EXAMINATION OF THE BLACKHORSE LANE AREA ACTION PLAN
INSPECTOR’S INITIAL QUESTIONS TO THE COUNCIL

The following questions have arisen from my preliminary examination of the Blackhorse Lane Area Action Plan (AAP) and the supporting material, including the evidence base, which I feel are best dealt with in writing to avoid taking up valuable time in the Hearing. In the first instance I am seeking clarification about certain matters from the Council as the author of the AAP. They should not be taken as an indication of the relative importance of these points compared to others or whether they are critical to the soundness and legal compliance of the Plan. These will be set out in the matters and issues to be debated at the Hearing sessions. A list of these will be prepared in due course and will include matters not referred to here which have been raised in the representations.

In framing these questions I have had regard to the definition of soundness at paragraph 182 of the National Planning Policy Framework and the principles for Local Plans set out in paragraph 157, especially the first and fifth bullet points.

If the full answer to any question can be readily given by directing me to sections of the supporting evidence, then I am content for it to be dealt with in that way. Otherwise I would like a relatively brief but complete answer to each question which should be sent to the Programme Officer by Thursday 17 April 2014.

1. Has the Area Action Plan [AAP] been prepared in accordance with the statutory procedures including appropriate consultation, in line with the Council’s Local Development Scheme and Statement of Community Involvement?

2. Noting that the Major has confirmed in writing that the AAP ‘is a welcome policy document that is considered to be in general conformity with the London Plan’, are you aware that the Greater London Authority has any outstanding issues in relation to the density and/or scale of development proposed? If not, could a Statement of Common Ground be submitted?

3. Noting the Post Publication Modifications that have been proposed, it might be helpful if the Council could agree a Statement of Common Ground with those respondents who raised concerns in the last round of consultation in order to ascertain whether they have been addressed.

4. Do: (i) the Revised Early Minor Alterations to the London Plan [REMA], which were published on 11 October 2013; or (ii) the Further Alterations to the London Plan [FALP], acknowledging that these are in draft and the subject of current public consultation, have any implications for the AAP?

5. The Key Diagram is opposite the Vision and reads as part of it. Should the Key Diagram show the AAP boundary and entrances to Walthamstow Wetlands? [Note: BHLSD5 on page 34, Rep No bhlps48, appears to say you would amend Fig 4 to show “proposed entrances to Walthamstow Wetlands”, but revised Fig 4 in BHLSD2, page 9, does not do this].

6. Appendix 3 lists “Policy Map Changes”. Can the Council confirm that no other plans, policy documents or other guidance will require modification on adoption? Amongst other things, what would happen to the Interim Planning Policy Framework and the Planning and Design Brief for the Station Hub and Waterfront? If there are further changes, might it be better for Appendix 3 to be put on a more generic footing to list them?
7. Is the AAP consistent with the recently issued Planning Practice Guidance?

8. Recognising that further changes could arise as a result of the hearing(s), please could the Council confirm that in accordance with section 20(7C) of the Planning and Compulsory Purchase Act 2004 (as amended) that it requests that I should recommend any main modifications needed to rectify matters that make the AAP unsound and/or not legally compliant and incapable of being adopted.