



SHAPING THE BOROUGH

DRAFT LOCAL PLAN 2020 – 2035

PUBLIC CONSULTATION
CONSULTATION DRAFT JULY 2019

Translation

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Translation

INTERPRETING AND TRANSLATION ASSISTANCE

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<p>Dokumentit apo përmbledhja e tij mund të sigurohen në gjuhë tjera, shtyp të madh, Braille, audiokasetë apo i përkthyer sipas kërkesës. Nëse ju keni nevojë për këto shërbime, ju lusim na kontaktoni në adresën e dhënë më poshtë.</p> <p>Albanian <input type="checkbox"/></p>	<p>આ અહેવાલ કે એનું સંક્ષેપ બીજી ભાષાઓમાં, મોટા અક્ષરોમાં, બ્રેઇલમાં, ઓડિયો ટેપ પર અથવા ભાષાંતર સેવા દ્વારા ઉપલબ્ધ થઈ શકે છે. જો તમને આ સેવાની જરૂર લાગે, તો કૃપા કરીને અમને નીચેના સરનામે સંપર્ક કરો.</p> <p>Gujarati <input type="checkbox"/></p>
<p>يمكن توفير هذه الوثيقة أو ملخصها بلغات أخرى أو بالطبعة الكبيرة أو بلغة بريل أو على الشريط. ويمكن توفير خدمة ترجمة عند الطلب. وإذا احتجت منالاً من هذه الخدمات الرجاء الاتصال معنا على العنوان المذكور أدناه.</p> <p>Arabic <input type="checkbox"/></p>	<p>यह पत्र या इसका संक्षेप अन्य भाषाओं में, बड़े अक्षरों में या सुनने वाली टेप पर माँग कर लिया जा सकता है, और अन्य भाषाओं में अनुवाद की सुविधा भी मिल सकती है। यदि आपको इन सुविधाओं की ज़रूरत है तो कृपया निम्नलिखित पते पर हमारे साथ संपर्क करें।</p> <p>Hindi <input type="checkbox"/></p>
<p>অনুরোধক্রমে এই ডকুমেন্ট অথবা এর সারসর্ম অন্যান্য ভাষায়, বড় ছাপার অক্ষরে, ব্রেল বা অডিওর উপর, অডিও টেপ বা বাজিয়ে শোনার কেসেটে অথবা অনুবাদ করে দেয়ার ব্যবস্থা করা যাবে। আপনার যদি এসব সেবাসমূহের প্রয়োজন হয়, তাহলে অনুগ্রহ করে আমাদের সাথে নীচের ঠিকানায় যোগাযোগ করুন।</p> <p>Bengali <input type="checkbox"/></p>	<p>ਇਹ ਪਰਚਾ ਜਾਂ ਇਹਦਾ ਸੁਲਾਸਾ ਹੋਰ ਭਾਸ਼ਾਵਾਂ ਵਿਚ, ਵੱਡੇ ਅੱਖਰਾਂ ਵਿਚ, ਜਾਂ ਸੁਣਨ ਵਾਲੀ ਟੇਪ 'ਤੇ ਮੰਗ ਕੇ ਲਿਆ ਜਾ ਸਕਦਾ ਹੈ, ਅਤੇ ਹੋਰ ਭਾਸ਼ਾਵਾਂ ਵਿਚ ਤਰਜਮਾ ਕਰਨ ਦੀ ਸਹੂਲਤ ਵੀ ਮਿਲ ਸਕਦੀ ਹੈ। ਜੇ ਇਹਨਾਂ ਸਹੂਲਤਾਂ ਦੀ ਤੁਹਾਨੂੰ ਲੋੜ ਹੈ, ਤਾਂ ਕਿਰਪਾ ਕਰਕੇ ਹੇਠ ਲਿਖੇ ਪਤੇ 'ਤੇ ਸਾਡੇ ਨਾਲ ਸੰਪਰਕ ਕਰੋ।</p> <p>Punjabi <input type="checkbox"/></p>
<p>我們可以按照您的要求向您提供此文件或其摘要的母語譯本、大字印刷版本、盲文版本、錄音帶或者提供其他翻譯服務。如果您需要以上服務，請通過以下的地址與我們取得聯繫。</p> <p>Chinese <input type="checkbox"/></p>	<p>İstekte bulunursanız, bu broşürü ya da broşürün özetinin Türkçesini size gönderebiliriz. Ayrıca broşürün iri harfli baskısı, görme engelliler için parmak ucuyla okunabilen Braille alfabesiyle yazılmış kabartma şekli ve ses kaseti de olup istek üzerine broşürün özetini sözlü olarak da size Türkçe okuyabiliriz. Bu hizmetlerden yararlanmak için aşağıda yazılı adresten bize ulaşabilirsiniz.</p> <p>Turkish <input type="checkbox"/></p>
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<p>Name _____ Address _____ _____ _____ Telephone No _____</p>	<p>CONTACT: Planning Policy London Borough of Waltham Forest Magistrates court, Waltham Forest Town Hall Forest Road, Walthamstow, London, E17 4JF Telephone 020 8496 3000 Email: planning.policy@walthamforest.gov.uk Web site: www.walthamforest.gov.uk</p>

Foreword

Waltham Forest is a place where people want to live, raise a family and start a business. The Local Plan plays an important role in making these dreams a reality, while ensuring the unique character of the borough is protected and enhanced. Our priority as a Council is to plan for future growth, so that development makes a lasting and positive impact on communities and opens up new opportunities for our people. This links to our three overarching priorities as a Council:

- Safer cleaner streets
- Ensuring a decent roof over the heads of our residents
- Improving the life chances of all our residents

To do this effectively, we need to ensure we promote the right development in the right places at the right scale, creating attractive sustainable neighbourhoods as well as new economic opportunities. The draft policies in this Plan aim to address the needs of the local community over the next 15 years, including the delivery of new high quality, genuinely affordable homes, new jobs and employment space, thriving cultural neighbourhoods and town centres, infrastructure, preserving the environment and addressing climate change.

We are now consulting on the second stage of the new Local Plan. We want your views on the policies, visions and objectives in this document and whether they reflect your borough and the delivery of good growth. The Plan is built around five core, golden threads:

1. Increasing housing delivery. Creating liveable places.
2. Ensuring growth is sustainable and supported by infrastructure.
3. Building on the unique strengths of the borough and carrying forward its cultural legacy.
4. Promoting the economy to improve life chances for all residents, students and workers.
5. Ensuring land optimisation and driving investment.

We believe this Plan will help achieve that and hope that your comments will help us put the right policies in place to help build a better future for our residents and our communities.



Cllr Simon Miller - Portfolio Lead Member for Economic Growth and Housing Delivery

1 Introduction and Background

1.1 Waltham Forest is first ever Mayor's London Borough of Culture. This recognises the potential of the borough as a driver of transformational change in the capital. Like the rest of London we are changing and growing to meet the new challenges which come from population expansion, the housing crisis and the impacts of Brexit uncertainty. We believe that our unique heritage and cultural identity enables us to respond positively to the challenges that are identified in this draft Plan.

1.2 Waltham Forest Draft Local Plan (2020-2035) is the next stage in preparing a new Local Plan for the Borough. This Local Plan shapes and manages good growth, development and regeneration across the Borough for the next 15 years. It sets out how the Borough will meet the challenges of economic, environmental and social sustainability to ensure good growth and sustainable development.

1.3 Once adopted, the new Local Plan will replace the Core Strategy (2012), Development Management Policies Document (2013), Walthamstow Town Centre Area Action Plan (2014) and Blackhorse Lane Area Action Plan (2015), with a single Local Plan, supported by a series of Supplementary Planning Documents, Neighbourhood Plans (as may be prepared) masterplans, and planning briefs. This Plan will shape developments and guide neighbourhood plans and decisions on the location, amount and types of development the Borough requires to meet local needs and accommodate sustainable good growth.

1.4 Together with the London Plan and the North London Waste Plan (once they are adopted), this Plan will form the Statutory Development Plan under section 38 of the 2004 Planning and Compulsory Purchase Act.

Purpose of this document

1.5 The publication of the draft Local Plan is an important stage in preparing the new Local Plan. The draft Local Plan carries forward and builds on the Direction of Travel consultation work undertaken in November-December 2017 and other new evidence or information. At the earlier round of consultation, key planning issues likely to face Waltham Forest in the next 15 years were identified and a set of policy directions were put forward as options.

1.6 This draft Plan sets out the preferred or chosen policy approach in addressing the issues identified. In particular, the most realistic and appropriate policy options have been considered in accordance with national and regional policy, which also align with the vision for the Borough. The draft Plan seeks to promote the sustainable growth of Waltham Forest.

1.7 Planning legislation requires Council's to carry out a Sustainability Appraisal as part of the plan making process. Accordingly, this draft Local Plan is supported by a sustainability appraisal. This document is also published on the Council's website. It appraises the draft Plan policies to inform the decision-making process by

highlighting the potential implications of pursuing the proposed strategy, plan policies and proposals. Where appropriate, it includes recommendations to reduce identified adverse effects and maximise beneficial effects.

1.8 The draft Local Plan is a consultation document under Regulation 18 of the Town and Country Planning (Local Development) (England) Regulations 2012. This provides the opportunity for anyone to comment on whether they agree with the proposed policy approach and, if they wish, to submit other comments for consideration. Comments submitted on this consultation will inform the final version of the Plan.

Have your say

1.9 We want your comments and views on this document and how we have approached the challenges and opportunities facing the Borough. We need to be sure that this Plan addresses these in a way which benefits the needs of those who live, study, work and visit Waltham Forest now and in the future.

1.10 There are a number of ways you can respond to this consultation. We would prefer to receive your comments via our online consultation portal at <http://walthamforest-consult.limehouse.co.uk>

1.11 If you do not have internet access, this document is available to read as a paper copy at the Town Hall and in all borough libraries. You can then complete the consultation response form and return to:

- Planning Policy Team, First Floor, The Magistrates, 1 Farnan Road, E17 4NX
- If you have any question, or experience any difficulties submitting your representations, please contact us by email planning.policy@walthamforest.gov.uk or on 0208 496 6748.

1.12 The consultation begins on **Monday 22 July** and ends **Monday 30 September 2019 at 5 pm**.

1.13 Responses received after the deadline can only be accepted in exceptional circumstances. If you use the Council's online consultation portal you will receive an automated message to confirm receipt of your response and you can also view all comments that have been made. Representations cannot be made anonymously, so please provide your full name and contact details. Please note that representations will be publicly available.

Sustainability Appraisal

1.14 Planning legislation requires the Council to carry out sustainability appraisal when preparing a new Local Plan. Its role is to promote sustainable development by assessing the extent to which an emerging plan, when judged against reasonable alternatives will help to achieve relevant environmental, economic and social objectives.

1.15 Sustainability Appraisal is a systematic process. It takes place in stages as the Local Plan goes through the process of preparation. At each stage there is an opportunity to comment on the Sustainability Appraisal Report. Further information on Sustainability Appraisal work is published on the Council's website.

1.16 Development Plan Documents are also subject to Appropriate Assessment (under the amended Habitats Regulations) to ensure proposals do not harm sites of international conservation value. Further information on Habitats Regulation Assessment (HRA) work is also published on the Council's website.

How to find out more

- Visit our website www.walthamforest.gov.uk
- Visit the consultation portal <http://walthamforest-consult.limehouse.co.uk>
- Visit us at a consultation event (details will be provided on the Council's website).
- View copies of this document at a local library in the Borough.

What happens next?

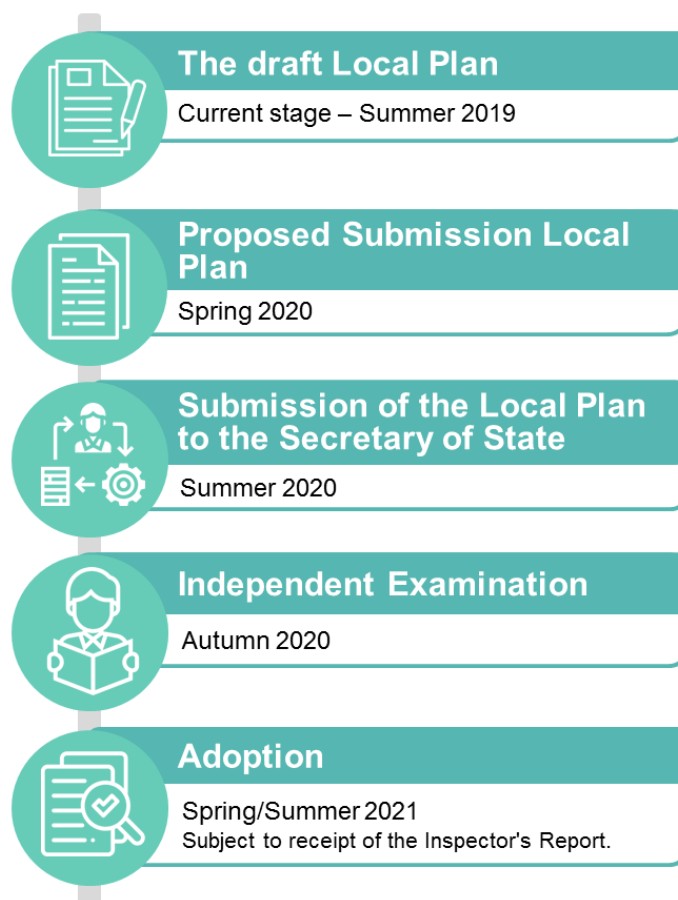
1.17 Once the consultation has closed the Council will consider the comments and views received. A consultation report will be published alongside the next stage in the Local Plan process (Regulation 19 – Proposed Submission). Subsequent stages of the Plan preparation process will be as follows:

Proposed Submission Plan - The draft Local Plan will be finalised as the 'Proposed Submission' version and published for statutory consultation (six weeks period). This will be your final chance to engage with the Plan before it is submitted Secretary of State for independent examination.

Submission - The Plan document will be submitted to the Secretary of State for independent examination. The Local Plan and supporting evidence documents including consultation reports will be submitted.

Independent Examination - The Secretary of State will appoint an Independent Person (Planning Inspector) to examine the Local Plan. The Local Plan will then be examined and the Inspector's Report sent to the Council.

Adoption - The Council formally adopts the new Local Plan.



The Local Plan's relationship with other policies and strategies

1.18 Waltham Forest's new Local Plan is taking a different approach. It will consist of a single overarching document, supported by Supplementary Planning Documents, masterplans and Planning Briefs. These supporting documents will set out specific policies and plans for strategic locations in the Borough, or on themed policies.

1.19 The policies in the new Local Plan will deliver the priorities for the Borough:

- To keep Waltham Forest clean and safe;
- Ensure everyone has a decent roof over their head;
- Improve residents' life chances.

1.20 The Local Plan will also align with other Council strategies including, but not exclusively:

- Creating Futures
- 2030 Vision
- Connected Communities
- Economic Growth Strategy
- Housing Strategy

- Culture Legacy Strategy
- Parks and Open Space Strategy

Creating Futures

1.21 This strategy sets out five guiding principles that are intended to shape the Council and everything it does covering:

- Our unique strengths - building on what is best about our borough
- Return on investment - always getting maximum value from our resources
- People focussed - providing 21st century services that meet people's needs
- New relationships - building deeper relationships with our partners and a new relationship with our community
- New ways of working - creating an agile Council that is more digitally driven and more commercially minded

1.22 2030 Vision

1.23 The Council is currently developing a 2030 vision through a combination of evidence gathering and forecasting, resident and stakeholder insight.

Connected Communities

1.24 In March 2019, Waltham Forest Council launched the Connecting Communities programme. This ambitious programme, funded by the Ministry for Housing, Communities and Local Government (MHCLG), aims to inspire the people of Waltham Forest to make a positive impact for those around them. The Council's vision for this is to unlock the collective power of Waltham Forest's people to build an integrated, supportive and safe community that feels like home for everyone. The programme includes establishing community networks in Leyton, Leytonstone, Chingford and Walthamstow to bring volunteers, community groups, local businesses and Council services together to agree local priorities and share resources.

Economic Growth Strategy

1.25 This sets out the Council's plans for investment, growth and regeneration to 2020 based around five themes.

- Business – Keep, seed and grow businesses in the borough with a targeted approach to specific sector, to ensure Waltham Forest's economy thrives and overall productivity increases.
- Town centres – support and promote retail, business, cultural, leisure and residential investment in our town centres that recognises their unique identities and invests in their future.
- Housing growth – build new homes creating great places to live and supporting the borough's vibrant local economy.

- Employment and skills – ensure that local people have the skills and ability to capture the opportunities of growth and to access high-quality employment in the borough and across London.
- Infrastructure – ensure that growth supports the delivery of vital infrastructure and new facilities across the borough.

1.26 Housing Strategy (2019-2024) – sets out the steps the Council will be taking directly to support the delivery of housing in the borough during the period 2019-2024. Key priorities are:

- Supporting growth and aspirations within the borough
- Tackling and preventing homelessness
- Ensuring decent, safe and healthy homes
- Think Family Think Housing Think Work: Inclusive and sustainable neighbourhoods

Culture Legacy

1.27 Following the launch of the London Borough of Culture 2019 programme, the Council is preparing a Culture Legacy Strategy.

Open Spaces Strategy

1.28 This is a review of the quality of parks and open spaces in the borough with the aim of providing a strategic vision for the provision, maintenance and management of open spaces to enhance the quality of life of the borough and its residents.

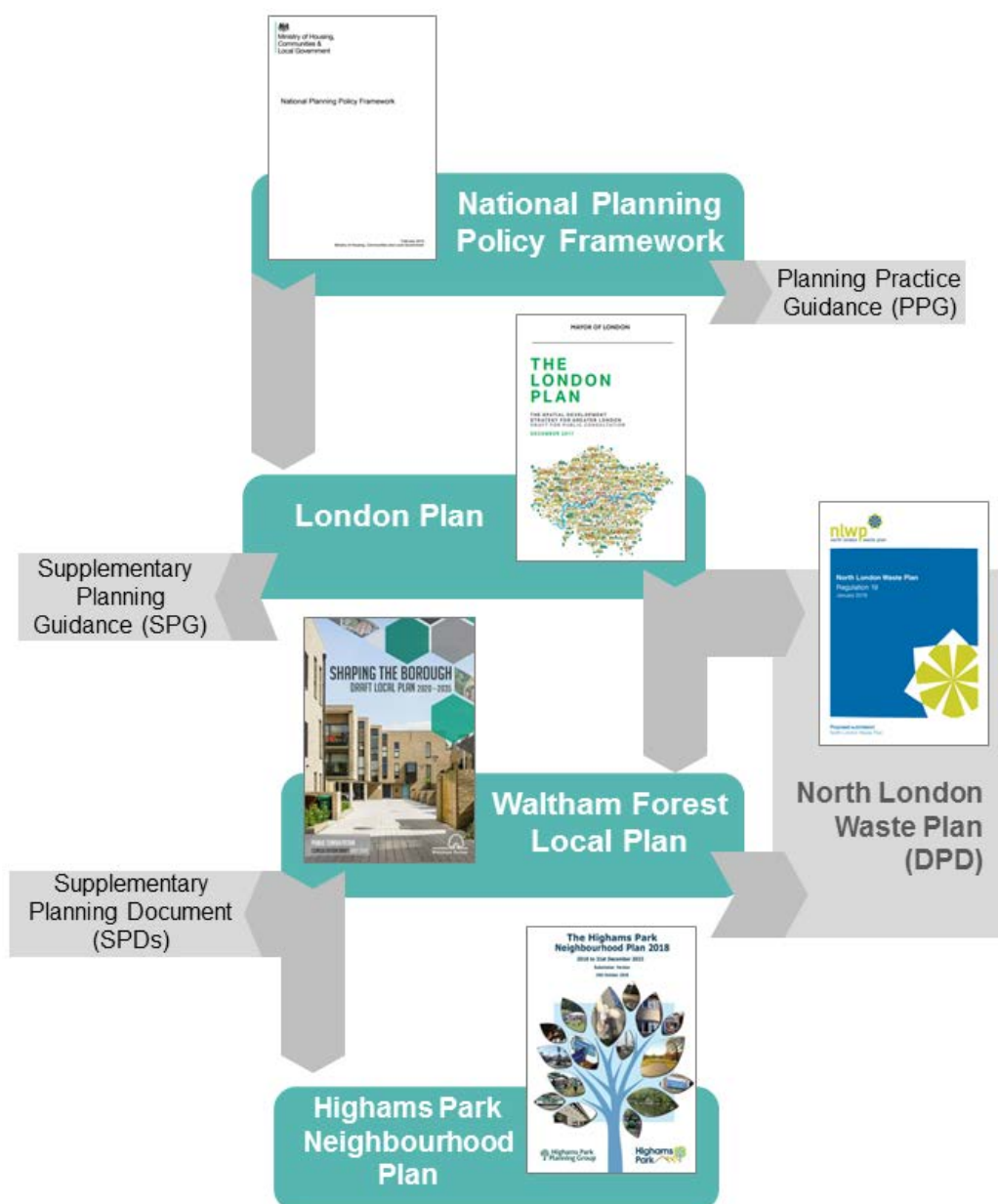
Duty to Cooperate

1.29 Under the 2011 Localism Act and the National Planning Policy Framework (NPPF), local planning authorities have a legal Duty to Cooperate with other local planning authorities and organisations to seek to address strategic planning matters that are driven by larger than local issues that are likely to have an impact beyond their immediate Local Plan area.

1.30 Accordingly, policies in the final plan document will also reflect the effective co-operation that has taken place with strategic partners such as the Mayor of London, Greater London Authority (GLA), Transport for London (TfL), Network Rail, London-Stansted-Cambridge Consortium (LSCC), neighbouring boroughs and councils, and the Clinical Commissioning Group (CCG) on strategic issues.

National Policy, the London Plan and Neighbourhood Plans

1.31 The new Local Plan must be consistent with the National Planning Policy Framework and its supporting Planning Practice Guidance. The Local Plan must also be in 'general conformity' with the London Plan, and where appropriate, take account of Supplementary Planning Guidance (SPG). The Mayor of London produces other strategies to sit alongside the London Plan and these are also taken account of in the new Local Plan. Where communities in the Borough produce Neighbourhood Plans, these will have to be in general conformity with the new Local Plan and once 'made' (adopted) will form part of the Statutory Development Plan.



2 Setting the Scene

Welcome to the Forest

2.1 Waltham Forest is located to the north east of the centre of London and will play an exciting part in the overall regeneration of the capital. The borough is an active participant in the UK Innovation Corridor, which along with the borough's role in the Mayor's Upper Lea Valley Opportunity Area has contextualised the regeneration opportunities being realised in the Blackhorse Lane Area of the borough.

2.2 The borough is relatively small at 3,880 ha in area. It stretches from the Queen Elizabeth Olympic Park in the south to Epping Forest in the north. On its western boundary are the reservoirs and marshes which mark its boundaries with the London Boroughs of Enfield, Hackney and Haringey and to the eastern edge the borough abounds London Borough of Redbridge, with the London Borough of Newham to the south and Epping Forest District Council and Essex County Council to the north. Its location gives the borough its unique character: vibrant and densely urban in the south to the quieter areas of lower density suburbs and green spaces in the north. Approximately 27% of the Borough is Green Belt or Metropolitan Open Land, concentrated primarily on the western aspect.

2.3 Waltham Forest is home to 275,500 residents ⁽¹⁾ and approximately 10,700 businesses. It is a rapidly growing borough. Over the last decade, the number of residents has increased 20%. The annual growth rate of 1.7% is higher than both the London average (1.3%) and UK average (0.8%). At the same time as experiencing a substantial increase in the number of residents, the borough is becoming increasingly diverse. Population growth in the borough has been largely driven by international migration.

2.4 Since 2012, the number of businesses in Waltham Forest has grown by 35%. The borough has benefited significantly from the economic growth taking place across London. The borough has created a network of distinctive town, neighbourhood centres and high streets that contribute to its individuality and its attractiveness to residents and businesses as well as vital local economic and cultural hubs.

2.5 It has a unique identity founded in its cultural heritage, with a burgeoning arts scene and creative industries; and designation as the first ever Mayor's London Borough of Culture. The borough is also one of London's greenest, with a network of green spaces and Epping Forest contributing to the urban vibrancy that makes Waltham Forest a special place to live, study work or visit.

1 2017 mid-year population estimates, Office for National Statistics

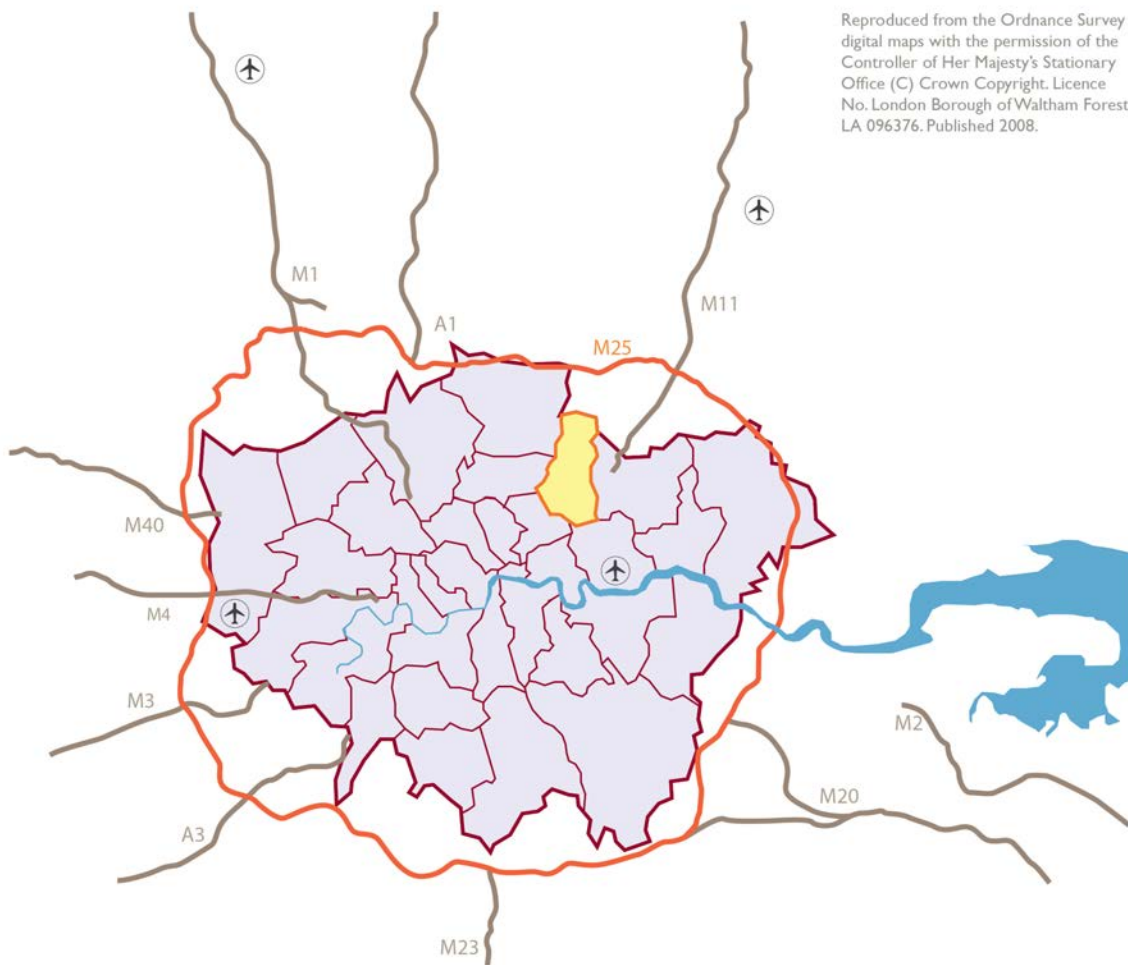
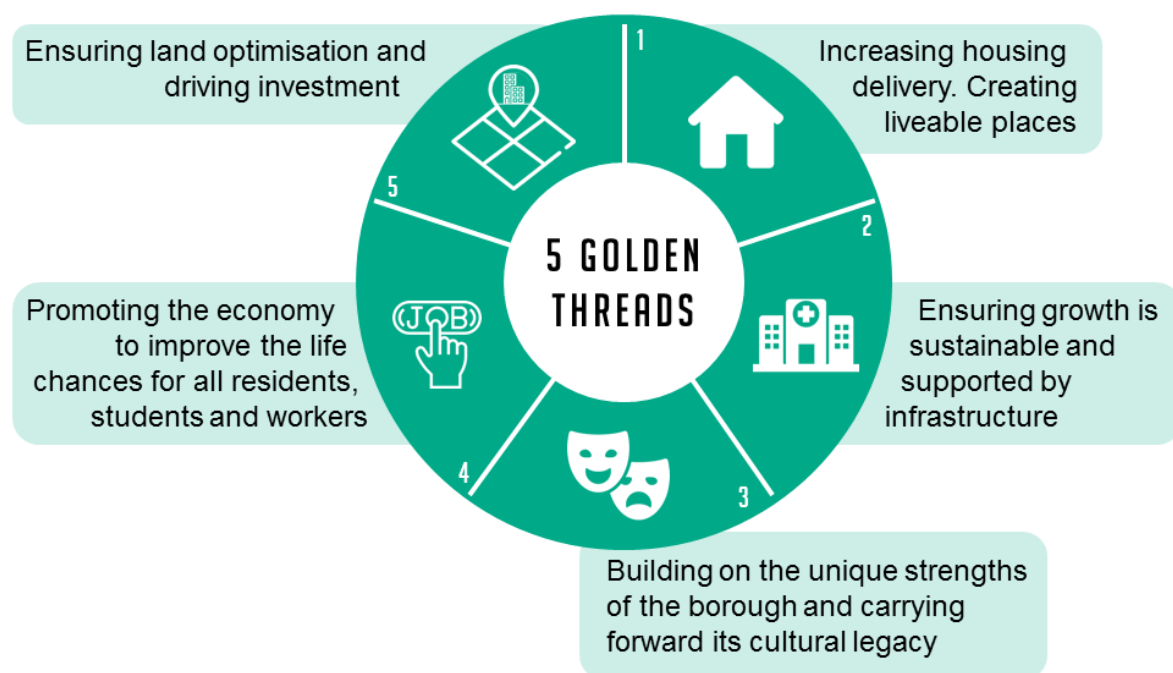


Figure 2.1

3 Vision and Strategic Objectives

3.1 The Local Plan sets out the strategic priorities for development of the borough over the next 15 years. There are five golden threads that shape the Local Plan; these will deliver the priorities set out in Council's Creating Futures corporate strategy. These are as follows and are all considered to have equal value.



Five Golden Threads

- Increasing housing delivery, creating liveable places
- Ensuring growth is sustainable and supported by infrastructure
- Building on the unique strengths of the borough and carrying forward its cultural legacy
- Ensuring land optimisation and driving investment
- Promoting the economy to improve the life chances for all residents, students and workers

Waltham Forest in 2035

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

Liveable Waltham Forest

Waltham Forest's vibrant network of distinctive and thriving town centres will be cultural community hubs, bringing the city to the suburbs and supporting creative, healthy and active lifestyles. Building on the success of Enjoy Waltham Forest, the Borough's extensive network of green spaces including forest, open space, Green flagged parks, neighbourhood and pocket parks and urban space will help to connect these centres to new liveable neighbourhoods by integrated walking and cycling routes and improved public transport. These liveable neighbourhoods will include a choice and mix of genuinely affordable new homes, which along with an increasing number of local jobs will realise the Plan's ambitions to make the Borough the model of new metropolitan cultural suburbs.

Growing a creative, diverse and resilient economy in Waltham Forest

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

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

Waltham Forest as a place of leisure

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

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

Strategic Objectives

These strategic objectives will deliver the vision for Waltham Forest 2035 by:

1. Ensure a significant increase in the supply, choice and mix of high quality new homes, in particular delivering genuinely affordable homes to enable and encourage residents to stay in the Borough and strengthen communities.
2. Grow, promote and diversify Waltham Forest's economy, including its dynamic, cultural, creative and digital sectors and its role in the Upper Lee Valley and wider UK Innovation Corridor, by both supporting and nurturing indigenous growth as well as attracting inward investment.
3. Improve life chances by improving job opportunities, upskilling residents and providing access to new skills and training opportunities locally and elsewhere, creating wealth in a successful metropolis.
4. Support Waltham Forest's network of thriving, safe and attractive town centres, maintaining the distinctive role of each and making them accessible to all.
5. Ensure timely, strategic and local infrastructure investment and delivery to support good sustainable growth for communities both now and in the future, through working with partners, investors, developers and providers.
6. Ensure that the Borough's cultural legacy and creative economy flourish and grow and investment is secured to improve life chances, quality of life and well-being for all.
7. Improve the health and wellbeing of all who live, study and work in Waltham Forest.
8. Improve active and sustainable transport choices across the Borough and beyond building on the success of the 'Enjoy Waltham Forest programme', encouraging wider integrated walking and cycling routes.
9. Promote exemplary standards of design in place-making and the highest quality of development.
10. Ensure Waltham Forest's network of cultural, inclusive and sustainable neighbourhoods are safe and diverse, celebrating their locally distinctive character and heritage.

11. Enhance the Borough's natural environment and develop a multifunctional network of green and blue infrastructure to deliver benefits for all, including increased public access.
12. Waltham Forest builds its resilience through addressing sustainability, efficient waste management and the effects of climate change through all stages in the development process.



4 Waltham Forest's Spatial Strategy

Introduction

4.1 Delivering the vision and spatial objectives as set out in the previous section will require a policy framework designed to deliver sustainable good growth. It will be necessary to ensure that doubling the rate of development compared to the previous plan is matched by the provision of opportunities for new employment, cultural quarters, accessible local services, supporting social infrastructure, good connectivity and a high-quality environment. A robust spatial strategy is required to deliver and manage growth to ensure that Waltham Forest continues to be recognised as a desirable place in which to live, study, work and do business. This section outlines the planned scale of growth and the locations in which growth will be encouraged and enabled and the overarching policies necessary to deliver sustainable good growth.

4.2 During the plan period, many parts of the Borough will experience physical changes to the built environment as a result of new development including a significant growth in housing, social infrastructure and employment provision. The built environment will also need to withstand and adapt to the effects of climate change and the need to provide for low carbon, low emission living and transport. Delivering high quality, sustainable and resilient places through good design and master planning will be essential to the achievement of the vision.

4.3 The proposed Spatial Strategy as covered in this section also sets out the locational priorities for development up to 2035. The strategy aims to ensure that growth is transformative in some parts of the borough, but also sustainably balanced not only reflecting the character areas of the Borough but also providing sufficient supporting social infrastructure building on the Borough's assets and opportunities. It has evolved from the earlier consultation on spatial choices as included in the Direction of Travel document published in November 2017.

4.4 Maintaining and enhancing the Borough's distinctive qualities and delivering high quality, sustainable, resilient places is vital to ensure the future prosperity of Waltham Forest. The proposed spatial strategy recognises existing development commitments and promotes a sustainable pattern of growth. The proposed spatial strategy is supported by a framework for delivery set out in subsequent chapters of this document intended to promote and secure growth through the delivery of housing and employment in the most sustainable locations, but also delivering required physical, social and community infrastructure.

Policy 1**Presumption in Favour of Sustainable Development**

At the heart of the Local Plan Strategy is a desire to deliver sustainable growth; growth that is not for its own sake, but growth that brings benefits for all of Waltham Forest's new as well as existing communities. A presumption in favour of sustainable development will be applied to all development management decisions.

When considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. Developments will be informed and shaped by the suite of policies that have been developed to ensure that development and growth are positive, work to the benefit of residents and businesses, and enhance the existing physical environment. The Council will achieve this by working proactively with applicants to jointly find solutions which mean that proposals can be approved wherever possible without delay, while at the same time securing development that improves the economic, social and environmental conditions in the Borough.

Planning permission will be granted where applications accord with the policies in this Plan (and, where relevant, with policies in the London Plan, adopted Neighbourhood Plans and Supplementary Planning Documents) when taken as a whole, unless other material considerations indicate otherwise.

4.5 At the heart the National Planning Policy Framework (NPPF) is a presumption in favour of sustainable development, which underpins both plan making and decision-taking. This Local Plan acknowledges this important national policy requirement. The planning system must contribute to the achievement of sustainable development. For plan-making this means that plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change. For decision-taking this means approving development proposals that accord with an up-to-date development plans without delay; or where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless there are clear reasons as set in the NPPF for refusing development.

Need for Development

4.6 National planning policy (NPPF) mentions that local plans must meet the objectively assessed need for homes and jobs in their area. The amount of growth necessary to ensure that Waltham Forest caters for the objectively assessed needs of current and future residents and businesses up to 2035 has been established from London Plan targets and through background evidence base studies. These studies, based on population and household projections, as well as economic forecasts, have been considered in determining the appropriate scale of development for the local plan.

Policy 2**Scale of Growth**

Over the Plan period (2020-2035) significant levels of housing, employment, office and retail development will be planned for and provided. This includes net increases of:

- A. 27,000 additional homes;
- B. 46,000 sqm employment purposes;
- C. Supporting physical, social and green infrastructure provision commensurate with the scale of growth. Planning permission will only be granted for new development if it can be demonstrated that there is, or will be, sufficient infrastructure capacity to support and meet growth requirements.

4.7 These key requirements must be planned for during the plan period and represents the most significant growth in a generation. The Council intends that the requirements for growth arising in Waltham Forest should be met within the Borough. Detailed policies on these matters are covered in separate chapters of this plan.

4.8 In planning for the proposed level of growth, the Council recognises that long term forecasts may be susceptible to change. As projections are subject to uncertainty, forecasts may need to be amended to reflect emerging changes as and when new information becomes available. If, as a result of subsequent monitoring, growth forecasts need to be amended or policies cannot achieve the intended outcomes, this would trigger a review of this Plan. Further information on monitoring and implementation is included as a separate chapter of this document.

4.9 A key objective of this Plan is to identify the necessary infrastructure projects required to support growth. This plan includes policies to secure the provision of the required levels of social and physical infrastructure and the timely delivery of these requirements particularly in locations where they will contribute positively to the well-being and social cohesion of local communities. In providing infrastructure to support development, close partnership working will be maintained with key agencies, relevant infrastructure providers and the development industry. There are a variety of organisations and bodies, including the Council, that are responsible for delivery. Some of the key public bodies include the Greater London Authority (GLA), Transport for London (TfL), Clinical Commissioning Group, NHS, Thames Water, National Grid, Electricity and Gas Companies, Metropolitan Police.

4.10 Developer contributions will continue to be an important mechanism to address any shortfalls in social and physical infrastructure that arise as a direct result of new developments. The full range of infrastructure requirements, projects and programmes, phasing and funding arrangements are included in the Infrastructure Delivery Plan (IDP).

Location and Management of Growth

4.11 Having considered the overall level of growth required, the Council must decide where new development should be located. This section sets out the Council's preferred approach to distribution of growth and the strategic policies that will apply in ensuring good management of growth. The proposed distribution of growth to the identified areas as outlined below takes into account the planning principles set out in the National Planning Policy Framework - that plans should take account of the varied roles and character of different areas, and actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling and focus significant development in locations that are or can be made sustainable.

Policy 3

Location and Management of Growth

New development should provide a well balanced mix of economic, social and environmental benefits at the most appropriate locations to support the development of a network of well-connected, sustainable, high quality, attractive, locally distinctive and healthy places. A sustainable approach to accommodating growth will be achieved by:

- A. Focusing new development, regeneration and investment activities in the strategic locations (see Key Diagram) as identified below. These will be the primary locations for growth involving new homes and jobs with supporting infrastructure. Spatial policies for sub-areas and the strategic locations within them are included in Chapters 5-7.
 - i. South Waltham Forest: A minimum of 15,000 new homes and 3,250 new jobs in the strategic locations of Lea Bridge, Low Hall, Church Road, Leyton, South Leytonstone, Leytonstone District Centre, Whipps Cross and Bakers Arms.
 - ii. Central Waltham Forest : 8,000 homes and 1,600 jobs in the strategic locations of Blackhorse Lane, Walthamstow Town Centre, Forest Road Corridor and Wood Street District Centre.
 - iii. North Waltham Forest: 4,000 homes and 1,940 jobs in the strategic locations of North Chingford District Centre, Sewardstone Road Neighbourhood Centre, South Chingford District Centre, Highams Park District Centre and the North Circular Corridor.
- B. Directing and consolidating any new retail and other town centres uses including built leisure and new social infrastructure facilities to the designated centres and maximising residential opportunities in these centres through mixed use development. (Chapter 10 Distinctive Centres and High Streets)
- C. Protecting, promoting and managing designated employment areas to secure more jobs for local people. (Chapter 9 Building a Resilient Economy).

- D. Protecting designated sites and areas (Green Belt, Metropolitan Open Land, Special Protection Areas, Ramsar Sites, Conservation Areas, and Listed Buildings (Chapters 15-16 Enhancing and Preserving our Heritage & Environment). Heritage assets in these locations will be secured and supported with investment to embed the rich, natural, cultural and heritage opportunities of the borough;
- E. Making effective use of previously developed land, except where land is of high environmental value or purposely safeguarded or protected for particular uses as identified on the Policies Map. In considering suitable sites for growth proposals redevelopment of underused and vacant land, in particular, sites listed on the Brownfield Land Register will be prioritised;
- F. Ensuring that development is planned and implemented in a coordinated way in identified areas of change, guided by Supplementary Planning Documents (SPD), Area Investment Plans, 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.
- G. The development of broad concept plans prepared by stakeholder groups or developers for small areas or clusters of sites will be supported. The approval process for such plans will be mainly via Supplementary Planning Document (SPD) legislation.
- H. Applying a comprehensive set of actions to implement the plan strategy including:
 - i. ensuring that infrastructure required to support growth is phased and funded in line with the Infrastructure Delivery Plan (IDP), which will be prepared and updated on a regular basis;
 - ii. resisting any proposed development that will prejudice the future development of a neighbouring site and or prohibit the comprehensive development of a larger site;
 - iii. working with duty to co-operate partners, stakeholders and the development industry to maximise development opportunities;
 - iv. where necessary, using compulsory purchase powers to tackle land issues which inhibit regeneration.

4.12 The above policy, together with other policies of this plan, steers most new development to those places that offer the best access to services and facilities (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.

4.13 This strategy directs most forms of new development and growth to the more sustainable locations, particularly the southern growth zone, which represents the largest and most transformative location for growth in the borough over the Plan period. Other growth locations will also have an important role in creating a network

of well connected, sustainable and locally distinctive and healthy places. They will act as the primary locations for growth and investment in homes and jobs with supporting infrastructure. These locations have been identified to optimise connectivity and access to services and jobs as shown in Figure 1 (Key Diagram).

4.14 The distribution of growth in the identified strategic locations builds on existing committed development. Opportunities in these areas will allow new development in a range of sites (small, medium and large) spread throughout the borough as a broader range of sites will provide greater choice in the provision of different housing and employment types.

4.15 Focusing growth in the identified strategic locations will reduce the pressure for substantial incremental development in predominately established residential areas. By promoting synergy in clusters of sites/areas, more sustainable places and growth locations will be created. In these areas, new homes and jobs will be delivered close to community facilities and public transport and there will be enhanced opportunities for developing a unique sense of community and place. Distributing growth as proposed will bring the opportunity to transform places and communities, delivering renewal and strategic scale regeneration.

4.16 The identification of the strategic locations has been derived and informed by the outcome of previous consultation and the Local Plan evidence base. At the Issues and Options stage (Direction of Travel document 2017), alternative locations for accommodating growth were presented. There was strong support for the combined approach involving a dispersed pattern of growth in identified hubs, town centres and opportunity locations. Sites at these locations have been tested for their potential capacity through the Growth Capacity Study (2018) and this alongside the large scale regeneration opportunity presented in the south of the borough, forms the basis and rationale for distributing growth.

Areas of Change and Opportunity

4.17 The draft Local Plan has identified the strategic locations as the main focus for development and investment within the borough. Within Strategic Locations, there will be 'Areas of Change and Opportunity' consisting of small clusters of sites where an integrated, coordinated and comprehensive approach to site planning would be encouraged over piecemeal development. It is expected that development opportunities would be maximised in these areas.

4.18 Further work to identify these areas will be undertaken and published separately. Priorities for the Strategic Locations and Areas of Change and Opportunity are set out in the area policies in this plan. The implementation and delivery section of this plan set out the various tools that could be used to deliver development in these areas.

Masterplans

4.19 Within Strategic Locations generally, the Council intends to prepare Masterplan SPDs to guide and co-ordinate development. The purpose of a Masterplan SPD is to ensure that sites come forward in a coherent manner and contribute to the overall vision and objectives for the area, as developed through the consultation process. It will be used as a material consideration when determining planning applications. Master plans have an important role in providing guidance to developers, landowners and residents. They will be based upon an understanding of the place and informed by available evidence including the local context, heritage designations and other development constraints. They will set out the intended implementation and phasing of development, identifying responsibilities for delivery and sources of funding. They will also provide a clear focus for partners, including businesses, community services, community groups and public transport providers to work together to bring investment into the area.

