



‘Shaping the Borough’ - Waltham Forest Local Plan (LP1) Examination

Response to the Inspectors’ Preliminary Matters

(5) Modifications

August 2021

- 1) In response Question 19 on the Inspectors Preliminary Questions dated 25th June 2021. For better clarification, the Council have removed reference to “major and minor” modifications in [KD2 Schedule of Proposed Changes to the Published Plan](#). The Council also notes that Inspectors’ intention to discuss these changes further as part of the Local Plan Examination process.

- 2) A revised document is provided below.

SHAPING THE BOROUGH

WALTHAM FOREST LOCAL PLAN 2020 – 2035 (LP1)

SUBMISSION

SCHEDULE OF PROPOSED CHANGES TO THE PUBLISHED PLAN





London Borough of Waltham Forest Local Plan LP1 “Shaping the Borough”

SCHEDULE OF PROPOSED CHANGES TO THE PUBLISHED PLAN (PROPOSED SUBMISSION DOCUMENT, REG

19)

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Text to DELETE: struck-through in red ~~text to insert~~

CHAPTER 1: INTRODUCTION AND BACKGROUND					
REF	POLICY	PARA	PAGE	PROPOSED CHANGE	REASON FOR PROPOSING CHANGE
SOPC001		1.10	2	The London Plan <u>2021</u> is the statutory Spatial Development Strategy for Greater London prepared by the Mayor of London (“the Mayor”) in accordance with the Greater London Authority Act 1999 (as amended) (“the GLA Act”) and associated regulations. The Mayor of London is preparing a new London Plan. The Plan is at an advanced stage, but has not been formally published. Following examination, the latest version of the London Plan (Intend to Publish) was published in December 2019.	Factual update to reflect current status of the London Plan.

CHAPTER 2: BOROUGH PORTRAIT

REF	POLICY	PARA	PAGE	PROPOSED CHANGE	REASON FOR PROPOSING CHANGE
				NO PROPOSED CHANGES	

CHAPTER 3: VISION AND STRATEGIC OBJECTIVES

REF	POLICY	PARA	PAGE	PROPOSED CHANGE	REASON FOR PROPOSING CHANGE
SOPC002			10	Vision Statement – Liveable Waltham Forest (2 nd sentence) “A new vision of urban living is in place where all residents are able to meet most of their needs within a 15 20 -minute walk or cycle from their homes.	Factual update to reflect the Council’s Corporate Strategy as published – Waltham Forest Public Strategy 2020.
SOPC003			13	Strategic Objective 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 20 -minute walk or cycle.	Factual update to reflect the Council’s Corporate Strategy as published – Waltham Forest Public Strategy 2020.
SOPC004			13	Add new Strategic Objective: <u>To preserve and enhance the Historic built environment for future generations to enjoy the borough’s distinctive character and heritage.</u>	To add an objective to protect the Borough’s historic Environment.

CHAPTER 4: WALTHAM FOREST’S SPATIAL AND GROWTH STRATEGY

REF	POLICY	PARA	PAGE	PROPOSED CHANGE	REASON FOR PROPOSING CHANGE
SOPC005	3	4.12	19	New text inserted after 2 nd sentence of paragraph to read as follows: <u>With regards to public transport infrastructure provision, it will be important to ensure the integration of new development with future requirements for bus infrastructure and services. This</u>	For better clarity and interpretation of the Plan.

				will include demand management measures as well as safeguarding existing bus infrastructure.	
SOPC006	4	4.25	22	New text inserted after 2 nd sentence of paragraph to read as follows: In this Plan, the sites shown in Figure 4.1 are not site allocations. Pending further work and decisions to be undertaken on site selection, this information is included only as a guide. The Council intends to monitor and update this information through the Authority Monitoring Report with sources of information from 'Call for Sites' exercises and future Strategic Housing Land Availability Assessments (SHLAA).	For better clarity and interpretation of the Plan.
SOPC007	5 (C)		22	Amendment where indicated to read as follows: Protecting designated sites, areas and green space (Green Belt, Metropolitan Open Land, Special Protection Areas, Special Areas of Conservation and Sites of Special Scientific Interest; including Epping Forest SAC and SSSI and Lea Lea Valley Regional Park SAC SPA and RAMSAR) and conserving biodiversity including wildlife. (Chapter 17 - Protecting and Enhancing the Environment);	Correction of factual error.
SOPC008	5(F)		22	Insert new opening sentence as follows: Promoting good design and high quality place making (Chapter 14 – Creating High Quality Places) , by ensuring that development is planned and implemented in a coordinated way, guided by Supplementary Planning Documents (SPD), Masterplans and Planning Briefs where appropriate. Pending the preparation and adoption of Masterplan SPDs for the identified strategic locations, proposals for major development coming forward will be considered on the basis of good growth principles and policies included in this plan and the London Plan;	For better clarity and interpretation of the Plan.
SOPC009	6 (B)		26	New text inserted as highlighted. Contribute to improving and enabling healthier lifestyles (Chapter 13 'Promoting Health and Well-being'); Policy 63 - Active Travel ;	For better interpretation of the policy.

SOPC010	6(E)		26	<p>New text as highlighted:</p> <p>Support the creation of successful neighbourhood communities (15 minute neighbourhoods, <u>where every resident is able to meet most or all of their needs within a short walk or bike ride from home</u>), the provision of adequate social and physical infrastructure (Chapter 12 'Social and Community Infrastructure') <u>Policy 63 - Active Travel; Policy 64 - Public Transport;</u></p>	To reflect the Council's Corporate Strategy - Waltham Forest Public Service Strategy, 2020.
SOPC011	6 (H)			<p>New text as highlighted:</p> <p>Contribute to the response to climate change, through mitigation and adaptation, the use of sustainable building materials, low carbon heating and energy efficiency, <u>low carbon transport, electrical vehicles and active travel</u> (Chapter 18 'Addressing the Climate Emergency'); <u>(Chapter 15 Active Travel, Transport & Digital Infrastructure);</u></p>	For better interpretation of the policy

CHAPTER 5: SOUTH WALTHAM FOREST

REF	POLICY	PARA	PAGE	PROPOSED CHANGE	REASON FOR PROPOSING CHANGE
SOPC012		VISION	33	Update number of new homes in vision to 14,900 - <u>16,100</u>	To match Policy 9: South Waltham Forest
SOPC013		VISION	33	Whipps Cross will be an important community hub, centring on an improved and upgraded state-of-the-art hospital, supporting community and health services and new <u>high</u> quality homes.	To align with representation from Barts Health Trust.
SOPC014		VISION	33	'A new station at Ruckholt Road will further improve the connectivity of Leyton – <u>further</u> opening opportunities for an urban extension at Leyton Mills and New Spitalfields. Coronation Square neighbourhood will have been delivered and will become a desirable and liveable part of the borough.'	To safeguard development in the Ruckholt Road area even if Ruckholt Road Station is not deliverable.
SOPC015	9		35	B. Contribute to the delivery of a minimum of 16,000 - <u>16,100</u> new quality homes across the South Area:	Rounding error.

SOPC016	9		35	Amend Point D to read: D. Supports the delivery of the Leyton Mills and New Spitalfields-New Leyton Site Opportunity Locations in the Leyton Strategic Location, including new development around the potential Ruckholt Road Station in accordance with the Strategic Site Allocations DPD; and/ or as part of masterplan proposals);	To align with officially confirmed area name for the area by removing references to “New Leyton”.
SOPC017	9		36	Amend Point L: Protect and Enhance the Bakers Arms, Browning Road, Forest School , Leyton Town Centre and Leytonstone Bushwood Conservation Areas (see Policy 74 Conservation Areas)	To correct error. The area is designated as the Browning Road Conservation Area
SOPC018				Insert new para as follows: <u>N: Create opportunities to improve and grow the visitor, sporting and wider cultural offer of the Lee Valley Regional Park and its venues; including the Lee Valley Ice Centre, the Lee Valley WaterWorks Centre and the Lee Valley Hockey and Tennis Centre, thereby ensuring their long-term sustainability and contribution to the visitor economy of the borough.</u>	To take into account consultation response of LVRPA
SOPC019		5.10	36	To amend para 5.10 to read: 5.10 The South also plays an important economic role within the borough and the Employment Land Study (2019) has identified the potential to deliver of 3,250 new jobs over the plan period (see Policy 25 - Supporting and boosting economic growth and local job creation). There is an opportunity within Leyton to deliver significant sustainable development around Leyton Mills and New Spitalfields. The area is called New Leyton. To support this growth sustainability in the South and at New Leyton , the Council is considering how it can improve public transport accessibly in the area. The Council has found that there is a potential for a new station at Ruckholt Road and aspires to see this delivered to support new development in the area surrounding it.	To align with officially confirmed area name for the area by removing references to “New Leyton”.
SOPC020		5.15		<i>The South is home to important sporting and cultural venues. These include the Lee Valley Ice Centre, Lee Valley Riding Centre, and Lee Valley Waterworks Centre in Lea Bridge and</i>	To reference proposed additions by LVRPA at consultation.

Church Road Strategic Location; Leyton Orient, Ive Farm and the **Lee Valley Hockey and Tennis Centre** in Leyton and the Heart of Leyton (Leyton Cricket Hub) in Bakers Arms and Leyton Green. There are opportunities to add to these facilities, including supporting the night time economy (see Policy 46 - Evening and Night-time Economy Uses) and these will be supported in Strategic Locations and Town Centres (in accordance with Policy 39 - Hierarchy of Centres) and the boroughs cultural and sporting needs (see Policy 36 - Promoting Culture and Creativity).

CHAPTER 6: CENTRAL WALTHAM FOREST					
REF	POLICY	PARA	PAGE	PROPOSED CHANGE	REASON FOR PROPOSING CHANGE
SOPC021	10		43	Amend Clause F: Enable delivery of Waltham Forest Town Hall Campus , Fellowship Square as a new multi-purpose hub and liveable neighbourhood with supporting community, social infrastructure and retention of existing civic functions; while conserving and enhancing the significance of the listed buildings on the site	To recognise that the Town Hall Campus is now referred to as Fellowship Sq and to recognise the importance of the historic buildings on site.
SOPC022		6.8	40	The Blackhorse Lane area has been identified as a Creative Enterprise Zone in line with the London Plan policy; HC5. This designation builds on Blackhorse Lane's rich history of manufacturing items such as textiles, glass, paint, aircraft engines and shop mannequins. The area has excellent access to the Walthamstow Wetlands and the borough's cultural attractions. Blackhorse Road Station Transport Hub provides opportunities for improving sustainable transport, including walking and cycling accessibility. Development in the area should provide flexible and creative workspaces which provide attractive and affordable options for start-up and incubator businesses (where viable) alongside high quality, new homes . Within the Creative Enterprise Zone, the Council supports 'meanwhile' uses on a temporary basis for businesses to contribute to the variety and vibrancy of the area.	To recognise the residential offer in the Blackhorse Lane Strategic Location.

