London Borough of Waltham Forest
Submission Local Plan Part 1
Sustainability Appraisal Report

Non-Technical Summary

Date: 28th April 2021

Prepared by:

ClearLead Consulting Limited

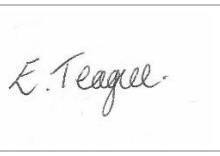
The Barn, Cadhay, Ottery St Mary, Devon EX11 1QT

www.clearleadconsulting.com

01404 814273

clearlead

Quality Management

Issue/revision	Issue 1	Issue 2
Report Status	Draft	Final for submission
Date	23/04/21	28/04/21
Prepared by	I Teague	I Teague / V Pearson
Signature		
Checked by	J Mitchell	J Mitchell
Signature		
Authorised by	J Mitchell	J Mitchell
Signature		
Project number	C0093	

LIMITATIONS

This report has been prepared by ClearLead Consulting Limited solely for the use of the Client and those parties with whom a warranty agreement has been executed, or with whom an assignment has been agreed. Should any third party wish to use or rely upon the contents of the report, written approval must be sought from ClearLead Consulting Limited; a charge may be levied against such approval.

ClearLead Consulting Limited accepts no responsibility or liability for:

a) the consequences of this document being used for any purpose or project other than for which it was commissioned, and
b) the use of this document by any third party with whom an agreement has not been executed.

The work undertaken to provide the basis of this report comprised a study of available documented information from a variety of sources (including the Client) and discussions with relevant authorities and other interested parties. The opinions given in this report have been dictated by the finite data on which they are based and are relevant only to the purpose for which the report was commissioned. The information reviewed should not be considered exhaustive and has been accepted in good faith as providing true and representative data pertaining to site conditions. Should additional information become available which may affect the opinions expressed in this report, ClearLead Consulting Limited reserves the right to review such information and, if warranted, to modify the opinions accordingly.

It should be noted that any recommendations identified in this report are based on information provided by the Client and as gathered during the site survey. In some cases access cannot be granted to all areas of the site, in these instances and in the absence of information to the contrary, ClearLead Consulting Limited will use the information provided to complete the report.

ISOQAR REGISTERED UKAS MANAGEMENT SYSTEMS 0026

ISO 9001
ISO 14001
OHSAS 18001

Certificate Number. 16135

clearlead

Table of Contents

1 Introduction 1
1.1 What is a Sustainability Appraisal? 1
1.2 Waltham Forest Borough Council Local Plan 2
1.3 Strategic Objectives of the Local Plan Part 1 (LP1) 3
1.4 What is the current situation in the Local Plan Area? 8
2 How the Plan and its Alternatives Were Assessed 17
3 Assessment of Alternatives and the Reasons for Choosing the Plan 18
3.1 Introduction 18
3.2 Appraisal of the Local Plan Strategic Options 18
3.3 Appraisal of the Local Plan Spatial Strategy Options 19
4 Sustainability Assessment of the Local Plan 21
4.1 Policy Assessment 21
4.3 Potential Cumulative effects 27
4.4 Mitigation 29
5 Monitoring 30
6 Next Steps 32

1 Introduction

This Non-Technical Summary (NTS) summarises the findings of the Sustainability Appraisal (SA) Report for the Submission version of the Local Plan Part 1 (LP1) which has been prepared by the London Borough of Waltham Forest Council. ClearLead Consulting Ltd were commissioned by London Borough of Waltham Forest to undertake the SA of LP1. The Submission version of the Local Plan takes into account changes resulting from new information and in response to issues raised during public consultation on the Draft Local Plan in 2019 and the Proposed Submission Local Plan at the end of 2020.

A new Local Plan is needed to support the Council's aspirations for growth, including significant new housing and sustained economic growth, to provide jobs for local people and increase the supply of housing, including affordable units. The Local Plan will guide development in the Borough and when adopted, will replace the currently adopted Core Strategy for the London Borough of Waltham Forest.

LP1 is the overarching strategic policy document and Part 2 of the Local Plan (LP2) is the Site Allocations Document which is being prepared separately. LP1 contains policies which set out the level of growth to be delivered over the plan period, a spatial strategy including strategic development locations and development management policies.

The SA Report accompanies LP1. The SA plays an important role in the evolution of the plan and consideration of all reasonable alternatives.

1.1 What is a Sustainability Appraisal?

An SA has been undertaken on the LP1 as required by the Environmental Assessment of Plans and Programmes Regulations, 2004 (the SEA Regulations). SA is used to evaluate Local Plans against a set of objectives developed in consultation with interested parties. The purpose of the assessment is to avoid adverse environmental, social and economic effects, as well as identifying opportunities to improve the quality of Waltham Forest and the quality of life of residents in the Borough.

This SA sets out the appraisal of the spatial strategy policies and thematic policies LP1and the potential impact they could have on the three elements of sustainability: economy, environment and society.

The SA also sets out the alternative options previously assessed as part of the development of LP1.

Another separate assessment called a Habitats Regulations Assessment (HRA) has been undertaken which provides information on potential effects on European designated sites (of which there are two within the Waltham Forest boundary). The findings of the HRA have been incorporated into the SA.

1.2 Waltham Forest Borough Council Local Plan

The Council has aspirations for growth, including significant new housing and sustained economic growth, to provide jobs for local people and increase the supply of housing, including affordable units. The Waltham Forest LP1 sets targets to deliver 27,000 additional homes and 52,000m^2 of employment floorspace in Waltham Forest by 2035. This growth will be focussed in three distinct areas: the South, Central and the North of the Borough.

Prior to the preparation of the Submission LP1, three consultation stages have been undertaken as follows:

- Direction of Travel issues and options document in November – December 2017;
- Draft Local Plan in July – September 2019; and
- Proposed Submission LP1 in October – December 2020.

The content of the Submission version of LP1 is based is built on the requirements of national planning policy, the Council's evidence base and outcomes of the previous consultations.

The Vision for LP1 is shown in Box 1 below:

Box 1: Walthamstow Local Plan Vision

Waltham Forest in 2035

Waltham Forest is a key part of London and a rich resource for the growing capital city. Over the life of this plan, the Borough will be transformed. Building on its strengths as part of the capital and its outer fringe, by 2035, the Borough will be a network of enterprising, culturally rich, well designed sustainable neighbourhoods, building on the identities of our historic 8 town centres and the communities that have grown up around them. It will attract people from across London and further afield to enjoy its cultural, creative and heritage attractions, greenspaces and recreational opportunities.

Liveable Waltham Forest

Waltham Forest's vibrant network of distinctive and thriving town centres will be cultural community hubs, bringing the city to the suburbs and supporting creative, healthy and active lifestyles. A new vision of urban living is in place where all residents are able to meet most of their needs within a 15-minute walk or cycle from their homes. Building on the success of Enjoy Waltham Forest, the Borough's extensive network of green spaces including forest, open space, Green flagged parks, neighbourhood and pocket parks and urban space will help to connect these centres to new liveable neighbourhoods by integrated walking and cycling routes and improved public transport. These liveable neighbourhoods will include a choice and mix of genuinely affordable new homes, which along with an increasing number of local jobs will realise the Plan's ambitions to make the Borough the model of new metropolitan cultural suburbs.

Growing a creative, diverse and resilient economy in Waltham Forest

Attracting inward investment into Waltham Forest's dynamic economy is central to delivering transformational good growth and the success of this Plan. Successful growth in Waltham Forest will focus on improving life chances and job opportunities for its residents.

The Borough will maximise the advantages of its access to the most economically vibrant parts of London and its position in the UK Innovation Corridor (London-Stansted-Cambridge) to grow its own creative and cultural economy. Building on its growing and strongest sectors, Waltham Forest will be a leader in the capital's cultural, creative and digital economy, cementing its economic stability and resilience; extending its economic offer and helping residents to achieve their potential.

Waltham Forest as a place of leisure

Waltham Forest will be one of London's top locations for leisure and recreation. The Borough's diverse visitor attractions, (such as the William Morris Gallery, Walthamstow Wetlands and Victoria Halls) its places, cultural offer and green and blue assets which include access to Epping Forest, the Lee Valley Regional Park, reservoirs and marshland are for residents and all to enjoy.

