



**London Borough of Waltham Forest  
Proposed Submission Local Plan Part 1 (Regulation 19)  
Sustainability Appraisal Report**



**Waltham Forest**

**Date:** 21 October, 2020

**Prepared by:**

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## Quality Management

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# 1 Introduction

## 1.1 Background

The London Borough of Waltham Forest (LBWF) Council are now consulting on the second stage of the new Local Plan. This version of the Local Plan takes into account changes made to the Draft Local Plan in response to issues raised during the public consultation stage and new information since the Draft Local Plan was published in July 2019.

A new Local Plan is needed to support the Council's aspirations for growth, including significant new housing and sustained economic growth, to provide jobs for local people and increase the supply of housing, including affordable units. The LBWF are working towards the preparation of the Proposed Submission version of the Local Plan, which will guide development in the Borough and when adopted, will replace the currently adopted Core Strategy for the London Borough of Waltham Forest. The Council's Local Plan is being produced in two parts. The Proposed Submission Version of the Local Plan is the overarching strategic policy document and represents Part 1 of the Local Plan and the Site Allocations Document represents Part 2 of the Local Plan. The Local Plan Part 1 (LP1) contains policies which set out the level of growth to be delivered over the plan period, a spatial strategy including strategic development locations and development management policies. The Site Allocations Document (LP2) sits underneath the Local Plan Part 1 in the development plan hierarchy. It presents proposed site allocations which will deliver the growth set out within LP1.

This SA report relates to the Proposed Submission Local Plan (LP1). Development Plan Documents must be subject to a Sustainability Appraisal (SA), an integral part of the plan preparation process. This must also incorporate the requirements of the Strategic Environment Assessment (SEA) Directive. This SA report has been carried out on behalf of LBWF by ClearLead Consulting Ltd to help integrate sustainable development into the Proposed Submission Local Plan (LP1). It is being published and consulted on under Regulations 19 of the Town and Country Planning (Local Development) (England) Regulations 2012 and it will inform the development of the new Local Plan.

SA assesses the significant environmental, social and economic effects of the Local Plan, the “reasonable” alternatives to the Plan’s strategy, policies and proposals; and the reasons for discounting alternatives. It also incorporates a process called Strategic Environmental Assessment (SEA). SA of Local Plans is required under Section 19 of the Planning and Compulsory Purchase Act 2004. The National Planning Policy Framework (July 2008) also requires SA of Local Plans.

Strategic Environmental Assessment (SEA) in England is mandated by the SEA Directive (Directive 2001/42/EC: Assessment of the Effects of Certain Plans and Programmes on the Environment) and is regulated by the Environmental Assessment of Plans and Programmes Regulations 2004 Statutory Instrument No.1633 ('the SEA Regulations'). The SEA Directive aims at a high level of protection of the environment, and to integrate the consideration of the environment into the preparation and adoption of plans and with a view to promoting sustainable development.

## 1.2 This document

This document is the SA Report for the Proposed Submission Local Plan (LP1) - Regulation 19. The remaining sections of this document are structured as follows:

- **Section 2 Methodology** describes the approach to the SA;
- **Section 3 The Scope and Content of the draft Proposed Submission Local Plan** and sets out its vision and objectives
- **Section 4 Review of Other Programmes and Plans** describes how the context of SA. This section is supported by Appendix A;
- **Section 5: Summary of Baseline Data** including key sustainability issues, data gaps and future evolution of the baseline. This section is supported by Appendix B;
- **Section 6 Alternatives** describes the alternatives identified and assessed, the findings of the assessment of alternatives and the reasons for choosing the alternatives. This section is supported by Appendices D and E and ;
- **Section 7 Results of the Assessment of the Proposed Submission Local Plan** presents the potential significant effects of the Proposed Submission Local Plan. This section is supported by Appendix C;
- **Section 8 Potential Cumulative Effects** describes cumulative effects which may arise from the local plans of neighbouring boroughs, as well as projects occurring in and around Waltham Forest.
- **Section 9 Mitigation Measures** presents the measures put forward to offset potential significant negative and uncertain effects of the policies and improve their sustainability performance;
- **Section 10 Monitoring** presents proposals for monitoring the potential effects of the Proposed Submission Local Plan; and
- **Section 11 Next Steps** sets out the next activities in the SA and Local Plan.

## 1.3 Sustainability Appraisal and Strategic Environmental Assessment

SA of Local Plans is required under sections 19 of the Planning and Compulsory Purchase Act 2004. The National Planning Policy Framework (February, 2019) also requires SA of Local Plans. The SA must incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations). The SEA Regulations transpose the SEA Directive (2001/42/EC) into English law and applies to a range of plans and programmes, including Local Plans. The SEA Directive aims at a high level of protection of the environment, and to integrate the consideration of the environment into the preparation and adoption of plans and with a view to promoting sustainable development.

Within the context of local planning in England, it is accepted practice to integrate the requirements of SA and SEA into a single assessment process, as set out in the Planning Practice Guidance <http://planningguidance.communities.gov.uk/> (updated 2014). The purpose of SA is to appraise the environmental, social and economic effects of plans and programmes. The SA 'testing' of the Local Plan policies and their reasonable alternatives will help to develop the most sustainable policies and proposals as an integral part of the plan's development.

## 1.4 Habitats Regulations Assessment

In the UK, the Habitats Directive (92/43/EEC) has been transposed into domestic legislation as the Habitats Regulations 2010 which requires an assessment of any plans which are likely to have a significant effect on any protected European sites, i.e. Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar wetland sites. This is commonly referred to as a Habitats Regulations Assessment (HRA). This requirement includes strategic plans with an impact on land use.

HRA screening was undertaken of the Direction of Travel document and published within the accompanying SA report for the Regulation 18 Local Plan Part 1.

The screening identified a number of 'likely significant effects' on two European sites (Epping Forest SAC, and Lee Valley SPA and the Lee Valley Ramsar site) which would require further investigation through Appropriate Assessment (AA) in the context of the draft Local Plan (Regulation 18). Screening identified that the AA needs to consider the following:

- Recreational pressure;
- Air pollution;
- Urbanisation;
- Water pollution;
- Hydrological changes;
- Invasive species; and
- Spread of diseases.

A HRA of the Local Plan Part 1 was subsequently prepared and this addressed potential impacts from growth within Waltham Forest Local Plan Part 1. The Regulation 19 Local Plan policies have been rescreened in September 2020. No new LSEs have been identified. The HRA Report has been updated to reflect the Regulation 19 Local Plan Part 1 and has been able to conclude that there will be no adverse effects on the Lee Valley SPA and Ramsar site and no adverse effects on either European site in relation to water demand and water pollution.

However, it has not been possible to conclude the assessment in relation to potential air pollution effects on Epping Forest SAC nor the potential for in combination effects with Epping Forest District Council's Local Plan in relation to recreational pressure and 'urban effects' (defined as fly-tipping, fire setting, spread of diseases etc). An air quality assessment to provide evidence for the HRA will be completed in November 2020 which at which point an addendum to the HRA Report will be issued. When more information is available in relation to the Epping Forest District Council Local Plan, the HRA will be concluded with regards to potential in combination effects.

## 1.5 How to comment on this document

This report is being consulted on with the statutory consultees<sup>1</sup> to confirm that it provides sufficient information to ensure that a robust and legally compliant SA is carried out. Other interested parties are also being notified and the document will be also available on the Council's website.

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<sup>1</sup> Environment Agency, Historic England and Natural England.



The consultation period will be seven weeks from 26<sup>th</sup> October until 14<sup>th</sup> December 2020. We would welcome your views on this SA Report. A series of questions are set out below in order to guide responses.

**Questions to guide responses:**

1. Do you agree that all of the reasonable alternatives have been identified?
2. Do you agree that the potential significant effects identified in the assessment and the alternative options are correct?
3. Do you agree with the proposed mitigation?
4. Do you agree with the proposed monitoring schedule?

**How to comment:**

Please provide responses by **14<sup>th</sup> December 2020** to:

Planning Policy Team, London Borough of Waltham Forest,  
First Floor,  
Magistrates Court,  
Town Hall Complex,  
Forest Road,  
1 Farnan Avenue  
London  
E17 4NX

## 2 Approach to the SA

### 2.1 SA process and requirements

The SA process is shown in Figure 1. Stage A, Scoping, was completed in September 2017 for the draft Local Plan and has been updated in March 2020 for the Proposed Submission Local Plan (LP1).

This SA Report encompasses Stages B and C of the SA process (evaluation of the proposed Local Plan against the SA Framework and SA report preparation) and fulfils the requirements to:

- Evaluate the potential effects of the Local Plan implementation
- Identify and propose mitigation of significant adverse effects
- Propose appropriate monitoring of significant effects

**Figure 1: The SA Process**

Local Plan Stage 1: Pre-production - Evidence Gathering	SA Stages and Tasks
	<p>Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope</p> <p>A1: <i>Identifying other relevant policies, plans and programmes, and sustainability objectives</i></p> <p>A2: <i>Collecting baseline information</i></p> <p>A3: <i>Identifying sustainability issues and problems</i></p> <p>A4: <i>Developing the SA Assessment framework</i></p> <p>A5: <i>Consulting on the scope of the SA</i></p>
Local Plan Stage 2: Production	<p>Stage B: Developing and refining options and assessing effects</p> <p>B1: <i>Testing the plan objectives against the SA assessment framework</i></p> <p>B2: <i>Developing the plan options and preparing an Initial or draft IIA Report (not a statutory report)</i></p> <p>B3: <i>Predicting the effects of the plan and its alternatives</i></p> <p>B4: <i>Evaluating the effects of the plan and its alternatives</i></p> <p>B5: <i>Considering ways of mitigating adverse effects and maximising beneficial effects</i></p> <p>B6: <i>Proposing measures to monitor significant effects of implementing local plans</i></p>
	<p>Stage C: Preparing the formal SA Report</p> <p>C1: <i>Preparing the formal SA Report</i></p>
	<p>Stage D: Consulting on the preferred options of the Local Plan and SA Report</p> <p>D1: <i>Public participation on the preferred options of the Local Plan and the SA Report</i></p> <p>D2(i): <i>Appraising significant changes</i></p>
Local Plan Stage 3: Examination	<p>SA Stages and Tasks</p> <p>D2 (ii): Appraising significant changes resulting from representations</p>
Local Plan Stage 4:	<p>SA Stages and Tasks</p> <p>D3: Making decisions and providing information</p>

Adoption and monitoring	Stage E: Monitoring the significant effects of implementing the Local Plan <i>E1: Finalising aims and methods for monitoring</i> <i>E2: Responding to adverse effects</i>
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## 2.2 Stage A: Scoping

The first stage (Stage A) of the SA process involved consultation on a SA Scoping Report which has been completed. In the SA Scoping Report, the topics set out within the SEA Regulations have been expanded into a number of sustainability topics as presented within Table 1 to include socio-economic topics as well as environmental. The SA topics are the same as those previously used in the SA of the Local Plan Part 1 (Regulation 18).