SOPC023		6.14	44	Due to the diverse nature of the Central Area, the Council is also committed to supporting growth outside Walthamstow Town Centre. Other parts of the Central Area where growth will be supported include Wood Street, Forest Road and Blackhorse Lane – all of which will complement Walthamstow Town Centre with their own distinct characters. As the Borough’s Creative Enterprise Zone, Blackhorse Lane (Central Waltham Forest Policy clause E) will provide space for the growing number of small, independent, creative sector businesses to locate and grow, whilst also bringing other new jobs, new high quality homes, shops and cafes and other infrastructure to form a creative living and working community, alongside the existing and regionally significant light industrial, manufacturing and production uses found here.	To improve the context of the vision.
SOPC024	10		43	Clause B, iii: iii. Encouraging proposals that seek to consolidate the role and function of Walthamstow Central transport hub as a key transport interchange in outer north London whilst supporting its potential for development and enhancement.	Acknowledgement for the potential to develop Walthamstow Central Transport Hub

CHAPTER 7: NORTH WALTHAM FOREST

REF	POLICY	PARA	PAGE	PROPOSED CHANGE	REASON FOR PROPOSING CHANGE
				NO PROPOSED CHANGES	

CHAPTER 8: DECENT HOMES FOR EVERYONE

REF	POLICY	PARA	PAGE	PROPOSED CHANGE	REASON FOR PROPOSING CHANGE										
SOPC025	12		54	<p>Policy 12 - Increasing Housing Supply</p> <p>Opportunities for housing growth in Waltham Forest will be maximised to deliver a minimum of 27,000 homes by 2035 by:</p> <p>A. Focusing delivery of new housing in Waltham Forest's Strategic Locations, Site Opportunity Locations, and accessible locations around transport hubs in accordance with Policy 4 - Location and Management of Growth;</p> <p>B. Adopting a stepped housing target, in line with Waltham Forest's Housing Trajectory;</p> <p>Table 8.1 here</p> <table border="1" data-bbox="562 858 1272 1015"> <thead> <tr> <th data-bbox="562 858 745 951">Financial Year</th> <th data-bbox="745 858 880 951">2019/20 - 2023/24</th> <th data-bbox="880 858 1010 951">2024/25</th> <th data-bbox="1010 858 1144 951">2025/26 - 2029/30</th> <th data-bbox="1144 858 1272 951">2030/31 - 2035/36</th> </tr> </thead> <tbody> <tr> <td data-bbox="562 951 745 1015">Annual Requirement</td> <td data-bbox="745 951 880 1015">1264</td> <td data-bbox="880 951 1010 1015">1770</td> <td data-bbox="1010 951 1144 1015">2276</td> <td data-bbox="1144 951 1272 1015">1770</td> </tr> </tbody> </table> <p>C. Adopting a strategic target for 50% of all new homes to be genuinely affordable across the plan period (See Policy 13 'Delivering Genuinely affordable housing');</p> <p>D. Maximizing opportunities to increase the supply of homes on all suitable, appropriate and available sites including developing brownfield land, surplus public sector land and encouraging residential intensification;</p>	Financial Year	2019/20 - 2023/24	2024/25	2025/26 - 2029/30	2030/31 - 2035/36	Annual Requirement	1264	1770	2276	1770	Inclusion of table in Policy (from supporting text)
Financial Year	2019/20 - 2023/24	2024/25	2025/26 - 2029/30	2030/31 - 2035/36											
Annual Requirement	1264	1770	2276	1770											

				<p>E. Making effective and efficient use of land by seeking to optimise housing densities;</p> <p>F. Ensuring new homes address different housing needs and provide a variety of housing choices;</p>	
SOPC026	13		56	<p>Policy 13 - Delivering Genuinely Affordable Housing The delivery of 50% of all new homes to be genuinely affordable housing will be achieved by:</p> <p>A. Requiring all development involving the addition of 10 or more units to deliver affordable housing;</p> <p>B. Working with the Mayor of London to use grant funding to increase affordable housing delivery beyond the level that would otherwise be provided;</p> <p>C. Adopting a threshold approach to viability. Where proposals meet the following criteria, they will not be required to provide a viability assessment at application stage:</p> <p>i. Meet or exceed the threshold level of affordable housing on site without public subsidy. These thresholds are initially set at:</p> <p>a. A minimum of 35%; or</p> <p>b. 50% for public sector land where there is no portfolio agreement with the Mayor; or</p> <p>c. 50% for Industrial Land (SIL, LSIS, BEA, and non-designated) where the scheme would result in a net loss of industrial capacity.</p> <p>ii. Be consistent with the Council's tenure split (see Policy 14 – Affordable Housing Tenure);</p> <p>iii. Demonstrate that they have sought grant to increase the level of affordable housing;</p> <p>iv. Are subject to a Section 106 agreement with Early Stage Viability Review, triggered if an agreed level of progress on implementation is not made within two years of the permission being granted (or an alternative period agreed by the Council);</p>	For better clarity and interpretation of the Plan – to address change in BEA status

D. Proposals which do not meet the criteria in Part C will be expected to follow the Viability Tested Route and submit detailed supporting viability evidence to determine the level of affordable housing required. Where required, viability assessments will be undertaken in line with the Mayor's Affordable Housing and Viability SPG. These schemes will be subject to:

i. Early Stage Viability Review if an agreed level of progress on implementation is not made within two years of the permission being granted;

ii. Mid Term Reviews prior to implementation of phases for larger phased schemes; and

iii. a Late Stage Viability Review which is triggered when 75 per cent of the units in a scheme are sold or let (or an alternative period agreed by the Council);

E. Delivering affordable housing on site, other than in exceptional circumstances where off-site or payment-in-lieu would secure better outcomes in meeting the borough's housing need; and

F. Seeking affordable housing contributions from alternative housing products (see Policy 18 'Other forms of housing'):

i. Build to rent: as Discount Market Rent (DMR) at genuinely affordable rent;

ii. Purpose-built student accommodation: the affordable student accommodation bedrooms should be allocated by the higher education provider(s) that operates the accommodation, or has the nomination right to it, to students it considers most in need of the accommodation;

iii. Large -scale purpose build shared living: payment-in-lieu contributions to conventional C3 affordable housing

SOPC027		8.15		8.15 Affordable housing contributions will be sought on alternative housing products such as Build to Rent, Purpose Built Shared Housing, Purpose Built Student Housing in line with the Intend to Publish London Plan.	Intend to Publish was superseded by Publication London Plan which has now been adopted and is 'The London Plan'.
SOPC028	19		64	Policy 19 - Small Sites Proposals for the development of small sites for new homes will be supported where they: A. Seek to infill, intensify and re-model areas of existing housing; B. Encourage innovative approaches to housing delivery; and C. Support residential intensification within 800 metres of a designated centre with good public transport accessibility.	For better clarity and interpretation of the Plan.
SOPC029		8.25	66	8.25 HMOs comprise of small shared dwelling houses or flats occupied by between 3 to 6 unrelated individuals who share basic facilities. HMOs can form an important part of the housing stock, if they are of high-quality design, provide good quality living standards and adequate space for people to live in. These developments are expected to be located near or in town centres, as well as near public transport. However, all too often this is not the case and the Council has enforced against many poor quality HMOs and will continue to do so.	For better clarity and interpretation of the Plan .
SOPC030		8.28	66	8.28 Downsizing homes are for those aged 55+ and will be focused in areas where there is identified need. It is expected that such units will be provided on all developments in these areas of over 1500 dwellings (gross). This policy seeks to encourage occupiers of large family-sized accommodation who are considering the need to downsize to a smaller property. This will help make better use of larger-sized stock, by making houses available to growing families and those who require it. It could also help older, often vulnerable residents to move to accommodation that is easier for them to manage. This policy acknowledges the challenges associated with buying and selling housing properties and encourages developers of new housing to consider opportunities to provide suitable units for those considering opportunities to downsize	Amended to be consistent with policy – encouraged on developments of over 100 units.

SOPC031	22	67	<p>Policy 22 - Supported and Specialist Accommodation</p> <p>Supported and specialist accommodation will be supported by:</p> <p>A. Encouraging the retention and refurbishment of supported and specialist accommodation where it meets identified need and is of appropriate design quality; and</p> <p>B. Requiring new supported and specialist developments to:</p> <ul style="list-style-type: none"> i. Be designed to meet to satisfy the requirement(s) of a specific use or group; ii. Meet the definition of supported housing and specialist accommodation (See Table 8.6 and Glossary); iii. Meet identified local and strategic housing needs; iv. be well connected to facilities, social infrastructure, health care; v. Be well served by public transport; <u>and</u> vi. <u>Be</u> Of high quality design, including accessibility. <p><u>C. Resisting the unjustified loss of specialised housing unless:</u></p> <ul style="list-style-type: none"> i. <u>It can be demonstrated that there is a surplus of that form of accommodation in the area and that it is no longer required; or,</u> ii. <u>The existing accommodation will be adequately re-provided to an equivalent or greater standard in the area; and,</u> iii. <u>It can be demonstrated that the existing accommodation is incapable of meeting contemporary standards of care.</u> 	For better clarity and interpretation of the Plan.
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SOPC032

8.30

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8.30 Supported and Specialist housing may be self-contained or non-self-contained and can include:

Supported and Specialised Accommodation	Definition
Sheltered Accommodation (also referred to as supported housing)	<ul style="list-style-type: none">• Self-contained accommodation for people who require no or a low level of support.• Schemes normally include additional communal facilities such as a residents' lounge and a scheme manager, warden or personal alarm/telecare system <p>• Use Class C3</p>
Extra care accommodation (also referred to as assisted living, close care, continuing care housing)	<ul style="list-style-type: none">• ... <p>• Use Class C3</p>
Residential nursing care accommodation (including end of life/hospice care, nursing care units and dementia care home accommodation)	<ul style="list-style-type: none">• ... <p>• Use Class C2</p>

Removal of use class reference.

