

## London Borough of Waltham Forest

---

Report Title Local Plan Part 2 (Site Allocations) and redesignation of the Highams Park Neighbourhood Forum

---

Meeting / Date Cabinet, 9<sup>th</sup> July 2024

Cabinet portfolio Councillor Ahsan Khan,  
Deputy Leader (Housing  
and Regeneration)



Report author/  
Contact details Sarah Parsons, Assistant Director Place and Design  
Place Directorate  
Sarah.parsons@walthamforest.gov.uk

Wards affected All

Public access Open

Appendices Appendix 1: List of Proposed Site Allocations  
Appendix 2: Map of Proposed Site Allocations  
Appendix 3: Equalities Impact Assessment of the submission version of the Local Plan Part 1 (November 2020)  
Appendix 4: Equalities Impact Assessment of the submission version of the Local Plan Part 2 (June 2024)

### Summary

- 1.1 The new Waltham Forest Local Plan provides an Inclusive Growth framework that will reduce inequalities and deliver benefits for all communities across the borough, in line with all six Mission Waltham Forest Borough Missions.
- 1.2 The new Waltham Forest Local Plan is in two parts. Part 1, adopted on 29 February 2024, establishes the borough-wide spatial strategy, based around 16 Strategic Locations. These have been identified as the most sustainable locations for future inclusive growth – each with its own supporting masterplans and assessment of existing and planned infrastructure. Part 2 will complement Part 1 by allocating specific sites for inclusive growth and setting clear expectations for the type of development (including any site-specific infrastructure requirements) that Council would support and the quality of design and place-making that the Council would expect.
- 1.3 Local Plan Part 2 is at an advance stage of preparation. Extensive consultation was undertaken between 2019 and early 2022, including a “Proposed Submission Version” (Regulation 19) consultation between November 2021 and January 2022, with Cabinet approval given in July

2021. Following the adoption of Local Plan Part 1, Part 2 has been reviewed to ensure full alignment. This report seeks Cabinet approval of the revised list of Proposed Site Allocations set out in Appendix 1 which will then be included in Local Plan Part 2. Delegated authority is also sought for the Corporate Director of Regeneration, Planning and Delivery in consultation with the Portfolio Lead for Housing and Regeneration to finalise and then consult on Local Plan 2 'Proposed Submission Document' before submitting it to the Secretary of State for independent examination.

- 1.4 In addition, Cabinet is asked to approve the redesignation of the Highams Park Planning Group as a Neighbourhood Forum following consultation that ran from 6<sup>th</sup> May to 14<sup>th</sup> June 2024. Both the group and their Neighbourhood Planning area were originally designated on 15 July 2014. Neighbourhood forums must be officially redesignated every five years or their forum designation will expire (area designations do not expire). The Highams Park Neighbourhood Planning Group were redesignated on 8 July 2019, and the Highams Park Neighbourhood Plan they prepared was approved through a local referendum on 5 March 2020, and adopted by the Council on 21 May 2020.

## 2. Recommendations

### 2.1 Cabinet is recommended to:

- 2.1.1 Approve for inclusion in Local Plan Part 2 (Proposed Submission Document) the sites identified in Appendix 1.
- 2.1.2 Delegate authority to finalise Local Plan Part 2 (Proposed Submission Document) ahead of consultation, to the Corporate Director – Regeneration, Planning & Delivery in consultation with the Portfolio Lead Member for Housing and Regeneration.
- 2.1.3 Delegate authority to publish Local Plan Part 2 (Proposed Submission Document) for statutory consultation to the Corporate Director – Regeneration, Planning & Delivery in consultation with the Portfolio Lead Member for Housing and Regeneration
- 2.1.4 Delegate authority to the Corporate Director – Regeneration, Planning & Delivery in consultation with the Portfolio Lead Member for Housing and Regeneration to submit Local Plan Part 2 to the Secretary of State for independent Examination in Public.
- 2.1.5 Redesignate the Highams Park Planning Group as a Neighbourhood Forum in accordance with the Neighbourhood Planning (General) Regulations 2012 (as amended).