**Table 1: SA Topics Compared with SEA topics**

SA Topics	SEA Directive Topics
Population	Population
Human Health	Human Health
Economy	(not required by SEA Regulations)
Employment and Skills	(not required by SEA Regulations)
Transport	Material assets
Crime and Safety	Human Health
Housing	Material assets
Townscape and Heritage	Cultural heritage, including architectural and archaeological heritage. Material assets
Climate	Climatic factors
Air Quality	Air
Soil and Geology	Soil
Water	Water
Biodiversity	Biodiversity, fauna, flora
Landscape	Landscape
Waste	(not required by SEA Regulations)

The Scoping Report was consulted on with the statutory consultees<sup>2</sup> between 24<sup>th</sup> July to 29<sup>th</sup> August 2017 (a period of 5 weeks). The Scoping Report presented baseline information on the environmental, social and economic characteristics of the plan area, including the likely evolution of the baseline within the plan period. The Scoping Report set out a framework (called the 'SA Framework') for the assessment of the plan and its alternatives, identifying the significant effects that the assessment will need to focus on. The Scoping Report was amended following consultation and published in September 2017 as a post-consultation version. The final version of the SA Framework is shown in Table 2.

The baseline data and review of other programmes and plans presented in Sections 4 and 5 of this report (which are supported by appendices A and B) has been updated between January and August 2020.

<sup>2</sup> Natural England, Historic England, and the Environment Agency

**Table 2: SA Framework Objectives**

SA Objective	Description	Key Sustainability Issues
<b>SA1</b>	<b>Meet local housing needs through the provision of a range of tenures and sizes of new dwellings</b>	<ul style="list-style-type: none"> <li>As the population continues to increase so does the demand for housing, infrastructure and facilities</li> <li>The population density within the Borough exceeds both the London and the national averages</li> <li>There is a need to create high quality places to live, work and recreate that are mixed and well-balanced in terms of tenure and income</li> <li>Promote high quality housing with a range of tenures to reduce health issues which arise from poor quality accommodation</li> <li>There is a disparity between the cost of housing and the amount that people are able to borrow to purchase a home, which means that many people are unable to access the property market</li> <li>There is a shortfall in the provision of affordable housing to meet the requirements of those in housing need</li> <li>There is a potential shortfall in the provision of family accommodation and there is overcrowding, primarily in the private rental sector</li> <li>Homelessness is expected to increase</li> <li>Need to offer greater quality, flexibility and choice to those who rent.</li> <li>There is a need to increase the supply of well-designed housing of all tenures</li> <li>Need to introduce more flexible approaches for affordable housing contributions to encourage open market and mixed tenure specialist older people's housing.</li> </ul>
<b>SA2</b>	<b>Reduce crime and the fear of crime</b>	<ul style="list-style-type: none"> <li>Increases in racist and religious hate crimes</li> <li>The percentage of residents that are worried about crime in the Borough remains higher than the London average</li> <li>Need to provide safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life</li> <li>Need to develop an approach to tackling crime, improving liveability and reducing anti-social behaviour.</li> </ul>
<b>SA3</b>	<b>Improve standard of health and wellbeing of those who live and work in the Borough</b>	<ul style="list-style-type: none"> <li>Currently a large proportion of the population are aged over 50 and this is projected to rise over the next 20 years (+26% rise by 2021)</li> <li>Improve life expectancies through promoting healthy lifestyles for all ages</li> <li>Need to ensure adequate access to green spaces and recreational facilities to promote active and healthy lifestyles</li> <li>Need to increase recognition of the growing evidence of a relationship between physical and mental health</li> <li>Need to ensure that hospitals have fit for purpose facilities (i.e. less converted houses) that meet the needs of patients</li> <li>Need to increase levels of active travel throughout the borough in order to increase physical activity levels and tackle poor air quality.</li> <li>Childhood obesity rates are higher within Waltham Forest than both regionally and nationally</li> <li>TB remains a disease which is of high prevalence within the borough</li> <li>There is a need to protect open space of varying types, which is used heavily by residents of the Borough. For example, allotment space.</li> </ul>
<b>SA4</b>	<b>Improve community cohesion and reduce inequalities through the provision of</b>	<ul style="list-style-type: none"> <li>There are inequalities in health and life expectancy between ethnic groups</li> <li>Disparities between wards, particularly between the north and south of the Borough</li> </ul>

SA Objective	Description	Key Sustainability Issues
	<b>community facilities to meet local cultural, educational, recreational and social needs</b>	<ul style="list-style-type: none"> <li>• Need to provide inclusive services; promote equal opportunities; oppose discrimination, intolerance and disadvantage through reducing inequalities and promoting community cohesion</li> <li>• Help to support development of successful neighbourhoods</li> <li>• There is a need to create high quality places to live, work and recreate that are mixed and well-balanced in terms of tenure and income</li> <li>• Adequate support and facilities for older residents, including independent living, has been noted in particular to be needed</li> <li>• Need to build on borough's arts, culture and sport strengths across the borough's diverse and changing population.</li> <li>• Need to reduce the number of older people who feel socially isolated, by getting them actively participating in community life</li> <li>• Currently a large proportion of the population are aged over 50 and this is projected to rise over the next 20 years (+26% rise by 2021)</li> <li>• Need to ensure that growth supports the delivery of vital infrastructure and new facilities across the borough</li> <li>• Help to support development of successful neighbourhoods</li> <li>• Need to ensure that all residents have access to training and skills development to enable them to access and progress into high quality employment.</li> </ul>
<b>SA5</b>	<b>Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system, reducing car use for all journey lengths</b>	<ul style="list-style-type: none"> <li>• Continual growth in car ownership will contribute to further air pollution, and associated impacts on climate, human health and biodiversity</li> <li>• Need to work towards improving air quality and reducing noise impacts from transport</li> <li>• There is a need to make public transport more accessible in some areas of the Borough</li> <li>• There is a need to promote walking and cycling (building on Enjoy Waltham Forest ("Mini Holland") programmes) for local journeys in place of travel by private car. There should also be a focus on promoting public transport use instead of cars for medium and longer journeys</li> <li>• There is a need to reduce car parking spaces in order to discourage private car use and improve air quality</li> <li>• One in five journeys each weekday morning and afternoon involves trips to school, even though most journeys to schools are under a mile. There is a need to reduce school journeys by reducing Drop Off/Pick Up arrangements for new school developments, and encouraging sustainable, active travel amongst school pupils</li> <li>• As the population grows, so does the need to change current infrastructure to meet the demands of all residents whilst making it future proof</li> <li>• Need to ensure that growth supports the delivery of vital infrastructure and new facilities across the Borough</li> <li>• Need to provide public transport capacity and safeguard land for transport</li> <li>• Help to enhance London's transport connectivity</li> <li>• Improvements to road safety are needed to reduce casualties</li> <li>• Need to make cycle parking safe and easy to use</li> <li>• There is a need to provide electric vehicle infrastructure, such as charging points.</li> </ul>
<b>SA6</b>	<b>Prevent production of waste, improve resource</b>	<ul style="list-style-type: none"> <li>• The amount of waste produced is reducing but still exceeds both the London and national average</li> </ul>

SA Objective	Description	Key Sustainability Issues
	<b>efficiency and increase recycling and recovery</b>	<ul style="list-style-type: none"> <li>The London Plan encourages greater self-sufficiency for waste management in London and sustainable transportation of waste.</li> <li>Recycling is increasing but still falls short of government targets</li> <li>Need to ensure that growth supports the delivery of vital infrastructure and new facilities across the Borough</li> <li>Need to minimise the impact of municipal waste management on the Borough's environment</li> <li>Need to reduce the carbon footprint of municipal waste</li> <li>Need to ensure that all waste is managed in the most environmentally friendly way.</li> </ul>
<b>SA7</b>	<b>Reduce greenhouse gas emissions and promote low carbon growth</b>	<ul style="list-style-type: none"> <li>Greenhouse gas emissions need to be stabilised and reduced over time</li> <li>Help promote low carbon heat network</li> <li>Need to identify opportunities for growth of the low carbon economy in the Upper Lee Valley</li> <li>There is a need to provide electric vehicle infrastructure, such as charging points.</li> </ul>
<b>SA8</b>	<b>Conserve energy</b>	<ul style="list-style-type: none"> <li>There is a need to continue to promote the construction of energy efficient buildings, and to support the installation of renewable and low or zero carbon technology.</li> </ul>
<b>SA9</b>	<b>Improve air quality</b>	<ul style="list-style-type: none"> <li>Continual growth in car ownership will contribute further air pollution</li> <li>Reliance on the petrol or diesel-fuelled private car as the main mode of transport</li> <li>Air pollution from the strategic road network is an issue across the Borough and NO<sub>2</sub> emissions are remaining constant, not decreasing as predicted</li> <li>Increasing use of biofuels (biodiesel and biomass) for heating schemes will cause further air quality issues</li> <li>Need to help reduce pollution from road vehicles, buildings, industry and construction</li> <li>Need to improve efficacy of measures within the AQMA</li> <li>There is a need to provide electric vehicle infrastructure, such as charging points.</li> </ul>
<b>SA10</b>	<b>Improve water quality in rivers and groundwater and ensure the efficient use of water resources</b>	<ul style="list-style-type: none"> <li>Diffuse urban water pollution exists in local rivers and water bodies</li> <li>There should be no deterioration in the health and quality of existing water bodies and development should improve the status of water bodies to achieve 'Good Overall Status' in accordance with the Water Framework Directive', such as through installing rain planters and reed beds</li> <li>Increasing population will put strain on water resources</li> <li>Potential impacts of the Local Plan policies and site allocations on groundwater need to be identified and addressed.</li> </ul>
<b>SA11</b>	<b>Reduce the risk of flooding and improve resilience to climate change</b>	<ul style="list-style-type: none"> <li>High number of properties risk of flooding and there is a need to promote flood resistance and resilience measures for existing and future properties to ensure they are resilient to the future effect of climate change and protected against future flood risk. In response to this risk proposals have been developed for Critical Drainage Areas .</li> <li>Natural flood management techniques should be promoted</li> <li>New development will need to incorporate SUDS to sustainably reduce flood risk</li> <li>Need to promote the use of new technologies and innovation in flood mitigation measures</li> <li>There will be an increasing need to plan for and implement/facilitate climate change adaptation, in respect of rising temperatures, water</li> </ul>

