



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

**RESPONSE TO FURTHER MATTERS, ISSUES AND
QUESTIONS**

**MATTER 2: VISION, STRATEGIC OBJECTIVES,
SUSTAINABLE DEVELOPMENT AND SCALE OF
GROWTH**

January 2023

MATTER 2: VISION, STRATEGIC OBJECTIVES, SUSTAINABLE DEVELOPMENT AND SCALE OF GROWTH

The Scale of Housing Growth

2.1 The SA Addendum (LPE36.1) tests the sustainability implications of the 10-year target for net completions in Waltham Forest set out in the London Plan (1264 dwellings).

Is the Topic Paper's conclusion (paragraph 3.7.2.5), that Option 1 (27,000 dwellings) remains the preferred option, reasonable and justified by the evidence?

The Sustainability Appraisal (SA) assessment of Option 1 identifies potential significant positive effects with regards to housing delivery against Objective SA1 (Meet local housing needs through the provision of a range of tenures and sizes of new dwellings), a potential minor positive effect with regards to air quality, against Objective SA9 (Improve air quality), and uncertain for flood risk against Objective SA11 (Reduce the risk of flooding and improve resilience to climate change). Through Policy 93, Managing Flood Risk, the Plan establishes the measures by which flood risk will be managed and mitigated, including a requirement for site Flood Risk Assessments to demonstrate that proposals will be safe from flooding and the impacts of climate change for their lifetime, including through flood-resistant design and construction and appropriate emergency planning. No potential significant negative effects are identified in relation to Option 1 in the SA. As such, the Topic Paper's conclusion (paragraph 3.7.2.5), that Option 1 (27,000 dwellings) remains the preferred option is reasonable and justified by the evidence, including the Updated Housing Trajectory (LPE31), the Updated Five Year Land Supply Statement (LPE32), the Sequential Test Statement (LPE34) and Air Quality Study 2 (AQS2) (LPE35).

Option 2 is not favoured because it fails to deliver against the borough's identified housing needs and, resulting in a potential significant negative effect for Objective SA1. It could perform similarly to Option 1 with regards

to air quality, but based on the evidence available, there is uncertainty that it would result in the same significant reduction in trip generation (and therefore potentially positive effects on air quality) that Air Quality Study 2 (AQS2) (LPE35) shows for Option 1. Please see the Council's response to question 1.10 for more detail relating to air quality.

For detailed responses relating to flood risk, please refer to the Council's responses to questions 5.1-5.6. Meaningful and proportionate consideration of flood risk has been carried out in support of the Plan. The application of the Flood Risk management hierarchy and Strategic Flood Risk Assessment throughout the plan-making process provides sufficient evidence to support the policies and the proposed spatial and growth strategy. The exception test to be undertaken on the allocation of sites through Local Plan 2 (LP2) will also demonstrate the sustainability merits of each allocation within Flood Zones 2 and 3.

In conclusion, Option 1 remains the preferred policy option, as it goes as far as possible to meet the identified need for new homes in the borough, whilst also securing high quality design, protecting and enhancing the character of local areas, providing new and improved green spaces and public realm, responding to the climate emergency, including improving air quality and significantly reducing flood risk, as well as creating safer spaces, reducing fear of crime, maximising the number of local jobs and employment space, and delivering a whole range of community infrastructure, including health facilities, a new hospital, public transport/station improvements, facilities for young people and new cultural amenities.

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?

The proposed change to the Plan period does not affect the policies of the spatial and growth strategy outlined in the plan, as the conclusions reached in the key evidence supporting are largely unchanged. Commentary on the key evidence base is provided in Table 2.2 below.

As the plan period is proposed to be shifted to cover a 15-year period from adoption rather than extended, it is not considered that the overall scale of housing growth should be altered. The Council has comprehensively reviewed the housing supply evidence which informs the targeted level of housing growth and considers that it is appropriate to retain the 27,000 homes target, as it is shown to be deliverable and goes as far as possible in meeting identified housing need.

In light of national policy requiring that local plan policies are reviewed at a minimum every five years, the Council considers that there is no requirement for further evidence to justify the application of the plan’s targets to the years covered by the amended plan period.

