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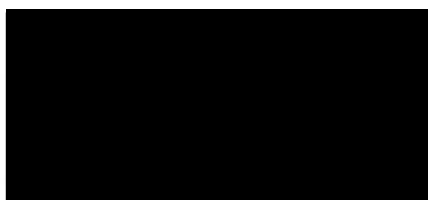
Dear Juliemma,

Re: London Borough of Waltham Forest - Draft New London Plan Response

Please find enclosed our response to the Draft New London Plan.

In summary, we welcome this opportunity to comment on the Draft London Plan. As set out in our response, much of it aligns with our own emerging planning policy and indeed we are already actively delivering many of the policies to ensure Good Growth across the borough for all our residents. However, we have also raised some issues for further consideration or clarification.

We would be happy to meet with your team to discuss our response but also to share our experiences of delivering many of the Draft Plan's policies. In addition, if you require any clarification on our comments please contact our head of planning policy Joe Addo-Yobo at planning.policy@walthamforest.gov.uk.



ClIr Simon Miller
Cabinet Member for Economic Growth and High Streets



London Borough of Waltham Forest
London Plan Response
February 2018

INTRODUCTION

1. We welcome the opportunity to respond to this consultation on the Draft London Plan (Draft Plan).

Update on Waltham Forest

2. In Waltham Forest, we are preparing to ensure we have the tools to deliver the Mayor's vision for Good Growth.
 - We have recently consulted on our Direction of Travel document (Regulation 18 Consultation), the first stage in our Local Plan Review. The policy directions set out in our Direction Travel align with many of the Draft Plan policies.
 - We have produced an Affordable Housing and Viability Supplementary Planning Document to assist in delivering more affordable homes
 - We have implemented Article 4 Directions to prevent the conversion of light industry, offices and retail into housing to ensure we support our thriving local economy
 - We are promoting the importance of good design through our Design Charters for Housing and our Design Review Panel. We are also consulting on a further Design Charter for Schools.
 - We are commissioning a Culture and Creative Enterprise Supplementary Planning Document funded by the Great Places scheme (HLF and Arts Council England)
 - We are investing in our cultural and heritage assets such as Walthamstow Wetlands, St James Street and William Morris Gallery.
3. We are also managing our Local Plan Review to tail the new London Plan, with the aim of ensuring we are in general conformity with the new policies once adopted. Therefore, we are aiming to adopt our new Local Plan in 2020.

COMMENTS

General comments

4. We welcome the Draft Plan, much of it aligns with our Local Plan Direction of Travel and as set out in our response we are already actively delivering many of the policies to ensure Good Growth across the borough for our residents.

Strategic

5. The role of the Mayor and the GLA is to provide strategic oversight of planning and development in London. We welcome the strong strategic policies on Good Growth and other policy areas in the Draft Plan.
6. However, many of these strategic policies are followed with more detailed policies within the Draft Plan. These more detailed policies restrict borough level Local Plans' abilities to set out locally distinctive policies in certain areas. We consider that the more detailed

policies in the Draft Plan need to be reframed within this context, remembering the strategic role of the Mayor and GLA. We think this reframing would also assist in making the document easier to use, reducing repetition within the Draft Plan and the overall length.

Resourcing

7. The Draft Plan is ambitious and we welcome this. We want to deliver Good Growth for all our residents. However this ambition will require resourcing. Our proposal is for a 'London Plan Delivery Fund'. Such a fund could be used to assist with the delivery of design codes, design analysis, master plans and monitoring. We would be pleased to work with the Mayor and GLA to work up a proposal and be a pilot borough if such an initiative were to be welcomed.

Infrastructure Delivery and Funding

8. We welcome the Draft Plan acknowledgement that social, physical and environmental infrastructure to meet London's diverse needs is essential to maintain and develop strong and inclusive communities and to deliver Good Growth. We also agree that investment in transport infrastructure and housing is critical, but consider that other types of social, physical and sustainable infrastructure that impact day to day quality of life for Londoners are just as vital. Investment in local infrastructure is fundamental to ensuring local communities' continued support for growth; that new opportunities for growth are embraced and that in the Boroughs, like ours, regeneration and growth momentum is maintained. Without such support and the necessary infrastructure it will be challenging to meet the level of growth outlined in the Draft Plan.
9. This is why we propose that Good Growth needs to be supported with an equally bold suite of funding opportunities to invest in infrastructure. The provision of essential local infrastructure required to deliver the ambitious intensification and housing targets will be challenging within the limitations of Section 106 and the Community Infrastructure Levy (CIL). We think that the Draft Plan and the Mayor should acknowledge this. We also believe that this is only made more challenging with the MCIL2. There needs to be a more equitable split between funding for local and strategic infrastructure needs.