SA Objective	Description	Key Sustainability Issues
		<p>scarcity and extreme weather events, particularly heavy rainfall/flooding</p> <ul style="list-style-type: none"> <li>• There is a need to plan and prepare for the expected impacts of unavoidable climate change by developing adaptation responses and building resilience</li> <li>• New developments need to minimise vulnerability and provide resilience to climate change</li> <li>• There is a need to work with communities to help tackle climate change.</li> </ul>
<b>SA12</b>	<b>Ensure the efficient use of land and buildings and protect soil quality and geological resources</b>	<ul style="list-style-type: none"> <li>• There is finite availability of previously developed land for development; this may result in the use of greenfield land in the future</li> <li>• There is a need to protect soils and the important ecosystem services they provide – particularly during construction and development</li> <li>• Need to protect designated geological sites.</li> </ul>
<b>SA13</b>	<b>Conserve and enhance biodiversity and the natural environment, improving resilience to climate change</b>	<ul style="list-style-type: none"> <li>• Support is needed to achieve local BAP targets</li> <li>• Need to promote effective land-management to support, protect and enhance biodiversity</li> <li>• Increases in population will cause a demand for more development, where there is a potential for loss of valuable habitats which have yet to be designated for nature conservation as a direct result</li> <li>• Consider and plan for the impacts of climate change on species and habitats</li> <li>• There is a need to help encourage people to engage with the ownership, design, management, maintenance and use of their environment as part of their own vision for their neighbourhood</li> <li>• Need to recognise the wider benefits of ecosystem services and manage impacts on biodiversity</li> <li>• Increase awareness that green infrastructure and resilient ecological networks play an important role in aiding climate change adaptation and resilience</li> <li>• Seek to enhance green infrastructure networks within the borough</li> <li>• Ensure current ecological networks are not compromised, and future improvements in habitat connectivity are not prejudiced</li> <li>• In line with NPPF paragraph 174, new development should achieve biodiversity net-gain in a hierarchical approach with on-site net-gain being preferred and off-site compensation as a last resort</li> </ul> <p>Need to work to conserve and enhance the local environment.</p>
<b>SA14</b>	<b>Protect the ecological integrity of SSSI and Natura 2000 sites</b>	<ul style="list-style-type: none"> <li>• Large areas of the SSSI sites are considered to be in either unfavourable with no change or to be in an unfavourable and declining condition</li> <li>• SSSIs and European sites within the Borough are under threat from poor air quality, recreational pressure and urban effects (including issues with litter)</li> <li>• Need to protect and enhance the wildlife and habitats in Waltham Forest, in particular those of international, national and regional importance.</li> </ul>
<b>SA15</b>	<b>Maintain and enhance the quality of the green belt and open space areas</b>	<ul style="list-style-type: none"> <li>• Large areas of open space are Metropolitan Green Belt. There is a need to protect these areas of open space from development pressure.</li> <li>• There is a need to protect open space of varying types, which is used heavily by residents of the borough. For example, allotment space.</li> </ul>

SA Objective	Description	Key Sustainability Issues
<b>SA16</b>	<b>Maintain and improve local distinctiveness</b>	<ul style="list-style-type: none"> <li>Need to establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit</li> <li>Need to work towards conserving local character and history, by reflecting the identity of local surroundings and materials. This should not prevent or discourage appropriate innovation.</li> </ul>
<b>SA17</b>	<b>Conserve and enhance the historic built environment</b>	<ul style="list-style-type: none"> <li>A number of listed buildings are identified as being in poor condition and are have been included on Historic England's Heritage at Risk Register. Opportunities exist to improve the condition of some listed buildings through development</li> <li>The borough contains 20 Archaeological Priority Areas where there is significant known archaeological interest or potential for new discoveries</li> <li>Ensure that the Conservation Areas, Heritage Assets and features are preserved or enhanced</li> <li>New developments should respect the urban and historic context, improve townscape and leave a positive architectural legacy</li> <li>Impacts of future development on the local historic environment need to be considered</li> <li>Heritage assets should be managed to sustain their significance</li> <li>Ensure that everyone is able to participate in understanding and sustaining their local historic environment</li> <li>Development could encroach on Conservation Areas and subsequently negatively affect townscape and heritage assets.</li> </ul>
<b>SA18</b>	<b>Maintain and enhance the vitality and viability of the Borough's town centres</b>	<ul style="list-style-type: none"> <li>Further action is needed in order to support and promote retail, business, cultural, leisure and residential investment in town centres.</li> <li>Support is required for the creation of the Creative Enterprise Zone around Blackhorse Lane.</li> </ul>
<b>SA19</b>	<b>Improve the local economy by enabling employment developments in appropriate places</b>	<ul style="list-style-type: none"> <li>Lower than average salaries could affect the Borough's ability to attract inward investment</li> <li>Continue to support the Upper Lee Valley Development Opportunity Area and celebrate its industrial heritage</li> <li>There are likely to be ongoing pressures on industrial sites, need to maintain industrial uses and promote strong local base of small businesses</li> <li>Need to provide additional workspaces and promote denser, mixed use development with no net loss of business floor space.</li> </ul>
<b>SA20</b>	<b>Maintain stable levels of employment in the Borough</b>	<ul style="list-style-type: none"> <li>Skills development in growth areas is also needed both for those who are currently unemployed or underemployed</li> <li>Encourage and promote flexible working arrangements for residents to support people when gaining skills and moving into employment</li> <li>Investment is needed so that local people have the skills and ability to seize local growth opportunities and they are able to access and progress into high-quality, better paid employment in the borough</li> <li>There are large inequalities in employment and skill levels. between wards within the Borough. Need to ensure that regeneration is inclusive</li> <li>Ensure that ongoing business growth becomes a driver of productivity and fairer wages (e.g. encouraging the London Living Wage), in order to create an increase in the overall prosperity of the Waltham Forest Borough</li> <li>There is a need to create fair employment and good work for all</li> </ul>

SA Objective	Description	Key Sustainability Issues
		<ul style="list-style-type: none"> <li>• In work support is needed to ensure sustainment of jobs, professional development and progression into better paid, secure higher quality jobs</li> <li>• Need to promote employment, training programmes and sector-based initiatives in the growth of skills to support creative and digital industries, construction and facilities management, retail and hospitality, and finance and business services.</li> </ul>

## 2.3 Stage B: Alternative Options assessment

The appraisal of the two spatial strategy options (the new strategy plus the option of continuing with the existing spatial strategy) along with the previous appraisal of the Local Plan Part 1 Direction of Travel document fulfils the requirements to identify, describe and evaluate the likely significant effects on the environment of “reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme”.

Policy direction options set out within the Local Plan Part 1 Direction of Travel consultation document<sup>3</sup> (November 2017) were assessed in September – October 2017. The policy directions options covered the following topics:

- Building a Resilient Economy
- Climate Change Resilience
- Creating High Quality Places
- Culture and Visitor Attractions
- Decent Homes for Everyone
- Enhancing and Preserving Heritage
- Meeting Social and Community Infrastructure Needs
- Protecting and Enhancing the Environment
- Providing Physical Infrastructure
- Town Centres and High Streets

A range of different options for addressing each topic were presented within the Direction of Travel document and each option was assessed against the SA Framework.

Two further spatial strategy options were also assessed as a part of the options stage. This assessment was undertaken in September 2018. The spatial strategy options consisted of a new strategy and the option of continuing the existing spatial strategy set out in the adopted Core Strategy. They underwent a SA, with each strategic option assessed against the SA Framework. The results of this process were collated and summarised in an internal report to LBWF officers, which was completed in September 2018.

The New Spatial Strategy included 16 clusters of development sites which have been called ‘Growth Areas’, ‘Hubs’, ‘Areas of Opportunities’ and ‘Future Potential Sites’. The SA process

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<sup>3</sup> Accessible here: <https://walthamforest.gov.uk/content/local-plan>



assessed the 16 clusters and the individual Growth Capacity sites contained within them. The individual Growth Capacity sites included within the clusters were assessed using the red, amber, green (RAG) rating method outlined in Section 2.4, which was then used to inform the overall assessment of each cluster.

In addition, there were a number of Growth Capacity sites which were located outside of the 16 clusters. At this strategic stage these were not assessed. Further details on the Alternative options assessment are provided within Section 6 of this report.

## 2.4 Stage C: Policies Assessment and Producing the SA Report

This stage involves identifying the significant environmental effects of the Local Plan including short, medium and long term; permanent and temporary; positive and negative effects and documenting the SA process and presenting the findings within an SA Report. All Local Plan policies have been assessed against the SA Framework and reference has been made to the baseline data and key sustainability issues in the Borough identified during the scoping stage. Significance criteria set out in Table 3 have been used to determine the potential sustainable performance of the policies.

A version of the Local Plan Regulation 19 policies was provided to the consultation dated 16<sup>th</sup> September 2020. All section of that version of plan, apart from Chapter 15 Active Travel, Sustainable Transport and Other Infrastructure, was assessed and the findings are provided in Appendix C and Section 7 of this report. Chapter 15 Active Travel, Sustainable Transport and Other Infrastructure was amended in a version of the Local Plan Regulation 19 policies dated 30<sup>th</sup> September 2020 and therefore the 30<sup>th</sup> September 2020 Chapter 15 was assessed in the SA and the findings of this assessment can be found in Appendix C and Section 7 of this report.

Table 3: Significance definitions for SA

Symbol	Definitions of Significance of Effects Against the SA Objectives	Assumptions on the nature of effects
++	<b>Significant Positive Effect:</b> the policy supports the achievement of this objective; it addresses all relevant sub-objectives and could result in a potentially significant beneficial effect e.g. improved access by walking and cycling modes to a local or town centre	Permanent Continual Magnitude: High 80%+ receptor or environmental capacity affected; or Medium 40-80% of receptor or environmental capacity of affected The effect could be to: <ul style="list-style-type: none"> <li>• enhance and redefine the location in a positive manner, making a contribution at a national or international scale;</li> <li>• enhance and redefine the location in a positive manner;</li> <li>• repair or restore receptors badly damaged or degraded through previous uses; and/or</li> <li>• improve one or more key elements/features/ characteristics of a receptor with recognised quality such as a specific regional or national designation.</li> </ul>
+	<b>Minor Positive Effect:</b> the policy supports the achievement of this objective; it addresses some relevant sub-objectives, although it may have only a minor beneficial effect	Reversible Infrequent or intermittent Magnitude: Low 20-40% of receptor or capacity affected. The size, nature and location of a proposed scheme would: <ul style="list-style-type: none"> <li>• improve undesigned yet recognised receptor qualities at the neighbourhood scale;</li> <li>• fit into or with the existing location and existing receptor qualities; and/or</li> <li>• enable the restoration of valued characteristic features partially lost through other land uses.</li> </ul>
0	<b>Neutral Effect:</b> the policy has no impact or effect and is neutral insofar as the benefits and drawbacks appear equal and neither is considered significant	N/A
?	<b>Uncertain Effect:</b> Uncertain or insufficient information on which to	N/A

Symbol	Definitions of Significance of Effects Against the SA Objectives	Assumptions on the nature of effects
	determine the assessment at this stage	
-	<b>Minor Negative Effect:</b> the policy appears to conflict with the achievement of this objective; it does not address relevant sub-objectives and may result in minor adverse effects	Reversible Infrequent or intermittent Magnitude: Low 20-40% of receptor or capacity affected. The size, nature and location of a proposed scheme would: <ul style="list-style-type: none"> <li>• be out of scale with the location; or</li> <li>• leave an adverse impact on a receptor of recognised quality such as a specific district or county designation.</li> </ul>
--	<b>Significant Negative Effect:</b> the policy works against the achievement of this objective; it could exacerbate relevant sub-objectives and may result in a potentially significant adverse effect e.g. loss of all or part of a designated ecological site of national importance.	Permanent Irreversible Continual Magnitude: High 80%+ receptor or environmental capacity affected; or Medium 40-80% of receptor or environmental capacity of affected The effect could be to: <ul style="list-style-type: none"> <li>• permanently degrade, diminish or destroy the integrity of the receptor;</li> <li>• cause a very high-quality receptor to be permanently changed and its quality diminished;</li> <li>• cannot be fully mitigated and may cumulatively amount to a severe adverse effect;</li> <li>• be at a considerable variance to the location, degrading the integrity of the receptor; and/or</li> <li>• will be substantially damaging to a high-quality receptor such as a specific regional or national designation.</li> </ul>

## 2.5 Assumptions and Limitations

The SEA Regulations require the SA Report to include a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.

Baseline data has been available across the Borough however there are cases where data gaps have been identified. This have been listed for each topic area in Section 5 of this report, Summary of Baseline Data. The baseline data was completed in September 2017 for the draft Local Plan and has been updated in January and August 2020 for the Proposed Submission Local Plan (LP1).