A key ambition of this Plan is to promote the Borough as a vibrant place to live and visit. We aim to deliver a diverse and inclusive 24/7 economy in Waltham Forest's town centres (where appropriate) and culture venues, building a cultural legacy celebrating the creativity of the Borough's communities.

1.3 Strategic Objectives of the Local Plan Part 1 (LP1)

There are 15 strategic objectives that will deliver the vision for Waltham Forest by 2035, as shown in Box 2 below:

Box 2: Walthamstow Local Plan Strategic Objectives

There are 15 strategic objectives that will deliver the vision for Waltham Forest by 2035, these are:

1. Ensure a significant increase in the supply, choice and mix of high quality new homes, in particular delivering genuinely affordable homes to enable and encourage residents to stay in the Borough and strengthen communities.
2. Grow, promote and diversify Waltham Forest's economy, including its dynamic, cultural, creative and digital sectors and its role in the Upper Lee Valley and wider UK Innovation Corridor, by both supporting and nurturing indigenous growth as well as attracting inward investment.
3. Improve life chances by improving job opportunities, upskilling residents and providing access to new skills, training and apprenticeship opportunities locally and elsewhere, creating wealth in a successful metropolis.
4. Support Waltham Forest's network of thriving, safe and attractive town centres, maintaining the distinctive role of each and making them accessible to all, making sure that residents are able to meet their shopping, work, service, recreational and cultural needs within a 15-minute walk or cycle.
5. Ensure timely, strategic and local infrastructure investment and delivery to support good sustainable growth for communities both now and in the future, through working with partners, investors, developers and providers.
6. Ensure that the Borough's cultural legacy and creative economy flourish and grow and investment is secured to improve life chances, quality of life and well-being for all.
7. Improve the health and wellbeing of all who live, study and work in Waltham Forest.

8. Improve active and sustainable transport choices across the Borough and beyond building on the success of the 'Enjoy Waltham Forest programme', encouraging wider integrated walking and cycling routes.
9. Promote exemplary standards of design in place-making and the highest quality of development.
10. Ensure Waltham Forest's network of cultural, inclusive and sustainable neighbourhoods are safe and diverse, celebrating their locally distinctive character and heritage.
11. Develop a multi-functional network of green and blue infrastructure to deliver benefits for all, including, where appropriate, increased public access.
12. Protect, restore and enhance the Borough's natural environment to sustain biodiversity, habitats and species of conservation importance.
13. Work with partners to protect and enhance the adjoining areas of regional, national and international natural importance in Epping Forest and the Lee Valley Regional Park.
14. Waltham Forest builds its resilience through addressing sustainability, efficient waste management and the effects of climate change through all stages in the development process.
15. To preserve and enhance the Historic built and natural environment and celebrate its locally distinctive character and heritage.

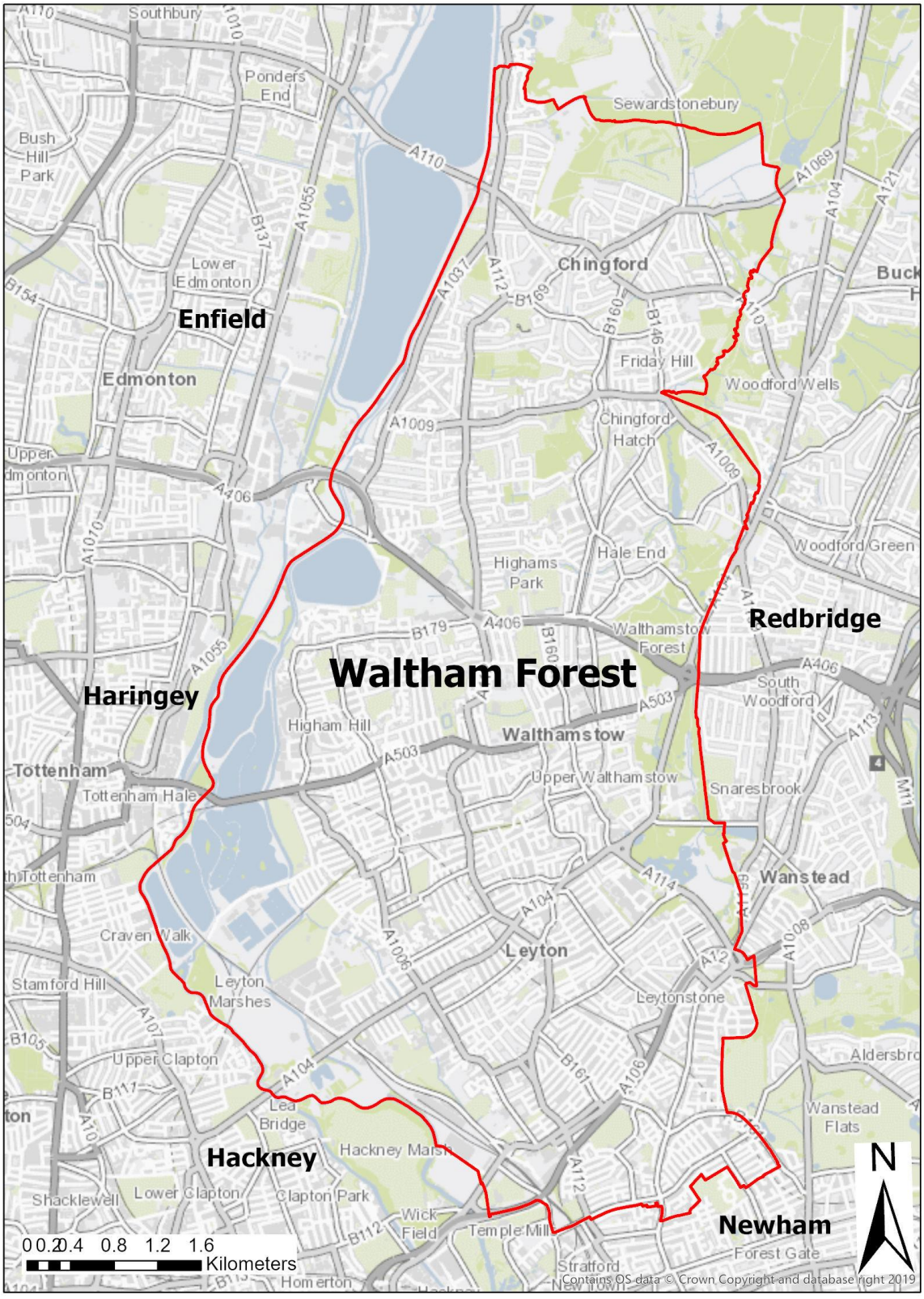


Figure 1: Waltham Forest Local Plan Boundary

Table NTS1 lists the spatial strategy policies included in the LP1 which have been assessed as part of this SA.

Table NTS1: Submission LP1 Spatial Strategy Policies

Policy number	Policy name
Policy 1	Presumption in Favour of Sustainable Development
Policy 2	Scale of Growth
Policy 3	Infrastructure for Growth
Policy 4	Location of Growth
Policy 5	Management of Growth
Policy 6	Ensuring Good Growth
Policy 7	Encouraging Mixed Use Development
Policy 8	Character-led Intensification
Policy 9	South Waltham Forest
Policy 10	Central Waltham Forest
Policy 11	North Waltham Forest

Table NTS2 lists the thematic policies included in the LP1 which have been assessed as part of this SA.

