

Waltham Forest Draft Local Plan:

Frequently Asked Questions

From September to December 2020, the Planning Policy team held 13 open public engagement sessions across the borough, six face-to-face, and seven online. During these, residents asked many important questions; officers have provided answers to points most frequently raised.

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General questions

How has the Draft Local Plan changed since the 2019 version and consultation?

We have spent the past year redrafting the Local Plan in response to the 2019 consultation and new evidence. Changes include:

- Reviewed and adapted the Plan in light of the Council’s Economic Recovery Plan and High Street Action Plan in response to the Covid-19 pandemic
- Clarified the Council’s Planning Policy Framework comprising two development plan documents Local Plan Part 1: Strategic Policies and draft Local Plan Part 2: Site Allocations
- Policies reworded. Less jargon and clearer for everyone to understand and interpret
- Introduced a new policy ‘Infrastructure Provision for Growth’ setting out how planning decisions on infrastructure provision will be made. This is to address issues raised about infrastructure provision

- More areas of the Borough referenced eg Walthamstow Village and Higham Hill
- Highams Park Neighbourhood Plan acknowledged as part of the Council's Development Plan
- Policy on town centre revitalisation / regeneration strengthened to encourage centres to re-imagine themselves and adapt to change (eg Covid 19)
- Revised policy on taller/tall buildings for better clarity and interpretation – clarifying appropriate locations and how decisions on building height will be made [See Policy 57]
- Transport policies revised to promote more active travel, walking, cycling and public transport. Revision to parking standards
- Archaeological Priority Areas reviewed. Changes made to area boundaries
- Stronger policy protection for Epping Forest Special Area of Conservation (SAC)
- New policy on trees introduced to encourage new trees, protect and manage their loss
- Strengthened Parks and Open Spaces policy for better clarity and interpretation
- Climate change policies refocussed to address the Climate Emergency

How will the Borough retain the distinctive characters of its different neighbourhoods?

To ensure that growth is suitably managed, and local character is protected, the plan contains a range of policies to guide the redevelopment of sites/areas. The spatial approach taken recognises the divergent character of local areas and includes a locally distinctive policy response as covered under Policy 8 of the Plan. It introduces a typology for managing change in local areas based on evidence from the boroughwide [Characterisation and Intensification Study](#).

On this basis, sites or areas with existing distinctive character, but requiring some repair to strengthen and improve character will be suitable for 'reinforcement'. Other sites with less distinctive character requiring significant change will be suitable for either 'transition' or 'transformation'. In making decisions on design and local character, other policies of the Plan also apply. These include - Policy 56 (Delivering High Quality Design), Policy 57 (Taller and Tall Buildings), Policy 58 (Residential Space Standards) and Policy 59 (Amenity).

The Council has apportioned growth in response to these different characters. The south and central parts of the borough, being much more urban in character, have a greater number of sites available for growth. The north of the borough is more suburban in character with a rural boundary with the Epping Forest District and so a lower-density approach is more appropriate. Housing targets have also been distributed to reflect this – of the 27,000 new homes needed in the borough, the smallest share of 4,000 has been allocated north of the North Circular.

In more sensitive areas, special consideration will be given to the design of buildings in terms of how the mass of the building is spread across the site and materials used so that it blends well with the local vernacular.

Has provision been made regarding the changing urban landscape post Covid?

In preparing the Local Plan, Council has taken reasonable steps to ensure that plan policies are fit for purpose in responding to the future requirements arising from population growth and other economic changes, including the Council's [Economic Recovery Plan](#) and [High Street Action Plan](#). Policies in the Plan have been prepared at a time of uncertainty associated with the Covid-19 pandemic, which is acknowledged. The Plan must have built-in flexibility and contingency to respond to changing economic circumstances, and all evidence to date suggests that housing need, alongside the need for jobs and investment is greater than pre-Covid.

However, the full effect of the pandemic is presently unknown, and indeed it could take some time for new evidence to be become established and then modelled in future projections to inform policy development. Accordingly, the Plan includes a commitment to monitor the performance of policies and to review the plan where necessary within five years, in accordance with national planning policy.

Why are we pressing ahead with the plan in the middle of a pandemic? Why not just pause it?