SOPC033	23		69	<p>Policy 23 - Gypsies and Travellers</p> <p>Gypsies and Travellers' <u>identified</u> needs will be met by:</p> <p>A. Protecting the existing provision of pitches for Gypsies and Travellers at Folly Lane and Hale Brinks North;</p> <p>B. Supporting intensification of existing sites to provide extra pitches at Folly Lane and Hale Brinks North in line with the need set out in the Gypsies and Travellers Needs Assessment.</p>	
SOPC034		8.31	69	<p>8.31 There are two Gypsy and Traveller sites in the borough; one at Folly Lane and another at Hale Brinks North. A Gypsy and Travellers' Needs Assessment has been commissioned to understand the level of need in the Borough. The Gypsy and Travellers' Needs Assessment has identified a requirement for two <u>additional</u> pitches under the national definition in Planning Policy for Travellers Sites. The Intend to Publish London Plan, however, has widened the definition of Gypsies and Travellers and when using that definition there is a requirement for seven pitches across the two sites, over the plan period. The additional pitches are expected to be met by intensification of the existing sites.</p>	<p>Following Direction from SOS, the London Plan has been amended to replace the terms 'Gypsy and Traveller' and 'Gypsies and Travellers' respectively with the phrases gypsy and traveller and gypsies and travellers in line with PPTS.</p> <p>Page 9 (figure 2) of the WF GTAA (2020) indicated that the need of 2 additional pitches according to the PPTS definition fall within 2018-2023, and so should be the 10 year target.</p>

CHAPTER 9: BUILDING A RESILIENT AND CREATIVE ECONOMY

REF	POLICY	PARA	PAGE	PROPOSED CHANGE	REASON FOR PROPOSING CHANGE
SOPC035		9.1	71	9.1 Waltham Forest is a London Borough in the midst of transformative economic change consisting of strong economic growth, a growing population and a thriving creative and cultural scene. The change brings positive developments comprising of new people, businesses and regeneration. However, policies in this chapter of the Local Plan have been prepared at a time of uncertainty associated with the Covid-19 pandemic. The full effects of the pandemic on employment and employment floorspace requirements are not yet known. These policies will be monitored and reviewed where necessary.	To improve drafting.
SOPC036		9.1	74	Updated figure 9.1, to reflect the change to the designation of several BEAs to be LSIS. Remaining BEAs are: Hatherley Mews East London Office Centre E10 Business Centre	
SOPC037		9.3	71	9.3 Prior to COVID-19, Waltham Forest was successfully transitioning from a low employment to a high employment borough with the proportion of the population in employment exceeding the London and Great Britain average from 2016-2019 . The percentage of Waltham Forest residents who are economically active (74.8%) is higher than the London average (78.1%), but lower than the national average (78.9%). The number of new business registrations grew by 98% between 2011-2018 compared to the London average of 58.5%. The median weekly pay of residents is well above the national average, at £680 per week, and is converging with the London average. ⁽³⁾ However, in 2018-19, 5% of residents were unemployed, ranking it 10 th highest out of London's 33 Boroughs.	Correction to data referenced.
SOPC038		9.5	72	9.5 The Digital and Creative sectors have flourished in the Borough over the last decade, partially due to the migration of businesses from other London boroughs. In recognition of this, a Local Creative Enterprise Zone is proposed to be has been	For better clarity and interpretation of the Plan.

				designated in Blackhorse Lane Road (see Policy 36 Blackhorse Creative Enterprise Zone).	
SOPC039		9.6	72	9.6 Waltham Forest's Employment Land Review (2019) has identified an objectively assessed need for c.8,100 jobs equating to 52,000 sqm of employment floorspace (identified B2, B8 and Class E Part G i, ii, iii) over the plan period. The Employment Land Audit (2020) demonstrates that this objectively assessed need can be delivered through efficient and effective use of existing employment sites.	For better clarity and interpretation of the Plan.
SOPC040	25		73	<p>Policy 25 - Supporting Economic Growth and Jobs Opportunities for employment growth in Waltham Forest will be maximised to ensure there is sufficient capacity to deliver a minimum of 52,000 sqm of additional employment floorspace across the borough over the plan period by:</p> <p>A. Focusing the delivery of new Class E Part G iii, B2 and B8 floorspace in SIL, LSIS, BEA, and non-designated employment sites;</p> <p>B. Focusing the delivery of Class E Part G i, ii floorspace in BEA and town centres;</p> <p>C. Supporting the delivery of a range of employment typologies in suitable locations, across the borough:</p> <p>i. Distribution uses – storage and distribution floorspace (B8), in locations within good proximity of strategic road network;</p> <p>ii. Industrial Space – light industrial (Class E, Part G iii) and the production and distribution of goods (B2) in smaller or sub-divided space within the borough's designated employment sites; and</p> <p>iii. New London Mix – high density office space (Class E Part G i and ii) ranging from small studio space, flexible co-working spaces to large offices in the designated centres or other locations with access to supporting amenities and services; and;</p>	

				D. <u>Supporting development</u> W where it does not lead to an overall loss of employment floorspace across the borough	
SOPC041	27		76	<p>Policy 27 - Safeguarding and Managing Change in Locally Significant Industrial Sites (LSIS) To safeguard and manage LSIS:</p> <p>A. The following uses are acceptable: i. Light industrial (Class E G iii) ii. General industry (Class B2) iii. Storage or Distribution (Class B8) iv. Waste sites (B2/B8/Sui Generis) v. Uses ancillary to the above;</p> <p>B. New development will be supported on LSIS, where it: i. provides improved high-quality, fit for purpose business space and infrastructure in the above use classes; ii. allows for future flexibility in the above uses, including future subdivision / and or amalgamation for a range of employment uses; and</p> <p>C. A masterplan approach to the intensification, <u>consolidation, and substitution</u> of industrial capacity in LSIS is supported (see Policy 30 - Industrial Masterplan Approach)</p>	For better clarity and interpretation of the Plan.
SOPC042	28		77	<p>Policy 28 - Safeguarding and Managing Change in Borough Employment Areas To safeguard and manage land in Borough Employment Areas:</p> <p>A. The following uses will be supported: i. Light industrial (Class E G iii) ii. Workspaces (Class E G) iii. General industry (Class B2) iv. Storage or Distribution (Class B8) v. Waste sites (B2/B8/Sui Generis) (i) Offices (Class E G i), <u>subject to compliance with Policy 40,</u> (ii) <u>Workspaces (Class E G)</u></p>	For better clarity and interpretation of the Plan.

				<p>(iii) Research and development of products or processes (Class E G ii), or</p> <p>iv. Uses ancillary to the above;</p> <p>B. New development will be supported where it:</p> <p>i. Provides improved high-quality, fit for purpose business space and infrastructure in the above use classes;</p> <p>ii. Allows for future flexibility in the above uses, including future subdivision / and or amalgamation for a range of employment uses; and</p> <p>C. A Masterplan approach to the intensification of industrial capacity in BEA is supported (Policy 30 – Industrial Masterplan Approach)</p>	
SOPC043		9.14	77	<p>9.14 Borough Employment Areas perform an important function for are similar to LSIS and vital part of the borough's economy. However, they can provide a wider economic function. BEAs are therefore considered areas suitable for not only industrial uses but also offices and workspace within Use Class E G Part I and II. (Class E-G). Other uses will only be considered if delivered as part of the Industrial Masterplan process (see Policy 30 – Industrial Masterplan Approach) and design mitigation will be important as set out in Policy 31 – Co-location Design Principles.</p>	For better clarity and interpretation of the Plan - reflecting changes to the acceptable uses in BEA, and omission in Policy 30.
SOPC044	29		78	<p>Policy 29 - Approach to Non-Designated Employment Land</p> <p>A. Development for industrial and related uses will be supported on non-designated employment areas where:</p> <p>A. It provides fit for purpose and high-quality business space and upgrades existing poor or old stock;</p> <p>B. Development which seeks to introduce residential or mixed-use elements to the employment location will only be supported where:</p> <p>i) It provides fit for purpose and high-quality business space and upgrades existing poor or old stock; and</p>	Amendment brings policy in line with London Plan Policy E7, and clarifies the relationship with LP2.

			<ul style="list-style-type: none"> ii) B. It uses the Agent of Change principle to mitigate design and sensitivity impacts; <u>and,</u> iii) <u>It provides replacement industrial, storage, or distribution floorspace as part of mixed-use intensification; or,</u> iv) <u>The loss of floorspace is justified with reference to marketing evidence of at least 12 months demonstrating no reasonable prospect of the site being retained in industrial and related uses; or,</u> v) <u>The proposal accords with an adopted allocation in a DPD for residential or mixed-use development.</u> <p>C. It delivers co-location of employment space with other uses including C3; E class uses and social and community infrastructure;</p> <p>D. For non-employment uses, where there is no reasonable prospect of the site being retained or used for employment uses subject to market evidence of at least 12 months; or</p> <p>E. It delivers intensification, consolidation or co-location</p>	
SOPC045	30	79	<p>Policy 30 - Industrial Masterplan Approach</p> <p>Masterplans for SIL, <u>or</u> LSIS and BEA will be supported where they accord with the following approach:</p> <p>A. Take a comprehensive approach and consider the whole SIL, <u>or</u> LSIS and BEA location;</p> <p>B. Do not lead to an overall loss and seek to provide a net increase of employment floorspace in the SIL, <u>or</u> LSIS or BEA location, <u>unless by agreement where capacity will be consolidated elsewhere in London in line with London Plan Policy E7;</u></p> <p>C. Provide uses in line with Policy 26 - Safeguarding and Managing Strategic Industrial Land (SIL) <u>and</u> Policy 27 - Safeguarding and Managing Change in Locally Significant Industrial Sites (LSIS), or Policy 28 - Safeguarding and</p>	For better clarity and interpretation of the Plan.

				<p>Managing Change in Borough Employment Areas, as appropriate;</p> <p>D. Provide upgraded facilities, demonstrated to be fit for purpose;</p> <p>E. Take account of the particular character and visions for of the area as identified in Appendix II Appendix 2 'Employment Land Character' & Visions and evidence base, with further guidance in the Industrial Intensification SPD;</p> <p>F. Are delivered in partnership and agreement by the Council and other stakeholders including the GLA;</p> <p>G. Undertake a two-stage identification process: i. Firstly, Sub Areas of Intensification and Consolidation; and ii. Secondly, Sub Areas of Potential Change;</p> <p>H. Deliver intensification and consolidation of sub areas; providing employment space ahead of any other development;</p> <p>I. Are supported by a Viability and Delivery Plan;</p> <p>J. Set out how existing businesses will be retained through a Retention and Relocation Strategy; and</p> <p>K. Are supported by a Servicing Strategy</p>	
SOPC046		9.19	79	<p>9.19 The London Plan sets out a masterplan approach to managing change in SIL and LSIS and BEA in Policy E7 Industrial intensification, co-location and substitution. The main aim of the masterplan approach is to make sure that industrial land is working efficiently and effectively to meet employment need now and over the plan period. The approach advocated in the London Plan is to deliver this is through intensification and consolidation to increase industrial employment floorspace capacity and support the economies of London and Waltham Forest.</p>	For better clarity and interpretation of the Plan.

