Policy Name:	Green Infrastructure and the Natural Environment						
Assumptions:	None.						
SA Objective	**Key Sustainability Issues**	**Description of Impact (Including Effects on Receptor and Effects on Key Sustainability Issues)**	**Direct/ Indirect/ Cumulative**	**Duration (short, medium, long term)**	**Permanent/ Temporary Irreversible/ Reversible**	**Spatial Extent / Magnitude**	**Significance**
SA1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	As the population continues to increase so does the demand for housing, infrastructure and facilities. The population density within the borough exceeds both the London and the national averages. There is a need to create high quality places to live, work and recreate that are mixed and well-balanced in terms of tenure and income. Promote high quality housing with a range of tenures to reduce health issues which arise from poor quality accommodation. There is a disparity between the cost of housing and the amount that people are able to borrow to purchase a home, which means that many people are unable to access the property market. There is a shortfall in the provision of affordable housing to meet the requirements of those in housing need. 28% of households are unsuitably housed; there is a potential shortfall in the provision of family accommodation and there is overcrowding, primarily in the private rental sector. Homelessness is expected to increase. Need to offer greater quality, flexibility and choice to those who rent. There is a need to increase the supply of well-designed housing of all tenures. Need to introduce more flexible approaches for affordable housing contributions to encourage open market and mixed tenure specialist older people's housing.	The policy neither supports nor detracts from the achievement of the SA objective. Therefore a neutral effect is predicted.	N/A	N/A	N/A	N/A	Neutral
SA2. Reduce crime and the fear of crime	Increases in racist and religious hate crimes. The percentage of residents that are worried about crime in the borough remains higher than the London average. Need to provide safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life. Need to develop an approach to tackling crime, improving liveability and reducing anti-social behaviour.	The policy neither supports nor detracts from the achievement of the SA objective. Therefore a neutral effect is predicted.	N/A	N/A	N/A	N/A	Neutral
SA3. Improve standard of health and wellbeing of those who live and work in the Borough	Currently a large proportion of the population are aged over 50 and this is projected to rise over the next 20 years (+26% rise by 2021). Improve life expectancies through promoting healthy lifestyles for all ages. Need to ensure adequate access to green spaces and recreational facilities to promote active and healthy lifestyles. Need to increase recognition of the growing evidence of a relationship between physical and mental health. Need to ensure that hospitals have fit for purpose facilities (i.e. less converted houses) that meet the needs of patients. Need to increase levels of active travel throughout the borough in order to increase physical activity levels and tackle poor air quality.	The implementation of this policy has potential to cause a minor, indirect positive effect on this SA objective. Whilst it does not explicitly deal with standard of health or wellbeing, the protection and expanded provision of green space including planting of trees could help to ensure all have access to green space. This could help to improve both physical and mental health of those living and working in the Borough, who use the Green Belt, Metropolitan Open Land or green spaces. For this reason, a minor positive impact has been recorded for this SA objective.	Indirect	Medium	Permanent/ Reversible	Local/ Medium	Minor Positive
SA4. Improve community cohesion and reduce inequalities through the provision of community facilities to meet local cultural, educational, recreational and social needs	Inequalities in health and life expectancy between ethnic groups. Disparities between wards, particularly between the north and south of the borough. Need to provide inclusive services; promote equal opportunities; oppose discrimination, intolerance and disadvantage through reducing inequalities and promoting community cohesion. Help to support development of successful neighbourhoods. There is a need to create high quality places to live, work and recreate that are mixed and well-balanced in terms of tenure and income. Adequate support and facilities for older residents, including independent living, has been noted in particular to be needed. Need to build on borough's arts, culture and sport strengths across the borough's diverse and changing population. Need to reduce the number of older people who feel socially isolated, by getting them actively participating in community life. Currently a large proportion of the population are aged over 50 and this is projected to rise over the next 20 years (+26% rise by 2021). Need to ensure that growth supports the delivery of vital infrastructure and new facilities across the borough. Help to support development of successful neighbourhoods. Need to ensure that all residents have access to training and skills development to enable them to access and progress into high quality employment.	The implementation of this policy has potential to cause a minor positive effect on this SA objective. By ensuring the provision of high quality green space is maintained, the recreational needs of those living and/or working within the borough are more likely to be met. However, this policy will not address community cohesion within the Borough or the provision of cultural or education needs. Therefore, a minor positive effect has been recorded for this SA objective.	Direct	Long	Permanent/ Reversible	Local/ Medium	Minor Positive