Table NTS2: Submission LP1 Thematic Policies

Policy number	Policy name
Policy 12	Increasing Housing Supply
Policy 13	Delivering Genuinely Affordable Housing
Policy 14	Affordable Housing Tenure
Policy 15	Housing Size and Mix
Policy 16	Accessible and Adaptable Housing
Policy 17	Redevelopment and Intensification of Existing Housing Estates
Policy 18	Other Forms of Housing
Policy 19	Small Sites
Policy 20	Housing in Multiple Occupation (HMO) and Conversions
Policy 21	Downsizing
Policy 22	Supported and Specialist Accommodation
Policy 23	Gypsies and Travellers
Policy 24	Community Housing
Policy 25	Supporting Economic Growth and Jobs
Policy 26	Safeguarding and Managing Strategic Industrial Land (SIL)
Policy 27	Safeguarding and Managing Change in Locally Significant Industrial Land (LSIL)
Policy 28	Safeguarding and Managing Change in Borough Employment Areas
Policy 29	Approach to Non-Designated Employment Land
Policy 30	Industrial Masterplan Approach
Policy 31	Co-location Design Principles
Policy 32	Workspaces
Policy 33	Affordable Workspace
Policy 34	Local Jobs, Skills, Training and Procurement
Policy 35	Railway Arches
Policy 36	Promoting Culture and Creativity
Policy 37	Protecting Public Houses (Pubs)
Policy 38	Blackhorse Lane Creative Enterprise Zone

Policy number	Policy name
Policy 39	Hierarchy of Centres
Policy 40	New Retail, Office and Leisure Developments
Policy 41	Revitalisation, Adaptation and Regeneration in Designated Centres and Parades
Policy 42	Managing Changes of Use in Primary Shopping Areas
Policy 43	Managing Changes of Use Outside Primary Shopping Areas of Designated Centres
Policy 44	Managing Changes of Use in Neighbourhood Centres and Local Retail Parades
Policy 45	Managing Changes of Use in Non-Designated Areas
Policy 46	Evening and Night-time Economy Uses
Policy 47	Shopfronts and Signage
Policy 48	Social and Community Infrastructure
Policy 49	Education and Childcare Facilities
Policy 50	Promoting Healthy Communities
Policy 51	Health Impact Assessment
Policy 52	Making Safer Places
Policy 53	Noise, Vibration and Light Pollution
Policy 54	Hot Food Takeaways
Policy 55	Betting Shops and Payday Loan Shops
Policy 56	Delivering High-Quality Design
Policy 57	Taller and Tall Buildings
Policy 58	Residential Space Standards
Policy 59	Amenity
Policy 60	Designing Out Crime
Policy 61	Advertisements, Hoarding and Signage
Policy 62	Promoting Sustainable Transport
Policy 63	Active Travel
Policy 64	Public Transport
Policy 65	Development and Transport Impacts
Policy 66	Deliveries, Freight and Servicing
Policy 67	Construction Logistics Plans (CLPs)
Policy 68	Managing Vehicle Traffic
Policy 69	Electric Vehicles (EV)
Policy 70	Utilities Infrastructure
Policy 71	Digital Infrastructure
Policy 72	Designated Heritage Assets
Policy 73	Listed Buildings
Policy 74	Conservation Areas
Policy 75	Archaeological Assets and Archaeological Priority Areas
Policy 76	Non-Designated Heritage Assets
Policy 77	Locally Listed Buildings
Policy 78	Highams Area of Special Character
Policy 79	Green Infrastructure and the Natural Environment
Policy 80	Parks Open Spaces and Recreation
Policy 81	Biodiversity and Geodiversity
Policy 82	Trees
Policy 83	The Epping Forest and the Epping Forest Special Area of Conservation
Policy 84	The Lee Valley Regional Park
Policy 85	Protecting and Enhancing Waterways and River Corridors
Policy 86	Food Growing Allotments
Policy 87	A Zero Carbon Borough
Policy 88	Decentralised Energy
Policy 89	Sustainable Design and Construction
Policy 90	Air Pollution

Policy number	Policy name
Policy 91	Water Quality and Water Resources
Policy 92	Contaminated Land
Policy 93	Managing Flood Risk
Policy 94	Overheating
Policy 95	Waste Management
Policy 96	Infrastructure and Developer Contributions
Policy 97	Monitoring Growth Targets

1.4 What is the current situation in the Local Plan Area?

In order to test whether the LP1 will contribute to improving the economic, social and environmental situation in Waltham Forest, we need to understand the how things are currently and how they might change without a Local Plan.

Table *NTS3* presents this information as the key sustainability issues currently affecting Waltham Forest. Table NTS3 also presents the predicted future evolution of the baseline without the LP1. Appendix B to the full SA Report presents the full review of baseline data for the Borough. Appendix A presents the review of other policies and plans which could have an influence or be affected by the development of the Local Plan.

Data relevant to Waltham Forest has been presented in the following categories:

- Population;
- Human Health;
- Economy;
- Employment and Skills;
- Transport;
- Crime and Safety;
- Housing;
- Townscape and Heritage;
- Climate;
- Air Quality;
- Soil and Geology;
- Water;
- Biodiversity;
- Landscape; and
- Waste.

The initial baseline data was gathered in April-July 2017. This baseline was then consulted on and updated in September 2017. The baseline was subsequently updated between January 2020 and August 2020. In some cases, the most recent data available, such as Census and SSSI condition data, is now in excess of five years old. This may not therefore reflect current trends within the borough. There have also been difficulties surrounding the Covid-19 pandemic. Quantitative data on the how the pandemic has impacted the baseline is limited, and the evolution of the future baseline in light of this is uncertain. No other difficulties have been encountered in collating the baseline data. Some assumptions have been made in the

assessments of the Local Plan. These assumptions are detailed within Section 2.5 of the full SA Report.

clearlead

Table NTS3: Sustainability Issues & Likely Evolution without the Submission LP1

Theme	Sustainability Issues	Likely Evolution Without the Local Plan
Population	• As the population continues to increase so does the demand for housing, infrastructure, facilities and employment. • The population density within the Borough exceeds both the London and the national averages. • There is a need to create high quality places to live, work and recreate that are mixed and well-balanced in terms of tenure and income. • Adequate support and facilities for older residents, including independent living, has been noted in particular to be needed. • There is a need to build on the Borough's arts, culture and sport strengths across the Borough's diverse and changing population. • There is a need to provide inclusive services; promote equal opportunities; oppose discrimination, intolerance and disadvantage through reducing inequalities and promoting community cohesion. • There is a need to reduce the number of older people who feel socially isolated, by getting them actively participating in community life.	• There is likely to be an increase in housing demand due the continued population increase within the Borough. • Continuing pressure to provide inclusive services which can meet the needs of all local residents. • An increased demand for healthcare of those over 50.

Theme	Sustainability Issues	Likely Evolution Without the Local Plan
Human Health	• Currently a large proportion of the population are aged over 50 and this is projected to rise over the next 20 years (+26% rise by 20211). • Inequalities in health and life expectancy between ethnic groups. • Disparities between wards, particularly between the north and south of the Borough; • Improve life expectancies through promoting healthy lifestyles for all ages. • Need to ensure adequate access to green spaces and recreational facilities to promote active and healthy lifestyles. • Promote high quality housing with a range of tenures to reduce health issues which arise from poor quality accommodation. • Need to increase recognition of the growing evidence of a relationship between physical and mental health. • Need to increase levels of active travel throughout the Borough in order to increase physical activity levels and tackle poor air quality. • Need to ensure that hospitals have fit for purpose facilities (i.e. less converted houses) that meet the needs of patients.	• There may be additional strain placed on the Borough's health and social care resources due to the continual growth of proportion of the population over 50. • The disparity between wards with regards to deprivation, overcrowding and poverty could widen • Mental health issue of residents is expected to increase in severity and incidence, especially in those over 65. This could increase hospital admissions.

[1] GLA, 2015 Population projections

Theme	Sustainability Issues	Likely Evolution Without the Local Plan
Economy	• Action is needed to provide more support for business start-ups because only 71% of new businesses in the Borough survive more than 2 years. • Ensure that ongoing business growth becomes a driver of productivity and fairer wages (e.g. encouraging the London Living Wage), in order to create an increase in the overall prosperity of the Waltham Forest Borough. • Continue to support the Upper Lee Valley Development Opportunity Area and celebrate its industrial heritage. • Support development of successful neighbourhoods. • Need to ensure that growth supports the delivery of vital infrastructure and new facilities across the Borough. • Further action is needed in order to support and promote retail, business, cultural, leisure and residential investment in town centres. • There are likely to be ongoing pressures on industrial sites, need to maintain industrial uses and promote strong local base of small businesses. • Need to provide additional workspaces and promote denser, mixed use development with no net loss of business floor space.	• Pressure on industrial areas to provide business space may increase due to an increase in population and businesses within the Borough. • There may be increased pressure on employment land for housing development, as the population of Waltham Forest continues to rise.