SOPC047		9.20	79	<p>9.20 A comprehensive approach is required to deliver intensification and consolidation which considers both borough wide employment requirements and land capacity but also each employment land area designated location. The aim of the comprehensive approach to intensification and consolidation is to ensure that there is a net gain in employment floorspace to meet the overall need for of an additional 52,000 sqm of employment floorspace. Appropriate uses on SIL, and LSIS and BEA are set out in Policy 26, and 27.</p>	For better clarity and interpretation of the Plan.
SOPC048		9.21	80	<p>9.21 Waltham Forest's industrial employment areas – SIL, LSIS and BEA – have unique characteristics. Each area has a different role to play in the London-wide and local economy, now and in the future.</p> <p>The vision for each area over the plan period is different for each employment area. Appendix 2 'Employment Land Character' & Visions sets out the character and vision For of each employment site. These are based on the Employment Land Study 2019 and Employment Land Audit (2021). The vision for each industrial area in the borough over the plan period is unique. <u>Detail Further guidance</u> on how industrial intensification and consolidation can be delivered in each of the borough's industrial locations employment land areas will be set out in the Industrial Intensification Supplementary Planning Document.</p>	For better clarity and interpretation of the Plan
SOPC049		9.23	80	<p>9.23 To deliver intensification and consolidation, Areas of Intensification and Consolidation will be identified. These areas are defined as where there is an opportunity to deliver a large uplift in space for industrial businesses. This uplift is expected to be delivered on-site and ahead of any development on an Area of Potential Change. Areas of Potential Change are defined as areas where there may be opportunity to deliver different uses to those outlined as supported in Policy 26 - Safeguarding and Managing Strategic Industrial Land (SIL), and Policy 27 - Safeguarding and Managing Change in Locally Significant Industrial Sites (LSIS), or Policy 28 - Safeguarding and Managing Change in Borough Employment Areas as appropriate.</p>	For better clarity and interpretation of the Plan.

				<p><u>Where substitution of capacity from Waltham Forest to another location within London is proposed, this should give full consideration to the positive and negative impacts of substitution, including, but not limited to:</u></p> <ul style="list-style-type: none"> <u>Impacts on the local economy (including the labour market)</u> <u>Impacts on supply-chains</u> <u>Impacts of trip distance, congestion, and pollution</u> <p><u>Where all relevant impacts have been addressed to the satisfaction of Waltham Forest, the host borough, and the GLA, and the proposal results in a more efficient use of land, substitution of capacity will be supported. The consolidation of wholesale markets following this approach, and in line with London Plan Policy E4 F, will be supported.</u></p>	
SOPC050		9.25	80	<p>9.25 The current utilisation of land and sites is a key consideration. Where the existing uses are inefficient this may allow for intensification and consolidation of uses. Older stock will be more attractive to redevelop and intensify as it requires investment and repair. Less fragmented ownership may make delivery of intensification, or consolidation, easier to secure. A further consideration of delivering intensification and consolidation is the compatibility of industrial uses. Some uses are better suited to being located in close proximity. For instance, light industrial and office or studio space may make better neighbours than businesses with noisy or noxious operations. It is important to understand the future intentions and evolving needs of businesses, and for this to inform the production of <u>any</u> masterplan. he identification of both Areas of Intensification and Consolidation and Areas of Potential Change will be set out in the Industrial Intensification SPD</p>	For better clarity and interpretation of the Plan.

SOPC051		9.28	81	<p>9.28 Much of the industrial space across the SIL is of poor quality and out of date and therefore in need of updating.</p> <p>Masterplans and new development in SILs areas should not only aim to provide intensification, but also to improve the quality of industrial space to ensure it is fit for purposes and has the required supporting infrastructure to keep, seed and grow businesses.</p>	
SOPC052	33		84	<p>Policy 33 - Affordable Workspace</p> <p>Affordable workspaces are workspaces which are provided at rents maintained below the market rate for that space, for a specific social, cultural, or economic development purpose, and secured in perpetuity or for a period of at least 15 years by legal agreement.</p> <p>The delivery of affordable workspaces will be required to be provided:</p> <p>A. As part of the delivery of new employment floorspace of 1000m² or greater in SIL, LSIS, BEA and in town centres, where viable;</p> <p>B. As part of major mixed-use developments in town centres, in Strategic Locations or as part of regeneration schemes, where viable;</p> <p>C. On site, with a payment in lieu to be sought where this is not possible;</p> <p>D. via Section 106 agreements as detailed in the Planning Obligations SPD.</p>	For better clarity and interpretation of the Plan.

SOPC053		9.44	85	<p>9.44 <u>Evidence on the viability of delivering affordable workspace demonstrates variability across typologies and locations. As such, the level of discount from market rents and quantum of floorspace sought will be determined on a case by case basis.</u></p> <p>Evidence on appropriate reference market rent levels should be submitted as part of any planning application in line with guidance in the Planning Obligations SPD.</p>	For better clarity and interpretation of the Plan.
SOPC054	35		86	<p>Policy 35 - Railway Arches</p> <p>New development in the borough's railway arches, where it is not in an identified SIL, LSIS or BEA, will be encouraged by:</p> <p>A. Supporting current and future B2, B8 and Class E uses especially with proximity to stations, in Town Centres or as part of wider regeneration schemes;</p> <p>B. Promoting improvements to the appearance of railway arches through upgrades, active frontages and improvements to public realm;</p> <p>C. Supporting development that does not have adverse impact on the railway line;</p> <p>D. Ensuring development does not obstruct the public highway and pedestrian public realm; and</p> <p>E. Ensuring new development adheres <u>adopts</u> suitable design mitigations.</p>	For better clarity and interpretation of the Plan.

SOPC055		9.55	87	The Council recognises that the repurposing of industrial land as set out under Policy 30 (Industrial Masterplan Approach) could involve careful judgement and balance between different policy objectives. Crucially, site specific testing of different options and mix of uses as well as viability or deliverability issues will be important considerations. Accordingly, where a nuanced application of the policy can be justified in exceptional circumstances to support scheme implementation, an update on the policy position will be clarified on site-specific basis and applied through the Site Allocations Document (LP2).	For better clarity and interpretation of the Plan.
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CHAPTER 10: PROMOTING CULTURE AND CREATIVITY

REF	POLICY	PARA	PAGE	PROPOSED CHANGE	REASON FOR PROPOSING CHANGE
SOPC056	37		93	B iii. There is evidence that the existing use or business operation is not financially viable and the site has been prominently marketed at a realistic freehold or leasehold price for the same use for a continuous period of at least 24 12 months.	To align with London Plan which sets out that in those circumstances pubs should be marketed as a pub for at least 24 months at an agreed price following an independent valuation, and in a condition, that allows the property to continue functioning as a pub.

CHAPTER 11: DISTINCTIVE TOWN CENTRES AND HIGH STREETS

REF	POLICY	PARA	PAGE	PROPOSED CHANGE	REASON FOR PROPOSING CHANGE
SOPC057			98	Strategic objective. Revive (Post Covid-19) and 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, recreational and cultural needs within a 20 15-minute walk or cycle.	For better clarity and interpretation of the Plan.

SOPC058	39 (A)		99	Policy 39 (A) amended to read as follows: “Major Centre - Walthamstow Town Centre - This is the Borough's principal and economic hub. In accordance with London Plan classifications (Table A1.1) , it will be the focus for investment in major comparison retailing activities, leisure, cultural and tourist and other main town centre uses including offices and complementary evening and night-time uses.”	To align with new use class orders
SOPC059		11.41	110	New text as first sentence of paragraph as follows: “ Walthamstow major centre is identified in the London Plan (Table A1.1), as having a night-time economy classification NT2 with medium commercial growth potential and high residential growth potential ”.	For better clarity and interpretation of the Plan.
SOPC060	46(C)		110	Amended to read as follows: “Where active day-time uses are also proposed, such uses do not detract from the character and amenity of the surrounding shops and services; (i.e. providing a blank frontage due to closure during the day rather than maintaining an active street frontage); ”	For better clarity and interpretation of the Plan.
SOPC061		11.48	112	7 th bullet point amended to read as Preparation of town centre strategies as committed to under Policy 40 (G) 41 (H).	Correction of typographical error.

CHAPTER 12: SOCIAL AND COMMUNITY INFRASTRUCTURE

REF	POLICY	PARA	PAGE	PROPOSED CHANGE	REASON FOR PROPOSING CHANGE
SOPC062		12.7	116	2 nd sentence amended to read as follows: As Local Planning Authority, the Council works closely with partners including WEL Clinical Commissioning Group (15) to plan for the future needs of the borough and will continue to	For better clarity and interpretation of the Plan.

				work in partnership to ensure that new development is provided with sufficient healthcare services in the most suitable locations, at the right time.	
SOPC063		12.7	116	Footnote 15 amended updated to read as follows: <u>The seven north east London clinical commissioning groups (CCGs) – City and Hackney, Newham, Tower Hamlets, Waltham Forest, Barking and Dagenham, Havering and Redbridge – will become a single organisation called North East London CCG from 1 April 2021.</u>	For better clarity and interpretation of the Plan.

CHAPTER 13: PROMOTING HEALTH AND WELLBEING					
REF	POLICY	PARA	PAGE	PROPOSED CHANGES	REASON FOR PROPOSING CHANGE
SOPC064	50		124	H. Supporting the enhancement and inclusive access to public green and open spaces, <u>waterways and</u> sports and recreation facilities (see Policy 80 Parks Open Space Sport and Recreation <u>and Policy 85 - Protecting and Enhancing Waterways and River Corridors</u>);	For better clarity and interpretation.
SOPC065	50		124	C. Encouraging the use of Health Impact Assessments (see Policy 51 Health Impact Assessments) in all major applications;	For better clarity and interpretation.
SOPC066	53(c)		128	Noise and vibration from deconstruction and construction activities must be minimised and mitigation measures put in place to limit noise <u>and vibration</u> disturbance in the vicinity of the development.	For better clarity and interpretation.
SOPC067	54		129	Amend policy statement as follows: “ <u>In accordance with London Plan Policy E9 (D) and (E),</u> proposals for new hot food takeaways will only be permitted where:...”	To acknowledge London Plan policy requirements drivers and for better clarity and interpretation.

CHAPTER 14: CREATING HIGH QUALITY PLACES

REF	POLICY	PARA	PAGE	PROPOSED CHANGE	REASON FOR PROPOSING CHANGE
SOPC068	56		132	Add additional clause T: Support and encourage masterplan approaches where possible to deliver the benefits of cohesive high quality design	To encourage a masterplan approach towards development.
SOPC069	57		134	Amend para 1, policy 57 to read: In some locations such as growth areas, and site allocations identified as suitable for tall buildings in the Local Plan Part 2 and Skyline Study, and public transport interchanges.	To capture the environmental context on the sites in which tall buildings are more likely to be proposed.
SOPC070	57		136	Add an additional point to clause F to read: vii. Contribute to creating a coherent skyline in line with the Skyline Study that supports the Local Plan Part 2	To ensure that tall buildings that are proposed contribute to creating a coherent rather than disjointed skyline.