SA5. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system, reducing car use for all journey lengths	Continual growth in car ownership will contribute to further air pollution, and associated impacts on climate, human health and biodiversity. Need to work towards improving air quality and reducing noise impacts from transport. There is a need to make public transport more accessible in some areas of the borough. There is a need to promote walking and cycling (building on Enjoy Waltham Forest ("Mini Holland") programmes) for local journeys in place of travel by private car. There should also be a focus on promoting public transport use instead of cars for medium and longer journeys. There is a need to reduce car parking spaces in order to discourage private car use and improve air quality. One in five journeys each weekday morning and afternoon involves trips to school, even though most journeys to schools are under a mile. There is a need to reduce school journeys by reducing Drop Off/Pick Up arrangements for new school developments, and encouraging sustainable, active travel amongst school pupils. As the population grows, so does the need to change current infrastructure to meet the demands of all residents whilst making it future proof. Need to ensure that growth supports the delivery of vital infrastructure and new facilities across the borough. Need to provide public transport capacity and safeguard land for transport. Help to enhance London's transport connectivity. Improvements to road safety are needed to reduce casualties. Need to make cycle parking safe and easy to use. There is a need to provide electric vehicle infrastructure, such as charging points.	This policy has the potential for a minor positive effect on this SA objective. Through the improvement of local pedestrian and cycle routes through Green Belt and MOL areas, sustainable transport options throughout the Borough to local facilities and services may be improved. For this reason, a minor positive impact has been recorded for this SA objective.	Direct	Medium	Permanent/ Reversible	Local/ Low	Minor Positive
SA6. Prevent production of waste, improve resource efficiency and increase recycling and recovery	The amount of waste produced is reducing but still exceeds both the London and national average. The London Plan encourages greater self-sufficiency for waste management in London and sustainable transportation of waste. Recycling is increasing but still falls short of government targets. Need to ensure that growth supports the delivery of vital infrastructure and new facilities across the borough. Need to minimise the impact of municipal waste management on the borough's environment. Need to reduce the carbon footprint of municipal waste. Need to ensure that all waste is managed in the most environmentally friendly way.	The policy neither supports nor detracts from the achievement of the SA objective. Therefore a neutral effect is predicted.	N/A	N/A	N/A	N/A	Neutral
SA7. Reduce greenhouse gas emissions and promote low carbon growth	Greenhouse gas emissions need to be stabilised and reduced over time. Help promote low carbon heat network. Need to identify opportunities for growth of the low carbon economy in the Upper Lee Valley. There is a need to provide electric vehicle infrastructure, such as charging points.	The policy promotes urban greening which as stated in the supporting policy text will deliver benefits in supporting biodiversity and mitigating against the impacts of climate change and pollution. This could contribute to the achievement of the SA objective, therefore a potential indirect positive effect is predicted.	Indirect	Medium/ Long	Permanent/ Irreversible	Regional/ Low	Minor Positive
SA8. Conserve energy	There is a need to continue to promote the construction of energy efficient buildings, and to support the installation of renewable and low or zero carbon technology.	The policy neither supports nor detracts from the achievement of the SA objective. Therefore a neutral effect is predicted.	N/A	N/A	N/A	N/A	Neutral
SA9. Improve air quality	Continual growth in car ownership will contribute further air pollution. Reliance on the petrol or diesel-fuelled private car as the main mode of transport. Air pollution from the strategic road network is an issue across the borough and NO2 emissions are remaining constant, not decreasing as predicted. Increasing use of biofuels (biodiesel and biomass) for heating schemes will cause further air quality issues. Need to help reduce pollution from road vehicles, buildings, industry and construction. Need to improve efficacy of measures within the AQMA. There is a need to provide electric vehicle infrastructure, such as charging points.	This policy has the potential for an indirect minor positive effect on this SA objective. This policy aims to keep existing green spaces, as well as developing a green infrastructure network. This will in turn provide more sustainable methods of transport for those travelling within and through the Borough. This could enhance air quality due to an increase in vegetation as well as an increase in sustainable transport methods, such as walking or cycling. However, the magnitude of this impact is expected to be low, as only new developments must consider this.	Indirect	Medium	Temporary/ Reversible	Regional/ Low	Minor Positive