4.20 Prior to the preparation of Masterplan SPDs, it is expected that some sites may come forward for redevelopment. This policy therefore welcomes the establishment of development partnerships where necessary in bringing forward such sites for redevelopment through an agreed design concept plan or masterplan.

4.21 The role of Planning Briefs will be particularly important in bridging the gap between the development plan and a planning application. They will be used to promote the development of nearby sites, address a particular site constraint or opportunity and give further guidance on the interpretation of the development plan policies and principles set out in the Plan.

4.22 The design policies of this plan, along with a range of thematic policies and principles will be used to inform the preparation of Masterplan SPDs and Planning Briefs. Through consultation work on their preparation, local communities will have further opportunities to help shape proposals for local areas and neighbourhoods.

Policies Map

4.23 The Policies Map shows the areas of the Borough where the area-based policies of the Plan would apply. This plan carries forward the plan designations from the currently adopted Local Plan. Changes to existing designations are listed in the Appendices (Policies Map Changes).

4.24 The Borough is heavily built up with large areas predominately in established residential use. Outside the established protected areas such as Green Belt/MOL, it is considered that additional housing and employment needs could be accommodated as part of mixed use development without purposely allocating land for specific uses.

Brownfield Land Register

4.25 To guide decision making, the Council intends to make effective use of the Brownfield Land Register as provided for by the NPPF and Regulation 3 of the Town and Country Planning (Brownfield Land Register) Regulations 2017. This Register identifies the brownfield sites in the borough that the Council considers suitable for housing and other uses. Where necessary, the Council will apply Part 2 of the Register (Permission In Principle) on those sites more likely to benefit from this mechanism. This should provide clear signals to potential developers about opportunities, and certainty to local communities about the intended future of those sites.

4.26 Sites selected for the purposes of the Brownfield Register will come from evidence base studies including the GLA Strategic Housing Land Availability Assessment, Growth Capacity Study and 'Call for Sites' exercises the Council will undertake from time to time. The current Growth Capacity Study (2018) provides a high level assessment of potential sites. This is an indicative list of possible sites, which will require further monitoring and testing for suitability, availability and achievability for future housing, social infrastructure and employment developments.

Call for Sites

4.27 This consultation includes a 'Call for Sites' exercise providing further opportunity for individuals, landowners and developers to suggest sites within the borough for development over the next 15 years. The 'call for sites' exercise will be used to identify the potential pool of sites to be included in the Brownfield Land Register. The site suggestions received will also be used to inform the 'Proposed Submission' version of the Plan to be published Spring 2020.

Good Growth

4.28 The London Plan seeks to promote good growth in London by building strong inclusive communities, making the best use of land, creating a healthy city, delivering homes, growing a good economy and increasing efficiency and climate change resilience. In support, it is necessary to ensure that Waltham Forest's future growth is pursued and planned in the most sustainable way through a set of overarching policy principles enshrined in the plan. This includes maintaining a good balance between economic, social and environmental objectives, creating livable places for people to live, study, work and visit, as well as capturing climate change objectives such as reducing the Borough's carbon footprint and creating resilient and adaptive environments in this time of "Climate Emergency".

Policy 4

Ensuring Good Growth

In ensuring good growth, development proposals will be expected to satisfy the following requirements, unless demonstrably inappropriate to do so:

- A. Make efficient use of land through intensification and mixed use development (Policy 5 - Encouraging Mixed Use Development and Intensification);
- B. Contribute to improving and enabling healthier lifestyles (13 'Promoting Health and Well-being');
- C. Provide a broad range of housing choice by size and tenure including affordable housing and cater for people with special housing needs (8 'Decent Homes for Everyone');
- D. Contribute to providing for a wide range of local employment opportunities that offer a choice of jobs in different sectors of the economy (9 'Building a Resilient and Creative Economy');
- E. Support the creation of successful neighbourhood communities, the provision of adequate social and physical infrastructure (12 'Social and Community Infrastructure');
- F. Incorporate high quality design solutions and contribute positively to the quality of the physical environment (14 'Creating High Quality Places');
- G. Contribute to the response to climate change, through mitigation and adaptation, the use of sustainable building materials, low carbon heating and energy efficiency (18 'Ensuring Climate Change Resilience');
- H. Protect and enhance existing green and blue infrastructure, including open space and leisure facilities, biodiversity and nature conservation (Chapter 17 - 17 'Protecting and Enhancing the Environment');
- I. Create safe environments, which incorporates appropriate design solutions and crime prevention measures that assist in reducing crime, the fear of crime and anti-social behavior (14 'Creating High Quality Places'); and
- J. Protect heritage assets including Conservation areas and Listed buildings (16 'Enhancing and Preserving our Heritage').

4.29 This Plan seeks to deliver a sustainable balance of development through the overarching policy principles set out above. These are covered in detailed policies in other chapters of the Plan as referenced above. Land is a valuable resource. In providing for future needs it is necessary to make the best use of land as efficiently as possible. Accordingly, this policy seeks to ensure the reuse of previously developed land and buildings. Also, the way people interact with the physical environment (built and natural) has a significant impact on health well-being. Providing a range of housing types and employment spaces is also necessary to achieve the overall objectives of the plan.

4.30 Other important policy principles enshrined in the plan seek to encourage the highest sustainability standards in development. This should help generate wider benefits to support climate change objectives regarding carbon reduction, energy efficiency, low carbon heating, use of renewable resources etc. The built environment will need to be resilient to the potential impacts of climate change.

4.31 All future development will need to be supported by suitable social, green and blue infrastructure of all types and set within environments that reflect the rich, diverse culture, character and history of the borough. This will involve making the best use of existing infrastructure as well as significant investment for the provision of new and improved infrastructure. It is expected that all new development will be well-designed, accessible and safe including for people with disabilities, young and older people. Schools, health care facilities, shops and other services need to be available in accessible locations along with parks, sports facilities and well-maintained local public open space, forming part of a wider '*green infrastructure network*' threading through the Borough to adjoining Boroughs and linking to the open countryside and Epping Forest beyond.

Mixed Use Development and Intensification

4.32 In accommodating growth, this plan supports the principle of mixed use development. Developing a mix of uses on individual sites and across an area can be beneficial in a number of ways, such as reducing the need to travel between homes, jobs and services, providing a range of activities through the day, and so increasing community, safety and security; contributing to the creation of areas that are diverse, distinctive and successful; allowing an efficient use of land, with other uses developed above those uses which need direct ground floor access or a street-level frontage, such as shops; providing more opportunities for the development of housing and employment.

4.33 Intensification is not new in Waltham Forest. It has already been occurring in the borough for years. To accommodate the significantly higher growth required by this Plan, this needs to increase and accelerate. The challenge is to ensure that the "right forms" of intensification occur at the "right locations". Intensification will support the sustainability of the built environment by maximizing use of existing infrastructure, including de-centralised energy networks, statutory utilities, roads and parks. It also supports the use of existing social facilities, services and amenities,

such as fire stations, libraries, recreation spaces and schools. It will provide opportunities to integrate housing options for people of all ages and stages of life into established communities and will also help revitalise existing neighbourhoods.

Policy 5

Encouraging Mixed Use Development and Intensification

Mixed Use Development

In contributing towards the supply of homes and jobs, mixed use development proposals will be encouraged particularly in the strategic locations and other appropriate areas of the Borough. In considering whether a mix of uses should be sought, the most appropriate mix of uses and whether it can practically be achieved, the Council will consider all of the following:

- A. The location of the development and the character of the area;
- B. Whether the proposed mix of uses would be appropriate to the function of the particular street/road frontage and will not demonstrably conflict with other policies in this document;
- C. Design quality of the proposal;
- D. The financial and economic viability of the development;
- E. The contribution that land use swaps and off-site contributions can make;
- F. Any other planning objectives considered to be a priority for the particular area.
- G. Extent to which planning conditions could be used to protect the amenity of existing and future residents and businesses, and;
- H. The compatibility of the proposed use with existing, proposed and adjoining uses.

Approach to Intensification and density

Opportunities for intensification of development involving housing and employment uses will be promoted at appropriate locations, justified in accordance with the following approach:

- I. Reinforcement: applicable to sites/areas with robust and desirable character where opportunities for intensification will involve a modest increase in density/floor area ratio (FAR), typically on sites/areas outside the Designated Centres, Major Routes, Borough Arrival Points and Strategic locations. This will also apply in traditional suburban locations where there is title character except housing of uniform design and reinforcement will enhance character and design;
- J. Transition: applicable to sites/areas where a considerable increase in density /floor area ratio will be expected, including Designated Centres, Major Routes, Borough Arrival Points and the Strategic Locations;
- K. Transformation: applicable to sites/areas with a fragmented urban grain, where a transformation of existing character can be justified to deliver substantially more development. Sites suitable for such development will be the strategic

locations with high public transport accessibility and significant other planned infrastructure investment.

Development proposals must be informed by an assessment of the site's immediate context with regard to the above and also consider the impact on existing heritage assets, including key criteria as set out in Historic England/ Design Council CABE guidance documents.

4.34 One of the key thrusts of Government Policy is to make the most effective use of land. In accommodating substantial growth, this policy seeks to promote an increase in building density where appropriate, taking into account the character of the surrounding area and access to services and facilities to ensure an efficient use of land. Intensification involves the development of a property, site or area at a higher density than currently exists, through development, redevelopment, infill and expansion or conversion of existing buildings. This plan does that whilst planning for the optimum amount of intensified good growth and sustainable development supported by the right level of social infrastructure.

4.35 Intensification of residential and employment areas is being encouraged since it offers opportunities for economic development and takes advantage of already serviced but underused land and helps to improve the vibrancy of existing areas. This policy particularly seeks to encourage intensification within the general built-up area, but particularly in the strategic locations. The policy also seeks to encourage the development of building types that more efficiently use existing urban space and services.

4.36 Evidence from the Characterisation and Intensification Study (2019) supports a character-led approach to intensification. This policy draws attention to the tools the Council will apply in ensuring that the right forms of intensification occur at the right locations. The London Plan defines density in terms of net residential site area, which includes the proposed homes, non residential uses in mixed use buildings, ancillary uses, parking areas. However, counting large on-site, publicly accessible open spaces may not be a good measure of density. Accordingly, in addition to residential unit density, this plan seeks to complement this measure with plot ratio. Floor Area Ratio, (FAR) compares the total floor area of a building or collection of buildings to site area. It is selected as a key density measurement for its ability to capture densities in mixed use developments, as it includes all floor area instead of simply residential uses. In practice, however, the precise density for any individual site will be determined by its immediate context, on-site constraints, the type of development proposed and the need to provide an appropriate mix of dwellings or employment units to meet the community's needs.

4.37 The application of the tool is to enable the effective use of land, ensuring that appropriate density and intensification is sought informed by the character and location. As a general approach, areas suitable for reinforcement of existing character will typically have a density of up to 1.4 FAR (115-175dph). Areas where transition of character is required will require a further uplift and intensification up to 2.0 FAR

(150-250 dwellings per hectare (dph)). Furthermore areas for transformation will also typically require up to 4.0 FAR for high intensity blocks and 5.0+ FAR, where hyper density (e.g. equivalent to Inner/Central London densities) is possible (250dph – 450+dph). Further information and practice guidance on the application of this tool will be included in the Urban Design SPD.

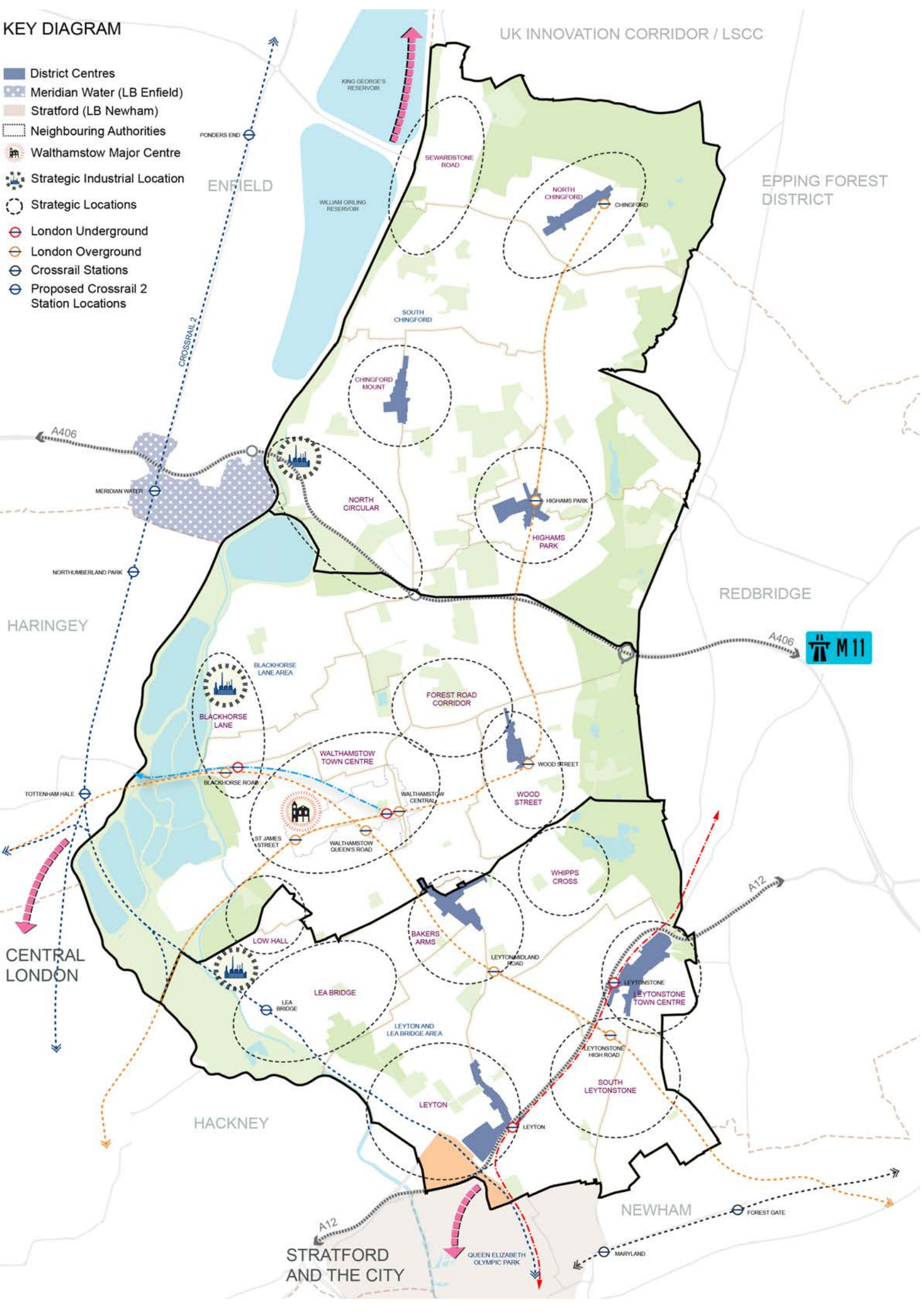
Intensification Approach	Floor Area Ratio (FAR)	Dwellings Per Hectare
Reinforcement	up to 1.4	115-175
Transition	up to 2.0	150-250
Transformation	up to 4.0- 5.0	250-450+

Table 4.1



KEY DIAGRAM

- District Centres
- Meridian Water (LB Enfield)
- Stratford (LB Newham)
- Neighbouring Authorities
- Walthamstow Major Centre
- Strategic Industrial Location
- Strategic Locations
- London Underground
- London Overground
- Crossrail Stations
- Proposed Crossrail 2 Station Locations



5 South Waltham Forest

5.1 This chapter sets out the spatial approach applicable to South Waltham Forest. In this Plan, the borough is divided into three areas: South Waltham Forest, Central Waltham Forest and North Waltham Forest. Each of these parts are made up of thriving places and diverse communities rich in culture and heritage. The divergent character of each area presents different challenges and opportunities requiring a more locally distinctive policy response. The policies in the section should be read in conjunction with other policies in the Local Plan.

Area Profile

5.2 The south offers the largest opportunities for regeneration and good growth in the borough, and London, both in the plan period and beyond. The area's potential for significant regeneration and good growth is recognised by the Mayor of London and in the London Plan, with the Lower and Upper Lee Valley designated as Opportunity Areas at a sub-regional level; and with Leyton, Leytonstone and Bakers Arms designated as Strategic Areas for Regeneration. Beyond London, at a wider regional level, it is located within the UK Innovation Corridor.

5.3 The south encompasses the area extending from Low Hall Sports Ground and the A104 to Queen Elizabeth Olympic Park and A12 in the south, bounded by the Lee Valley Regional Park, River Lee and Epping Forest. The A112 (Leyton High Road) runs north to south and broadly splits the area in half. To west of the A112 is the Southern Growth Zone, encompassing the areas of Lea Bridge, Low Hall, Church Road and Leyton Town Centre. The east includes Bakers Arms District Centre, Whipps Cross and Leytonstone Town Centre and South Leytonstone. The rest of the area is supported by Neighbourhood Centres including Markhouse Corner and Blackhorse Lane.

5.4 In the north, the south area meets the central area, the civic hub of the borough. Here it abuts Walthamstow Wetlands and reservoirs at Coppermill Lane and Walthamstow Central, including St James Street and Walthamstow Queens Road Station. Both east and west are defined by green spaces - River Lee and Lee Valley Regional Park (which is Metropolitan Open Land) and abuts the Hackney Marshes, which continue into Clapton at the other end of Lea Bridge Road in the London Borough of Hackney. The east is defined by Epping Forest and borders Wanstead Flats in the London Borough of Redbridge.

5.5 The area has two London Underground Stations, Leyton and Leytonstone on the Central Line. There are also two London Overground stations: Leyton Midland Road and Leytonstone High Street – both on the Gospel Oak to Barking line. In addition, Lea Bridge Station provides National Rail services to Tottenham Hale and Stratford. There are aspirations for a further National Rail station at Ruckholt Road on the same line. The area has benefited from investment in new cycle routes together with improvements to the pedestrian environment, especially along the Lea Bridge Road, as part of Enjoy Waltham Forest (through the Transport for London Mini Holland programme). All of which make the area highly accessible.

5.6 The character of the south is predominantly Victorian with some Edwardian and post-war and modern development, and it is noticeably higher density than the north. The area is characterised by terraced streets, but also larger developments. such as Ruckholt Road or Johnston Court in Oliver Road. Lea Bridge is characterised by the employment land at Argall Avenue, Lammas and Rigg Approach; and the new 97 Lea Bridge Road. Low Hall by the Depot and Church Lane by Estate Way. Whilst Leyton Mills and Leyton Orient Football club form distinctive parts of Leyton. Whipps Cross is defined by the hospital. Bakers Arms and Leytonstone are traditional town centres.

5.7 An additional aspect of the character of the area is that it includes some of the densest estates in the borough and high levels of historic deprivation alongside some of the Souths' Conservation Areas - Bakers Arms Town Centre, Browning Road Conservation Area and Leytonstone Conservation Area; all of which serve to increase the areas historic appeal and heritage value.

5.8 Overall, the south provides greater opportunity for good growth and regeneration with opportunities to deliver a new London mix of new homes, employment and jobs together, alongside culture, sporting facilities, parks, open space and forest in an accessible location.



Vision for the South

The greatest opportunities for regeneration and good growth in the borough lie in the South. By 2035, the interlinked neighbourhoods and town centres will have become new and exciting piece of the city.

Inward investment in the area will have delivered 15,000 new quality homes. These should be genuinely affordable, and will be located alongside new infrastructure, employment land and 3,250 new jobs alongside improved transport accessibility.

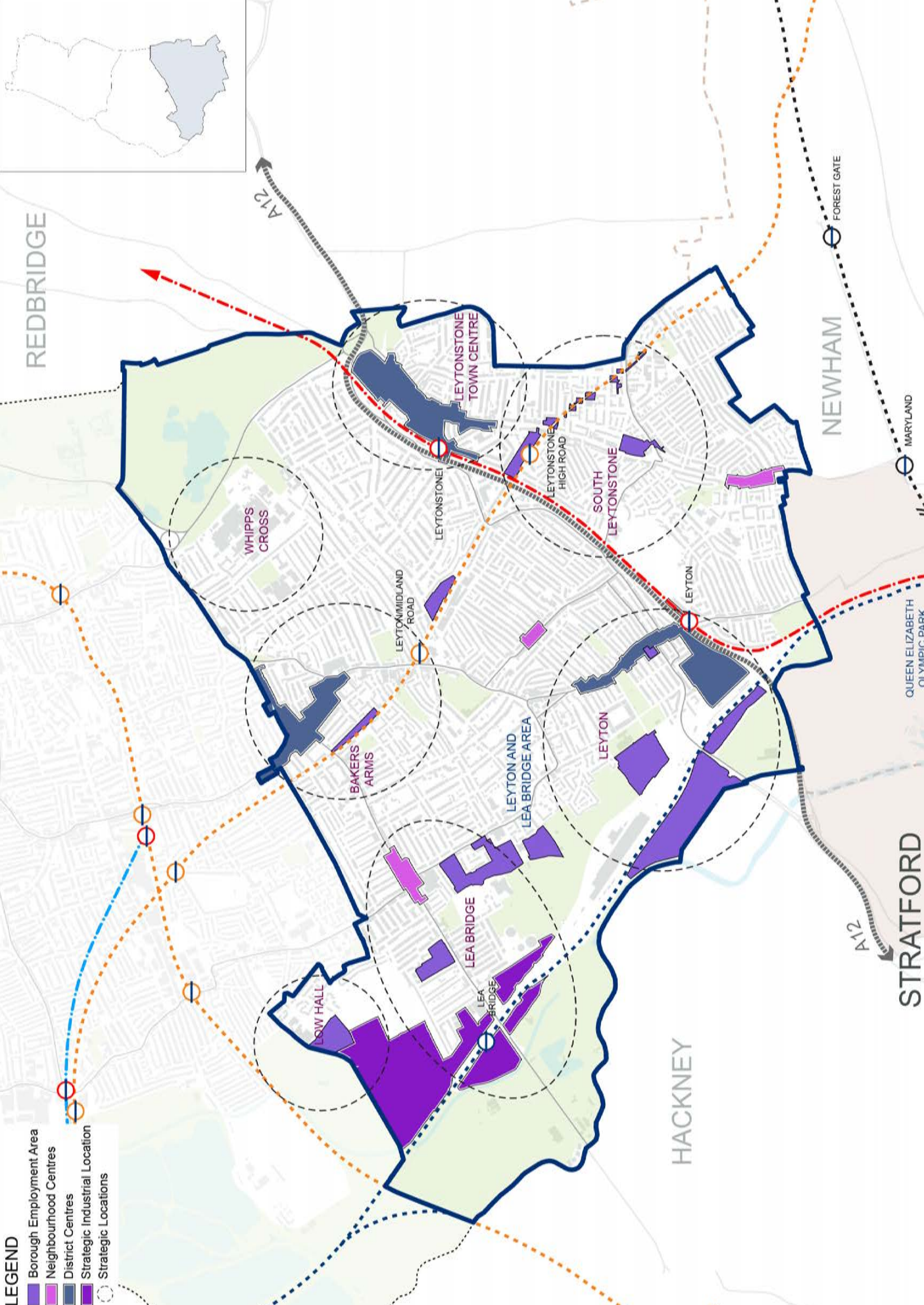
The Southern Growth Zone, comprising Lea Bridge, Low Hall, Church Road and Leyton will have been transformed through cultural place-making and become distinctive neighbourhoods with new quality homes. Lea Bridge, Low Hall and Church Road will continue to be the largest employment areas in the borough but will become home to a dynamic hub of a diverse, growing and resilient creative economy which retains its industrial nature. A new station at Ruckholt Road will further improve the connectivity of Leyton – opening opportunities for an urban extension at Leyton Mills and New Spitalfields. Coronation neighbourhood will have been delivered and will become a desirable and liveable part of the borough.

The distinctive areas of Leytonstone, South Leytonstone and Bakers Arms will be enhanced by transitioning, building on their historic characteristics, into attractive metropolitan cultural town centres with new quality homes. 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 quality homes. These areas will have improved transport access via the new Elizabeth Line to the south.

All of these places will be defined by their access to high quality green and open space across the South, including the Lee Valley Regional Park and the River Lea. Enjoy Waltham Forest and other improvements will provide enhanced connectivity and access to social and community infrastructure along with access to a thriving cultural and unique sports offer.

LEGEND

- Borough Employment Area
- Neighbourhood Centres
- District Centres
- Strategic Industrial Location
- Strategic Locations



Policy 6**South Waltham Forest**

As the priority area for regeneration and good growth, proposals will be supported where they:

- A. Contribute to the delivery of a minimum of 15,000 new quality homes across the South Area;
- B. Promote the south as the pre-eminent employment area in the borough and support the delivery of at least 3,250 new jobs;
- C. Retain, safeguard and intensify existing employment land including SIL and BEA, and co-location, where appropriate to support the delivery of a diverse and resilient economy;
- D. Support the delivery of sustainable neighbourhoods at Lea Bridge, Leyton, Church Road and Low Hall; Leytonstone, South Leytonstone, Whipps Cross and Bakers Arms – through providing new quality homes, employment and workspaces, retail and social infrastructure;
- E. Enable the designated centres to diversify and evolve into vibrant mixed-use places supported by increased population growth;
- F. Encourage major retail and leisure investment to the District Centres of Leytonstone, Leyton and Bakers Arms; and supporting other centres to provide convenience-based retail investment (See Distinctive Town Centres and High Streets);
- G. Contribute to the cultural and sporting assets of the area to increase the visitor economy, support the areas' local centres and businesses, and build a vibrant evening and night-time offer;
- H. Ensure that new development and public realm improvements across the area contribute to the delivery of permeable, inclusive connectivity and accessible streets for all;
- I. Encourage improved cycling and pedestrian network across the South, and finding new linkages and connections for walking and cycling to Lee Valley Regional Park, Queen Elizabeth Olympic Park, Epping Forest and Wanstead Flats and other destinations;
- J. Ensure that place-making principles are based on character of the area, particularly taking advance of the areas heritage, cultural and green assets including, but not exclusively, the Lee Valley Regional Park, River Lee and Queen Elizabeth Olympic Park;
- K. Ensure that new development and public realm improvements enhance the importance of gateway locations and the sense of arrival into the borough. These include but are not exclusive to Lea Bridge Road, Leyton, Thatched House and High Road Leytonstone, and all Transport Hubs.

5.9 The south presents an enormous and transformational opportunity for good growth and regeneration in Waltham Forest and London. Development must support the need to deliver a minimum of 15,000 new quality homes, whilst maintaining its

economic importance as the pre-eminent employment area within the borough. Employment land in the area will be expected to be intensified, with co-location a consideration to ensure the delivery of at least 3,250 additional jobs, and a mixed and resilient economy.

5.10 New quality homes will be expected to be provided in parallel with new employment, in liveable and mixed-use neighbourhoods – providing vibrancy and diversity. Retail, leisure, cultural and evening and night-time offer will be directed to designated district centres. Neighbourhood centres and local centres will provide retail and services.

5.11 The area has already seen massive investment in transport accessibility from the re-opening and improved rail service at Lea Bridge Road to upgrading of the cycle infrastructure through the Enjoy Waltham Forest Mini Holland scheme. Such improvements need to continue to support the regeneration and good growth of the South, including the proposed delivery of Ruckholt Road and new development providing good quality public which increase permeability and connectivity around the borough.

5.12 The delivery of transformational regeneration and good growth should be based on place-making principles using the character, heritage and culture of the area. The south of the borough has important gateway locations which should be celebrated and create a sense of arrival in the borough.

Development Principles

5.13 Development principles for the strategic locations within this area including Lea Bridge and Church Road, Low Hall, Leyton, South Leytonstone, Leytonstone District Centre, Whipps Cross and Bakers Arms are set out below.



Policy 7

Lea Bridge and Church Road Strategic Location

Development in the Lea Bridge and Church Road Strategic Location over the Plan period will deliver the following priorities:

1. Achievement of minimum growth targets of 2,850 new homes;
2. Provides opportunities to support higher density housing around the station and to deliver sustainable neighbourhoods;
3. Retains existing employment land (both SIL and BEA) to provide a net increase in jobs through intensification, co-location and renewal;
4. Safeguard Argall Industrial Estate;
5. Retains, diversifies and intensifies existing employment floorspace at Estate Way Area to allow for redevelopment and co-location with new homes and other appropriate use;
6. Explores development opportunities in areas of change such as the Gas Holder site;
7. Re-provides the waste services at Estate Way in line with the requirements of the North London Waste Plan;

8. Provides new workspace, modern light industrial/manufacturing/production space, retail, food and beverage, social infrastructure, and space for cultural uses;
9. Delivers active frontages along commercial frontages as part of mixed use development, to ensure vitality and safety within the area;
10. Retention of Markhouse Corner Neighbourhood Centre boundary;
11. Revitalises Markhouse Corner Neighbourhood Centre through a flexible approach to A Class Uses;
12. Delivers a sense of arrival in Lea Bridge at the junction of Lea Bridge National Rail Station, Lea Bridge Road (West) and Orient Way as an important gateway into the borough;
13. Strengthen the sense of place through understanding of the areas local character and heritage, considering opportunities for taller buildings in appropriate locations;
14. Uses designing out crime principles along the Lea Bridge Road;
15. Improves, public realm and public spaces across the area and walking and cycling accessibility, connectivity, permeability and legibility to Lee Valley Regional Park, Dagenham Brook, Leyton Jubilee Park, Marsh Lane and the River Lee, including exploring the possibility for bridges over Dagenham Brook, as well as other identified routes;
16. Provides appropriate flood mitigation in Flood Zone 2 to 3 and other areas including SUDs strategies.

Policy 8

Low Hall Strategic Location

Development in the Low Hall Strategic Location over the Plan period will deliver the following priorities:

1. Achievement of minimum growth targets of 700 new homes;
2. Replaces and upgrades the borough's principal operational depot facility and associated infrastructure;
3. Retains, enhances and intensifies employment land at Low Hall Business Park;
4. Retains and enhances the Low Hall Sports Ground;
5. Improves accessibility, permeability and legibility from Low Hall into the Lea Valley Regional Park and Lea Bridge Station by improved bus routes, walking and cycling;
6. Strengthen the sense of place through understanding of the areas local character and heritage;
7. Necessary flood risk mitigation.



Policy 9

Leyton Strategic Location

Development in the Leyton Strategic Location over the Plan period will deliver the following priorities:

1. Achievement of minimum growth targets of 6,350 new homes;
2. Supports higher density housing around the Leyton Tube Station;
3. Delivers new development around the new rail station at Ruckholt Road;
4. Intensifies development at Leyton Mills area of change to unlock the site for diverse, thriving, mixed-use sustainable neighbourhood, including new quality homes, employment and workspace, appropriate retail provision, cultural uses and supporting social and community infrastructure;
5. Delivers intensified development at New Spitalfields area of change in the event the market comes up for redevelopment during the plan period to create a thriving, mixed-use sustainable neighbourhood, including new quality homes, involving the re-provision of the existing employment floorspace and modern light industrial/manufacturing and workspace, cultural uses and supporting social and community infrastructure;

6. Delivers a new sustainable neighbourhoods at Coronation Gardens Neighbourhood Area, with improved public realm for pedestrians and cyclist, enhancing the connectivity to and from the area, and underpinned by social and community infrastructure; and cultural uses;
7. Retention of Leyton District Centre Boundary;
8. Delivers workspace, offices, and smaller industrial units in Leyton District Centre;
9. Establishment of a primary shopping area within the District Centre boundary and the de-designation of the existing secondary frontage. The application of a flexible approach to changes of use (involving A Class Uses) outside the designated primary area. (See Chapter on Distinctive Centres and High Streets);
10. Protects and enhances the Leyton High Road Conservation Area;
11. Grows the visitor economy, building on existing assets of Leyton Orient Football Club, Queen Elizabeth Olympic Park, and Leyton Cricket Ground, to support the enhancement of Leyton District Centre;
12. Improves public realm and public spaces across the area and walking and cycling accessibility, connectivity, permeability and legibility to the Lee Valley Regional Park, River Lee and Queen Elizabeth Park, as well as other identified routes;
13. Contributes to a sense of arrival at Leyton Underground Station and at East Way (A12);
14. Apply place-making principles that reflect the character and local distinctiveness of Leyton, particularly taking advantage of the heritage, cultural and green assets and considers the opportunities for taller buildings in appropriate locations.

South Leytonstone Strategic Location

Development in the South Leytonstone Strategic Location over the Plan period will deliver the following priorities:

1. Achievement of minimum growth targets of 500 new homes;
2. Delivers higher densities and taller buildings around Leytonstone High Road Overground Station;
3. Utilisation of existing employment land (including railway arches) for mixed-use intensification and co-location, including the provision of new workspace, light industrial (where appropriate), food and drink and offices;
4. Regeneration and upgrading of Avenue Road Estate;
5. Sense of arrival in South Leytonstone at Thatched House and Leytonstone High Road Overground station;
6. Expands the retail, food and beverage and cultural offer, and required social and community infrastructure, at appropriate locations, including Thatched House, Harrow Green and around the Leytonstone High Road Overground station;

7. Improves public realm, across the area, (including Harrow Green, Thatched House, Cann Hall Road) and walking and cycling accessibility, connectivity, permeability and legibility to Elizabeth Line Stations at Maryland and Forest Gate; Langhorne Park, Wanstead Flats and the Queen Elizabeth Olympic Park, Leyton and Leytonstone, as well as other identified routes;
8. Apply place-making principles that reflect the character and local distinctiveness of South Leytonstone, particularly taking advantage of the heritage, cultural and green assets and considers the opportunities for taller buildings in appropriate locations.



Policy 10

Leytonstone Strategic Location

Development in the Leytonstone Strategic Location over the Plan period will deliver the following priorities:

1. Achievement of minimum growth targets of 700 new homes;
2. Delivers diverse and mixed-use intensification along the High Road, to support Leytonstone as the borough's second most important town centre and focus for investment;
3. Retention of the existing designated district centre boundary;
4. Encourages the delivery of new workspace, offices and employment uses;

5. Explores intensification opportunities in the area around McDonalds and the Tescos store;
6. Explores development opportunities in other areas of change around the Matalan store and Church Road Car Park;
7. Establishment of a primary shopping area within the District Centre boundary and the de-designation of the existing secondary frontage and the application of a flexible approach to changes of use (involving A Class Uses) outside the designated primary area. (See Chapter on Distinctive Centres and High Streets);
8. Protects and enhances the Browning Road Conservation Area;
9. Apply place-making principles that reflect the character and local distinctiveness of Leytonstone, particularly taking advantage of the heritage, cultural and green assets;
10. Improves public realm and public spaces across the area and walking and cycling accessibility, connectivity, permeability and legibility to Epping Forest, Wanstead Flats, as well as other identified routes;
11. Delivery of step-free access to Leytonstone underground station and improves its integration with surrounding areas.





Policy 11

Whipps Cross Strategic Location

Development in the Whipps Cross Strategic Location over the Plan period will deliver the following priorities:

1. Achievement of minimum growth targets of 1,700 new homes;
2. Comprehensive redevelopment of Whipps Cross Hospital area of change as a state-of-the-art University Hospital;
3. Delivers a health and well-being centre including a General Practitioners centre in partnership CCG;
4. Delivers quality new homes, including genuinely affordable homes for workers;
5. Considers appropriate range of other uses within the area including social and community infrastructure, retail, food and beverage, employment uses and cultural uses;
6. Apply place-making principles that reflect the character and local distinctiveness of Whipps Cross, particularly taking advantage of the heritage, cultural and green assets;
7. Improves public realm and public spaces across the area and walking and cycling accessibility, connectivity, permeability and legibility to and from Whipps Cross Hospital, to Wood Street, Bakers Arms and Leytonstone, as well as other identified routes;
8. Protects and enhances the significance of Epping Forest whilst improving access and capitalising on it as a visitor attraction.



Policy 12

Bakers Arms Strategic Location

Development in the Baker Arms Strategic Location over the Plan period will deliver the following priorities:

1. Achievement of minimum growth targets of 850 new homes;
2. Higher densities and taller buildings around Leyton Midland Road Overground Station;
3. Explore the potential to deliver workspace and offices, (including opportunities at railway arches) to deliver an appropriate mix of food, drink, workspace, light industrial uses and creative industries;
4. Retention of the existing designated district centre boundary;
5. Explores development opportunities Leyton Green and Stage Coach Bus Station;
6. Establishment of a primary shopping area within the District Centre boundary and the de-designation of the existing secondary frontage and the application of a flexible approach to changes of use (involving A Class Uses) outside the designated primary area;
7. Improve the design quality of existing shopfronts at the junction of Lea Bridge Road, Hoe Street and High Road Leyton, along with other identified areas;
8. Apply place-making principles based on the character of the area, particularly taking advance of the area's heritage, cultural and green assets, as well as ensuring a safer, more attractive place;
9. Protects and enhances the Bakers Arms Conservation Area.

6 Central Waltham Forest

6.1 This chapter sets out the spatial approach applicable to Central Waltham Forest. In this Plan, the borough is divided into three areas: South Waltham Forest, Central Waltham Forest and North Waltham Forest. Each of these parts are made up of thriving places and diverse communities rich in culture and heritage. The divergent character of each area presents different challenges and opportunities requiring a more locally distinctive policy response. The policies in the section should be read in conjunction with other policies in the Local Plan.

Area Profile

6.2 The Central area provides the civic, economic and retail focus of the borough. The area is home to many of Waltham Forest's cultural and creative industries and visitor attractions. The area's potential for good growth is recognised by the Mayor of London and in the London Plan, with the Upper Lee Valley designated as an Opportunity Area at a sub-regional level; including Walthamstow and Blackhorse Lane. The London Plan designates Walthamstow and Wood Street as Strategic Areas for Regeneration. Walthamstow is designated as a Major Centre, with its evening economy being designated of regional importance.

6.3 Central Waltham Forest encompasses the area extending from A406 North Circular to Low Hall Sports Ground and the A104 in the south. It is bounded by Walthamstow Wetlands and the London Borough of Haringey in the west. Epping Forest District Council and the London Borough of Redbridge lie to the east. The A112 runs north to south and broadly splitting the area in half, east to west, with the A503 splitting the borough north to south. To the west is Blackhorse Lane, the borough's designated Creative Enterprise Zone and part of the GLA's Housing Zone. The area is supported by Blackhorse Lane Neighbourhood Centre. To the east is Wood Street District Centre. At the heart of the area is Walthamstow Town Centre, which includes St James Quarter and the Forest Road Corridor. The Forest Road Corridor includes the Town Hall Campus, the civic hub of the borough.

6.4 The area has two London Underground Stations, Walthamstow Central and Blackhorse Road, both on the Victoria Line. There are also five London Overground services from Wood Street, Walthamstow Central and St James Street on the Chingford Line to Liverpool Street; and Queens Road Walthamstow and Blackhorse Road on the Gospel Oak to Barking line. Walthamstow Central also has a bus station serving a key bus network for the borough and North East London, and St James Street has a bus terminus. The area has benefited from investment in new walking and cycle routes together with improvements to the pedestrian environment as part of Enjoy Waltham Forest (through the Transport for London Mini-Holland programme), all of which make the area highly accessible by sustainable means of travel.

6.5 The character of Central Waltham Forest is predominantly Victorian and Edwardian with some interwar and modern development, and a noticeably higher in density than the northern part of the borough. Traditional forms of development along the terrace streets include Warner flats, west of Lloyd Park. Walthamstow Central

transport interchange is the transport focus for the town centre, with retail concentrated around the Town Square with The Mall and the High Street. At one kilometre long, Walthamstow Market is a key retail asset for Walthamstow Town Centre. The street market has recorded as the longest street market in Europe and has an extensive 180 year history and strong local support.

6.6 Hoe Street contains an eclectic mix of independent retailers and is home to the Grade II* listed cinema of Victoria Halls (formerly the EMD Cinema).

6.7 Forest Road connects Epping Forest with Walthamstow Wetlands. Opening up the Town Hall Campus, with its Grade II* listed buildings and grounds, for commercial and residential use alongside the civic function will provide a stimulus for further regeneration along this corridor.

6.8 The vibrant high street feel, indoor market independent small businesses and its street art, make Wood Street a locally distinctive centre, which is a counter balance to Walthamstow Town Centre.

6.9 Blackhorse Lane is an area which has been transformed. It is defined by the new housing led mixed use developments and the creative industries including Blackhorse Workshop, Gnome House and the new developments at Station Hub and Sutherland Road. All supported by public realm and transport improvements, and framed by the waterside setting provided by Walthamstow Wetlands which opened to the public in 2017 following a major National Heritage Lottery Fund restoration project.

6.10 The area is also home to more local, cultural assets such as Walthamstow Village, Ravenswood Industrial Estate, the William Morris Gallery, Lloyd Park and Vestry House. The Feel Good Centre is also an important sporting facility in the borough.



Vision for the Central Area

The Central Area is the civic, creative, economic and retail centre of the borough.

Walthamstow Town Centre will continue to thrive as a vibrant and active Major Town Centre. It will become the primary hub for entertainment, culture and the evening and night-time economy. It will continue to be the focus for retail as well as strengthening its role as a location for employment through the provision of new office and flexible, creative workspace and a suitable location for tall buildings providing new quality homes. St James Quarter will become a new vibrant liveable and workable neighbourhood; a well-connected area with new quality homes, workspace and community facilities, with accessible, safe and well-designed public spaces for people to gather, enjoy and relax.

Retaining its civic function, Waltham Forest Town Hall will become the focus of a transformational cultural redevelopment forming a new, dynamic and active neighbourhood consisting of new quality homes, workspace, shops and public realm. It will act as a catalyst for long-term regeneration of the Forest Road Corridor, creating clear links between Walthamstow Town Centre and Wood Street providing a well-connected network of vibrant centres for local residents and visitors to work, live and enjoy.

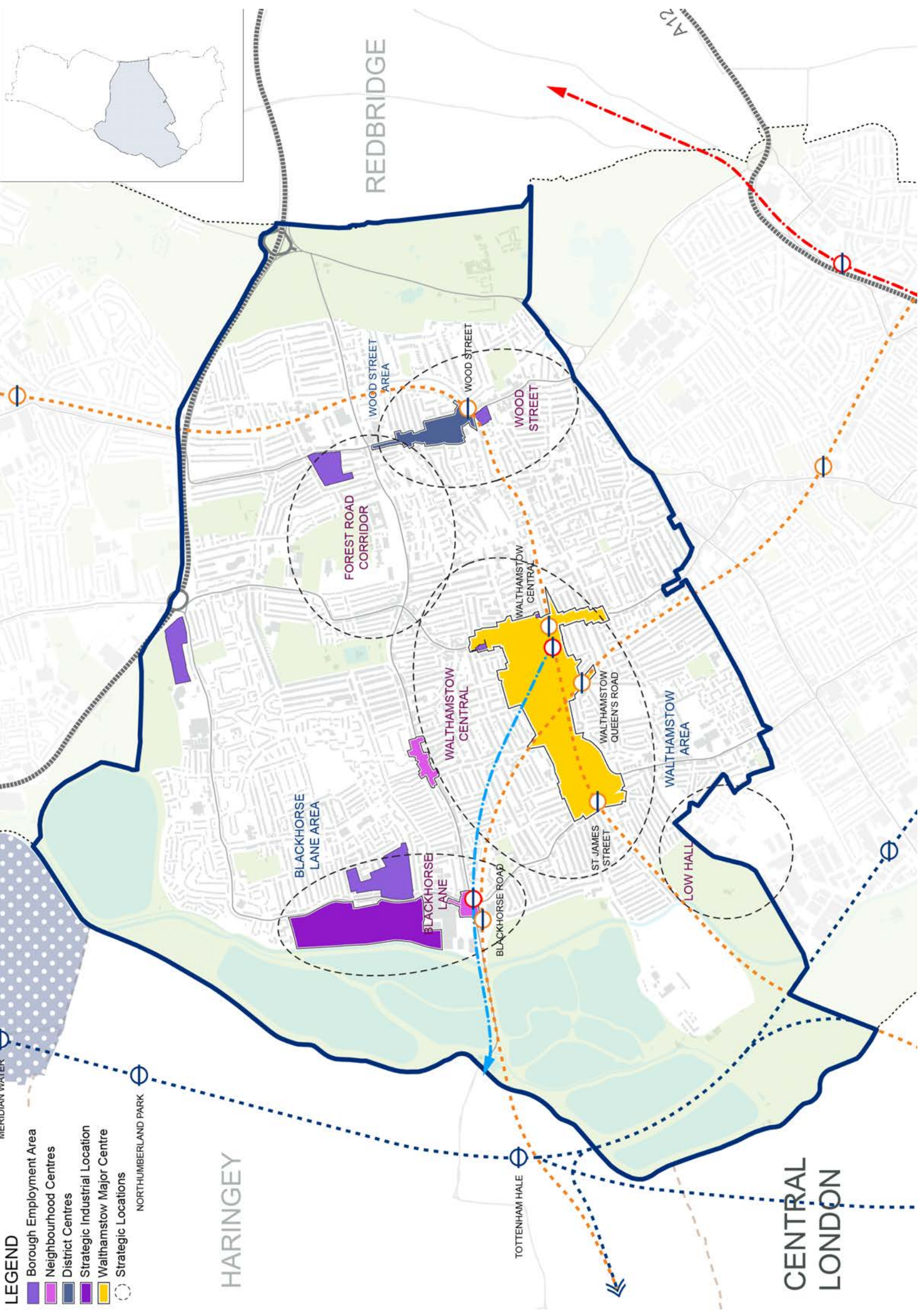
As the Borough's first Creative Enterprise Zone, Blackhorse Lane will continue to support Waltham Forest's creative economy and become a catalyst bringing in new jobs, new quality homes, shops and cafes forming a creative living and working community, alongside the existing and regionally significant light industrial, manufacturing and production uses.

