

WALTHAM FOREST LOCAL PLAN PART 1

EXAMINATION IN PUBLIC

STAGE 2 HEARINGS 7-10th March 2023

Council's Opening Statement

Welcome and thank you all for joining us here today for these Stage 2 hearings on the examination of Waltham Forest's Local Plan.

We're delighted to be able to hold these hearings in person here at the **beautifully restored Waltham Forest Town hall**, set in the transformed open space of **Fellowship Square outside**, with the **hive of construction activity** all around us delivering, on this site alone:

- over 430 new car free homes, 50% of which will be affordable,
- a new civic building with workspace, new retail, a new restaurant, and a new nursery,
- a new cultural destination at the Assembly Hall next door,
- new play space, public realm and biodiverse landscaping; and a
- new wetland sustainable urban drainage and Suitable Alternative Natural Greenspace investment in Chestnuts Fields behind us.

This **one site alone** is a great illustration of all that the new Local Plan can deliver across the rest of the borough - through the **underlying approach of** directing planned growth – which will deliver the **homes, workspace, open space and infrastructure** the borough needs - **to previously developed sites** that are not currently efficiently used, that are unmanaged, that are dominated by swathes of hard surfaced car parks, or out of town, out of character retail parks and supermarkets – we can deliver well designed, well landscaped, green and biodiverse new places that play their part in fighting the climate emergency, sit at the heart of 15 minute neighbourhoods, improve air quality across the borough and reduce the risk of surface water flooding.

Throughout this week- as we work through the additional evidence and further clarifications required following the Inspectors' post hearings letters of May last year, we will show how this will be achieved.

Briefly, I'd like to take a couple of minutes to summarise each of those workstreams, and set out the evidence we'll be delving into this week.

1. **Firstly, the Inspectors asked us to update our air quality study in accordance with Natural England's requirements and liaise with Natural England, Conservators of Epping Forest and other organisations as necessary.**

In response, we produced Air Quality Study 2, with support of Air Quality specialists **WSP**, who I'm pleased to say are with us today to discuss the results in more detail. AQS2 shows clearly that our **spatial approach to delivering planned growth** - specifically through directing car free, well managed, well designed development to previously developed, car dominated, unmanaged sites, and promoting active travel, like walking and cycling, - will result in **significant reductions** in vehicle traffic across the borough, thus **improving air quality for everyone**.

Specifically, AQS2 shows that, as set out in the updated Habitats Regulations Assessment, there will **be no adverse effects on air quality in the Epping Forest Special Area of Conservation**. Traffic on most of the **roads within 200m** of the Epping Forest Special Area of Conservation will be reduced – and on the few roads where there will be tiny increases, these will be so small as to be insignificant. **Natural England** have reviewed AQS2 and reached the same conclusion, that the Waltham Forest Local Plan will not result in any significant effects on Air Quality in Epping Forest.

2. **The Inspectors also asked us to liaise with Natural England, the conservators of Epping Forest and other organisations as necessary to provide further clarifications of the capacity, quality and deliverability of proposed Suitable Alternative Natural Greenspaces to mitigate recreational harm on Epping Forest special Area of Conservation.**

In response, and again in close collaboration with Natural England, we produced a new Suitable Alternative Natural Greenspace Strategy that shows:

- a) how many visitors Suitable Alternative Natural Greenspace in Waltham Forest would need to attract in order to avoid recreational pressure in the Special Area of Conservation as a result of the planned growth that we need;
- b) The sites where these visitors could be accommodated – as agreed with Natural England
- c) The investment and interventions needed in these spaces in order to ensure that visitors are attracted to them AND
- d) And a full suite of monitoring measures to make sure the strategy is a success.

The interventions proposed range from transformative regional scale projects, - like opening up the semi natural open space at Banbury reservoir, to smaller scale, more localised green infrastructure projects plugging gaps across our green infrastructure network. In this way, whilst the methodology applied is bespoke to the urban environment of Waltham Forest, the foundations on which the strategy builds are well established – similar in many ways to the approach taken at Dorset Heaths for example.

The new Suitable Alternative Green Space Strategy will be embedded in a new Green Spaces and Places SPD that will be visionary and far reaching in its ambition to deliver a high quality, well connected network of green spaces across the borough.

Together with other agreed measures - including the Strategic Access Management and Monitoring partnership – which we are already collecting substantial financial contributions towards - and policy requirements for site specific Habitat Regulation Assessments – we can fully justify the Plan level Habitat Regulation Assessment conclusion that there will be no adverse effects from recreational harm on the Special Area of Conservation as a result of the Waltham Forest Local Plan.

As with the air quality study, Natural England have worked closely with us on the strategy and new monitoring indicator - and confirmed they **support** the conclusion of our updated Habitats Regulation Assessment. We also have joint letters signed with the City of London Corporation (Conservators) and Lee Valley Regional Park authority to confirm their support for the collaborative approach we have taken.

3. Thirdly, the Inspectors asked us to update our housing trajectory in relation to completions, commitments, timescales for delivery and evidence of consultation and to update the evidence behind the five-year housing land supply position.

We completed a forensic review of our housing trajectory and updated it accordingly – including taking account of our proposal to shift the Plan Period to 2023-2038.