The assessment of policies, including spatial policies, has been undertaken as a desk-based exercise using the baseline information presented in Appendix B and using published GIS. No site visits have been undertaken specifically for the purposes of the SA.

Every effort is made to predict effects accurately; however, this is inherently challenging given limited understanding of precisely how the plan will be implemented and limited by understanding of the baseline. Given uncertainties there is inevitably a need to make assumptions. Assumptions are made cautiously and explained within the assessment text. The aim is to strike a balance between comprehensiveness and conciseness/accessibility to the non-specialist. In many instances, given reasonable assumptions, it is not possible to predict 'significant effects', but it is possible to comment on merits (or otherwise) of the draft plan and alternatives in more general terms.

Some assumptions and limitations are noted within the assessments of the policies as shown in Table 4. The appraisal findings have needed to make assumptions regarding future infrastructure delivery. In practice, however, infrastructure delivery is highly uncertain. If it is a case that infrastructure delivery lags behind housing development, or does not materialise at all, then the results of the assessment may alter.

Table 4: Assumptions and limitations made during the SA of Local Plan Policies

Policy	Assumption made
Policy 4: Location and Management of Growth	SA5: It has been assumed that references to social infrastructure do not include transport in line with the London Plan.
Policy 9: South Waltham Forest, Policy 10: Central Waltham Forest, Policy 11: North Waltham Forest	It is assumed that development which occurs within these areas will focus on currently potentially available development sites which are all previously developed land.
Policy 9: South Waltham Forest, Policy 10: Central Waltham Forest, Policy 11: North Waltham Forest	It has been assumed that a range of sizes and tenures of homes will be provided in line with Policy 14: Affordable Housing Tenure and Policy 15: Housing Size and Mix, in order to meet the needs of the Borough.
Policy 16: Accessible and Adaptable Housing	It has been assumed that this policy relates to all dwelling types, including apartments.

Policy	Assumption made
Policy 80: Parks, Open Spaces, Sport and Recreation	"Open Space" has been assumed to be referring to outside space which is open to the public, containing grass, trees and/or other vegetation.

## 2.6 How the requirements of the SEA regulations have been met

Table 5 outlines where elements of the SEA regulations are addressed within the report.

**Table 5: Fulfilling the Requirements of the SEA regulations**

What the regulations say <sup>4</sup>	How this is addressed
An outline of the contents, main objectives of the plan or programme.	Set out in Section 3 of this document.
An outline of the relationship with other relevant plans and programmes.	Set out in Section 4 of this document.
The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	Set out in Section 5 of this document and in Appendix B.
The environmental characteristics of areas likely to be significantly affected.	Section 3.3 of this document outlines the characteristics of the plan area in general and Section 5 outlines those areas likely to be significantly affected. These characteristics and potential interactions have been informed by information contained within the SA baseline data (Section 5).
Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.	Section 5 of this document outlines key sustainability issues related to each SA topic. This includes sites designated pursuant to Directives 79/409/EEC and 92/43/EEC. Further information will also be available in the separate Habitat Regulations Assessment (HRA) Report .
The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation.	Section 4 and Appendix A outline relevant environmental protection objectives. The way that those environmental objectives have been taken into account has been through integrating them into the SA Framework.
The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage,	Section 7 sets out the significant effects of the Proposed Submission Version of the Local Plan and Section 6 discusses the significant effects of reasonable alternatives. Details of the nature of effects are provided within Appendix C. This includes indirect

<sup>4</sup> Please see Schedule 2 of the SEA regulations: *Information for Environmental Reports*.

**Table 5: Fulfilling the Requirements of the SEA regulations**

<b>What the regulations say<sup>4</sup></b>	<b>How this is addressed</b>
landscape and the interrelationship between the above factors. The identification of the above effects should consider secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects.	(secondary), cumulative (cumulative and synergistic), duration (short/medium/long term), permanent or temporary and negative or positive effects. Definitions are provided within Table 3 in Section 2.4.
The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	Section 9 sets out mitigation measures for significant negative (negative) effects and uncertain effects.
An outline of the reasons for selecting the alternatives dealt with	Section 6 outlines the reasons for selecting the alternatives dealt with.
A description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.	Section 2 outlines the methodology for all stages of the SA and Section 2.5 specifically describes any technical difficulties that were encountered.  Section 5 outlines data gaps.
A description of measures envisaged concerning monitoring.	Set out in Section 10 of this document.
A non-technical summary of the information provided under the above headings.	See separate non-technical summary.
The report must include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment.	The whole SA Report addresses this.
Consultation: Authorities with environmental responsibility, when deciding on the scope and level of detail of the information which must be included in the environmental report (Art. 5.4).	The Scoping Report was consulted on with key stakeholders <sup>5</sup> , adjoining boroughs and the public for a five week period from 24 <sup>th</sup> July to 29 <sup>th</sup> August 2017.
Authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme.	This SA report will be consulted on between 26 <sup>th</sup> October and 14 <sup>th</sup> December 2020 and will amended following consultation where appropriate.
EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country.	Section 7 presents the potential significant effects of the Proposed Submission Local Plan (LP1). The assessment has not identified any potential effects on other EU member states.

<sup>5</sup> Environment Agency, Natural England, Historic England are the SEA statutory consultees.

**Table 5: Fulfilling the Requirements of the SEA regulations**

<b>What the regulations say<sup>4</sup></b>	<b>How this is addressed</b>
<p>Taking the environmental report and the results of the consultations into account in decision-making (Art. 8).</p> <p>Provision of information on the decision:</p> <p>When the plan or programme is adopted, the public and any countries consulted under Art.7 must be informed and the following made available to those so informed:</p> <ul style="list-style-type: none"> <li>The plan or programme as adopted.</li> <li>A statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report of Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Art. 7 have been taken into account in accordance with Art. 8, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with.</li> <li>The measures decided concerning monitoring.</li> </ul>	<p>This will be set out in the SA Adoption Statement.</p>
<p>Monitoring of the significant environmental effects of the plan's or programme's implementation.</p>	<p>The proposed monitoring arrangements are discussed in Section 10.</p>



## 3 The content of the Waltham Forest Local Plan

A new Local Plan is needed to support the Council's aspirations for growth, including significant new housing and sustained economic growth, to provide jobs for local people and increase the supply of housing, including affordable units as well as delivering infrastructure.

A new Local Plan is also needed to address changes as a result of new legislation including the Localism Act (2011) and new national planning policy in the form of the National Planning Policy Framework (NPPF). The Proposed Submission Version of the Local Plan will therefore set out how the borough will grow and develop in the future and is being delivered in stages.

The London Plan is the overarching spatial development strategy for London which provides the strategic, London-wide context within which all London Boroughs must set their detailed local planning policies.

Prior to the preparation of the Proposed Submission version of the Local Plan, two consultation stages have been undertaken. This included a Direction of Travel consultation in November – December 2017 undertaken at the Regulation 18 stage and the Draft Local Plan consultation undertaken in July – September 2019 introduced as an additional stage prior the preparation of this document at the Regulation 19 stage of the Local Plan preparation process. The content of the Proposed Submission version of the Local Plan is based is built on the requirements of national planning policy, the Council's evidence base and outcome of the previous consultations. The Council is currently finalising its evidence base to support the new plan and this Sustainability Appraisal Report will accompany the Proposed Submission Local Plan as part of the Regulation 19 consultation.

### 3.1 Description of the Plan

The SEA Regulations require information on:

*"An outline of the contents and main objectives of the plan or programme."* (Schedule 2, Paragraph 1).

As stated in Section 1 the Proposed Submission version of the Local Plan will set out the Council's planning policy framework for the borough. It sets out the level of growth which needs to be planned for in Waltham Forest for the next 15 years and identifies where that growth should be located and how it should be delivered. The policies set out in the Plan will be used to determine planning applications in Waltham Forest.

The Local Plan covers a range of matters including the number of new homes, and employment provision needed and where they should be located. It also sets out policies for the protection and enhancement of the natural and historic environment, the provision of supporting infrastructure for growth and other policies to manage change in local areas including town centres and the borough generally.



The Local Plan is being produced in two parts. This Proposed Submission Plan is the overarching strategic policy document. It represents Part 1 of the Council's Local Plan with a single Local Plan and will be complemented by a Site Allocations DPD representing Part 2 of the Local Plan. The Local Plan will also be supported by a series of Supplementary Planning Documents, Neighbourhood Plans (as may be prepared) and other guidance including masterplans and planning briefs.

This version of the Local Plan (Proposed Submission) has been prepared in accordance with Regulation 19 of the Town and Country Planning (Local Development) (England) Regulations 2012. At this stage of the plan preparation process, the Council is required to consult on the final version of the Plan as considered ready for independent examination by a Planning Inspector appointed by the Secretary of State.

Once adopted, the 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).

## 3.2 Plan Vision and Objectives

The Local Plan Part 1 (Regulation 19) sets out the vision and strategic priorities for development of the borough over the next 15 years. These are reproduced in Boxes 3.1-3.3 below:

### **Box 3.1: Walthamstow Local Plan Six Golden Threads**

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.

#### **Six 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
- Promoting the economy to improve the life chances for all residents, students and workers
- Protect and enhance the natural environment
- Ensuring land optimisation and driving investment

### **Box 3.2: Walthamstow Local Plan Vision**

#### **Waltham Forest in 2035**

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

#### **Liveable Waltham Forest**

Waltham Forest's vibrant network of distinctive and thriving town centres will be cultural community hubs, bringing the city to the suburbs and supporting creative, healthy and active lifestyles. 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.

#### **Box 3.3: Walthamstow Local Plan Strategic Objectives**

There are 13 strategic objectives that will deliver the vision for Waltham Forest by 2035, these are:

1. Ensure a significant increase in the supply, choice and mix of high-quality new homes, in particular delivering genuinely affordable homes to enable and encourage residents to stay in the Borough and strengthen communities.
2. Grow, promote and diversify Waltham Forest's economy, including its dynamic, cultural, creative and digital sectors and its role in the Upper Lee Valley and wider UK Innovation Corridor, by both supporting and nurturing indigenous growth as well as attracting inward investment.
3. Improve life chances by improving job opportunities, upskilling residents and providing access to new skills 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. Protect and enhance biodiversity and the natural habitat areas within the borough and beyond, working in partnership with duty to co-operate partners.
13. Waltham Forest builds its resilience through addressing sustainability, efficient waste management and the effects of climate change through all stages in the development process.

### 3.3 Overview of the Plan Area

Waltham Forest is an outer London Borough in the North East of London and is one of the greenest Boroughs in London. It is also one of the most diverse areas in the country with 48 per cent of residents from a minority ethnic background and is relatively small at approximately 3,880 hectares (ha). The Local Plan area is shown in Figure 2.

The North Circular Road (A406) divides the Borough into two main areas. The London Borough of Waltham Forest was created in 1965 by bringing together the areas of Chingford, Walthamstow and Leyton. These roughly align with the geographic areas of the borough identified in the Proposed Submission Local Plan: South (Bakers Arms, Lea Bridge, Leyton, Leytonstone, Whipps Cross); Central (Blackhorse Lane, Forest Road Corridor, St James' Quarter, Walthamstow, Wood Street); and North (Chingford, Chingford Mount, Highams Park, North Circular Corridor, and Sewardstone Road).

The Borough is a collection of neighbourhoods built up around busy high streets and stations, areas of industry and a total of 1205ha of open space, parks and playing fields. The Green Belt in the borough is part of the Metropolitan Green Belt which surrounds London.