Theme	Sustainability Issues	Likely Evolution Without the Local Plan
Employment and Skills	• Investment is needed so that local people have the skills and ability to seize local growth opportunities and they are able to access and progress into high-quality, better paid employment in the Borough. • There are large inequalities in employment and skill levels. between wards within the Borough. Need to ensure that regeneration is inclusive. • Need to ensure that all residents have access to training and skills development to enable them to access and progress into high quality employment. • Skills development in growth areas is also needed both for those who are currently unemployed or underemployed. • Encourage and promote flexible working arrangements for residents to support people when gaining skills and moving into employment. • In work support is needed to ensure sustainment of jobs, professional development and progression into better paid, secure higher quality jobs. • Need to promote employment, training programmes and sector-based initiatives in the growth of skills to support creative and digital industries, construction and facilities management, retail and hospitality, and finance and business services.	• Disparities in employment levels between wards may continue to widen. • Opportunities for new businesses in the area may not arise, preventing an increase in employment and demand for higher educated employees.
Transport	• Need to work towards improving air quality and reducing noise impacts from transport. • There is a need to make public transport more accessible in some areas of the Borough. • There is a need to promote walking and cycling (building on Enjoy Waltham Forest (“Mini Holland”) programmes) for local journeys in place of travel by private car. There should also be a focus on promoting public transport use instead of cars for medium and longer journeys. • There is a need to reduce car parking spaces in order to discourage private car use and improve air quality. • One in five journeys each weekday morning and afternoon involves trips to school, even though most journeys to schools are under a mile. There is a need to reduce school journeys by	• Rise in car ownership is expected to continue • Inadequate electric vehicle infrastructure

Theme	Sustainability Issues	Likely Evolution Without the Local Plan
	reducing Drop Off/Pick Up arrangements for new school developments, and encouraging sustainable, active travel amongst school pupils. • There is a need to provide electric vehicle infrastructure, such as charging points. • As the population grows, so does the need to change current infrastructure to meet the demands of all residents, whilst making it future proof. • Need to provide public transport capacity and safeguard land for transport. • Help to enhance London's transport connectivity. • Improvements to road safety are needed to reduce casualties. • Need to make cycle parking safer and easier to use.	
Crime and Safety	• Increase in racist and religious hate crimes; • The percentage of residents in the borough that are worried about crime remains higher than the London average; • Need to provide safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life. • Need to develop an approach to tackling crime, improving liveability and reducing anti-social behaviour.	• Continued increase in racist and religious hate crime.
Housing	• There is a disparity between the cost of housing and the amount that people are able to borrow to purchase a home, which means that many people are unable to access the property market. • There is a shortfall in the provision of affordable housing to meet the requirements of those in housing need. • 28% of households are unsuitably housed; there is a potential shortfall in the provision of family accommodation and there is overcrowding, primarily in the private rental sector. • Homelessness is expected to increase. • Need to offer greater quality, flexibility and choice to those who rent. • Need to increase the supply of well-designed housing of all tenures. • Need to introduce more flexible approaches for affordable housing contributions to encourage open market and mixed tenure specialist older people's housing.	• House prices will continue to rise above the London average, making it increasingly difficult for low income households to purchase property.

Theme	Sustainability Issues	Likely Evolution Without the Local Plan
Townscape and Heritage	• A number of listed buildings are identified as being in poor condition and are have been included on Historic England's Heritage at Risk Register. Opportunities exist to improve the condition of some listed buildings through development. • Ensure that the Conservation Areas, Heritage Assets and features are preserved or enhanced. • New developments should respect the urban and historic context, improve townscape and leave a positive architectural legacy. • Impacts of future development on the local historic environment need to be considered. • Heritage assets should be managed to sustain their significance. • Ensure that everyone is able to participate in understanding and sustaining their local historic environment. • Development could encroach on Conservation Areas and subsequently negatively affect townscape and heritage assets.	• Development may encroach on conservation area and could negatively affect townscape and heritage areas. • Assets on the Heritage at Risk register may not be improved in condition.
Climate	• Reliance on the petrol or diesel-fuelled private car as the main mode of transport. • Greenhouse gas emissions need to be stabilised and reduced over time. • Need to provide electric vehicle infrastructure, such as charging points. • Need to plan for and implement/facilitate climate change adaptation, in respect of rising temperatures, water scarcity and extreme weather events, particularly heavy rainfall/flooding. • Need to continue to promote the construction of energy efficient buildings, and to support the installation of renewable and low or zero carbon technology. • Need to plan and prepare for the expected impacts of unavoidable climate change by developing adaptation responses and building resilience. • New developments need to minimise vulnerability and provide resilience to climate change. • Need to work with communities to help tackle climate change. • Help promote low carbon heat network. • Need to identify opportunities for growth of the low carbon economy in the Upper Lee Valley.	• Greenhouse gas emissions could rise. • Increase in mean annual temperatures.

Theme	Sustainability Issues	Likely Evolution Without the Local Plan
Air Quality	• Need to help reduce pollution from road vehicles, buildings, industry and construction. • Reliance on the petrol or diesel-fuelled private car as the main mode of transport. • Air pollution from the strategic road network is an issue across the Borough and NO2 emissions have remained constant, not decreasing as predicted. • Increasing use of biofuels (biodiesel and biomass) will cause further air quality issues. • Need to improve efficacy of measures within the AQMA.	• Air pollution will continue to be an issue without intervention to change the fleet mix and reduce traffic volumes. • Electric car ownership is predicted to rise and this could improve air quality.
Soils and Geology	• There is finite availability of previously developed land for development; this may result in the use of greenfield land in the future. • There is a need to protect soils and the important ecosystem services they provide – particularly during construction and development. • There is a need to protect designated geological sites.	• It is unclear if there will be sufficient previously developed land to sustain new development. This could lead to increased development pressure on greenfield sites.
Water	• Diffuse urban water pollution exists in local rivers and water bodies. • High number of properties at risk at flooding and there is a need to promote flood resistance and resilience measures for these properties. • Increasing population will put strain on water resources. • Potential impacts of the Local Plan policies and site allocations on groundwater need to be identified and addressed. • New development will need to incorporate SUDS to sustainably reduce flood risk. • Need to promote the use of new technologies and innovation in flood mitigation measures.	• Increases in population will drive further water demand in the Borough, thus increasing pressure on water resources. • Loss of green space could decrease water infiltration, increase surface runoff, therefore increasing flood risk.
Biodiversity	• Large areas of the SSSI sites are considered to be in either unfavourable with no change or an unfavourable and declining condition. • Increases in population will cause a demand for more development, where there is a potential for loss of valuable habitats which have yet to be designated for nature conservation as a direct result. • SSSIs and European sites within the Borough are under threat from poor air quality, recreational pressure and urban effects (including issues with litter). • Support is needed to achieve local BAP targets. • Promote effective land-management to support, protect and enhance biodiversity. • Consider and plan for the impacts of climate change on species and habitats.	• The condition of SSSIs may continue to decline.

Theme	Sustainability Issues	Likely Evolution Without the Local Plan
	• Encourage people to engage with the ownership, design, management, maintenance and use of their environment as part of their own vision for their neighbourhood. • Protect and enhance the wildlife and habitats in Waltham Forest, in particular those of international, national and regional importance. • Need to recognise the wider benefits of ecosystem services; minimise impacts on biodiversity and provide net gains in biodiversity where possible. • Work to conserve and enhance the local environment.	
Landscape	• Large areas of open space are Metropolitan Green Belt. There is a need to protect these areas of open space from development pressure. • Need to work to conserve and enhance the local environment. • Need to establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit. • Need to work towards conserving local character and history, by reflecting the identity of local surroundings and materials. This should not prevent or discourage appropriate innovation.	• Development pressure could lead to the loss of amenity land or open space.
Waste	• The amount of waste produced is reducing but still exceeds both the London and national average. • The London Plan encourages greater self-sufficiency for waste management in London and sustainable transportation of waste. • Recycling is increasing but continues to fall short of government targets. • Need to minimise the impact of municipal waste management on the Borough's environment. • Need to reduce the carbon footprint of municipal waste. • Need to ensure that all waste is managed in the most environmentally friendly way.	• Generation of waste is slowly expected to decrease.

clearlead

2 How the Plan and its Alternatives Were Assessed

The sustainability issues and the environmental protection objectives of other plans, programmes and policies which are relevant to LP1 have been reviewed and these, along with the sustainability issues and problems identified through the baseline review have been used to develop a framework of sustainability objectives. The SA Framework is presented in Table NTS4. The SA Framework has been used to assess the sustainability of LP1.