Culture, heritage and the evening and night time economy

10. As winner of the London Borough of Culture 2019, we welcome the emphasis on culture, heritage, and the evening and night time economy. Culture is the golden-thread through our work across the borough.
11. The upgrading of Walthamstow's night time economy to regional importance is welcome recognition of how we are already implementing much of the policy in the Draft Plan. Examples of this include:
 - Bringing forward meanwhile uses in areas of regeneration including at St James Street with Big Local and Sideshow at Blackhorse Road with U+I.
 - Delivering a Creative Enterprise Zone in the Blackhorse Lane area.

- Growing and supporting our evening and night time economy across the Borough with the introduction of The Scene at Walthamstow which provides a cinema and restaurant uses. We are actively seeking to bring the EMD cinema back into use as a key performance venue for outer London and secure the Standard music venue at Blackhorse Lane.
- We adopted a Public Houses Supplementary Planning Document in March 2015 to assist with protecting pubs within the Borough. We have also been actively using our Assets of Community Value powers where appropriate, and have 20 public houses listed.
- We have refurbished the William Morris Gallery to ensure it is integrated into our cultural offer as a visitor attraction, which supports the local economy and provides opportunities for local businesses; it won Museum of the Year in 2013.
- We are delivering a programme called 'Creative Connections – Culture for All' as part of the Heritage Lottery Fund, Historic England and Arts Council Great Places Scheme. The Cultural Connections programme is focused on demonstrating how culture can improve our residents' quality of life by improving health and wellbeing, creating new employment and skills opportunities and improving economic prosperity.
- We would like to emphasise the need for the evening and night time economy to have more options that do not involve alcohol such as bowling, dancing, arts and culture.

Transport

12. We support the focus on a modal shift from car to walking, cycling, and public transport. As a borough:

- We are actively working to improve Waltham Forest's transport connectivity. We have re-opened Lea Bridge Station. We are also considering further opportunities for improvements and are looking into the feasibility of a new station at Ruckholt Road and re-introducing the Hall Farm Curve to allow direct travel from Chingford to Stratford. All of these improvements ensure that we have the infrastructure in place to support development sustainably.
- We are actively promoting the Healthy Streets Approach through initiatives such as Enjoy Waltham Forest, our £30m mini-Holland scheme, which has been hugely successful.

Health

13. We welcome the focus on health within the Draft Plan. Waltham Forest was the first Council to develop an SPD specifically to tackle the health impacts of hot food takeaways, by restricting their development around 'the school fringe', which we then carried over into our Development Management Policies DPD. We welcome the inclusion of our policy approach in the Draft Plan.

Comments on specific policies

Our comments on specific issues relating to individual policies are outlined below.

Chapter 1 Planning London's Future (Good Growth Policies)

Policy GG2 Making the best use of land

14. We agree in principle with making the best use of land. However, we have concerns over high-density development and how this fits within the character and context of Waltham Forest. Promoting overly dense development could lead to a loss of the Borough's distinctive and varied character. We are commissioning a Growth Capacity Study to understand how we can best accommodate growth.

Policy GG3 Creating a healthy city

15. We welcome the reference to Health Impact Assessments in GG3 D, but require this action to be reinforced to embrace a broader 'Integrated impact assessment' process that will ensure consideration of the wider determinants of health. An Integrated Impact Assessment includes: a Sustainability Assessment and Strategic Environmental Assessment; an Equalities Impact Assessment; and a Health Impact Assessment (HIA). The Health Impact Assessment is the only non-statutory assessment of the 3, and by including it in a broader process it is more likely that outputs will be actioned. There is also scope to include key elements of a HIA in a Sustainability Assessment and Strategic Environmental Assessment.

Chapter 2 Spatial Development Patterns

Policy SD2 Collaboration in the Wider South East and Policy SD3 Growth locations in the Wider South East and beyond

16. As an Outer London Borough we consider having a specific policy on how the Mayor will work with the wider South East is extremely important. We welcome its inclusion to assist us in working with our wider South East neighbour Epping Forest. However, we do not think it goes far enough. The policy does not mention how it will include Outer London Boroughs in this process. We think that there should be specific mention of these boroughs and how the Mayor will support them and work with them on wider South East regional issues.

Policy SD7 Town centre network

17. We agree with this policy. As a borough, we are focusing our main retail into our Major Town Centre, Walthamstow. We are considering how best to consolidate our other town centres and their functions. The borough is characterised by a dispersed pattern of commercial activities along arterial roads which make place shaping and place making more difficult.

Policy SD9 Town centres: Local partnerships and implementation

18. We agree with the policy that town centres should fulfil their full potential to accommodate growth. However, we do not consider that the above town centre policies

support this. In our borough, most of our town centres are district centres; these play a vital role for not only leisure and retail but also for office space. We do not consider that this has been fully realised or appreciated in the plan.