The Council's current Local Plan Core Strategy was adopted in 2012. Government policy requires local plan documents to be regularly updated to ensure that they are responding to changing local needs and circumstances. It is a legal requirement for Local Planning Authorities (LPAs) to review their Local Plans within five years of the date of adoption. There is also requirement for all LPAs to have up-to-date Local Plans in place by December 2023 or face central government intervention. If planning policies are deemed to be out of date, national Government regulations still require planning applications to be determined with a 'presumption in favour of growth'. This means that without up-to-date Local Plan policies the Council would still have the same pressures for growth but would have extremely limited ability to direct and shape that growth, with a risk to design quality and supporting infrastructure.

The Government wants to see Local Plans progressing as a vital means for supporting economic recovery. To allow the plan-making process to continue, the Government has amended some legislation, for example, [the Town & Country Planning \(Local Planning\) \(England\) \(Coronavirus\) \(Amendment\) Regulations 2020](#). The Government has also temporarily relaxed community engagement requirements to encourage greater use of digital consultation methods, although Waltham Forest has felt it important to continue to carry out extensive non-digital engagement during the consultation period.

What impact would the Government's white paper on planning system reform have on the Plan?

If implemented, the Government's proposed legislation would make the Local Plan even more important as there would be less opportunity for the public to respond to schemes at the planning application stage.

However, the Government's proposals are only at a very early stage with limited detail and would require legislation to have effect. From a recent statement (November 2020) made by England's Chief Planner (Joanna Averley), the Council understands that details on next steps for introducing the required legislation on these proposals still need to be worked out and that it would take a couple of years to go through the parliamentary system before being implemented on the ground. The Council intends to start work on a Local Plan Review when the necessary legislation is in place, although the Local Plan does align reasonably well with many of the proposals in the White Paper, including the 'Transformation, Transition and Reinforce' approach.

How have you considered the impact of high-density and high-rise residential development on crime and health?

On crime specifically, Policy 60 seeks to minimise opportunities for criminal behaviour by requiring all forms of new development to incorporate 'Designing out Crime' and Secured by Design standards and requirements. It also seeks to promote safer places through partnership with the Metropolitan Police and other bodies.

Health impacts and development are covered in Chapter 13 of Local Plan Part 1 (LP1), Promoting Health and Wellbeing. Policy 50 sets out a cross-cutting range of benefits, which the Council expect to be provided by development. Policy 51 sets out how larger applications will need to address health inequalities through the submission of Health Impact Assessments, which will be used to scope and target planning obligations. Policy 52 backs up the Council's commitment to making safer places by working with the Police as indicated above and by ensuring that design minimises the potential for crime and anti-social behaviour within development and the wider environment.

As policies are intended to work together as a suite rather than being applied piecemeal, the thrust of the plan involves improving the built environment, adding more green space, reducing and repurposing grey paved space where possible, making streets more active, safer and healthier. A key part of this is the promotion of active travel and the delivery of the 15-minute neighbourhood as a place to live and work rather than being a dormitory near a node in the transport network and otherwise a place of transit rather than a neighbourhood.

Will there be support for local businesses to take on premises in any of the new developments?

Yes – supporting our local economy is a priority for the Council. All arms of the Council – including the Regeneration, Business and Commercial Property teams – are already working closely with local businesses to link them to new spaces. In addition, the plan includes a commitment to work with delivery agencies where possible to ensure that local needs are met.

Of the 52,000 sq m of workspace to be provided by the Plan, much will have a basic level of fit out that makes it accessible to local social enterprises.

How will industrial uses be accommodated in mixed-use developments, particularly where there appears to be a conflict between the industrial operations and residential activity?

The Plan supports, in principle, mixed-use developments. Conversations with existing businesses have told us that they want to be better connected to and more visible within the surrounding residential areas. They are keen to be able to showcase their products with active street frontages and to increase footfall past their premises.

Policies in the Local Plan will help facilitate this, but also mitigate any conflict with residential activity by imposing strict requirements for access and servicing. Industrial uses would still be the primary use of the space but delivering flexible, 21st century workspace helps that can help businesses to grow.