The Lee Valley Special Protection Area (SPA) and RAMSAR site (and Regional Park) and Epping Forest Special Area of Conservation (SAC) define its western and eastern boundaries and it sits alongside the Queen Elizabeth Olympic Park and the Stratford City development. As an area it provides a link between two major regeneration areas: The Thames Gateway and the London – Stansted – Cambridge – Peterborough corridor.

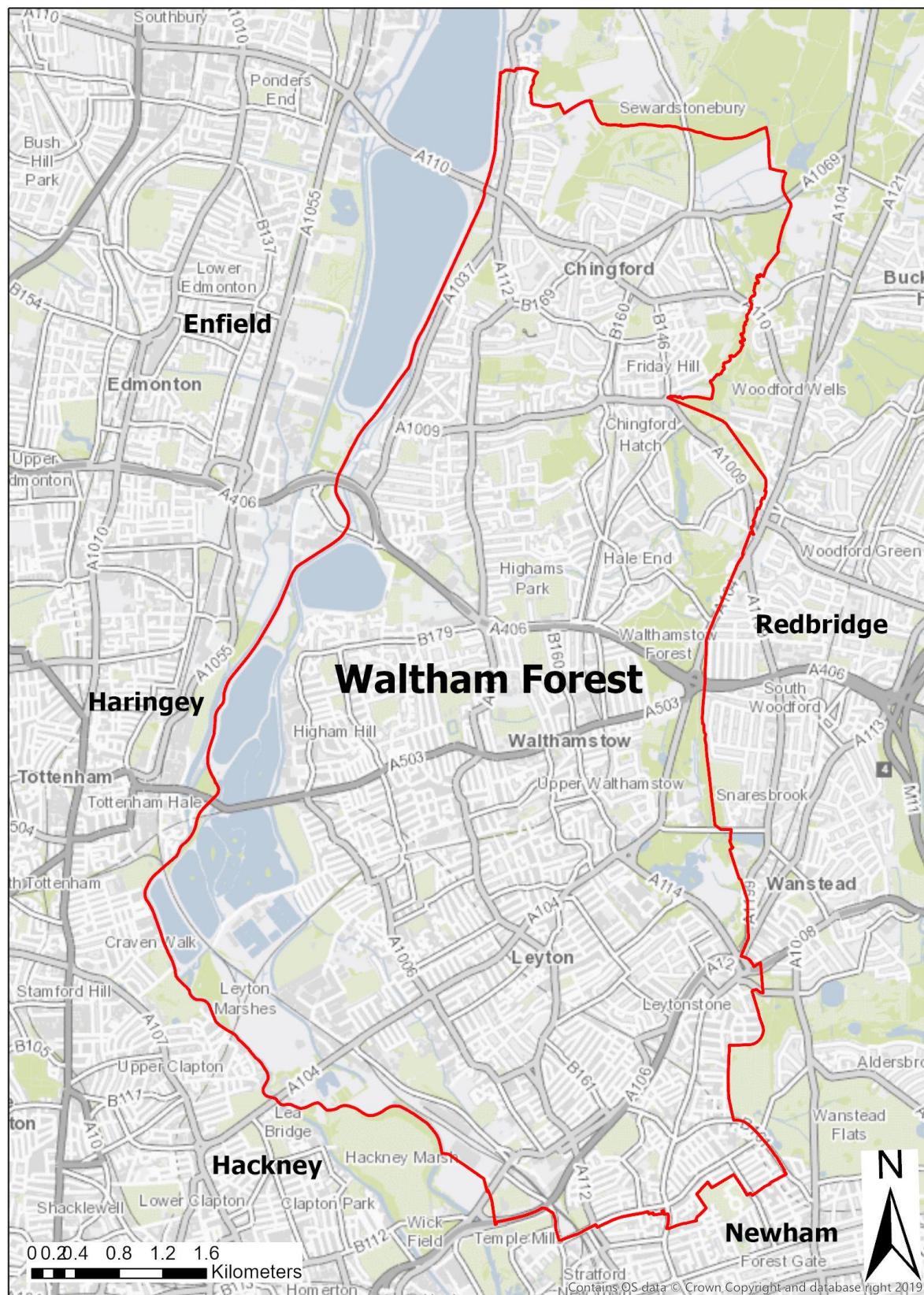


Figure 2: Waltham Forest Local Plan Boundary shown in red

## 4 Review of Other Programmes and Plans

### 4.1 Introduction

The policy context in which the Local Plan is being prepared can best be understood through a review of related Policies, Plans and Programmes (PPP). The SEA Regulations require information on:

- *"An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes."* (Schedule 2, Paragraph 1); and
- *"The environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation."* (Schedule 2, Paragraph 5)

The review process ensures that the Local Plan complies with existing PPP at international, national and regional levels of governance and also reinforces and supports local plans and strategies. The process entails identifying and reviewing those PPP and environmental protection objectives that are directly relevant to both the Local Plan and the SA.

For practical reasons the scoping task of identifying related plans and programmes cannot yield an exhaustive or definitive list of legislative/non-legislative documents. The review has been focussed to ensure that only policies that are current and of direct relevance to the Local Plan are reviewed. A detailed outline of the policy documents, the objectives and the targets reviewed is set out in Appendix A. Table 6 outlines the key messages of the PPP.

The completed review of policies, plans and programmes provides the context for the SA and helps to inform an SA Framework of objectives and sub-objectives which will guide the subsequent appraisal process. The review of PPP was updated between January and August 2020.

### 4.2 PPP Review - Summary of Key Messages

Table 6 sets out the key messages drawn from the review of PPP. The messages presented in Table 6 are reflected within the detailed SA Framework which can be found in Table 2.

Table 6: Key messages from the PPP review

SA Topic	Key Messages from Review
Population	<ul style="list-style-type: none"><li>• To create mixed and well balanced communities, which are well integrated and provide the conditions needed for all to live and work in harmony.</li><li>• To create safe and accessible environments and developments.</li><li>• To provide high quality spaces for the community, and prevent the loss of existing facilities.</li><li>• To create a Borough with the infrastructure and facilities which are capable of meeting current and future population needs, sustaining and improving services.</li></ul>

SA Topic	Key Messages from Review
	<ul style="list-style-type: none"> <li>• Improve quality of life for all.</li> <li>• Promote volunteering and other local activities for elderly people.</li> <li>• There is a need to ensure there is adequate older persons' accommodation-supply has not previously met demand.</li> <li>• Culture, arts and sport are important to communities within Waltham Forest.</li> <li>• There is a need to promote and protect these activities, increasing participation.</li> </ul>
Human Health	<ul style="list-style-type: none"> <li>• Awareness of mental health, facilities to support those experiencing poor mental health and promoting ways of dealing with mental health all need to be promoted within the Borough.</li> <li>• Mental wellbeing needs to be monitored across the Borough.</li> <li>• Support for young people and families experiencing poor mental health needs to be promoted and provided for all.</li> <li>• Children and young adults need to be kept healthy and safe, ensuring they have dignity and choice in their lives.</li> <li>• Access to high quality open spaces and opportunities for sports needs to be maintained in line with population increases in order to support the physical and mental health of the community.</li> <li>• Fast food outlets need to be restricted within 400m of schools, youth facilities and parks, in order to help curb the proportion of children within the Borough who are obese or overweight.</li> <li>• Ensure that all have long, healthy and happy lives.</li> <li>• Tackle issues particularly prevalent in minority ethnic groups, such as diabetes, dementia and obesity.</li> <li>• Reduce inequalities in health across Waltham Forest.</li> <li>• Increase healthy life expectancy and reduce differences in life expectancy.</li> </ul>
Economy	<ul style="list-style-type: none"> <li>• Support and grow an economy for residents to live and work within the Borough.</li> <li>• Support small businesses.</li> <li>• Support the sustainable growth and expansion of all types of business and enterprise.</li> </ul>
Employment and Skills	<ul style="list-style-type: none"> <li>• Create flexible jobs, which are secure for those most in need.</li> <li>• Create workspaces which meet the needs of businesses within the Borough.</li> <li>• Ensure that all residents have access to training and skills development, to enable them to gain high quality employment.</li> <li>• Address inequalities in employment across the Borough.</li> <li>• Ensure young people have access to information on career and training opportunities.</li> <li>• Support those with lower skills and wages by providing training to increase their skill levels.</li> </ul>
Transport	<ul style="list-style-type: none"> <li>• Work towards a zero emission Borough, by decreasing the use of private cars and increasing sustainable transport use.</li> <li>• Promote walking, cycling and public transport and the associated health benefits.</li> <li>• Manage patterns of development to ensure that walk, cycling and public transport are fully utilised.</li> <li>• Increase the efficiency of transport.</li> <li>• Reduce road emissions and noise.</li> <li>• There is a need to ensure that, where development occurs, there is adequate public and sustainable transport options available.</li> <li>• Improve the quality and quantity of public transport.</li> <li>• Increase the availability of secure bicycle parking and make cycling safer.</li> </ul>
Crime and Safety	<ul style="list-style-type: none"> <li>• Ensure all feel safe within Waltham Forest, especially those who are residents.</li> </ul>

SA Topic	Key Messages from Review
	<ul style="list-style-type: none"> <li>• Reduce incidents of anti-social behaviour, hate crime and intolerance and support victims.</li> <li>• Reduce the number of weapons on the streets and work to reduce knife crime.</li> <li>• Increase community engagement.</li> <li>• Provide support an education to local areas to tackle gang and youth violence problems.</li> <li>• Ensure there is early prevention of crime and pathways out of crime are made available to young people.</li> <li>• Improve support for young offenders.</li> </ul>
Housing	<ul style="list-style-type: none"> <li>• Plan for a mix of housing based on current and future demographic needs.</li> <li>• Identify the size and tenure of housing required in locations around the Borough, and ensure that future development is tailored to these needs.</li> <li>• There is a need for more homes, of which 50% should be affordable.</li> <li>• Create mixed and inclusive communities, including those with specialist housing.</li> <li>• Ensure housing is of high quality.</li> <li>• Homelessness needs to be tackled, particularly those who are rough sleepers.</li> <li>• The composition of households is undergoing changes, which will need to be reflected in the development of future accommodation.</li> <li>• A higher proportion of homes adapted for elderly people is likely to be required, as the demographics of the population continue to shift towards those over 65.</li> </ul>
Townscape and Heritage	<ul style="list-style-type: none"> <li>• Conserve heritage assets in a manner appropriate to their significance.</li> <li>• The connection between people and places they live in needs to be considered in future development, allowing integration of new developments into the existing built and historic environment.</li> <li>• Release land, where possible, for housing development.</li> <li>• Identify, record and protect (where appropriate) the archaeology and heritage assets of development sites.</li> <li>• Restoration of heritage assets is encouraged to give new vitality and use to otherwise vulnerable buildings, although consideration and protection of these assets will need to be carefully managed.</li> <li>• Promote the Borough's history and heritage as part of the culture of Waltham Forest.</li> <li>• All should be able to participate in the conservation and appreciation of heritage assets, and understanding of the significance of key assets should be promoted.</li> </ul>
Climate	<ul style="list-style-type: none"> <li>• There is a need to decrease greenhouse gas emissions from all anthropogenic sources.</li> <li>• A shift to 'cleaner' renewable energy sources is to be encouraged across the entire Borough.</li> <li>• Existing homes will need to increase in energy efficiency, and new homes will need to be energy efficient. Public buildings will also need to be retrofitted to increase energy efficiencies.</li> <li>• Adaptation to the effects of climate change will be required, including flooding and drought.</li> <li>• Future land use changes should not impact the ability of the Borough to react to future climate change induced conditions.</li> <li>• Long term resilience of homes, businesses and infrastructure should be increased.</li> <li>• Low carbon heat networks, which use decentralised energy sources are to be increased across London.</li> </ul>
Air Quality	<ul style="list-style-type: none"> <li>• Improving air quality is a priority.</li> <li>• Reduce emissions from transport and homes.</li> </ul>