19. We have implemented an Article 4 Direction preventing retail to residential change of use in town centres.

Policy SD10 Strategic and local regeneration

20. We support the policy and emphasis on strategic and local regeneration. However, we consider there has been an omission: in Appendix 1 Table A 1.1. Row number 189. In this row Leyton is not considered an area for strategic regeneration. We propose Leyton should be included as a Strategic Regeneration area for the following reasons:

- Both our Economic Growth Strategy and adopted Core Strategy have identified Leyton, with Lea Bridge, as a key growth area. Core Strategy Policy CS1 states there is the ability to deliver around 2,500 new homes.
- Our regeneration vision for the area, Lea Valley Eastside, states that Leyton has potential to be an area of significant change, accommodating significant redevelopment. It states that there could be potential for 2,380 new homes.
- The area is designated as Housing Zone.
- Leyton has the possibility to extend the high street into Leyton Mills, improve connectivity to Queen Elizabeth Olympic Park, enhance the tube station and public realm, and provide a new neighbourhood at Coronation Square and an enriched food and business offer at New Spitalfields Market.
- There is also potential for a new station at Ruckholt Road unlocking opportunities for housing and employment.
- Improvements to Leyton Underground Station capacity and possible redevelopment opportunities would allow for further regeneration and growth within the area.

Chapter 3 Design

Policy D1 London's form and characteristics

21. The breadth and detail of the criteria set out in this key policy is supported, although further detail would be useful, particularly on how some of the criteria can be achieved. The detail could be provided via good and bad examples. For example:

- Part A (4) of the policy - further guidance should be provided on what is meant by “deliver appropriate outlook, privacy and amenity”
- Part A (6) - further guidance should be provided on what is meant by provide “positive reciprocal relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest”

22. Within the policies' supporting text, paragraphs 3.1.10 – 3.1.12 should be made clearer. It is currently confusing and needs further practical explanation on how it is expected to be delivered. It is also unclear how some of these matters can be negotiated and/or secured through planning legislation, or whether these are best placed under current Building Regulations.

Policy D2 Delivering good design

23. The criteria set out within this policy are supported, however, undertaking a full evaluation of the range of elements set out at part A (1) – (9) will require significant officer and other resources in relation to collection, analysis and on-going monitoring. Without access to this data, a full and proper assessment of schemes, particularly major development, is likely to prove challenging and potentially lead to unsatisfactory planning decisions. We would like to see funding made available to support the commission of borough-wide or strategic delivery plans to assist boroughs in ensuring the appropriate data can be collected and reviewed as required.
24. In part A (1) of the policy it is not entirely clear how some of the socio-economic data should be used in determining the capacity for growth in some areas. As an example, if population density is currently low in a specific area, does it follow that future schemes should seek to replicate a lower density (whilst seeking to optimise as appropriate) or alternatively promote much higher densities to maximise the potential for a significant increase in population?
25. This section should also underline the value of borough characterisation studies in providing a greater understanding of an area's historical development, key building typologies and environmental features, and how growth can be delivered in a way which respects character wherever appropriate. This is particularly challenging given the likely quantum of development coming forward.
26. We strongly support the use of design reviews as set out in part F of the policy. We have our own successful Design Review Panel set up and run by the Design Council CABE. As set out in part G of the policy, we agree that it is particularly important that schemes show how they have considered and addressed the review recommendations. We also consider that the recommendations should be addressed in any planning decisions relevant to the particular proposal.
27. We also strongly support the concept of architect retention set out in part H of the policy. We agree that this should be included within legal agreements where applicable. However, further clarification is sought on how these clauses can be properly enforced.

Policy D4 Housing quality and standards

28. The criteria set out within this policy are supported. However, clarification is sought on what is meant by "innovative housing designs" on constrained sites (as set out in Part A), in view of their potential cumulative impact on local character, distinctiveness and any heritage characteristics that may apply.
29. In the supporting paragraph 3.4.11, we would suggest that an additional bullet point should be inserted to say that ground-floor bedrooms directly facing the public street or

highway should be avoided where possible in the interests of both protecting privacy for residents and the potentially negative impact in relation to the provision of active frontages.

30. We would like to see the precise term 'Minimum space standards for new dwellings', being referenced as stated in Policy 3.5 Quality and Design of Housing Developments in the current London Plan.

Policy D6 Optimising housing density

31. We support the principle of taking a design-led approach to development and the need to make the most efficient use of land. However, the assessment of schemes will require a clear and systematic assessment based on the elements set out at Policy D2 (A) which will in turn require significant officer and other resources to collect, analyse and evaluate (as previously mentioned above).
32. We agree that the higher the density of development, the greater the level of scrutiny that is required. There is a concern however, that even with access to this data, using a more flexible approach to density may mean some developers taking the opportunity to maximise, rather than optimise density and quantum to the detriment of local character, good design and place-making. This is a particular issue in a borough like Waltham Forest with an often more suburban character, particularly in the north of the borough.
33. We note the guidance at part B (3) where it is stated that "Where there is currently insufficient capacity of existing infrastructure to support proposed densities, boroughs should work with applicants and infrastructure providers to ensure that sufficient capacity will exist at the appropriate time". We would question how realistic an aim this can be given normal development (and developer) pressures and the often longer timescales involved in securing appropriate infrastructure, particularly for major schemes.
34. The broad density guidelines set out at Part C are helpful to an extent but again may be likely to lead to developers using these figures as a benchmark to maximise, rather than optimise, residential densities.