## 3. Proposals

- 3.1 The Local Plan is a long term, inclusive growth strategy for Waltham Forest for 2020-2035. It establishes how the Council can go as far as possible to meet the need for new affordable homes, maximise local jobs and employment space and deliver a whole range of community

infrastructure (including health and education facilities, early years provision, public transport/station improvements, facilities for young people and new cultural amenities) whilst also:

- securing Exemplar Design;
- protecting and enhancing the character of local areas;
- providing new and improved green spaces and public realm;
- responding to the climate emergency;
- improving air quality;
- reducing flood risk; and
- creating safer spaces and reducing fear of crime.

- 3.2 In accordance with the Council's Local Development Scheme, (last approved by Full Council in February 2024), the new Local Plan for the Borough is being prepared in two parts.
- 3.3 Part 1 establishes the borough-wide spatial strategy and planning policies against which planning applications will be assessed. It has been rigorously examined by independent Planning Inspectors and found to be sound, legally compliant and capable of adoption. Accordingly, it was adopted by Full Council on 29 February 2024.
- 3.4 Part 2 develops further the spatial vision and targets for planned growth to meet the borough's needs as set out in Local Plan Part 1 by allocating sites and setting clear expectations for the placemaking value and Exemplar Design quality expected on each.
- 3.5 The evidence behind Local Plan Part 1, examined by the independent Planning Inspectors, shows that 1,810 new homes need to be delivered in the Borough every year<sup>1</sup> to address housing need, and that the Borough has the capacity to go as far as possible to meeting this need by building an average of 1,800 homes per year, or 27,000 new homes over the fifteen year 'Plan Period' (2020-2035).
- 3.6 Local Plan Part 1 evidence also shows that the Borough needs to deliver 52,000sqm of new employment floor space by 2035.
- 3.7 The supporting Infrastructure Delivery Plan (IDP) sets out the new infrastructure that will be required to support planned inclusive growth to meet these needs. The IDP is a 'live' document that is currently under review.
- 3.8 Through the allocation of sites for a range of uses (including the provision of infrastructure and open space), subject to carefully drafted site requirements and placemaking principles that respond to the specific conditions and context of each site, the Council can direct the right type of planned, inclusive growth to the right sites.

---

<sup>1</sup> For the reporting period 2014-2039

- 3.9 Local Plan Part 2 is at an advanced stage of production, with much of the work to identify sites and what should be delivered on them carried out concurrently with preparation of Local Plan Part 1. Extensive consultation was undertaken on Local Plan Part 2 between 2019 and early 2022, including a “Proposed Submission Version” (Regulation 19) consultation between November 2021 and January 2022. This was approved by Cabinet on 8<sup>th</sup> July 2021. The focus then shifted to steering Part 1 through the statutory Examination process. With Part 1 now adopted, it is important to ensure Part 2 is in full alignment, and to progress it to adoption.
- 3.10 A further round of “Proposed Submission Version” (Regulation 19) consultation on an updated version of Local Plan Part 2 is planned for summer 2024, subject to Cabinet approval. This will be treated as a continuation of the previous consultation and representations made as part of both consultations will be submitted to the Secretary of State to be considered as part of the Examination in Public.
- 3.11 If Cabinet support the recommendation, consultation will begin as soon as possible, and will run for nine weeks. This exceeds the six weeks required in order to ensure everyone who wishes to, has the opportunity to engage with the consultation whether during term time or school holidays.
- 3.12 The additional Regulation 19 consultation ensure that local people and statutory consultees have the opportunity to comment on the updated version of Local Plan Part 2.
- 3.13 Officers will ensure the consultation is open and accessible to all, and that there is a dedicated approach to engaging young people and groups who have previously been less engaged, such as those with disabilities and private renters. Officers will also work with the Communities and Participation team to identify community organisation(s) that could help us engage with groups that are often less heard from during planning consultations.
- 3.14 It is recognised that the prescribed and technical language required under the regulations could potentially limit participation in the consultation process. Officers will therefore publish clear, plain-English guidance alongside the consultation to assist respondents and hold workshops to provide focused assistance. The consultation will also be informed by the Community Engagement Toolkit, which is a ‘live’ document that was produced in response to recommendations from Growth Scrutiny Committee following their 2019/20 themed review – “Engaging businesses and residents in shaping our approach to growth and regeneration”. The toolkit is intended to ensure that Officers take a consistent approach to engagement and continue to put into place the recommendations made. It has recently been updated in response to lessons learnt during engagement programmes undertaken since it was first produced, including the addition of further guidance on how to engage with groups that are often less heard from during the planning process, including young people, private rented sector housing tenants and those with learning disabilities.