SA Topic	Key Messages from Review
	<ul style="list-style-type: none"> <li>• Go beyond legal requirements to protect human health and minimise inequalities</li> <li>• The Low Emission Zone has been introduced, with the expansion of the Ultra Low Emission Zone expected in 2021.</li> <li>• Communities will need to be supported to reduce exposure to poor air quality</li> <li>• Reduce inequalities in air quality.</li> <li>• Reduce the exposure of young children to poor air quality surrounding schools, nurseries and other educational establishments.</li> <li>• Promote sustainable design and construction to reduce emissions from the demolition and construction of buildings.</li> <li>• Monitor air pollution and reduce in line with agreed targets.</li> </ul>
Soil and Geology	<ul style="list-style-type: none"> <li>• Protect and enhance valued landscapes and soils, preventing degradation.</li> <li>• Identify and remediate contaminated land.</li> <li>• Prevent soil pollution during construction and development.</li> </ul>
Water	<ul style="list-style-type: none"> <li>• Development in areas at risk of flooding should be avoided.</li> <li>• Development in one location should not affect flooding elsewhere.</li> <li>• Flood risks from all sources will need to be managed.</li> <li>• Water quality should be increased where possible.</li> <li>• The demand for water is likely to exceed current water supply if the population continues to increase.</li> <li>• Awareness of flooding risk management measures will need to be increased amongst residents and businesses.</li> <li>• There should be no deterioration in the health and quality of existing water bodies and development should improve the status of waterbodies to achieve ‘Good Overall Status in accordance with the Water Framework Directive’.</li> <li>• Water pollution should be minimised and reversed.</li> <li>• Entry of pollutants to water needs to be restricted.</li> </ul>
Biodiversity	<ul style="list-style-type: none"> <li>• Impacts of development on biodiversity should be minimised.</li> <li>• Net gains should be provided where possible.</li> <li>• The benefits of wider ecosystem services need to be recognised,</li> <li>• Ecological networks need to be developed to create more robust ecosystems.</li> <li>• Green infrastructure and natural capital need to be recognised and protected.</li> <li>• Terrestrial and freshwater sites should be restored.</li> <li>• Woodland should be increased.</li> <li>• Invasive non-native species should be prevented from entering the Borough, and those already established should be eradicated.</li> <li>• Trees and woodlands should be enhanced and woodland protected.</li> <li>• Wildlife and habitats, particularly those of international, national and regional importance, should be protected and enhanced within Waltham Forest.</li> <li>• Seek opportunities to increase the area and number of priority and locally important habitats.</li> <li>• Help people to connect with nature and use open spaces by ensuring they are accessible to all.</li> <li>• Maintain existing ecological networks and create buffer zones around high quality habitats.</li> </ul>
Landscape	<ul style="list-style-type: none"> <li>• There is a need to map existing open spaces within the Borough, depicting current land use.</li> <li>• The quality, quantity and accessibility of open spaces should be assessed.</li> <li>• Areas of need and inequalities in open space should be identified and addressed.</li> <li>• Protect Green Belt and Metropolitan Open Land.</li> </ul>

SA Topic	Key Messages from Review
	<ul style="list-style-type: none"> <li>• Promote or reinforce local distinctiveness.</li> <li>• Establish a strong sense of place, using streetscapes and buildings to create attractive, functional places to live, work and visit.</li> <li>• Create safe and accessible landscapes to help tackle the fear of crime and increase quality of life;</li> <li>• Ensure the built environment is visually attractive.</li> <li>• Protect Lee Valley Park from development which would not have a positive effect on the Park, including those outside of the Park boundaries.</li> </ul>
Waste	<ul style="list-style-type: none"> <li>• Work as part of the North London Waste Plan to manage and process as much waste as possible within the local area.</li> <li>• Eliminate food waste sent to landfill.</li> <li>• Eliminate avoidable waste of all kinds.</li> <li>• Increase the proportion of waste recycled, reused or composted.</li> <li>• Manage waste without endangering health or the environment (including water, air, soil plants and animals).</li> <li>• Avoid nuisance from waste noise or odours.</li> <li>• Follow the waste hierarchy (Prevent waste, reuse, recycle, other recovery methods, dispose).</li> </ul>



## 5 Summary of Baseline Data

The detailed baseline is contained within Appendix B. This section outlines a summary of the information contained within this appendix, presented by SA topic. The baseline data in this section and in Appendix B was updated between January and August 2020.

### 5.1 Population

#### 5.1.1 Introduction

The population of Waltham Forest in 2019 was estimated as 286,775<sup>6</sup>. Median age was 34.9 compared to the national average of 40. The Borough is one of the most diverse areas in the country, with 48% of residents from a minority ethnic background<sup>7</sup>.

#### 5.1.2 Likely Future Conditions

The population of Waltham Forest is expected to continue to increase and at a faster rate than previously predicted. The current trend of growth of all ethnic groups is expected to continue.<sup>8</sup> The revised ONS subnational population estimates put Waltham Forest in the top five local authorities in the country for the largest positive percentage difference between the actual and predicted population estimates<sup>9</sup>. The population of Waltham Forest in 2011 was 12.5% higher than previously predicted. The overall increase in population between 2016 and 2021 is now projected to be around 16,700, a 6% increase<sup>10</sup>.

This growth in population is likely to cause an increase in demand for housing, services and infrastructure. There will also be a continuing need to provide inclusive services in order to meet the needs of all residents. By 2020 the fastest growing age group is expected to be the over 50s, which may well put an additional strain on services, particularly healthcare.

#### 5.1.3 Sustainability Issues

The following sustainability issues for the Local Plan have been identified:

- As the population continues to increase so does the demand for housing, infrastructure, facilities and employment;
- The population density within the Borough exceeds both the London and the national averages;
- There is a need to create high quality places to live, work and recreate that are mixed and well-balanced in terms of tenure and income;

<sup>6</sup> Greater London Authority (GLA) London Data Store, 2018 round population projections, <https://data.london.gov.uk/dataset/projections> Accessed on: 08/01/2020

<sup>7</sup> Waltham Forest, Statistics about the Borough, <https://www.walthamforest.gov.uk/content/statistics-about-borough> Accessed on: 08/01/2020

<sup>8</sup> GLA ethnic demographic projections.

<sup>9</sup> ONS Population Estimates for England and Wales, Mid-2002 to Mid-2010 Revised (Subnational), 30 April 2013

<sup>10</sup> GLA 2015 round population projections

- Adequate support and facilities for older residents, including independent living, has been noted in particular to be needed;
- There is a need to build on the Borough's arts, culture and sport strengths across the Borough's diverse and changing population;
- There is a need to provide inclusive services; promote equal opportunities; oppose discrimination, intolerance and disadvantage through reducing inequalities and promoting community cohesion; and
- There is a need to reduce the number of older people who feel socially isolated, by getting them actively participating in community life.

#### 5.1.4 Data Gaps

Population estimates which are based on 2011 census data, are now almost a decade old. More recent data regarding populations is therefore expected to be available following the 2021 census. Similarly, more accurate Greater London Authority population estimates are due to be updated in 2020, but these were not available at the time of compiling the baseline data.

## 5.2 Human Health

### 5.2.1 Introduction

The World Health Organisation define health as 'a state of complete physical, mental and social well-being and not merely the absence of disease or infirmity'<sup>11</sup>. In 2015 Waltham Forest was in the top 10% of most deprived Boroughs in England. The Indices of Multiple Deprivation (IMD) is a qualitative study which looks at relative deprivation for small areas, using 37 key indicators. In terms of the overall measure of multiple deprivation, Waltham Forest is ranked as the 35<sup>th</sup> most deprived among the 326 local authorities in England<sup>12</sup>. This is an improvement from 2010 where it was ranked 15<sup>th</sup> but it represents an overall decline from 47<sup>th</sup> in 2004<sup>13</sup>. Out of 33 London Boroughs, Waltham Forest is 6<sup>th</sup> most deprived after neighbouring Boroughs of Hackney, Newham and Haringey as well a Tower Hamlets and Islington<sup>14</sup>.

#### Likely Future Conditions

As the population of Waltham Forest ages, the demand for health and social care needs will increase. By 2031, 42% of all people aged over 50 are projected to be from a minority ethnic background, which are at a greater risk of developing cardiovascular disease compared to the general population<sup>15</sup>. People aged 60 and over living with a life limiting condition is projected to rise by almost 30% by 2030<sup>16</sup>.

Life expectancy is on the rise and infant mortality has dropped below the national average. However, there are still substantial disparities in health across the Borough. In some of the most

<sup>11</sup> World Health Organisation (1948) Preamble to the Constitution of the World Health Organisation

<sup>12</sup> Waltham Forest, Statistics about the Borough: <https://www.walthamforest.gov.uk/content/statistics-about-borough>

<sup>13</sup> Age UK Waltham Forest Profile: Deprivation in Waltham Forest: 08/01/2013

<sup>14</sup> Age UK Waltham Forest Profile: Deprivation in Waltham Forest: 08/01/2013

<sup>15</sup> Waltham Forest Joint Strategic Needs Assessment 2014/2015

<sup>16</sup> Age UK Waltham Forest Profile: Deprivation in Waltham Forest, 08/01/2013

deprived areas, life expectancy is 5.3 years lower for men and 5.5 years lower for women than in the least deprived areas. This gap may well widen over time if levels of deprivation, overcrowding and poverty continue to rise. This is already being seen with TB, which is predominantly concentrated around the Borough's most deprived wards.

Levels of smoking are much higher compared to London and nationally, and is the leading cause of death in the Borough. This has led to smoking attributable hospital admissions being one of the highest in the country.

Mental illness is expected to increase particularly amongst the over 65s. Without more facilities and services, ongoing mental health issues may become more serious and lead to a rise in hospital admissions. If contributing factors such as unemployment and poverty are not addressed this could well lead to a further rise in mental illness.

### 5.2.2 Sustainability Issues

The following sustainability issues have been identified:

- Currently a large proportion of the population are aged over 50 and this is projected to rise over the next 20 years (+26% rise by 2021<sup>17</sup>);
- There are inequalities in health and life expectancy between ethnic groups;
- Disparities between wards, particularly between the north and south of the Borough;
- There is a need to improve life expectancies through promoting healthy lifestyles for all ages;
- Need to ensure adequate access to green spaces and recreational facilities to promote active and healthy lifestyles;
- Promote high quality housing with a range of tenures to reduce health issues which arise from poor quality accommodation;
- Need to increase recognition of the growing evidence of a relationship between physical and mental health;
- Need to increase levels of active travel throughout the borough in order to increase physical activity levels and tackle poor air quality;
- Childhood obesity rates are higher within Waltham Forest than both regionally and nationally;
- TB remains a disease which is of high prevalence within the Borough; and
- Need to ensure that hospitals have fit for purpose facilities (i.e. less converted houses) that meet the needs of patients.