SA10. Improve water quality in rivers and groundwater and ensure the efficient use of water resources	Diffuse urban water pollution exists in local rivers and water bodies. There should be no deterioration in the health and quality of existing water bodies and development should improve the status of waterbodies to achieve 'Good Overall Status' in accordance with the Water Framework Directive', such as through installing rain planters and reed beds. Increasing population will put strain on water resources. New development will need to allow for an 8 metre buffer zone on both sides of a main river to allow access to the flood defences for maintenance or essential remedial work as well as promoting green and blue infrastructure links, water quality and human health. Potential impacts of the Local Plan policies and site allocations on groundwater need to be identified and addressed.	The policy neither supports nor detracts from the achievement of the SA objective. Therefore a neutral effect is predicted.	N/A	N/A	N/A	N/A	Neutral
SA 11. Reduce the risk of flooding and improve resilience to climate change	High number of properties at risk at flooding and there is a need to promote the construction of new flood resistance and resilience measures for existing and future properties to ensure they are resilient to the future effect of climate change and protected against future flood risk. Natural flood management techniques should be promoted. New development will need to incorporate SUDS to sustainably reduce flood risk and there is a need to encourage the retrofitting of existing developments with SUD systems. Ensure that existing flood defences are maintained responsibly by the riparian owner for remedial works to be carried out where necessary. Need to promote the use of new technologies and innovation in flood mitigation measures. There will be an increasing need to plan for and implement/facilitate climate change adaptation, in respect of rising temperatures, water scarcity and extreme weather events, particularly heavy rainfall/flooding. There is a need to plan and prepare for the expected impacts of unavoidable climate change by developing adaptation	The policy neither supports nor detracts from the achievement of the SA objective. Therefore a neutral effect is predicted.	N/A	N/A	N/A	N/A	Neutral
SA12. Ensure the efficient use of land and buildings and protect soil quality and geological resources	There is finite availability of previously developed land for development; this may result in the use of greenfield land in the future. There is a need to protect soils and the important ecosystem services they provide – particularly during construction and development. Need to protect designated geological sites.	This policy has the potential for an indirect minor positive effect on this SA objective. By encouraging the redevelopment of brownfield sites, greenfield land may be protected and land used in the most efficient ways possible. Geological sites are not protected by this policy. For this reason, a minor positive effect has been recorded.	Indirect	Medium	Permanent/ Reversible	Local/ Low	Minor Positive
SA13. Conserve and enhance biodiversity and the natural environment, improving resilience to climate change	Support is needed to achieve local BAP targets. Need to promote effective land-management to support, protect and enhance biodiversity. Increases in population will cause a demand for more development, where there is a potential for loss of valuable habitats which have yet to be designated for nature conservation as a direct result. Consider and plan for the impacts of climate change on species and habitats. There is a need to help encourage people to engage with the ownership, design, management, maintenance and use of their environment as part of their own vision for their neighbourhood. Need to recognise the wider benefits of ecosystem services and minimise impacts on biodiversity. Increase awareness that green infrastructure and resilient ecological networks play an important role in aiding climate change adaptation and resilience.	This policy has potential to protect biodiversity sites and the local environment, as existing spaces and biodiversity levels are encouraged to be both maintained and improved by any future development. Moreover, new green spaces are encouraged which are of high quality, and where not possible, "financial contributions will be sought.". A minor positive impact has been recorded for this SA objective, as this policy does not address resilience to climate change.	Direct	Long	Temporary/ Reversible	Local/ Medium	Minor Positive
SA14. Protect the ecological integrity of SSSI and Natura 2000 sites	Large areas of the SSSI sites are considered to be in either unfavourable with no change or to be in an unfavourable and declining condition; SSSIs and European sites within the borough are under threat from poor air quality, recreational pressure and urban effects (including issues with litter). Need to protect and enhance the wildlife and habitats in Waltham Forest, in particular those of international, national and regional importance.	The HRA of the Local Plan will determine whether this Local Plan policy will result in an adverse effect on Natura 2000 sites. This policy could potentially decrease recreational pressures to European sites, however, it is screened into the HRA because it also encourages connectivity of green infrastructure which could improve access to and present a risk of damage to European Sites. The HRA has not yet been concluded in respect of potential recreational effects. This assessment will be updated when the HRA is concluded.	N/A	N/A	N/A	N/A	Uncertain
SA15. Maintain and enhance the quality of the green belt and open space areas	Large areas of open space are Metropolitan Green Belt. There is a need to protect these areas of open space from development pressure. There is a need to protect open space of varying types, which is used heavily by residents in the borough. For example, allotment space.	This policy directly refers to the Green Belt and Metropolitan Open Land (MOL), detailing the criteria which development on this land must meet. However, this policy does not entirely rule out future development within the Green Belt and instead relies on "national policy and the London Plan" to prevent development within the area. Therefore an uncertain effect is identified.	N/A	N/A	N/A	N/A	Uncertain