Building on its village feel, Wood Street will become an increasingly attractive destination, serving its growing local population with a diverse range of independent shops and a varied food, beverage and cultural offer.

The function of Walthamstow Village and Ravenswood Industrial Estate will be protected along with support for the growth of the evening economy.

LEGEND

- Borough Employment Area
- Neighbourhood Centres
- District Centres
- Strategic Industrial Location
- Walthamstow Major Centre
- Strategic Locations



6 Central Waltham Forest

Central Waltham Forest

As the civic and creative centre of the borough, proposals in the Central area will be supported where they:

- A. Contribute to the delivery of a minimum of 8,000 new quality homes and 1600 new jobs across the Central Area;
- B. Promote the Walthamstow Town Centre as the creative and economic hub of the borough;
- C. Retain, protect and intensify existing employment land including SIL and BEA, and co-location, where appropriate to support the delivery of a diverse and resilient economy;
- D. Strengthen Blackhorse Lane SIL as a Creative Enterprise Zone and a mixed use liveable and vibrant neighbourhood comprising of new quality homes, employment, retail and social and community infrastructure;
- E. Enable delivery of Waltham Forest Town Hall Campus, as a new liveable neighbourhood delivering new quality homes, new workspace and office space, with supporting community and social infrastructure;
- F. Support the delivery of development along the Forest Road Corridor with the Town Hall Campus acting as a catalyst;
- G. Promote Walthamstow Town Centre as the borough's Major Town Centre and encourage its sustainable and successful growth;
- H. Contribute to promoting the cultural and creative attractions as part of the growing visitor economy, including encouraging a thriving evening economy; and supporting vibrant town centres and high streets;
- I. Promote Walthamstow Central as an important transport interchange in the borough and outer London and support its enhancement;
- J. Ensure that new development and public realm improvements across the area contribute to the delivery of permeable, inclusive connectivity and accessible streets for all;
- K. Encourage improved cycling and pedestrian network across the centre, and new linkages and connections for walking and cycling to Walthamstow Wetlands, Epping Forest, Walthamstow Town Centre, Walthamstow Village, William Morris Gallery and Lloyd Park; and other routes that may be identified in future studies;
- L. Ensure that new developments place-making principles are based on the character of the area, particularly the area's heritage, cultural and green assets including, but not exclusively, Lloyd Park, William Morris Gallery, Town Hall Campus, Walthamstow Wetlands and Epping Forest;
- M. Ensure that new development and public realm improvements enhance the importance of gateway locations. the sense of arrival and accessibility into the borough including all Transport Hubs but in particular Walthamstow Central and St James Street.

6.11 Development and good growth should be based on place-making principles using the character, heritage and culture of the area. The south of the borough has important gateway locations which should be celebrated and create a sense of arrival in the borough.

Development Principles

6.12 Development principles for the strategic locations within this area including Walthamstow Town Centre, Forest Road Corridor, St James Quarter, Forest Road Corridor, Blackhorse, Wood Street as well as other areas are set out below.



Policy 13

Walthamstow Town Centre Strategic Location

Development in the Walthamstow Town Centre Strategic Location over the Plan period will deliver the following priorities:

1. Achievement of minimum growth targets of 3,150 new homes;
2. Higher densities and taller buildings around Walthamstow Central transport hub, St James Street Overground Station and Walthamstow Queens Road Overground Station;
3. Retention of the existing designated Major Centre and its boundary;
4. Establishment of a primary shopping area within the Town Centre boundary and the de-designation of the existing secondary frontage. Application of a

- flexible approach to changes of use (involving A Class Uses) outside the designated primary area. (See Chapter on Distinctive Centres and High Streets);
5. Provision of mix of employment spaces (incubator spaces, accelerator spaces and co-working spaces) as part of mixed-use development;
 6. Development of recreational uses including evening economy activities in cultural quarters at the western and eastern ends of Walthamstow High street;
 7. Improvement to sense of arrival at Walthamstow Town Centre, as a gateway into the borough, particularly at Walthamstow Central transport hub, St James Street Overground Station and Walthamstow Queens Road Overground Station;
 8. Supports mixed use development involving improvements to The Mall shopping centre, provision new housing units, improved town square, and improvements to Walthamstow Central Station;
 9. Protects and enhances the Walthamstow / St James Street Conservation Area;
 10. Improvements to the Walthamstow transport hub, including, but not exclusively the bus station;
 11. Improvements to the Walthamstow Market, particularly in terms of its appearance, function and pedestrian circulation;
 12. Improves public realm and public spaces across the area and walking and cycling accessibility, connectivity, permeability and legibility to enhance a sense of place and encourage dwelling, including upgrading of shopfronts.

Policy 14

Forest Road Corridor Strategic Location

Development in the Forest Road Corridor Strategic Location over the Plan period will deliver the following priorities:

1. Achievement of minimum growth targets of 1,250 new homes;
2. Redevelopment of the Waltham Forest Town Hall Campus area to create a new sustainable mixed-use neighbourhood;
3. Intensification of existing employment floorspace at Walthamstow Business Centre to increase employment floorspace capacity and support the growing economy through the delivery of new office and workspace;
4. Retention of the Bell Corner Local Retail Parade boundary;
5. Place-making principles based on the character and local distinctiveness of the Forest Road Corridor, including heritage, cultural and green assets, pattern and form of development;
6. Protect and enhance the listed buildings at Town Hall Campus;
7. Public realm enhancements to improve pedestrian and cycling access and connection to the Feel Good Centre, Walthamstow Village and Walthamstow Central
8. Improves public realm and public spaces across the area and walking and cycling accessibility, connectivity, permeability and legibility to Feel Good Centre,

Walthamstow Village and Walthamstow Central, as well as other identified routes.



Policy 15

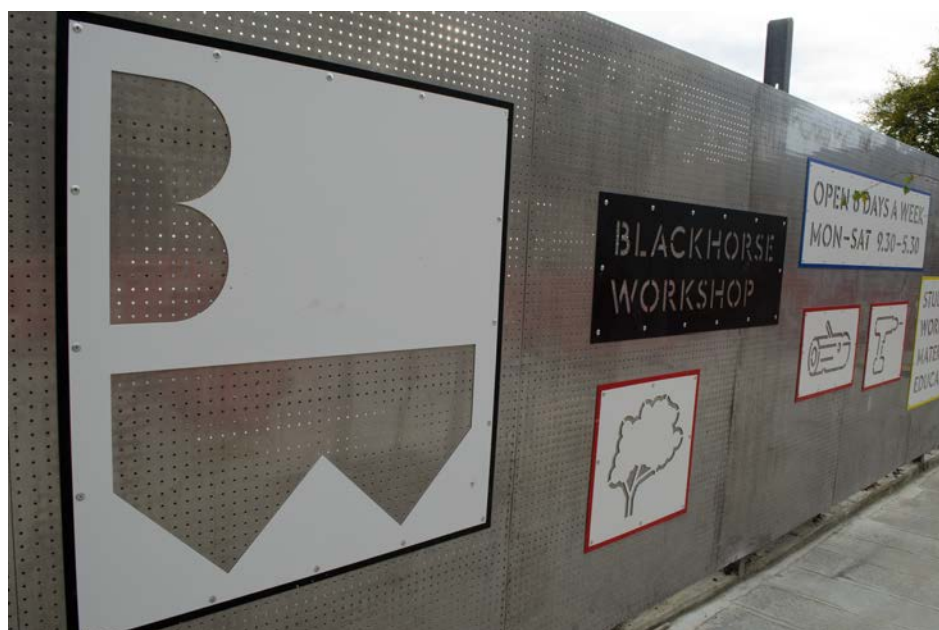
Blackhorse Lane Strategic Location

Development in the Blackhorse Lane Strategic Location over the Plan period will deliver the following priorities:

1. Achievement of minimum growth targets of 1,650 new homes;
2. Designates the area as a Creative Enterprize Zone in line with Draft London Policy HC5;
3. Intensification of the existing employment floorspace;
4. Develops, enhances, protects and manage new and existing creative workspace, providing flexibility for changing business needs, and an attractive business environment including related ancillary facilities, including providing affordable workspace;
5. Redevelopment of existing employment land at the Uplands Business Park area to create a new sustainable neighbourhood, providing high density employment-led mixed use development with Light

6 Central Waltham Forest

- Industrial/Manufacturing/Production space, workspace and appropriate cultural uses; alongside new quality homes;
6. Improvement and enhancement of visitor and cultural attractions of Blackhorse Lane area including Walthamstow Wetlands, Blackhorse Workshop and Gnome House and supports the development of new cultural venues with the area;
 7. Encourages the temporary use of vacant buildings (including heritage assets) and sites for creative workspace and activities;
 8. Retention of the Blackhorse Neighbourhood Centre boundary;
 9. Place-making principles based on the character and local distinctiveness of Blackhorse Lane, including heritage, cultural and green assets;
 10. Improves public realm and public spaces across the area and walking and cycling accessibility, connectivity, permeability and legibility to Lee Valley Regional Park, Walthamstow Wetlands, Town Hall Campus and St James, as well as other identified routes;
 11. Improves the sense of arrival Blackhorse Lane, as a gateway into the borough, particularly at junction of Forest Road/Blackhorse Lane.





Policy 16

Wood Street Strategic Location

Development in the Wood Street Strategic Location over the Plan period will deliver the following priorities:

1. Achievement of minimum growth targets of 550 new homes;
2. Intensification of existing employment floorspace to increase employment floorspace capacity and support the growing economy through the delivery of new office and workspace;
3. Retention of the existing designated district centre boundary;
4. Establishment of a primary shopping area within the District Centre boundary and the de-designation of the existing secondary frontage. Application of a flexible approach to changes of use (involving A Class Uses) outside the designated primary area. (See Chapter on Distinctive Centres and High Streets);
5. Protect and enhance of Wood Street Indoor Market as a distinctive retail and cultural heart for the District Centre;
6. Improves public realm and public spaces across the area and walking and cycling accessibility, connectivity, permeability and legibility to Epping Forest, South Chingford District Centre and Sewardstone Road Neighbourhood Centre,

as well as other identified routes; as well as providing step-free access at Chingford Station;

7. Apply place-making principles that reflect the character and local distinctiveness of Wood Street, particularly taking advantage of the heritage, cultural and green assets.



7 North Waltham Forest

7.1 This chapter sets out the spatial approach for North Waltham Forest. In this Plan, the borough is divided into three areas: South Waltham Forest, Central Waltham Forest and North Waltham Forest. Each of these parts are made up of thriving places and diverse communities rich in culture and heritage. The divergent character of each area presents different challenges and opportunities requiring a more locally distinctive policy response. The policies in this section should be read in conjunction with other policies in the Local Plan.

Area profile

7.2 The north of Waltham Forest encompasses the area extending from the North Circular to Epping Forest in the north, bounded loosely by the River Lee and The Ching. This part of the borough includes three designated Town Centres, Highams Park, Chingford Mount and North Chingford, providing a focus for growth, in addition to Neighbourhood Centres in Sewardstone Road, Chingford Mount and Hatch Lane. The potential of the area for significant regeneration and cultural and creative good growth is recognised by the Mayor of London and in the London Plan, with the Lower and Upper Lee Valley designated as Opportunity Areas at a sub-regional level and Highams Park designated as a Strategic Area for Regeneration. In addition, the area contains the borough's first neighbourhood plan area in Highams Park. Beyond London, at a wider regional level, the North of the borough is located within the UK Innovation Corridor.

7.3 The A406 North Circular runs east to west through the borough, broadly splitting it in half. By area, this makes the north of Waltham Forest the largest of the borough's sub areas, stretching up from the Banbury Reservoir and the south side of the North Circular as far as the boundaries with Epping Forest District Council to the North. To the south of the North Circular, the area connects to the most significant area of growth in the borough, moving along the Lea Valley from Blackhorse Lane towards Leyton and Stratford. The west is defined by the River Lee and Lee Valley Regional Park (which is Metropolitan Open Land) with the London Borough of Enfield lying further beyond the William Girling and George V reservoirs. To the east is the London Borough of Redbridge.

7.4 The area has two London Overground Stations: Chingford and Highams Park, but is generally less accessible than the south and central areas of the borough. These two stations are located in the respective District Centres, with Chingford station being a gateway to Epping Forest. The area also has a third District Centre at Chingford Mount which is accessible by road and has a bus interchange at its centre. To the south and west the area is defined by the North Circular, reservoirs, industrial land and out of town retail.

7.5 Longer term, though with some obstacles to be overcome, Crossrail 2 has great potential to improve connectivity in the area with opportunities to unlock the potential of development sites – particularly in the areas of Chingford adjacent to the North Circular, Sewardstone Road and other North Circular sites where the Borough meets major potential planned development in Enfield at Meridian Water.

7.6 Overall, the character of the north is generally suburban and lower density compared to the Central and South areas of the borough. The area is characterised by semi-detached houses and terraces with some larger detached properties. These are generally a mix of inter-war, Victorian and Edwardian homes often on larger plots including front and rear gardens. The Chingford Hall Estate which abuts the North Circular is an exception. Dating from the early 1990s, the estate has potential for renewal, and with it the possibility of establishing linkages to Meridian Water which would facilitate the flow of positive regenerative effects through the north of Waltham Forest and aid in redressing the extent of severance in the urban fabric of this corner of the borough.

7.7 Overall, the north is burgeoning with opportunities for housing, employment and cultural growth. It is a mixed area of relatively low density residential housing, employment land, retail. Epping Forest and the borough's fringe of Green Belt are major green assets which give this part of the Borough an exceptional character. In the context of future development in the south of the borough and planned schemes emerging in adjacent boroughs, the area offers opportunities to improve linkages both within the borough, and with neighbouring areas. To achieve this, the Council is reviewing the integrity of the Green Belt boundaries in the local area with a view to de-designating brownfield land subject to the conclusions of an updated Green Belt Review.



Vision for the North of the Borough

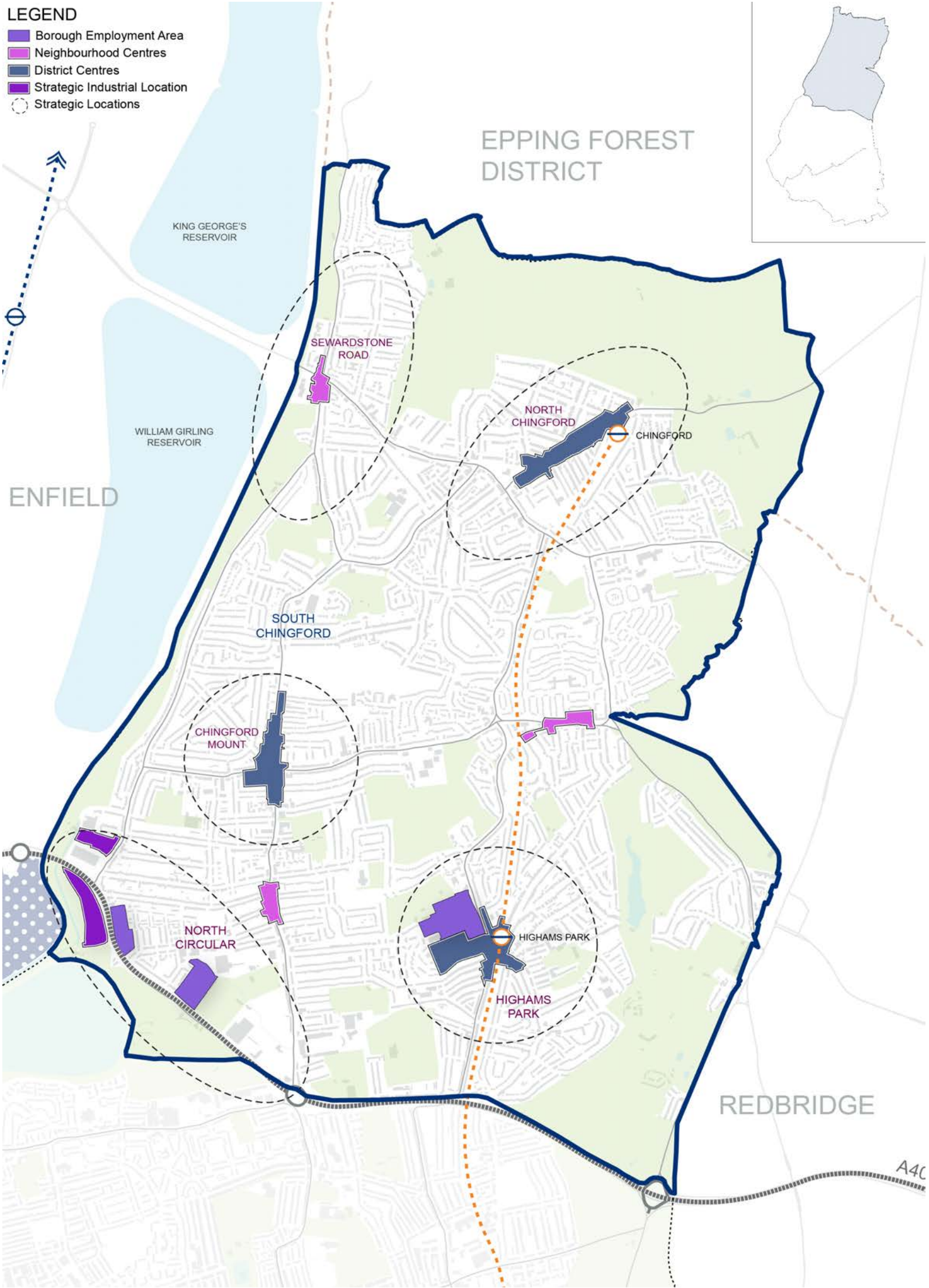
The distinctive areas of North Chingford, Highams Park and Chingford Mount will be enhanced by becoming more attractive, metropolitan, cultural centres with new quality homes and improved public realm. The area adjacent to the North Circular Corridor will provide the opportunities for intensified industrial and employment generating uses supporting the western fringe of the area. In the longer term, these areas will have improved transport access via links to Crossrail 2 stations in Enfield to the west enabling the expansion of the Sewardstone Road neighbourhood centre to incorporate new homes and jobs, flourishing as a new gateway to the borough.

North Waltham Forest will be a thriving network of culturally rich and distinctive town centres integrating both existing and new liveable neighbourhoods. New development will contain a diverse mix of new homes featuring improved public realm, enhanced walking and cycle access and legibility and connectivity. The area will feature new workspace, transport and social infrastructure and reconfigured town centre uses under the umbrella of a flourishing cultural offer for the local community and visitors. The North forms the gateway to Epping Forest and its richly diverse ecology and contrasting natural landscapes. In this setting, the three centres will evolve into vibrant cultural and retail hubs for diverse cultural metropolitan suburbs supported by the dynamic employment environment provided by the North Circular sites and the vibrant district centre of the Hall Lane- Sewardstone gateway.

- LEGEND**
- Borough Employment Area
 - Neighbourhood Centres
 - District Centres
 - Strategic Industrial Location
 - Strategic Locations



EPHING FOREST DISTRICT



Policy 17

North Waltham Forest

Development will be supported in the North as a priority area for targeted and sensitive investment and growth focused in and around the three designated centres and the North Circular corridor by:

- A. Supporting and encouraging the delivery of a minimum of 3,500 new quality homes and 1950 new jobs across the North Area;
- B. Retaining, protecting and intensifying existing employment land, including SIL and BEA, and co-location, where appropriate, supporting the delivery of new jobs, through encouraging intensification;
- C. Enabling the suburban designated centres to diversify and evolve into vibrant mixed use high streets supported by increased population growth;
- D. Encouraging major comparison retail, cultural and leisure investment to the District Centres of Highams Park, North Chingford and Chingford Mount and supporting other centres to provide convenience-based retail investment;
- E. Encouraging an improved cycle and pedestrian network across the North of the Borough, and finding new linkages and connections for walking and cycling to Epping Forest and Lea Valley Regional Park, and improving existing networks;
- F. Managing the appropriate protection of Green Belt and Metropolitan Open land (MOL) and improving access where appropriate.



Development Principles

7.8 Development principles for the strategic locations within this sub-area including North Chingford, South Chingford, Highams Park, Sewardstone Road and North Circular Corridor are set out below.



Policy 18

North Chingford Strategic Location

Development in the North Chingford Strategic Location over the Plan period will deliver the following priorities:

1. Achievement of minimum growth targets of 300 new homes;
2. Retention of the existing designated district centre boundary;
3. Exploring development opportunities Chingford Overground Station area;
4. Development of cultural heart focused at North Chingford District centre capitalising on the role and function of Chingford Assembly Hall and encouragement of additional commercial, cultural and leisure activities, that complements existing uses;
5. Establishment of a primary shopping area within the District Centre boundary and the de-designation of the existing secondary frontage. Application of a flexible approach to changes of use (involving A Class Uses) outside the designated primary shopping area. (See Chapter on Distinctive Centres and High Streets);

6. Improving public realm and public spaces across the area and walking and cycling accessibility, connectivity, permeability and legibility to Epping Forest, South Chingford / Chingford Mount and Sewardstone Road Neighbourhood Centre, as well as other identified routes; as well as providing step-free access at Chingford Station;
7. Apply place-making principles that reflect the character and local distinctiveness of North Chingford, particularly taking advantage of the heritage, cultural and green assets;
8. Protecting and enhancing the Chingford Green Conservation Area.





Policy 19

South Chingford /Chingford Mount Strategic Location

Development in the South Chingford/ Chingford Mount Strategic Location over the Plan period will deliver the following priorities:

1. Achievement of minimum growth targets of 200 new homes;
2. Retention of the existing boundary for South Chingford district centre and Chingford Mount Neighbourhood Centre;
3. Exploring development opportunities around Chingford Mount Road and Old Church Road;
4. Development of a cultural heartspace focused at South Chingford District centre based on the encouragement of additional night-time uses.
5. Establishment of a primary shopping area within the District Centre boundary and the de-designation of the existing secondary frontage. Application of a flexible approach to changes of use (involving A Class Uses) outside the designated primary shopping area. (See Chapter on Distinctive Centres and High Streets);
6. Improving public realm and public spaces across the area and walking and cycling accessibility, connectivity, permeability and legibility to Highams Park, Walthamstow Town Centre and Meridian Water, as well as other identified routes;
7. Place-making principles reflect the character and local distinctiveness of the area, particularly taking advantage heritage, cultural and green assets.



Policy 20

Highams Park Strategic Location

Development in the Highams Park Strategic Location over the Plan period will deliver the following priorities:

1. Achievement of minimum growth targets of 450 new homes;
2. Retention of the existing designated district centre boundary;
3. Exploring development opportunities area at Highams Park Overground Station;
4. Development of cultural heart focused at Highams Park District centre and encouragement of additional cultural and leisure activities, that complement existing uses;
5. Redevelopment of vacant/underused land and properties within the designated centre and elsewhere within the area, including the creation of additional floors to existing buildings (where appropriate), subject to compliance with other policies of the plan;
6. Establishment of a primary shopping area within the District Centre boundary and the de-designation of the existing secondary frontage. The application of a flexible approach to changes of use (involving A Class Uses) outside the designated primary area. (See Chapter on Distinctive Centres and High Streets);
7. Improving public realm and public spaces across the area and walking and cycling accessibility, connectivity, permeability and legibility across the Highams

Park area, in addition to South Chingford/ Chingford Mount and Walthamstow Town Centre, the Town Hall Campus, as well as other identified routes;

8. Apply place-making principles that reflect the character and local distinctiveness of Highams Park, particularly taking advantage of the Highams Area of Special Character, cultural and green assets.



Policy 21

Sewardstone Road Strategic Location

Development in the Sewardstone Road Strategic Location over the Plan period will deliver the following priorities:

1. Achievement of minimum growth targets of 450 new homes;
2. Focusing new development to the area of Kings Head Hill/Sewardstone Road junction;
3. Expanding the boundary of Sewardstone Road Neighbourhood Centre;
4. Improving public realm and public spaces across the area and walking and cycling accessibility, connectivity, permeability and legibility to Ponders End, North Chingford District Centre and South Chingford / Chingford Mount, as well as other identified routes;

5. Apply place-making principles that reflect the character and local distinctiveness of the area, particularly taking advantage of the heritage, cultural and green assets;
6. Improvement to sense of arrival at Sewardstone Road, as a gateway into the borough.

Policy 22

North Circular Corridor Strategic Location

Development in the North Circular Corridor Strategic Location over the Plan period will deliver the following priorities:

1. Achievement of minimum growth targets of 900 new homes;
2. Provide opportunities to link to the neighbouring large scale regeneration and infrastructure investment at the adjoining Meridian Water, London Borough of Enfield;
3. Retain existing employment land (both SIL and BEA) to provide a net increase in jobs through intensification, co-location and renewal;
4. Explore the potential for mixed use intensification of retail areas along the corridor;
5. Review the integrity of the Green Belt boundaries along the corridor with a view to de-designating brownfield land subject to the conclusions of an updated Green Belt Review;
6. Strengthen the character and identity of the A406 corridor through design improvement measures for better safety, functional and effective connections with local places, activity hubs and communities;
7. Improve public realm and public spaces across the area and walking and cycling accessibility, connectivity, permeability and legibility to Meridian Water and South Chingford District Centre, as well as other identified routes;
8. Explore leisure opportunities around and at Banbury Reservoirs;
9. Improve sense of arrival at this strategic location as a gateway into the borough;
10. Explore opportunities for infill development and estate renewal at Chingford Hall Estate.

8 Decent Homes for Everyone

Strategic Objective

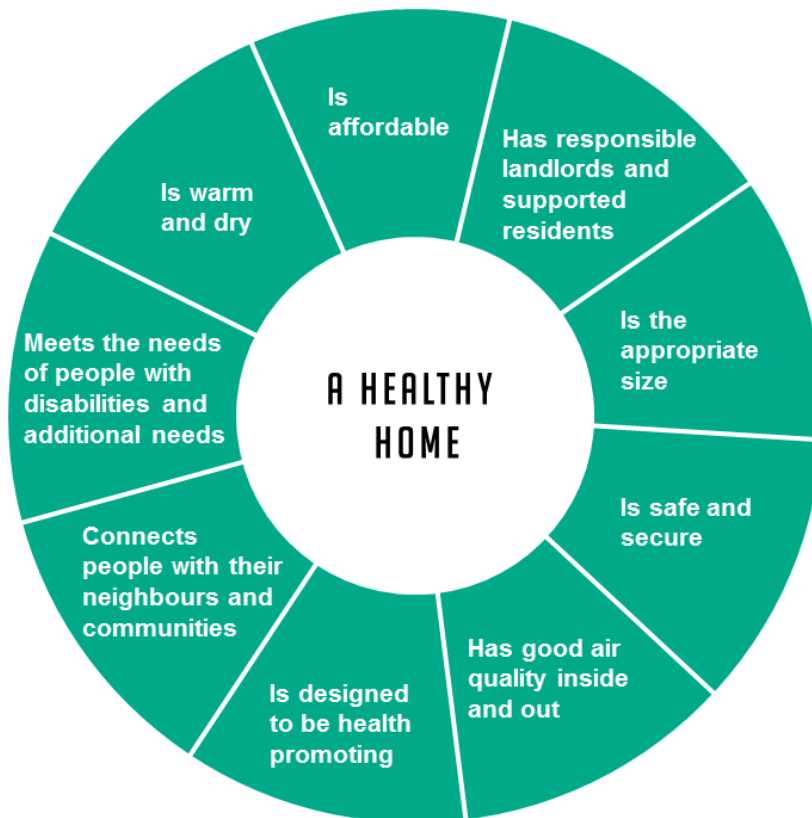
Ensure a significant increase in the supply, choice and mix of high quality new homes, in particular delivering genuinely affordable homes to enable and encourage residents to stay in the Borough and strengthen communities.

8.1 With Waltham Forest's population set to grow over the plan period, increasing the delivery of good quality, genuinely affordable homes to meet existing and future residents needs is a priority for the borough and this plan. The borough's objectively assessed housing need requirement is 1,800 a year, which is the same as the housing target set for Waltham Forest by the Draft London Plan. Waltham Forest's housing target is 18,000 over a 10 year period and 27,000 over a 15 year period. A significant proportion of these new homes need to be genuinely affordable for existing and future residents. The challenge in meet this need is recognised, but also seen as an opportunity to provide residents with a decent roof over their head decent home; and will be met by building homes, communities and places were people want to live and aspire to stay.

8.2 Policies in this chapter should be read alongside the Waltham Forest's Housing Strategy 2019-2024, Housing Futures: A Decent Roof for All. The Housing Strategy sets out the key objectives for housing in the borough, which the this plan will be instrumental in achieving, these are:

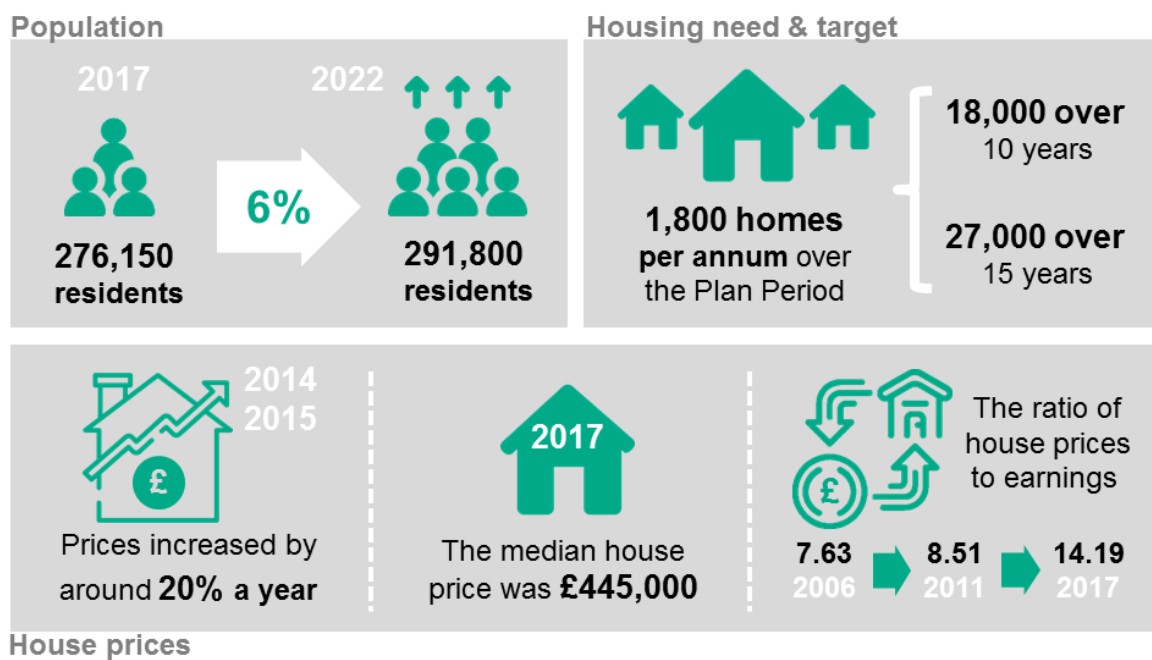
- Supporting growth and aspirations within the borough
- Tackling and preventing homelessness
- Ensuring, decent, safe and health homes
- Thinking Family Think Housing Think Work: inclusive and sustainable neighbourhoods

8.3 The Housing Strategy focuses on the importance of well designed and healthy homes. The Joint Needs Strategic Needs Assessment has defined what a 'A Health Home' is, as shown in the figure below.



8.4 A health home needs to be affordable, be well designed - meeting the National Housing Space Standards, accessibility requirements and encouraging social interaction. It is important that an increasing in delivery of new homes, that this increases the quality of homes across the borough and the policies in this chapter should take account of the policies in Creating High Quality Places Chapter, London Plan and the Mayor of London's Housing Supplementary Planning Guidance (SPG).





Policy 23

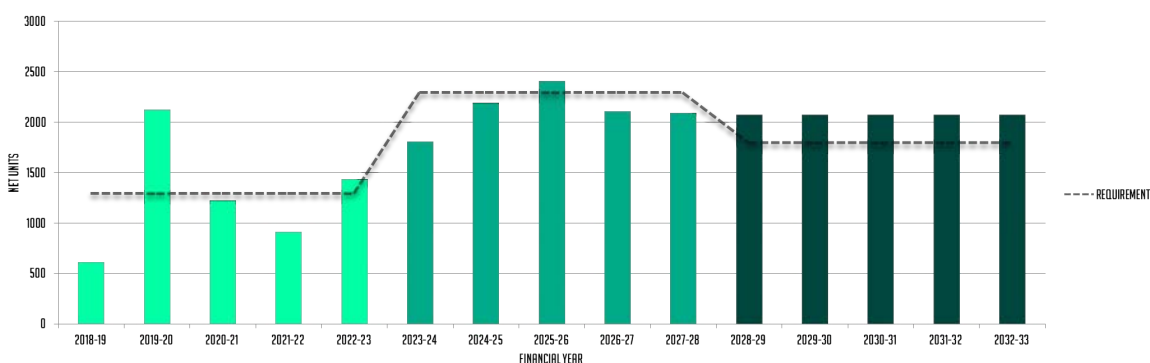
Increasing Housing Supply

Opportunities for housing growth in Waltham Forest will be maximised to deliver a minimum of 18,000 homes by 2030, and 27,000 homes by 2035 by:

- Focusing delivery of new housing in Waltham Forest's Strategic Locations and accessible locations around transport hubs;
- Adopting a stepped housing target, in line with Waltham Forest's Housing Trajectory;
- Seeking to achieve a strategic housing target of 50% genuinely affordable homes across the plan period;
- Maximizing opportunities to increase the supply of additional homes on all suitable, appropriate and available sites including developing brownfield land, surplus public sector land and encouraging residential intensification;
- Making effective and efficient use of land by seeking to optimise housing densities;
- Ensuring new homes address different housing needs and provide a variety of housing choices;
- Supporting the regeneration and renewal of appropriate housing estates through working with partners;
- Support the development of small sites to meet housing need including infill housing development and innovative approaches;
- Resisting the unjustified net loss of residential accommodation.

8.5 Waltham Forest housing target has increased from circa 700 homes per annum in 2011 to 1,800 homes in 2020. The GLA Strategic Housing Land Availability Assessment (SHLAA) and Waltham Forest's Growth Capacity Study 2018 show the borough has enough capacity to deliver 18,000 new homes over 10 years and 27,000 new homes, meeting both the target and the borough's housing need. These assessments demonstrate that Strategic Locations across the borough have significant capacity for new homes by making effective use of land, intensification and increased density. Such opportunities will be explored through Area Supplementary Planning Documents (SPD), Masterplans and Planning Briefs, as set out in Chapter 4 Waltham Forest's Spatial Strategy. In addition to this, new homes will be directed to around transport hubs and accessible locations across the borough. Sites across the borough suitable for new homes will be listed on Waltham Forest's Brownfield Land Register. The Brownfield Land Register will enable Waltham Forest to have an up to date and consistent information on sites for new homes, in a transparent way through publishing as open data.

8.6 The Housing Trajectory is a means of measuring past and future housing delivery. In considering when sites will be delivered in the plan, the Housing Trajectory has been informed by the GLA SHLAA and the Waltham Forest Growth Capacity Study. The Housing Trajectory has indicated that delivery will be stepped (see graph below), Waltham Forest is, therefore, adopting a stepped target. The stepped target is divided into 5 year periods to coincide with considerations of the 5 year land supply and the legal duty for Waltham Forest to review its Local Plan every 5 years. The table below outlines the housing targets, in the first 5 years from 2020 to 2025 this is 1,300 new homes per annum, increasing to 2,300 in 2025 to 2030 when a greater number of sites are expected to come forward. The delivery of the sites will be monitored in Waltham Forest's Authority Monitoring Report (AMR) and Waltham Forest's Housing Delivery Test Action Plan (HDTAP).



Term	Years	Annual Delivery Target
Short	2020-2025	1300
Medium	2025-2030	2300
Long	2030-2035	1800

8.7 Genuinely affordable housing is homes which meet the needs of households whose incomes are not sufficient to enable them to buy or rent housing on the open market. Waltham Forest has a high level of affordable housing need. The Strategic Housing Market Assessment (SHMA) has estimated that the need for the borough is 69% across the 15 year plan period. Given the significant level of need and the difficulties local residents have in accessing the housing market, Waltham Forest seeks to prioritise the delivery of affordable housing and has set a strategic affordable housing target of 50% across the plan period, the approach to this is set out in Policy 24 Delivering genuinely affordable housing.

8.8 In meeting housing need opportunities to maximise appropriate and available sites for housing will be encouraged, through optimising housing densities, encouraging residential intensification, supporting the development of small sites, developing surplus public sector land and considering appropriate estate regeneration and infill. The unjustified net loss of residential accommodation will also be resisted

Policy 24

Delivering genuinely affordable housing

The delivery of genuinely affordable housing will be achieved by:

- A. Achieving a strategic housing target of 50% of all new homes to be genuinely affordable across the Plan period;
- B. Following the Mayor of London Threshold Approach:
 - i. Fast Track Route Privately Developed Sites: Allowing a minimum of 35% affordable housing;
 - ii. Fast Track Route Publicly Owned Sites: 50% affordable housing;
 - iii. Fast Track Route Industrial Land: 50% affordable housing;
 - iv. Viability Tested Approach: where the fast track routes have not been followed, viability appraisals will be required to be submitted in line with the London Plan and the Affordable Housing and Viability SPG.
- C. Requiring new residential developments to maximise opportunities to deliver genuinely affordable housing on-site;
- D. Allowing off site affordable housing or payments in-lieu only in exceptional circumstances where it would secure better outcomes in meeting the borough's housing need;
- E. Seeking affordable housing contributions from alternative housing products and developments such as build to rent, purpose-built shared housing (e.g. co-living), supported and specialist housing and purpose built student housing;
- F. Seeking affordable housing contributions on sites of 10 units or less.

8.9 Genuinely affordable homes includes social rent, London affordable rent, London Living Rent and London Shared Ownership:

- **Social Rent and London Affordable Rent** are for households on low incomes where rent levels are based on the formulas in the Social Housing Regulator's Rent Standard Guidance. London Affordable Rent homes are capped at a benchmark levels published by the GLA.
- **London Living Rent** offers is intermediate housing product, which offers lower rents than market rents. These rents vary by ward across London and Waltham Forest.
- **London Shared Ownership** is an intermediate ownership product which allows first time buyers to purchase a share in a new home and pay a low rent on the remaining, unsold, share.

8.10 The borough has a high level of need for genuinely affordable homes, to meet this requirement Waltham Forest has a strategic affordable housing target of 50%. To achieve this target, Waltham Forest supports the Mayor of London Threshold Approach to Affordable Housing. Where the fast track route is followed, in line with the requirements set out in the London Plan and the Affordable Housing and Viability SPG, no viability assessment will be required. All other situations will be assessed under the Viability Tested Approach and require the submission of a viability assessment to be assessed by the Council's appointed viability assessor and where an application is referable to the Mayor of London, it will be assessed by the GLA's viability assessors.

8.11 Affordable housing will be first sought on-site and opportunities to deliver this will be maximised. However, in exceptional circumstances which can be demonstrated, affordable housing may be allowed to be delivered off site on another site, or a donor site, where this is not possible an a payment in lieu may be acceptable.

8.12 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 Draft London Plan.

8.13 Many of the new homes in Waltham Forest are delivered on small sites and are on sites of 10 units or less, with affordable housing need so high in the borough, these sites will be expected to provide affordable housing contributions which will be set out in an updated Affordable Housing and Viability Supplementary Planning Document (SDP).

8.14 The policy should be read alongside relevant policies in the London Plan, including but not exclusively Policy H5 'Delivering affordable housing' and Policy H6 'Threshold approach to applications'.



Policy 25

Affordable Housing Tenure

The following affordable housing tenure split will be expected on schemes over 10 units:

Tenure	Split
Low cost affordable rent	70%
Intermediate housing products	30%

8.15 The Draft London Plan Policy H7 'Affordable Housing Tenure' states that residential development should apply a split of:

- a minimum 30% low cost rented homes
- a minimum 30% intermediate homes

8.16 Both the GLA SHMA and Waltham Forest SHMA show that there is a significant need for low cost rental housing and because of this the remaining 40% affordable housing tenure is expected to be for low cost rented homes. Delivery of low cost rental housing will be the priority unless there are exceptional circumstances. There is still a strong need for intermediate housing products which is reflected in the policy. To follow the Fast Track Route, applicants will be expected to follow this tenure split in line with Draft London Plan Policy H6 'Threshold approach to applications'.

Policy 26**Housing Size and Mix**

A diverse range of housing will be supported by:

A. Providing the following mix of dwelling sizes across all tenures:

Bedroom Size	1 bed	2 bed	3 bed plus
Preferred dwelling mix – Social Rent / London affordable rent	20%	30%	50%
Preferred dwelling mix – London Living Rent / Shared Ownership	20%	40%	40%
Preferred dwelling mix - Market	20%	30%	50%

Table 8.1

B. Allowing variations to the dwelling size mix where it can be fully justified based on the tenures and type of housing proposed, site location, area characteristics, design constraints, scheme viability; and where shared ownership is proposed, the ability of potential occupiers to afford the homes proposed.



8.17 Ensuring a selection of housing types and tenures are built is important to Waltham Forest to meet the housing needs of its diverse population. There is a need for a range of dwelling sizes and tenures. The priorities for dwelling size and tenures are based on the Strategic Housing Market Assessment and the borough's housing waiting list.

Policy 27**Housing Design**

- A. Proposals for new homes are required to meet the minimum Nationally Described Space Standards for internal spaces
- B. Proposals for new homes are required to meet the minimum external space standards
 - i. All homes, including flatted development, should have access to an element of private space. Balconies will count towards private amenity space;
 - ii. The role and function of each space is clear and that the boundaries between these different types of space are clearly defined;
 - iii. The external amenity space should be well-designed, appropriately located and usable. External amenity space should not be steeply sloping, awkwardly shaped or very narrow;
 - iv. The communal external amenity space is easily accessible by all residents of that development. Communal external amenity space can be provided in the form of green roofs and roof gardens;
 - v. Where external amenity space standards cannot be provided on-site the Council may require financial contributions towards enhance or upgrade the provision of local open space(s) in the vicinity of the development; and
 - vi. The calculation of external amenity space should exclude footpaths, driveways, areas for vehicle circulation and parking.
- C. Proposals to meet the minimum standards as set out below
 - i. **Houses (terraced, semi detached and detached)** - a minimum of 50 sq.m of private amenity space for one and two bed houses. For houses containing three or more bedrooms, an additional 10 sq.m per bedroom should be provided (e.g: 3 bed house - 60 sq.m and 4 bed house - 70 sq.m)
 - ii. **Flatted Development** - a minimum of 10 sq.m amenity space to be provided per bedroom. (e.g: 2 bed flat - 20 sq.m and 3 bed flat - 30 sq.m). Each flat should provide an element of private amenity space, however the overall provision can be provided in the form of both private amenity space and communal amenity space. Balconies should be a minimum size of 5 sq.m.
 - iii. **Children's Play Space** - Children's play areas should be provided in all developments containing 10 or more child bed spaces. A minimum of 10 sq.m of playspace should be provided as per child bedspace (as per Mayors Providing for Children and Young People's Play and Informal Recreation SPD).

8.18 External amenity space is an integral part of the design. It is important to ensure that all new residential development provides an appropriate minimum amount of outdoor amenity space, 1) to meet the needs of residents, and 2) to ensure that the space is of a suitable qualitative standard that allows for a variety of amenity space functions. The provision of external amenity space has a significant impact on people's physical and mental health, for example, through ensuring that new residential development provides sufficient outdoor amenity space to meet the needs of its residents and offer a high quality living environment and ensuring houses provide sufficient outdoor garden space for children to play. Outdoor amenity spaces, particularly gardens also help reduce the urban heat island effect. Balconies will count towards private amenity space and are often of greater value in terms of privacy and usability than communal areas. Communal external amenity space can be provided in the form of green roofs and roof gardens.