- 3.15 103 sites are proposed for allocation in Local Plan Part 2, consisting of 72 sites from the previous version of the document (November 2021 to January 2022) and 30 potential additional allocations. The proposed sites are set out in Appendix 1.
- 3.16 Most site allocations will be required to deliver a mix of complementary uses that are appropriate for their location and context. In designated centres (for example Walthamstow and Leytonstone) site allocations will include appropriate mixes of new homes (including plan-led student housing where appropriate to support the University of Portsmouth), retail, employment, leisure/culture and workspace that will foster innovation and enterprise. The guidance and requirements for Town Centre site allocations will be informed by, and reflected in, the delivery focused Town Centre Frameworks that are currently in development through engagement with Ward councillors. The Town Centre Frameworks will also include proposals for public realm enhancements outside site allocations and guidance on how existing business and community partnerships can be supported to flourish.
- 3.17 Both in Town Centres and elsewhere across the borough, site allocations will also be used to set clear expectations for the delivery of social and community infrastructure.
- 3.18 There are also locations in the borough that are protected for industrial uses only, to secure their important role in the local economy, and in many cases the wider city. In these locations, site allocations will be used to protect these industrial functions and encourage intensification and modernisation to meet our need for future provision of employment floor space.
- 3.19 Placemaking Plans and written site requirements will accompany each site allocation to clearly express what is required to be delivered on site. These will include the creation of new connections through sites, the delivery of new open, green spaces and public realm, and opportunities for biodiversity enhancements.
- 3.20 Sites that have already started construction following grant of planning permission but are not yet completed will still be allocated to allow for any unforeseen circumstances in delivery and ensure that the Council's requirements remain clear. They will, however, be presented in less detail than those sites where development has not yet been granted planning permission or started construction, given they have been through the detailed planning process and associated public consultation.
- 3.21 Once submitted for independent examination, the appointed Inspector will consider whether the necessary legal and procedural requirements have been complied with and whether the plan is 'sound'. The four tests of soundness are set out in paragraph 35 of the National Planning Policy Framework (NPPF) as follows:
- Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need

from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

- Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

#### Highams Park Planning Forum

- 3.22 Cabinet is asked to agree the recommendation to redesignate the Highams Park Planning Group as a Neighbourhood Forum.
- 3.23 Neighbourhood Planning gives communities the opportunity to plan for their local area, to decide what the places within their designated boundary should look like and define how the neighbourhood should grow and change in the future. Neighbourhood Planning gives communities the opportunity to set out objectives such as:
- Developing a shared vision for their neighbourhood;
  - Choosing where new homes, shops, offices, and other development should be built;
  - Identifying and protecting local green spaces; and
  - Having a say on what new buildings should look like.
- 3.24 Neighbourhood Plans must be in general conformity with the policies contained in the Waltham Forest Local Plan, the London Plan and National Planning Policy.
- 3.25 In Waltham Forest, the Highams Park Planning Group is the only designated Neighbourhood Forum, empowered to lead the neighbourhood planning process in their area. Both the group and their Neighbourhood Planning area were originally designated 15 July 2014. Neighbourhood forums must be officially redesignated every five years or their forum designation will expire (area designations do not expire). The Highams Park Planning Group were redesignated as a Neighbourhood Forum on 8 July 2019, and the Highams Park Neighbourhood Plan they prepared was approved through a local referendum on 5 March 2020, and adopted by the Council on 21 May 2020.
- 3.26 Given they were previously designated in 2019, the Highams Park Planning Group are now seeking redesignation again. The statutory 6 week consultation on their application for redesignation was carried out between May 6<sup>th</sup> and June 14<sup>th</sup> 2024.

