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Our ref: 66164/01/SSL/IB/26984779v1

Dear Sir/Madam

Waltham Forest Local Plan Part 1 – Main Modifications Consultation

This consultation response has been prepared by Lichfields and is submitted on behalf of Prologis UK Limited (“Prologis”) in the context of their ownership interest at Cork Tree Retail Park, Chingford, E4 8JA (the “Site”). Lichfields are, and have been, representing Prologis at the Examination in Public (EiP) of the Local Plan Part 1 (LPP1), including submitting written representations to the Stage 2 consultation in January 2023 and participating on their behalf at the hearing sessions in March 2023.

This letter provides a formal consultation response to the schedule of Main Modifications (MM). This consultation relates to the regulatory requirements to make Local Plan Part 1 sound and/or legally compliant, as agreed by the Planning Inspectors and the Council. These representations do not therefore seek to repeat the background or content of representations previously submitted to the EiP, and focus solely on legal compliance and the tests of soundness of the following individual MMs which are of most relevance to the Site.

MM47

MM47 relates to Policy 25 of the LPP1, which seeks to support opportunities for employment growth and protect the borough’s Strategic Industrial Locations (SIL) capacity. The most substantive proposed change to the policy is Part D, which adds the following text:

“Promoting industrial intensification through site allocations in Local Plan 2, the Industrial Intensification Supplementary Planning Document (SPD) and the subsequent development of industrial masterplans (in line with Policy 30 - Industrial Masterplan Approach and London Plan (2021) Policy E7) to facilitate the intensification and uplift of industrial capacity and the maintenance of existing SIL capacity.”

The London Plan (2021) highlights the importance of securing and enhancing strategic provision in SILs, particularly in north London in the Upper Lee Valley, and Policy E7 – inter alia – requires

Development Plans to be proactive and consider the potential to intensify industrial activities on industrial land to deliver additional capacity.

It is therefore considered that the proposed modification is necessary to bring the plan into general conformity with strategic planning policy and forms part of a justified and effective strategy to ensure the borough's employment land needs are met in full.

MM48

MM48 seeks to include additional supporting text to Policy 25 of the LLP1, as discussed above. The new text sets out guidance to deliver industrial intensification across the designated sites, specifically at the North Circular Strategic Location and around the Lea Bridge and Leyton Strategic Locations. It also reiterates that on SIL, the supply of floorspace which is protected as SIL must be maintained, and where possible increased.

Prologis support this additional text, which is considered to be fully justified and effective in ensuring that the stock of SIL designated floorspace is retained in the most appropriate locations. The proposed designated sites represent a strategic, plan-led decision to better utilise the borough's supply of industrial land to meet the identified economic floorspace need. The additional text will help to support this process and is consistent with both strategic (London Plan Policies E5, E6 and E7) and national planning policy (NPPF Para 82).

MM49

MM49 relates to proposed changes to the submission policies map, showing the modified industrial and employment locations across the borough. As shown in the figures appended to this letter (see Annex 1), the changes comprise the re-designation of Cork Tree Retail Park from a Locally Significant Industrial Location (LSIS) to a Strategic Industrial Location (SIL) (site reference SIL 2), alongside the re-configuration of Blackhorse Lane (site reference SIL 4), with sections to be re-designated as LSIS.

As set out in detail in the previous representations submitted to the Stage 2 consultation in January 2023, this modification is justified by robust evidence and necessary for soundness to ensure that SIL capacity is maintained across the borough. It also reflects the GLA Statement of General Conformity (September 2022) which confirmed that the proposed change (upgrading Cork Tree Retail Park to SIL in parallel with the re-designation of part of the Blackhorse Lane SIL as LSIS) is necessary to bring LPP1 into general conformity with the London Plan. Cork Tree Retail Park is located in an important area of employment, in proximity to the adjoining SIL at Hall Lane as well as the SIL site south of North Circular Road. It is currently underutilised and benefits from direct access to the North Circular via Hall Lane (A1009), making it a logical and suitable location that is attractive to industrial occupiers. Its SIL designation therefore aligns with the setting and character of the surrounding area and objectives to make the most of strategic land assets, connectivity, and strong market context.

MM50

MM50 seeks to modify Policy 26 of the LLP1, which sets out the specific uses that will be acceptable on SIL land, as well as certain requirements for new development on SIL land. Primarily, the changes simply bring the policy in line with London Plan Policy E4 (Part A), to ensure that that the list of

acceptable industrial uses is consistent in approach. In addition, MM50 proposes to include additional policy text as follows:

“B. New development will be supported on SIL where it... iii. Provides either the full replacement or the intensification of existing industrial capacity. Landowners should, where appropriate, work with landowners of adjacent sites in order to make the most efficient use of land.”

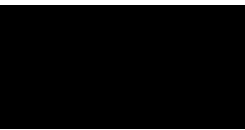
Similarly, this proposed modification will ensure that the stock of SIL is retained and contributes to the Local Plan target to deliver an increase in employment capacity. LBWF’s employment evidence base, including the ELS (2019) and the ELA (2021) confirms that there are limited opportunities to create additional capacity within the borough without a strong focus on redevelopment and intensification of existing employment sites. Policy 26, as modified by MM50, therefore sets out a justified and appropriate strategy to secure large scale industrial intensification on SIL sites, in accordance with the London Plan (2021).