Table 2.2 – Review of key evidence base document and coverage

Evidence Base Document	Document reference period	Commentary
EB4.1 Strategic Housing Market Assessment (2019)	2014-2039	No implication, the study covers the whole period.
EB6.1 Employment Land Study (2019)	2018-2035	The study makes use of projected growth in jobs based on GLA forecasts to 2035. The requirement for c.52,000 sqm of floorspace is identified from these forecasts. The Plan seeks to retain the existing industrial capacity in both B8 and B2/Class E) iii, despite a slight projected loss of

		sectors driving demand for B2/Class E) iii space over the period to 2035. The plan's policies are protective of industrial and employment land. Providing for a higher level of economic need than previously identified will be possible without changing the approach.
EB6.0 Employment Land Audit (2021)	n/a	The document provides a baseline assessment of the presently existing composition of each site in terms of floorspace measurements. The assessment of intensification potential is not with reference to a particular timeframe over which the potential capacity may be realised. As such, there is no implication for the Plan period.
EB2.1 Character and Intensification Study (2019)	n/a	The study provides recommendations to guide a character-led approach to intensification. This guidance is not impacted by rolling forward of the Plan period.
EB6.2 Growth Capacity Study (2018)	2018-2033	The study covers 15 years, identifying and providing an assessment of when sites may be delivered. The study was commissioned as an aid to the development of the Local Plan, particularly in relation to the draft London Plan small sites policy. Beyond 2033, longer term capacity can be guided by the site-specific work on Site Allocations being developed through Local Plan 2 and presented in the Updated Housing Trajectory (LPE31), Updated Five Year Housing Land Supply (LPE32) and other evidence base documents including the GLA Strategic Housing Land Availability Assessment (SHLAA).
EB4.2 Gypsy and Traveller Accommodation Assessment (2020)	2018-2033	The need which is identified falls within the first 5 years of the plan period. There is no future formation identified. Rolling forward the Plan period will not have an impact on the conclusions of the study.
EB2.13 Archaeological Priority Areas Appraisal (2020)	n/a	The appraisal assigns parts of the borough to tiers of archaeological significance and potential based on information about presence or potential for archaeological assets or interest. There is no impact of rolling forward the Plan period on its findings.
EB8.1 Waltham Forest Green Belt and Metropolitan Open Land Study 2015	n/a	The study assessed the contribution of the Borough's Green Belt and MOL to the characteristics and purposes of the designations at the point of undertaking (2015, with 2019 update). There is no

		impact of changes to the plan period on its findings.
EB7.1 Town Centres and Retail Study (2019)	2019-2035	The study provides a qualitative and quantitative needs assessment to 2035 based on a variety of forecasts ranging in date from 2016 to 2019. Rolling forward the Plan period would not lead to changes to the study which would require altering the policy approach.
EB5.1 Playing Pitch Strategy (2020)	2017-2033	Population projections form a critical part of the study, being used to model the need for provision across sports. The evidence reflects the current position now and in the foreseeable future. This is regularly monitored and reviewed. Position updates will be undertaken in accordance with 5-yearly reviews of the Local Plan.
EB11.1 Cultural Infrastructure Study (2020)	n/a	The study does not provide need figures or recommendations which are tied to a fixed period.
EB8.4 Open Space Needs Assessment (2019)	2017-2035	The study proposes quality standards based on levels of provision per capita. Rolling forward the Plan period could increase projected population and therefore the impact on open space standards. The overall policy approach however will not be compromised. As with the Playing Pitch Strategy (EB5.1), this is regularly monitored and reviewed and position updates are to be undertaken in accordance with 5-yearly reviews of the Local Plan.
EB9.1 Strategic Flood Risk Assessment – Level 1 (2018)	n/a	The study provides an overview of the risk of flooding from all sources. This is not linked to a particular Plan period, and so rolling forward the Plan period will not have an impact on the evidence provided by the study.
EB9.2 Strategic Flood Risk Assessment Level 2 (2021)	n/a	The Level 2 SFRA considers the detailed nature of the flood characteristics within a flood zone for all sites identified as requiring further assessment in relation to the level of flood risk. There is no impact of changes to the Plan period on its findings.
EB10.1 Waltham Forest Strategic Transport Review	n/a	The review brings together the studies, strategies and programmes that have been produced to date to understand how the existing transport network operates, and identify constraints and opportunities for future work, with particular consideration of opportunities to reduce the environmental

		impact of transport within the Borough. There is no impact of changes to the Plan period on its findings.
--	--	--

The Distribution of Housing

2.3 The Topic Paper (LPE30 pages 21-22) sets out further changes to the proposed distribution of housing growth set out in the Plan's Policies 4, 9, 10 and 11.