Policy D7 Public realm

35. We support this policy. Reference should also be made to the value of providing high quality, usable public space in major developments.

Policy D8 Tall buildings

36. We support the approach taken in this policy, particularly the need to take a plan-led approach to tall buildings. We suggest that the policy should state that proposals for tall buildings which do not comply with the borough's locational strategy in the development plan should not normally be granted permission; unless robust justification and a clear planning and design case can be demonstrated.

Policy D9 Basement development

37. We have no objection in principle to this policy, noting that this type of development is not typical in Waltham Forest. As such, for reasons relating to local context, it is unlikely that planning permission would be granted for this type of development, other than in very exceptional circumstances.

Policy D10 Safety, security and resilience to emergency and Policy D11 Fire safety

38. We agree that all buildings should achieve the highest standard of fire safety. However, we do not consider that this lies within planning. Such issues should be dealt with via architectural process and Building Regulation under Fire Safety Approved Document Part B. Planners do not have training in fire safety and would not be able to properly assess any Fire Statement submitted. There are also resource implications for the London Fire Brigade and planning departments if such a responsibility were to lie within planning departments at borough level.

Policy D12 Agent of Change

39. We welcome this policy and support the Agent of Change principle to support the evening and night time economy. However, we note that:

- there is potential conflict between this and policy DM13 Noise,
- Licencing requirement issues, and
- The Agent of Change principle could be undermined by noise outside of venues once people leave for existing residents. Consideration should be given to how this could be mitigated.

40. The potential issues need to be resolved so this policy can be fully implemented and support the evening and night time economy.

Chapter 4 Housing

Policy H1 Increasing housing supply

41. We have concerns over the deliverability of the target, not the ambition. As a borough, we set ourselves the ambitious target of building 12,000 homes by 2020. We support growth where it is achievable, deliverable and supported by appropriate infrastructure.

42. As the GLA are aware, the Housing White Paper set out a new Housing Delivery Test (HDT). The HDT is expected in the updated NPPF. Such a high housing target could set us up for failure with the HDT. From discussions with the Planning Advisory Service, the repercussion of this will be an ever increasing housing target for boroughs and the requirement to produce a Housing Delivery Plan. Both of these will require additional resources to deliver.

43. The housing target set out in the Draft Plan for our borough is 1,794 per annum over a ten year period. The target is a 108% increase on our existing housing target. We think this will be challenging to deliver. We are concerned that delivering the quantum of housing outlined in the Draft Plan will have a detrimental effect on the character of the borough and lead to unsustainable growth unless carefully planned for.

44. We acknowledge that the need for housing in our borough is high. Our Strategic Housing Market Assessment (SHMA) undertaken by Cobweb, concludes we have an objectively assessed need of 1,810 per annum over the period 2014-2039¹.

45. We agree with preparing delivery focused development plans and are developing this approach:

- As part of our Regulation 18 consultation, we also held a 'Call for Sites' to start the process of allocating an appropriate range and number of sites to support a range of land uses.
- We are also commissioning a Growth Capacity Study to look at how best as a Borough we can optimise housing delivery.
- Through One Public Estate we are redeveloping surplus public sector owned sites working with other public sector partners within the Borough.
- We have completed our Brownfield Land Register and are looking at how we can improve and use this actively as a tool to support our New Local Plan² and agree with H1 part C.
- In line with part E, we are seeking to improve infrastructure provision within the borough to support housing delivery, for example, we are currently reviewing the prospect of a new station within the Lea Valley Opportunity Area called Ruckholt Road Station. We have already delivered a new station in that same OA, Lea Bridge Road. These stations are in addition to significant investment in our cycling infrastructure as part of our Enjoy Waltham Forest project, funded via the TfL Mini Holland scheme.

Policy H2 Small sites

46. We agree that there is an opportunity across London and our Borough for small sites to play a greater role in housing delivery. A presumption in favour of small sites is a welcomed policy, as long as it leads to well-designed new homes that respect the character, context and local distinctiveness of the area, do not lead to substandard living conditions, and are supported by appropriate infrastructure.

47. We are concerned that our housing target in the Draft Plan is reliant on a large proportion being delivered on small sites. The small sites target set out in Table 4.2, 889 units per annum on sites of 25 units and less, is a challenging and high target. It is also not based on evidence i.e. historic delivery rates of small sites. We understand the role small sites play in housing delivery, however, over the last 5 years, on sites of 25 units and below, we have only delivered 1,998 units. Stepping up this delivery to 4445 over a 5 year period will be challenging and require funding for adequate supporting infrastructure.