### 5.2.3 Data Gaps

Some health data, such as the number of hospital admissions, has come from the 2011 Census. This data is therefore now almost a decade old, and further updates will not be available until after the 2021 Census. The production of an updated Healthy Weight Strategy post 2020 and a

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<sup>17</sup> GLA, 2015 Population projections

Joint Strategic Needs Assessment is currently underway, but neither document was available for use in the preparation of this report.

An open space strategy and a cultural infrastructure delivery plan are currently being prepared for Waltham Forest and were not available at the time of writing this report. When they are available, the findings will be incorporated into the SA.

## 5.3 Economy

### 5.3.1 Introduction

The number of new business registrations grew by 98% between 2011-2018 compared to the London average of 58.5%<sup>18</sup>. The top five sectors which have seen the greatest amount of growth are: digital and creative (40%); construction (35%); professional and urban services (30%); manufacturing (35%); and retail (10%).<sup>19</sup> Despite this growth, the Borough is ranked 7<sup>th</sup> in London for unemployment. Compared to the rest of London, Waltham Forest has a comparatively small and lower value economy.

### 5.3.2 Likely Future Conditions

Forecast levels of job growth in Waltham Forest are for 8,100 additional jobs from 2018 to 2035<sup>20</sup>. The sector mix of the local economy may be beginning to shift from traditional sectors such as industry, manufacturing and retail to creative, digital and technical sectors. If productivity increases to the London level (+11%)<sup>21</sup> it will allow the Borough's businesses to better compete with the wider economy.

There may be increasing demands on current industrial areas due to population growth and demand for housing.

Please note that there is a data gap in relation to the impact of the Covid-19 crisis on the economy of the borough and this creates some uncertainty about likely future conditions.

### 5.3.3 Sustainability Issues

The following sustainability issues have been identified:

- Ensure that ongoing business growth becomes a driver of productivity and fairer wages (e.g. encouraging the London Living Wage), in order to create an increase in the overall prosperity of the Waltham Forest Borough;
- Continue to support the Upper Lee Valley Development Opportunity Area and celebrate its industrial heritage;

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<sup>18</sup> ONS – Business Demographics and Survival Rates, by Borough, 2018

<sup>19</sup> Waltham Forest Economic Growth Strategy, 2016-2020

<sup>20</sup> Employment Land Study, 2019

<sup>21</sup> Waltham Forest Economic Growth Strategy, 2016-2020

- Support is required for the creation of the Creative Enterprise Zone around Blackhorse Lane;
- Support development of successful neighbourhoods;
- Need to ensure that growth supports the delivery of vital infrastructure and new facilities across the Borough;
- Further action is needed in order to support and promote retail, business, cultural, leisure and residential investment in town centres;
- There are likely to be ongoing pressures on industrial sites, need to maintain industrial uses and promote strong local base of small businesses;
- Need to provide additional workspaces and promote denser, mixed use development with no net loss of business floor space.

#### 5.3.4 Data Gaps

Data is not yet available on the impact of the Covid-19 crisis on the economy of the borough. Once available, this will also be incorporated into the SA.

### 5.4 Employment and Skills

#### 5.4.1 Introduction

The number of jobs in Waltham Forest grew by 30% (the highest growth rate in London) between 2009 to 2014 compared to just 14% across London. In 2018, there were estimated to be 72,000 jobs in Waltham Forest.<sup>22</sup>

The percentage of Waltham Forest residents who are economically active (74.8%) is higher than the London average (78.1%), but lower than the national average (78.9%).<sup>23</sup> Self-employment (14.6%) is also higher than the national and London average at 10.8% and 13.1% respectively. Waltham Forest is very much a small business economy with 76% of all companies employing four people or less and 94% employing 20 or less. Despite this, 220 larger businesses account for 55% of the all jobs in the Borough<sup>24</sup>.

#### 5.4.2 Likely Future Conditions

Forecast levels of job growth in the borough are for an additional 8,100 jobs across all sectors over the plan period. Ongoing support of the 'Steps into Work' campaign by the Council, which focuses on engaging those who are economically inactive / or are long term unemployed should help to continue this downward trend of unemployment.. However, the situation regarding funding for this EU project surrounding Brexit is currently unclear. Without more support, the disparities in employment between wards may continue to widen.

Despite growing levels of qualification, Waltham Forest remains one of the worst paid areas of London; however, this gap has been narrowing. With new business interest in the area,

<sup>22</sup> Nomis <https://www.nomisweb.co.uk/reports/lmp/la/1946157278/report.aspx#tabjobs>

<sup>23</sup> Nomis, Labour Market Profile - Waltham Forest, 2019

<sup>24</sup> Waltham Forest Economic Growth Strategy, 2016-2020

particularly in the technology, digital and creative sectors, there may be a new demand for higher educated employees, which could drive up average salaries.

Please note that there is a data gap in relation to the impact of the Covid-19 crisis on employment and this creates some uncertainty about likely future conditions.

### 5.4.3 Sustainability Issues

The following sustainability issues have been identified:

- Investment is needed so that local people have the skills and ability to seize local growth opportunities and they are able to access and progress into high-quality, better paid employment in the Borough;
- There are large inequalities in employment and skill levels between wards within the Borough. Need to ensure that regeneration is inclusive;
- Lower than average salaries could affect the Borough's ability to attract inward investment;
- Need to ensure that all residents have access to training and skills development to enable them to access and progress into high quality employment;
- Skills development in growth areas is also needed both for those who are currently unemployed or underemployed;
- There is a need to create fair employment and good work for all;
- Encourage and promote flexible working arrangements for residents to support people when gaining skills and moving into employment;
- In work support is needed to ensure sustainment of jobs, professional development and progression into better paid, secure higher quality jobs; and
- Need to promote employment, training programmes and sector based initiatives in the growth of skills to support creative and digital industries, construction and facilities management, retail and hospitality, and finance and business services.

### 5.4.4 Data Gaps

An Economic Recovery Strategy for Waltham Forest is being prepared but was not available for use in the preparation of this report. The findings will be incorporated into the next iteration of the SA.

Data is not yet available on the impact of the Covid-19 crisis on employment. Once available, this will also be incorporated into the SA.

## 5.5 Transport

### 5.5.1 Introduction

Waltham Forest has good public transport linking to the centre of London as well as direct links to Stansted Airport, although these transport links are clustered to the south of the Borough.

The Borough has four underground stations (Leyton, Leytonstone Walthamstow Central and Blackhorse Lane) which are served by the Victoria and the Central lines. The Borough is also served by the two over ground services; the Gospel Oak to Barking (GOBLIN) Line and the Chingford to Liverpool Street Line, which forms a main commuter route to Central London. The Borough is also well served by buses, with 37 different routes.

Pre-Covid 19 pandemic the majority of people in the borough commuted using either a car or motorcycle, with the second most popular mode being walking. In total over a quarter (26%) used public transport on their daily commute; this is higher than the Outer London average of 22%, but less than the Greater London average of 29%. Car ownership is ranked 17th out of the London boroughs with an average of 0.8 cars per household<sup>25</sup>. Levels of car ownership vary across the borough with a clear north-south split; there are more households with cars in the north of the borough compared to the south.

Car ownership in the borough has fluctuated since 2010. The number of vehicles registered within Waltham Forest saw an annual rise between 2010 and 2016, when 546,552 vehicles were registered within the borough<sup>26</sup>. However, there has since been a decline in vehicle registrations, in 2018/19 and therefore the trend could be improving. This could in part be due to the implementation of the ‘Mini Holland’ project within the borough and increase in car free development.

Accessibility to public transport levels (PTAL) measures the density of public transport. It is a detailed and accurate measure of the accessibility of a location to the public transport network, which takes into account walk access time and service availability. Areas are graded between 0 and 6b, where a score of 0 is very poor access to public transport, and 6b is excellent access to public transport. Overall the borough is ranked 16<sup>th</sup> in London for accessibility to transport with a score of 3.6, this is slightly lower than the Greater London average of 3.8, but higher than the Outer London score of 3. The PTAL scores across the borough vary, with a distinct north-south divide. The wards of Leytonstone and Hoe Street have the best scores of 5.5 and 5.2 respectively. The wards with the least access to public transport are Valley and Endlebury, with a score of 2.4.

In 2013 Waltham Forest became successful in securing £30 million in funding from Transport for London and the Mayor of London for their pilot ‘Mini Holland’ project. The project aims to radically improve the borough’s cycling infrastructure and increase the number of people choosing to walk, cycle or use public transport, by adding new safer crossing points, more pedestrianised areas and segregated cycle lines. Over 22km of cycle tracks have been constructed, along with 400 secure cycle parking spaces<sup>27</sup>. Since the pilot scheme has been introduced, traffic levels in key roads such as Francis Road have fallen by 60%<sup>28</sup>.

### 5.5.2 Likely Future Conditions

Despite a high number of people in the Borough using public transport and good transport links, there is still a high dependency on the private car. Some areas, particularly around Walthamstow have seen improvements, and car ownership is beginning to stabilise. Currently 41% of journeys originating in Waltham Forest are made by car; with more improvements to cycling and

<sup>25</sup> GLA, London Borough Profiles, 2015

<sup>26</sup> GLA, London Borough Profiles, 2015

<sup>27</sup> Enjoy Waltham Forest Walking and Cycling Account 2017/18, November 2018

<sup>28</sup> Enjoy Waltham Forest Walking and Cycling Account 2017/18, Nov 2018



pedestrian infrastructure this may start to fall. In general, the south of the Borough has better access to public transport compared to the north; this disparity may increase further car ownership and private car journeys in the north.

However, electric vehicle use is increasing and there is a need to ensure that appropriate infrastructure, such as charging points, is provided. Increasing electric vehicle use will help to reduce air pollution from transport within the Borough.

### 5.5.3 Sustainability Issues

The following sustainability issues have been identified:

- Continual growth in car ownership will contribute to further air pollution, and associated impacts on climate, human health and biodiversity;
- Need to work towards improving air quality and reducing noise impacts from transport;
- There is a need to make public transport more accessible in some areas of the Borough;
- There is a need to promote walking and cycling (building on Enjoy Waltham Forest (“Mini Holland”) programmes) for local journeys in place of travel by private car. There should also be a focus on promoting public transport use instead of cars for medium and longer journeys;
- There is a need to reduce car parking spaces in order to discourage private car use and improve air quality;
- One in five journeys each weekday morning and afternoon involves trips to school, even though most journeys to schools are under a mile. There is a need to reduce school journeys by reducing Drop Off/Pick Up arrangements for new school developments, and encouraging sustainable, active travel amongst school pupils;
- There is a need to provide electric vehicle infrastructure, such as charging points;
- As the population grows, so does the need to change current infrastructure to meet the demands of all residents, whilst making it future proof;
- Need to provide public transport capacity and safeguard land for transport;
- Help to enhance London’s transport connectivity;
- Improvements to road safety are needed to reduce casualties; and
- Need to make cycle parking safer and easier to use.

### 5.5.4 Data Gaps

A Waltham Forest Infrastructure Delivery Plan and a Transport Study are being prepared alongside the Local Plan. Once available, they will form part of the Local Plan evidence base and any relevant information contained within the will be taken into account with the SA.