SA16. Maintain and improve local distinctiveness	Need to establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit. Need to work towards conserving local character and history, by reflecting the identity of local surroundings and materials. This should not prevent or discourage appropriate innovation.	The implementation of this policy could potentially aid in maintaining local distinctiveness. The existing Green Belt, Metropolitan Open Land (MOL), green space and green infrastructure network could all be protected from development. This may, in turn, help to conserve the current sense of place within Waltham Forest. Hence, a minor positive effect has been recorded for this SA objective.	Direct	Long	Temporary/ Reversible	Local/ High	Minor Positive
SA17. Conserve and enhance the historic built environment	A number of listed buildings are identified as being in poor condition and are have been included on Historic England's Heritage at Risk Register. Opportunities exist to improve the condition of some listed buildings through development. The borough contains 20 Archaeological Priority Areas where there is significant known archaeological interest or potential for new discoveries. Ensure that the Conservation Areas, Heritage Assets (including archaeology) and features are preserved or enhanced. New developments should respect the urban and historic context, improve townscape and leave a positive architectural legacy. Impacts of future development on the local historic environment need to be considered. Heritage assets should be managed to sustain their significance. Ensure that everyone is able to participate in understanding and sustaining their local historic environment. Development could encroach on Conservation Areas and subsequently negatively affect townscape and heritage assets.	The policy neither supports nor detracts from the achievement of the SA objective. Therefore a neutral effect is predicted.	N/A	N/A	N/A	N/A	Neutral
SA18. Maintain and enhance the vitality and viability of the Borough's town centres	Further action is needed in order to support and promote retail, business, cultural, leisure and residential investment in town centres.	The policy neither supports nor detracts from the achievement of the SA objective. Therefore a neutral effect is predicted.	N/A	N/A	N/A	N/A	Neutral
SA19. Improve the local economy by enabling employment developments in appropriate places	Action is needed to provide more support for business start-ups because only 71% of new businesses in the borough survive more than 2 years. Lower than average salaries could affect the borough's ability to attract inward investment. Continue to support the Upper Lee Valley Development Opportunity Area and celebrate its industrial heritage. There are likely to be ongoing pressures on industrial sites, need to maintain industrial uses and promote strong local base of small businesses. Need to provide additional workspaces and promote denser, mixed use development with no net loss of business floor space.	The policy neither supports nor detracts from the achievement of the SA objective. Therefore a neutral effect is predicted.	N/A	N/A	N/A	N/A	Neutral
SA20. Maintain stable levels of employment in the Borough	Skills development in growth areas is also needed both for those who are currently unemployed or underemployed. Encourage and promote flexible working arrangements for residents to support people when gaining skills and moving into employment. There are large inequalities in employment and skill levels between wards within the borough. Need to ensure that regeneration is inclusive. Ensure that ongoing business growth becomes a driver of productivity and fairer wages (e.g. encouraging the London Living Wage), in order to create an increase in the overall prosperity of the Waltham Forest borough. There is a need to create fair employment and good work for all. In work support is needed to ensure sustainment of jobs, professional development and progression into better paid, secure higher quality jobs. Need to promote employment, training programmes and sector based initiatives in the growth of skills to support creative and digital industries, construction and facilities management, retail and hospitality, and finance and business services.	The policy neither supports nor detracts from the achievement of the SA objective. Therefore a neutral effect is predicted.	N/A	N/A	N/A	N/A	Neutral

Mitigation

SA14: the HRA of the Local Plan will determine whether this policy, in combination with other policies within the Local Plan, could result in adverse effects on Natura 2000 sites. To be updated once HRA is concluded.
SA15: The potential for a significant negative effect on SA 15 could arise due to a lack of clear criteria setting out which circumstances development could be permitted under; this could result in the permanent loss of greenfield and Green Belt land, which could not be mitigated. Currently, the London Plan, which this policy appears to rely on for deciding development, will allow it if the development fits the Local Plan policies. This could lead to confusion as well as the development of areas which are not best suited, or could which be irreversibly changed. Clearly stating the other policies to which this policy refers would add clarity to the policy and could prevent the permanent loss of greenfield and Green Belt land.

Enhancements

None.