Policy 28**Accessible and Adaptable Housing**

Developments will be expected to provide high quality, accessible homes by:

- A. Encouraging functional, adaptable and accessible spaces design in all housing developments;
- B. Expecting all self-contained homes to meet the nationally described space standard, at a minimum;
- C. Requiring a minimum of 90% of all new-build self-contained homes to be accessible and adaptable in line with Building Regulation M4(2);
- D. Requiring a minimum of 10% of new-build self-contained homes to be suitable for occupation by a wheelchair user or easily adapted for occupation by a wheelchair user in accordance with Building Regulation M4(3).

8.19 It is important to ensure that new housing is accessible to all and is adaptable to the changing needs of residents throughout their lives. Housing developments which consider inclusive design and accessibility issues at an early stage of and throughout the development process are the most successful at achieving this. Accessible housing allows residents of the borough to live dignified and independent lives. Wheel chair user dwelling should be distributed throughout a development to provide a range of aspects, floor level locations, views and unit sizes. This policy should be read in-conjunction with Draft London Plan Policy D5 'Accessible housing'.

Policy 29**Redevelopment and intensification of existing housing and housing estates**

The efficient use of existing land for housing will be delivered by:

- A. Increase the overall supply of new homes including genuinely affordable homes;
- B. Requiring any loss of housing to be replaced by new housing at existing or higher densities with at least the equivalent level of overall floorspace;
- C. Exploring opportunities for estate regeneration and renewal, where appropriate;
- D. Providing at least the identical or equivalent level of affordable housing floorspace;
- E. Increasing the design standards, quality, accessibility and safety of the existing housing.

8.20 The redevelopment and intensification of existing housing and housing estates is critical in meet the borough's housing needs. It is important that such schemes increase the number of homes, ensure that affordable homes are not lost and provides a range of tenures. There are opportunities also to increase the standard of the

homes in their design, accessibility and safety, as well as improving the local areas environmental quality. This policy should be read in-conjunction with other policies in this Chapter but also in Creating High Quality Places.

Policy 30

Other forms of housing

Schemes for other forms of housing will be supported where:

- A. They meet the definitions of Build to Rent, Purpose Built Student Housing and Purpose Built Shared Living Housing;
- B. They contribute towards mixed, balanced and inclusive neighbourhoods and communities;
- C. They are located in areas of good transport accessibility and well connected to local services;
- D. They provide affordable housing contributions, in accordance with the Draft London Plan Policy H13, H17 and H18, ;
- E. They are of high quality design including size of units and accessibility.

8.21 Non- traditional housing can make a positive contribution to providing a wider range of housing choices for resident, meeting identified needs and contribute to increasing housing supply. Waltham Forest defines non-traditional housing Build to Rent, Purpose Built Student Accommodation and Purpose Built Shared Living, the definitions of these are provided in the table below.

Non-Traditional Housing Type	Definition
Build to Rent	<ul style="list-style-type: none"> • The development, or block or phase within the development, has at least 50 units. • Homes are held as Build to Rent under a covenant for at least 15 years. • Clawback mechanism is in place that ensure there is no financial incentive to break the covenant. • All units are self contained and let separately. • There is unified ownership and unified management of the development longer tenancies (three years or more) are available to all tenants. These should have break clauses for renters, which allow the tenant to end the tenancy with a month's notice any time after the first six months. • The scheme offers rent and service charge certainty for the period of the tenancy, the basis of which should be made clear to the tenant before a tenancy agreement is signed, including any annual increases which should always

Non-Traditional Housing Type	Definition
	<p>be formula-linked there is on-site management, this does not necessarily mean full-time dedicated on-site staff, but all schemes need to have systems for prompt resolution of issues and some daily on-site presence.</p> <ul style="list-style-type: none"> Providers have a complaints procedure in place and are a member of a recognised ombudsman scheme. Providers do not charge up-front fees of any kind to tenants or prospective tenants, other than deposits and rent-in-advance.
Purpose Built Student Accommodation	<ul style="list-style-type: none"> Primarily occupied by students and managed by an education institution or independent provider for that purpose; Restricted to occupation by students during term-time; Let to each student for the full duration of all terms in the academic year, and not less than the full duration of one term. Provides some common/ communal facilities/ and or services.
Purpose Built Shared Living	<ul style="list-style-type: none"> A development or block or phase within a development must be at least 50 units. communal facilities and services are provided that are sufficient to meet the requirements of the intended number of residents and include at least: <ul style="list-style-type: none"> convenient access to a communal kitchen outside communal amenity space (roof terrace and/or garden) internal communal amenity space (dining rooms, lounges) laundry and drying facilities a concierge community management, and bedding and linen changing and/or room cleaning services Tenancies for a minimum of 3 months. Under single management, with a management plan provided.

8.22 It is important that these non-traditional housing schemes are located near services and transport. In addition, the delivery of these types of new homes should not lead to a reduction in the quality of accommodation and such schemes will be expected to be of high quality. This policy should be read alongside the Draft London

Plan Policies H13, H17 and H18 these will be supported and encouraged where they are of high quality design and provide and contribute towards genuinely affordable housing.

Policy 31

Small Sites

Development of small sites for new homes will be supported by:

- A. Supporting the 'presumption in favour of small sites';
- B. Infilling, intensifying and remodelling areas of existing housing;
- C. Encouraging innovative approaches to housing delivery;
- D. Supporting residential intensification within 800 metres of a town centre and where there is adequate public transport accessibility (PTAL 3 - 6).

8.23 Small sites will play an important part in meeting the borough's housing needs and target. Increasing the rate of housing delivery from small housing sites is a priority. Small sites are defined as below 0.25ha. The delivery of small sites will be achieved through incremental intensification of existing residential areas and town centres, or in areas with adequate public transport accessibility, which is consider to be PTAL 3 to PTAL 6. Additional guidance in the form of Design Codes and SPDs may be produced to assist with the accelerated delivery of such sites.

Policy 32

Housing in Multiple Occupation (HMO) and Conversions

- A. The conversion of a larger home(s) to smaller self contained homes (C3), Houses in Multiple Occupation (C4) and Buildings in Multiple Residential Occupation (Sui Generis) will not be allowed where:
 - i. it has a gross original internal floor space of less than 124sqm;
 - ii. it will result in the over concentration of conversions in one street or in the wider local area;
- B. Conversions of homes that have a gross original internal floorspace of more than 124 sqm will only be permitted where:
 - i. Provides at least one larger family sized home of 74sqm (3 bed plus
 - ii. It is of high quality design standard
 - iii. it is car free
 - iv. adequate cycle parking is provided on site
 - v. it is close to public transport (PTAL 3 and above)

- vi. it provides good refuse and storage facilities
- vii. it includes appropriate outdoor or amenity space

C. Conversions of homes that have a gross original internal floorspace of more than 124 sqm into HMOs will only be permitted where:

- i. it is car free
- ii. adequate cycle parking is provided on site
- iii. it is close to public transport (PTAL 3 and above)
- iv. it provides good refuse and storage facilities
- v. it includes appropriate outdoor or amenity space.

8.24 HMOs comprise of small shared welling 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.

Policy 33

Downsizing

Self contained flats suitable for those aged 55+:

- A. All developments of 150 dwellings or more in suitable locations;
- B. Where there is need identified by the Council, or by the developer;
- C. Ensuring the delivery of appropriately sized and well-designed units in suitable locations with good access to public transport, close to local amenities for older residents wishing to downsize.

8.25 The borough is facing demographic change over the next 15 years, and residents are due to live for longer. Some older residents may wish to downsize, move closer to family or friends or be closer to services and facilities, but they may not want to move into specialist older persons housing. Waltham Forest recognise the important role that new, non-specialist residential developments play in providing suitable and attractive accommodation options for older residents, particularly developments in or close to town centres, near to relevant facilities and in areas well-served by public transport. In addition, much of the housing is no longer suitable and allowing residents opportunities to downsize their homes allows them to find appropriate housing, which does not require adaptation. Where people do downsize, it allows for existing homes, usually family sized units, to be bought back on the open market.

8.26 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 150 dwellings. 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.

Policy 34

Supported and Specialist Accommodation

- A. Retention and refurbishment of supported and specialist accommodation will be supported where it meets identified need and is of appropriate design quality;
- B. The delivery of new developments for supported and specialist accommodation will be supported where it:
 - i. It is designed to meet to satisfy the requirement of specific use or group;
 - ii. Proposals meet the definition of supported housing and specialist accommodation
 - iii. Meets the local and strategic housing needs;
 - iv. Is well connected to facilities, social infrastructure, health care;
 - v. Is well served by public transport;
 - vi. Is of high quality design, including accessibility.

8.27 Supported and Specialist accommodation meets a required need in the borough. Retention and refurbishment will be supported where it still meets the needs of residents and is of the appropriate design quality for current or future residents. For new developments, it must meet identified need, be of high quality design and be located in areas that have facilities the residents require and be located close to public transport.

8 Decent Homes for Everyone

Supported and Specialist Accommodation	Definition
Sheltered Accommodation (also referred to as supported housing)	<ul style="list-style-type: none"> Self-contained accommodation specifically designed and managed for older people (minimum age of 55 years) 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 Use Class C3
Extra care accommodation (also referred to as assisted living, close care, continuing care housing)	<ul style="list-style-type: none"> self-contained residential accommodation and associated facilities, designed and managed to meet the needs and aspirations of older people, and which provides 24-hour access to emergency support. A range of facilities are normally available such as a residents' lounge, laundry room, a restaurant or meal provision facilities, classes, and a base for health care workers. Domiciliary care will be available to varying levels, either as part of the accommodation package or as additional service which can be purchased if required. Use Class C3
Residential nursing care accommodation (including end of life/ hospice care, nursing care units and dementia care home accommodation)	<ul style="list-style-type: none"> provides non-self-contained residential accommodation for people who require for whom additional personal or nursing care is essential. Rooms may be private or shared and may provide an ensuite bathroom. Communal facilities are likely to include a dining room and residents' lounge, with meals and personal services routinely provided to all residents. Personal or nursing care is a critical part of the accommodation package at residential/nursing care accommodation. Care homes are unlikely to provide more than 80 bed spaces in total

Supported and Specialist Accommodation	Definition
	<ul style="list-style-type: none"> Use Class C2

Policy 35

Gypsies and Travellers

The borough's Gypsies and Travellers needs will be met by:

- A. Protecting the existing provision of pitches for Gypsies and Travellers at Folly Lane and Hale Banks North;
- B. Supporting intensification of existing sites to provide extra pitches at Folly Lane and Hale Banks North in line with the need set out in the Gypsies and Travellers Needs Assessment.

8.28 There are two Gypsy and Traveler sites in the borough; one at Folly Road and another at Hale Bank North. A Gypsy and Travelers 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 pitches under the national definition in Planning Policy for Travellers Sites. The Draft 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.

Policy 36

Community- Led Housing, Self Build and Custom Build Housing

Schemes for community-led housing, self build and custom build housing projects will supported by:

- A. Ensuring proposals meet the definition of community led housing, self build and custom build housing projects;
- B. Requiring proposals to meet local and strategic housing needs;
- C. Ensuring proposals are compliant with other policies within this Plan, where relevant;
- D. Encouraging proposals on small sites for housing, infill development in estate regeneration; and as part of larger developments;
- E. Seeking the provision of serviced plots of land for self build and custom build housing as part of larger developments of 0.25ha, where appropriate.

8.29 Community Led Housing, Self Build and Custom Build Housing can assist in meeting the borough's housing need and also in providing a wide range of housing choices. Such schemes will be supported, and encouraged on small sites or as part of estate regeneration, and where appropriate as part of larger developments. Waltham Forest has a statutory duty to have a self build register, however, it allows residents to not only register their interest to for self build and custom build plots but also to put themselves forward for development of community-led housing. Definitions are stated in the table below.

Type	Definition
Community Led Housing	<p>Schemes that are genuinely community-led all share three common principles:</p> <ul style="list-style-type: none"> • meaningful community engagement and consent throughout the development process (communities do not necessarily have to initiate the conversation, or build homes themselves); • presumption that the community group or organisation will take a long-term formal role in the ownership • Stewardship or management of the homes • benefits of the scheme to the local area and/or specified community group are clearly defined and legally protected in perpetuity
Self Build and custom build	<p>Where an individual, an association of individuals, or persons working with, or for, individuals or, associations of individuals, build or completes houses to be occupied as homes by those individuals.</p>

9 Building a Resilient and Creative Economy

Strategic Objectives

Grow, promote and diversify Waltham Forest's economy, including its dynamic, cultural, creative and digital sectors and its role in the Upper Lee Valley and wider UK Innovation Corridor, by both supporting and nurturing indigenous growth as well as attracting inward investment.

Improve life chances by improving job opportunities, upskilling residents and providing access to new skills and training opportunities locally and elsewhere, creating wealth in a successful metropolis.

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.

9.2 Waltham Forest has successfully transitioned from a low employment to a high employment borough. Waltham Forest's employment rate is at it's all time high and has exceeded the London and national average. Approximately, 80% of working-age residents are in employment, ranking Waltham Forest 7th out the 32 London Borough's for employment. Despite this, the borough is facing new challenges in relation to employment. Waltham Forest is a low-earning borough, local residents earn 7% less than the average London resident and approximately 40% of employee jobs are estimated to pay less than the London Living wage. Waltham Forest also has a substantial employment gap between white and ethnic minority groups, with only 68% of ethnic minority residents in employment compared to 87% of white residents.

9.3 Waltham Forest's economy is growing and diversifying as new forms of business move into the borough. With the growth in recent years of the creative and digital economy, new creative enterprises are moving to the borough. Providing the right floorspace in the right locations and providing the best employment opportunities for Waltham Forest residents are key priorities for the borough.

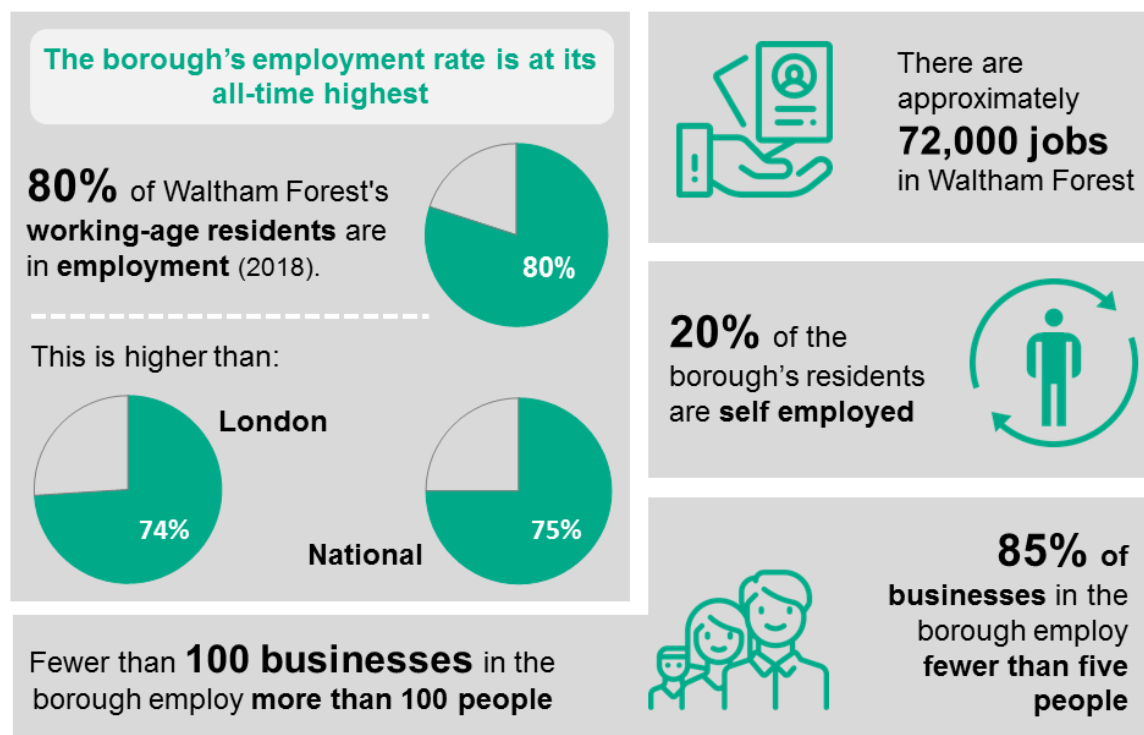
9.4 Waltham Forest's thriving economy comprises of diverse employment sectors. Recognising this, the Waltham Forest Economic Growth Strategy 2015-2020 identifies key sectors within the borough to 'keep, seed and grow'. These sectors are:

- Digital and creative industries
- Construction
- Professional and urban services
- Manufacturing
- Retail
- Health and social care

9.5 The digital and creative sector has flourished in the borough over the last decade, mainly due to the eastward migration of businesses from other London boroughs. Blackhorse Lane SIL has been designated as a Creative Enterprise Zone (CEZ) to support the growth and accommodate current and future creative and digital industries, SME's and start-ups.

9.6 Waltham Forest's current Employment Land Review (2019) indicates a need for a minimum of 46,000 sqm net additional of employment floorspace by 2035 to meet future employment growth needs. These need to be planned for and distributed to the most appropriate locations.

9.7 In recognition of the borough's projected employment floorspace need and diverse economy, Waltham Forest will see an increase of 24,000 jobs by 2035.



Policy 37**Supporting economic growth and jobs**

Opportunities for employment growth in Waltham Forest will be maximised with the aim of providing a minimum of 46,000 sqm of additional employment floorspace during the plan period (2020-2035) by:

- A. Broadening the economic base through the provision of a range of employment floorspace typologies at the most appropriate locations as follows:
 - i. Distribution uses – storage and distribution floorspace, in locations within good proximity of strategic road network;
 - ii. Industrious Space – light industrial (B1c) and the production and distribution of goods (B2) in smaller or sub-divided space within the borough's designated employment sites; and
 - iii. New London Mix – high density office space (B1a) 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.



9.8 Based on the analysis of Waltham Forest's economy and wider markets trends, Waltham Forest's Employment Land Review has identified a need for a minimum of 46,000sqm of employment floorspace by 2033 to support the borough's employment growth.

9.9 It is important to broaden and plan for a diverse economy consisting of a range of

employment types. This will prevent the borough from becoming overly dependent on one employment sector and allow for the provision a range of jobs and employment space for local residents and businesses. Waltham Forest Employment Land Review has identified three main employment typologies; Distribution Uses, Industrious Space and New London Mix as being appropriate in scale, type and design to accommodate the borough's projected employment floorspace need.

Policy 38**Safeguarding Employment Land**

Employment land will be secured to meet the future needs of the economy and to accommodate potential jobs growth by:

- A. Safeguarding and promoting the designated employment areas including Strategic Industrial Locations (SILs) and Borough Employment Areas (BEA) as defined on the Policies Map. In these areas, development will be supported if;
 - i. In designated SIL areas, it secures the following uses:
 - Light Industrial (Class B1c)
 - General Industry (Class B2)
 - Storage and Distribution (Class B8) and
 - Ancillary uses to the above
 - ii. In designated BEA, it proposes:
 - Research and Development (Class B1b)
 - Light Industrial (Class B1c)
 - General Industry (Class B2)
 - Office and workspace (B1a)
 - Storage and Distribution (Class B8) and
 - Ancillary uses to the above; and Hybrid and flexible uses.
- B. Development in both SIL and BEA will be supported where it:
 - i. Increases employment floorspace capacity and there is no loss of employment floorspace;
 - ii. Is of high-quality design and encourages improvements to the poor quality and outdated buildings and infrastructure;
 - iii. Leads to greater intensification to increase floorspace through the provision of new multi-storey units, the sub-division of larger units and where appropriate new smaller units;
 - iv. Ensures efficient use of employment floorspace through good and innovative design;
 - v. Does not disrupt the access and transport connectivity; and
 - vi. Is fitted-out to a standard above shell and core, whilst being flexible and adaptable for different type of uses to meet future needs.



9.10 Strategic Industrial Locations (SIL) are clusters of the borough's industrial land that has been designated in the draft London Plan as being of strategic importance for industrial, manufacturing and logistical uses, and necessary for the function of London's economy. Due to their scale, noise, odours, dust, emissions and hours of operation they sit less comfortably alongside sensitive uses such as housing. In

line with the draft London Plan, Borough Employment Areas (BEAs) are Locally Significant Industrial Sites designated by the council to protect and safeguard employment uses and smaller industrial estates that fulfill an important role in term of local employment and business opportunities.

9.11 The Draft London Plan advocates for no overall net loss of industrial floorspace capacity across the borough's SIL and BEA sites. It is therefore important for Waltham Forest to protect and retain the existing employment floorspace, as well as unlock opportunities to deliver additional floorspace capacity to meet the borough's future employment floorspace need and to support the boroughs existing industrial, manufacturing and production uses.

9.12 Following a national and regional decline, industrial, manufacturing and production uses play an important role in the Waltham Forest's economy and are in need of appropriate locations to support them. In response to the decline of industrial floorspace, the draft London Plan advocates for the efficient use of the boroughs employment land through intensification to deliver additional floorspace capacity. Through regeneration and renewal opportunities, innovate design solutions in the form of new multi-storey buildings and subdivided larger and smaller units will help to boost capacity and create a more compact and intensified employment environment. Similar to what has been achieved in the northern edge of Argall Avenue, intensification and the provision of new high quality units will allow for efficient use of the sites, improvements of existing building stock and accessibility.

Policy 39**Managing Change in Designated Employment Areas**

Proposals for the regeneration of parts or whole areas of designated employment areas (SIL) and (BEA) will be supported where:

- A. The development is part of a co-ordinated masterplan approach agreed or adopted by the Council or in partnership with other stakeholders including the GLA;
- B. In line with the Draft London Plan, efficient use of the borough's SIL and BEA sites could be made through the co-location of employment with other uses that can operate from multi-storey buildings, alongside or mixed with other non-employment uses where appropriate;
- C. The development reinforces the function, role and operation of employment uses and services;
- D. The phasing of the proposed development secures the completion and operation of the employment components of the scheme before first occupation of remaining non-employment uses;
- E. High quality and innovative design approaches can be provided to create a buffer and separation between any heavy or intensive Class B2, B1c, or B8 employment uses or non-conforming uses and adjacent non-employment uses;
- F. Appropriate design mitigations can be provided for the non-employment uses to be accommodated, with regard to the following;
 - i. Safety and security
 - ii. Layout, orientation, access, servicing and delivery arrangements of uses;
 - iii. Design quality, public realm, visual impact and amenity for residents;
 - iv. Vibration and noise;
 - v. Air quality including dust, odour and emissions;
- G. Other mitigation measures (where necessary) are implemented in line with the Agent of Change Principle;
- H. Subject to compliance with all of the above policy tests, suitable non-employment uses for co-location include residential uses (Class C3), Retail (Class A1, subject to compliance with Town Centres & Retailing Policies), Food and Beverages (Class A3) and Community/ Social Infrastructure (Class D1 and D2) and other uses that will serve the needs of the occupiers of such development.

9.13 A coordinated masterplan approach is a two stage process that is developed in collaboration with the Greater London Authority (GLA) and Waltham Forest. The approach seeks to open up opportunities for industrial intensification and co-location to deliver employment led redevelopment and transformation of the borough's existing SIL and BEA where appropriate. As an area specific approach, it should consider

the whole designated SIL and BEA and their surrounding context. It should produce a detailed analysis on the site capacity, access and servicing, decant and phasing, deliverability and opportunities for place-making.

9.14 As an approach to deliver additional industrial capacity and meet the borough's employment floorspace needs, the draft London Plan requires London Boroughs to explore and consider suitable employment sites and industrial uses for co-location. Co-location involves the mix of industrial and appropriate non-industrial uses, through either side-by-side or vertical stacking. This will retain a practical and suitable balance of employment and non-employment activities, while aiding place-making and opportunities to deliver necessary enhancement and renewal.

9.15 Suitable uses for co-location with industrial uses include; Retail (Class A1, subject to compliance with Town Centres & Retailing Policies), Food and Beverages (Class A3) and Community/ Social Infrastructure (Class D1 and D2), residential uses (Class C3) and other uses that will serve the needs of the occupiers of such development. The table below identifies one of the borough's SIL as a suitable employment site for co-location. However, as part of a strategic approach the council will consider other sites or locations as may be justified by evidence.

Site	Size (ha)	London Plan Strategic Industrial Land Area
SIL 3, Blackhorse Lane	21.6	Blackhorse

9.16 The table below identifies 12 of the borough's BEA sites suitable locations for co-location. However, as part of a strategic approach the council will consider other sites or locations as may be justified by evidence.

Site	Size (ha)
BEA2 Highams Park	5.7
BEA5 Sutherland Road	3.5
BEA4 Clifford Road	2.6
BEA19 Hatherly Mews	1.7
BEA22 Barrat Road	0.8
BEA21 East London Office Centre	0.6
BEA7 Heybridge Way	2.1
BEA17 Joseph Ray Road	1.6
BEA1 Howard Road	1.4
BEA14 Montague Road	0.4

Site	Size (ha)
BEA20 Lancaster Road Arches	0.63
BEA12 Sherrin Road	11.9

9.17 To ensure the effective function and operation of employment uses in a co-located or mixed use scheme, it is important that the employment use is completed and in operation prior to the completion of the non-employment use. This will also safeguard and ensure the needs of the employment use are met and not overshadowed by other non-employment components.



9.18 The mixing of employment and non-employment uses could sometimes create adverse conditions for neighbouring occupiers. For example, the provision of new homes and other noise-sensitive development should not result in unreasonable restrictions being placed on existing industrial uses. As a result, the local plan places the responsibility for addressing the impact of noise and other conditions on new development in line with the 'Agent of Change Principle'. This means that where noise sensitive developments are proposed close to existing noise generating industries, the new development must be designed in a way which protects the occupiers from noise impacts, so that existing industrial uses are not threatened. Further to the 'Agent of Change Principle', specific design mitigation's should be adopted to prevent issues relating to the safety, security and layout of employment sites. Measures to reduce and manage the impact to the public realm and air quality should also be adopted especially when located in residential areas and town centres.

Policy 40**Approach to Non-Designated Employment Land**

Non-designated employment Land will be protected as locations for employment by supporting new development that:

- A. Is well designed for employment use and flexible to accommodate a range of appropriate identified future employment growth sectors;
- B. Is of high-quality design and encourages improvements to poor quality and outdated buildings and infrastructure;
- C. Ensures there are no impacts to sensitive non-employment uses, in line with the 'Agent of Change Principle'; and
- D. Is fitted-out to a standard above shell and core, whilst being flexible and adaptable for different type of uses to meet future needs.

In line with Draft London Plan policy E7, the loss of employment floorspace will only be permitted where:

- A. There is no reasonable prospect of the site being retained in employment use;
- B. The development provides opportunities for co-location or mixed-use with other non-employment uses;
- C. The existing use creates significant amenity issues for neighbouring occupiers best remedied by encouraging a replacement non-employment use.

9.19 Outside of the borough's SIL and BEA sites, Non-designated employment sites provide suitable locations for lighter industrial, manufacturing and production uses.

9.20 In recognition of decline in industrial, manufacturing and production industries, the boroughs demand for employment floorspace and changing employment needs, a flexible approach has been adopted for the borough's Non-designated Employment Land as opposed to the borough's SIL and BEA

9.21 To prevent the loss of well performing employment floorspace to residential uses, new developments will be expected to provide sufficient evidence to demonstrate 'no reasonable prospect' of the site being used for employment uses. In implementing this policy, the Council will usually expect a marketing report to be submitted with any planning application involving the re-use or redevelopment of a Use Class B site for an alternative non-employment use. Applicants will be required to provide robust evidence that the relevant employment site or floorspace has been marketed for an appropriate period of time, that the form of the marketing has been appropriate, and that, despite best endeavours, no tenant (or purchaser) interested in using the site or floorspace for employment use cannot be found.

9.22 Due to the changing economy, opportunities for new employment uses may emerge. This policy seeks to ensure that any new employment floorspace is suitable to scale, contributes to place-making, does not disrupt the character and nature of the existing area, and is accessible and well served by public transport.

9.23 The boroughs Employment Land Review (2019) has identified the borough's Non-designated employment sites that are low performing, located in residential areas and in close proximity to public transport as suitable locations for mixed-use co-location. Suitable non-employment uses include; Retail (Class A1, subject to compliance with Town Centres & Retailing Policies), Food and Beverages (Class A3), Community/ Social Infrastructure (Class D1 and D2), residential uses (Class C3) and other uses that will serve the needs of the occupiers of such development. The table below, provides the recommendations for each of Waltham Forest Non-designated employment sites.

Site	Size (ha)	Options
LBWF22 Ravenswood Industrial Estate	0.2	Protect
LBWF9 Skeltons Lane	0.5	Protect, intensification with co-location
LBWF11 Shaftesbury Court	0.3	Protect, intensification with co-location
LBWF14 Lea Bridge GasWorks	2.5	Protect and intensify
LBWF20A New Triangle	2.5	Protect and intensify
LBWF 7 Wood Street Goods Yard	1.08	Protect, intensification with co-location

Policy 41**Offices and workspaces**

The provision of offices (Class B1a) and flexible workspaces for small and medium size enterprises will be supported in the most sustainable locations, in particular in Walthamstow Town Centre, the District and appropriate Neighbourhood Centres. Development proposals will be permitted where they:

- A. Deliver high quality, well-designed flexible and adaptable spaces of different unit sizes and types for a range of uses and occupants with basic fit-out provided to a level beyond shell and core;
- B. Provide low cost and affordable spaces as part of mixed-use development;
- C. In circumstances where on-site provision is not possible, financial contributions for equivalent off-site provision can be secured through a S106 contribution.
- D. Support regeneration initiatives in local areas such as the Blackhorse Lane Creative Enterprise Zone;
- E. Accord with London Plan Policies on the provision of affordable workspaces; and
- F. Are supported by a marketing strategy for the use and occupation of the employment spaces to be delivered in accordance with Policy 48 (C).

9.24 The Draft London Plan encourages improvements to the existing and the provision of new office floorspace. The borough's Employment Land Review identifies Waltham Forest as having the smallest office market in the North East London. The significant loss of office floorspace under Class O permitted development rights has resulted in a low supply of office buildings in the borough.

9.25 Walthamstow Town Centre and the borough's District Centres and some Neighbourhood Centres have been identified as the main destinations for office development. New office development will contribute to the vitality and vibrancy of the boroughs town centres by creating footfall and daytime activity, and will be able to capitalise on the benefits of good public and sustainable transport connectivity via; Enjoy Waltham Forest, London Underground, London Overground and local bus services. As the borough's Creative Enterprise Zone, Blackhorse Lane will continue to be an area for regeneration, with specific investment directed into the provision of new office and low cost and workspace to supporting the areas and existing and emerging creative industries.



9.26 The borough is located within the London-Stansted-Cambridge Innovation Corridor and the growth of start-ups, SME's, creative and digital industries within Waltham Forest will create a demand for suitable office and workspace. Waltham Forest's Employment Land Review has identified a need for the provision of low cost and affordable workspace within the borough to support the growing need for cheaper and low cost space to support start-ups, SMEs and creative and digital industries.

9.27 The sub-division and re-configuration of larger units, to produce smaller units and shared or co-working space is a key example of flexible or adaptable units that will reflect the needs of the borough's changing office market and demand for smaller and cheaper units at rents maintained below market rate. The delivery of new low cost and affordable workspace as part of new mixed-use developments is encouraged by the Draft London Plan and will help to create a healthy mix and opportunities for businesses in need of workspace with cheaper rents or leases. Where affordable workspace cannot be provided as part of a new development, planning obligations may be used to secure affordable workspace in separate locations or part of another scheme.

Policy 42**Creative Enterprise Zone**

In line with the Draft London Plan, proposals supporting the establishment of Creative Enterprise Zones will be encouraged as follows:

- A. In locations that have existing and emerging clusters of creative, digital and cultural industries well connected by public transport;
- B. The proposal builds on existing capacity through the provision of new, flexible and high quality workspace, maker space, studios and small offices;
- C. The proposal provides new high quality low cost and affordable small offices and workspaces in line with Policy 40 (Offices and Workspace);
- D. The development makes use of vacant buildings and premises in temporary or permanent use; and
- E. Contributes to the vitality and vibrancy of nearby employment areas and designated centres.

9.28 Creative, digital and cultural industries play an important role in Waltham Forest's economy. The creative and digital sector has risen from 14% to 19% from 2010 to 2018. The rapid growth has sparked the need to protect and support new and existing creative, digital and cultural industries within the borough, and prevent the loss or displacement of such industries from factors such as high rents, lack of space and changing business needs.

9.29 The designation of Creative Enterprise Zones will help to create a focus for creative, digital and cultural industries within the borough, producing a thriving hub of talent and space to support regeneration aspirations and allow these industries to continue to grow and flourish. Blackhorse Lane has been designated as the borough's first Creative Enterprise Zone. This will provide the necessary protection, support and enhancement of the creative, digital and cultural industries present in the Blackhorse Lane area.

9.30 In line with policy 41 Offices and Workspace, the provision of low cost and affordable workspace to meet the needs of creative, digital and cultural industries is a key priority and will ensure the availability of space to address the rising issues regarding affordability and suitability of space.

9.31 Specific consideration will be given to support opportunities for the use of vacant buildings and premises for temporary and meanwhile uses, providing opportunities for pop-ups and meanwhile uses to help stimulate vibrancy and vitality of the Creative Enterprise its surrounding area and further establish activity.

Policy 43**Local Jobs, Skills and Training**

Economic and employment benefits for local residents and businesses will be secured by:

- A. Requiring all new major developments to adhere to the Employment and Training Toolkit set out in the Planning Obligations SPD by contributing towards employment, skills and training programs, apprenticeships and work placements through S106 agreements to equip residents with the skills required to gain employment;
- B. Supporting the provision of a broad range of employment and training opportunities across a variety of sectors available to local residents, including in the construction and operation phase of new developments;
- C. Supporting the growth of existing and future start-ups, SME's and businesses in key growth sectors.

9.32 One of the borough's key priorities is to ensure Waltham Forest residents have access to skills, training and employment. Working with the borough's employment and skills services and approved partnerships in line with the Waltham Forest's Connecting Communities programme ⁽²⁾, will support local residents to access a variety of training and employment opportunities.



9.33 By harnessing the benefits of economic growth and working with partnerships and training facilities, the borough will seek to ensure that there are a broad range of employment opportunities across a variety of sectors available to local residents. This includes opportunities in both the construction and operation phase of new developments, creating a sustainable balance of

contract, temporary and permanent employment opportunities of various skill levels.

² Funded by the Ministry for Housing, Communities and Local Government (MHCLG) to inspire the people of Waltham Forest to make a positive impact for those around them

9.34 It is important for all Waltham Forest residents to have access to opportunities for training and skill development. The Employment and Training Toolkit and Planning Obligations SPD sets out the structure for the negotiation and compliance of S106 obligations to capture the opportunities of growth and ensure Waltham Forest residents have access to high quality employment across the borough.

Policy 44

Railway Arches

New development in the borough's railway arches will be encouraged by:

- A. Supporting current and future B1a, B1c, B2 and B8 uses, D and A Class uses especially where by station hubs, Town Centres or as part of wider regeneration schemes;
- B. Promoting improvements to the appearance of railway arches through upgrades, active frontages and improvements to public realm;
- C. Supporting development that does not have adverse impact on the railway line;
- D. Ensuring development does not obstruct the public highway and pedestrian public realm;
- E. Ensuring new development adheres adopt suitable design mitigations, in line with policy 38 Managing Change in Designated Employment Areas.

9.35 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 affordable locations for employment activities including office (B1a), light industrial (B1c), General Industrial (B2) and Storage and Distribution (B8) needs.

9.36 There is opportunity to widen the type of uses within in the borough's railway arches to support Retail (A1), Restaurants and Cafes (A3), Drinking Establishments (A4) and Assembly and Leisure (D2) uses 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.

9.37 Some railway arches are located in residential and noise sensitive areas. Similar to the borough's employment sites, it is important for new developments to adopt suitable design measures to avoid impacts and reduce disturbances to sensitive uses, obstruction of public realm and adverse impacts to the railway line.

10 Promoting Culture and Creativity

Strategic Objectives

Ensure that the Borough's cultural legacy and creative economy flourish and grow and investment is secured to improve life chances, quality of life and well-being for all.

10.1 Waltham Forest is an important cultural centre in London and the borough's designation as the first ever Mayor's London Borough of Culture in 2019 is testament to this. The Local Plan therefore plays an important role in ensuring the Council builds a lasting legacy from the opportunity 2019 presents which benefits its culturally diverse population. The Council is preparing a cultural impact strategy around three themes: culture as a bond; culture as identity and culture as the future. The Local Plan's role in delivering this is to ensure that places where culture is produced and consumed are supported, protected and enhanced.

10.2 The creative and cultural economy is an important economic contributor and is growing. Cultural, arts, entertainment and visitor attractions support the vitality and vibrancy of the borough's places. It is also an important part of the community and social infrastructure in the borough as it brings people together encouraging community cohesion and building social capital.



Figure 10.1

10.3 There are a significant number of creatives living and working the borough. These artists, designers and other creative professionals, and the creative industries contribute strongly to the local economy. It is a sector that is supported in the borough, and this policy should be read in conjunction with policies in the Building a Resilient and Creative Economy Chapter.

10.4 Waltham Forest's cultural attractions are not only museums, such as the Vestry, William Morris and Vestry House Museum but important outdoor space such as Lea Valley Regional Park and the Walthamstow Wetlands. There is scope to use outdoor space and public realm for cultural purposes and events. Public art, exhibitions and events plays an important role allowing everyone to have access to culture and these are supported and encouraged.

Policy 45**Promoting Culture and Creativity**

- A. Culture venues will be protected and enhance, development involving the loss of arts, culture and entertainment facilities will be resisted where a continuing demonstrable need exists, unless the facility is re-provided in accordance with other policy requirements in the Plan
- B. New cultural venues will be supported within the borough and directed in the following ways:
 - i. major development of arts, culture, entertainment and visitor facilities directed to major, district centre locations and areas accessible by public transport;
 - ii. Smaller scale proposals will be permitted in areas that are accessible by public transport, walking and cycling routes and by those that are likely to use the facility, including but not exclusive in other designated Cultural Quarters and Creative Enterprise Zones;
- C. Meanwhile cultural uses will be supported in parks, highly accessible areas and town centre locations;
- D. Where appropriate, new and existing social and community infrastructure will be encouraged to offer and the use space for art and cultural event space in line the principles of co-location to ensure efficient use of land;
- E. The use of outside space and the public realm for art, culture, sports and entertainment will be encouraged and supported in accessible areas and town centre locations;
- F. Culture will be supported as part of place making and as part of enhanced and new public realm, including encouraging outside and public realm for arts, culture, sports and entertainment;
- G. Section 106 contributions will be sought for public art including:
 - i. The funding, management, development, implementation and maintenance of public art projects which are part of major development sites; or
 - ii. Financial contributions towards the provision of public art projects located outside of the development site.

10.5 New major developments will need to follow the sequential test and demonstrate why there are not located in a major or district centre. Areas in the borough that are highly accessible by public transport but are outside of major or district centres will also be considered to be appropriate locations for major developments for arts, culture, entertainment and visitor facilities as well as smaller scale proposals.



10.6 Ensuring that land and facilities are used efficiently is important for the borough and will require the dual use of sites for a wider range of uses, including cultural uses. Cultural uses also have the ability to activate vacant units in Town Centre and along High Streets. It will also be expected that social and community infrastructure offer space for arts and culture. There is also an opportunity to use the public realm and outside space for cultural activities especially in parks and Town Centres.

10.7 Public art brings a wide range of benefits and will be encouraged as part of new development, especially where it contributes to a sense of place and positively contributes to the streetscape. It will be used to encourage footfall and support the visitor economy.

Policy 46**Protecting Pubs**

Pubs will be protected as important local assets in the borough. Planning permission will only be granted for the change of use of a public house if all of the following criteria are met;

- A. There would be no resulting shortfall of public house provision;
- B. 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 (Class A4) for a continuous period of at least 12 months.
- C. Where the application site has heritage value (i.e. it is a statutorily or locally listed building, falls within a Conservation Area, or has been identified as a building of importance to the character of town centre areas), the proposed development would have not detrimental effect on the design, character, and heritage of the existing premises or the wider streetscape.
- D. Where the application site is registered as an Asset of Community Value, appropriate and proportionate public consultation has been undertaken by the developer/applicant with the local community.

10.8 Public houses play an important role at the heart of many local communities. They have historically provided social hubs for all manner of communities, including old manufacturing communities, and make a positive contribution to townscape and local identity. Today they provide an important role in promoting community cohesion; offering opportunities for people from different walks of life to mix. More than just a place to relax and drink, they can host events, clubs, and provide informal meeting spaces for local interest groups.

10.9 Public houses also have a strong role to play in supporting the local economy. They can help bring activity and vibrancy to our high streets, and provide employment opportunities, both directly, and indirectly; by supporting food suppliers and brewing industries. Supporting such industries is particularly important given the importance of the food and drinks industry to Waltham Forest. Over recent years local pubs across the borough have been lost. This policy therefore seeks to protect those pubs that exist and also allow for new ones in town centres and other accessible locations, particularly where they provide wider community facilitates.



10.10 Given the value public houses bring to local communities, evidence must be provided that all avenues for retaining them have been exhausted before alternative uses can be considered. Further detail on the the applications of this policy is included in the Waltham Forest Pubs Supplementary Planning Document. With regard to marketing evidence, firstly, evidence should be provided that the existing business is no longer financially viable. Insufficient evidence of attempts to diversify the business may indicate that the public house use could be made viable. As a failing public house may be given a new lease of life under alternative ownership, the Council will require evidence that it has been sufficiently marketed for such use without genuine interest before any alternative uses can be considered.

11 Distinctive Town Centres and High Streets

Strategic Objective

Support Waltham Forest's network of thriving, safe and attractive town centres, maintaining the distinctive role of each and making them accessible to all.

11.1 This section sets out the policies for managing growth and change in town centre uses. The National Planning Policy Framework (NPPF) defines main town centre uses as including retail, leisure, entertainment facilities, recreation uses, offices and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities). In planning for growth, it is necessary to ensure that there is a good choice and range of town centre uses at the most appropriate locations for existing and future residents.

11.2 An assessment of the need for retail floorspace during the plan period (up to 2035) has been undertaken as part of the Waltham Forest Retail & Town Centres Study 2019. This assessment indicates that, when current retail floorspace commitments are taken into account, there is no need to plan for an increase in retail floor space provision up to the period 2029. That said, the Plan encourages local development opportunities for retail and other main town centres uses in individual centres where they are able to maintain and enhance the overall health of a centre.

11.3 Waltham Forest has a well-established network of town centres made up of Walthamstow (as Major Centre), District and Neighbourhood Centres. The borough's network of centres are not just focal points for shopping and services, but also hubs for people to work, live and socialise. In planning for growth, the borough's centres will need to evolve and adapt to meet new challenges and become successful and attractive destinations for shopping, employment, entertainment and leisure activities.



Policy 47

Hierarchy of Centres

The borough's network of centres as identified below will be protected and enhanced in order to provide a sustainable distribution of town centre facilities and services to support local communities. The borough's town centre hierarchy is as follows:

- A. **Major Centre - Walthamstow Town Centre** - This is the Borough's principal and economic hub. 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;
- B. **District Centres – North Chingford, South Chingford, Highams Park, Wood Street, Bakers Arms, Leyton, and Leytonstone.** District Centres will be the primary focus for development and investment in shops, services, leisure and community uses complementing Walthamstow Town Centre. A mix of uses will be supported in centres to ensure the development of vibrant centres which meet the needs of the local communities that they serve; and
- C. **Neighbourhood Centres – Sewardstone Road, Chingford Hatch, Chingford Mount Road, Forest Road, Blackhorse Lane, Markhouse Corner, Francis Road and Thatched House.** These centres will be the focus for smaller scale retail and town centre services and facilities appropriate to their role and function, which is to serve the everyday needs of local communities.
- D. **Local Retail Parades** – These form the lowest tier in the hierarchy and consist of small clusters/parades of shops containing at least five units which serve their immediate catchment area for local convenience shopping needs. These are defined on the Policies Map. Their role in providing local neighbourhood shopping and supporting facilities will be protected.

11.4 The NPPF requires Local Plans to define a network and hierarchy of centres that is resilient to anticipated economic changes. This policy accords with the NPPF and the London Plan by defining the centres within Waltham Forest's town centres hierarchy and setting out the locational priorities for directing growth to individual centres in the hierarchy. It is also necessary to protect these centres and parades to safeguard the provision of the town centre services and facilities for local residents, businesses and visitors to the borough. These centres have developed over many years and will need to be improved to perform their respective roles in the provision of town centre services and facilities.