CHAPTER 15: SUSTAINABLE TRANSPORT AND INFRASTRUCTURE

REF	POLICY	PARA	PAGE	PROPOSED CHANGE	REASON FOR PROPOSING CHANGE
SOPC071			149	Figure 15.2 Council's existing and future strategic cycle network	Review & update map as TfL recommended.
SOPC072	62		144	I – 'Support car club development, cycle hire facilities and other sustainable transport initiatives, such as local bus service improvements , electric vehicle, charging infrastructure and pocket parks, in line with Policy 68 - Managing Vehicle Traffic and Policy 69 - Electric Vehicles (EV)';	Local bus service improvement has been included as one of the parameters for granting planning permission for new development.
SOPC073		15.9	144	(...). The promotion of ' 15-minute 20-minute neighbourhoods' will increase well-being benefits and physical activity amongst people who travel within Waltham Forest, (...)	Factual update to reflect the Council's Corporate Strategy as published – Waltham Forest Public Strategy 2020.
SOPC074	65		153	A. A Transport Assessment (TA) showing how the development will contribute towards meeting local and London-wide transport objectives, identifying and mitigating development impacts , and detailing measures to achieve this (including street improvements, on-site facilities, and engagement);	Editorial change

SOPC075	67		154	Construction Logistic Plans (CLPs) B. Minimise construction traffic and manoeuvres that place other road users at risk by providing or ensuring safe routes to the site for construction traffic, and avoid areas with levels of vulnerable road users, including schools, town centres and areas with high density of pedestrians and cyclists <u>people walking and cycling</u> ;	Editorial change. This term more accurately conveys that people use a variety of modes at different points in time and avoids connotations of different people belonging to separate groups depending on their travel choices.
				J. Be required prior to commencement of the development. This will be required at sites that will or have the potential to that have the potential to impact on the highway network public transport services, sustainable transport, have difficult access, may affect nearby developments or surrounding residents; and	Editorial change
SOPC076	68		156-58	<u>B. New mixed-used developments should consider standards for each individual use set out in the Parking Standards, depending on its quantum and size. Parking should be distinct for different uses.</u>	For better clarity and interpretation of the Plan.
				<u>C. B.</u> Proposals must not exceed maximum parking standards set out in the London Plan and the Parking Standards included in Appendix 1 'Parking Standards	
				<u>H. G.</u> Car Parking in new developments for GPs, health and educational facilities will be supported by following the Council's Parking Standards and London Plan policies	No changes. Appendix 1 Parking Standards of the Local Plan, table 1.6 "Other public buildings" includes the standards for these types of uses.
				<u>K. J.</u> Where parking is provided as part of a development, proposals must be supported with a Car Parking Management Plan detailing the mechanism for leasing spaces, the provision of disabled parking to meet future demand, and activation of passive electric charge points, <u>in accordance with the forthcoming London Plan guidance on Parking Design and Management</u> ;	For better clarity and interpretation of the Plan
				<u>N. M.</u> Where roads in close proximity to the site are not managed, or <u>not</u> adequately managed by parking controls, appropriate financial contributions will be sought to secure the delivery of CPZs;	Editorial change.
		Estate Regeneration	New bullet to address repurposing of the parking spaces.		

				<p><u>Q. Provision should be flexible for different users and adaptable to future re-purposing to benefit the whole community for pocket parks, play spaces or additional cycle parking</u></p> <p>Car Clubs R. Q (...) S. P (...) T. Q (...)</p>	Amend the bullet numbering as it has two items with the same letter.
SOPC077		15.37	159	Car clubs also provide an important role in supporting people to transition away from car ownership, especially when paired <u>with</u> wider incentives, such as management of residential parking, improvements in public transport, and new cycling and walking facilities.	Editorial change
SOPC078	69		159	<p>C. Incentivising ownership and use of electric vehicles, including permitting only electric vehicles at new residential development, reduced rate parking charges or leases for spaces, or subsidised electricity <u>when car parking has been justified by transport assessment</u>;</p> <p>D. Contributing <u>to</u> the borough's publicly accessible rapid charging and on-street charging network, especially where development is served by electric vehicles for taxis and deliveries and servicing.</p>	Electric vehicles car parking has also justified by a transport assessment
SOPC079		15.42	160	'The benefits of digital technology extend further. Employing a Smart Cities approach, enhanced digital infrastructure can deliver many further benefits and solutions to residents and businesses in the borough; such as reducing the need to travel <u>for work</u> - thereby reducing <u>peak</u> demand on public transport and improving <u>congestion and</u> air quality whilst at the same <u>time</u> promoting productivity and the overall economy'.	Editorial changes

CHAPTER 16: ENHANCING AND PRESERVING OUR HERITAGE

REF	POLICY	PARA	PAGE	PROPOSED CHANGE	REASON FOR PROPOSING CHANGE
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SOPC080	76		173	B. Substantial harm and complete loss of Non-Designated heritage assets will not be supported <u>without clear and robust justification required for demolition</u>	To align more effectively with the Locally Listed Building Policy (77) as Locally listed buildings are also Non-Designated Heritage Assets.
SOPC081	72		167	Amend second bullet point after policy to read: Non-designated Heritage assets: Locally Listed buildings; Parks and Gardens of Local Historic Interest; and the Highams Area of Special Character; <u>and other archaeological assets (that are not demonstrably equal in significance to Scheduled Monuments).</u>	Added for clarity between designated and non-designated archaeological assets.
SOPC082	75		172	Amend point D to read D: Investigations of non-designated heritage assets of archaeological interest that fall either inside or outside of the identified and reviewed Archaeological Priority Zones, that hold or potentially hold evidence of past human activity, <u>should be undertaken by the developer, and the council will draw on appropriate advice from archaeological experts to assess the results.</u> will be assessed by archaeological experts;	To improve the clarity of the clause.

CHAPTER 17: PROTECTING AND ENHANCING THE ENVIRONMENT

REF	POLICY	PARA	PAGE	PROPOSED CHANGES	REASON FOR PROPOSING CHANGE
SOPC083	79		178	<p>A. The preservation and enhancement of green and blue infrastructure and access to open spaces by:</p> <p>i. Protecting Green Belt, Metropolitan Open Land (MOL) <u>and other open space of designated importance</u> from inappropriate development and improving active access for pedestrians and cyclists <u>walking and cycling</u> where appropriate;</p>	<p>In response to London Wildlife Trust - to broaden the hierarchy to include other critical designations to include LGS, SINC and statutory SPA, SAC etc.</p>
SOPC084	79		178	<p>B. In the event that development proposals are allowed in exceptional circumstances in Green Belt or MOL within the meaning of national policy and the London Plan, they should:</p> <p>i. Implement a high standard of design in accordance with the principles set out in chapter 7 (Creating High Quality Places)</p> <p>ii. Complement and improve the quality of existing open space uses and landscaping</p> <p>iii. Enhance the green infrastructure network through better connectivity and the creation of new open spaces whilst also conserving their natural and historic value;</p> <p>iv. Establish and/or extend the Borough's Greenways, Green Corridors and provide landscaping along transport routes where possible; and</p> <p>v. New development adjacent to existing Green Chains and Green Corridors</p>	<p>To ensure consistency with the London Plan 2021</p>

				<p>must be designed in a way that contributes towards the green infrastructure network.</p> <p>vi. New development must be designed to maximise opportunities for urban greening (as defined within London Plan 2021 Policy G5) through appropriate landscaping schemes and planting of trees.</p>	
SOPC085	79	17.11	178	<p>Integral in this is Green Belt and Metropolitan Open Land (MOL). Chapter 13 of the NPPF sets out the fundamental aims of Green Belt policy and the framework for its protection from urban sprawl. In a London context, these apply equally to MOL which provides strategic open land within the urban area. In combination with addition to Sites of Importance to Nature Conservation(SINC) Local Green Space (LGS) and statutory sites (SSSIs, SPA, SAC). Together, Green Belt and MOL provide some of Waltham Forest's most important natural resources,. Together these make making a valuable contribution to the London-wide green infrastructure network....</p>	In response to London Wildlife Trust - to broaden the hierarchy to include other critical designations to include LGS, SINC and statutory SPA, SAC etc.
SOPC086	79		178	<p>Any improvements to access routes or green corridors should not result in any adverse effects on the integrity of the Epping Forest Special Area of Conservation (See Policy 83).</p>	To take into account comments of CoLC and NE
SOPC087	81 C		185	<p>C. Where there are existing biodiversity resources either on-site or in the vicinity of a development site, the developer must provide measures for their retention, the integration of existing wildlife habitats and features, and their restoration and enhancement where appropriate. Where retention, restoration or enhancement measures are not considered possible, mitigation and compensation measures which promote the principle of net gain in line with NPPF para 174 should be clearly set out with supporting evidence for their effectiveness and relevance in relation to supporting the specific biodiversity value of the borough and its key international sites; All development proposals are required to;</p>	Following representation and clarification from the Environment Agency regarding non-compliance with CIEEM guidance. This replacement text provides this.

				<ul style="list-style-type: none"> ② demonstrate minimising the impacts of development on biodiversity in accordance with the mitigation hierarchy; ② demonstrate a minimum 10% biodiversity net gain using the Defra Biodiversity Metric 2.0 (or subsequent version), even where development proposals do not result in biodiversity loss; and ② prepare a long-term monitoring and maintenance plan for biodiversity and habitat proposals for a minimum period of 30 years, including both on- and off-site measures.' ② demonstrate that any off-site measures proposed, seek to enhance locally and nationally important priorities; 	
SOPC088	81	17.20	185	Protected species and priority species of plants and animals are defined in the Waltham Forest, Lea Valley , London and UK Biodiversity Action Plans (BAPS).	Comment raised by LWT
SOPC089	81 D		185	D. Where opportunities arise, d Development proposals should seek to provide measures to support species and habitats through the use of landscaping on or adjacent to buildings.	To address LVRPA comments
SOPC090	81 D		185	This may involve the inclusion of living roofs and walls or and other measures (such as bird boxes) which provide space for species to nest, roost or hibernate;	To address soundness issue raised by Waltham Forest Swifts Group.
SOPC091	81	17.23	187	The Draft London Plan (Policy G5) promotes the importance of sustainable urban greening as a fundamental element of site and building design proposals . This may include the incorporation of living roofs and walls or spaces for species to nest, roost or hibernate. Examples include the installation of Swift bricks, bird/bat boxes in developments and providing safe routes for hedgehogs between different areas of habitat. This is	To address soundness issue raised by Waltham Forest Swifts Group.