3.27 154 consultation responses were received in total. 151 were in support of redesignation and none were opposed. There were 3 comments that were neutral on the subject, from statutory consultees. Those in support made comments on the following themes:

- Support for the Highams Park Planning Group and the amount of community and planning work that they do.
- Support for the redesignation of the Highams Park Planning Group.
- Recognition that the group often goes above and beyond neighbourhood planning and undertakes extra tasks such as litter clearing of public places including the Highams park lake and surrounding areas. They have also organised inclusive social events in the Highams Park area including picnic in the park and other similar all family events.
- Acknowledgement that the group support and improve the area.

3.28 To be designated as a Neighbourhood Forum, a group or organisation must comply with the prescribed conditions set out in section 61F (5) of the Town and Country Planning Act 1990 (as amended). The Council must be satisfied that (a) the organisation or group has been established for the express purpose of promoting or improving the social, economic and environmental well-being of the area, (b) its membership (minimum 21 persons) is made up of individuals who live or work in the area or are elected members whose area falls within the neighbourhood area concerned, (c) membership is drawn from different parts/sections of the community and (d) has a written constitution.

3.29 The Council is satisfied that these conditions have been for the following reasons:

- a) The group's written constitution clearly states that it was established for the purpose of promoting or improving the social, economic and environmental well-being of Highams Park - the neighbourhood area to which it relates.
- b) The group's constitution also confirms that membership is open to all who live or work in the Highams Park area, including elected members of Waltham Forest Council, although the latter would not normally serve on the Coordinating Committee unless specifically elected to do so. The Forum has over 1,000 members, which is far in excess of the minimum of 21 required. They have confirmed that each individual member lives or works in Highams Park, or is an elected member. Currently two elected members serve on the Coordinating Committee.
- c) Given the high membership number, the Council is satisfied that membership is drawn from different parts of the community that are eligible to join.
- d) The forum has a written constitution, the latest version of which was adopted at the Annual General Meeting held on 11th October 2023. This version of the constitution contains some minor modifications to the Forum's original constitution dated 11<sup>th</sup> January 2014.

3.30 Should Cabinet agree the recommendation to redesignate the Highams Park Planning Group as a Neighbourhood Forum, the designation will last for five years. During the designation period, it will not be possible to designate any other organisation or body to prepare a plan for any part of that area until the designation has either expired or been withdrawn.

3.31 Should Cabinet agree the recommendation to redesignate the Highams Park Planning Group, the designation will be publicised on the Council's website.

#### 4. Options & Alternatives Considered

4.1 It is a statutory requirement for all Local Planning Authorities to prepare a Local Plan and ensure that it is up to date. There are no alternatives.

4.2 The absence of an up to date Local Plan would leave the Council in a weaker position in securing high quality inclusive growth in the most suitable locations, and defending planning decisions at appeal. It would also leave the Council at risk of Government intervention in decision making and undesirable ad-hoc applications for development that would be more difficult to manage.

4.3 The Council should aim to designate a neighbourhood forum applied for but this is discretionary. If refused, a statement setting out the decision and the reasons must be provided. It is considered that the Highams Park Planning Group should be redesignated as a Neighbourhood Forum for the reasons given above.

#### 5. Council Strategic Priorities (and other National or Local Policies or Strategies)

5.1 The new Waltham Forest Local Plan provides an Inclusive Growth framework that will reduce inequalities and deliver benefits for all communities across the borough, in line with all six Mission Waltham Forest Borough Missions. Through the allocation of sites for a range of uses (including the provision of infrastructure and open space), subject to carefully drafted site requirements and placemaking principles that respond to the specific conditions and context of each site, the council can direct the right type of planned, inclusive growth to the right sites. This will make a significant contribution to all six Mission Waltham Forest Borough Missions:

- Allocating sites for new homes to meet the borough's housing need is crucial in tackling the housing crisis head on;
- Allocating commercial/employment floorspace will help us build an economy that works for everyone;
- Ensuring the delivery of community space, social infrastructure and new open space and public realm will give every family and every child every opportunity, and lead the way for a net-zero borough; and