While recognising the positive benefits that could come from mixed-use developments, the Council accepts that mixed use development may not be appropriate in all circumstances or locations. Accordingly, where planning permission is required, Policy 7 (Encouraging Mixed Use Development) sets out criteria for determining whether planning permission should be granted. This includes the location of the proposed development, compatibility with existing, proposed and adjoining uses and most importantly, the character of the local area.

The Plan also supports the '15-minute neighbourhood' – giving residents access to jobs, retail, leisure, education, healthcare and other needs within a short walk or bike ride of their home. This will help reduce traffic and responds to what residents have been telling us are their priorities during and post Covid.

SITE ALLOCATIONS

Will construction work on all 65 sites listed in the Draft Local Plan Part 2: Site Allocations document be happening at the same time?

No. This plan looks ahead to development that might happen spread over the next 15 years and sets out the policy for what would be encouraged if a site was to be redeveloped at some point. It is not a set of proposed schemes.

Some sites in the Draft Local Plan Part 2: Site Allocations document are privately owned - how will those be redeveloped if the Council doesn't own them?

It will still be up to a landowner whether or not they want to redevelop their own site. The Site Allocations documents provides guidance to developers on what the Council would want them to provide on the site regarding land use and broad development principles should these sites come forward for redevelopment plans in the next 15 years.

If a planning application meets all the specifications listed in the site allocation, will it automatically be given planning permission?

No. It will still need to go through the full planning application process, including community engagement, when residents will have the chance to comment on the specific proposed scheme.

What is the difference between the site allocations and the schemes currently submitted for planning applications?

The Site Allocations are not proposed schemes – they are policies that would seek to influence the content of any scheme that might come forward. At the moment, the Site Allocations is a draft for consultation so currently have no legal weight in assessing current planning applications. They are completely separate from any schemes currently coming forward from private developers. You can find details of, and give your comments on, schemes with current proposals on our [Regeneration website](#).

A lot of sites listed in the Draft Local Plan Part 2 are currently occupied by supermarkets, leisure centres or community spaces. What will happen to these essential local facilities?

The Draft Local Plan Part 2 specifies that existing uses should be re-provided. So, for example, if there is currently a leisure centre on a site, the site allocation specifies that there should still be a leisure centre provided as part of any redevelopment.

HOUSING

Where do the housing targets come from?

All London boroughs are required to produce Development Plan Documents that must conform with the London Plan published by the Mayor of London.

The housing target in the Waltham Forest Proposed Submission Local Plan (LP1) is based on the Government's Standard Method for assessing local housing need. This method produces a figure capped at 40 per cent above the average annual housing requirement figure set out in existing policies. Assuming adoption, the London Plan (Intend to Publish version) target for Waltham Forest is 1,264 new homes per year. Applying the Standard Method 40 per cent cap to this results in an annual requirement of 1,770 new homes per year.

How does Waltham Forest define 'affordable housing'? And why can't more of it be social or genuinely affordable housing to rent?

Waltham Forest defines affordable housing in line with the [National Planning Policy Framework](#) as:

Housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions:

(a) Affordable housing for rent: *meets all of the following conditions: (a) the rent is set in accordance with the Government's rent policy for Social Rent or Affordable Rent, or is at least 20% below local market rents (including service charges where applicable); (b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).*

(b) Starter homes: *is as specified in sections 2 and 3 of the Housing and Planning Act 2016 and any secondary legislation made under these sections. The definition of a starter home should reflect the meaning set out in statute and any such secondary legislation at the time of plan-preparation or decision-making. Where secondary legislation has the effect of limiting a household's eligibility to purchase a starter home to those with a particular maximum level of household income, those restrictions should be used.*

(c) Discounted market sales housing: *is that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.*

(d) Other affordable routes to home ownership: *is housing provided for sale that provides a route to ownership for those who could not achieve home*

ownership through the market. It includes shared ownership, relevant equity loans, other low-cost homes for sale (at a price equivalent to at least 20% below local market value) and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision, or refunded to government or the relevant authority specified in the funding agreement.

The proportion of housing required to be of different tenures is set with reference to assessment of the housing needs of different groups. The Waltham Forest Strategic Housing Market Assessment (2017) assessed the ability to afford housing, and offsets this against the supply of affordable housing in the current stock to produce an estimate of how much additional affordable housing is needed.