Are these changes justified and in general conformity with the London Plan?

The further changes proposed in the Topic Paper LPE30 are reflective of adjustments made as a consequence of shifting the plan period from 2020–2035 to 2023/24 – 2037/38 to cover a minimum 15-year period from the anticipated adoption date, and a small number of changes arising from updates to site capacity which have been received since the submission of the Plan. The approach to apportioning growth has been to weight the allocation of the target of 27,000 new homes according to identified capacity.

The Mayor has previously supported the strategic approach to delivering growth over the plan period, noting:

“The process by which the draft Plan drills down to ever increasing spatial levels of detail follows a rational and methodological approach which is welcome and reflects the fact that the South of the borough is a sustainable location for development, benefitting from excellent public transport services and a more urban setting”¹

The Council considers that the adjustments made do not substantially change the proposed distribution of housing growth, with a significant proportion of the growth to be located in the South and Central areas of the borough (a reduction from 16,000 to c.15,000 and increase from 7,600 to 8,700 new homes respectively). As the approach to distribution of housing growth is the same, the plan should be considered to remain in general conformity with the London Plan, and to be justified in being updated to reflect the best available

¹ Mayor's Statement of general conformity with the London Plan, 14 December 2020, available in [KD6.2 Copies of Representations made under Regulation 20.](#), page 272

capacity evidence. The Plan locates growth predominantly in Strategic Locations which is aligned to direction from the London Plan in Policy GG2 – Making the best use of land, which encourages development to take place in Opportunity Areas and sites within and on the edge of town centres in particular.

Two Statements of General Conformity with the London Plan have been published in support of examination at LPE27 and LPE38. Amendments to the Plan period are not considered to impact their conclusions.

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?

In summary, the scale and distribution of growth is considered to be in general conformity with the London Plan. As previously discussed, further to Direction 8 of the Secretary of State's Letter modifying 0.0.21 of the London Plan, boroughs are encouraged to consider whether they are able to exceed their housing target [from the London Plan].

The revised text of London Plan, paragraph 0.0.21, reads:

'Therefore, boroughs do not need to revisit these figures as part of their Local Plan development unless they have additional evidence that suggests they can achieve delivery of housing above these figures whilst remaining in line with the strategic policies established in this Plan.'

The further evidence submitted in support of the Plan, including the Updated Housing Trajectory (LPE31), Updated Five Year Housing Land Supply (LPE32), Suitable Alternative Natural Greenspace (SANG) Strategy (LPE33), Flood Risk Sequential Test Statement (LPE34), Air Quality Study 2 (AQS2) (LPE35), demonstrates that a higher level of delivery is achievable, whilst remaining in line with the strategic policies of the London Plan. It therefore holds that a requirement based on that evidence is in general conformity with the London Plan, and is sound. The Council considers that the additional evidence clearly demonstrates that the Local Plan's housing requirement is justified, that the spatial strategy will direct planned growth to the most appropriate and sustainable locations, and that planned growth in Waltham Forest will have positive impacts on the Epping Forest Special Area of Conservation.

It is also worth noting that the proposed housing target steps up over the Plan Period. It is aligned with the ten year London Plan target of 1,264 new homes per year until 2026/27. After this, it steps up in accordance with identified deliverable supply, resulting in an average annual target, over the whole 15-year Plan Period, of 1,800 homes per year. As such, Local Plan 1 (LP1) is in full alignment with the London Plan for eight of the ten years that the London Plan minimum target is set for. By the point at which identified housing supply in Waltham Forest will exceed the London Plan target, the London Plan will already be subject to review informed by an updated understanding of site capacity across all boroughs.

No further main modifications to those set out at 3.15 of LPE30 - Examination Stage 2 Topic Paper are proposed.