Table NTS4: SA Framework

SA Objective	Description
SA1	Meet local housing needs through the provision of a range of tenures and sizes of new dwellings
SA2	Reduce crime and the fear of crime
SA3	Improve standard of health and wellbeing of those who live and work in the Borough
SA4	Improve community cohesion and reduce inequalities through the provision of community facilities to meet local cultural, educational, recreational and social needs
SA5	Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system, reducing car use for all journey lengths
SA6	Prevent production of waste, improve resource efficiency and increase recycling and recovery
SA7	Reduce greenhouse gas emissions and promote low carbon growth
SA8	Conserve energy
SA9	Improve air quality
SA10	Improve water quality in rivers and groundwater and ensure the efficient use of water resources
SA11	Reduce the risk of flooding and improve resilience to climate change
SA12	Ensure the efficient use of land and buildings and protect soil quality and geological resources
SA13	Conserve and enhance biodiversity and the natural environment, improving resilience to climate change
SA14	Protect the ecological integrity of SSSI and Natura 2000 sites
SA15	Maintain and enhance the quality of the green belt and open space areas
SA16	Maintain and improve local distinctiveness
SA17	Conserve and enhance the historic built environment
SA18	Maintain and enhance the vitality and viability of the Borough's town centres
SA19	Improve the local economy by enabling employment developments in appropriate places
SA20	Maintain stable levels of employment in the Borough

3 Assessment of Alternatives and the Reasons for Choosing the Plan

3.1 Introduction

This section summarises the findings of the SA work which has helped inform and test the strategic options and spatial strategy options considered in the development of the LP1 policies. Appendices D and E to the full SA Report provide a detailed summary of the output of this work, which is described below.

3.2 Appraisal of the Local Plan Strategic Options

London Borough of Waltham Forest Council consulted on a new Local Plan 'Direction of Travel' document in November – December 2017. The Direction of Travel document was the first stage in the engagement process with residents, businesses and other stakeholders on what the new Local Plan should contain. It presented the challenges and opportunities for the Borough and a Vision for Waltham Forest, looking ahead to what the Borough will be like in 15 to 20 years' time.

The Direction of Travel document presented options for consultation, comprising six spatial strategy options (strategic growth options) for development in the Borough and a number of policy direction options (see Table NTS5), which were considered under the following ten topics. These options were subject to SA and an HRA screening exercise.

Table NTS5: Directions of Travel Options Appraised

Direction of Travel Options Assessed	
Strategic growth options: • Option 1: Developer Led; • Option 2: Key Growth Areas; • Option 3: Growth Hubs; • Option 4: Town Centres; • Option 5: Combined Approach; and • Option 6: Exceptional Circumstances.	Policy topics: • Decent Homes for Everyone; • Building a Resilient Economy; • Providing Physical Infrastructure; • Meeting Social and Community Infrastructure Needs; • Distinctive Town Centres and High; • Growing Our Culture and Visitor Attractions; • Creating High Quality Places; • Enhancing and Preserving our Heritage; • Protecting and Enhancing our Environment; and • Ensuring Climate Change Resilience.

The potential significant sustainability effects of each option appraised are presented in Tables 9 and 10 within the full SA Report. Full details on the assessment are contained in

Appendix E to the SA Report and the full report is available here
https://walthamforest.gov.uk/content/evidence-base-development-plan-documents

3.3 Appraisal of the Local Plan Spatial Strategy Options

A Growth Capacity Study was completed in June 2018 on behalf of London Borough of Waltham Forest Council[2] which identified a range of potential development sites and their capacities for development across the Borough. This work has been used to identify a collection of 'growth clusters' across the Borough, forming a New Spatial Strategy based on the 'Combined Approach' option (Option 5) (referred to in Table NTS5), in order to meet challenging new housing need/targets.

This New Spatial Strategy was tested through the SA together with a further reasonable alternative option of continuing with the existing spatial strategy as set out in the adopted Core Strategy. The summary of findings for the New Spatial Strategy and the Existing Spatial Strategy are shown in Figures 1 and 2 below. Section 6.3 of the full SA Report summarised the findings of the assessments of the two spatial strategy options in greater detail.

New Spatial Strategy

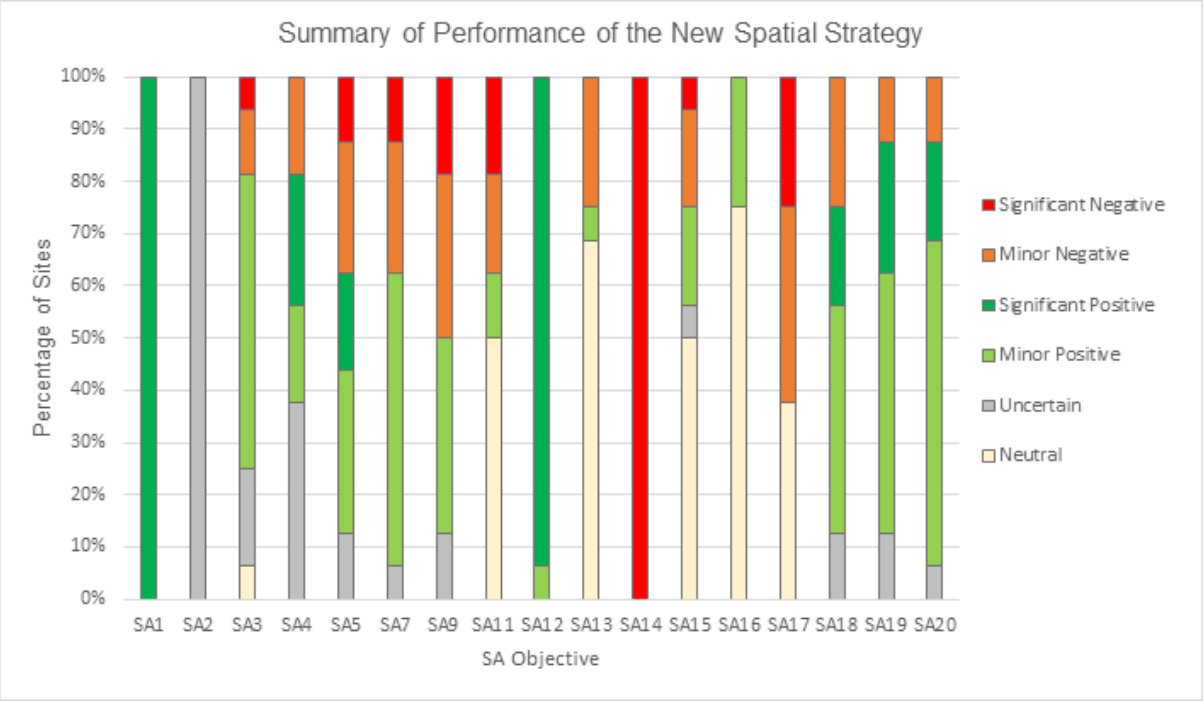


Figure 2: Summary of the Performance of the New Spatial Strategy

[2] Troy Planning & Design (June 2018) London Borough of Waltham Forest Growth Capacity Study

