

20 September 2023  
Representation Letter - Main Modification 200923 200923



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Dear Sir/Madam,

## **WALTHAM FOREST LOCAL PLAN PART 1 (MAIN MODIFICATIONS) REPRESENTATION BY STONECREST MARBLE LTD/ A2Z BUILDING SUPPLIES**

We are instructed by our client, Stonecrest Marble Ltd/ A2Z Building Supplies, to submit representations to Waltham Forest Council ('WFC') in regards to the Local Plan Part 1 (main modifications) consultation which is set to expire on 21 September 2023. As part of this representation, we seek to set out the background thus far on representations on behalf of our client.

### **Background**

We have previously submitted representations to Waltham Forest's Local Plan Part 1: Strategic Policies and Local Plan Part 2: Site Allocations Consultation seeking the allocation of land at Harbet Road, Chingford, E4 8QB which is in the ownership of our client for development and its removal from the Green Belt. We have also submitted representations to the Industrial Intensification SPD.

Whilst it is our intention to promote our client's site, Land at Harbert Road, for employment use in Local Plan 2, we note a number of modifications to the Local Plan Part 1 which is of interest to our client and set out each point in turn below.

#### **1) Introductory Paragraphs (reference MM1)**

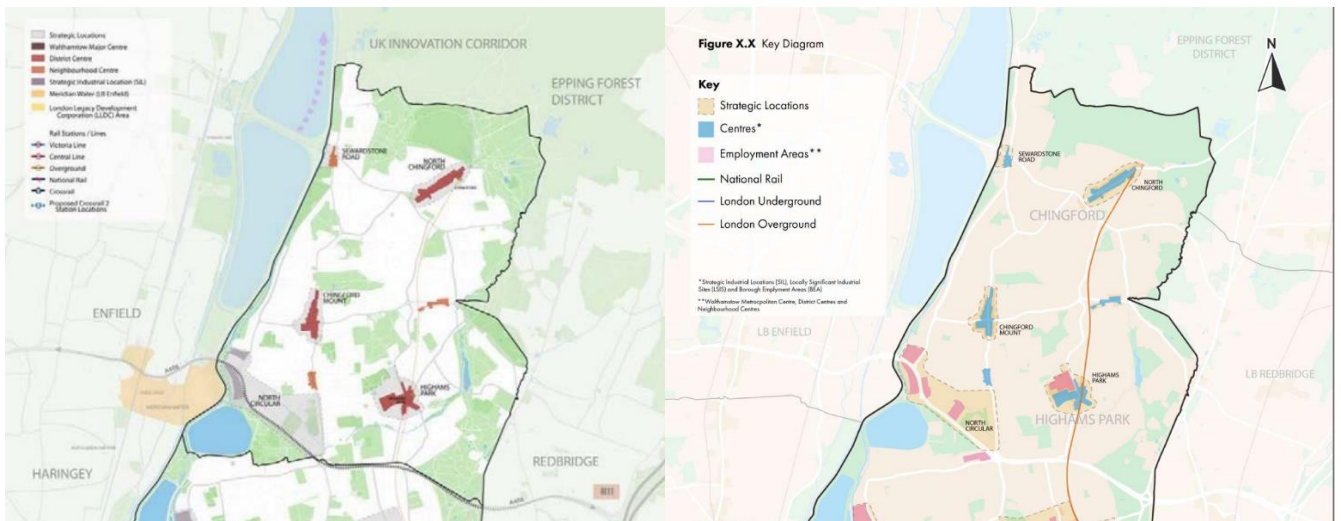
Amendment to the introductory paragraphs (reference MM1) commits the Council to creating spaces what are "safer, reducing fear of crime, maximising the number of local jobs and employment space" along with other delivery promises. As part of this promise, the Council should also commit to working with existing businesses which are under threat due to the increase demand for employment spaces as a result of the Meridian Water development, which is located within the neighbour borough of Enfield. This specific development has caused an acute demand for employment spaces of all size due to displacement and has created a scarcity in employment land for the local area. WFC should acknowledge the challenges which the borough is facing and commit to supporting existing businesses where development accords with the Local Plan. Therefore, it is requested that the passage is amended to the following (proposed new text in red):

...*"safer, reducing fear of crime, maximising the number of local jobs and employment space... , protecting existing businesses from being forced out, .... And delivering a whole range of community infrastructure"* etc.

*"Part 2 will establish key deliverables and expectations for these 'site allocations' to ensure that the right development, of the highest quality is delivered in the right places."*

#### **2) Strategic Locations Map (MM4)**

We SUPPORT the amendment to the Strategic Locations Map which is considered to improve legibility of site designations for Strategic Locations.