11.5 Walthamstow Town Centre is the primary retail centre and economic heart of the borough. District centres have a more localised role and are intended to complement Walthamstow by providing reasonably sized facilities for main and bulk convenience food shopping and a reasonable range of comparison shopping facilities. These centres have some small to medium or large food store anchors together with some comparison shopping. This plan seeks to reinforce their role by ensuring the provision of appropriate local shopping, leisure and community facilities to make them the hub of everyday life for the communities they serve.



11.6 Neighbourhood centres will provide local convenience shopping facilities for local residents within walking distance of their homes. They will be the hub for other facilities provided in and around them such as small office and service uses, schools, doctor's surgeries, community centres and open space. These centres will be expected to provide neighbourhood centre type facilities commensurate with their scale and function

within the hierarchy.

11.7 Local Retail Parades comprise a small grouping of shops within one or two parades often including the newsagent, a general grocery store, a post office and occasionally a pharmacy, hairdresser or other small shops of local nature. These parades serve immediate local needs only and provide primarily convenience goods within residential, commercial or mixed-use areas. To create more sustainable development forms, careful management of local retail parades will be necessary to encourage the development of an appropriate grouping of local shops and facilities.

Policy 48**New Retail, Office and Leisure Developments**

The designated centres as listed under Policy 50 will be preferred locations for new retail, office, leisure and cultural/tourism, entertainment, hotel, community and other service uses. Development proposals will be supported by ensuring that:

- A. The scale of the development is appropriate to the role and function of the particular centre or parade and its catchment.
- B. Where out-of-centre proposals are proposed,
 - i. All in-centre options (in Walthamstow Major Centre, the District and Neighbourhood Centres) have been thoroughly assessed for their availability and suitability in accommodating new development in whole or part in these locations;
 - ii. Where it has been demonstrated that there are no in-centre sites, preference has been given to edge-of-centre locations which are well connected to the centre by means of easy pedestrian access;
 - iii. Applicants would be expected to demonstrate the extent to which flexibility has been applied with regard to scale and format of proposed operations;
 - iv. An impact assessment has been undertaken (for proposals over 200 sqm) and there would be no adverse impact on the vitality and viability of nearby designated centres and parades as well as impact on town centre investment. In exceptional circumstances where it would be deemed unnecessary to undertake a full scale impact, a broad brush statement of impact will be required;
 - v. The scale of such provision is justified (as above) and is required to support new residential communities in an area deficient in shopping provision and there are no shops or community services within a 10 minute walk.
- C. Where new commercial units are proposed as part of mixed-use residential schemes, proposals are supported by an implementation/marketing strategy to secure the timely occupation of such units. Where alternative uses are proposed, supporting market evidence will be required to demonstrate that the unit has been advertised on reasonable and realistic terms over a period of two years.

11.8 Schemes that are poorly located can detract from quality of life, and compromise the achievement of social and environmental objectives, for example by drawing trade away from existing centres and leading to their decline. The London Plan designates Walthamstow Town Centre as a major centre. Accordingly, it is necessary to protect its dominant position and improve its trading performance for shopping activities, particularly higher order comparison goods. Accordingly, the

majority of additional retail growth will be located in this centre. However in addition, investment will be directed to other district and neighbourhood centres subject to available site specific capacity and impact considerations.

11.9 In line with national policy and the London Plan, this policy seeks to direct new investment in main town centres uses (as defined by the NPPF) and other supporting services and facilities to the designated centres.

11.10 Locating retail development and other main town centre uses within Walthamstow Town Centre, District and Neighbourhood Centres is the most sustainable way of meeting the needs of borough residents. It helps maximise the accessibility of facilities and promotes linked trips which reduces the need to travel and can increase footfall to the benefit of businesses. The scale and distribution of new retail, leisure or office development will need to be carefully controlled in order to ensure that new facilities do not detract from the success of the borough's designated centres, or make it more difficult for residents, workers and visitors to meet their shopping and leisure needs in a sustainable way.



11.11 To retain and develop their vibrancy and vitality, the designated centres must also have an appropriate mix and balance of not only retail, but leisure, cultural and service provision which all contribute to a centre's success. In particular, in the backdrop of changes in retailing with the continued growth in online shopping, it is necessary to ensure that the borough's centres vary in scale, function and composition of uses. Accordingly when considering proposals, the individual situation of centres will be taken into account in the determination of proposals.

11.12 The sequential approach, as required by government policy (NPPF) indicates that town, district and local centres are the preferred locations for the main town centre uses. This approach indicates that first preference for new developments

should be within centres followed by edge-of-centre locations. Out-of-centre locations should be the last in the order of preference.

Retail Impact Assessments

11.13 The submission of impact assessments for retail and leisure developments located outside town centres is in accordance with the NPPF. This is an important requirement as part of the validation process of a planning application.

11.14 Generally, a retail impact assessment is necessary when the proposed development is of a scale likely to have an appreciable impact on the trade of existing or committed retail, leisure and office developments in the surrounding area. The

NPPF sets out the scope of impact assessments. It mentions that where an application fails to satisfy the sequential test or is likely to have significant adverse impacts it should be refused. Therefore it is expected that the scope of any such assessment would be agreed with the Council in advance before the impact assessment work commences. Impact assessments will need to take into account the wider cumulative impacts on town centre health and investment where there are commitments (i.e. planning permissions) and development plan allocations for similar types of retail and leisure use in the wider catchment.

11.15 This plan sets a local floorspace threshold of 200 sqm. The policy also applies to extensions and the amalgamation of existing retail units which result in the creation of a single unit exceeding 200 sqm. It also generally applies to s73 and s106a applications to vary conditions associated with planning permission. As justification, it is considered that many small out-of-centre developments could cumulatively impact on the vitality and viability of nearby designated centres and parades.

11.16 This threshold is also considered necessary to implement the Council's planning objective to consolidate town centre activities in the designated centres, support the vitality and viability of the designated centres and manage the proliferation of retail and other town centre uses throughout the borough. In applying this threshold, the Council wishes to ensure that vulnerable centres/local parades do not experience further decline from trade diversion arising from the development of out-of-centre retail, leisure and office developments.

11.17 This plan recognises the positive contribution that mixed-use developments provide to support the vitality and viability of local areas. However, there have been instances in the borough where some new housing-led mixed-use developments have detracted from local areas due to the existence of vacant ground floor commercial units following the completion of the residential aspects of the scheme. This policy seeks to manage this issue by requiring developers to proactively work towards ensuring the timely occupation of units through the submission of a marketing/implementation strategy to plan for and provide assurance that any non-residential ground floor spaces provided in new mixed-use developments do not remain vacant for long periods.

Policy 49**Revitalisation, Adaptation and Regeneration in Designated Centres and Parades**

Development proposals involving the revitalisation, adaptation and regeneration of the borough's designated centres/retail parades and other non-designated areas will be encouraged where they seek to achieve the following planning objectives:

- A. Consolidation of retail activities within compact retail core areas of the borough's designated centres;
- B. In locations where retail or commercial demand no longer exist (as evidenced by vacancies), the conversion of retail and other commercial premises to appropriate alternative uses such as housing, business, leisure, entertainment uses and community uses, subject to other policies of this plan;
- C. Conversion of vacant upper floors of ground floor commercial buildings for housing purposes, where a high quality living environment offering good levels of residential amenity, low noise levels, safe streets, personal security can be created without impeding the development of primary town centre uses such as retail, office and leisure uses;
- D. Conversion or subdivision of vacant commercial floorspace to flexible and adaptive units for occupation by smaller business units with adequate servicing and the development of meanwhile and temporary uses for small business space, art, performance and exhibition as well as well for educational and vocational projects and activities;
- E. The establishment of Business Improvement Districts or similar initiatives to create an improved environment for business and secure improvements in town centre performance;
- F. Promoting local distinctiveness with regard to the 'offer' of individual centres, their place setting and the development of differentiated niche roles;
- G. Ensuring that replacement uses are well integrated (in function and design) with the remaining frontage to manage the impact of change on townscape character and neighbouring amenity.

11.18 There are a number of retail and commercial premises outside the designated centres and parades particularly along the main road corridors of the borough including Forest Road, Chingford Mount Road, Lea Bridge Road, Hoe Street, Leyton High Road and Leytonstone High Road. The current challenges facing the retailing industry arising from the growth of online shopping, changing shopping patterns etc, could lead to significant vacancies in some frontages. This policy seeks to manage retail decline by consolidating retail activities within compact retail core areas of the designated centres and parades and also encouraging alternative uses in declining areas that may occur.

11.19 Residential development appropriately located in designated centres e.g on the upper floors of shops and other commercial buildings in town centres have an important role to play in complementing new and existing retail and commercial uses.

The provision of an appropriate mix of uses, both within areas and in individual buildings, has positive benefits for the borough's designated centres. A mix of uses on individual sites and across an area will support viability and viability and promote the creation of successful places.

11.20 This policy also seeks to encourage the development of flexible and adaptable units and meanwhile uses, particularly to manage vacancy levels in the designated centres. Temporary uses can range from pop-ups to short term lets. These can make the best use of vacant properties and land to stimulate vibrancy, vitality and enhance the character of the borough's designated centres.

Other Initiatives

11.21 The Council is also supporting the designation of Business Improvement Districts (BIDs) to help to galvanise more individual business owners and managers to improve the competitive environment of their areas. These business-led bodies have the potential to generate new revenue streams in addition to the business rate levy and develop new locally delivered business growth services.

11.22 The development of distinctive centres, each with a unique 'offer' in terms of the range of activities offered and place setting is particularly necessary to support the vitality and viability of the Borough's centres. This policy seeks to encourage a greater degree of differentiation and specialisation between centres and avoid competition between centres with regard to the types of activities offered.



11.23 This policy also seeks to ensure that satisfactory standards are achieved in terms of how new uses are integrated in both function and design with adjoining uses along commercial and shopping frontages. This particularly relates to areas of change or renewal, where shops are declining and being replaced by alternative uses. In such areas it is necessary to ensure that proposals contribute to the general appearance

and character of the area, in particular at street level.

11.24 Accordingly, in determining planning applications, the nature of the proposed use and the implications on neighbouring amenity will be important considerations. In addition, the impact of the proposed use on the character and function of the parade or frontage in which it is located is equally important, that is, how well (in design and appearance) the proposed use can be integrated within the existing street block or frontage.

11.25 In some situations responsive design solutions will be necessary to ensure satisfactory integration. For example, in predominantly commercial frontages businesses who find themselves next to newly converted residential units may face complaints from residential neighbours regarding noise, traffic or other issues. For this reason, the comprehensive redevelopment or conversion of a group of properties along a retail or commercial parade would be better. Accordingly, it will be important to ensure that conversions to residential uses are coordinated and well managed.

Managing Changes of Use in Designated Centres

11.26 Well managed, changes of use could bring positive regeneration benefits. National permitted development rights play an important role in helping high streets adapt to changes in how people shop and use the high street. The impact of online retailing on shopper behaviour and its consequences for town centres and high streets has been evident in recent years nationally and locally.

11.27 Government policy (NPPF 2018) acknowledges the need for greater flexibility for changes of use to occur in high streets and town centres by allowing existing premises to change to a wider range of uses. More recently, the government has recently confirmed intentions to introduce new Permitted Development Rights allowing A1/A2/A5 uses to change to office B1, and A5 uses to change to dwellinghouse C3.

11.28 Locally, a new approach is required to manage the pattern and distribution of town centres uses. This section sets the policies that will apply in managing changes of use within the designated centres.

Policy 50**Managing Changes of Use in Primary Shopping Areas**

Proposals for new retail uses in the primary shopping frontages of Walthamstow and the District Centres (See Policies Map), will be encouraged to ensure that retail uses (use class A1) predominate on ground floors. Other uses will be permitted where all of the following criteria are met:

- A. The proposal will not result or contribute to the dominance of non-retail uses in the designated primary shopping area;
- B. The proposal will not result or contribute to the equivalent of a group of three or more adjoining standard size shop units in non-retail uses;
- C. The proposal will maintain the continuity of active frontages and provide a direct service to visiting members of the general public;
- D. The extent to which the proposed use is capable of attracting a significant number of shoppers/visitors to the centre;
- E. The extent to which the proposed use contributes to the regeneration objectives for the local area;
- F. The contribution the proposed use will make to the vitality and viability of the proposed frontage and the centre generally and will contribute to shoppers' experience and;
- G. The availability of suitable alternative vacant premises outside the primary frontage.

11.29 Primary frontages are shown on the Policies Map. This policy aims to ensure that Walthamstow Major Centre and the District Centres continue to fulfil their primary role of providing convenient and accessible shopping and town centre facilities within reasonably compact areas. In support of this policy, government policy as contained in the National Planning Policy Framework (NPPF) requires planning policies to define the extent of town centres and primary shopping areas and make clear the range of uses permitted in such locations, as part of a positive strategy for the future of each centre.

11.30 The success of any particular centre is dependent, at least in part, upon retaining a reasonably close grouping of shops selling a wide range of goods. Shopping particularly for items such as clothes, shoes, footwear and jewellery etc is in essence a process of search and comparison before final selection. Therefore, grouping shops conveniently together attracts shoppers and if the shopping frontage is broken or diluted by many non retail, this leads to a loss of attractiveness.

11.31 Furthermore, mindful of the current challenges facing town centres as evident by the growth of internet shopping, current conditions in the retailing industry, uncertainty regarding a Brexit deal, competition from out-of-centre developments

etc, it is necessary to ensure the creation of a cohesive retail base at the most appropriate locations in the designated centres by managing the proliferation of commercial activities stretching in long lengths along road corridors.

Policy 51

Managing Changes of Use outside Primary Shopping Areas of Walthamstow Town Centre and the District Centres

Outside the designated primary shopping areas of Walthamstow and the District Centres, a diverse range and mix of both retail and non-retail uses will be encouraged at ground floor level. In managing the proliferation of particular types of uses, all of the following factors will be considered:

- A. The contribution the proposed use will make to the vitality and viability of the particular frontage and centre generally;
- B. The nature of the business operation and the number of such occupiers in the designated centre or parade and the local area generally;
- C. The concentration or clustering of such business operators in particular locations or frontages and the cumulative impact on the image of the designated centre, parade or local area in which it is located; and
- D. The extent to which the proposal can be demonstrated to contribute to regeneration objectives or help to tackle social deprivation in the local area.

11.32 Outside the designated primary shopping areas there should be greater opportunities for encouraging a diversity of uses. Accordingly the retail protective should not apply in these areas. However, these areas will still be important locations for some types of retailing activity. This may include new businesses that cannot initially afford prime locations, or retailers specialising in a particular product or serving a local ethnic minority community.

Policy 52**Managing Changes of Use in Neighbourhood Centres and Local Retail Parades**

Within Neighbourhood Centres and Local Retail Parades retail uses will be encouraged to predominate on ground floors. The loss of existing retail units will be only justified where all of the following criteria are met:

- A. Local residents would still have a reasonable range and choice of essential shops in the designated parade or a nearby parade within a reasonable walking distance;
- B. The replacement use could be considered beneficial to the local community or provide locally distinctive community services that serve local residents and nearby communities;
- C. The shop unit has been vacant for a continuous period of at least six months and there is marketing evidence demonstrating the advertisement of the unit on reasonable and realistic terms; and
- D. The proposed use would contribute to the vitality and viability of the particular frontage and centre generally.

11.33 Within the designated neighbourhood centres, the Council has defined a retail core area as (Local Retail Parade) where the above retail protection policy applies. This policy also applies to other Local Retail Parades as shown on the Policies Map.

11.34 It is necessary to protect these designated retail parades in order to provide accessible shopping facilities for all local residents. To minimise the need to travel, ideally all residential properties should be within a reasonable walking distance of a full range of essential shops. However the Council accepts that it may not be possible to retain all shops in the borough as in some situations the viability of retail uses depends on many other economic factors. Where there is sufficient population to support these, the policy seeks to safeguard such units, particularly those that are reasonably sized with adequate servicing facilities. Retention of such units will help to attract new retailers and therefore contribute to the provision of a good range of essential shops.



11.35 Such parades represent frontages where retail activity is more dominant. They often have a key footfall-generating feature or retail 'anchor' and contain the minimum number or range of shops which the Council considers necessary to enable the centre to perform its local shopping role. The need to protect these parades is important particularly to meet day to day shopping needs. This policy therefore

seeks to generally resist proposals resulting in the loss of shops within the designated parades.

11.36 In assessing the extent to which the surrounding area is deficient in essential local shops, the number and range of uses within the nearby local area will be an important consideration. It is considered that residents' accessibility to local parades would be seriously compromised if they are located more than a 10 minute away by foot. This is approximately 800m to the nearest facility. In implementing the policy, it is accepted that there may be situations where the retention of a shop may be impossible for economic reasons. This policy therefore makes provision for alternative replacement uses appropriate to a shopping area to be considered such as those within Class A2, A3, A4, A5 and doctors/dental surgeries. This is however subject to compliance with other development plan policies.

Policy 53**Evening and Night-time Economy Uses**

Proposals for evening and night-time economy uses that contribute to the vitality and viability of the borough's designated town centres will be encouraged where:

- A. They are part of a strategy to create cultural quarters e.g cultural/food & beverage uses in a designated centre or support the creation of a balanced provision of evening/night-time uses;
- B. The design of the development particularly focuses on public safety, crime prevention and the reduction of anti-social behaviour;
- C. 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)
- D. There will be no significant individual or cumulative adverse effect on the surrounding residential amenity due to noise, traffic, parking, general disturbance or problems of disorder and nuisance;
- E. Arrangements for mitigating pollution including ventilation equipment, refuse disposal, grease traps and noise insulation is provided in a way that minimises visual and environmental impact;
- F. Access requirements for people of all ages and abilities are provided; and
- G. Access to public transport facilities will be available during the hours of operation.

11.37 The night-time economy has been growing over many years. Well-managed, it will support vitality and viability of the borough's designated centres and become part of a centre's self-image and atmosphere, as well as creating jobs, increasing footfall, and providing opportunities to showcase a wide range of ever-changing arts and cultural events.

11.38 The need to plan positively for a range of complementary evening uses including Arts, Culture and Entertainment uses - cinemas, theatres, restaurants, bars and nightclubs - that appeal to a wide variety of age groups is recognised. These uses may need to be managed in appropriate locations.



Management of Night-Time Economy Uses

11.39 The emerging London Plan has designated Walthamstow Town Centre as an area of regional or sub-regional significance for evening and night-time economy uses. Accordingly night-time and evening economy uses will be promoted and encouraged in this centre. Other centres and locations will also have a supporting role by providing smaller scale activities. These include Walthamstow Village/Orford Road and Ravenswood Industrial Estate, subject to site specific development opportunities. These are the places more likely to benefit from the vitality that restaurants, cafes and bars would bring, as long as these are provided in the right quantity and well managed in accordance with the policy tests above.

11.40 Management is key to the delivery of successful evening economy uses. In most cases, a strategy will be required to provide guidance on the scale of activities proposed and how activities would be managed. The creation of cultural quarters will provide the mechanism for both planning and licensing systems to support the management of the evening and late-night economy. Accordingly, the above integrated policy approach will take account of and complement the borough's Statement of Licensing Policy.

Policy 54**Shopfronts and Signage**

Permission will be granted for new shop fronts and signs which comply with all of the following:

- A. The design is related to the scale, proportion and appearance of the building and respects the character of the area or parade where the proposal is located;
- B. The design is in keeping with standards for the local area or parade as being promoted under existing shopfront improvement schemes;
- C. The design retains, and where practicable provides a separate entrance to upper floor accommodation where this is separate from the ground floor use and;
- D. Principal entrances to upper floor accommodation avoid the rear of buildings where practicable as this can give rise to personal safety and security issues;
- E. The design incorporates measures to improve or maintain access for all users;
- F. An appropriately designed shutter is provided.

Applicants should note that there are additional controls relating to advertisements and signs in Conservation Areas



11.41 Design and environmental quality issues are important to town centre vitality and viability. Shopfronts play a key part in establishing and defining the visual character of high streets and shopping parades. There is continuing commercial pressure for new designs and modifications in relation to shop fronts. In managing such changes,

important considerations will be the effect of alterations and changes of use on the street scene and the potential for the residential use of upper floors.

11.42 A shop style window display is necessary to protect the townscape of commercial/shopping areas. Window displays help to maintain the attractiveness and continuity of the shopping frontage and can provide information for users and visitors. In support of this policy, further guidance will be provided through a Shopfront Design Guide Supplementary Planning Document.

11.43 Shop Front Improvement Schemes often provide the opportunity to improve the appearance of local areas as a means of supporting the growth of local businesses and raising the image of the town centres. To safeguard the protection of such shopfronts, the Council will take necessary enforcement action to ensure compliance

11 Distinctive Town Centres and High Streets

with the design objectives for the scheme area. As required by the Disability Discrimination Act 1995, access to shops must be given special consideration in shopfront design. The Council expects proposals to include design measures to ensure that access to and circulation within shops is possible for all members of the public.

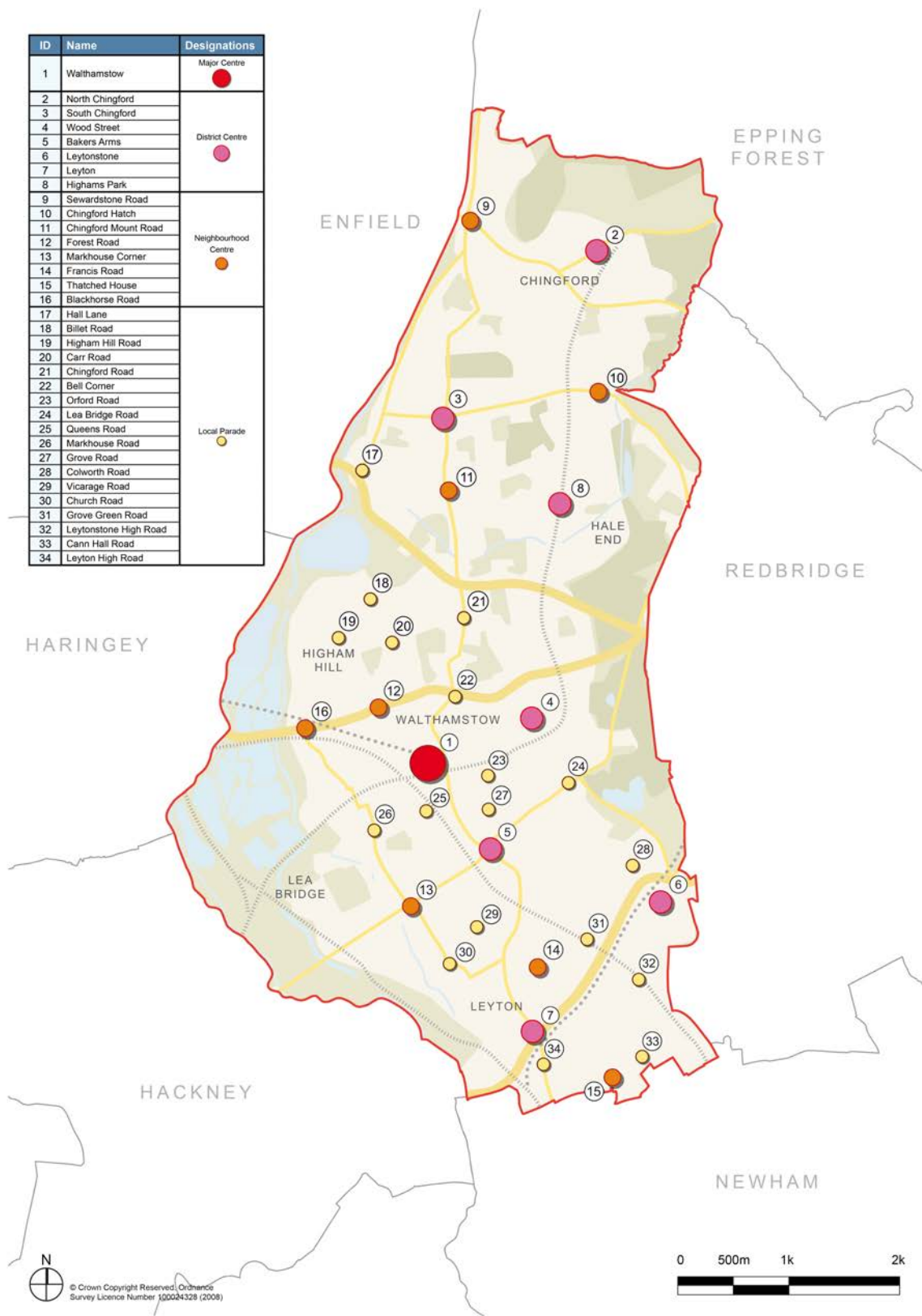


Figure 11.1

12 Social and Community Infrastructure

Strategic Objective

Ensure timely, strategic and local infrastructure investment and delivery to support good sustainable growth for communities both now and in the future, through working with partners, investors, developers and providers.

12.1 Social and Community infrastructure covers a broad range of facilities including schools and childcare facilities, health services, places of worship, libraries, youth and other community facilities, sport and leisure facilities, public houses, events and cultural facilities and policing amongst others, all of which contribute to the quality of life and well-being of the Borough and its residents. The protection, enhancement and provision of additional social and community infrastructure is support by policies in the London Plan and the National Planning Policy Framework.

Life Chances Programme

12.2 Waltham Forest's Life Chances Commission established in 2017 examined the obstacles which prevent some of our young people reaching their full potentials.

12.3 To ensure our young people's voices were heard, over 2,500 of them took part in the Big Youth Conversation – Waltham Forest's largest ever engagement with young people, through lessons in schools, local events, as well as via online surveys. Their experiences and views were used to compile the council's response to the commission's report.

12.4 The Life Chances Commission looked at three stages in a young person's development: the early years; their time at school, and then post-16 when they choose to continue in education, pursue an apprenticeship or find work.

12.5 Life Chances want to see the 'school readiness' of our youngest children improve, better attainment and progress in school, greater awareness about careers options, increased attendance at top universities, greater uptake of apprenticeships, and better paying jobs locally.

12.6 Waltham Forest Council is now working to help young people access the opportunities they need, through an Opportunity Bank that will link them to work, training and educational opportunities, and provide housing and health advice. Other areas of work are to increase the take-up of free pre-school support, including nursery places, as evidence shows this can boost a child's development, and developing the borough's apprenticeship scheme that will help get our young people into the careers they want.

12.7 This will be a new way of working - a collaborative approach between Waltham Forest Council, our partners and our young people to improve the life chances of all. Over the coming months and years we plan to work to improve the life chances of all our residents by breaking down the barriers that impact our young people across education, housing, transport, social care, crime, jobs to name just a few.

Policy 55

Social and Community Infrastructure

Proposals for new or improved social and community infrastructure will be supported where they satisfy the following criteria by:

- A. Meeting current and projected identified need
- B. Locating facilities in areas accessible by sustainable modes of transport such as walking, cycling and public transport for staff and users
- C. Demonstrating a high quality and inclusive design, providing access for all
- D. Providing flexible and adaptable buildings permitting co-location of other forms of social infrastructure in the same building
- E. Maximising the availability of the facility to the community through evening and weekend opening.
- F. The incorporation of community facilities into mixed use residential schemes where it meets an identified need will be supported.
- G. New development will be expected to contribute to the provision of additional social infrastructure to accommodate the impact of new development upon existing social and community infrastructure provision.

12.8 With the population projected to grow in Waltham Forest and to accommodate the needs of future residents, there will be a need to protect, enhance and provide new social and community facilities. As part of making sure that this happens, the Council maintains an annually updated Infrastructure Delivery Plan (IDP) to assess the types quantities and locations of the existing provision of infrastructure and to match provision to future needs.

12.9 In regularly updating the IDP, the Council engages with and uses information collated from service providers such as the Councils Education and pupil planning team, Waltham Forest Clinical Commissioning Group (CCG), Emergency Services, other Council departments and relevant social infrastructure providers, as well as the voluntary and community sectors.

12.10 The Council will work with all relevant stakeholders to encourage the design of flexible community facilities that can accommodate a range of needs, where appropriate to enable, for example community use for sports facilities in schools and colleges. Additional analysis will also be undertaken to identify infrastructure needs on a more localised basis and for specific community groups or groups with protected characteristics.

Policy 56**Loss of Existing Social or Community Infrastructure**

- A. Proposals involving the loss of existing social or community infrastructure will not be permitted unless one or more of the following criteria are met:
- B. i. A replacement facility of equivalent or better quality that meets the demonstrable needs currently met by the existing facility is provided
- ii. It can be demonstrated that adequate alternative facilities which meet the needs currently being met by the existing facility are within walking distance, without leading to a shortfall in provision for the specific type of social or community infrastructure in the area
- iii. It can be demonstrated that the facility is no longer required in its current use and cannot viably accommodate other current forms of social or community infrastructure.

12.11 If B (iii) applies, evidence must be submitted to demonstrate that the loss of the facility in question would not create, or add to, a shortfall in provision for this specific type of social or community infrastructure in the borough and demonstrate that there is no demand for any other suitable social infrastructure use on the site. The applicant must demonstrate that all reasonable efforts have been made to preserve the facility and site to meet identified local need. Evidence required includes but is not limited to 12-18 months marketing evidence.

Education and Childcare Facilities

12.12 Waltham Forest is experiencing rapid population growth which has a significant impact on local school place planning. The Council has a Statutory Duty to:

- Ensure sufficient school places - (Section 4 (1) Education Act 1996 as amended)
- Increase opportunities for parental choice - (Section 2 of the Education and Inspectors Act 2006, Education Act 1996 as amended)
- Comply with any preference expressed by parents provided compliance with the preference would not prejudice the provision of efficient education or the efficient use of resources - (Section 86 Schools Standards and Framework Act 1998,)
- Ensure fair access to educational opportunity - (Education Act 1996 as amended)

12.13 Paragraph 94 of the National Planning Policy Framework states that 'it is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local Planning Authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:

- A. give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and,
- B. work with schools promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.'

12.14 The Draft London Plan states that in order 'to ensure there is a sufficient supply of good quality education and childcare facilities to meet demand and offer education choice, Boroughs should:

1. Identify and address local needs and any shortages in supply, both locally and sub-regionally, including cross-boundary issues;
2. identify sites for future provision through the Local Plan process, particularly in areas with significant planned growth and/or need;
3. ensure that development proposals for housing and commercial facilities incorporate suitable childcare provision and encourage nursery provision within primary schools, where there is a need.

Policy 57**Education and Childcare Facilities**

Development proposals for new education or childcare facilities in the borough will be supported

- A. In areas of identified need
- B. In accessible locations, with good public transport accessibility and access by walking and cycling
- C. Where entrances and playgrounds are situated away from busy roads
- D. where proposals maximise the use of educational facilities for community, recreation or cultural use, through appropriate design measures
- E. Where encouragement is given to the shared use of services between schools, colleges, universities, sports providers, community and cultural facilities
- F. Where new development is designed to be accessible and inclusive to meet the needs of a range of users, including disabled people
- G. Ensure that facilities incorporate safe, suitable and accessible outdoor space
- H. Ensure that there is no net loss of facilities, unless it can be demonstrated that there is no ongoing or future demand.

Early Years

12.15 Local Authority responsibilities under the Childcare Act 2006 include a duty to undertake an assessment of the sufficiency of local childcare provision. From 1st September 2008, Section 7 of the Childcare Act 2006 placed a legal duty on local authorities in England to secure free early years provision for eligible two, three and four year olds (and five year olds who are not yet of compulsory school ages) in their area. All three and four year olds and 40% of two year olds (subject to meeting criteria) are entitled to 15 hours of free nursery education for 38 weeks of the year. This applies until they reach compulsory school age (the term following their fifth birthday). Free nursery education can be delivered by public or private sector providers and parents can pay for additional hours or services.

12.16 The statutory requirements imposed through the Apprenticeship, Skills, Childcare and Learning Act 2009 mean that the London Borough of Waltham Forest must ensure that there is sufficient provision of not only early education places, but also children's centres.

12.17 From 1st September 2017, Section 1 of the Childcare Act 2016 placed a legal duty on the Secretary of State to secure additional free early years provision for eligible parents and carers of three and four year olds (and five year olds who are not yet of compulsory school age) in their area. Eligible families will be entitled to an additional 15 hours of free nursery education for 38 weeks of the year in addition to the existing 15 hours universal entitlement. This duty may be discharged to local authorities under Section 2 of the Childcare Act 2016.

Primary Education

12.18 As of September 2017, Waltham Forest is home to 53 mainstream schools providing primary education, two of which also provide secondary education. Included in this total are two infant schools and two junior schools. For September 2017, 89% of pupils were offered their first preference school and 98% were offered one of their top three preferences.



12.19 The main method for calculating primary school requirements in Waltham Forest is the cohort survival method. The base information used for forecasting the number of children entering reception is the number of births within the borough and the number of children in reception classes (obtained from the January School Census for the previous year). The birth figures are provided by the Office for National

Statistics (ONS). The birth data from ONS allows the historical uptake factor to be calculated and this represents the number of children born in the authority who then goes on to attend schools in the Borough.

12.20 Once the number for Reception has been projected, survival ratios are then applied to each age cohort as they move through the education system. Cross border movement, both in and out of the borough, is captured within existing transfer rates used to calculate the projections using historic census data and needs are planned for accordingly.

Secondary Education

12.21 As of September 2016, Waltham Forest is home to 17 mainstream schools providing secondary education, two of which also provide primary education. For September 2017, 78% of pupils were offered their first preference school and 94% were offered one of their top three preferences.



12.22 Secondary phase historical data is used to calculate the transfer rate from Year Six to Year Seven. A transfer rate of approximately 90% is applied to the Year Six projected rolls to calculate the projected Year Seven intake. This is based in part on a five year average transfer. In addition, the Borough have historically been a net exporter of pupils at Year Seven, but this trend is slowing due to our

neighbouring boroughs being less able to accommodate Waltham Forest resident applications that they have in the past. The Boroughs projections support the expected increase in retention rate going forward.

Further Education / Post 16 (FE)



12.23 Access to Further Education (FE) plays a key role in skills development and life-long learning and assists both residents and businesses progression into, and through, sustainable employment, including apprenticeships. London is predicting an increase in demand for FE provision, due to the growing number of 16-19 year-olds and the new requirement for all young

people to remain in learning until they are 18. Meeting this growing demand will require strategic planning, cross boundary working and a partnership approach. FE institutions also provide valuable community and cultural facilities. The Council will continue to support existing and new FE providers enhance their colleges and other training facilities through the Mayor of London's Skills for Londoners Capital Fund.

Special Education Needs & Disabilities (SEND)

12.24 The borough is expecting an increase in the number of residents requiring Special Education and Disability (SEND) provision. Some of this provision will continue to be located within mainstream schools and some within specialist schools. It is important that all schools are designed to be accessible and inclusive, meeting the highest standards of accessible and inclusive design.

Delivering New School Places

12.25 Since 2011, new providers of school places have been able to establish state-funded Free Schools, and now all new schools are deemed to be Free Schools. There are also a growing number of schools that have converted to become Academies, which are independent of Local Authority control.

12.26 School places are no longer, therefore, solely provided by the Council and the Council works in partnership with these and other providers to ensure that the need for school places is met. However, the Council has the overall responsibility to ensure there are enough school places available for local children.

School Design Charter

12.27 The Council's School Design Charter, adopted in July 2018, provides 10 key principles for achieving high quality design in school developments. It also seeks to highlight the Council's commitment to achieving well designed teaching and learning environments that offer out-of-hours facilities for the broader community. The Charter provides guidance for developers, planning applicants, planning officers and other interested parties involved in developing new and existing schools ⁽³⁾

Funding New School Places

12.28 The system of 'developer contributions', introduced by the Town & Country Planning Act 1990 S106, ensures that developers meet their obligations to the whole local community. Waltham Forest Council does not have sufficient resources to construct buildings and other infrastructure to keep pace with the rate of new development. Therefore in keeping with the legislation, contributions towards providing additional educational infrastructure have been, and continue to be sought from developers, where they meet the requirements of the Community Infrastructure Levy (CIL) Regulations 2010 as amended.

3 https://walthamforest.gov.uk/sites/default/files/FINAL%20-%20LWF2827_Schools%20Design%20Charter%20Booklet%20v2.pdf

13 Promoting Health and Well-being

Strategic Objective

Improve the health and well-being of all who live and work in the borough

13.1 It is important for all Waltham Forest residents to have access to high quality living environments and healthy lifestyles, as well as safe, accessible and healthy environments to live, work, visit and interact.

13.2 Local planning authorities play a vital role in influencing the built environment to improve the health and well-being of their residents. National and London wide planning policy has recognised the need to address health and well-being needs through the provision and access to safe public space, health facilities, social infrastructure and healthy food.

Life expectancy in the borough is



**84
years**



**79
years**



The borough is ranked the
35th most deprived out
of **326 local authorities** in
England in 2015

The borough is **7th most
deprived borough** in
London.



22% of children in the
borough **within Reception**
were **overweight or
obese**

39% of Children
within **Year Six** were
overweight or obese.

Policy 58**Promoting healthy communities**

Proposals will promote the creation of healthy and sustainable places and communities by:

- A. Encouraging active and sustainable travel through walking, cycling and the use of public transport and the adoption of the Healthy Streets Approach;
- B. Encouraging the mitigation of indoor and outdoor pollutants and other environmental impacts on health and well-being;
- C. Requiring all new major developments of 100 housing units or more, non-residential developments of 10,000 sqm or more, and proposals for takeaways, betting shops and payday loan shops to submit an Health Impact Assessment (HIA) to demonstrate impacts on the health and well-being of communities;
- D. Working with NHS partners, schools and community groups to support the provision of new and improved healthcare facilities and improvements to existing facilities;
- E. Encouraging new major commercial developments in Walthamstow Town Centre, designated District Centres and other highly accessible locations to incorporate social infrastructure such as; free drinking fountains and free publicly accessible toilets as part of the development;
- F. Supporting the enhancement and inclusive access to public green and open spaces, and sports and recreation facilities;
- G. Encouraging food growing within the borough and the protection of existing allotments to support the provision of new food growing spaces.

13.3 Waltham Forest is the 29th most deprived local authority in the UK for air quality and road traffic impacts on the living environment. The Draft London Plan Healthy Street Approach and initiatives such as Enjoy Waltham Forest will restrict the use of personal motor vehicles by encouraging walking, cycling and the use of public transport, reducing the impacts of poor air quality and build healthier lifestyles. This will coincide with the adoption of measures to mitigate indoor and outdoor pollutants to minimise exposure and impact of poor air quality on all residents and visitors to the borough.



13.4 The Draft London Plan defines Health Impact Assessments (HIA) as "a systematic framework to identify the potential impacts of a development proposal, policy or plan on the health and well-being of the population and highlight any health inequalities that may arise". A HIA is a useful tool to identify the positive and negative impacts new developments and proposals have on the health and well-being on the borough's residents and communities and to ensure positive measures are considered.

13.5 In collaboration with the NHS, community groups and schools, the provision of new and improved healthcare facilities and improvements to existing healthcare facilities will ensure local residents have access to high-quality services to meet their physical, mental and general well-being needs. Schools and colleges can serve the wider community by enabling community use of their sports facilities out of school hours. This would include a requirement for a community use agreement to ensure accessible fees and charges, priority access for WF community clubs

13.6 To ensure residents and visitors have access to necessary social infrastructure, large-scale developments that incorporate social infrastructure such as free drinking fountains, free public toilets, seating and shade as part of the development will be supported within the borough's Major and District Town Centres.

13.7 Access to social infrastructure such as public drinking fountains, public toilets, seating and shade is a necessity for urban environments and should be available to meet the needs of all residents and visitors of the borough.

13.8 Improvements and enhancements to the borough's public green and open spaces will ensure all residents and visitors have safe access to well-maintained spaces and facilities.

13.9 Food growing will benefit the physical and mental well-being of residents through the provision of fresh and healthy food, as well as exposure and access to the natural environment and wildlife.

Policy 59**High quality environment**

High quality and healthy environments can be encouraged by:

- A. Supporting new development that contributes to a high quality environment that enables healthier and active lifestyles and reduce health inequalities;
- B. Promoting and encouraging well designed, safe and accessible spaces for social interaction;
- C. Supporting new developments that meet appropriate environmental standards to minimise air, water, noise and light pollution and address the risks arising from contaminated land and hazardous substances, to ensure satisfactory amenity is provided for future and surrounding occupiers;
- D. Ensuring all buildings to meet highest standards of accessible and inclusive design so they can be used safely and easily.

13.10 It is important for all Waltham Forest residents and visitors to have safe and accessible public spaces where they can gather and interact. This is vital for local residents to engage, form relationships and develop healthy and inclusive communities.

13.11 A high quality environment can influence healthier and active lifestyles by encouraging physical activity and mental well-being through new development.



13.12 Poor environmental conditions related to air quality, water, noise and light pollution, as well as proximity to contaminated land and hazardous substances has been proven to have a detrimental impact to public health. New development can mitigate these impacts through adhering to appropriate environmental standards in line with policies 87 to 94 set out in the Climate Change Resilience chapter.

Policy 60**Hot Food Takeaways**

Proposals for new hot food takeaways (A5 use class) will only be permitted where:

- A. It is located within a primary and secondary frontage or Retail Parade and would not result in more than 5% of the units in the centre as a whole being A5 uses;
- B. There would be at least five non-A5 units between the proposed use and an existing A5 use;
- C. There are no more than two A5 units located opposite or adjacent to an existing A5 use;
- D. It is not located within 400 metres of the boundary of a nursery, a primary school, a secondary school, a community college or youth facilities; and
- E. A commitment is made to operate in compliance with the borough's Healthier Catering Commitment within 6 months of opening.

13.13 There are a significantly high number of hot food takeaways across the borough. The overconcentration of hot food takeaways and poor availability of healthier food options reduces the opportunities for residents and visitors to make healthy food choices.

13.14 The overconcentration of hot food takeaways within the borough's designated town centres, and retail parades has a detrimental impact on the character, vitality and function of the shopping area. In effort to reduce further proliferation of these uses and encourage healthier lifestyles, restrictions to new hot food takeaways will prevent the clustering of hot food takeaways in highly accessible areas.

13.15 Childhood obesity has become a cause for concern in the borough. Restricting hot food takeaways within 400 metres walking distance of nurseries, primary schools, secondary schools, community colleges and youth facilities should seek to prevent and reduce the health implications related to rising levels of childhood obesity and help promote healthier communities.



13.16 The borough's Healthier Catering Commitment is a voluntary scheme that seeks to help food businesses and outlets and caterers to make healthy improvements to their food options. This includes various small actions around reducing the consumption of fat, salt and sugar and increase access to fruit and vegetables.

Policy 61**Betting Shops and Payday Loan Shops**

Proposals for new betting shops or payday loan shops will only be permitted where:

- A. It is located within a designated centre and would not result in more than 5% of the units in the centre being a betting shop or payday loan shop (Sui Generis); and
- B. There would be at least five other town centre uses between the proposed use and an existing betting shop or payday loan shop (Sui Generis).

13.17 The over concentration of betting shops and payday loan shops (sui generis use class) can have negative impact on the character, vitality and role of the boroughs town centres and retail parades, as well as promote unhealthy lifestyle that can be particularly harmful to vulnerable people. Restrictions to new proposals for betting shops and payday loan shops will prevent the clustering and spread these uses in the boroughs town centres and retail parades.

14 Creating High Quality Places

Strategic Objective

Promote exemplary standards of design in place-making and the highest quality of development.

14.1 Waltham Forest must ensure that as the borough develops, the community benefits from high quality development. Delivering high-quality places is essential for sustainable development and is critical to achieving the necessary growth across the plan period. Good design is key to enhancing the quality of life for the borough's residents and is core to shaping the places and spaces that people use every day. New development will need to be supported by excellence and innovation in design; building upon the distinctive character of its context whilst enhancing its overall quality. This plan will seek to ensure the delivery of high-quality places to generate a more inclusive, connected and attractive borough for local people.

Policy 62

Delivering High-Quality Design

To deliver high-quality design, development proposals should:

- A. Be supported by a clear and robust design rationale based on a sound understanding and analysis of local context and character;
- B. Reinforce and/or enhance local character and distinctiveness, taking account of patterns of development, urban form and grain, building typology, architecture, materials, trees and landscaping and other features of local and historical significance;
- C. Provide appropriate physical, legible and safe connections with surrounding streets, paths and neighbouring development;
- D. Respond to their context in terms of scale, height and massing;
- E. Consider appropriate intensification and density in line with Policy 5;
- F. Provide a coherent layout and block structure with active street frontages onto the public realm;
- G. Have a clear distinction between public and private space;
- H. Be visually attractive, with architecture and landscaping that respects its context without unduly restricting style and encouraging innovation;
- I. Include high quality materials and detailing which are attractive, durable and sustainable;
- J. Provide an appropriate level of well-designed, suitably located and usable amenity space;
- K. Incorporate high quality landscaping, tree planting and urban greening measures to maximise biodiversity and ecological interest;
- L. For residential schemes, address the Design Council "Building for Life 12" criteria;

- M. Implement design measures that increase climate change resiliency specifically in relation to surface water management, microclimate control, waste management, air and noise pollution;
- N. Maximise the versatility, adaptability and sustainability of buildings and spaces through design to accommodate for present and future requirements;
- O. Integrate building services equipment into development so to prevent any adverse visual impacts to the building and surrounding area;
- P. Maintain high-quality throughout the entire planning process from permission through to completion;
- Q. Facilitate inclusive, safe and accessible environments for all;
- R. Incorporate measures to 'design out crime' into development proposals following guidance from the 'Secured by Design' scheme.