¹ London Borough of Waltham Forest, (2017), [Strategic Housing Market Assessment](#)

² London Borough of Waltham Forest (2017), [Brownfield Land Register](#)

48. We recognise that local character evolves over time but consider that this policy should have a stronger understanding of character and context, particularly in relation to heritage assets. We do not consider that this policy has given much consideration to heritage assets, particularly conservation areas. The Small Sites presumption is proposed to be within 800m of our town centres and public transport. Many of our conservation areas are located within 800m of our town centres or public transport, for example - Bakers Arms and Leyton.
49. Design Codes are a welcome idea to support small sites and ensure that areas have consistent character; however securing and resourcing professional staff to produce design codes will be challenging. The Design Codes will also take some time to draft and consult on. Therefore a phasing of the implementation of Policy H2 should be set out to allow reasonable time for Boroughs to prepare and adopt areas design codes in advance of development and the application of the presumption in favour. We also believe that the Mayor should proceed with some caution with regard to this Policy as design codes are not going to provide a one-size fits all solution for small sites which are often widely distributed and with unique, site specific parameters to consider.
50. We note in the past that the Mayor has provided funding for unlocking small sites, e.g. Homes Behind the High Street and has now launched the Small Sites Program. We consider funding pots such as this should be provided to support the feasibility of unlocking small sites.
51. The small sites policy may have significant impacts on our ability to plan effectively for infrastructure delivery. The incremental increase in residential population will impact pressure on existing infrastructure facilities. If infrastructure and services are funded via planning obligations, the infrastructure will lag. We do not consider that this will lead to Good Growth. There are also issues over our ability to seek Section 106 contributions of sites of 10 units or fewer due to Government policy.
52. Finally we also welcome the reference of community led housing in Part A (4) of the policy. However, we consider that a separate policy for community led housing should be included to provide clearer guidance for how Borough's can plan for this type of housing.

Policy H5 Delivering affordable housing

53. We welcome the strategic target for 50% of all new homes to be affordable and are proactively supporting the Mayor in this. However, we consider that the Mayor and the GLA needs to recognise that this target is challenging. We want to meet this challenge but will need support from Mayor, GLA and the Government in terms of resource and funding. The policy should clarify what support, resource and funding will be available to boroughs.
54. We are about to adopt our Affordable Housing and Viability Supplementary Planning Document to ensure we set out clearly what is expected for affordable housing delivery within our borough to all stakeholders. We have also highlighted the need to deliver more affordable homes in the borough in our Local Plan Direction of Travel.

55. A key issue for Waltham Forest will be the impact of the proposed MCIL2 tariff which has been increased. We consider that this will severely impact on our ability to increase affordable housing contributions, as CIL is a non-negotiable charge.

56. Part B of the policy is in line with our existing Local Plan. We agree that affordable housing, where possible, should be delivered on site to ensure inclusive communities and consider this a key component of Good Growth.

Policy H6 Threshold approach to applications

57. In Part I of Policy H6, where it states that “any proposed amendments that result in a reduction in affordable housing...rigorously assessed” we suggest a rewording. Its rewording should be clear and stronger in stating that renegotiating existing affordable housing contributions downwards will not be allowed.

Policy H7 Affordable housing tenure

58. We agree in principle with Policy H7 but consider that it will be challenging to deliver these target tenures, in addition to those set out in Policy H1 and H2. The Mayor and GLA need to recognise this.

59. Our Strategic Housing Market Assessment has shown 69% of our housing need is for affordable homes. We understand and recognise the need for delivering more across all affordable housing tenures. We want to meet this challenge, however, we will need support from the Mayor, GLA and Government in terms of funding and resourcing, particularly to meet the required 30% low cost and social rent set out in this policy.

60. We consider that this policy is very prescriptive. It requires on all sites a minimum of 30% low cost rent and 30% intermediate housing with the remaining 40% to be determined by the borough. We consider that the policy should be reworded to include some flexibility. The flexibility in the policy should recognise the challenges of delivering the proposed tenure mix in certain cases, for instance where significant infrastructure investment is required. There needs to be an understanding that delivering this mix will not be possible in all cases.

Policy H3 Monitoring housing targets and Policy H8 Monitoring of affordable housing

61. We consider that these two policies could be merged. We also agree with the principle of Policy H8 part D; but consider that this will take significant additional resource and funding by individual boroughs. Our proposal to help alleviate the resourcing pressure for boroughs is a pan London resource that could be provided to Boroughs with limited resources.