				<p>especially important in order to protect species or mitigate against any unavoidable loss, such as at brownfield sites.</p>	
SOPC092	81 H - K			<p>H. Development proposals should protect and enhance the nature conservation or geological interest of nationally important wildlife sites as shown on the Policies Map. Development proposals will not normally be granted planning permission where they pose adverse direct or indirect effects on any land or area within the identified Sites of Special Scientific Interest (SSSI), Sites of Importance to Nature Conservation (SINC), Special Areas of Conservation (SAC), Ramsar sites, or Special Protection Areas (SPA);</p> <p>I. Development on or nearby to Walthamstow Reservoirs Special Protection Area, Walthamstow Wetlands and Walthamstow Marshes Sites of Special Scientific Interest must not have a detrimental impact on the biodiversity or nature conservation value of the site. Development may only be permitted where appropriate mitigation or compensatory measures are put in place;</p> <p><u>H. Development proposals should protect and enhance the nature conservation or geological interest of nationally important wildlife sites as shown on the Policies Map. Development proposals will not normally be granted planning permission where they pose adverse direct or indirect effects on the biodiversity or nature conservation value of any land or area within the identified Sites of Special Scientific Interest (SSSI), Sites of Importance to Nature Conservation (SINC), Special Areas of Conservation (SAC), Ramsar sites, or Special Protection Areas (SPA) without appropriate mitigation measures in place prior to development. These sites are shown on the Policies Map and include but are not limited to the Walthamstow Reservoirs Special Protection Area.</u></p>	<p>To accord with the observations of Natural England. We suggest some reorganisation of this policy. (We would suggest starting with Points H-K regarding protecting existing designated biodiversity sites and geological sites from adverse effect. Point I. could be merged with Point H. and we ask whether other designated sites should be added to the list of Walthamstow Reservoirs SPA, Walthamstow Wetlands and Walthamstow Marshes SSSI; there may also be some overlap between Point I.)</p>

				<p><u>Walthamstow Wetlands and Walthamstow Marshes Sites of Special Scientific Interest and Epping Forest SAC.</u></p> <p><u>↓I. Development proposals which would cause harm to a designated site with geodiversity value will not be permitted unless any damaging impacts can be prevented by appropriate mitigation measures;</u></p> <p><u>✗ J. Development proposals which would affect a designated site with geodiversity value should seek to retain, restore and enhance the geological interest where possible</u></p>	
SOPC093	82	17.30	188	<p>The trees of Waltham Forest are an important asset that provide numerous benefits to residents and visitors. <u>The London Urban Forest Plan (2020) sets out the benefits of the urban forest and its place in the national park city.</u> These benefits include their contribution to <u>positive physical and mental health</u>, character and place making, the provision of habitats and biodiversity, the provision of shade and reductions to the urban heat island effect. Trees also play an important role in enhancing air quality and reducing surface water flooding. As such, it is important that existing trees are retained and complemented with new tree planting.</p>	Representation from London Wildlife Trust for clarity.
SOPC094	83		190	<p>The Council will protect and enhance the natural environment of the Epping Forest and its Special Area of Conservation (SAC) and seek to ensure that development proposals contribute to the <u>avoidance and</u> mitigation of adverse recreational and air quality effects on the SAC by ensuring:</p> <p>A. All new development within <u>the (6.2km) Zone of Influence (ZOI)</u> of the boundary of the Epping Forest SAC (see Map) likely to have a significant effect on the integrity</p>	To take account of the threshold set out in the 69 Browning Road appeal decision APP/U5930/W/20/3245750 and representation made by NE and the CoLC.

of the Epping Forest Special Area of Conservation (SAC), either alone or in combination with other plans or projects, will be required to demonstrate that adequate measures are put in place to avoid or mitigate any potential adverse effects through contribution to the mitigation of recreational and air quality impacts on the Epping Forest SAC as follows:

~~i. Developments of 1-10 99 residential units will be expected to provide measures to ensure that the development provides maximum ecological benefit on the site in~~

~~line with the requirements of Policy 86;79 and 81;~~

~~ii. Developments of 10—99 residential units will be required to contribute to SAMMs (Strategic Access Monitoring and Management Strategy) in addition to the above and~~ in line with ~~the current~~ mitigation measures agreed with the Conservators of Epping Forest and partner ~~local~~ authorities. ~~Larger schemes will be required additionally to contribute to the mitigation of development impacts on the SAC via the provision of SANGS (Suitable Alternative Natural Green Space) as set out in the Council's SANGS Strategy and Mitigating the Impact of Development on SAC/SPA SPD;~~

~~These will be set out in the Council's Mitigating the Impact of Development on SAC/SPA SPD;~~

~~iii. ii. Developments of 100+_ units within the borough will be required to contribute to the mitigation of development impacts on the SAC via the provision of SAMMS/SANGS (Suitable Alternative Natural Green Space) as set out in the Council's SANGS Strategy and Mitigating the Impact of Development on SAC/SPA SPD;~~

B. Development proposals affecting Epping Forest should be sensitive and proportionate, delivering enhancements where possible and must not contribute to adverse impacts on ecological integrity, amenity or visitor enjoyment;

				C. Planning applications for development and allocations within 500m of the Epping Forest SAC must demonstrate through project level HRA that the development will not generate adverse urban effects on the integrity of the SAC.	
SOPC095	83	17.45	192	<p>The Council therefore has duties as a competent authority to ensure that planning policy and decisions do not result in adverse effects upon the SAC. The Councils' Habitats Regulations Assessment (HRA) confirms that new residential development above the level of existing will have a significant effect on the ecological integrity of the Epping Forest SAC alone and in combination with other plans (HRA). Development proposals which may result in urbanisation, air quality and/or recreational effects will be encouraged to have early discussions and engagement with Natural England on potential mitigation measures. The Council is working with partners and other Local planning Authorities via The Epping Forest Memorandum of Understanding Oversight group to secure both a Mitigation Strategy is currently in development, and once finalised will comprise and appropriate package of mitigation measures to address negative impacts on the site. <u>In addition to SAMMS contributions and SANGS, Waltham Forest will develop supplementary mitigation strategies (eg air quality) in order to promote the delivery of an overall help to deliver the mitigation strategy developed</u> in cooperation with surrounding authorities, and and which will be funded through developer contributions. <u>These will be set out in the Council's SANGS Strategy and Mitigating the Impact of Development on SAC SPD once published.</u></p>	In response representation made by the CoLC
SOPC096				Table 17.2	Should be deleted as it refers to interim strategy which will be out of date
SOPC097	84		193	Proposals which affect the Lee Valley Regional Park will ensure that:	

			<p>A. Development proposals include measures for the protection, enhancement and where possible, the extension of the borough's network of Green Corridors.</p> <p>B. Development proposals affecting the Lee Valley Regional Park should be sensitive and proportionate, delivering enhancements where possible and must not contribute to adverse impacts on ecological integrity, amenity or visitor enjoyment.</p> <p>C. <u>B.</u> Development proposals in proximity to the Lee Valley Regional Park should improve access and links to the park and its waterways.</p> <p>D. <u>C.</u> Development proposals affecting the Lee Valley Regional Park <u>should be sensitive and proportionate,</u> must not contribute to adverse impacts on amenity, ecological integrity or visitor enjoyment; and will be expected to deliver enhancements where possible. The Council supports the Lee Valley Regional Park Authority's Park Development Framework. The contents of the <u>Lee Valley Park Development Framework</u> as adopted is a material consideration in the determination of planning applications.</p> <p>E. <u>D.</u> Development that affects the Lee Valley Special Protection Area will contribute to the mitigation of adverse effects on the Special Protection Area (SPA).</p> <p>F. <u>E.</u> Planning applications for development at Blackhorse Lane will need to be accompanied by a project level HRA to ensure the development will not generate adverse urban effects on the integrity of the Lee Valley SPA and Ramsar.</p>	
SOPC098	84	193	<p>E. <u>D.</u> Development proposals will not normally be granted planning permission where they pose adverse direct or indirect effects on any land or area identified with the Lee Valley SPA/Ramsar. Development that affects the Lee Valley Special Protection Area will contribute to the mitigation of adverse effects on the Special Protection Area (SPA).</p>	To accommodate NE comments

SOPC099	84	17.47	193	<p>17.47 The Lee Valley Regional Park is a major asset for Waltham Forest providing valuable benefits to local communities in terms of access to nature and to healthy outdoor recreation. The Council supports Lee Valley Regional Park Authority 's Park Development Framework. The Council will work cooperatively with the Lee Valley Regional Park Authority in protecting and enhancing the Lee Valley Regional Park and the Special Protection Area. Development proposals that would result in additional urbanisation or recreation effects will be encouraged to have early discussions and engagement with Natural England on potential mitigation measures.</p>	To accommodate NE comments
SOPC100	85	17.51	194	<p>17.51 The presence of the River Lee and the Lee Valley Regional Park are among the key defining characteristics of the borough .Water quality and water resource management have direct impacts on the public's ability to enjoy the Park's leisure, sporting and nature conservation facilities and sites. Water is intrinsic to many of the Park's nationally and internationally recognised sites, such as the Lee Valley Special Protection Area (SPA) and London Borough of Waltham Forest Local Plan 194 Proposed Submission Local Plan (LP1) - Shaping the Borough 17 Protecting and Enhancing the Environment RAMSAR site (Following the international Convention on Wetlands held in Iran in 1971).The Park is also host to the Walthamstow Reservoirs and Marshes, the Waterworks attraction on Lea Bridge Road, in addition to boating activities on the River Lee and the River Lee Navigation navigation Canal(s).</p>	At the request of the Canals and Rivers Trust.
SOPC101	85		194	<p>B.Flood Defence Consent is obtained from the Environment Agency for works in, under, over and adjacent to watercourses;</p>	To incorporate corrections on consents from Environment Agency

				<p>C. Environmental Permits are required for any activities which will take place: on or within 8m of a main river (16m if tidal) on or within 8 of a flood defence or culvert (16m if tidal) involving quarrying or excavation within 16m of a main river, flood defence or culvert in a floodplain more than 8m from the riverbank, culvert of flood defence structure and there is no planning permission.</p> <p><u>B) An Environmental Permit is obtained from the Environment Agency for works in, under, over and adjacent to watercourses; Environmental Permits are required for any activities which will take place: on or within 8m of a main river (16m if tidal) on or with-in 8 of a flood defence or culvert (16m if tidal) involving quarrying or excavation within 16m of a main river, flood defence or culvert in a floodplain more than 8m from the riverbank, culvert of flood defence structure and there is no planning permission.</u></p>	
SOPC102	85	17.50	194	<p>Waterways in Waltham Forest support a range of ecological resources, many of which are covered under European and national legislation. Enhancement measures <u>Environmental net benefits such</u> as naturalisation and deculverting are valuable for the management of nature conservation and flood risk of waterways <u>and development proposals should investigate potential environmental net benefits and should aim to deliver river restoration and deculverting in line with the Thames River Basin Management Plan.</u> Wider regeneration objectives can be met through the enhancement of the quality and amenity value of the water environment. To ensure this is achieved, the Council will consult the Environment Agency so that adequate evaluation can be undertaken and statutory consents can be granted. It is preferable that Flood Defence Consent is obtained after planning permission has been granted. <u>It is preferable that an Environmental Permit is obtained after planning permission has been granted.</u></p>	To incorporate corrections on consents from Environment Agency and LWT

SOPC106	91		202	<p>Ensuring that new development that is seen to have the potential to cause adverse effects on water quality provides appropriate mitigation to alleviate risk; <u>No deterioration of water quality. Where development is seen to have the potential to cause adverse effects on water quality provides appropriate mitigation to alleviate risk must be provided;</u></p> <p>Amend Point C to read "<u>Development must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption). Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met</u>".</p>	To create a more consistent position through the local plan.
SOPC107	92		204	<p>Amend point A to Read Ensuring that site investigation and desk-based research is undertaken, <u>and a Preliminary Risk Assessment (PRA) is submitted with all planning applications,</u> in line with current guidance for new developments proposed on contaminated or potentially contaminated <u>land such as referenced in The Environment Agency's approach to groundwater protection (2018), the Model Procedures for the Management of Land Contamination (CLR11), and Managing and reducing land contamination: guiding principles (GPLC),</u> and remediation proposals are agreed to deal with any identified contamination;</p>	Amended to clarify and benefit the policy by making it more effective
SOPC108	93		204	<p>Reword Point A to read: Directing potentially vulnerable development away from high-risk flood areas unless there is clear evidence that specific flood-risk mitigation strategies can be implemented; <u>by directing potentially vulnerable development away from high-risk areas, in line with the sequential test and the Waltham Forest Level 2 SFRA [insert SFRA reference]. If, in some cases, development passes the sequential test, specific flood-risk mitigation strategies should be implemented.</u></p>	Changes made to ensure consistency with the (Point A) NPPF para 155 and 160 and (Point B) NPPF PPG alignment with Table 3 of the National Planning Practice Guidance: Flood Risk and Coastal Change (section 25).