Existing Spatial Strategy

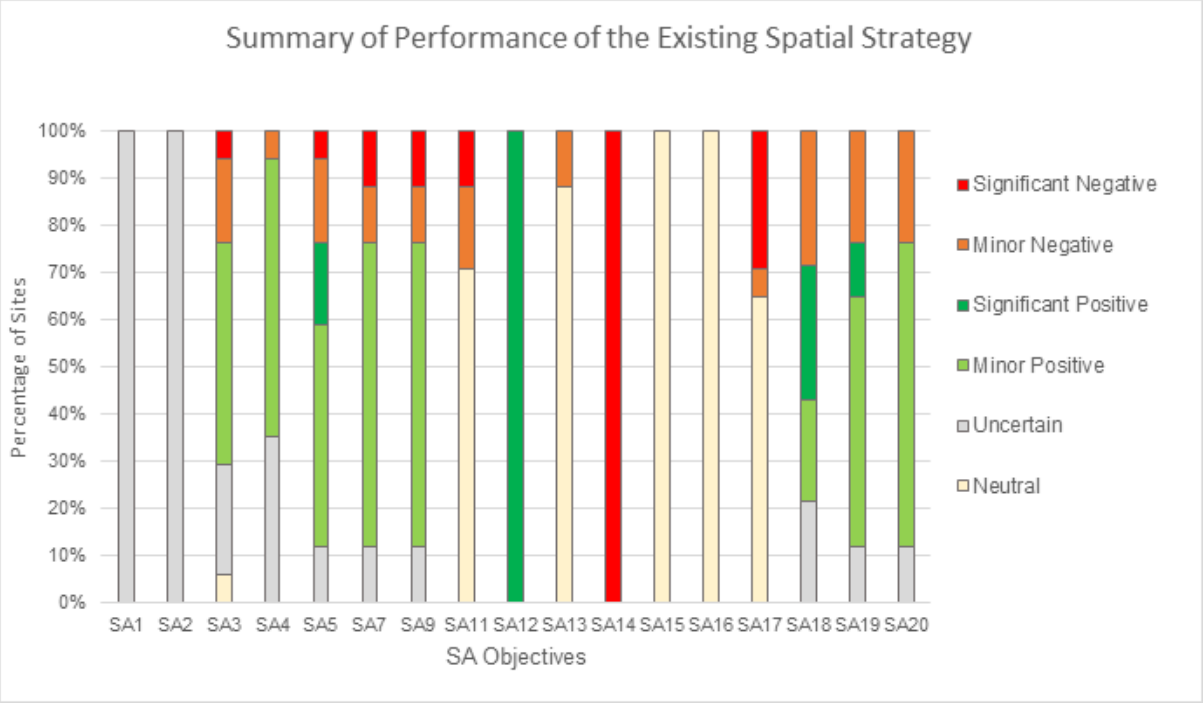


Figure 3: Summary of the Performance of the Existing Spatial Strategy

4 Sustainability Assessment of the Local Plan

4.1 Policy Assessment

The LP1 policies have been assessed for their sustainability effects. The potential effects identified can be seen in *Table NTS7* and a key defining the effects is presented in *Table NTS6*.

Table NTS6: Significance definitions for SA

Symbol	Definitions of Significance of Effects Against the SA Objectives	Assumptions on the nature of effects
++	**Significant Positive Effec**t: the policy supports the achievement of this objective; it addresses all relevant sub-objectives and could result in a potentially significant beneficial effect e.g. improved access by walking and cycling modes to a local or town centre	Permanent Continual Magnitude: High 80%+ receptor or environmental capacity affected; or Medium 40-80% of receptor or environmental capacity of affected The effect could be to: • enhance and redefine the location in a positive manner, making a contribution at a national or international scale; • enhance and redefine the location in a positive manner; • repair or restore receptors badly damaged or degraded through previous uses; and/or • improve one or more key elements/features/ characteristics of a receptor with recognised quality such as a specific regional or national designation.
+	**Minor Positive Effect:** the policy supports the achievement of this objective; it addresses some relevant sub-objectives, although it may have only a minor beneficial effect	Reversible Infrequent or intermittent Magnitude: Low 20-40% of receptor or capacity affected. The size, nature and location of a proposed scheme would: • improve undesignated yet recognised receptor qualities at the neighbourhood scale; • fit into or with the existing location and existing receptor qualities; and/or

Symbol	Definitions of Significance of Effects Against the SA Objectives	Assumptions on the nature of effects
		• enable the restoration of valued characteristic features partially lost through other land uses.
0	**Neutral Effect:** the policy has no impact or effect and is neutral insofar as the benefits and drawbacks appear equal and neither is considered significant	N/A
?	**Uncertain Effect:** Uncertain or insufficient information on which to determine the assessment at this stage	N/A

The plan has generally performed very positively, and the assessment has identified that the LP1 is likely to result in 178 significant positive effects across 73 policies.

A total of 9 uncertain effects were predicted for all policies. No potential significant negative effects were identified.

Further details of all potential significant and uncertain effects can be found within the main SA Report, and details on all potential effects can be seen within Appendix C to the SA Report.

clearlead

Table NTS7: Summary of potential effects of the LP1 policies

Policy Number	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16	SA17	SA18	SA19	SA20
Policy 1	0	0	+	+	0	0	+	+	0	0	+	0	0	0	+	0	0	+	+	0
Policy 2	+ +	0	0	0	0	-	0	0	0	0	0	0	0	0	0	0	0	+ +	+	+
Policy 3	+	0	+	+	+ +	0	0	0	0	0	0	0	0	0	0	0	0	+	+	+
Policy 4	+ +	0	+	+	0	0	0	0	0	0	0	+ +	0	0	+	0	0	+	+	+ +
Policy 5	0	0	+	+	0	0	0	0	0	0	0	+ +	0	0	+	0	+ +	+	+	+ +
Policy 6	+ +	+ +	+ +	+	0	0	+ +	+ +	0	0	+	+ +	+	0	+ +	0	+ +	+	+	+ +
Policy 7	+	0	0	0	+	0	0	0	0	0	0	+	0	0	0	+ +	+	+	+ +	+
Policy 8	+	0	0	0	0	0	0	0	0	0	0	+ +	0	0	0	+ +	+	+	+ +	+
Policy 9	+ +	+ +	+	+	+	+	+	0	+	0	0	0	0	0	0	-	+	0	+ +	+
Policy 10	+ +	+	+	+	+ +	0	+	0	+	0	0	0	0	0	0	+	+	+ +	+	+ +
Policy 11	+ +	+	+	+	+	0	+	0	+	0	?	0	0	0	+ +	0	0	+ +	+ +	+ +
Policy 12	+ +	0	0	0	0	0	0	0	0	0	?	+ +	0	0	0	0	0	+ +	0	0
Policy 13	+ +	0	0	+	0	0	0	0	0	0	0	+	0	0	0	0	0	+ +	0	0
Policy 14	+ +	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	+ +	0	0
Policy 15	+ +	0	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Policy 16	+	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+
Policy 17	+ +	0	0	0	0	0	0	0	0	0	0	+ +	0	0	0	0	0	0	0	0
Policy 18	+ +	0	0	+	+	0	0	0	0	0	0	?	0	0	0	0	0	0	0	0
Policy 19	+ +	0	+	+	+	0	+	0	+	0	0	?	0	0	?	0	0	+ +	0	0
Policy 20	+	0	+	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Policy 21	+ +	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Policy 22	+ +	0	+ +	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Policy 23	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Policy 24	+ +	0	0	+	0	0	0	0	0	0	0	+	0	0	0	0	0	0	0	0
Policy 25	0	0	0	0	0	0	0	0	0	0	0	+	0	0	0	0	0	+ +	+ +	+ +
Policy 26	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0	+	0	+ +	+ +	+ +