The Intent to Publish London Plan Policy H6 'Affordable Housing Tenure' states that residential development should apply a split of: a minimum 30 per cent low-cost rented homes and a minimum 30 per cent intermediate homes. Both the GLA Strategic Housing Market Assessment (SHMA) and Waltham Forest SHMA show that there is a significant need for low-cost rental housing. Because of this the remaining 40 per cent affordable housing tenure is expected to be for low-cost rented homes. Delivery of low-cost rental housing will be the priority unless there are exceptional circumstances.

[Will any new houses be built, or just flats?](#)

There will be some new houses built in the Local Plan Period of 2020 – 2035. However, higher population projections mean that higher density schemes will help Waltham Forest meet its centrally imposed housing growth delivery targets.

[Why are the South and Central areas of the borough earmarked for the greatest proportion of the new housing?](#)

The South and Central areas of the borough are earmarked for the greater proportion of development over the 15 years of the Plan period for a number of reasons. There are generally a higher proportion of sites that are coming forward in the South and Central areas of the borough. It is also generally better served by public transport networks, reducing car dependency, which means that more sustainable development would be expected to come forward, aligned with the Council's Climate Emergency policies. Development in the North of the borough will happen at lower densities (a draft allocation of 4,000 homes from a borough total target of 27,000) as there is greater dependency on car use due to the area's topographical and suburban characteristics.

Under the last Local Plan Core Strategy (2012), what proportion of the required housing target was built?

The London Plan 2011 minimum ten-year target was for the delivery of 7,600 new homes from 2011-2021. We have delivered 6,438 new homes, 85 per cent of this target, with one year remaining. We have delivered 94 per cent of the accumulated target of 6,840 new homes.

The London Plan 2015 minimum ten-year target was for the delivery of 8,620 new homes from 2015-2025. We have delivered 4,452 new homes, 52 per cent of this target in the first five years (2015-2020). We have delivered 103 per cent of the accumulated target of 4,310 new homes since 2015.

ENVIRONMENT

How does the Plan respond to the Climate Emergency?

Since the 2019 draft version of the local plan, and public consultation, policies in the Plan have been updated to reflect the Climate Emergency.

In the Local Plan Part 1, Chapter 18 'Addressing the Climate Emergency' sets a clear strategy for mitigating the impacts of climate change. This is also a strong thread running through all of the policies of the Plan. For example, how we mitigate air quality and recreational impacts on the Epping Forest, encouragement of active travel, and the concepts set out by the 15-minute neighbourhood all link back to addressing the climate emergency.

Many of the [Evidence Base](#) documents also address issues of environment, sustainability and the Climate Emergency.

Will you be chopping down trees? In particular on open land and green spaces such as Larks Wood?

Where possible existing trees will be retained, not just those with tree protection orders. Policy 82 of the Local Plan also sets out our commitment to planting more trees in the Borough. The Local Plan seeks to extend our Green infrastructure network and commits to urban greening within development with the overall aim of greening the borough.

As Larkswood involves a site on which there is a community application to designate Local Green Space it would not be appropriate to comment further on this site. There are no proposals to build on the Larks Wood itself.

TRANSPORT

How can public transport be improved or increased in order to cope with the increase in residents in the strategic areas?

There has been a rolling improvement to public transport in the Borough over the past few years. There is now increased capacity on the Victoria Line due to upgraded signalling and new trains, which allow increased frequency of service. The Chingford to Liverpool Street Line has recently had its service increased and has been equipped with new state-of-the-art trains; these have increased capacity, a smoother ride, air conditioning and USB charging points. Many buses running in the borough are now fully electric and the frequency of services has improved.

New station entrances at Leyton and Walthamstow Central are key proposals in the South and Central Growth areas, and step-free access to all stations is a Council priority, specified in the Draft Site Allocations for station sites.

Over the next few years, Crossrail1/The Elizabeth Line is expected to increase capacity at Leyton by 15 per cent when it opens, and we are also proposing a new station at Ruckholt Road.

What does PTAL stand for?

Public Transport Accessibility Level. It is graded from 6 (high) to 1 (low). It is, in essence, an index of the ease with which a journey by one or more means of public transport can be made from a location to one or more destinations and service frequency at those stops. The result is a grade from 1–6 (including sub-divisions 1a, 1b, 6a and 6b), where a PTAL of 1a indicates extremely poor access to the location by public transport, and a PTAL of 6b indicates excellent access by public transport.