**Figure 1 & 2:** The submitted Strategic Industrial Locations map within Waltham Forest Local Plan (Part 1) and amended Map.

We note that the North Circular Corridor Strategic Location designation covers our client's site (please refer to figure 3 below for the site outline), which is situated below SIL3. In previous representations, we have drawn this fact to the attention of the Council and set out our case as to why this site should be specifically allocated as part of the Strategic Industrial Location. We will continue to seek the allocation of this site for development in Local Plan 2.



**Figure 3:** Outline of the Land off Harbert Road, Chingford (in yellow) (Google earth, 2023)

### 3) Policy 2 – Scale of Growth (modification reference MM7)

We SUPPORT the modifications to the policy which seeks to maximise opportunities for economic growth by promoting significant minimum levels of housing and employment development.

### 4) Policy 4 – Location of Growth (modification reference MM11)

We SUPPORT the policy and its modification to achieve a sustainable approach to accommodating planned, inclusive growth by focusing new development, regeneration and investment activities primarily in Strategic

Locations and other Site Opportunity Locations which will be the primary locations for growth involving minimum levels of new homes and jobs with supporting infrastructure.

**5) Policy 11 – North Waltham Forest (modification reference MM25)**

North Waltham Forest is recognised “as a distinctive area for targeted investment and growth in and around the designated centre and the North Circular Corridor” We SUPPORT the wording amendment that the Council are committed to working with existing businesses within the borough to help protect, maintain and grow industry in the borough.

Under paragraph C. of Policy 11, we OBJECT to the amendment:

- C. ~~Strengthens, supports and encourages existing and new employment opportunities in the North of the Borough, with the delivery of 1,950 new jobs~~ Promote and support the delivery of at least 1,950 new jobs in North Waltham Forest;

It is considered that the original wording, specifically the use of words “strengthens, supports and encourages existing and new employment opportunities in the North of the Borough” is preferred and more sufficiently demonstrates the Councils support for existing businesses as well as encourage new. The commitment to existing businesses allows for a reassurance in light of mass displacement of industries currently operating within the Borough.

We SUPPORT the wording amendments to paragraph K which encourage improved connectivity and new leisure opportunities in and around and in the vicinity of the Banbury Reservoir in the North Circular Corridor Strategic Location.

**6) Policy 25 – Supporting Economic Growth and Jobs (modification reference MM47)**

We SUPPORT the amendment to the introductory text to include “*protect the borough’s SIL capacity*” over the plan period which is a welcomed addition.

We SUPPORT the amendments to paragraph D and will continue to promote the allocation of our client’s site for development in Local Plan 2.

**7) New Paragraphs to follow Paragraph 9.9 (modification reference MM48)**

We SUPPORT the addition of text after paragraph 9.9 which recognises the particularly pressing need for B8 floorspace to support the logistics and distribution sectors and which seeks to guide development of industrial capacity to the most suitable locations which includes the North Circular Strategic Location.

We welcome the recognition given in the proposed text to the role of Local Plan 2 – Site Allocations which “will be to establish the capacity which is required to be provided on specific sites in order to meet the borough’s SIL-type/B8 industrial land needs” and to needs arising through re-provision for any loss. We also welcome the intent to increase the supply of SIL floorspace.

**8) Policy 26 – Safeguarding and Managing Change in Strategic Industrial Locations (SIL) (modification reference MM50)**

The specification of acceptable land uses within the SIL in accordance with the London Plan is welcomed.

**9) Policy 29 - Approach to Non-Designated Employment Land (modification reference MM54)**

We SUPPORT the addition of wording which supports development for industrial, business and related uses on non-designated employment areas where it provides fit for purpose and high-quality employment space



and upgrades existing poor or old stock. We will continue to promote the allocation of our client's site for development in Local Plan 2.

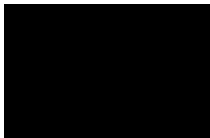
**10) Paragraphs 9.19 – 9.21, 9.23, 9.25 - 9.26, 9.28 – 9.29 (modification reference MM57, MM58 , MM59, MM60 and MM61)**

We SUPPORT the changes to the wording of supporting text relating to the intensification of existing industrial functions to provide additional industrial capacity.

**11) Addition of new paragraphs (modification reference MM122)**

We SUPPORT the addition of text relating to the approach to character-led intensification on sites identified in Local Plan 2 - Site Allocations.

Yours sincerely



John Bowles  
Director