				Reword Point B to read: Ensuring essential infrastructure and <u>Ensuring essential infrastructure and more vulnerable uses within flood zone 3a pass the exception test.</u> less vulnerable uses within flood zone 3a pass the exception test;	
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CHAPTER 19: PROMOTING SUSTAINABLE WASTE MANAGEMENT					
REF	POLICY	PARA	PAGE	PROPOSED CHANGE	REASON FOR PROPOSING CHANGE
				NO PROPOSED CHANGES	

CHAPTER 20: DELIVERING THE PLAN					
REF	POLICY	PARA	PAGE	PROPOSED CHANGE	REASON FOR PROPOSING CHANGE
SOPC109		20.9	214	20.9 With regard to improvements in transport infrastructure, funding opportunities include: <ul style="list-style-type: none"> • Local Implementation Plan (LIP)/Streetspace funding • Transport for London (TfL) Growth Fund • TfL Step Free Programme • TfL Liveable Neighbourhoods fund • Department for Transport (DfT) Access for All Programme • Low Emissions Neighbourhood funding • <u>Developer contributions</u> 	To include developer contributions as a critical way to fund improvements in transport infrastructure.

APPENDIX 1: PARKING STANDARDS

REF	POLICY	PARA	PAGE	PROPOSED CHANGE	REASON FOR PROPOSING CHANGE
SOPC110		1.1	222	The London Borough of Waltham Forest (LBWF) is proud of its commitment to ensuring everyone in the borough can choose to walk and cycle. In recent years LBWF has successfully encouraged modal shift to sustainable transport, working with developers to make the most of opportunities to meet London-wide targets for walking, cycling and public transport use. A significant way of facilitating a modal shift to cycling is by providing appropriate levels of cycle parking which are fit for purpose, secure and well-located. Appropriate levels of cycle parking should accommodate current existing demand and also future growth in cycle use. New developments or developments undergoing a change in use should provide cycle parking in accordance with LBWF's minimum standards set out in Table 1, and should be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards and forthcoming London Plan guidance on Parking Design and Management .	To include reference to the forthcoming London Plan Guidance on Parking Design and Management.
SOPC111		1.50	231	When the Council considers application for dropped kerbs for existing properties the following is considered: <ul style="list-style-type: none"> Impacts on traffic and road safety, particularly pedestrians and cyclists for walking and cycling. 	For better clarity and interpretation of the Plan
SOPC112			222-236	See below for proposed changes to Car Parking Standards to reflect changes in Use Class Orders and the introduction of Class E	See below for proposed changes to Car Parking Standards to reflect changes in Use Class Orders and the introduction of Class E

APPENDIX 2: Employment Land Characters

REF	POLICY	PARA	PAGE	PROPOSED CHANGE	REASON FOR PROPOSING CHANGE
SOPC113		Table 2.1	237	Deletion of vision column.	This detail is to be elaborated in the Industrial Intensification SPD.

SOPC114		Table 2.2	<p>239</p> <p>Addition of all BEAs except: Hatherley Mews, East London Office Centre, and E10 Business Centre</p> <p>To be upgraded to LSIS, and included in Table 2.2.</p> <p>Re-referenced. Deletion of vision column.</p>	<p>Reflecting changes to the acceptable uses in BEAs, to address conformity issues highlighted by the GLA, and to ensure that the plan strategy for protecting and delivering additional industrial land is not undermined by allowing non-industrial uses to replace industrial and related uses on previously designated BEAs.</p>
SOPC115		Table 2.3	<p>240</p> <p>Deletion of all BEAs except: Hatherley Mews, East London Office Centre, and E10 Business Centre</p> <p>Re-referenced. Deletion of vision column.</p>	<p>Reflecting changes to the acceptable uses in BEAs, to address conformity issues highlighted by the GLA, and to ensure that the plan strategy for protecting and delivering additional industrial land is not undermined by allowing non-industrial uses to replace industrial and related uses on previously designated BEAs.</p>

Parking Standards

SOPC116

Table 1: Minimum Standards

Use Class	Description	Suggested Cycle Parking Standards (2020)	
		Long Stay	Short Stay
RETAIL AND SERVICES			
<p><u>Standard Applies to Class E</u> (Former Class A1 Shops including retail warehouses)</p>	Food Retail	From a threshold of 100 sqm: 1 space per 175 sqm gross external area (GEA)	<p>From a threshold of 100 sqm:</p> <p>Mini Holland areas:</p> <p>First 750 sqm: 1 space per 20 sqm</p> <p>Thereafter: 1 space per 150 sqm (GEA)</p> <p>Rest of borough: first 750 sqm</p> <p>Space per 40 sqm;</p> <p>Thereafter: 1 space per 300 sqm (GEA)</p> <p>From a threshold of 100 sqm:</p> <p>First 1000 sqm: 1 space per 125 sqm</p> <p>Thereafter: 1 space per 1000 sqm</p>

	Non-food Retail	From a threshold of 100 sqm: first 1000 sqm: 1 space per 250 sqm thereafter: 1 space per 1000 sqm	
Standard Applies to Class E (Former A2 Financial and professional)	Offices (business and professional)	From a threshold of 100 sqm: 1 space per 175 sqm	From a threshold of 100 sqm: Mini Holland areas: 1 space per 20 sqm (GEA) Rest of borough: 1 space per 40 sqm (GEA)
Standard Applies to Class E (Former A3 Food and drink)			
A4	Public houses and wine bars		
A5	Takeaways		

SG	Taxi/mini cab offices	No standard. To be considered individually.	
BUSINESS			
<u>Standard Applies to Class E</u> <u>(Former B1 (a)</u> B1 (b), B1 (c)	Offices Research and development, light industry	1 space per 50m2	1 space per 500 sqm for visitors with minimum 2 spaces
B2 and B8	General industry Storage and Distribution	B2: 1 space per 75m2 B8: 1 space per 250m2	1 space per 1000 sqm

RESIDENTIAL			
C3	Flats and houses	1 space per studio; 1.5 spaces per 1 bedroom unit; 2 spaces per 2 bedrooms unit; 3 spaces per all other dwellings	1 space per 40 units for visitors with minimum 2 spaces
OTHER RESIDENTIAL			
SG	Hostels	1 space per 2 resident bedspaces	1 space per 20 bedspaces with minimum 2 spaces
SG	Houses in multiple occupation (HMOs)	1 space per habitable room	
C1	Hotels (20 beds and over) and motels	2 spaces per 3 staff	1 space per 10 bedrooms

Table 1.4 Non-Residential Uses

<p>Offices (Business, financial and professional services) <u>Standard Applies to Class E (Former Class A2 and B1(a))</u> <u>Standard Applies to Class E (Former A1 Shopping)</u></p>
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Table 1.5

Hotels, public houses and restaurants	
Hotels, Motels, boarding and guest houses	<p>1 space per 20 bedrooms, depending on PTAL (plus 1 coach parking space per 100 guest bedrooms. Allowance should be made for taxi drop offs)</p> <p><u>Class E (Former A3)</u> standards apply to restaurants/bars open to non-residents</p>

Post Submission Proposed Changes

Below are Changes that have been proposed after the submission of the Local Plan on 30th April 2021:

Post Submission Proposed Changes						
REF	CHAPTER	POLICY	PARA	PAGE	PROPOSED CHANGE	REASON FOR PROPOSING CHANGE
PSPC001	4		4.18	21	Steers most new development to those places that offer the best access to services, facilities and public transport (both now and for the foreseeable future). This can help reduce the need to travel, as well as making best use of existing infrastructure and previously developed land in built-up areas."	To acknowledge the role of public transport in promoting sustainable development.
PSPC002		Policy 6 (A)		26	Make efficient use of land through mixed use development and intensification (Policies 7 and 8); and mixed-use development (Policy 5 – Encouraging Mixed Use Development and Intensification);	Correction of referencing error.
PSPC003				34	Site boundary of SIL 7 (Former Town Gas Works amended to remove land at southern extension linking Orient Way	Correction of mapping error.
PSPC004			Glossary	290	Secured by Design – police flagship initiative supporting the principles of designing out crime; e.g. windows and doors that carry secured by design approval and have been assessed to provide a high degree of resistance to break-ins. Secured by Design - A crime prevention initiative operated by the Police Service to guide and encourage those engaged within the specification, design and build of new homes and other properties, including refurbishments to adopt crime prevention measures. Design Guides published on the SBD website cover a range of building sectors, including residential, education, health, transport and commercial and provide a valuable source of reference to architects, developers, self-builders, local authority planners and police officers.	For better referencing and guidance.

PSPC005	16		16.7	167	<p>Not all of Waltham Forest's heritage is designated, and it is therefore important to recognise the value of our undesignated historic environment in planning for the future. Many buildings are of significance to the local environment even though they might not be protected by law. <u>Therefore, a balanced judgement is required for Development proposals affecting non-designated heritage assets involving the scale of harm and significance of the asset in question.</u></p>	To align more accurately with para.197 of the NPPF
PSPC006	9	30		79	<p>Policy 30 - Industrial Masterplan Approach Masterplans for SIL, <u>or</u> LSIS and BEA will be supported where they accord with the following approach:</p> <p>A. Take a comprehensive approach and consider the whole SIL, <u>or</u> LSIS and BEA location;</p> <p>B. Do not lead to an overall loss and seek to provide a net increase of <u>industrial employment</u> floorspace in the SIL, <u>or</u> LSIS or BEA location, <u>unless by agreement where capacity will be consolidated elsewhere in London in line with London Plan Policy E7</u>;</p> <p>C. Provide uses in line with Policy 26 - Safeguarding and Managing Strategic Industrial Land (SIL) <u>and</u> Policy 27 - Safeguarding and Managing Change in Locally Significant Industrial Sites (LSIS), or Policy 28 - Safeguarding and Managing Change in Borough Employment Areas, as appropriate;</p> <p>D. Provide upgraded facilities, demonstrated to be fit for purpose;</p> <p>E. Take account of the particular character and visions <u>for</u> of the area as identified in Appendix II Appendix 2 'Employment Land Character' & Visions and evidence base, with further guidance in the Industrial Intensification SPD;</p>	Enabling an element of non-employment uses to come forward in parallel will offer greater certainty and improve deliverability of later phases of development.