Summary

In summary, and as the sole landowner of the Site, Prologis fully support the principle of re-designating Cork Tree Retail Park as SIL and its future use for industrial purposes, as proposed by the Main Modifications consultation. We consider the Site’s SIL designation to be sound and justified by the borough’s employment evidence base, in general conformity with the London Plan, and entirely appropriate for the existing and forthcoming circumstances of the Site.

The general approach in respect of addressing employment land needs, as set out by the proposed main modifications discussed above, are in accordance with the requirements established under Paragraph 35 of the NPPF and the associated tests of soundness. They accord with the previous representations and the comments made during the examination, both by Prologis and the GLA, and will strongly support LBWF in meeting its (revised) need for SIL across the borough. Fundamentally, the Site will help to deliver employment opportunities in a well-connected strategic and sustainable location, which aligns with the key principles and objectives of the emerging LPP1 and NPPF.

Yours faithfully



Adam Donovan
Planning Director
BA (Hons) MPlan MRTPI

Copy Caroline Musker, Prologis
 Simon Perks, Prologis

Annex 1: Strategic Industrial Locations Map – Submitted vs Modified

Figure 3 Submitted Strategic Industrial Locations Map

Key
Strategic Industrial Locations

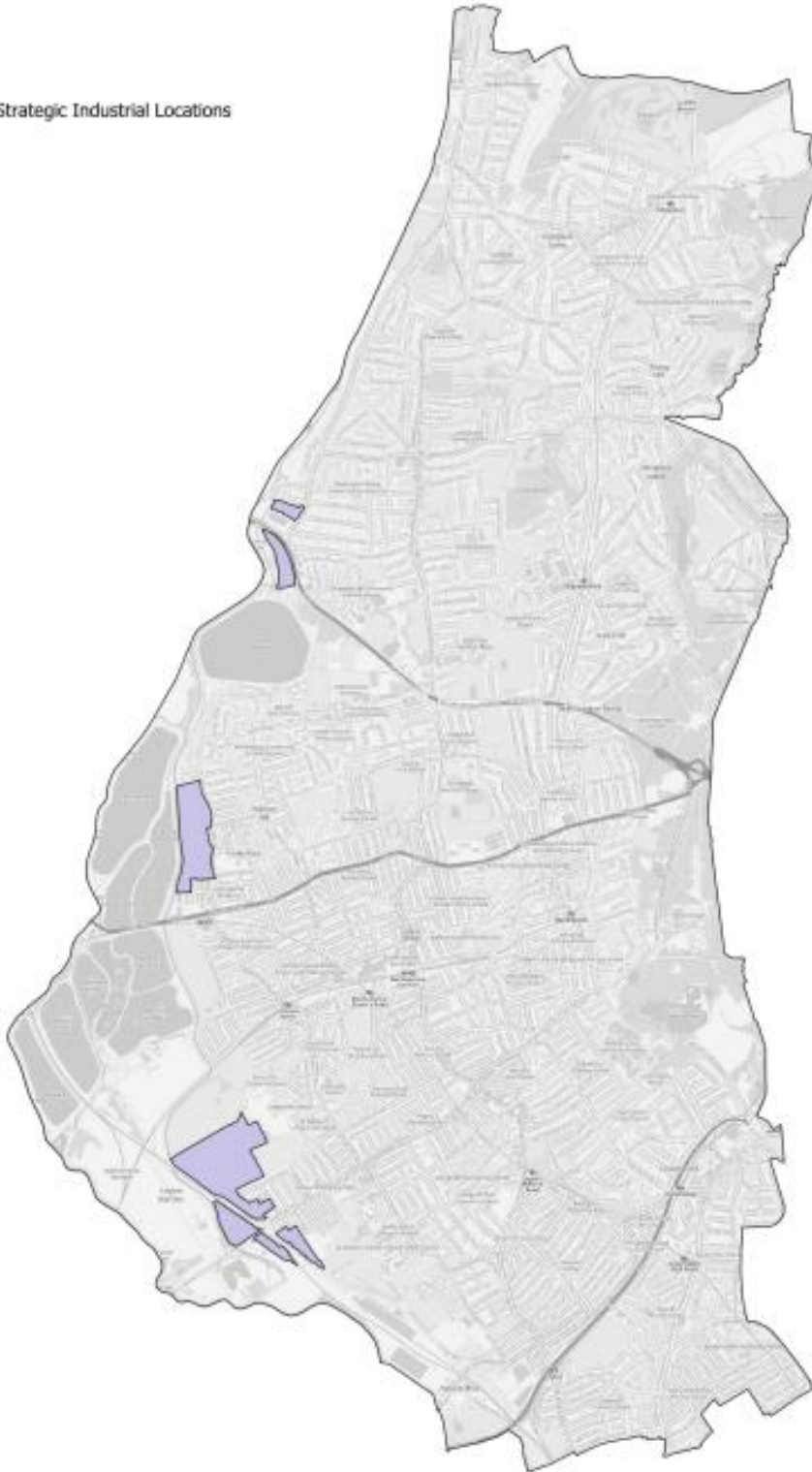



Figure 4 Modified Strategic Industrial Locations Map

Key

 Strategic Industrial Locations