- Establishing the right placemaking principles will enhance safe, green neighbourhoods where everyone can thrive, and make Waltham Forest a great place to live and age well.
- 5.2 In order to be found sound at Examination in Public, Local Plans must meet the procedural and legal requirements and be consistent with national policy and in general conformity with the London Plan.
6. Consultation
- 6.1.1 Local Plan Part 2 is at a relatively advanced stage of production and has already been informed by several previous rounds of consultation and engagement with the public, statutory consultees and other stakeholders. Throughout the preparation of Local Plan Part 2 and the review of the supporting IDP, Officers have also consulted internal stakeholders and other Council services, including Health Services, Social Care, Emergency Services, Culture and Community facilities, Open Space, Recreation and Leisure, Utilities and Waste Management.
- 6.1.2 Elected Members' involvement began with the Local Plan Members Advisory Group (LPMAG), formed to steer production of Local Plan Part 1, and then asked to review the emerging Part 2 prior to the previous 'Regulation 19' consultation. To inform the current review Ward Councillor engagement was carried out on the following dates:
- 15th Nov 2023 and 20<sup>th</sup> May 2024: Ward Councillors from South Waltham Forest
  - 20th Nov 2023 and 20<sup>th</sup> May 2024: Ward Councillors from Central Waltham Forest
  - 4th Dec 2023 and 13<sup>th</sup> May 2024: Ward Councillors from North Waltham Forest
- 6.1.3 These engagement sessions have informed the further development of Local Plan Part 2, including the addition of further sites.
- 6.1.4 Local Plan Part 2 has also been considered by Growth Scrutiny Committee in January 2023 and, most recently, in March 2024.
- 6.1.5 The Council also has a duty to engage with statutory consultees, including national organisations such as Natural England, the GLA and neighbouring boroughs. Officers engage with these bodies on a regular basis through direct contact. Wherever possible, 'Statements of Common Ground' will be agreed with prescribed bodies, as they were during the independent examination of Local Plan Part 1.
- 6.1.6 The new and updated evidence prepared in support of Local Plan Part 1 already has the support of the Greater London Authority (GLA), Natural England, the Environment Agency, the City of London (as Conservators of Epping Forest) and the Lea Valley Regional Park Authority.
- 6.1.7 Consultation on the updated "Proposed Submission Version" of the Local Plan Part 2 is planned for summer 2024, subject to Cabinet approval.

6.1.8 As set out above the redesignation of the Highams Park Planning Group was consulted upon as per the statutory requirement from 6th May to 14th June.

## 7. Implications

### 7.1 Finance, Value for Money and Risk

7.1.1 The cost of consultation and examination covers evidence base documents, publication costs, statutory advertisement, and the independent examination (including Inspector costs and that of the Examination Programme Officer). These costs are additional to that already committed on the preparation of Local Plan (Part 1) and will be funded from existing Local Plan budgets.

7.1.2 Well planned, inclusive and sustainable growth, as directed by the new Local Plan, will generate revenue, through - for example - additional Council tax and business rates. Early modelling of Local Plan Part 1 suggested that circa £30 million additional Council Tax revenue could be generated by 2031/32. The planned and inclusive growth proposed will also result in increased Community Infrastructure Levy (CIL) income to be invested in the supporting infrastructure that the borough needs. Early modelling of Local Plan Part 1 suggested that circa £74 million CIL could be generated by 2031/32. The inclusive growth promoted by the Local Plan will also reduce Council costs, for example by delivering new affordable homes that will allow households to move out of Temporary Accommodation

7.1.3 The Government offers Local Planning Authorities (LPAs) some financial support for neighbourhood planning. In relation to Forum designation, LPAs can claim £5,000 for the first five neighbourhood forums they designate only. The limit of five forums applies to the total number of areas designated in the LPA (i.e. it includes claims made in the past for forums designated) and includes the re-designation of forums.

### 7.2 Legal

7.2.1 The Planning and Compulsory Purchase Act 2004 (as amended) (“the 2004 Act”) and the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) (“the 2012 Regulations”) set out the requirements and the statutory procedure for the preparation of a Local Plan.

7.2.2 Under Regulation 19 of the 2012 Regulations, before a local planning authority can submit a development plan document to the Secretary of State for independent examination, it must publish and make available: (i) the documents it proposes to submit and (ii) a statement detailing how representations on the Plan can be made. Hard copies of the documents must be made available for public inspection at the authority’s principal office and at such other places as the authority considers appropriate. Documents are also required to be made available on the authority’s website.