Policy H11 Ensuring the best use of stock

62. We agree that existing housing stock should be used efficiently, including reducing the number of empty dwellings. However, the policy does not set out the tools which boroughs should be using to assist in this endeavour. We would welcome further guidance from the Mayor and GLA on the delivery of this policy. *Policy H12 Housing size mix.*

63. The proposal set out in Policy H12 represents a step change in policy and approach at borough and GLA level. We agree with the principle of the policy, that the appropriate mix of unit size would be best decided on a site by site basis with consideration of context, tenures and SHMA. However, we consider that this approach is much more resource intensive for planning departments.

Policy H15 Specialist older persons housing

64. We support this policy but seek clarification on whether the figure in Table 4.4 forms part of our housing target or is an additional target.

Policy H17 Purpose-built student accommodation

65. We welcome this policy. We agree with purpose-built student accommodation having to provide 35% affordable student housing. We consider that there may be some practical issues with the university nomination rights and would seek further guidance from the GLA and Universities on how this will work in practice at a Borough level.

Policy H18 Large-scale purpose-built shared living

66. We welcome the introduction of such development providing affordable housing. However, we do not consider that the policy goes far enough and think such developments should be subject to minimum space standards as with other housing to avoid substandard living conditions.

Chapter 5 Social Infrastructure

Policy S6 Public toilets

67. We do not agree with this policy. As a borough we have been successfully operating a Community Toilet scheme and consider that this is sufficient. The resource implication of monitoring and managing this policy could be significant.

Policy S7 Burial space

68. We agree with the protection of, and support for new cemeteries. However, as a borough we have limited burial capacity remaining. The Mayor should be taking a more prominent role, working with boroughs to identify capacity across London for all faith groups.

Chapter 6 Economy

Policy E1 Offices

69. We have commissioned GVA to produce an Employment Land Study. Our Employment Land Study states that most of our future employment, 70%, will be office-based. Office activity is an important part of our economy and Walthamstow is expected to become increasingly attractive for office space.

70. We support Policy E1 Part A, which seeks improvements to the competitiveness and quality of office space across a range of sizes through refurbishment and mixed use development.

71. We support Policy E 1 Part B which seeks to increase current stock of offices in London. We propose this part of the policy should be linked to Policy SD7. These policies will be used together and therefore both should better reflect each other. There may be confusion over viability and sustained demand. We welcome advice on which policy takes priority.
72. We support part E and part F of the policy which encourages boroughs to use Article 4 Directions. We are in the process of using Article 4 Direction powers to remove permitted development rights for the change of use from office to residential.

Policy E3 Affordable workspace

73. We welcome this policy. Affordable workspace is important and as a borough we are leading in its delivery with the award winning Central Parade.
74. We do not consider that Part E should be included. Part E relates to leases which fall under property law and not planning.
75. In principle we agree with Part F that affordable workspace elements of a mixed use scheme should be in operation prior to residential elements being occupied but consider this will be hard to secure via planning. We would welcome further guidance from the Mayor and the GLA on how we can deliver Part F of the Policy.

Policy E4 Land for industry, logistics and services to support London's economic function; Policy E5 Strategic Industrial Locations (SIL); Policy E6 Locally Significant Industrial Sites and Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function

76. Our response to these policies is as follows:

- We welcome the recognition of the important role industrial land plays in London's economy; particularly in East London and Outer London.
- We support the Mayor's position that there should be no net loss of industrial floorspace capacity in the borough, set out in policy E4 Part C, Figure 6.1 and Table 6.2.
- We agree with Policy E4 Part G and have already introduced Article 4 Directions preventing permitted development rights for the change of use from light industrial B1 (C) to residential C3.
- We agree with policy E5 part A. We recently commissioned Regeneris Consulting to undertake a Business Audit of our Strategic Industrial Locations and our Borough Employment Areas to see how these could best be proactively managed to sustain them; including what could be achieved through the plan-led process but also through business and regeneration support.
- We agree with Policy E5 part D. We are producing an Employment Strategy to underpin our Local Plan and part of this process will be considering if we need to consolidate any of our SIL; particularly in the context of Part E of the same policy.

- We support limited release of industrial land as long as there is no net loss of industrial floorspace and are considering options to deliver this within Lea Bridge and Leyton, our key growth area. We are aligned with Policy E7 part A. As a borough with limited land resource and a high housing target and need, we are exploring how and where we can deliver intensification. At present, we are working on two sites to see if this could work. The first site is Low Hall Depot, where we have commissioned work on the feasibility of stacking different uses with industrial. The second site is Rigg Approach, where we are working with the GLA Regeneration Team to see if intensification could work whilst retaining the existing employment floor space. If feasible these will be included as policies within our new Local Plan.
- The resource implications of delivering this work across planning, regeneration and business teams need to be recognised, and where possible the Mayor should provide funding and resource to assist in the delivery of proposals for intensification and retention of employment land.