An explanation of other planning terms and acronyms can be found in the [Glossary](#).

HEALTHCARE

How are you planning to increase access to GPs and other local healthcare?

Health facilities are considered in partnership with the NHS and Clinical Commissioning Group which takes account of demographics etc. Work is then done to provide suitable facilities on appropriate developments.

The Infrastructure Plan looks at primary healthcare - GPs – intermediate healthcare, social care and the rising costs and needs; and we also look at mental health. There are around 40 GPs in the borough, a lot of those privately owned businesses. The NHS want to see minimum GP size of 10,000 residents – a lot of our GPs have lists of around 2-3,000 residents. This means we will need to consolidate a lot of our GP practices.

With regard to social care, the council owns three care homes and we are looking at a long-term strategy for those.

One of our big problems in the borough is that a lot of our GP estate is privately owned. 51 per cent of the Borough's GPs are in old converted residential properties. We need to use these larger regeneration schemes to leverage funding to deliver 21st century healthcare.

EDUCATION

How will you provide school places for the growing population? Have you identified any sites for new schools?

Due to a significant growth in demand, since 2007, there have already been 36 permanent forms of entry added to the primary phase through expansion of existing schools, and ten forms of entry have been added to the secondary phase in the past five years.

Primary demand has reduced over the past three years meaning there are currently surplus places. It is estimated that no additional primary places will be required until at least 2030. When the time comes, there are options to expand within existing schools.

The same is true in the secondary phase, and therefore no new sites are currently being sought since they are unlikely to be needed.

The Council does not have the powers to build new maintained schools – these would have to come forward in the form of Academies, however, the Council will continue to engage positively with groups or organisations seeking to explore or establish new provision in the Borough.

Will schools be built in the same strategic areas as new housing, or might children have to travel to other parts of the borough to go to school?

The national guideline is that a primary aged pupil should travel no further than two miles; in Waltham Forest the majority of pupils in fact currently travel much less than a mile. This will continue in the future wherever possible.

Existing schools close to areas of growth will be expanded to meet demand if the excess places are not sufficient. In addition, the Council is exploring the potential to provide new school facilities in Leyton Mills (as per Local Plan Part 2: Draft Site Allocations).

TALL BUILDINGS

What is a 'tall' building? And what makes one appropriate or not?

The recommended ranges of heights are set out in Table 14.1 in Policy 56 (Taller and Tall buildings) of Local Plan Part 1. This uses four categories of tall buildings identified in the Characterisation and Intensification Study (2019): Category A: 6-9 storeys; Category B1: 10-13 storeys; Category B2: 14-17 storeys; and Category C: more than 18 storeys.

The categories begin at six storeys to reflect the impact that such a height could have on the generally low-rise nature of some parts of the Borough where six storeys would be taller than surrounding buildings. Above that, the categories reflect the distinction in architecture found between existing examples in the Borough. When determining the suitability of tall buildings in Waltham Forest it is important to consider the different impact that each category of height will have, namely categories over 14-storeys require a markedly different architecture.

The Skyline Study says taller buildings may be suitable if they are of 'exceptional design quality'. What does that mean? And how would you enforce it?

The Plan embeds exceptional design quality in all new development in the borough from the outset. A development that has 'exceptional design quality' would be one that responds appropriately to its immediate environment. It would need to meet standard living and communal space requirements and contribute to the safety and wellbeing of its occupants and other residents in the borough.

The Plan also requires new development to mitigate the impact of climate change by working towards Net Zero carbon emissions throughout the whole of a building's lifetime, from sustainable construction techniques to using technologies such as district heating and cooling systems.

Many of the principles that contribute towards exceptional design are already embedded in the national Building Regulations, for example regulations regarding energy efficiency, access and fire performance.

Any proposal for redevelopment of a site would need to go through the planning application process, at which point designs could be scrutinised by officers and residents.

Contact

For any further information about the Waltham Forest draft Local Plan:

Email: planning.policy@walthamforest.gov.uk

Post: Planning Policy Team, Magistrates Court, Waltham Forest Council, Waltham Forest Town Hall Complex, Forest Road, London E17 4NX.