14.2 Waltham Forest has a well-established independent, expert design review process in place. The design review panel helps to ensure the delivery of high-quality design and place-making by providing tailored support for individual developments with the aim of improving and enhancing the quality of life for local people and the prosperity of the borough. Developers and applicants will be expected to use this service so that proposals are given appropriate and robust design scrutiny as part of the planning process, ensuring consistency in design and quality from the granting of planning permission through to completion. It also ensures that the cumulative effects of minor amendments can be assessed comprehensively to secure the highest standard of design in the construction stages of development.



14.3 High-quality sustainable and inclusive design is supported in line with the London Plan. Development should build upon the character and context of the local area; ensure safe and easy access for all; be resilient to climate and emergencies (such as fire) and incorporate measures to reduce crime.

Policy 63**Taller Buildings**

Taller buildings will be assessed against the following criteria:

- A. Proximity to transport interchanges and nearby facilities such as shops, community facilities and other services;
- B. Impact on the character of their surroundings in relation to the height, scale, mass and volume of existing buildings;
- C. Impact on local heritage assets, including conservation areas and listed or locally listed buildings;
- D. Contribution to high quality design, architecture, materials and sustainable design and construction methods;
- E. Contribution to legibility and high-quality place-making in the local area;
- F. Impact on the existing streetscape, taking into account the provision of active frontages and their impact on the quality of public realm at ground level;
- G. Impact on the existing skyline;
- H. Prevent overshadowing of surrounding public open space, private outdoor space, private amenity of neighbouring properties, watercourses and canals;
- I. Contribution to the enhancement of townscape, landscapes, heritage and historic assets and their skylines, and preservation of landmarks and views identified in the Urban Design Supplementary Planning Document (SPD);
- J. Inclusion of appropriate mitigation measures to adverse environmental impacts in relation to wind movement, solar glare, shadowing, microclimate conditions, air and noise pollution;
- K. Contribution to the enhancement of safe and accessible evacuation routes for everyone in the case of emergency.



14.4 Taller buildings can help to optimise the use of land and assist in accommodating the borough's anticipated growth over the coming years. Taller buildings also support legibility at key destinations and can become beacons for regeneration to stimulate further investment. However, they can also present a number of challenges which should be addressed as early as the pre-application stage when classification as a tall building will

be determined. They should be managed sensitively against local context and must be carefully considered in the context of their immediate and wider surroundings. Proposals will only be supported where they do not have adverse impacts in regards to these considerations.

14.5 Taller buildings will be assessed in line with the Characterisation and Intensification Study (2019) and the guidance as set out in Waltham Forest's updated Urban Design SPD on the management of taller buildings.

Policy 64

Amenity

New development should respect the amenity of existing and future occupiers, neighbours and the surrounding area by:

- A. Avoiding adverse impacts through overlooking, enclosure and the loss of privacy, outlook and daylight/sunlight to adjacent residential properties;
- B. Avoiding adverse impacts through poor microclimate conditions, air pollution, odour, noise and vibration and/or light pollution;
- C. Providing sufficient facilities for the storage, collection and disposal of refuse; considering the level and type of provision, its location and minimising any negative impacts it may have on visual amenity, access, health and security.

14.6 Ensuring high standards in the protection of the amenity of neighbours and occupiers in development is critical to delivering sustainable growth across the borough. When assessing proposals, amenity will be carefully assessed in regards to its associated environmental, health and social impacts, in relation to both the immediate surroundings and the wider environment. Specific focus on reducing negative impacts such as perceived sense of enclosure and loss of daylight, privacy and outlook; exposure to odours, noise and vibration; poor air quality and poorly controlled waste in development proposals will be the subject of an updated Urban Design SPD.

Policy 65

Designing Out Crime

The Council will aim to improve community safety and cohesion by working with partners to:

- A. Minimise opportunities for criminal behaviour by requiring all forms of new development to incorporate principles and practices of 'Designing out Crime' and Secured by Design;
- B. Co-ordinate land uses to minimise the likelihood of an increase in crime and disorder;
- C. Promote safer streets and public realm improvements throughout the Borough

14.7 Ensuring that the borough is safe is a priority for Waltham Forest. Anti-social behaviour does not just make life unpleasant; it prevents a peaceful community life and degrades the environment, and can have a big impact on resident's mental

health and wellbeing. the planning process can minimise opportunities for such behaviour through the design of new developments. By taking opportunities to maximise 'natural surveillance', and making clear distinctions between public and private space, the opportunities for criminal or anti-social behaviour can be reduced.

14.8 The design and layout of the physical environment is key to creating safe environments and reducing crime and disorder. 'Designing out crime' and designing in community safety should be core principles in planning any new development, town centres, public spaces, transport hubs and streets. Development will be expected to reflect guidance on 'Designing out crime'.

Policy 66

Advertisements

Proposals for advertisements, hoardings and signage should:

- A. Be well- integrated into the public realm, allowing for ease of pedestrian access, highway safety and preventing visual clutter;
- B. Complement the local character, context and visual amenity of the vicinity including not negatively impacting on heritage assets and their setting;
- C. Avoid negatively impacting the host building and local area through visual dominance and overbearing;
- D. Avoid creating a proliferation of advertisements;
- E. Avoid interference of existing views from adjacent properties;
- F. Avoid flashing illumination both internally and externally, and minimise the impact of light pollution on adjacent properties.

14.9 Advertisements, hoarding and signage can affect the visual appearance of an area and reduce townscape quality and public safety. In accordance with the policy guidance set out above, careful management of advertisements will take into consideration their quantity, size, design, siting and illumination in relation the surrounding environment.

15 Sustainable Transport and Infrastructure

Strategic Objective

Improve active and sustainable transport choices across the Borough and beyond building on the success of the 'Enjoy Waltham Forest programme', encouraging wider integrated walking and cycling routes.

Ensure timely, strategic and local infrastructure investment and delivery to support good sustainable growth for communities both now and in the future, through working with partners, investors, developers and providers.

15.1 This chapter covers Sustainable Transport and Digital Infrastructure. Transport is fundamental to development in Waltham Forest. At the same time, it has a profound and personal impact on individual lives. In many cases, transport involves choice - whether to walk, cycle, take public transport or a private car. However, choice in many situations could be limited by personal factors, travel conditions, inadequate investment or other local circumstances. Transport is also a driver as well as a marker of economic development. It connects individuals and communities, facilitates access to job opportunities and for businesses to connect goods to markets, linking to the global marketplace.

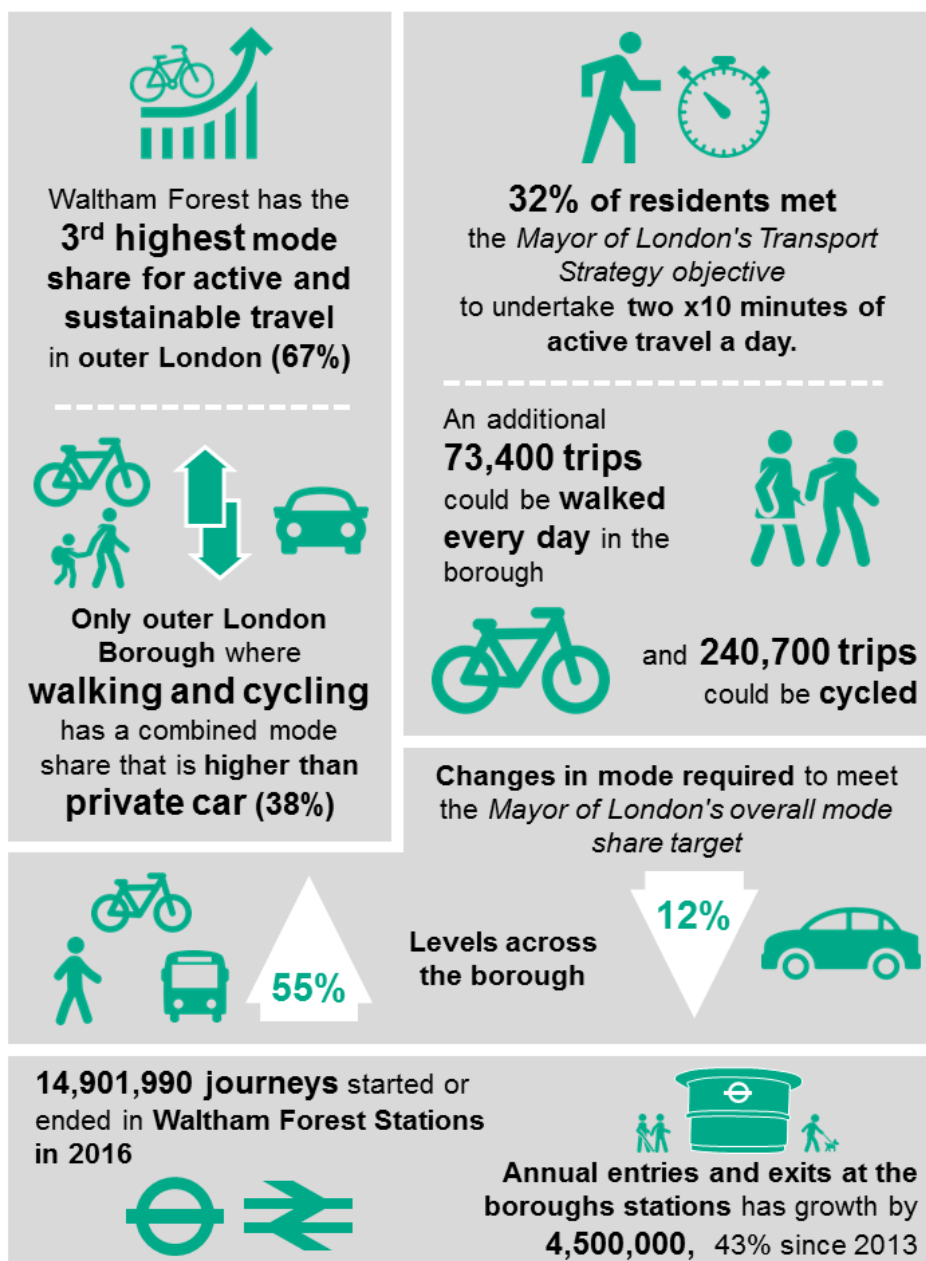
15.2 The Council's Digital and Technology Strategy 2018 sets out the importance of connectivity to growth in Waltham Forest. The services enabled by digital technology will benefit residents through the potential for economic growth drivers and jobs in addition to delivering Council's services such as libraries and social care. The internet has created entirely new fields of commerce which did not exist some years ago, and its impact extends to all sectors enabling new capabilities, products and services. With the advent of 5G, the quality, speed and extent of connectivity are important factors not just for local residential communities but also for future business and economic decisions, including where companies decide to expand or locate new facilities.

Sustainable Transport

15.3 Waltham Forest's Transport Infrastructure Investment Strategy, Vision 2020 for Cycling, and Local Implementation Plan 3, set out the borough vision for a transport network that improves the quality of life of all residents, and unlocks significant opportunities for growth. Central to this is delivering an accessible, future-proofed public transport network that allows residents and business to access opportunities, while creating liveable neighbourhoods that share the benefits of active travel across all people that live in, or visit the borough.

15.4 Waltham Forest is committed to meeting the Mayor of London's Transport Strategy objectives to deliver a transport network that improves the health and wellbeing of all Londoners, and to achieve an 80% mode share for active and sustainable travel by 2041. To achieve this target, a significant shift towards walking,

cycling and public transport use is needed over the next 20 years. Development will be expected to contribute to these aims by enhancing local active and public transport networks, and minimising need to travel through good design and location.



Policy 67**Liveable Neighbourhoods for All**

Development will be supported where it contributes to the Council's objective to deliver Liveable Neighbourhoods for all residents in Waltham Forest by:

- A. Contributing towards enhancing streets to meet Healthy Streets indicators across the public realm in the borough;
- B. Increasing the number of trips made by walking, cycling and public transport, and improve local connections to these modes;
- C. Reducing motor dominance and increase the active use of streets and public spaces;
- D. Provide legible, prominent and coherent wayfinding for walking and cycling to strategic and local active travel networks, public transport hubs, amenities, schools and green spaces.
- E. Being permeable for active modes of travel, and prioritise road space for cycling, walking and public transport;
- F. Creating safe neighbourhood environments, including reducing road danger, improving personal security and meeting the Mayor of London's Transport Strategy objective for Vision Zero;
- G. Improving air quality to create more attractive neighbourhoods for residents and visitors;
- H. Improving quality and resilience of the public realm, ensuring public space is accessible for people from all walks of life;
- I. Ensuring neighbourhoods have good connections to public transport.

15.5 Delivery of vibrant, liveable neighbourhoods, which increase the active use of streets is essential to sharing the physical and mental wellbeing benefits of physical activity amongst people who travel within Waltham Forest, and meeting the aims of the Mayor of London's Transport Strategy.

15.6 As set out in the Waltham Forest Local Implementation Plan 3, delivery of safe, active, and low traffic neighbourhoods is a proven approach to improving the health and wellbeing of communities. Drawing on the Transport for London (TfL) Healthy Streets principles, the Council aims to realise these benefits through creation of liveable neighbourhoods for everyone, which reduce the impact of motor traffic on air quality, climate change, congestion and road safety, and rebalance street space towards people who walk, cycle, and spend time in their local streets

15.7 The liveable neighbourhoods approach has been at the forefront of the borough's Enjoy Waltham Forest programme, which has delivered significant change in how people use their streets. Indicatively, where street changes have been delivered to reallocate street space for people who travel by foot or by bicycle,

residents spend an extra 32 minutes per week walking, or nine minutes a cycling. It is estimated that this has the potential to increase life expectancy of residents of these areas by seven to nine months by reducing health risks caused by inactivity.

Policy 68

Walking and Cycling

Walking

Where appropriate, development is expected to:

- A. Contribute towards the delivery of Liveable Neighbourhoods for all, through enhancements to walking connections to local destinations, transport hubs and amenities;
- B. Maximise opportunities to increase permeability of the in and around the development for people travelling by foot, bike or public transport.

Cycling

Where appropriate, development is expected to:

- A. Contribute and support the delivery of strategic or local cycle networks in the borough;
- B. Provide accessible, secure, and convenient cycle parking for all users, located in prominent locations, which meet or exceed Waltham Forest cycle parking standards, London Plan requirements and London Cycle Design Standards;
- C. Deliver accessible cycle parking for people using cargo bikes or adapted cycles, and for people who may not be able to lift bikes;
- D. Provide well-designed, accessible facilities including prominent and well-located showers, changing rooms and lockers.

15.8 As stated in the Mayor of London's 'Healthy Streets for London' report, increasing physical exercise presents an important tool to tackling many of the borough's health challenges, including heart disease, adult and child obesity, diabetes, and mental health problems. While Waltham Forest enjoys a higher than average mode share for active travel across outer London, there is significant potential to increase this number, and it is estimated by TfL that 240,700 more trips could be cycled every day in the borough, and 73,400 could be walked.



15.9 Consistent with the aims of the TfL Walking and Cycling Action Plans, the borough is committed to delivering continued street improvements that enable people build active travel into their everyday lives. Central to achieving this aim is the removal of barriers that deter people from walking and cycling, including concerns around road danger, high traffic volumes and speeds, lack of dedicated

infrastructure, and poor legibility to support journeys.

15.10 Figure x shows the Council's future strategic cycle network as set out in the 2020 Vision for Cycling in Waltham Forest. The network will provide safe, attractive cycle network that meets the Mayor of London's aim for 70% of residents to live within 400 metres of the London-wide cycle network. Alongside the strategic network, the Council aims to deliver a permeable, low-traffic cycling network within residential areas, offering ultimate route choice for users. When combined, the network will provide comprehensive connections between homes, town centres, growth areas and employment areas, schools and the wider cycle network.

Policy 69

Public Transport

Development should support and enhance public transport connectivity across the borough by:

Buses

- A. Ensuring impacts on capacity or operation of the bus network are mitigated through financial contributions or highways improvements. Assessment of impacts should include cumulative effects from surrounding development;
- B. Requiring major development in areas of low bus provision to contribute towards improving connectivity and operation of the bus network (including bus priority works, providing new or extended bus routes, or increasing frequency of existing services).

Underground, Overground and National Rail

- A. Ensuring major development contributes to the delivery of new Rail, Underground, or Overground infrastructure, including capacity improvements, accessibility, public realm or step free access, to mitigate impact of development or to unlock potential for growth;

- B. Where appropriate, contributing to delivery of new public transport infrastructure and services where it is located in areas of low public transport accessibility;
- C. Safeguarding space to deliver future improvements to Underground, Overground and National Rail infrastructure, as detailed on the [infrastructure map].

15.11 Complementing the transformation of neighbourhoods, provision of a public transport network that is fit for purpose, accessible, and future-proofed is vital to unlocking future growth and improving the life chances of people who live and work in Waltham Forest.



15.12 While the borough has strong connections to Underground, Overground, National Rail, bus and active travel networks, significant improvements are needed to ensure infrastructure is able to support changing demands of residents, businesses and visitors. To support the Council's ambitious plans for regeneration and growth, the LBWF Transport Investment Strategy and LIP3 has identified a number of major rail and bus projects to improve the local and London-wide connectivity. In addition the borough is set to benefit from its proximity to the Elizabeth Line and, in future, Crossrail 2 which will unlock development potential in the south and the west of the borough.



15.13 Priority measures include increasing capacity and comfort of existing public transport infrastructure, as well as enhancing the current transport network through delivery of new interchanges and connections. It is also essential that the public transport network meets the needs of a changing population, placing emphasis on delivering a fully accessible transport network by expanding the step-free network, and

accessible links to and within public transport hubs across Waltham Forest.

15.14 New development will be expected mitigate the impact on local public transport services, as well as improving connectivity when they are under-served. For example, the bus network is critical to unlocking development potential in the identified growth areas, which in some cases, are underserved by public transport. The borough is committed to working with TfL and developers to unlock funding for bus services, in addition to supporting new methods of bus travel that hold the potential to support wider growth in the borough.

Policy 70**Deliveries Freight and Servicing**

All development within the borough should seek to minimise the adverse impacts of deliveries, freight and servicing by:

- A. Reducing the number freight, servicing and delivery trips to and from developments at the operational and construction phases;
- B. Managing freight and servicing by utilising local and area wide facilities to consolidate and time deliveries;
- C. Operating facilities and measures to reduce waste collection trips, such as consolidated waste collection for businesses, and underground waste storage;
- D. Arranging deliveries outside of peak hours and in the evening or night-time;
- E. Managing road danger resulting from freight and servicing vehicles by using suppliers that meet Fleet Operator Recognition Scheme (FORS) Silver standard Using zero emission vehicles, such as cargo bikes and electric vehicles, for servicing trips last mile deliveries;
- F. Where appropriate, promoting facilities to enable efficient online retailing and minimise additional freight trips arising from missed deliveries, including storage lockers or concierge services;
- G. Incorporating Delivery and Servicing Plans as part of scheme design, and submitting these as part of planning applications.

15.15 When unmanaged, the movement of goods and servicing vehicles to and from developments can create significant impacts on local environments; including high levels of HGV, LGV and white van traffic, increased levels of air pollution, a reduction in road safety for vulnerable users, and experience of streets for those travelling actively.



15.16 In Waltham Forest, while vehicle kilometres driven has reduced, the Department for Transport estimate that between 2013 and 2016 there has been an increase of 23% in Light Commercial Vehicles and HGVs, which make up 20% on traffic on these roads. The borough is committed to working with developers and TfL to reduce the levels and impact of construction, servicing and delivery freight, utilising best

practice guidance, such as in the TfL Freight and Servicing Action Plan.

15.17 New development is expected to apply innovation to change construction and operational practices around freight and deliveries. Examples of this already applied in Waltham Forest include reducing, consolidating and re-timing deliveries, promotion of Zero Emission Deliveries, installation of delivery lockers on sites, and waste consolidation to reduce the number of collection trips made to site.

Policy 71

Construction Logistics Plans

All residential and commercial development in the borough should enable efficient and sustainable servicing and deliveries and should provide an outline Construction Logistics Plan (CLP) as part of the planning process. This should include:

- A. A risk-assessment on the potential impact on the local community and the community engagement activity proposed
- B. Safe routes to the site for construction traffic that minimise manoeuvres that place other road users at risk, and avoid areas with levels of vulnerable road users, including schools, town centres and areas with high density of pedestrians and cyclists;
- C. Approach to consolidating freight deliveries with other local and regional development sites or using consolidation facilities;
- D. Minimising road danger resulting from construction vehicles by using suppliers that meet Fleet Operator Recognition Scheme (FORS) Silver standard;
- E. Using the safest vehicles, including those that meet direct vision standards, and use features such as pedestrian and cyclist autonomous emergency braking, intelligent speed assistance and alcohol interlock systems;
- F. The suitability of the site and its ground conditions to enable the adoption of vehicles that are fitted with enhanced vulnerable road user safety features
- G. Traffic control and marshalling at the site access and egress point to ensure safe movement of vehicles on and off the public highway and across the footway
- H. Site delivery and collection management and locating all vehicle loading and unloading facilities within the boundary of major development, to minimise impact on local transport network;

Where appropriate, Detailed CLPs will 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.

All applications should apply guidance and template provided by Transport for London for CLPs.

In locations with high levels of development, Area-wide CLPs will be developed by the Council. Development within areas covered by Area-wide CLPs will be expected to adhere to these plans by developing site specific CLPs that conform the Area CLP, and where appropriate, contribute to their development.

Throughout the development CLPs should be monitored to ensure they are adhered to and reviewed and updated prior to the start of each new phase of construction.

15.18 CLPs are a key tool in managing the environmental and safety impact of freight and deliveries to construction sites, and will be requested for all sites by the borough. When applied, this will enable reduction the of volume and risk of construction freight, consolidation of vehicle movements, retiming of deliveries out of peak hours, avoid areas and times with high levels of vulnerable road users and shift road based deliveries towards other modes such as rail and water based modes.

15.19 In addition to reducing the environmental impacts of construction, effective application of CLPs delivers wider benefits to applicants by enabling reduced costs through efficient, well-planned working practices and the reduction in the frequency and volume of deliveries. The use of logistics and consolidation centres provide wider benefits, including reduced risk of theft of materials on-site, consolidation of vehicle movements, a more secure supply chain, and shared waste management.

15.20 Detailed CLPs will be required from sites that are deemed to have the potential to detrimentally impact safety, congestion, or the environment through construction practices. This includes sites that:

- Will generate high levels of construction traffic to the site;
- Will impact local and regional road capacity and congestion throughout the construction stages;
- That increase the cumulative impact of construction traffic or movements within the local area;
- Are located in close proximity to areas with high levels of vulnerable road users, including strategic locations within the borough, such as town centres or public transport hubs, or in close proximity to the borough cycle network;
- Are located in close proximity to the borough or TfL strategic road network.

Policy 72**Managing Vehicle Travel Traffic**Car Parking Standards

Development will be supported where:

- A. It is car free in South Area, Central Area, and locations that are, or planned to be, well-connected to public transport, active travel networks, and amenities within the North Area of the borough;
- B. Car parking ratios outside the car-free area are within maximum parking ratios to be proposed in future Local Plan consultation. This will be based upon levels of current or future public transport connectivity;
- C. Disabled parking is provided for all development, including car-free proposals, in line with standards set out within the Draft London Plan.

Operational parking for business and industry uses will be permitted when need is clearly demonstrated within the Transport Assessment, and measures have been applied to minimise number of vehicles, frequency and impact of trips. All operational vehicles should use Electric vehicles.

Development will be resisted where anticipated car parking and vehicle use will impact the delivery of liveable neighbourhoods, or increase congestion and parking stress.

Parking Management

Where parking is provided as part of a development, it will be expected to:

- A. Submit a Car Parking Management Plan detailing mechanisms for leasing spaces, providing disabled parking to meet future demand, and activating passive electric charge points.
- B. Include a car-free agreement within Section 106 agreements, restricting new residents from accessing parking permits within controlled parking zones.
- C. Where appropriate, provide financial contributions to delivery of controlled parking zones where roads in close proximity to the site are not managed, or adequately managed by parking controls.

Estate Regeneration

- A. Where car parking is re-provided as part of Council housing estate regeneration schemes, car parking should be reduced to meet the minimum need of returning residents. Where car parking exceeds Council parking standards, evidence of parking need should be provided.
- B. Re-provided car parking spaces for existing residents should at no point be offered to new residents.

Car Clubs

- A. Where appropriate, development will be required to contribute to the borough's public car club network, by providing spaces on site or contributions to deliver bays on-highway. Residents should be supported to use schemes by free membership and active promotion.



15.21 As outlined in the TfL Healthy Streets for London Report, car ownership is a key determinant of transport choice and car use across London. Effective management is essential to reducing private car travel, and realising the health and wellbeing benefits of improved air quality, decreased noise disturbance and local congestion, and increased physical activity.

15.22 Following the objectives of the London Borough of Waltham Forest's Transport Growth and Investment Strategy and LIP3, Waltham Forest is committed to accelerating London-wide trends towards car-free and low-car development, and have set maximum car parking standards to reflect this.

15.23 Car-free lifestyles are a viable option for development within areas that are well connected to public transport, active travel networks, and local amenities. Between 2016 and 2018, 48 car-free developments in Waltham Forest were secured through Section 106 agreements, delivering an average parking ratio of 0.1 spaces per unit across 3,043 new homes. This follows an upwards shift in people travelling by foot, bicycle and public transport in Waltham Forest, and a five per cent reduction in the number of car kilometres driven on borough roads since 2016 (the third highest decrease across all boroughs).

15.24 The Council recognises that less-well connected areas may require some levels of car—parking within new development, and this will be reflected within forthcoming maximum parking standards, supported by a robust evidence base.

15.25 Car clubs also provide an important role in supporting people to transition away from car ownership, especially when paired wider incentives, such as management of residential parking, improvements in public transport, and new cycling and walking facilities. It is shown by CarPlus, which car club members are more likely to walk, cycle or take public transport, and that 28% of car club members based in London have reduced the number of vehicles owned by their household since joining a car club.

Policy 73

Electric Vehicles

Where development provides car parking or increased vehicles on borough roads, it should accelerate uptake of electric vehicles by:

- A. Providing infrastructure for electric vehicle charging, including a minimum of 20 per cent of spaces to have active charging facilities, with passive provision for all remaining spaces;
- B. Demonstrating within car parking management plans how occupants using electric vehicle charge points will be charged fairly and consistently, and how the number of EV charge points will be increased to meet demand;
- 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;
- D. Contributing the boroughs publicly accessible rapid charging and on-street charging network, especially where development is served by electric vehicles for deliveries and servicing.

15.26 Despite a reduction in kilometres driven, vehicle emissions continue to be the primary pollution source in Waltham Forest. The highest pollution concentrations are seen on the two TfL Strategic Road Network roads, the A12 and A406 North Circular Road, however pollution remains high on many local roads, impacting residential streets, town centres and services such as schools and leisure centres, which surround them. It is estimated that 50 Waltham Forest residents a year are admitted to hospital as a result of exacerbation of asthma due to air pollution from vehicle emissions (including 13 children and 27 people aged over 65).

15.27 Accelerated uptake of electric and ultra-low emission vehicles is essential to delivering improvements to air quality and a zero-emission transport network in Waltham Forest. Electric Vehicle (EV) ownership in Waltham Forest is expected to rise by 700% by 2025, (177 to 2,457), and the Council aims to deliver full coverage of charging infrastructure by 2022. Although new development is expected to minimise vehicle travel, when it increases resident and servicing vehicles on the road network, development will be expected to contribute to the uptake of EVs, and delivery of charging infrastructure.

Policy 74**Assessing, Mitigating and Monitoring Transport Impacts**

To effectively assess the impacts of development and agree suitable mitigations, where appropriate development should submit the following documentation:

- A. A Transport Assessment showing how the development will contribute towards meeting local and London-wide transport objectives, and detail measures to achieve this (including street improvements, on-site facilities, and engagement).
- B. A site Travel Plan detailing how development will enable walking, cycling and public transport use amongst users, including agreed targets, implementation and funding, and monitoring regime.
- C. Construction Logistics Plan (CLP) setting out the potential impacts of construction traffic, and how this will be reduced. An Outline CLP should be submitted at application stage, followed by a Detailed CLP at the pre-construction phase.

15.28 Where improvements are identified through the Healthy Street Transport Assessment, major developments will be expected to make financial contributions to improving local walking networks between development and local trip generators (public transport hubs, schools, GP surgeries, district centres), and local and strategic cycle network in Waltham Forest.

15.29 In order to fully assess the impacts of new developments on the transport network and to ensure development contributes to encourage walking, cycling and public transport use, Transport Assessments, Travel Plans and Construction Logistics Plans will be required in support of planning applications. These should be prepared in accordance with current best practice guidance, including the Transport for London Healthy Streets Transport Assessment (2019), Travel Plan Guidance (2019), and Construction Logistics Plan Guidance (2017).

Utilities and Digital Connectivity

15.30 Utilities have a vital role to play in facilitating sustainable growth in the borough as quality of life and social well-being vitally rely on the supply of high quality, reliable and affordable utilities, including digital connectivity.

15.31 High speed digital connection is now widely seen as an everyday essential alongside traditional utilities such as water, gas and electricity. There has also been a strong shift away from traditional models of working, retail and service delivery; with many residents in the borough operating businesses, working remotely and ordering goods and services from home. This highlights the importance of fast, reliable and affordable digital connection to the local economy. Creative businesses in particular are especially reliant on fast and reliable digital connectivity.

15.32 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 - thereby reducing demand on public transport and improving air quality whilst at the same time promoting productivity and the overall economy.

15.33 This policy seeks to ensure that all new developments incorporate next generation mobile technology (such as 5G) and to ensure that full fibre broadband connections are incorporated into new developments.

15.34 The Council has strong links with the various infrastructure providers that service the borough, including Thames Water, UK Power Networks, Cadent (Gas), National Grid and various digital connectivity providers. The continuation of this cooperative working relationship is key to ensuring delivery of this policy. Developers, landowners and building occupants also have a role to play in demand management, early engagement with utility providers and co-operative working to avoid disruption.

15.35 Further information on necessary and planned utility infrastructure improvements will be set out and updated annually in the Council's Infrastructure Delivery Plan (IDP).

Policy 75

Utilities Infrastructure

Development proposals will be expected to:

- A. Submit infrastructure delivery plans to demonstrate sufficient infrastructure capacity to support the proposed development from commencement. Where there will be a deficit, the developer will be expected to ensure that relevant infrastructure will be provided as part of the proposals;
- B. Utility infrastructure and connections must be designed into the development wherever possible. As a minimum, developers should identify and plan for:
 - i. Electricity supply should be identified with providers as part of development proposals
 - ii. Gas and water supply considering the need to conserve natural resources; and
 - iii. Heating and cooling demand and the viability of its provision via decentralised energy (DE) networks.
 - iv. Have entry and connection points within them from utility providers

15.36 Early engagement with infrastructure providers is essential to ensure that sufficient capacity is available in the wider infrastructure network to service the development in both the construction and operational phases, and that suitable connection layouts and future-proofing are considered early in the design stage. In

some circumstances it may be necessary for developers to carry out studies to see if the proposed development will lead to overloading of existing infrastructure. Adequate time should be allowed to consider supply options concerning the construction and operational phases to allow utility providers to provide an informed response. Realistic projections of electricity demand should be provided in order to promote efficient delivery of necessary infrastructure. The cumulative impact of proposed developments in the proposals' vicinity must be taken into account through discussions with utility providers and at pre-application meetings with the Local Planning Authority. Co-ordination of infrastructure works is essential to minimise the level of disruption and impact on existing services associated with provision.

15.37 The Sustainability/Energy Statement which accompanies the application may be used to demonstrate engagement with utility infrastructure providers and set out the demand management measures that are to be incorporated. The Sustainability/Energy Statement may include a joint statement of intent endorsed by the relevant utility providers. Section 106 agreements may be used to ensure continued engagement regarding route planning and confirmation of load demands.

Policy 76

Digital Infrastructure

To ensure residents and businesses have access to high quality digital connectivity, all new developments should:

- A. Ensure that sufficient ducting infrastructure is provided;
- B. Maximise opportunities to provide affordable digital connectivity, including both wired and wireless technologies;
- C. Support the effective use of public realm to accommodate well designed and located mobile digital infrastructure;
- D. Meet or exceed digital connectivity speeds than set out in Part R1 of the Building Regulations;
- E. Consider opportunities to improve digital infrastructure;
- F. Support smart city principles.

15.38 The volume of planned development in the borough and the congestion of cables and pipes under the borough's streets create a challenge for new infrastructure to be installed without causing disruption to the borough's public realm and street network. Pipe subways and ducting provide a means of reducing the level of disruption during installation and when undertaking maintenance of infrastructure. Existing subways and ducting must be used wherever possible for the installation of utility infrastructure. Expansion and integration of pipe subway, ducting infrastructure and decentralised energy networks is a long term aspiration of the Council in order to both improve coverage and to minimise any disruption due to utility works.

Extensions to existing pipe subway or ducting networks will be sought where there is adequate evidence that services to developments would be better integrated within an established network in the vicinity.

Risk Management

15.39 Fluctuations in the economic cycle may reduce the level of funding available for infrastructure upgrades but will also impact on the need to expand infrastructure. The borough will consider the demand for, and funding of, infrastructure improvements through the Infrastructure Delivery Plan (IDP), prioritising the allocation of funds where necessary.

15.40 Climate change could alter future infrastructure demand patterns. For example, greater need for air conditioning in summer months could create demand more demand for electricity. The Local Plan addresses this by requiring sustainable building designs.

15.41 Changing business practices, e.g the reducing prominence of traditional industries, or changes in the boroughs business mix, may impact on the level of utilities required and the spatial distribution of demand. Continued monitoring of trends will highlight any issues in this respect, identifying any need to review this policy or the Infrastructure Delivery Plan (IDP).

15.42 Rapidly changing technology and infrastructure needs may impact on the visual amenity, character and appearance of the borough. The Council will work with utility providers to ensure that new infrastructure proposals are designed and sited to minimise any such adverse impacts.

16 Enhancing and Preserving our Heritage

Strategic Objective

Ensure Waltham Forest's network of cultural, inclusive and sustainable neighbourhoods are safe and diverse, celebrating their locally distinctive character and heritage.

16.1 Waltham Forest has a rich multi-layered historic environment that contributes significantly to the distinctive and unique identity of the borough, adding to the quality of life and well-being of all who study, live, work or visit the borough.

16.2 Whether in the form of individual listed buildings, conservation areas or other heritage assets such as below-ground archaeology, protecting and enhancing this heritage is an important aspect of the role the Council plays on behalf of the community in fulfilling the government's key planning principles, as set out in the National Planning Policy Framework (NPPF).

16.3 The borough has a positive strategy for the conservation and enjoyment of the historic environment that includes;

- Guidance and advice for owners and developers in relation to the historic environment and how its assets should be conserved.
- Identifying and managing heritage assets at risk through neglect, decay or other threats, and seeking their return to appropriate and sustainable use.
- A continuing programme producing and reviewing Conservation Area appraisals and management plans.
- Continuing to work closely with heritage organisations such as Historic England, national and local amenity societies and other relevant stakeholders in considering proposals affecting heritage assets within the borough, and in promoting and raising awareness of local heritage matters generally.
- Support for local communities in promoting, valuing and identifying other locally significant historic buildings and heritage assets within the borough, including producing a Local Heritage List.

16.4 The protection of heritage assets is a key consideration in assessing development proposals, and all development will be required to protect the significance, character, appearance and setting of heritage assets, whether nationally designated or non-designated, so that they are sustained for the benefit of existing and future generations. This is particularly important when considering non-nationally designated heritage assets.

16 Enhancing and Preserving our Heritage



**117 statutory
Listed Buildings**



**14 Conservation
Areas**



**171 entries on
the Local List**



**1 Area of Special
Character**



**20
Archaeological
Priority Zones**



**5 Parks and
Gardens of Local
Historic Interest**

Policy 77**Designated Heritage Assets**

- A. The Council will ensure designated heritage assets are preserved and enhanced within the planning process, with a strong presumption in favour of retention and enhancement, to ensure the borough's history, identity and sense of place is protected and maintained for existing and future generations.
- B. A heritage statement should accompany all applications that affect designated heritage assets, clearly explaining the significance of the asset, how it will be impacted by the proposal, and providing clear and convincing justification for any change.
- C. Any harm to designated heritage assets, irrespective of whether this would amount to substantial harm, total loss or less than substantial harm, will be given great weight in the planning process, and will require clear and convincing justification.
- D. Development proposals that lead to either substantial harm to or total loss of designated heritage assets will not be permitted, unless it can be demonstrated that such harm is necessary to achieve substantial benefits which could not be delivered otherwise, or all of the following apply:
 - i. the nature of the heritage asset prevents all reasonable uses of the site;
 - ii. no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
 - iii. conservation by grant funding or some form of charitable or public ownership is demonstrably not possible; and
 - iv. the harm or loss is outweighed by the benefit of bring the site back into use
- E. Development that leads to less than substantial harm to the significance of a designated heritage asset will not be permitted, unless the public benefit of the proposal, including securing the optimum viable use of the site, outweigh the harm caused.
- F. Proposals that sensitively and creatively bring designated heritage assets back into use whilst still maintaining their significance will be supported.

- **Designated Heritage Assets:** Conservation Areas; Statutorily Listed Buildings; and Archaeological Remains (in Archaeological Priority Zones).
- **Non-designated Heritage assets:** Locally Listed buildings; Parks and Gardens of Local Historic Interest; and the Highams Area of Special Character.



16.5 National planning policy places a strong emphasis on the conservation of heritage assets appropriate to their significance, with the more significant the asset the greater the presumption in favour of its conservation. This is irrespective of the degree of any potential harm that may be caused by a development proposal.

16.6 The Council will look favourably on proposals that creatively and sensitively reuse and adapt heritage assets, especially those currently not in use or which are on the At Risk Register.

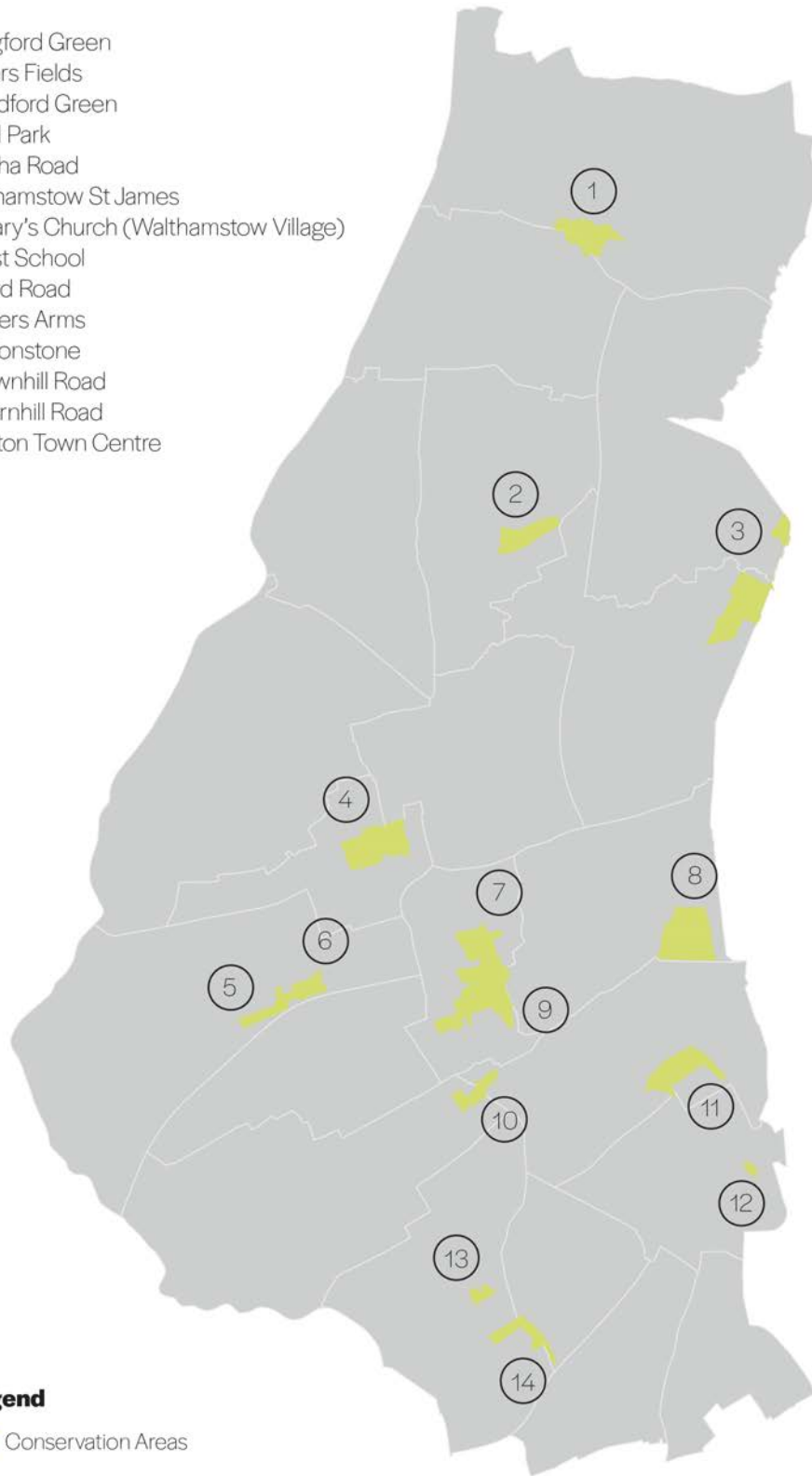
16.7 Not all of Waltham Forest's heritage is designated, and it is therefore important to recognise the value of our undesignated historic environment in planning for the future. Many buildings are of significance to the local environment, even though they may not be protected by law.

The Setting of Heritage Assets

16.8 In addition to the need to identify and assess the particular significance of any heritage asset that may be affected by a proposal, it is also essential to consider the impact of proposed development on the setting of such assets. The significance of a heritage asset derives not only from its physical presence and historic fabric but also from its setting – the surroundings in which it is experienced.

16.9 Historic England's [Setting of Heritage Assets](#) provides clear guidance on settings which the Council will take into account in the consideration of development proposals, and which applicants are strongly advised to refer to in bringing forward relevant schemes.

1. Chingford Green
2. Ropers Fields
3. Woodford Green
4. Lloyd Park
5. Leucha Road
6. Walthamstow St James
7. St Mary's Church (Walthamstow Village)
8. Forest School
9. Orford Road
10. Bakers Arms
11. Leytonstone
12. Brownhill Road
13. Thornhill Road
14. Leyton Town Centre

Legend Conservation Areas**Figure 16.1**

Policy 78**Listed Buildings**

- A. All proposals for listed buildings will be expected to conserve and enhance their appearance and significance.
- B. Reinstatement of historic building elements (e.g. roof coverings, rainwater and soil goods, windows and doors) should be carried out using traditional, historic or original material, employing specialist advice and craftsmanship.
- C. Extensions to listed buildings and new development within the curtilage of listed buildings should:
 - i. Be subservient to the host historic building in terms of location, floor area, height, massing and scale; and
 - ii. Respect the host historic building in terms of design, materials and detailing; and
 - iii. Respect the unity of groups of buildings (e.g. terraces) and the setting of nearby buildings; and
 - iv. Respect the historic character and extent of the curtilage in relation to the amount of garden or other open space.
- D. Proposals for the change of use of a listed building will only be permitted where it can be demonstrated that the proposed use is the optimum viable use, which causes the least harm to the significance of the building and its setting and secures its long term viability. Proposals that sensitively reuse listed buildings where original use has ceased and is no longer viable will be looked on favourably.
- E. Proposals for the demolition of listed buildings will only be permitted in exceptional circumstances. The fact a building has become derelict will not in itself be sufficient reason to permit its demolition or any substantial harm to its special interest.
- F. The Council will continue to work with Historic England in identifying listed buildings and structures that merit inclusion on the Heritage at Risk Register. Where such buildings are identified, the Council will work proactively with owners and other bodies to facilitate their successful restoration and reuse, consistent with their heritage value and special interest.

16.10 The Secretary of State compiles lists for all local authorities of buildings in their areas considered to merit statutory protection because of their special architectural/historic interest. All statutory listed buildings are of national significance and the statutory list for Waltham Forest is published on Historic England's website. (Section 1 of the Planning (Listed Buildings and Conservation Areas) Act, 1990).