Policy E8 Sector growth opportunities and clusters

77. We welcome this policy and the focus on considering sectors and how planning can support them. However, we consider the policy could be improved. The sectoral focus is too narrow. Many of the sectors primarily focused on are related to the Central Activity Zone. There should be a better understanding of what sectors are important to outer London Boroughs.

- All Urban Services should be included, beyond those mentioned in the Draft Plan. These are the services which are essential to London– cleaners, dry cleaners and so forth; and are therefore of strategic and pan London importance. These are an important part of the outer London economy too, particularly on industrial land. The construction industry should be included as an important sector to promote in London. Construction is one of the largest sectors in our borough.

Social Care and Health Sector should be included within the Draft Plan. It is a growing sector for example Care City and the dementia hub in East London.

Policy E9 Retail, markets and hot food takeaways

78. We agree with this policy but consider that it is repeating the same policies at SD6, SD7, SD8 and SD9.

79. We welcome part C of the policy as the first borough to identify the problem and create a solution through the 400m walking distance policy. However, we do not consider that planning can ensure operator compliance with the Healthier Catering Commitment standard and think that this is best pursued through Environmental Health via food hygiene or via licencing. We consider this should be removed from the policy.

Chapter 8 Green Infrastructure and Natural Environment

Policy G2 London's Green Belt

80. The policy is not in line with the NPPF and the Housing White Paper. Local Planning Authorities can de-designate Green Belt as part of a plan-led process. There is a prospect that we may need to look to de-designate a limited amount Green Belt as part of the Local Plan process in order to meet our housing target of 1,794 homes. This policy should be re-worded to comply with national planning policy.

Policy G3 Metropolitan Open Land

81. We welcome the understanding that release of MOL may be appropriate but only as part of a plan led process. MOL is supposed to be treated the same as Green Belt. We therefore consider that policy G2 should be brought into line with policy G3.

Policy G4 Local green and open space

82. We consider there should be an understanding not only of the amount of green space but also the quality of that green space when considering whether or not it should be protected.

83. A needs assessment of green space is a good idea but again will require additional resource.

Policy G5 Urban greening

84. We agree with this policy and the principle behind using a metric such as the Urban Greening Factor. However, its implementation will be competing against other planning obligations such as affordable housing delivery and infrastructure delivering including contribution to Mayoral CIL. We consider there may be some difficulties, financially, in delivering this policy.

Policy G7 Trees and woodlands

85. We support this policy and as a borough have been actively planting trees. By end of 2017 we planted over 1,200 trees across the borough, taking us to over 50,000 trees.

Policy G8 Food growing

86. We do not consider that allotments need to be included in this plan because they have sufficient protection.

87. We agree with identifying sites for commercial food production but consider strategically the GLA and Mayor should lead on this due to the resource implication at Borough level.

Chapter 9 Sustainable Infrastructure

88. We welcome the policies within this Chapter. However, we have noticed an omission within it and its policies. The Draft Plan does not include any reference or requirement for higher standards of sustainability in residential schemes (e.g. Home Quality Mark or Passivhaus). We would encourage the Mayor and the GLA to include policies on this to allow boroughs to ensure that new homes delivered are as sustainable as possible. We understand this may include the undertaking further work on looking at the viability and need for requiring higher standards of sustainability.

Policy SI 1 Improving air quality

89. We welcome the policy on air quality. We are working on updating our Air Quality Action Plan and much of the policy aligns with this.
90. We welcome the proposals set out in Part A 3) of the policy which introduce requirements for some developments to be 'air quality positive'. In terms of offsetting, we would suggest that offsetting guidance is produced and takes into consideration proximity of offsetting measures to areas of air pollution. There is a risk that areas already affected by poor air quality will get worse if measures are not implemented on site and are instead offset elsewhere. There should be controls in place to ensure that any off-setting happens within a defined radius of the site and within areas affected by air pollution, so as not to intensify air pollution in hot spots.
91. We would welcome clarity and guidance on whether the Policy SI 1 Air Quality applies to buildings being refurbished or planning applications for change of uses.

Policy SI2: Minimising Greenhouse Gas Emissions

92. We welcome Part C of the policy, particularly new 'Be Lean' targets and emphasis on secondary heat in the 'Be Clean' stage of the energy hierarchy. However, it is not clear from the Draft Plan how far these targets apply to refurbishments and change of use. Retrofitting existing buildings is essential if we want to meet the Mayor's ambition for a zero carbon London by 2050. It should be made more explicit in the London Plan the targets that existing buildings are expected to meet, and further guidance on this and what is a reasonable reduction in different types and scales of refurbishment would be welcomed.

Policy SI5: Water infrastructure

93. We welcome the policy and support the minimising of water use across London. However, we do not consider that Part C (3) of the policy is strong enough. Our proposal is that there should be specific reference to greywater harvesting to ensure it is included within developments. The inclusion of greywater harvesting, matched with stronger targets, could also be incentivised by an offsetting requirement.
94. We would also welcome guidance, either within the Draft Plan or a SPG, on how to assess the viability of greywater harvesting as part of schemes.