				<p>F. Are delivered in partnership and agreement by the Council and other stakeholders including the GLA;</p> <p>G. Undertake a two-stage identification process: i. Firstly, Sub Areas of Intensification and Consolidation; and ii. Secondly, Sub Areas of Potential Change;</p> <p>H. Deliver intensification and consolidation of sub areas; providing <u>industrial employment</u> space ahead of, <u>or in parallel with any initial enabling phase of any other</u> development;</p> <p>I. Are supported by a Viability and Delivery Plan;</p> <p>J. Set out how existing businesses will be retained through a Retention and Relocation Strategy; and</p> <p>K. Are supported by a Servicing Strategy</p>	
PSPC007	9	35	86	<p>Policy 35 - Railway Arches New development in the borough's railway arches, where it is not in an identified SIL, LSIS or BEA, will be encouraged by:</p> <p>A. Supporting current and future B2, B8, Class E, <u>and drinking establishment</u> uses especially with proximity to stations, in Town Centres or as part of wider regeneration schemes;</p> <p>B. Promoting improvements to the appearance of railway arches through upgrades, active frontages and improvements to public realm;</p> <p>C. Supporting development that does not have adverse impact on the railway line;</p> <p>D. Ensuring development does not obstruct the public highway and pedestrian public realm; and</p>	

					E. Ensuring new development adheres adopt suitable design mitigations <u>in line with Policy 59 - Amenity</u> .	
PSPC008	9		9.51	86	9.51 Waltham Forest has an ample supply of underused and vacant railway arches, providing opportunities for active use. Due to their size, scale and location, many of the boroughs railway arches are capable of providing suitable and <u>low-cost affordable</u> locations for employment activities including office, research and development, and light industrial (Class E Part G i,ii,iii), General Industrial (B2) and Storage and Distribution (B8) needs.	For better clarity and interpretation.
PSPC009	9		9.52	87	There is opportunity to widen the type of uses within in the borough's railway arches to support wider commercial, business and service uses, falling in the rest of Class E, <u>and drinking establishments, including food provision</u> , especially around station hubs, town centres or as part of wider regeneration and renewal. This will help to boost the vitality and vibrancy of the area surrounding the railway arches and contribute to the diversity of town centres.	
PSPC010	9	32		83	Policy 32 - Workspaces The provision of workspaces will be supported where they: A. Are located in Strategic Industrial Locations (SIL), Locally Significant Industrial Sites (LSIS), Borough Employment Areas (BEA); Town Centres; Strategic Locations or as part of regeneration projects; B. Provide uses in line with Policy 26 - Safeguarding and Managing Strategic Industrial Land (SIL), Policy 27 - Safeguarding and Managing Change in Locally Significant Industrial Sites (LSIS), or Policy 28 - Safeguarding and Managing Change in Borough Employment Areas, as appropriate;	Providing flexibility. In some instances, it may not be appropriate to provide units beyond shell and core due to specialist fit out requirements of the likely end users.

					<p>C. Deliver high quality, well designed, flexible and adaptable spaces of different size and types for a range of uses and occupants;</p> <p>D. Can be demonstrated to be meeting the requirements of intended end users, <u>where identified</u> ;</p> <p>E. Provide a fit-out which is finished to a standard meeting the essential requirements of the intended end-user, <u>where such a user has been identified and fit-out is appropriate</u></p> <p>F. Provide affordable workspace in line with Policy 33.</p>	
PSPC011	8	19		64	<p>Policy 19 - Small Sites Proposals for the development of <u>well-designed new homes on</u> small sites for new homes will <u>generally</u> be supported. <u>In particular, proposals should be supported where they:</u> where they:</p> <p>A. Seek to infill, intensify and re-model areas of existing housing;</p> <p>B. Encourage innovative approaches to housing delivery;</p> <p>C. Support residential intensification within 800 metres of a designated centre with good public transport accessibility;</p> <p><u>D. Are identified on the Brownfield Land Register.</u></p>	To clarify approach.
PSPC012	10	36(F)		91	<p>Requiring any scheme over 100 units or above 10,000 sqm involving mixed use/commercial space to contribute to cultural enhancement projects in local areas in accordance with the Cultural Strategy</p> <p><u>Requiring new residential and commercial proposals over 100 units or above 10,000 sqm delivered as single or mixed-use development to contribute to cultural enhancement projects as may be required in accordance</u></p>	For better clarity and interpretation

					<u>with the Waltham Forest Cultural Strategy. In seeking developer contributions, viability considerations will be considered in accordance with Policy 3 (F) and further guidance included in the Development Contributions SPD.</u>	
PSPC013	10	38(A)		95	<p>Development in the Blackhorse Creative Enterprise Zone (as defined in the Map – Figure 10.3) is expected to:</p> <p>A. Delivery of affordable workspace in line with Policy 32 – Workspaces and Policy 33 – Affordable Workspace;</p> <p><u>Development in the Blackhorse Creative Enterprise Zone (as defined in the Map - Figure 10.3) will be expected to:</u></p> <p><u>A. Support the delivery of affordable workspace in line with Policy 32 - Workspaces and Policy 33 – Affordable Workspaces. In seeking developer contributions, viability considerations will be considered in accordance with Policy 3 (F) and further guidance included in the Development Contributions SPD.</u></p>	For better clarity and interpretation.
PSPC014	10	38 (C)		95	<p>Explore the opportunity to use temporary vacant builds and sites for meanwhile affordable workspace or cultural uses;</p> <p><u>Explore the opportunity to use temporary vacant builds and sites for meanwhile uses, creative workspaces, and other cultural uses;</u></p>	For better clarity and interpretation.
PSPC015	20	96	20.27	218	<u>This Plan is supported by a Whole Plan Viability Study. Planning Policy Guidance mentions that where up-to-date policies have set out the contributions expected from development, planning applications that fully comply with them should be assumed to be viable and it is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage.</u>	For better clarity and interpretation.

					Following the outcomes of this consultation and endorsement of the overall spatial strategy and policy direction, the Borough will undertake a comprehensive Economic Viability Study to assess the cumulative impact of the proposed planning policies and requirements, in line with the requirements of the National Planning Policy Framework (NPPF) and the Local Housing Delivery Group guidance 'Viability Testing Local Plans'. In order for this plan and the policies therein to be found sound, it must be demonstrated that the policies and planning requirements as set out in the plan do not undermine the overall deliverability of the Plan. This will include sensitivity testing both with regard to the wider market uncertainty as well as the flexibility of the proposed policies.							
PSPC016	20		20.08	214	With regard to improvements in transport infrastructure, funding opportunities include: <ul style="list-style-type: none"> • Local Implementation Plan (LIP)/Streetspace funding • Transport for London (TfL) Growth Fund • TfL Step Free Programme • TfL Liveable Neighbourhoods fund • Department for Transport (DfT) Access for All Programme • Low Emissions Neighbourhood funding • Developer contributions 	For better clarity and interpretation						
PSPC017	APPX 5		Table 5.11	277	Addition of: <table border="1" data-bbox="741 1102 1413 1166"> <thead> <tr> <th>Policy</th> <th>Monitoring Indicator</th> <th>Target (if applicable)</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Policy	Monitoring Indicator	Target (if applicable)				To ensure biodiversity impacts are appropriately monitored
Policy	Monitoring Indicator	Target (if applicable)										

					<p><u>Policy 81 – Biodiversity and Geodiversity</u></p> <p><u>Units of BNG secured against biodiversity units lost</u></p> <p><u>The total area of SINCs</u></p> <p><u>The percentage of SINCs in positive management and in 'favourable condition'</u></p>								
PSPC018	APPX 5		Table 5.1	269	<p>Addition of:</p> <table border="1"> <thead> <tr> <th>Policy</th> <th>Monitoring Indicator</th> <th>Target (if applicable)</th> </tr> </thead> <tbody> <tr> <td>Policy 3 – Infrastructure for Growth</td> <td> <p><u>Average Total QOF points per practice (Quality and Outcomes Framework (QOF), NHS Digital)</u></p> <p><u>% who have a positive experience of their GP practice</u></p> </td> <td></td> </tr> </tbody> </table>	Policy	Monitoring Indicator	Target (if applicable)	Policy 3 – Infrastructure for Growth	<p><u>Average Total QOF points per practice (Quality and Outcomes Framework (QOF), NHS Digital)</u></p> <p><u>% who have a positive experience of their GP practice</u></p>			
Policy	Monitoring Indicator	Target (if applicable)											
Policy 3 – Infrastructure for Growth	<p><u>Average Total QOF points per practice (Quality and Outcomes Framework (QOF), NHS Digital)</u></p> <p><u>% who have a positive experience of their GP practice</u></p>												

PSPC019	APPX3			249	<p>Updated figure 3.2 to reflect:</p> <p>Addition of all sites previously identified BEAs except: Hatherley Mews, East London Office Centre, and E10 Business Centre</p> <p>Amendment of the proposed Howard Road LSIS to exclude the part of the site which falls within lawful retail use, and exclusion of parts of Sutherland Road LSIS to reflect planning permissions for non-industrial uses which are being implemented.</p>	Reflecting changes to the acceptable uses in BEAs, to address conformity issues highlighted by the GLA, and to ensure that the plan strategy for protecting and delivering additional industrial land is not undermined by allowing non-industrial uses to replace industrial and related uses on previously designated BEAs.
PSPC020	APPX3			254	<p>Updated figure 3.7 to reflect:</p> <p>Deletion of all BEAs except: Hatherley Mews, East London Office Centre, and E10 Business Centre</p>	Reflecting changes to the acceptable uses in BEAs, to address conformity issues highlighted by the GLA, and to ensure that the plan strategy for protecting and delivering additional industrial land is not undermined by allowing non-industrial uses to replace industrial and related uses on previously designated BEAs.
PSC021	VARIOUS	VARIOUS	VARIOUS		Update Local Plan to change all references to “Intend to Publish Version or Draft London Plan” to The London Plan (2021)	Reflecting the fact that during the preparation of the LP1 Document the London Plan went from its draft to adopted version incorporating proposed amendments arising from the Mayors response to the Secretary of State’s directions.