16.11 The borough has a diverse range of listed buildings, from the late medieval Walnut Tree House in Leyton, or the civic grandeur of Walthamstow Town Hall, to the distinctive Moorish design of the former Granada Cinema. However, in numerical terms, they represent a finite asset and for that reason their loss/substantial demolition will not be permitted unless the Council is satisfied that every possible alternative approach for restoration, conversion or re-use has been thoroughly explored and found to be impracticable.



16.12 Section 7 of the Act states that prior consent must be obtained from the local authority before any demolition (in whole or in part), alteration or extension works go ahead which would affect the character of a building of special architectural or historic interest. It is a criminal offence to carry out any such works without consent.

16.13 Together with Historic England the Council maintains a Heritage at Risk Register, highlighting listed buildings that are assessed to be at risk for a variety of reasons, be that vacancy, deterioration of fabric, or poor structural condition. The Heritage at Risk Register is a fluid document which changes each year, but at present there are 15 sites on the register, including several churches, a cinema, a water pumping station, and residential Georgian properties.

16.14 The purpose of the register is to monitor and provide the basis for solutions to the issues these buildings face, and the Council will therefore work with owners to facilitate the successful refurbishment and repair of these assets, with the longterm objective of putting them back into viable and sustainable uses.

16.15 Appropriate temporary uses will also be considered that could prevent further decay of the asset, provide improved security and allow an increased prospect of sustainable re-use. The Council may also be able to offer assistance and advice on external grant giving bodies.

16.16 The most viable use for a heritage asset may not be the use for which it was originally intended, and proposals that bring At Risk Buildings back into sustainable uses that maintain and enhance the buildings significance will be looked on favourably.

Policy 79

Conservation Areas

In order to preserve or enhance the borough's conservation areas, including their respective significance, character, appearances and settings, the Council will:

- A. Permit development which preserves or enhances the character or appearance of the area.
- B. Only permit the demolition of any building in a conservation area where it is clear that this would not have an adverse effect on the character or appearance of the area. In cases where demolition may be justified in accordance with national policy, consent to demolish will be given only when acceptable plans for redevelopment have been agreed.
- C. Use Article 4 directions to raise awareness of good conservation practice and encourage property owners to implement appropriate improvements to properties and other heritage assets which preserve or enhance the character of conservation areas.
- D. Preserve any tree which contributes to the character of the conservation area.
- E. Identify and designate, where appropriate and with public consultation, new conservation areas in the borough.
- F. Appraise and reassess the borough's existing conservation areas, periodically reviewing character appraisals and management plan documents.

16.17 Complementary to its aim of improving the environment of the borough as a whole, the Council seeks to conserve, and, wherever possible, enhance those buildings and areas which are of special value. This can be achieved by designating Conservation Areas, recognising special character and historic significance of wider areas beyond that of individual buildings or structures. To date 14 such areas have been designated.

16.18 The borough's Conservation Areas vary in character, and include the well-preserved medieval heart of Walthamstow Village, the cohesiveness of the Warner housing developments in Lloyd Park and Leucha Road, and the vibrant town centres of Leyton and Chingford, amongst others.

16.19 Proposed developments will be expected to pay close attention to the character of each conservation area, taking into account typical features and styles of existing development, maintaining features of interest, and better revealing features that may have been hidden over time or which require reinstating.

16.20 Proposals that affect individual properties within conservation areas will be assessed on their impact on the individual building, as well as on the impact on the character of the conservation area as a whole.

16.21 The Council currently has Article 4 Directions in place for nine of its fourteen Conservation Areas. The use of Article 4 Directions is in recognition of the harm that can often be caused to character and appearance by inappropriate changes such as the replacement of traditional timber windows and doors with modern plastic alternatives, natural roofing materials such as clay and slate tiles with concrete and plastic tiles, poorly located satellite dishes, removal of original chimney stacks and changes to front gardens with hardstanding for vehicles.

16.22 The Council will therefore use this mechanism to ensure good management of Conservation Areas by encouraging appropriate changes to residential properties so as to preserve or enhance the character of the Conservation Area. When considering changes to properties within a Conservation Area, applicants are advised to contact the Council's Conservation Officer for further specialist advice.

Policy 80

Archaeological Priority Zones

Proposals which affect Archaeological Priority zones will be supported where they provide:

- A. Details of measures that will protect and, where appropriate better reveal, remains of archaeological importance by ensuring acceptable methods are used, proportionate to the significance of the asset. This will include preserving the asset and its setting, including physical preservation in situ where appropriate.
- B. Desk-based assessments will be required for proposals within designated Archaeological Priority Zones to evaluate impacts on any below ground archaeology. Further investigation works, including trial pits, may also be required.
- C. In cases where loss of the asset is justified in accordance with national policy, the remains should be appropriately recorded, assessed, analysed, disseminated and the archive deposited.

16.23 The history of Waltham Forest dates from the time of the earliest Bronze Age settlements in the Forest. Archaeology is an important way in which greater knowledge about the history of the borough can be discovered. However, the opportunity to carry out archaeological investigations often only arises when construction work begins.

16.24 The Greater London Archaeology Advisory Service (GLAAS), part of Historic England, provides archaeological advice to local authorities, developers and their agents, and local people. They maintain the Greater London Historic Environment Record (formerly the Greater London Sites and Monuments Record) and have defined 20 Archaeological Priority Zones (APZs) in the borough for their particular archaeological interest.

16.25 For archaeological sites over 0.4 hectares within APZs, the Council will consult GLAAS for their expert advice, and applicants/developers will be expected to provide desk based assessments and potentially facilitate open trench investigations prior to development taking place.

Policy 81

Non-Designated Heritage Assets

- A. Non-designated heritage assets will be protected and conserved appropriate to their significance, with a strong presumption in favour of their retention and sympathetic maintenance and enhancement.
- B. Substantial harm and complete loss of non-designated heritage assets will not be supported.

16.26 Non-designated heritage assets may be buildings, other structures or features and historic areas not designated in legislation. As the borough has fewer designated heritage assets than other local authorities, protection of non-designated assets will be given significant consideration when assessing proposed development.

Policy 82

Locally-Listed Buildings

- A. The Council will seek to protect and retain locally listed buildings, recognising their architectural and historic interest that makes them significant to the borough.
- B. Total loss of locally listed buildings will be strongly resisted, with clear and robust justification required for demolition.
- C. Alterations or extensions to locally listed buildings will be expected to achieve a high standard of design, paying close attention to the special interest of the locally listed building and its setting.

16.27 The Council maintains a list of buildings of local architectural and historic interest separate to those on the Secretary of State's statutory list for the borough. These buildings are not subject to additional statutory controls, but the Council will encourage their preservation through its normal town planning controls, with a firm preference for their retention as part of development.

16.28 Due to the limited number of statutory listed buildings within the borough, locally listed buildings are considered to take on a greater significance than might be found elsewhere. As a result, the council will be preparing an SPD document to provide greater clarity on preserving, enhancing and managing locally listed buildings.

Policy 83

Highams Area of Special Character

- A. The Council recognises that the Highams Area of Special Character has local architectural and historic significance that merits protection in the planning process.
- B. Development proposals will be expected to pay close attention to the area's defined character, making use of appropriate materials.

16.29 The Highams Area of Special Character was designated by the Council in 1988 in recognition of the area's cohesive architectural and landscape quality. Although not deemed to be of sufficient interest to be merit conservation area designation, and not therefore a statutory consideration within the planning process, the Council seeks to ensure the area's special interest is protected.



16.30 The Council will make an Article 4 Direction to ensure elements of the character of the estate are preserved and enhanced through the planning process.

17 Protecting and Enhancing the Environment

Strategic Objective

Enhance the Borough's natural environment and develop a multi-functional network of green and blue infrastructure to deliver benefits for all, including increased public access.

17.1 The borough has an extensive resource of easily accessible green and blue infrastructure which includes parks, wetlands, reservoirs, forest and open spaces. From Epping Forest at the north and east of the Borough and the Walthamstow Wetlands and Lee Valley Regional Park to the south and the west, Waltham Forest is one of the greenest London Boroughs. This plan seeks to maximize the valuable benefits of the borough's parks and open spaces as places which:

- provide healthy recreational opportunities for both body and mind
- are richly biodiverse environments and places to visit and experience nature
- create the setting for highly quality cultural neighbourhoods, linking development and greenspace
- increase the resilience of the borough's built environment to climate change and flooding

17.2 The borough's natural green spaces in Epping Forest and the Lee Valley Regional Park are augmented by parks. The Council's Open Space Needs Assessment (2018) identifies seven Premier Parks in the borough:

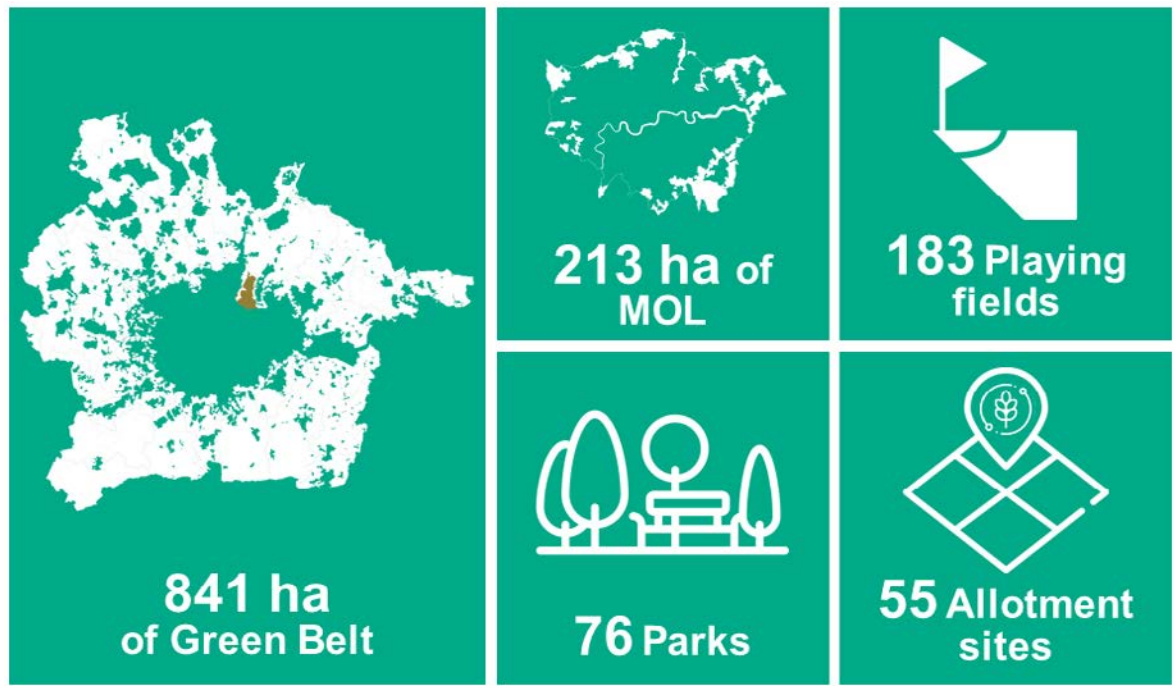
- Abbots Park
- Coronation gardens
- Langthorne Park
- Lloyd & Aveling Park
- Memorial Park
- Ridgeway Park
- Leyton Jubilee Park (which has recently been expanded by the new sports facilities and parkland at Ive Farm)

17.3 The premier parks are supplemented by a network of smaller less formally - managed parks throughout the borough such as Sidmouth Park in Leyton which provide opportunities for activities such as dog walking and play for children.

17.4 At a wider scale, cumulatively Green Belt and MOL account for 27% of the borough's land area. The NPPF (Para 134) sets out the important functions that the Green Belt has in assisting urban regeneration by encouraging the recycling of derelict and other urban land by preventing encroachment and urban sprawl through inappropriate development. Whilst Metropolitan Open Land (MOL) has a similar

degree of protection as strategic open land, its protection derives from the London Plan and its purpose is to provide open breaks in the urban area in order to maintain the structure of London

17.5 Overall, the borough's green and blue spaces are a vital asset inset in the urban fabric which further the physical and mental health and wellbeing of the borough's residents. As such it is to be protected and enhanced by the policies in this plan.



Policy 84**Green Infrastructure and the Natural Environment**

Proposals will be supported where they contribute to :

- A. The preservation and enhancement of green and blue infrastructure and access to open spaces by:
 - i. Protecting Green Belt and Metropolitan Open Land (MOL) and improving active access for pedestrians and cyclists where appropriate;
 - ii. Delivering development and regeneration activity principally through the use of brownfield land and buildings.
- B. Where development proposals are allowed in exceptional circumstances in Green Belt or MOL within the meaning of national policy and the London Plan, they should :
 - i. Implement a high standard of design in accordance with the principles set out in (design policies)
 - ii. Complement and improve the quality of existing open space uses and landscaping
 - iii. Enhance the green infrastructure network through better connectivity and the creation of new open spaces whilst also conserving their natural and historic value;
 - iv. Establish and/or extend the Borough's Greenways, Green Corridors and provide landscaping along transport routes where possible; and
 - v. New development adjacent to existing Green Chains and Green Corridors must be designed in a way that contributes towards the green infrastructure network.
- C. Development proposals should enhance the value of existing open spaces by:
 - i. Responding to the character and significance of the space;
 - ii. Optimising physical and visual access between development and open space;
 - iii. Increasing biodiversity value.
- D. New high quality and usable open spaces and/or landscape infrastructure must be provided in major new developments. Where new development cannot contribute to usable open space provision or landscaping on-site, or provision is deemed insufficient to the scale and nature of the development, financial contributions will be sought.
- E. Proposals for new areas of open space and landscape provision must be accompanied by a maintenance plan for adopted and non-adopted areas as a

requirement of planning permission to ensure their long-term successful establishment.

- F. In areas of deficiency as referenced in the Council's Open Space Strategy, proposals should include measures for improving the quality of and access to open spaces.

17.6 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 Metropolitan Open Land (MOL) which provides strategic open land within the urban area. Together, Green Belt and MOL provide some of Waltham Forest's most important natural resources, making a valuable contribution to the London-wide green infrastructure network. Improvements to its quality and accessibility are therefore encouraged and the Council has undertaken a Green Belt review as part of the planmaking process. Green Belt and MOL in the Borough is diverse in nature and includes brownfield land which has previously been in industrial use, primarily in areas such as Lea Bridge and on the fringe of the North Circular to the west of the borough. Accordingly, if exceptional circumstances exist in these areas and are confirmed by the Council's Green Belt Review, para 136 of the NPPF sets out the circumstances in which the boundaries of these parcels may be adjusted or the land developed.

17.7 The projected growth in population and housing demand increases the importance of improving the provision of accessible open spaces, especially in areas of deficiency. Accordingly all developments that create one or more units will need to submit an ecology report which will use the Mayor's Urban Greening Factor (UGF) to demonstrate that the development meets or exceeds the Mayor of London's minimum UGF score of three. Full justification will be required where open space or landscape infrastructure cannot be provided on-site. In these circumstances, the Council may require financial contributions in order to enhance or upgrade the provision of local open space(s) in the vicinity of the development in accordance with the Council's Planning Obligations SPD. Effective maintenance is essential where open spaces and landscape infrastructure is provided to ensure the long term benefits of such provision. Where new open space is provided on-site as part of new developments, their design and integration and ongoing maintenance should be carefully considered at an early stage to ensure maximum benefits and unnecessary delays to provision are avoided.

17.8 It is vital to protect and strengthen the network of Green Corridors in the Borough and to support measures to improve the links to Green Corridors in neighbouring Boroughs and Districts. This can be done through landscaping and the careful siting and design of buildings. Green corridors and a network of green islands deliver benefits in supporting biodiversity and mitigating against the impacts of climate change and pollution. Richness and diversity in bird and bat populations in urban areas is strongly affected by tree numbers and distribution. Establishing corridors and links with suitable native trees would improve the environment for local people significantly and help to "buffer" and support Epping Forest's biodiversity and adding to the natural capital assets of London.

17 Protecting and Enhancing the Environment

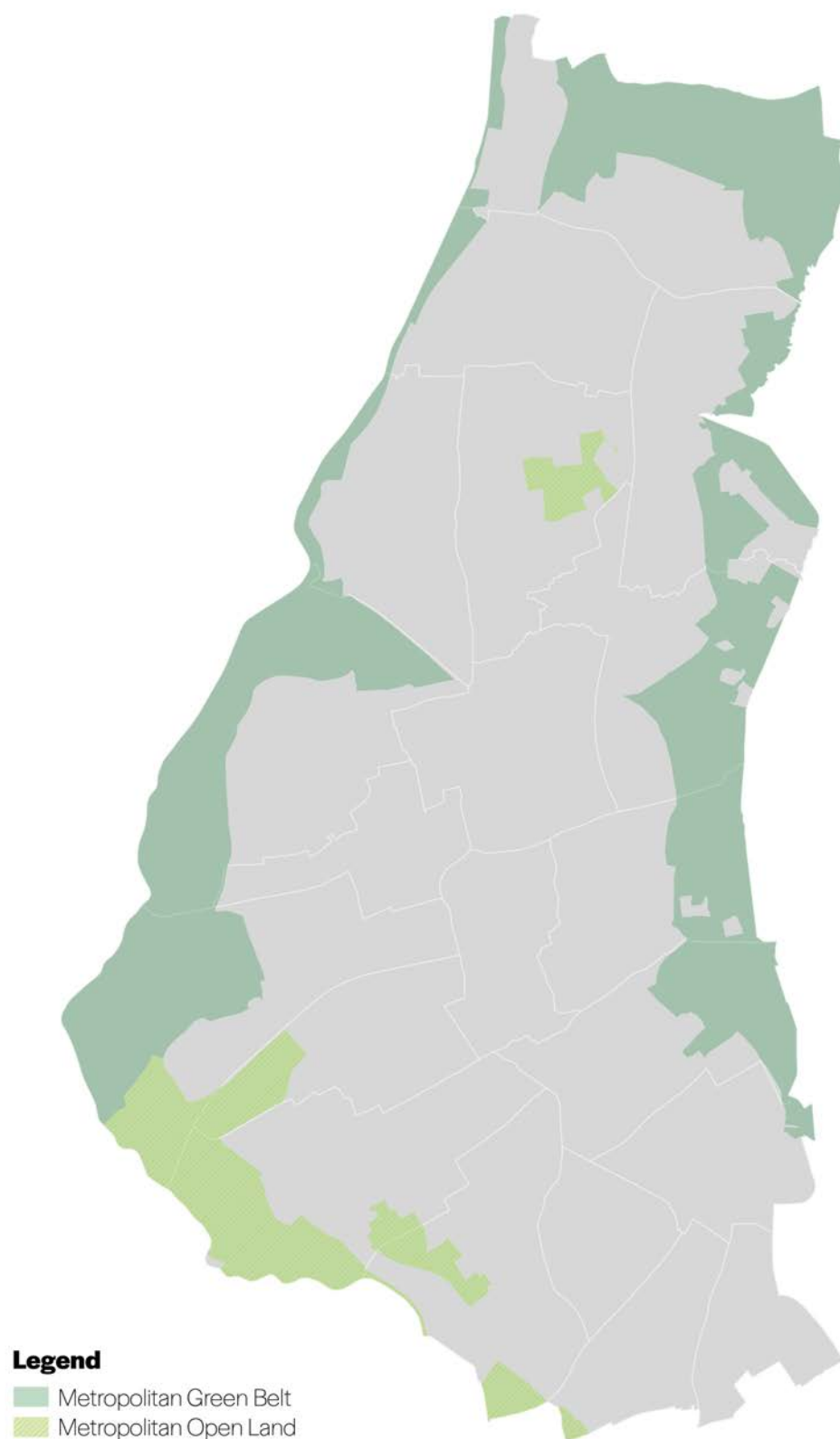


Figure 17.1

Policy 85**Open Spaces Sport and Recreation**

Existing Open Spaces will be preserved and enhanced and access for sport and recreation across the borough improved by:

- A. Ensuring adequate provision, protection, enhancement and quality of play and recreational spaces, outdoor sports facilities and parks for all sections and age groups of the community
- B. Preserving the existing level of provision of playing pitches in line with any future review in accordance with the Playing Pitch Strategy
- C. Ensuring that all parks within the Borough will be enhanced and retained in accordance with the Councils ' Parks and Open Spaces Strategy. Development proposals will only be acceptable where they are ancillary to the open space use and its inherent character. In addition and where relevant, proposals must demonstrate that there are no adverse impacts to the setting or visual appearance of the historic parks and gardens.
- D. Expecting residential and mixed use proposals to contribute to the provision of high quality and accessible exercise, play and recreational facilities either on or off site, based on child yields in accordance with the Mayor of London's current standards.
- E. Expecting proposals for new development to provide or to enhance the quality of outdoor sports facilities, playing pitches and/or their associated ancillary facilities and access, taking account of priorities set out in the Council's Playing Pitch Strategy.
- F. Requiring the submission of management and maintenance plans as a requirement of planning permission for all new sports and recreation facilities provided.
- G. Encouraging opportunities to provide ancillary facilities to enhance the attractiveness and experience of using open spaces such as cafes, toilets and baby changing facilities.

17.9 To promote healthy communities, open space provision must be high quality and usable in order to provide space for leisure and relaxation. This is really important in areas where there are identified deficiencies in access to open spaces. Research has shown that parks are valuable for social interaction and people with access to quality open space are often physically and psychologically healthier. In addition to the inherent benefits of open space, development can contribute to the provision of a variety of sports, leisure and physical activity facilities for residents to address health and wellbeing priorities and deficiencies in the borough.

17.10 Open spaces are also important in addressing climate change and contributing to air quality improvements in heavily urbanised areas, and the numerous benefits that open spaces provide to communities must be protected from increased

urbanisation. Waltham Forest is a green borough which includes parks and gardens of Local Historic Interest. Proposals within such spaces will be expected to be ancillary to the open space use, respect its setting and visual appearance through sensitive design.



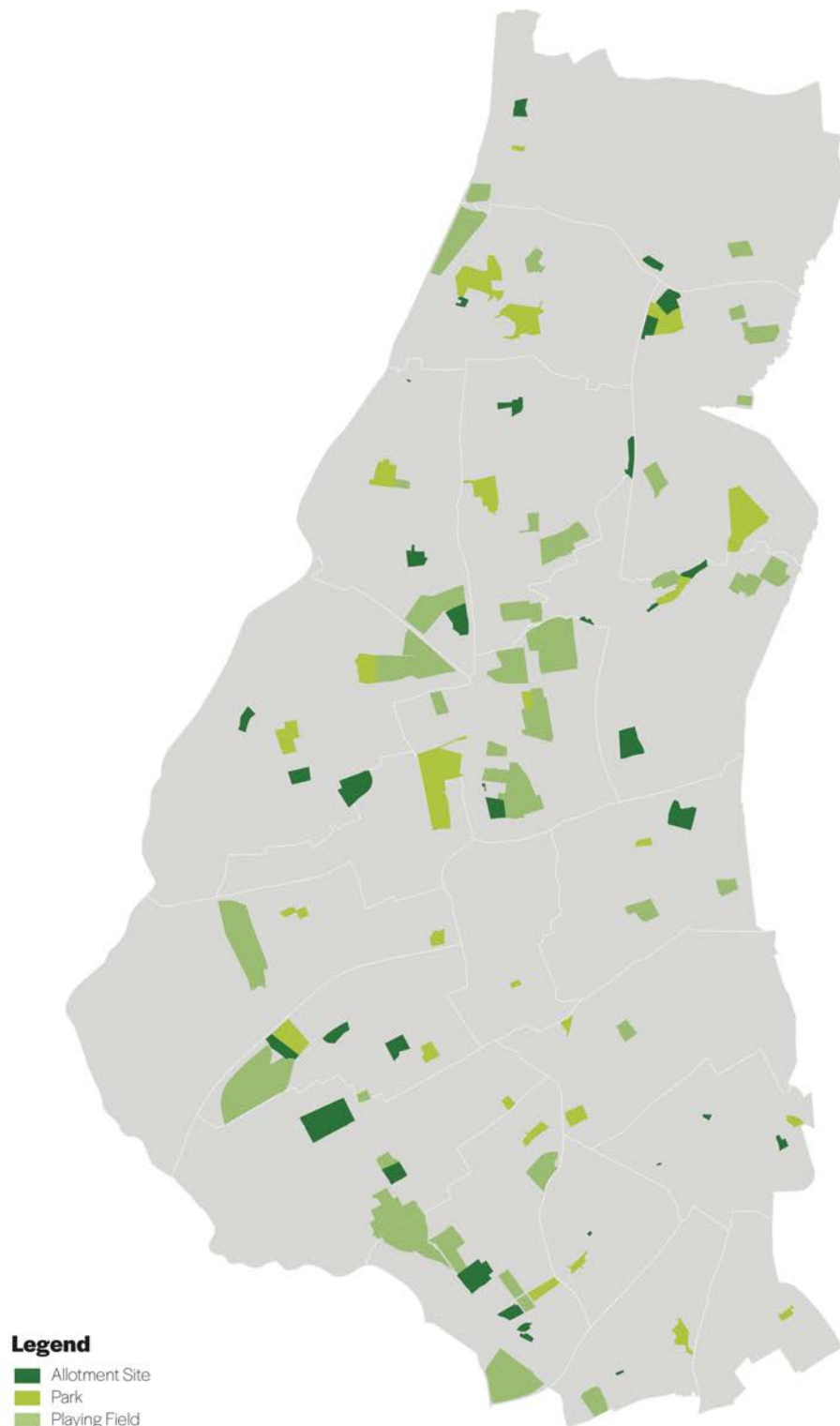


Figure 17.2

Policy 86**Biodiversity and Geodiversity**

Proposals affecting biodiversity and geodiversity resources in the Borough will ensure that:

- A. All development should maximise opportunities to create new or make improvements to existing natural environments, nature conservation areas, habitats or biodiversity features and link into the wider green infrastructure network
- B. All major development proposals are required to include a biodiversity survey of the site
- 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 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
- D. Where opportunities arise, development proposals must provide measures to support species and habitats through the use of landscaping on or adjacent to buildings. This may involve the inclusion of living roofs and walls or other measures which provide space for species to nest, roost or hibernate.)
- E. Where vacant or derelict land is awaiting redevelopment and has some value for nature conservation, the Council will expect it to be protected on a temporary basis.
- F. Development proposals will be expected to improve sensitive public access to areas of nature conservation, especially in areas of deficiency.
- G. An arboricultural report must be submitted at the planning application stage where a development proposal will impact on trees. Damage to trees or their loss should be avoided where possible; and where this cannot be achieved, mitigation and compensation measures should be outlined and implemented.
- H. 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). 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.

- 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.
- J. Development proposals which would affect a designated site with geodiversity value should seek to retain, restore and enhance the geological interest where possible.

17.11 Waltham Forest has many spaces of biodiversity significance. These require a high level of protection, enhancement and management, and the Council works closely with bodies such as Natural England and the Conservators of Epping Forest in this regard. Because of their overall importance, potential impacts from development proposals have to be rigorously assessed. Ecological assessments must be developed from the earliest stages of the pre-application process and should demonstrate as a minimum how the resource will be retained, enhanced and if necessary restored. This is particularly relevant in order to establish and improve links between areas of nature conservation importance, for instance, between Epping Forest and other wooded areas (e.g. Larks Wood) in the Borough. Accordingly development is expected to provide biodiversity benefits in accordance with the principle of net gain set out in the Draft London Plan.



17.12 Protected species and priority species of plants and animals are defined in the Waltham Forest, London and UK Biodiversity Action Plans (BAPS). Sites of importance for their biodiversity value are mainly in Epping Forest and the Lea Valley and these important biodiversity and green infrastructure assets are the foundation for future enhancements to the borough's green infrastructure.

17.13 The highest level of protection is accorded to Ramsar sites, Special Protection Areas (SPA), Special Areas for Conservation (SAC) and Sites of Special Scientific Interest (SSSIs) in the borough. There is a statutory requirement to consult Natural England in cases where development may affect these sites. Sites of Metropolitan, Borough or Local Importance for Nature Conservation and Green Corridors are also priorities for protection, enhancement and management.

17.14 Where planning permission is granted, planning conditions will ensure that appropriate measures are taken to protect and enhance biodiversity where it may be impacted by development. Measures to recover or relocate habitats should only be a last resort with a preference for the protection, enhancement of existing habitats wherever possible.

17.15 Where damage is likely to occur to protected species, conditions may relate to reducing disturbance in line with legislation and improving habitats. It is however acknowledged that certain essential maintenance works are necessary. For example,

many areas alongside railway lines in the borough are recognised for nature conservation value but need to be accessed for maintenance works by the transport provider. In such cases, the Council will expect the requirements for mitigation and compensation to be met in accordance with this policy.

17.16 The Draft London Plan recognises 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. This is especially important in order to protect species or mitigate against any unavoidable loss, such as at brownfield sites. As well as providing a valuable habitat, landscaping serves to reduce the urban heat island effect created by climate change. In accordance with the Climate Change Strategy, climate change tolerant species and/or native species are preferable in landscaping schemes.

17.17 The loss of, or damage to trees should be avoided where possible in the interest of amenity, habitat and privacy. Existing trees are important for their biodiversity value and contribution to the character of an area, particularly veteran trees and ancient woodland. Ancient woodland is recognised and protected as Sites of Importance to Nature Conservation. Tree preservation is important where appropriate through Tree Preservation Orders (TPOs) and in the specific provisions for trees in Conservation Areas. In appropriate locations, proposals will be required to provide details of the planting of suitable tree species in accordance with the Waltham Forest Tree Strategy. Financial contributions can be used for tree-planting on or off site depending on the scale and nature of the development.

17.18 Geodiversity is concerned with both the natural and human aspects of landscape, but is primarily focused on the rocks, sediments, soils, the landscape topography and the processes that act on the landscape. It is a fundamental natural resource. All raw materials that cannot be grown and all energy that cannot be generated by renewables have to be won from the Earth's crust.

17.19 Geodiversity is also a key factor in the borough's cultural identity. The geodiversity of any area is an equally important part of its natural heritage as its biodiversity. Conservation, sustainable management, educational use and interpretation of geodiversity are thus as important as that of biodiversity or archaeology.

17.20 National policy requires sites with geological conservation interests to be protected. The draft London Plan stipulates that development proposals should give locally important geological sites the level of protection commensurate with their importance. The protection provided in this Plan includes a presumption against hydraulic fracturing, otherwise known as fracking on the basis that the British Geological Survey concluded in a 2014 report for the Department of Energy and Climate Change that "there is no significant Jurassic shale gas potential in the Weald Basin". From this the draft London Plan concludes that it is highly unlikely that there is any site that is geologically suitable for a fracking development in London.



Figure 17.3

Policy 87**The Lee Valley Regional Park and Epping Forest**

Proposals which affect the Lee Valley Regional Park and/or Epping Forest will ensure that:

- A. Development proposals include measures for the protection, enhancement and where possible, the extension of the borough's network of Green Corridors.
- B. Development proposals affecting the Lee Valley Regional Park or 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. Development proposals in proximity to the Lee Valley Regional Park should improve access and links to the park and its waterways.
- D. Development proposals in proximity to the Epping Forest Special Area of Conservation (SAC) should improve access and biodiversity enhancements in line with any requirement of Natural England and the Epping Forest Conservators

17.21 The Lee Valley Regional Park and Epping Forest are major assets for Waltham Forest providing valuable benefits to local communities in terms of access to nature and to healthy outdoor recreation. The Council supports Epping Forest's long term management objectives and Lee Valley Regional Park Authority's Park Development Framework. The Council will work cooperatively with the Lee Valley Regional Park Authority and the Epping Forest Conservators.



17.22 The Epping Forest Special Area of Conservation (EFSAC) covers a large area of land within the Borough and much of the Forest is designated as a Special Area of Conservation (SAC). These SAC are strictly protected sites designated under the EC Habitats Directive (transposed into UK law via through the Conservation of Habitats and Species Regulations 2010). The Epping Forest SAC is considered a 'European Site' and as such an assessment, known as a Habitats Regulation Assessment (HRA), is required for any development plan or proposal. Accordingly development which results in the creation of new (rather than replacement) dwellings will be expected to contribute to the mitigation of recreational impacts through financial contributions

as set out in the Planning Obligations Supplementary Planning Document.

17.23 The Lee Valley Regional Park Authority (LVRPA) is a statutory authority created by the Lee Valley Regional Park Act 1966 (The Park Act). It has a statutory responsibility to either provide directly or work with partners to provide facilities for

sport, recreation, leisure, entertainment and nature conservation throughout the Park. Section 14 (1) of the Park Act requires the Authority to prepare a plan setting out proposals for the future management and development of the Regional Park and riparian authorities such as Waltham Forest are required to include those parts of the plan affecting their area within their own relevant planning strategies and policies (Section 14(2) (a)) although inclusion does not infer that the planning authority necessarily agrees with them (Section 14(2) (b)). Both the Park Plan 2000 and the Park Development Framework are relevant in terms of Section 14 (2) of the Park Act and are formal statements of the Authority's position in respect of development within the Regional Park.

17.24 Further, sections 14 (subsections 4-7) of the Park Act requires local planning authorities to consult with the LVRPA on applications for planning permission which they consider could affect the Park. Section 14 (subsections 8-9) allows the LVRPA to refer the decisions of the riparian authorities to the Secretary of State if it is considered by the LVRPA that the decision taken materially conflicts with the proposals of the Authority for the development of the Park.

17 Protecting and Enhancing the Environment

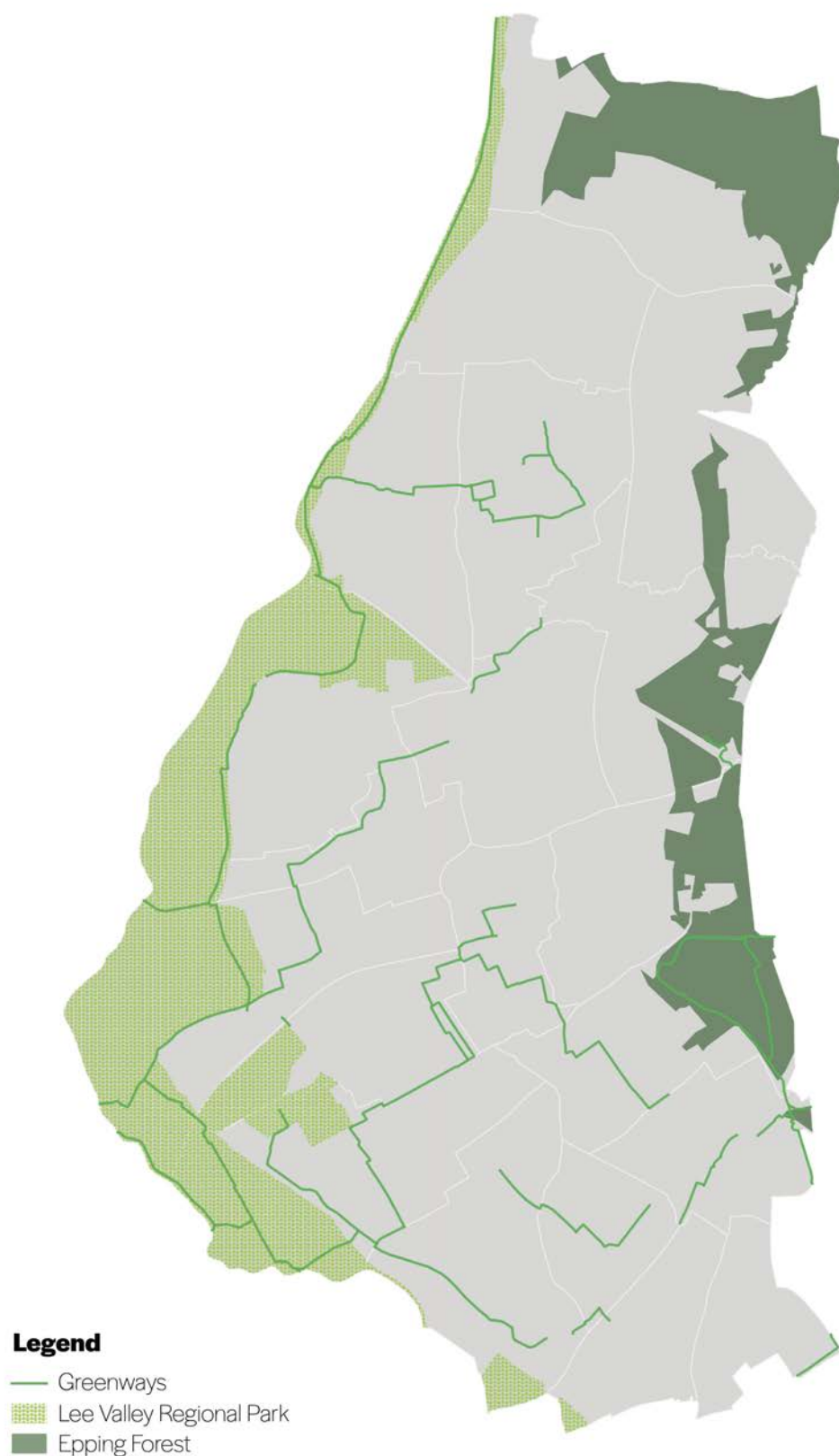


Figure 17.4

Policy 88**Waterways**

Proposals affecting waterways should demonstrate that:

- A. there will be no adverse impacts on the water environment, species or habitats and that enhancement measures have been incorporated wherever possible;
- B. Flood Defence Consent is obtained from the Environment Agency for works in, under, over and adjacent to watercourses;
- C. the use by freight transport is not inhibited and where possible increased; buffer zones of at least 8m for main rivers and 5m for ordinary water courses are established and left free of any permanent structures. Where it is not possible to do so, strong justification should be provided. Where provided, buffer zones should be carefully integrated with new developments so they do not create dead spaces.

17.25 Waterways in Waltham Forest support a range of ecological resources, many of which are covered under European and national legislation. Enhancement measures such as naturalisation and deculverting are valuable for the management of nature conservation and flood risk of waterways. 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.

17.26 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 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 its navigation Canal(s).

17.27 Waterways also provide a unique setting for buildings and the uses which occupy them. Design solutions that derive inspiration from the water environment and complement the physical context in relation to visual appearance and scale and ecological integrity, will help ensure new developments do not have an adverse impact on the water environment.

17.28 Rivers have been degraded in certain locations by previous development, such as at Dagenham Brook. There may be future redevelopment opportunities adjacent to waterways that do not compromise wildlife, flood relief or amenity use and these will be encouraged where they act as a catalyst for attractive regeneration

or deliver enhancement works. Waterways are also valuable for freight transport, providing key routes through London. It is therefore important that such use is not inhibited and increased. The Council is keen to increase public access to waterways for recreation but this should be balanced with the need to prevent undue disturbance on sensitive species and habitats. This is particularly relevant in the case of the Walthamstow Wetlands where the aspiration has been to establish better access to nature, enhance heritage assets and foster connectivity with other open spaces including the Olympic Park.



Policy 89

Food Growing and Allotments

Existing allotments are accorded the highest level of protection in this plan.

- A. There should be no net loss of allotment sites and the intensification of land currently used to grow food will be acceptable where management arrangements allow.
- B. Development proposals will be expected to contribute to the supply, quality and accessibility of private and communal spaces on which to grow food and flowers. This may be in the form of financial or on-site contributions. On-site contributions must be supported by a maintenance plan at application stage.

17.29 There are 27 Council-managed allotment sites, seven non- Council managed leased sites and four privately owned allotment sites in Waltham Forest. Demand for allotments is high and the Council seeks to protect all existing sites and where possible support the provision of new allotments. The Council welcomes the expansion and improvement of existing allotments and community food growing schemes.

17.30 Spaces such as allotments provide positive physical and mental health benefits to residents through healthy lifestyle adjustments such as the opportunity to produce and consume fresh healthy food, spend time in the open air and meet with others.



17.31 The Council will encourage food growing and community gardening initiatives on existing open spaces and temporarily derelict land where short or medium term development is not planned.

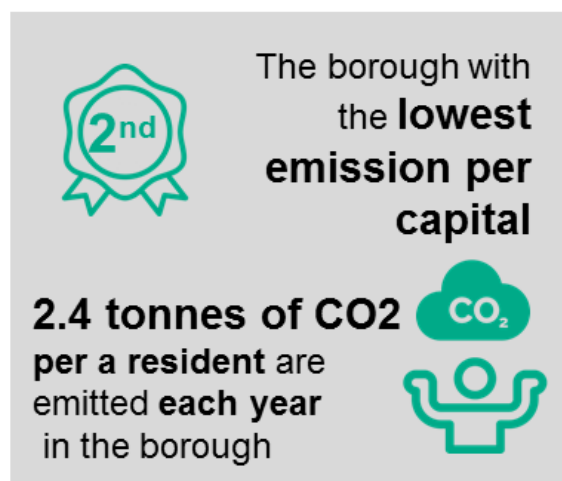
17.32 In all cases consideration must be given to the installation and maintenance of facilities for equipment storage and arrangement for composting. There must be no detrimental impact on the character, appearance and amenity of the surrounding area, and to equality of access and security.

18 Ensuring Climate Change Resilience

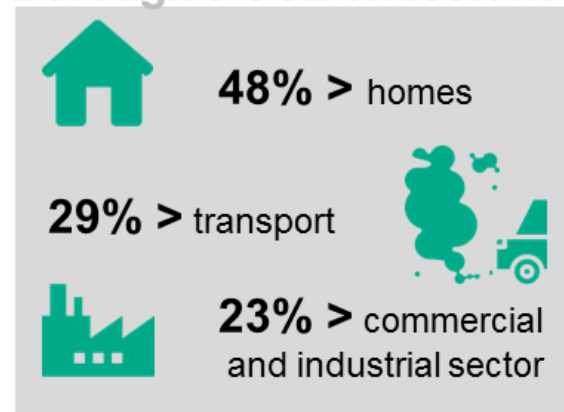
Strategic Objectives:

Waltham Forest builds its resilience through addressing sustainability, efficient waste management and the effects of climate change through all stages in the development process.

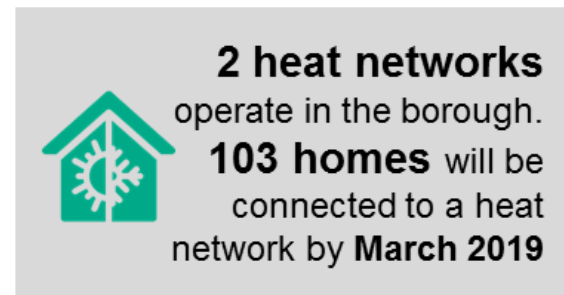
18.1 Strategically addressing climate change is an important challenge facing the borough in delivering sustainable development. With significant pressure for growth, we must ensure that new development adds to the borough's resilience in mitigating and adapting to any adverse climate change impacts. Careful management must be taken to minimise any further impact on the natural environment now that the borough has formally declared a climate emergency.



Borough's CO₂ emissions



Achievements



Policy 90**A Zero Carbon Borough**

Waltham Forest will minimise greenhouse gas emissions, reduce the borough's carbon footprint and maximise energy efficiency within developments by:

- A. Promoting low carbon energy generation and maximising the opportunity for renewable energy following the London Plan energy hierarchy;
- B. Ensuring all major development proposals prepare an energy assessment, and strongly encouraging all minor non-residential developments to prepare one;
- C. Ensuring all new major residential and non-residential development meets the zero carbon emissions target in line with the London Plan energy hierarchy;
- D. Ensuring residential development achieves a 10% reduction and non-residential development a 15% reduction below Part L of the Building Regulations (or updated Building Regulations) through energy efficiency measures alone;
- E. Ensuring energy masterplans are prepared for large scale development locations in accordance with the criteria set out in London Plan Policy SI3(B), which states that they should identify:
 - i. Major heat loads (including anchor heat loads, with particular reference to sites such as universities, hospitals and social housing);
 - ii. Heat loads from existing buildings that can be connected to future phases of a heat network;
 - iii. Major heat supply plants;
 - iv. Possible opportunities to utilise heat from waste;
 - v. Secondary heat sources;
 - vi. Opportunities for low temperature heat networks;
 - vii. Possible heating and cooling network routes;
 - viii. Opportunities for futureproofing utility infrastructure networks to minimise the impact from road networks;
 - ix. Infrastructure and land requirements for electricity and gas supplies;
 - x. Implementation options for delivering feasible projects, considering issues of procurement, funding and risk, and the role of the public sector;
- F. Requiring Carbon Offset Fund (COF) contributions for all major developments where it is demonstrated that carbon emissions targets cannot be met through on-site measures.

18.2 To align with London Plan targets, the transition towards zero carbon set out in our forthcoming Climate Change Strategy will be strongly supported. Clear carbon reduction targets must be set to support this ambition and attention focused on delivering energy efficient development in accordance with the Mayor's energy hierarchy. This energy hierarchy aims to minimise energy demand and address energy supply and renewable energy provision. This will be the context for the use of smart technologies and low-carbon and renewable energy sources.