Policy SI7 Reducing waste and supporting the circular economy

95. We are a member of the London Waste Planning Forum and are one of the member authorities of the North London Waste Plan. It is understood that the LWPF will be making its own response to the waste policies in the Draft Plan which will include our further comments.
96. The principle of waste reduction is supported as is the target for zero biodegradable/recyclable waste at SI17 A3). However we are concerned that the definition of municipal waste at SI17 A4 a) (footnote 127) does not match the

Environment Agency's definition of municipal waste as the latter includes industrial waste. This could pose a problem for local authorities in monitoring against the target.

97. In addition we have concerns regarding the target for CD&E waste at SI17 A4 b). Given the difficulty of recycling excavation waste and the planned major infrastructure projects (e.g. Crossrail 2), this may be an issue for the wider South East.

Policy SI8 Waste capacity and net waste self-sufficiency

98. With particular reference to SI18 B1-3, We consider that the Mayor should be going further than this policy and taking a more active strategic role in supporting local authorities to meet their apportionment noting that call for sites exercises such as that recently carried out by this authority do not tend to elicit sites put forward for waste management purposes. Accordingly rather than requiring local authorities to allocate sites, a more effective and perhaps co-coordinated solution would be for the Mayor to support local authorities in identifying areas of search. This may have the beneficial effect of increasing capacity and go some way to alleviating potential problems and capacity issues that may arise from the co-location of waste and residential uses.

Policy SI9 Safeguarded waste sites

99. We do not consider that part C of this policy will be deliverable. Notably it appears to conflict with para 9.8.7 of SI18 which promotes a flexible approach to safeguarding waste sites. In addition it does not give clear recognition to the waste apportionment system across London in which a capacity surplus in one borough might net out a deficit in another. This is another area which would benefit from higher level strategic coordination.

Chapter 10 Transport

Policy T5 Cycling

100. We welcome the proactive policy on cycling. However, we think there has been an omission in Table 10.2. As a Mini-Holland borough, we have been requiring higher cycle parking standards from developers, and TfL have been expecting this of us. We would like this expectation of higher standards in Mini-Holland boroughs to continue, however the draft new London Plan shows the vast majority of Waltham Forest as not being covered by higher cycle parking standards. We propose that this is changed in Table 10.2.

Chapter 11 Funding the London Plan

Policy DF1 Delivery of the Plan and Planning Obligations

101. We welcome parts A, B and C of the policy which are firm on viability and how it should be taken into account in the plan making and planning process.
102. We agree with the priorities set out in part D of the policy which prioritise the delivery of affordable housing, public transport and then social infrastructure.

103. However, we consider that this policy does not take into account the Mayor's CIL Draft Charging Schedule for Crossrail 2. Our own analysis, as set out in our response to Mayoral CIL2, shows that under the current regime, approximately 23.5% of all developer contributions secured through CIL is passed to the Mayor as MCIL. Under the proposed MCIL2, circa 48% of all developer contributions secured through CIL would be passed to the Mayor. The Borough's primary concern is that the remaining 52% is expected to fund all other forms of social, sustainable and green infrastructure, as well as local transport improvements. We do not consider this to be an equitable split and it would seriously compromise the Borough's ability to deliver 'Good Growth' as well as the many other policy commitments as prescribed in the Draft Plan.

104. We have also recently reviewed our CIL Viability analysis, incorporating the draft MCIL2 rates from the Preliminary Draft Charging Schedule. Despite having some of the lowest comparative charges in London, the conclusion of this work is that the Borough is now heavily constrained in its ability to increase local CIL charges both geographically and within particular use classes as MCIL2 has the effect of 'scooping up' any increases in value that could have justifiably been captured via local CIL. We consider that this will make delivering this policy difficult. We would welcome a conversation on this with the Mayor, GLA and TfL.

Chapter 12 Monitoring

Policy M1 Monitoring

105. We understand the importance of monitoring as part of the planning process to ensure policies are being adhered to, and to understand if policies are effective. However, we consider that the London Plan has not fully understood the lack of resources at a Borough level. We consider that the Mayor should either provide the resources available at the GLA to Boroughs or should provide funding.

106. The lack of monitoring indicators for waste is noted and should be addressed in this section.

107. We consider that all other monitoring policies, such as those on Housing, should be put into this section.

CONCLUSION

108. We welcome the Draft Plan. We support the Good Growth principles on which it is based. We included these principles within our Local Plan Direction of Travel and many of the policies and issues set out in the Draft Plan.

109. As we have said, as a borough, we are already delivering many of the policies set out in the Draft Plan and are happy to meet with your team to share our experiences with you.

110. If you require any clarification on our comments please let us know.