7.2.3 Once submitted for independent examination, the appointed Inspector will consider whether the necessary legal requirements have been complied with and whether the Plan is 'sound'. The four tests of soundness are set out in paragraph 35 of the National Planning Policy Framework (NPPF).

7.2.4 A further key requirement is that the Plan must be in general conformity with the London Plan (section 24 of the 2004 Act). The Mayor of London's view on this will be sought as part of the Regulation 19 consultation.

#### Highams Park Planning Forum

7.2.5 The Neighbourhood Planning (General) Regulations 2012 (as amended) ("the Regulations") set out the procedure for designating neighbourhood forums; they also prescribe the content of applications and the consultation and publicity requirements.

7.2.6 Regulation 9 requires the Council, on receipt of an application, to publish on its website and in such other manner as considered likely to bring the application to the attention of local people: (a) a copy of the application (b) an explanatory note and (c) details of how to make representations (at least 6 weeks must be given for representations to be submitted).

7.2.7 To be designated as a Neighbourhood Forum, a group or organisation must comply with the prescribed conditions set out in section 61F(5) of the Town and Country Planning Act 1990 (as amended), these are set out in paragraph 3.28 above and if they are not met the application will be refused.

7.2.8 Regulation 10 requires the Council as soon as possible after designating a neighbourhood forum, to publish in the manner outlined in paragraph 7.2.6: (a) the name of the neighbourhood forum (b) a copy of the written constitution of the forum, (c) the name of the neighbourhood area to which the designation relates and (d) contact details for at least one member of the forum. If designation is refused a document must be published in the manner outlined in paragraph 7.2.6 setting out the decision and reasons and details of where and when the refusal statement may be inspected.

### 7.3 Equalities and Diversity

7.3.1 The Council must, in the exercise of its functions, have due regard to the need to eliminate discrimination, harassment and victimisation, and to advance equality of opportunity, and foster good relations, between those who share a relevant protected characteristic and those who do not share it (section 149 Equality Act 2010). The Council has a duty to have due regard to the need to remove or minimise disadvantages, take steps to meet needs, in particular steps to take account of disabled persons' disabilities, and encourage people to participate in public life. The Council must have due regard to the need to tackle prejudice and promote understanding.

7.3.2 The new Waltham Forest Local Plan, both Parts 1 and 2 will provide a strategic framework to help deliver the new homes, jobs and

infrastructure that the borough needs, for the benefit of all residents and communities - including those who share the characteristics protected by the Equality Act 2010.

7.3.3 This has been a priority throughout the preparation of the Plan. A full Equalities Impact Assessment was undertaken of the submission version of the Local Plan Part 1 in November 2020 (Appendix 3). This concludes that, overall the Plan would have a neutral or positive impact on Protected Characteristic Groups and that in many instances it could help to mitigate current barriers and advance equality of opportunity for specific groups. A new Equalities Impact Assessment has been undertaken for Local Plan Part 2 (Appendix 4). As Part 2 adds more detail and certainty to the spatial vision and policies of Part 1, this assessment sees further enhancements of the equalities impacts of the Plan as a whole.

7.4 Sustainability (including climate change, health, crime and disorder)

7.4.1 Climate emergency policies are embedded in the Local Plan through several policies included in Part 1. Examples include policies that seek to reduce emissions by promoting sustainable transport, encourage sustainable design and construction, address the risk of flooding and overheating and protect the natural and open environment.

7.4.2 Local Plan Part 2 has a complementary role to Part 1. It takes its lead from this document seeking to deliver the strategic policies at site specific level. The planning applications process will provide opportunity for climate change policy implications to be applied and tested on specific sites. In accordance with legal requirements on plan making, the Plan must be supported by a Sustainability Appraisal which includes Strategic Environmental Assessment, and Habitats Regulations Assessment. All site-specific policies/proposals have been tested for sustainability impacts. These supporting documents will be published along with Local Plan 2 for consultation.

7.5 Council Infrastructure

7.5.1 None

Background Information (as defined by Local Government (Access to Information) Act 1985)

None