clearlead

Policy Number	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16	SA17	SA18	SA19	SA20
Policy 27	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0	+	0	+ +	+ +	+ +
Policy 28	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	+ +	+ +	+ +
Policy 29	+	0	0	+	0	0	0	0	0	0	0	+	0	0	0	+	0	+ +	+ +	+ +
Policy 30	0	0	0	0	0	0	0	0	0	0	0	+	0	0	0	+	0	0	+ +	+ +
Policy 31	+	+	0	0	0	+	0	0	+	0	0	0	0	0	0	+	0	0	+ +	+
Policy 32	0	0	0	0	0	0	0	0	0	0	0	+	0	0	0	0	0	+ +	+ +	+ +
Policy 33	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	?	?
Policy 34	0	0	+	+ +	+	0	0	0	+	0	0	0	0	0	0	0	0	+ +	+ +	+ +
Policy 35	0	0	0	0	0	0	0	0	0	0	0	+	0	0	0	+ +	+	+	+ +	+
Policy 36	0	0	0	+ +	+	0	0	0	0	0	0	+	0	0	0	0	0	+ +	0	0
Policy 37	0	0	+	+	0	0	0	0	0	0	0	-	0	0	0	+	+ +	+	0	0
Policy 38	0	+	0	+	0	0	0	0	0	0	0	+	0	0	0	+ +	0	+ +	+ +	+
Policy 39	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	+ +	+	+ +
Policy 40	0	0	+	+ +	+	0	0	0	0	0	0	0	0	0	0	0	0	+ +	+	+
Policy 41	0	0	0	+ +	0	0	0	0	0	0	0	+ +	0	0	0	+	0	+ +	+	+
Policy 42	0	0	0	0	0	0	0	0	0	0	0	+	0	0	0	0	0	+	+	+
Policy 43	0	0	0	0	0	0	0	0	0	0	0	+	0	0	0	0	0	+	+	+
Policy 44	0	0	0	0	0	0	0	0	0	0	0	+	0	0	0	0	0	+	+	+
Policy 45	+	0	+	+	+	0	0	0	0	0	0	+	0	0	0	+	0	0	+	-
Policy 46	0	0	0	+ +	0	0	0	0	0	0	0	+ +	0	0	0	+	0	+ +	+	+
Policy 46	0	+	0	+	+	+	0	0	0	0	0	0	0	0	0	0	0	+	+	+
Policy 47	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	+	0	0
Policy 48	0	0	+ +	+ +	+ +	0	+	0	+	0	0	0	0	0	0	+	0	+	0	0
Policy 49	0	0	0	+	+	0	0	0	0	0	0	+	0	0	0	0	0	0	0	0
Policy 50	0	+ +	+ +	+	+	0	+	0	+	0	0	0	+	0	+	+ +	0	0	0	0
Policy 51	+	0	+ +	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Policy 52	0	+ +	0	+ +	0	0	0	0	0	0	0	+	0	0	0	+	0	0	0	0
Policy 53	0	+	+	0	0	0	0	0	0	0	0	0	+	0	0	0	0	0	0	0

clearlead

Policy Number	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16	SA17	SA18	SA19	SA20
Policy 54	0	+ +	+ +	0	0	-	0	0	0	0	0	0	0	0	0	0	0	+	0	0
Policy 55	0	+	+ +	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0
Policy 56	+	+ +	+	+	0	+	+	+ +	+	-	+	+	+ +	0	+	+ +	+	+	0	0
Policy 57	+ +	+	+	+ +	+ +	0	+	+	+	0	+	+ +	+	0	+	+ +	+	+ +	+ +	0
Policy 58	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Policy 59	0	+	+	0	0	+	0	0	+	0	0	0	0	0	0	+	0	0	0	0
Policy 60	0	+ +	0	+ +	0	0	0	0	0	0	0	+	0	0	0	+	0	0	0	0
Policy 61	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	+	0
Policy 62	0	+	+ +	+	+ +	0	+	0	+ +	0	0	0	0	0	+	+ +	0	0	0	0
Policy 63	0	+	+ +	+ +	+ +	0	+	0	+	0	0	0	+	0	0	+	0	+	0	0
Policy 64	0	0	+	+	+ +	0	+	0	+	0	0	0	+	0	0	0	0	+ +	0	+ +
Policy 65	0	0	0	0	+ +	0	0	0	+ +	0	0	0	+	+	0	0	0	+	0	0
Policy 66	0	0	+	0	0	+	+	0	+ +	0	0	0	+	0	0	0	0	0	0	0
Policy 67	0	0	+	0	0	0	+	0	+	0	0	0	0	0	0	0	0	0	0	0
Policy 68	0	0	+ +	+	+	0	+ +	0	+ +	0	0	0	0	0	0	0	0	0	0	0
Policy 69	0	0	+	0	+	0	+ +	0	+ +	0	0	0	0	0	0	0	0	0	0	0
Policy 70	+	0	0	+	0	0	+	+	0	0	0	0	0	0	0	0	0	+	0	0
Policy 71	+	0	+	+	+	0	+	+	+	0	0	0	0	0	0	0	0	+	0	+ +
Policy 72	-	0	+	+	0	0	0	0	0	0	0	+	0	0	0	+	?	+ +	+	0
Policy 73	-	0	+	+	0	0	0	0	0	0	0	+	0	0	0	+ +	+ +	+	0	+
Policy 74	-	0	+	+	0	0	0	0	0	0	0	+	0	0	0	+ +	+ +	+	0	0
Policy 75	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-	-	0	0	0
Policy 76	-	0	+	0	0	0	0	0	0	0	0	+	0	0	+	+ +	+ +	0	0	0
Policy 77	0	0	+	0	0	0	0	0	0	0	0	+	0	0	+ +	+ +	+ +	0	0	0
Policy 78	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	+ +	0	0	0
Policy 79	0	0	+	+	+	0	+	0	+	0	0	+	+	0	?	+	0	0	0	0
Policy 80	0	0	+	+	0	0	0	0	0	0	0	0	+	0	+ +	+	0	0	0	0
Policy 81	0	0	+	0	0	0	0	0	0	0	0	+	+	+ +	0	+ +	0	0	0	0

Policy Number	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16	SA17	SA18	SA19	SA20
Policy 82	0	0	+	+	0	0	0	0	0	0	0	0	+	0	0	+ +	+	0	0	0
Policy 83	0	0	+	0	0	0	0	0	0	0	0	0	+ +	+ +	+ +	+ +	0	0	0	0
Policy 84	0	0	+	0	+	0	0	0	0	0	0	0	+ +	+ +	+ +	+ +	0	0	0	0
Policy 85	0	0	0	0	0	0	0	0	0	+	+	0	+	0	0	0	0	0	0	0
Policy 86	0	0	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Policy 87	0	0	+ +	0	0	+	+ +	+ +	+	0	+ +	0	0	0	0	0	0	0	0	0
Policy 88	0	0	0	0	0	0	+ +	+ +	+	0	+	0	0	0	0	0	0	0	0	0
Policy 89	0	0	+	0	0	+ +	+ +	+ +	+	0	+	0	+	0	0	0	0	0	0	0
Policy 90	0	0	+	0	0	0	+	+	+	0	+	0	0	0	0	0	0	0	0	0
Policy 91	0	0	0	0	0	0	0	+	0	+ +	+	0	0	0	0	0	0	0	0	0
Policy 92	0	0	0	0	0	0	0	0	0	0	0	+	0	0	0	0	0	0	0	0
Policy 93	0	0	0	0	0	0	0	0	0	+	+ +	0	0	0	0	0	0	0	0	0
Policy 94	0	0	+	0	0	0	+	+ +	+	0	+	0	+	0	0	0	0	0	0	0
Policy 95	0	0	0	0	0	+ +	0	+	0	0	0	0	0	0	0	0	0	0	0	0
Policy 96	0	0	+	+	+	0	0	0	+	0	0	0	+	0	+	0	0	+	0	0
Policy 97	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+ +	+ +	+ +

4.3 Potential Cumulative effects

The potential cumulative effects of the spatial realisation of the LP1 have been identified within the SA of LP2. Being a strategic plan, the potential cumulative effects which the LP1 could result in relate to effects with other plans and projects, and in particular, growth planned in neighbouring areas. Potential cumulative effects are discussed within Table NTS8 as follows:

Table NTS8: Potential Cumulative Effects

Local Authority	Proposed Growth	Potential Effect
London Borough of Enfield	A new Local Plan is being prepared and reviewed in response to consultation comments received between December 2018 and February 2019. It is predicted that Enfield's population could exceed 400,000 by 2032.	Potential cumulative (or in combination) effects with growth in neighbouring areas have been assessed as part of the HRA of LP1. Mitigation measures have been identified in order to address potential effects in relation to air quality and recreational pressure. With the mitigation in place, no potential cumulative effects are identified.
Haringey	Haringey's development plan is currently made up of the Strategic Policies, Development Management Policies, Site Allocations and Tottenham Area Action Plan, alongside the London Plan. Strategic Policies were adopted by the Council in 2013, to replace the Unitary Development Plan (UDP), with subsequent alterations adopted on the 24 July 2017[3]. The plan aims to deliver a minimum 19,800 net new homes over the plan period to 2026.	Potential cumulative (or in combination) effects with growth in neighbouring areas have been assessed as part of the HRA of LP1. Mitigation measures have been identified in order to address potential effects in relation to air quality and recreational pressure. With the mitigation in place, no potential cumulative effects are identified.
London Borough of Hackney	On 22 July 2020, the Hackney Local Plan 2033 was adopted. The Local Plan includes an objective to deliver up to 26,250 additional homes and 23,000 new jobs.	Potential cumulative (or in combination) effects with growth in neighbouring areas have been assessed as part of the HRA of LP1. Mitigation measures have been identified in order to address potential effects in relation to air quality and recreational pressure. With the mitigation in place, no potential cumulative effects are identified.
London Borough of Redbridge	The Redbridge Local Plan was adopted in March 2018. It aims to deliver up to 17,237 new homes across the Borough	Potential cumulative (or in combination) effects with growth in neighbouring areas have been assessed as part of the HRA of LP1. Mitigation measures have been identified in order to address potential

[3] Haringey's Local Plan 2013 – 2026 (formerly the Core Strategy) March 2013 consolidated with alterations since 2017

Local Authority	Proposed Growth	Potential Effect
		effects in relation to air quality and recreational pressure. With the mitigation in place, no potential cumulative effects are identified.
Epping Forest District	An updated Local Plan has been prepared for the period 2011-2033 (Submission version dated December 2017) which made provision for a minimum of 11,400. Following examination, the Inspectors report (dated 2nd August 2019) concluded that the Local Plan is not currently sound and requires further major modifications before it can be accepted.	Potential cumulative (or in combination) effects with growth in neighbouring areas have been assessed as part of the HRA of LP1. Mitigation measures have been identified in order to address potential effects in relation to air quality and recreational pressure. With the mitigation in place, no potential cumulative effects are identified.
The London Plan, 2021	The London Plan recognises the deprivation within Waltham Forest, and clearly sets out strategy to deal with this. For example, the London Legacy Development Corporation (LLDC), which involves several local authorities having a coordinated response to issues in the area surrounding the Queen Elizabeth Olympic Park.	There is potential for a cumulative positive effect to result from the implementation of the Waltham Forest LP1 working in combination with the London Plan in relation to SA1 (housing), SA3 (health), SA19 (local economy) and SA20 (employment).

In addition, projects which could have a cumulative effect have been considered and a number of potential positive cumulative effects with the LP1 have been identified. These potential positive cumulative effects relate to access, employment opportunities, water and air quality and biodiversity. Climate change resilience may also be improved. The projects considered are Crossrail 1 and Crossrail 2, Deephams Sewage Works, Edmonton and North London Heat and Power Project.

4.4 Mitigation

The SA Report has recommended mitigation measures to address potential significant negative effects and uncertainties identified and this mitigation is presented in Table NTS9.

Table NTS9: Proposed Mitigation Measures

Theme	Policy	Explanation and Mitigation Measures to Minimise or Avoid Effects
North Waltham Forest	11	SA11: FRA is required to demonstrate that 800 homes can be delivered within the North Circular Corridor strategic location without increasing flood risk.
Decent homes for everyone	12	SA11: FRA is required to demonstrate that 27,000 homes can be delivered by 2035 within the plan area without increasing flood risk.
	18	SA12: To enhance the sustainability performance of the policy, the policy wording could make it clear that the development of brownfield land is favoured over greenfield land.
	19	SA12 and SA15: To enhance this policy in relation to SA12 it is recommended that the policy specifies that infill development applies to brownfield land rather than greenfield land. Similarly, the policy should make reference to greenbelt land and open spaces to support SA15, thus mitigating any potential negative effects. Policies 84: Green Infrastructure and the Natural Environment, Policy 85: Open Spaces, Sport and Recreation and policy 86: Biodiversity and Geodiversity should also help to prevent the development of key greenfield sites.
Building a Resilient and Creative Economy	33	SA19 and SA20: the provision of a percentage of affordable workspace to be included in the policy would remove the uncertainty identified in the assessment.
Enhancing and Preserving our Heritage	72	SA17: No mitigation has been identified for the uncertain effect on heritage assets resulting from these policies. As the policy allows for some development of such assets within the Borough to occur, it is not fully understood how the heritage of Waltham Forest as a whole may be affected.
Protecting and Enhancing the Environment	79	SA15: There is potential for a significant negative effect on SA15 to arise due to a lack of clear criteria setting out which circumstances development could be permitted under; this could result in the permanent loss of greenfield and Green Belt land, which could not be mitigated. Currently, the London Plan, which this policy appears to rely on for deciding development, will allow it if the development fits the Local Plan policies. This could lead to confusion as well as the development of areas which are not best suited, or which could be irreversibly changed. Clearly stating the other policies to which this policy refers would add clarity to the policy and could prevent the permanent loss of greenfield and Green Belt land.

5 Monitoring

The SEA Regulations require monitoring of the significant environmental effects of implementing the Waltham Forest Local Plan. Monitoring should cover the significant economic and social effects, as well as the environmental ones. This should allow the early identification of unforeseen adverse effects so that appropriate remedial action can be taken.

The requirements of the SEA Regulations focus on monitoring the significant negative and unforeseen effects of the plan. Therefore, monitoring will focus on the residual effects which are significantly negative or uncertain, as presented within Section 4.

The Local Plan includes a Monitoring Strategy which will be reported on through the Authority Monitoring Report (AMR). The outcome of the monitoring process will inform whether or not the Local Plan should be reviewed. At this stage, two primary areas of risk have been identified:

- Insufficient sites coming forward for housing and/or employment development due to difficulties in land assembly and development viability, the consequence of which being that housing and employment delivery fall behind the projected trajectory and the Borough fails or is likely to fail to meets its Objectively Assessed Needs for housing and employment.
- Infrastructure delivery, either in the form of on-site delivery or financial contributions to support off-site, is insufficient to deliver the provision of critical infrastructure, without which, development cannot proceed.

Appendix 5 of the LP1 'Monitoring Indicators and Targets' sets out the performance indicators and targets by which the progress of the plan will be monitored. All of the Local Plan Indicators set out within Appendix 5 of the LP1 will provide information in relation to the potential sustainability effects of the plan including housing, employment development and jobs delivery and maintaining greenbelt. Via planning conditions, the London Borough of Waltham Forest will also be ensuring that development proposals demonstrate biodiversity net gain using the Natural England Biodiversity metric (or agreed equivalent), and for developments of 10 units and above, developers will be encouraged to exceed the Urban Greening Factor targets scores set out in Policy G6 of the London Plan. Biodiversity improvements will therefore be monitored in this way.

Enhancement of open space will be monitored through the delivery of the emerging 'Mitigating the Impact of Development on SAC SPD' and air quality within the Borough is monitored on an ongoing basis.

In monitoring outcomes, a proactive approach will be used by the Council. Where necessary, new indicators will be created and obsolete indicators will be deleted or amended to meet changing circumstances in the way data is collated.

Some of the indicators that have been included in the Local Plan monitoring will be influenced by many factors and not just the Local Plan, but they still provide a useful way of monitoring the overall outcomes that the document is seeking to help the Borough achieve.

The 'Monitoring Indicators and Targets' set out within the LP1 Appendix 5 will be checked following the Local Plan Examination in order to ensure that the indicators address all of the predicted residual effects identified in the SA. If they don't, new indicators will be identified. The monitoring indicators will be presented within the SA adoption statement.

6 Next Steps

The LP1 is being submitted to the Secretary of State for examination in public. The date of examination will be established following submission. Modifications to the LP1 may be put forward by the Inspector following the examination and if this is the case they will be screened to identify any modifications which are significant with regards to the SA. Such modifications may require assessment and an updated SA Report will be published if that is the case.

An SA adoption statement will be prepared for publication soon after the LP1 is adopted.

Table NTS10: Waltham Forest Local Plan Timetable

Local Plan Activity	Timeframe
Submission	30th April 2021
Examination	Q2 2021
Adoption	Q4 2021