This review included updating the trajectory with all recent planning decisions and resolutions to grant planning permission – which it is worth noting, give a healthy pipeline of around 8,000 new homes – over half of which have already commenced construction on site. (Meaning that well over 20% of our 27,000 homes target already has planning permission)

We also carefully reviewed all planning applications that are still under consideration, all suitably well- advanced pre application discussions and the wealth of council-led masterplanning and feasibility work referred to in the topic paper at LPE30. We also consulted developers, site owners and site promoters of sites to confirm their progress towards making a planning application and expectations around delivery and phasing.

As a result, we can demonstrate with confidence, that a deliverable five-year supply of housing land will be available at the point of adoption of the Plan, and that this has a reasonable prospect of being maintained across the Plan period.

4. The Inspectors also asked us to formalise proposed changes to the Blackhorse Lane Strategic Industrial Location.

And thanks to close collaborative working with the GLA - we have now agreed and signed off a London Plan complaint 2 stage industrial masterplan for Blackhorse Road. This means that we can, as recommended by the Inspectors, formalise the

proposed changes to the Blackhorse Road Strategic Industrial Land accordingly in Local Plan Part 1.

5. The Inspectors asked us to undertake a strategic, borough-wide Sequential Flood Risk Test.

So we prepared a robust, evidence led sequential test, in full accordance with national policy and guidance. This has been reviewed by the Environment Agency, who say that it “demonstrates how the Local Plan is consistent with national flood risk policy, and correctly applies the sequential test to site selection”.

At this point I’d just like to take a minute to highlight the benefits of the Local Plan’s spatial strategy again – this time in relation to surface water flooding.

Developing hard surfaced sites with well landscaped schemes that incorporate Sustainable Urban Drainage solutions to achieve greenfield run off rates will have enormous benefits across the borough. Benefits that we are already seeing through schemes that have recently been granted planning permission – like Whipps Cross, where we will see a 98% reduction in surface water run off, and Lea Bridge Station sites, where a comprehensive package of flood mitigation measures, includes significant net increase in flood storage, over and above that needed for the scheme itself, to benefit the wider local area.

6. The Inspectors asked us to evidence and justify the revised tall buildings policy including the areas mapped and identified as appropriate for tall buildings.

In response, we have set out all of the evidence that justifies our Tall Buildings policy. It starts with the Character and Intensification Study, which establishes the character led approach to intensification and the categories of “reinforcement”, “transition” and “transformation”. We went on to provide a wealth of design -led evidence in the form of council – led feasibility studies, masterplans and area frameworks, and our borough-wide, strategic Skyline study.

The evidence for our tall buildings policy and the sites identified as potentially suitable for tall buildings also includes review and assessment of Townscape and Visual Assessments undertaken in support of tall buildings that already benefit from planning consent in the borough, or have reached an advance stage of planning or pre application discussions.

The new Local Plan is not the catalyst for tall buildings in Waltham Forest. Both the NPPF and the London Plan set a policy context within which tall buildings of the right design quality, and in the right locations can and should be supported. Tall buildings are already being proposed and built in Waltham Forest. The new local plan provides greater control over where these tall buildings will be supported, and what will be expected of them in terms of design quality.

We proposed to modify the policy to ensure conformity with the London Plan, but the essential, character-led, local nuance that we have always sought to capture remains at its heart – not just through the tall buildings policy itself, but also through the new “Building Heights” policy.

The result is a well evidenced policy that is appropriate for Waltham Forest, and clearer for both local communities and developers. The design tests for tall buildings have been strengthened, giving greater confidence than ever that tall buildings in the borough will be of the highest quality and will be found in the most suitable and sustainable locations, where they will make a positive contribution to local character.

7. **Finally, the Inspectors asked us to undertake further Sustainability Appraisal work to assess other reasonable alternatives, including London Plan housing targets.**

Informed by all the evidence I have described this morning, we undertook this further Sustainability Appraisal work, including assessing the impacts of assuming an extension of the London Plan housing target for Waltham Forest beyond 2029 and across the whole Plan period. By extension of course, this would also be likely to mean delivering **fewer of the wider benefits** that well planned and designed growth brings, including new and enhanced open space, new community infrastructure, reduced traffic, greater biodiversity and greater surface water flood resilience.

This further Sustainability Assessment has enabled us to reach the conclusion with greater confidence than ever, that the delivery of 27,000 homes remains the preferred option for Waltham Forest. The Local Plan, and the evidence we will examine this week, shows that we can deliver 27,000 new homes – going as far as possible to meet our objectively assessed housing need - whilst also:

- securing high quality design,
- protecting and enhancing local character,
- providing new and improved green spaces and public realm,
- responding to the climate emergency,
- improving air quality,
- reducing flooding risk,
- maximising opportunities for local jobs and employment floor space; and
- delivering a whole range of infrastructure – including new health facilities, active and public transport improvements and new cultural amenities.

The new Local Plan will deliver for Waltham Forest on all these counts. We're immensely proud of the incredible amount of hard work the team we've done since last May, and we're very much looking forward to discussing it all with you this week.

Thank you.