18.3 The preparation of energy assessments at the application stage will be required to demonstrate how climate change mitigation measures in major developments meet the requirements of the London Plan's energy policies and energy hierarchy. Here, major development proposals should follow the methods set out in the Standard Assessment Procedure (SAP) for major residential developments and the National Calculation Methods for major non-residential developments.

18.4 We will prepare energy masterplans for large scale development locations. Where these are available, developers will be expected to take account of and to build upon these in their energy strategies, which should provide analysis of energy supply and demand as well as the potential to use low or lower carbon communal and district heating networks. The expansion of district heating networks in priority areas will here be encouraged in line with the London Plan.

18.5 Carbon Offset Fund contributions will be expected from all major developments where carbon targets cannot be met on-site. This will fund carbon reduction projects within the borough and will help to offset the carbon impact of development.

Policy 91

Decentralised and Renewable Energy

New development will maximise its use of decentralised energy systems by:

- A. Ensuring developments of one or more units, or greater than 100m² that are located within the proximity of an existing or committed future decentralised energy network install a communal heating system, assess opportunities to connect to the local decentralised energy network, future proof and are made "connection ready" unless it can be demonstrated to the Local Planning Authority's satisfaction that such a connection is not feasible, in line with the following thresholds:
 - i. Development of one or more units or greater than 100m² located within 200m of an existing or committed future decentralised energy network;
 - ii. Major development located within 500m of an existing or committed future decentralised energy network;
 - iii. Development of more than 50 units located within 100m of an existing or committed future decentralised energy network.



18.6 The existing 2016 London Plan has set a target to generate 25% of its heat and power through local decentralised energy systems by 2025. The adoption of decentralised energy systems increases heating efficiency and will help Waltham Forest to become more self-sufficient in its energy use, whilst also decreasing carbon emissions. Developments will therefore be expected to install communal heating systems and connect to

decentralised energy networks where appropriate to provide a more sustainable source of heating and hot water in line with the London Plan.

Policy 92

Sustainable Design and Construction

The sustainable delivery of development will be achieved by:

- A. Ensuring that the design, construction and operation of new development is informed by the latest London Plan and that development proposals clearly demonstrate how sustainable design standards are integrated into the proposal;
- B. Ensuring that non-residential development greater than 100m² achieves BREEAM 'very good' or equivalent standards, and encouraging major non-residential development to achieve 'excellent' or equivalent;
- C. Ensuring that residential development targets higher standards of sustainability including the Home Quality Mark and Passivhaus;
- D. Ensuring that development of 1 or more units or greater than 100m² is designed with sustainable development principles to achieve stepped zero-carbon targets in line with the London Plan;
- E. Adopting sustainable construction and demolition methods including using sustainably sourced, re-used and recycled materials and where feasible demolished material from the development site;
- F. Controlling and monitoring dust and PM10 and PM2.5 emissions from development;
- G. Requiring all built development to achieve at least a 35% on-site carbon reduction below Part L of the Building Regulations 2013 (or the latest version of the London Plan or building regulations), targeting zero carbon where possible and offsetting the remainder;
- H. Maximising urban greening, blue and green infrastructure measures and incorporating 'living building' principles into new and existing developments;
- I. Minimising waste during the construction and operation phases of development;
- J. Providing a clear strategy for adequate waste and recycling storage and collection facilities;
- K. Supporting the low-carbon retrofitting of existing buildings to reduce carbon emissions.

By aiming to exceed national standards (such as Building Regulations) and encouraging development that enhances the natural environment, this policy will further support low-carbon, sustainable development. Accordingly, all non-residential developments will be also expected to achieve BREEAM (Building Research Establishment Environmental Assessment Method) targets (a minimum of BREEAM 'very good'). The adoption of sustainable design principles, use of sustainable construction methods and building materials in addition to measures to increase resource efficiency will be supported. This will help to reduce greenhouse gas emissions, aid prevention of adverse environmental impacts, and help to ensure resilience to the impacts of climate change. Guidance as set out in the Mayor of London's 'The Control of Dust and Emissions During Construction and Demolition' Supplementary Planning Guidance (SPG) will also be followed.

Policy 93

Air Pollution

New development should mitigate any adverse air pollution impacts by:

- A. Ensuring development meets, and where possible improves upon, air quality neutral standards over its lifetime and does not contribute to a decrease in air quality during the construction or operation stage;
- B. Undertaking Air Quality Assessments (AQA's) for the following types of development:
 - i. All major developments, unless there is clear evidence that transport and building emissions will be less than the existing use;
 - ii. Development in areas of sub-standard air quality and changes of use which result in an introduction of sensitive receptors to areas of poor air quality;
 - iii. Development in close proximity to sensitive uses;
 - iv. Developments which involve significant demolition and construction;
- C. Ensuring development is air quality positive in air quality focus areas;
- D. Assessing existing air quality and avoiding locating sensitive uses in areas exposed to air pollution;
- E. Minimising exposure to air pollution through the considered positioning and design of new development, considering private, communal, public open space and child play spaces;
- F. Incorporating on-site measures to improve air quality, however where it can be demonstrated that on-site provision is impractical or inappropriate, off-site measures to improve local air quality may be acceptable, providing equivalent air quality benefits can be demonstrated.

18.7 Air pollution has significant impacts on climate and human health. It is essential that exposure to atmospheric pollutants is minimised across the borough. Due to its high air pollution levels, Waltham Forest published an Air Quality Action Plan (2018)

establishing plans to improve local air quality; a priority within the borough. Existing concentrations of nitrogen dioxide and particulates (PM10) are of considerable concern and pose a significant threat to human health; where they are most heavily concentrated along major roads and in areas of high motor vehicle activity.

18.8 Development that aims to improve upon air quality neutral standards will be strongly supported and larger scale developments in particular will be expected to be air quality positive in line with the London Plan. Innovative design solutions, urban greening and other mitigation strategies will also be encouraged to improve air quality in all developments. In accordance with the London Plan, air quality assessments will be required for major developments, developments associated with sensitive uses/receptors and where considerable demolition will occur.

18.9 Air quality assessments will also be required where there will be a significant increase in vehicular traffic and the use of more polluting technologies including the use of non-road mobile machinery (NRMM) in construction. This will help to identify any major sources of pollution, constraints placed on sites by poor air quality, suitable land uses for sites, and design strategies that could improve air quality. Direct exposure to air pollution will be minimised through intelligent design of new development, and the plan will support on/off-site measures where they clearly demonstrate the delivery of air quality improvements in line with the London Plan.

Policy 94

Water

New development should prevent any adverse impacts on water quality and water supply by:

- A. Ensuring new development that is seen to have the potential to cause adverse effects on water quality provides appropriate mitigation to alleviate risk;
- B. Ensuring developments include water efficiency measures including rainwater harvesting, greywater recycling and smart-metering;
- C. Ensuring residential schemes achieve a water efficiency target of 105 litres per person/day or less, and non-residential developments including refurbishments target maximum water credits in BREEAM or equivalent;
- D. Ensuring that development proposals appropriately manage foul water and surface water connections and provide adequate wastewater infrastructure capacity;
- E. Protecting existing water and sewerage infrastructure and managing pressure on combined sewer networks.

18.10 Maintaining a high level of water supply and quality are critical within the borough, as are measures to improve water use efficiency. Climate change increases the likelihood of serious and prolonged droughts, owing to increasing temperatures and climatic variability. New development can lead to decreased water quality through pollution and put stress on the existing water supply and waste water infrastructure.

With water demand soon forecasted to exceed water supply, the borough needs to adapt to increasing water scarcity, especially during summer months and it must ensure the prevention of water pollution through new development. This policy aims to address both issues, and will support development that devises appropriate mitigation measures to protect water quality in line with the Thames River Basin Management Plan and Catchment Flood Management Plans.

18.11 In line with the London Plan, water efficiency measures will be supported to help maximise water supply and we will strongly encourage developers to meet water consumption targets of 105 litres or less per day per person in residential developments. Water saving and reuse fittings and appliances, alternative water sources and low water-consuming landscaping can all help to maximise water efficiency. Developers should follow best practice guidance as set out in the Mayor of London's 'Sustainable Design and Construction' SPG. In addition, non-residential development and refurbishments will be required to achieve maximum BREEAM water credits to help conserve water.

18.12 The mismanagement of sewer systems leads to significant contamination from foul water in the borough's open surface water. Careful management of this infrastructure is therefore critical and we will ensure that new development proposals incorporate designs that prevent cross-contamination between foul and surface water as required in the London Plan. The sufficient provision of wastewater infrastructure capacity will also be essential in order to appropriately manage foul and wastewater, in addition to minimising the pressure placed on combined sewer networks. This will further reduce the risk of contamination and water pollution, which will lead to a more sustainable water supply and improved health.



Policy 95**Contaminated Land**

We will manage contaminated land and prevent the spread of contamination by:

- A. Ensuring that site investigation and desk-based research is undertaken in line with current guidance for new developments proposed on contaminated or potentially contaminated land, and remediation proposals are agreed to deal with any identified contamination;
- B. Ensuring new development addresses the impacts of contaminated land on on/off-site sensitive receptors through proportionate action(s) during the construction phase and during the operation phase where appropriate, over the entire lifetime of the development;
- C. Requiring development that has the potential to contaminate land, or which is situated in close proximity to sensitive receptors to include mitigation measures to prevent any adverse impacts on people and the environment, and to monitor any impacts where appropriate.

18.13 Land that is seen to be affected by contamination will require thorough site visits and desk-based research, in addition to appropriate remediation strategies where new development is expected. In addition, this Local Plan will support developments which have proposed mitigation measures to reduce the impact of land contamination on people and the environment, whilst the impact of development on sensitive receptors will be also carefully managed.

Policy 96**Managing Flood Risk**

Flood risk will be managed by:

- A. Directing potentially vulnerable development away from high-risk flood areas unless there is clear evidence that specific flood-risk mitigation strategies can be implemented;
- B. Ensuring essential infrastructure and less vulnerable uses within flood zone 3a pass the exception test;
- C. Ensuring all development in flood zones 2 and 3 meet the sequential test;
- D. Requiring flood risk assessments to be undertaken where:
 - i. The development is situated in flood zone 2 or 3 including all minor development and change of use;
 - ii. The development is greater than 1 hectare (ha) in flood zone 1;
 - iii. The development is less than 1 hectare (ha) in flood zone 1, where this includes a change of use to a more vulnerable class and where the development may be affected by sources of flooding other than fluvial and surface water flooding;
 - iv. The development is situated in an area within flood zone 1 which has critical drainage issues;
- E. Requiring appropriate on and off-site flood mitigation strategies to decrease vulnerability;
- F. Requiring all developments to provide a detailed on-site surface water management and sustainable drainage strategy; and all developments including minor refurbishments and changes of use to integrate Sustainable Drainage Systems (SuDS), especially those situated within critical drainage areas;
- G. Ensuring that the creation or extension of basements would not increase the potential for groundwater flooding in the property itself or in surrounding areas and ensuring they include flood resilient and resistant techniques to reduce the impact of flooding;
- H. Ensuring all developments achieve greenfield runoff rates for off-site discharge rates through the use of SuDS following the drainage hierarchy in the new London Plan;
- I. Maximising the capacity of existing water storage areas and surface water facilities.

18.14 Climate change is increasing the need to plan for heavy rainfall events and flooding. With a significant proportion of the borough lying within flood zones 2 and 3, flooding will be an increasingly prominent threat in the borough. The relocation of vulnerable development away from high flood-risk areas will be supported in line with the National Planning Policy Framework using the Environment Agency's catchment flood management plans and Waltham Forest's local flood risk

management strategies. Flood risk assessments will also be undertaken where appropriate in accordance with the National Planning Policy Guidance and relevant planning practice guidance.

18 Ensuring Climate Change Resilience

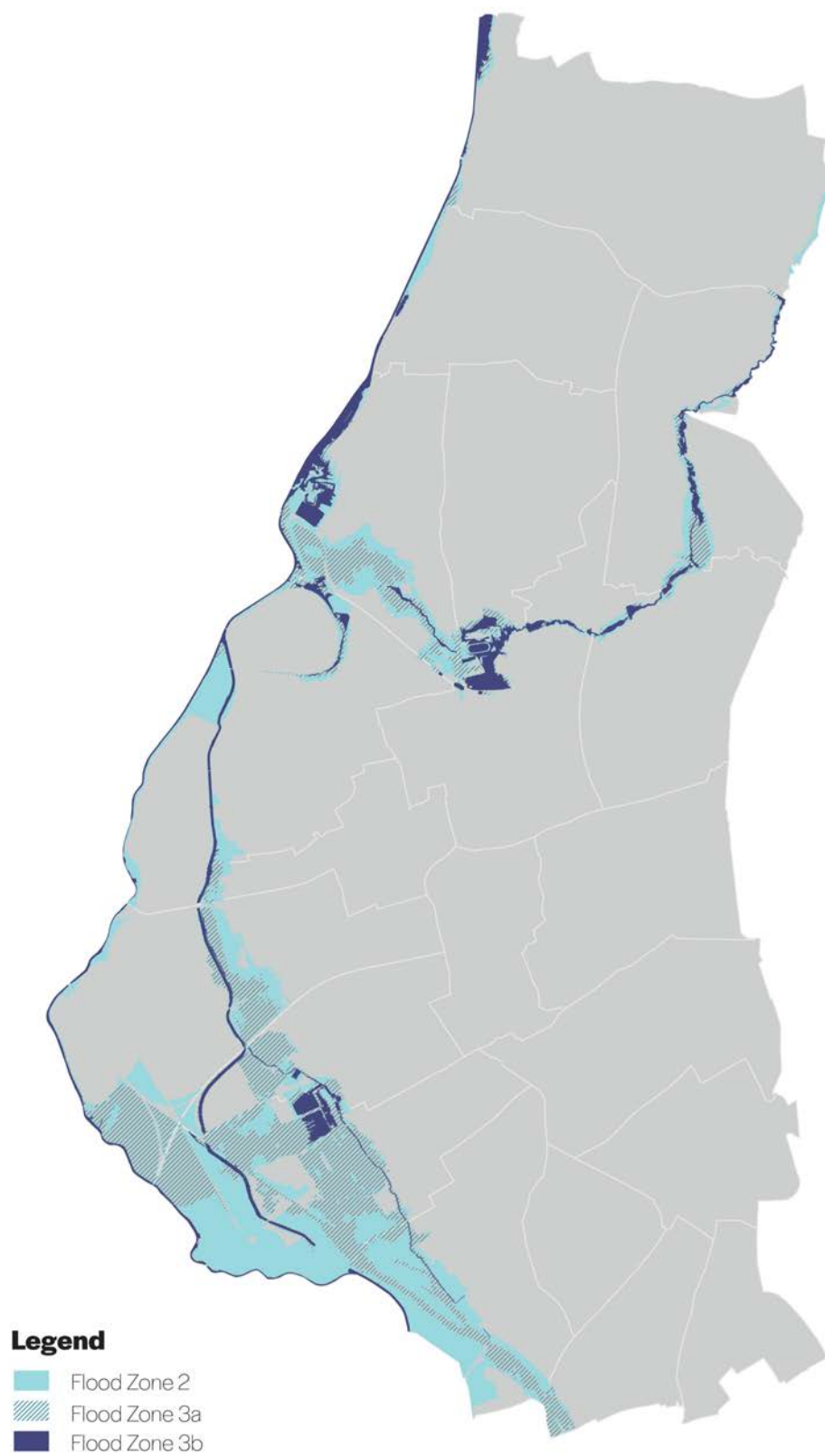


Figure 18.1

18.15 The use of sustainable urban drainage systems, urban greening, landscaping and other mitigation strategies within this green and blue infrastructure approach will also be strongly encouraged in new and existing development to minimise the impacts of flooding from multiple sources (including surface water, groundwater and watercourses). Development will also be expected to follow the drainage hierarchy to ensure off-site discharge rates meet greenfield runoff rates, utilising SuDS in particular. Maximising water storage capacity will help to alleviate the intensity of flood events by providing a greater volume for rainfall attenuation; a key strategy to increase long-term resiliency across the borough.

18 Ensuring Climate Change Resilience

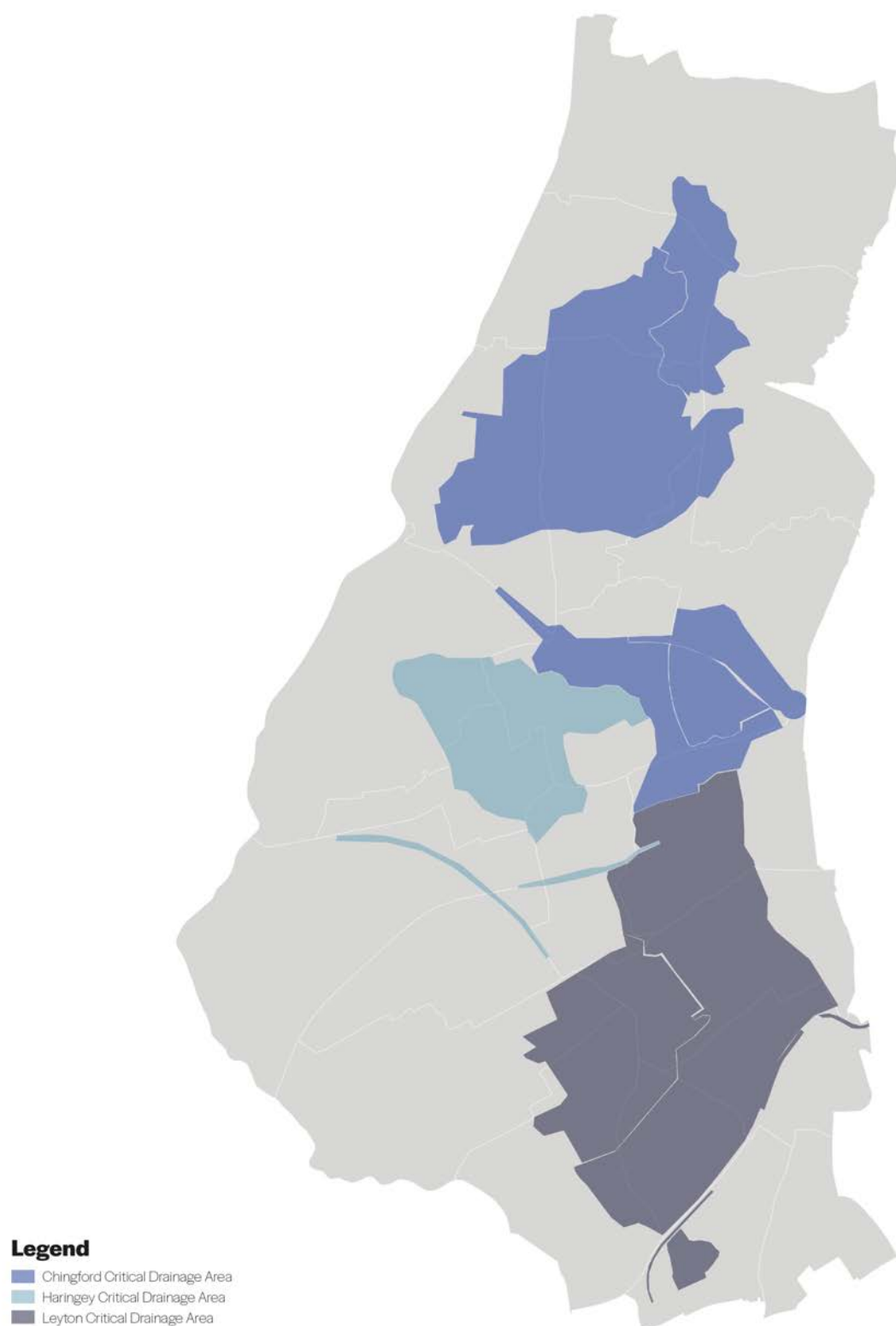


Figure 18.2

Policy 97**Overheating**

To avoid exacerbation of the Urban Heat Island effect (UHI), improve micro-climate conditions, and provide thermally comfortable environments, overheating will be prevented by:

- A. Optimising the layout, orientation, materials, technology and design of new development to minimise any adverse impacts on internal and external temperature, reflection, overshadowing, micro-climate and wind movement;
- B. Ensuring major development proposals follow the cooling hierarchy in alignment with London Plan considering future climate change;
- C. Implementing adequate mitigation measures to minimise overheating including landscaping, tree planting and the use of blue-green infrastructure;
- D. Ensuring all major developments undertake overheating assessments in line with CIBSE TM59 or equivalent.

18.16 Climate change will increase the severity and frequency of extreme heat events in the borough over the coming years. Where the Urban Heat Island will exacerbate these increased temperatures, Waltham Forest must seek to mitigate and adapt to increase its resiliency. This policy aims to address the issue of overheating, and this plan will support development that utilises sustainable design and construction principles to help reduce internal and external temperatures and improve human comfort.

18.17 To analyse their risk of overheating, new developments will be required to undertake overheating assessments in line with CIBSE guidance as set out in the GLA's 'guidance on preparing energy assessment as part of planning applications'. Development proposals should also adopt the London Plan's cooling hierarchy to mitigate overheating and avoid reliance on air conditioning systems. This cooling hierarchy includes measures such as passive ventilation, active low-carbon cooling systems, mechanical ventilation, energy efficient design, high ceilings, shading and green infrastructure, which can all serve to reduce internal temperatures. To reinforce this, new development will also be expected to provide appropriate mitigation measures to address overheating, and the plan will strongly encourage the use of blue-green infrastructure and urban greening as sustainable cooling options for both internal and external environments.

19 Promoting Sustainable Waste Management

Policy 98

Strategic Objective

Waltham Forest builds its resilience through addressing sustainability, efficient waste management and the effects of climate change through all stages in the development process.

19.1 As the borough's population grows it is expected that more waste would be generated. Waste management refers to the activities required to manage waste from its generation to its final disposal. Waste is produced by everybody in everyday life in London and in Waltham Forest. This includes individuals, households, businesses and organisations.

19.2 Historically, waste management has involved the collection of waste and its subsequent transportation for disposal at landfill sites. These days greater focus is placed on the environmental impacts of waste generation and the importance of using resources efficiently. Accordingly, there has been significant changes to waste management evident by the increasing opportunities for residents to separate waste prior to kerbside collections, efficient transportation of materials, use of advanced mechanical recycling facilities and even use of waste as a renewable energy source. The increased focus on the importance of management means that an appropriate network of waste management facilities must be planned for locally.

19.3 The seven North London Boroughs, as Waste Planning Authorities (WPA) are preparing a Waste Local Plan. This requirement comes from Article 28 of the European Union (EU) Waste Framework Directive, the National Waste Management Plan for England and the National Planning Policy for Waste (NPPW). The partnership project involves the London Boroughs of Barnet, Camden, Enfield, Hackney, Haringey, and Islington & Waltham Forest.

Policy 99**Waste Management**

Sustainable management of waste will be achieved by:

- A. Working in partnership with the North London Waste Authority (NLWA) and the North London Boroughs to meet the London Plan apportionment and recycling targets;
- B. Ensuring compliance with the policies set out in the adopted North London Waste Plan, in particular, to safeguard existing waste sites in Waltham Forest unless compensatory provision is made in the borough or sub-region which maximises waste capacity in line with the provisions of the North London Waste Plan.
- C. Promoting the prevention and reduction of waste produced in the Borough, increasing the reuse of materials wherever possible, and seeking to increase recycling and composting of waste;
- D. Ensuring that new development including change of use provides accessible, adequate and well designed internal and external storage facilities for residual waste and recycling; and
- E. Ensuring that waste is minimised during construction of new developments, encouraging the use of sustainably sourced materials and requiring developments to make on-site provision for the recycling and re-use of construction and demolition waste.

19.4 This policy must be read in conjunction with other policies of the Plan including Policy 66 (Delivering High-Quality Design), Policy 68 (Amenity), Policy 73 (Freight and Servicing) and Policy 95 (Sustainable Design and Construction).

19.5 The London Plan projects how much Local Authority Collected Waste (LACW) and Commercial and Industrial Waste (C&I) is likely to be generated in the capital over the next 20 years and apportions an amount of these two waste streams to each borough. The North London Boroughs have pooled their apportionment to meet this collectively through existing sites and land allocated in the [North London Waste Plan](#).



19.6 The North London Waste Plan (NLWP) is currently at the Proposed Submission Stage (Regulation 19) and will be submitted to the Secretary of State for examination during Summer 2019. The plan identifies a range of suitable sites/areas to meet the north London boroughs' future waste management needs and thereby support increased self-sufficiency for London and better use of resources. It sets out a

range of policies designed to support determination of planning applications for waste facilities as well as ensure a more general and sustainable approach to waste and resource management.

19.7 The NLWP plans for all principal waste streams including:

- Local Authority Collected Waste (LACW): Waste collected by a Local Authority, including household and trade waste;
- Commercial and Industrial (C&I): Waste produced by businesses and industry;
- Construction, Demolition & Excavation (CD&E): Waste generated as a result of delivering infrastructure projects, building, renovation and the maintenance of structures;
- Hazardous: A sub category of all waste streams where the material produced is hazardous and requires specialist treatment;
- Agricultural waste: Waste produced by farming and forestry activity;
- Waste Water / Sewage Sludge: Waste produced from washing, cleaning and hygienic activities to create waste water and sewage effluents; and
- Low level radioactive waste (LLW): Waste associated with the undertaking of xrays and laboratory testing using low level radioactive substances.

19.8 As part of the North London Waste Authority, the Council will ensure that waste and refuse is dealt with sustainability and in alignment with the North London Waste Plan (NLWP) once it is adopted as well as during the interim period before its adoption. This plan will also ensure the protection and retention of existing waste sites as required in the London Plan.

19.9 The NLWP contains policies covering the following issues:

- Existing waste management sites;
- Locations for new waste management facilities;
- Windfall sites;
- Re-use & Recycling Centres
- Assessment criteria for waste management facilities and related development;
- Energy recovery and decentralised energy;
- Waste Water Treatment Works and Sewage Plant; and
- Control of Inert Waste

19.10 Once adopted the NLWP will form part of the overarching planning framework used for the determination of planning applications relating to proposed or existing waste facilities in Waltham Forest and North London generally.

19.11 The Council is committed to moving the management of waste up the 'waste hierarchy', reducing the amount of waste produced and increasing the reuse, recycling and composting, and converting waste to energy, with waste disposal only as a last resort.

Provision of Waste Facilities in New Developments

19.12 The Council has published separate guidance for developers on the provision of waste and recycling facilities in new developments ([Waltham Forest Waste and Recycling Guidance for Developers](#)) This sets out operational requirements and

standards expected relating to the provision of external waste storage areas/spaces for dry recycling, food waste recycling and measures to enable safe, regular and easy refuse collections and to alleviate traffic congestion.

20 Delivering the Plan

20.1 This section provides an overview of the ways in which the Council will deliver and monitor the delivery of this Local Plan, including its Vision, Strategic Objectives and Policies, including how the Council will:

- Take forward and implement the overall spatial strategy and areas based policies as set out;
- Make use, where appropriate, of the Councils planning powers and tools to support the delivery of sites allocated in the plan;
- Make use of Planning Obligations and the Community Infrastructure Levy (CIL) to mitigate development impacts and fund essential infrastructure;
- Take account of development viability, risk and contingency;
- Monitor the progress and success of the plan;
- If required, trigger a review of the plan.

Implementation

20.2 The Local Plan sets out how the borough will develop over the plan period to 2035, including the planning policies and proposals that will help our vision become reality.

20.3 The development management process will be the key way in which the Local Plan will be implemented. Both the overall spatial strategy and the detailed policies of the Local Plan will provide the starting point for the determination of planning applications, together with the National Planning Policy Framework (NPPF), the London Plan and any other relevant Supplementary Planning Documents (SPD's), Neighbourhood Plans or other material considerations where relevant.

20.4 The Local Plan therefore has an important role to play in influencing and providing a positive framework for planning and investment decisions, however, policies in isolation will not be sufficient to deliver this plan – it is important that there are tools in place to help the borough, its stakeholders and investment partners to implement these and to ensure the successful delivery of the overall spatial vision for the Waltham Forest.

20.5 The Council has a key place-shaping role to play and will make use of all appropriate mechanisms and assets, including:

- Producing more detailed guidance in the form of Supplementary Planning Documents (SPD's), Development Plan Documents (DPD's), masterplans or planning briefs to support community, landowners or developers with specific area based regeneration and delivery, particularly where new development opportunities arise over the life-time of the plan;
- Proactive coordination of the borough's statutory and non-statutory functions, including (but not limited to) as Local Planning Authority, Education Authority, Local Highways Authority, Lead Local Flood Authority, Public Health Commissioner, supported by other key departments including Parks and Open

Space, Community Safety, Air Quality and Design and Conservation, amongst others;

- Facilitating access to government grants as they arise, European funding and prudential borrowing;
- Strategically prioritised investment of the Council's Community Infrastructure Levy (CIL) and Carbon Offset Fund (COF);
- Effective and efficient use of Section 106 Agreements to secure affordable housing provision and mitigate the impacts of development at the local level, such as impacts on Air Quality;
- Working in partnership with other statutory delivery agencies (e.g The Greater London Authority, TfL, Waltham Forest Clinical Commissioning Group (CCG), Utility companies including water, electric and gas, the Environment Agency, Natural England, Sport England etc) to ensure that essential infrastructure is provided;
- Working in a positive spirit of partnership with landowners and developers and other private sector organisations including Business Improvement Districts, Trader Associations and other business networks to secure deliverable development proposals and investments;
- Engaging with education and skills providers and other organisations to support skills and training initiative in the Borough;
- Use of funding and incentives available through opportunities like Housing Zones and Enterprise Zones;
- Efficient and effective application of Development Management, Enforcement and other regulatory functions;
- Use of the Council's Compulsory Purchase powers to assist with site assembly challenges where appropriate;
- Support for locally driven aspirations including Neighbourhood Planning, Assets of Community Value (ACV) and other local initiatives;
- Use of other funding sources and mechanisms such as Housing Infrastructure Fund, Good Growth Fund, New Homes Bonus, Business Rates Retention, National Heritage Lottery Fund, development incentives and other incentives as and when they arise;
- Proactive use of the Councils assets to facilitate and assist delivery.

20.6 In addition to the planning framework, the Council will progress the delivery and implementation of supporting regeneration delivery plans for various strategic growth areas and town centres.

20.7 Local and National Funding

20.8 One of the fundamental requirements for the successful delivery of this Local Plan will be the ability to leverage investment in key infrastructure to enable and support sustainable growth and development. There is a wide and continually evolving range of funding options that can be utilised to support growth, infrastructure delivery and environmental improvements. These include opportunities such as:

- The Housing and Infrastructure Fund (HIF)

- The Mayor of London's Good Growth Fund
- Heritage Lottery Funding (HLF)
- GLA Green Capital Grants
- Housing Zone funding, such as that secured for Blackhorse Lane

20.9 With regard to improvements in transport infrastructure, funding opportunities include:

- Local Implementation Plan (LIP) 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

Planning Obligations and Developer Contributions

20.10 Development proposals will be expected to provide or make a contribution toward the cost of providing what is necessary to support the new development. Developer contributions are an important element towards meeting the cost of funding infrastructure and facilitating sustainable growth.

Planning Obligations

20.11 Planning Obligations, also known as Section 106 Agreements (Section 106 of the Town and Country Planning Act 1990 (as amended)) are binding legal agreements made between Local Authorities and developers and can be attached to a planning permission to make development proposals acceptable which would otherwise be unacceptable in planning terms. The land itself, rather than the person or organisation that develops the land, is bound by a Section 106 Agreement, something any future landowner will need to take into account.

20.12 Planning Obligations are used for three principal purposes:

- **Prescribe** the nature of development e.g requiring a given proportion of housing is affordable;
- **Compensate** for the loss or damage arising from a development e.g loss of employment or open space
- **Mitigate** a developments impact e.g through increased public transport provision

20.13 Planning Obligations will be requested in accordance with Regulation 122 of the CIL Regulations 2010 (as amended) (or any successor regulations). Planning Obligations must be:

- i. Necessary to make the development acceptable in planning terms;
- ii. Directly related to the development; and
- iii. Fairly and reasonable related in scale and kind to the development.

20.14 Where alterations or improvements to the public highway are required as part of a development proposal, developers will be required to enter into a Section 278 agreement (Section 278 of the Highway Act 1980).

20.15 For cases where a highway scheme requires developers to offer up land within their control for adoption as public highway, a developer may complete the construction of a road and then offer it to the Highway Authority under Section 37 of the Highways Act 1980, however Section 38 is more desirable due to the fact that the Council has no power to insist that the road is constructed to an adoptable standard, or that it will then be offered up for adoption. However, if a Section 38 agreement is made before construction starts the Council can ensure that it is built to the appropriate standard, including being lit and drained.

Community Infrastructure Levy (CIL)

20.16 The Community Infrastructure Levy came into force in April 2010 and allows authorities to raise funds from new development in their area. The CIL is payable based on the type and use of the floor space proposed and provides a standardised method for calculating contributions.

20.17 CIL must be spent on infrastructure, as defined by the Planning Act 2008; roads and other transport facilities, flood defences, schools and other educational facilities, medical facilities, sporting and recreational facilities and open spaces. This is broadly the definition of types of infrastructure the Local Plan makes provision for, as set out in detail in the Infrastructure Delivery Plan (IDP).

20.18 The borough adopted CIL in May 2014. CIL receipts contribute towards strategic infrastructure to support the overall development, growth and regeneration of Waltham Forest, as set out in the Boroughs Adopted Regulation 123 list.

20.19 Developments will not be double charged for Infrastructure via both CIL and planning obligations. The Council must ensure that planning obligations are not used to fund infrastructure they intend to fund via CIL. Planning obligations will also not be used to secure tariff based contributions given that once an authority introduces CIL in their area, it can no longer pool more than 5 contributions for infrastructure capable of being funded by CIL. However, as above, planning obligations will continue to play an important role in making individual development acceptable in planning terms. Affordable housing will continue to be delivered through planning obligations rather than by CIL. The Council will also continue to pool contributions for measures that cannot be funded through CIL e.g non-infrastructure items such as contributions towards Employment and skills provision.

Policy 100**Infrastructure and Developer Contributions**

The Local Planning Authority will support development proposals that provide adequate contributions towards:

- A. Measures to directly mitigate its impact and make it acceptable in planning terms
- B. Physical, social and community, green and transport infrastructure to meet the needs associated with the development.
- C. Development proposals will be required to test the quality and capacity of existing infrastructure, in partnership with the Council and other infrastructure and service delivery stakeholders as necessary, and make contributions to support the timely provision of improvements and/or additional capacity.
- D. Infrastructure provision or enhancements should be provided on-site as an integral part of a development wherever possible and appropriate.
- E. Where on-site provision is not possible or not the most appropriate means by which to secure the timely and most efficient delivery of such enhancements or provision, planning obligations will be required to secure a financial contributions to meet the reasonable costs of provision to support the development or offset its impact.
- F. Where a contribution towards other infrastructure improvements or provision is required and it is both reasonable and viable, this will be achieved through planning obligations planning conditions and/or the Community Infrastructure Levy.

Planning Obligations

- G. Planning Obligations will be sought in line with Regulation 122 of the Community Infrastructure Levy Regulation 2010 (as amended) or successor regulations and guidance.
- H. The Council will also require pooled contributions for measures that cannot be funded through CIL, as set out in the Council's Planning Obligations Supplementary Planning Document (SPD).
- I. Development proposals that do not suitably mitigate their impacts will not be supported.

Community Infrastructure Levy (CIL)

- J. All development proposals will be liable to pay the Community Infrastructure Levy (CIL) in accordance with the Borough's Adopted CIL Charging Schedule
- K. All development proposals will be required to pay the Mayoral Community Infrastructure Levy (MCIL) in accordance with the Mayor of London's Adopted MCIL Charging Schedule

Planning Conditions

20.20 Where appropriate, rather than refuse a planning application, the Local Planning Authority may grant permission subject to conditions. Such conditions will normally be in relation to:

- Details that need to be confirmed before the permission can be implemented, known as pre-commencement conditions e.g approval of materials to be used;
- Restrictions on the work needed to implement the permission e.g the hours in which vehicles can access the construction site;
- Restrictions on the use or operation of the development once complete e.g any subsequent change of use.

20.21 The Local Planning Authority is required to give reasons for the conditions when a decision is issued. The Local Planning Authority encourages applicants to undertake early consultation with officers prior to the application being submitted as it may be possible to broadly agree the nature of conditions that officers or the planning committee are likely to impose.

20.22 If an applicant wishes to contest the imposition of a planning condition, they can appeal to the Secretary of State. In addition, Section 73 of the Town and Country Planning Act 1990 'determination of applications to develop land without conditions previously attached' permits applications to remove planning conditions or to vary planning conditions following the grant of planning permission.

Infrastructure Delivery Plan

20.23 The Local Plan will be supported by an updated Infrastructure Delivery Plan (IDP). The purpose of the IDP is to set out:

- What infrastructure is required to support growth;
- Where it is required;
- When it is required;
- How much it costs;
- How it is to be funded; and
- Who is responsible for its delivery

20.24 The Borough wide IDP will also be supplemented by Site Delivery Plans, where necessary. The IDP and any supporting infrastructure delivery analysis should be considered a 'live document' and will be updated regularly to ensure progress is measured and ensure funding, initiatives and actions are targeted.

20.25 Government has also set out an intention to require Local Planning Authorities to produce an Annual Infrastructure Funding Statement (IFS) as of December 2019. The intended purpose of the IFS is to improve transparency and accountability around the spending of the Community Infrastructure Levy (CIL) and Section 106 Planning Obligations.

Viability and Contingency

20.26 The Council and its stakeholders recognise that the housing and commercial property markets are inherently cyclical and that this plan has been prepared at a time when the market has experienced a period of sustained economic and value growth, albeit with a decreasing level of confidence and certainty in the wider London and national economy arising from the referendum on the UK's membership of the European Union.

20.27 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.

Risk and Contingencies

20.28 The Council will strive to ensure the comprehensive delivery of the Strategic Vision and Objectives of the Local Plan and the policies contained within it. Presently, the Council has no reason to believe that the plan will not be implemented in full. However, the Council accepts that there could be circumstances where development fails to come forward for a number of reasons, whether that be delivery challenges on a site by site basis or due to a more general slowdown in the market and its ability to deliver viable development and regeneration – some of which is beyond the control of the Council. Where the Council is able to use its powers and influence to enable or support delivery of the Local Plan, it will proactively consider the case for doing so.

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

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

20.30 In addition to annual performance monitoring through the AMR, at the end of 5 years after the adoption of the Local Plan, the Council in conjunction with its stakeholders will undertake a comprehensive analysis of the cumulative housing, employment and infrastructure delivery to date in the Borough. If delivery is lagging significantly behind the projected cumulative target for the period or delivery is not being supported or guided by the policies of the plan, the Council will undertake a review of the Local Plan and its implementation mechanisms to create a conducive environment for key sites to come forward for delivery.

Monitoring Strategy and the Authority Monitoring Report

20.31 The Local Plan sets out how the Borough will develop over the plan period to 2033, identifying where the homes, jobs, services and infrastructure will be delivered and the type of distinctive places and environments that we want to see created.

20.32 Monitoring allows us to understand whether policies have worked as intended. It enables decisions to be taken that are well-informed and grounded in an understanding of the effectiveness of policy based on evidence.

20.33 Monitoring the impact of the plan is crucial to the successful delivery of our current plan and to inform the development of any future development plan for the Borough. Statutorily, under Section 113 of the Localism Act 2011 and Section 35 of the Planning and Compulsory Purchase Act 2004, each year the Council must produce reports which assess the implementation of the Waltham Forest Local Plan and the extent to which its policies and targets are being achieved. The Council can decide what to include in the AMR but must ensure they are prepared in accordance with the relevant legislation. The key aim of the Monitoring Strategy is to:

- assess borough wide development performance against targets
- track changes and trends which may develop over time, particularly in a time of economic uncertainty;
- assess whether the plan and its policies are effective and achieving their aims in terms of responding to our housing, employment, service and infrastructure needs, whilst ensuring the delivery of sustainable development;
- To track and account for wider social, environmental and economic issues affecting the key drivers of spatial change.

20.34 The Council, in its role as Local Planning Authority also has a requirement to:

- input into regional and national monitoring;
- to monitor our progress towards both the Local Plan and wider Council Corporate Plan objectives;
- report to Elected Members and the public on local planning issues, with the aim of building trust and confidence in the wider planning system.

20.35 All authority monitoring reports must comply with UK and EU Legislation set out in Directive 2001/42/EC known as the [Strategic Environmental Assessment Directive \(the SEA Directive\)](#) .

20.36 The Directive requires that monitoring arrangements must be established to allow the actual significant effects of the adopted Local Plan to be tested against those predicted, and to enable appropriate remedial action to be taken if required. These arrangements are detailed in the sustainability appraisal report and are intended to provide important feedback on the success of the plan and progress towards delivering sustainable development.

20.37 Appendix 3 sets out the performance indicators and targets by which the progress of this plan will be monitored. In monitoring outcomes, a [proactive approach will be used. Where necessary, new indicators will be created and obsolete indicators will be deleted or amended to meet changing circumstances in the way data is collated.

20.38 Some of the indicators that have been included will be influenced by many factors and not just the Local Plan, but they still provide a useful way of monitoring the overall outcomes that the document is seeking to help the Borough achieve. For some policies, quantitative indicators will not be appropriate and the main focus will be on monitoring whether there have been any significant challenges with implementing the policies through the development management process, for example because of a change in circumstances. For other policies, it will be important to monitor key projects that will help deliver those policies, not all of which will be specifically mentioned in the Local Plan. It will also be important to monitor the wider policy context, to ensure the Local Plan remains consistent and in conformity to the London Plan, National policy and other key plans and strategies which influence growth and development in the Borough.

20.39 If, as a result of monitoring, issues are identified in terms of a policy not achieving its intended outcome, or key policy and delivery targets are not being met, this may give rise to or trigger a review of the Local Plan and the policies contained therein (see page 212, Reviewing the Plan).

Managing Supply of Housing Land

20.40 Appendix 3 of this Local Plan sets out further details for monitoring delivery of the Borough's housing requirement of 27,000 dwellings over the plan period. As this plan proposes a stepped housing trajectory, the housing land supply position will be calculated with reference to the proposed requirements for each year. The position will be confirmed by an annual statement in the AMR.

Managing a Supply of Housing and the Housing Delivery Test (HDT)

20.41 The introduction of the Housing Delivery Test (HDT) alongside the updated NPPF in 2018 necessitates keeping track of the Borough's record of delivery of homes against requirements.

20.42 The HDT compares the net homes delivered over the preceding three years to the homes that should have built over the same period. Full details of the methodology are set out in the HDT Measurement Rule Book ⁽⁴⁾.

20.43 The outcome of the HDT is published annually by Government in November, and if delivery falls below 95% of the requirement, Local Authorities are expected to produce a Housing Delivery Test Action Plan by April. The position in the previous test and the expected outcome of the forthcoming test will be set out in the AMR.

Reviewing the Local Plan

20.44 As required by the National Planning Policy Framework (NPPF, para 33) and Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012, the Local Planning Authority will initiate a full review of the plan within 5 years of adoption. The purpose of the review is to ensure the Boroughs development frameworks takes account of changing circumstances affecting the area, or any relevant changes in national planning or plan making policy. Relevant strategic policies will need updating at least once every five years if the Boroughs local housing need figure has changed significantly or is expected to change significantly in the near future.

20.45 As part of the overall Monitoring Strategy, the Council will monitor progress towards the achievement of key growth targets as set out in Policy 101. Monitoring is required to ensure that the policies set out in the plan are relevant and effective. Regular monitoring will include analysis of delivery data and trends, take account of changes in legislation at the sub-regional and national level and reviewing the plans supporting evidence base where necessary. Monitoring progress against targets also provides a basis to trigger a whole or partial review of the plan, policies, strategies or actions to reflect changing circumstances.

4 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728523/HDT_Measurement_Rule_Book.pdf

Policy 101**Monitoring and promoting the achievement of growth targets**

The Council will monitor progress towards the achievement of the key targets for growth (housing, including affordable housing, employment space and retail) annually as part of the Council Authority Monitoring Report (AMR). In the event that delivery falls significantly behind that which is required to achieve these targets, the Council will trigger a full or partial review of the plan in order to address the reason/s for under-delivery.

Key indicators that would trigger a full or partial review are:

- A failure to demonstrate a 5 year housing land supply in any monitoring year with the following 2 monitoring years indicating no recovery in the position;
- Housing completions fall more than 15% beneath the targets in the housing trajectory over any rolling 3 year period;
- The delivery of employment space falls more than 20% beneath the target over any rolling 3 year period;
- An inadequate supply of employment sites/opportunities to meet the targets set in the plan;
- The delivery of retail space falls more than 20% beneath target over a rolling 3 year period;
- An inadequate supply of retail sites/opportunities to meet the targets set in the plan.