect of the New Spitalfields Market Site ('the Site'). Deloitte previously submitted representations on behalf of the CoLC to the London Borough of Waltham Forest ('LBWF') Local Plan Part 1 Regulation 18 Consultation in September 2019 and the Regulation 19 Consultation in December 2020. Deloitte observed the Local Plan 1 Stage 1 Hearings in March 2022 on behalf of the CoLC.

The Inspector has issued Further Matters, Issues and Questions which are open to consultation from 5 December 2022 to 23 January 2023. This letter sets out CoLC's comments on the Further Matters, Issues and Questions in relation to the Site only. The CoLC, as the Conservators of Epping Forest, may submit separate representations that specifically relate to the Epping Forest Special Area of Conservation.

Context

The Site is owned and operated by the CoLC as a wholesale fruit, vegetable and flower market. It is located in Leyton, East London on an approximately 13-hectare site and is the largest revenue earning fresh produce and flower market in the UK. The market houses more than 115 trading units for wholesalers in the 28,700 sqm main Market Hall building. There are also four separate buildings providing 3,720 sqm of self-contained units for catering supply companies, fruit importers and other related businesses, as well as accommodation for companies that provide back-up services such as diesel/propane supplies, specialist pallet services and forklift truck maintenance. There are over 1,900 parking spaces for traders, customers, staff and market café customers.

The CoLC has established the Markets Co-location Programme which is a once-in-a-generation opportunity to work with traders, customers, Londoners and central, regional and local government partners to co-locate Billingsgate Market, Smithfield Market and New Spitalfields Market onto a single site at the former Barking Reach Power Station in Dagenham Dock, East London. The CoLC submitted a private bill to Parliament in 2022 to move Billingsgate Market and Smithfield and it remains the City Corporation's

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ambition to relocate New Spitalfields to Dagenham Dock alongside Billingsgate and Smithfield at a later date.

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

The Scale of Housing Growth

2.2 The Council now proposes to roll forward the Plan period from 2020–2035 to 2023/24 – 2037/38 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 should the overall scale of housing growth be altered in the light of the amended Plan period?

CoLC notes that the updated housing trajectory submitted by LBWF sets out the following estimated delivery for housing at the Site:

- 2030-31: 250
- 2031-32: 250
- 2032-33: 250
- 2033-34: 250
- 2034-35: 250
- 2035-36: 500
- 2036-37: 500
- 2037-38: 500

CoLC agrees with these estimates.

The Distribution of Housing

2.4 Overall, is the scale and distribution of housing and employment growth justified, including with regards to general conformity with the London Plan's housing target for the Borough, flood risk, the effect on Habitats Sites, and the effect on air quality? Are any main modifications necessary for soundness?

CoLC has reviewed the updated information provided by LBWF and agrees that its justification for the scale of housing at the Site is sound and in general conformity with the London Plan.

Matter 3: Housing Land Supply and Borough Wide Housing Policies

Housing Land Supply Over the Plan Period

3.1 Do the Council's Updated 5 Year Housing Land Supply (LPE32) and Updated Housing Trajectory (LPE31) demonstrate that there will be a deliverable five-year supply of housing land at adoption of the Plan and that there will be a reasonable prospect of this being maintained throughout the remainder of the Plan period? In particular:

a. Having regard to the Planning Practice Guidance, does the evidence support the estimated supply of deliverable and developable new housing sites during the revised Plan period 2023-2038?

b. Is there sufficient headroom in the housing supply expectations?

c. Is it appropriate to rely to such a degree on future housing allocations in LP2?

d. Is a five-year supply of housing sites necessary for the soundness of this Plan?

e. Are the expected lead-in times, dates for first completions, rates of development (dwellings per year), and net site capacities realistic for the sites included in the 5 Year Housing Land Supply Statement (LPE32)? Including for the following sites:

i. The Score Centre

ii. Lea Bridge Gas Holders

iii. The Town Hall Campus

iv. Sterling House/Homebase

v. Marlowe Road Estate

vi. Avenue Road/Thorne Close

vii. Estate Way

viii. Standard Public House

ix. Blackhorse Lane (SIL 3)

x. Joseph Ray Road

xi. Lea Bridge Site 1_2_3

xii. Hylands Phase 3

Should New Spitalfields Market move, the CoLC agrees the expected lead-in times, dates for first completions, rates of development (dwellings per year), and net site capacities for the Site are realistic and have a reasonable prospect of being delivered.

3.3 To what extent is the delivery of the planned housing growth reliant upon tall buildings and is this justified?

CoLC notes that LBWF is proposing that a new map is added to the Local Plan showing sites with potential for tall buildings. CoLC notes that the Site is identified on the map as having potential for tall buildings. CoLC is supportive of this as the Site is at a key gateway location to the LBWF and represents an opportunity to deliver a significant number of new homes and jobs in line with the housing targets for the borough.

Matter 6: Build Environment, Heritage and Design

Tall Buildings

6.3 At a strategic level, are the sites/locations identified on the map at Figure 2 of the Topic Paper (LPE30 page 52) as having potential for tall buildings appropriate and justified by the evidence? To what extent has the Skyline Study (LPE46) informed the sites/locations identified in Figure 2?

CoLC has reviewed the Skyline Study for the Site and agrees with its analysis and conclusion that tall buildings would be appropriate. The Site is located at the entrance to the LBWF at a gateway and landmark

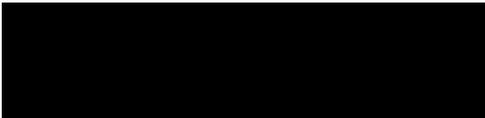
location which is appropriate for tall buildings. The tallest buildings are likely to be located closer to the railway line with the massing stepping down towards the Metropolitan Open Land.

Summary

In summary, the CoLC continues to be broadly supportive of the growth ambitions and suitability for redevelopment and tall buildings on the Site and in the South Waltham Forest Area. This letter sets out CoLC's comments on the Further Matters, Issues and Questions in relation to the Site only. The CoLC, as the Conservators of Epping Forest, may submit separate representations that specifically relate to the Epping Forest Special Area of Conservation.

I would be grateful if you could please confirm receipt of this letter of representation in writing. On behalf of our client, we would be pleased to work with the LBWF further to support the evolution of local planning policy. We therefore request that we are kept up to date with the next stages in the examination of the Local Plan. If you have any questions please contact my colleagues Alix De Nercy (020 7007 9485 / adenercy@deloitte.co.uk) or Nathan Hiles (020 7303 7501 / nathanhiles@deloitte.co.uk).

Yours sincerely



Deloitte LLP