## 5.6 Crime and Safety

### 5.6.1 Introduction

Ensuring community safety is key for achieving a positive state of well-being among people within social and physical environments. It is as much about reducing and preventing crime, as it is to build strong and vibrant communities. This means the perception of safety is as important as measuring crime rates.

Between January 2019 and January 2020, 26,239 crimes were reported across the borough of Waltham Forest<sup>29</sup>. The top three crimes recorded in the Borough over this 12 month period were:

- Violence Against the Person (25%): This includes a range of offences, such as harassment, assault without injury, death by dangerous driving and murder;
- Theft (21%): Crimes including theft from a person or vehicle, shoplifting and making off without payment; and
- Vehicle crime (18%): Any crime in which vehicles are stolen or interfered with.

### 5.6.2 Likely Future Conditions

Overall the number of reported crimes in Waltham Forest increased by 4.5% between 2017 and 2019. This juxtaposed the London trend of a decrease in reported crimes by 4.2%. There has been a considerable rise homicide and drugs related crimes; without intervention this could worsen.

### 5.6.3 Sustainability Issues

The following sustainability issues were identified:

- There has been an increase in homicide and drugs related crimes;
- The percentage of residents in the Borough that are worried about crime remains higher than the London average;
- Need to provide safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life;
- Need to develop an approach to tackling crime, improving liveability and reducing anti-social behaviour; and
- There is no clear trend for crime across the Borough, however rates are highest in High Street ward.

### 5.6.4 Data Gaps

None identified.

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<sup>29</sup> Metropolitan Police Safer Neighbourhood Dashboard. <https://www.met.police.uk/sd/stats-and-data/met/crime-data-dashboard/> Accessed 21/02/2020.

## 5.7 Housing

### 5.7.1 Introduction

Waltham Forest is one of the fastest growing London Boroughs which is causing an increase in house prices<sup>30</sup>. Average house prices in Waltham Forest increased by 27% (for all property types) between June 2015 and June 2020 and are significantly higher than the average for England (an average price of £450,187 in Waltham Forest compared to £254,688 for England)<sup>31</sup>. However, average house prices in Waltham Forest remain lower than the average house prices across London but demonstrate convergence. The ratio of workplace-based earnings to house prices can be used to indicate affordability of house prices. Waltham Forest has a higher ratio than the average for London indicating that it is less affordable for the current residents<sup>32</sup>. These changes have led to an increase in the proportion of rented properties instead of owner-occupied properties and an increase in homelessness in the area. These trends are mirrored in London<sup>Error! Bookmark not defined.</sup>.

There is a significant difference between the northern and southern urban areas of the borough. The southern and central parts of the Borough are Victorian and Edwardian terraced houses. The northern section of the Borough generally has more open space and community facilities and the houses are built to higher specifications<sup>33</sup>.

Waltham Forest, in general, follows the London and national trends for housing size. There is a large number of small households which gradually decreases with household size. The borough has a slightly higher than average proportion of houses with more than two occupants which is likely to be caused by the high house prices which encourages private renting and house shares.

### 5.7.2 Likely Future Conditions

Over 50% of households in Waltham Forest are classed as small households, comprising one or two people and 13% of households are lone parents. There are also a high number of households likely to be constituted of students sharing houses. The average cost of dwellings in Waltham Forest has increased rapidly in the past few years and is still increasing faster than the average London prices. It is becoming increasingly difficult for those on lower incomes to purchase a property and it is unlikely that the current situation will change in the foreseeable future. To combat this, LBWF aims to build more affordable housing.

The number of households on the Housing Register is high and although there has been an apparent decrease in recent years, this does not mean that the Borough need for housing has reduced as within the same period the number of households in temporary accommodation has increased significantly.

<sup>30</sup> 'Building for the Future Delivering Housing for Everyone in Waltham Forest' LBWF 2015

<sup>31</sup> Land Registry <https://landregistry.data.gov.uk/>

<sup>32</sup> 'Median and Lower Quartile Ratio of House Prices to Workplace-Based Earnings' DCLG <https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoresidencebasedearningslowerquartileandmedian>

<sup>33</sup> Waltham Forest Housing Strategy 2008-2028

### 5.7.3 Sustainability Issues

The following sustainability problems have been identified:

- There is a disparity between the cost of housing and the amount that people are able to borrow to purchase a home, which means that many people are unable to access the property market;
- There is a shortfall in the provision of affordable housing to meet the requirements of those in housing need;
- there is a potential shortfall in the provision of family accommodation and there is overcrowding, primarily in the private rental sector;
- Homelessness is expected to increase;
- Need to offer greater quality, flexibility and choice to those who rent;
- Need to increase the supply of well-designed housing of all tenures; and
- Need to introduce more flexible approaches for affordable housing contributions to encourage open market and mixed tenure specialist older people's housing.

### 5.7.4 Data Gaps

Detailed housing tenure and the distribution of the population in different household types data is from the 2011 Census. This is due to be updated when data from the 2021 census is made available.

## 5.8 Townscape & Heritage

### 5.8.1 Introduction

The built environment is a term used to describe the man-made surroundings that provide the space where people can live, work and recreate. It encompasses spaces which have been created or modified by people such as parks, buildings and transport infrastructure. These areas are referred to as "townscapes".

UNESCO defines cultural heritage as the 'legacy of physical artefacts and intangible attributes of a group or society that are inherited from past generations, maintained in the present and bestowed for the benefit of future generations'<sup>34</sup>. Historic England defines a heritage asset as "A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Preserving cultural and built heritage can benefit communities by providing an essential educational resource, giving residents a sense of identity as well as contributing to the national and local economy.

Heritage assets include designated heritage assets and assets identified by the local planning authority (including local listing)<sup>35</sup>. Heritage assets include archaeology and non-designated assets. Waltham Forest has 136 statutory Listed Buildings of which 15 are listed on the Historic England Heritage at Risk Register. Of the entries on the Heritage at Risk Register, six are stated to be in very bad condition whilst

<sup>34</sup> UNESCO, Tangible Cultural Heritage <http://www.unesco.org/new/en/cairo/culture/tangible-cultural-heritage/>  
Accessed on: 19/05/2017

<sup>35</sup> Historic England website: <https://historicengland.org.uk/advice/hpg/hpr-definitions/h/536274/>

eight are stated to be in poor condition and one is in fair condition. The majority of these are showing slow signs of decay. However, St Peter in the Forest Church, St Mary's Churchyard, St Andrew's Church and St Margaret & Antioch Church, are stated to be at risk of immediate deterioration. Of the 14 listed, 12 have no solutions agreed or in place. House 698a on High Road and the Church of St Peter and St Paul have agreed solutions which are yet to be implemented.

In addition to the statutory listed buildings, LBWF has produced a list of local buildings which it considers to be of historical or cultural importance. The Council will seek to retain buildings included on its local list of buildings of architectural/historic interest and encourage their sympathetic maintenance and enhancement. There are also 14 Conservation Areas within the borough. The main purpose of Conservation Areas is to preserve or enhance areas of special historic or architectural interest and their settings and place added control on new developments.

Archaeological Priority Areas (APAs) are areas where there is significant known archaeological interest or potential for new discoveries. APAs are used to help protect archaeological remains that might be affected by development. There are 20 APAs in Waltham Forest.

### 5.8.2 Likely Future Conditions

Continual growth in the Borough and the increased demand for housing may well mean development could encroach on conservation areas and could negatively affect townscape and heritage assets. Action will be needed to continue to make progress in improving the condition of assets on the Heritage at Risk register.

### 5.8.3 Sustainability Issues

The following sustainability issues have been identified:

- A number of listed buildings are identified as being in poor condition and are have been included on Historic England's Heritage at Risk Register. Opportunities exist to improve the condition of some listed buildings through development;
- The borough contains 20 Archaeological Priority Areas where there is significant known archaeological interest or potential for new discoveries;
- Ensure that the Conservation Areas, Heritage Assets (including archaeology) and features are preserved or enhanced;
- New developments should respect the urban and historic context, improve townscape and leave a positive architectural legacy;
- Impacts of future development on the local historic environment need to be considered;
- Heritage assets should be managed to sustain their significance;
- Ensure that everyone is able to participate in understanding and sustaining their local historic environment; and
- Development could encroach on Conservation Areas and subsequently negatively affect townscape and heritage assets.

### 5.8.4 Data Gaps

Conservation Area Appraisals and Management Plans do not exist for all Conservation Areas within the Borough. The Borough's APA are out of date and lack appropriate descriptions and justifications. Historic England has recommended that the LBWFC liaise with GLAAS over updating and improving the Local Plan heritage evidence base and that the local Historic

Environment Record is consulted which is particularly relevant when site allocation options are considered. A study to update the Archaeological Priority Areas in Waltham Forest is underway at the time of writing and will be incorporated into the SA when available. The updated APA will also be incorporated into the Local Plan policies in order to ensure that development mitigates harm to archaeology through development.

A Cultural Infrastructure Plan is currently being prepared for Waltham Forest. When it is available, the findings will be incorporated into the SA.

## 5.9 Climate

### 5.9.1 Introduction

The UK has a strong policy commitment to responding to climate change, most recently evidenced through the ratification of the landmark “Paris Agreement”. This is based on a scientific consensus that human activity has resulted in the accumulation of so-called “greenhouse gasses” in the atmosphere and is causing climatic change.

The increase in global temperature is likely to continue unless greenhouse gas emissions are reduced. The impacts of climate change are expected to be warmer, wetter winters and hotter, drier summers. Sea levels are expected to rise and, together with an increase in rainfall, lead to more frequent flooding of rivers and the coastline. Extreme weather events such as storms or heat waves are likely to be more frequent.

These impacts are likely to have a number of indirect effects. Flooding may become more frequent and severe in vulnerable areas; there could be changes in the availability and quality of water resources, damage to native habitats and migration or extinction of native plants and animals. Infrastructure and buildings could be damaged more frequently by storms.

Emissions of carbon expressed as ‘per capita’ (per resident) allow a comparison across different areas. Per capita CO<sub>2</sub> emissions for Waltham Forest are significantly below those for the UK as a whole and are less than those for the Greater London area. a decrease in emissions from domestic and commercial/industrial sectors, but the transport sector has shown little change. The main driver of decreasing emissions is the shift in electricity generation to more renewable sources from fossil fuels<sup>36</sup>.

The Mayor of London is aiming to ensure that 25% of London’s energy supply is from decentralised energy and the GLA Heat Map has been developed to identify areas of opportunity for decentralised energy<sup>37</sup>. Figure 13.2 shows the south section of Waltham Forest with potential areas for decentralised energy highlighted in grey. The term decentralised energy refers to the generation of energy away from the main grid, close to the point of demand<sup>38</sup>. Two areas are currently being constructed at Blackhorse Lane and Wood Street.

<sup>36</sup> UK local authority and regional carbon dioxide emissions national statistics: 2005-2017

<sup>37</sup> GLA Heat Map, <https://maps.london.gov.uk/webmaps/heatmap/> Accessed on 13/01/2020

<sup>38</sup> The London Plan- Policy 5.5 Decentralised Energy Networks. <https://www.london.gov.uk/what-we-do/planning/london-plan/current-london-plan/london-plan-chapter-five-londons-response/poli-0> Accessed 24/02/2020

### 5.9.2 Likely Future Conditions

In the report 'A Summary of Climate Change Risks for London'<sup>39</sup>, the likely effects of climate change on London are discussed. The following climatic changes have been predicted in the 2080s based on the medium scenarios:

- Mean annual temperature +1.4 to + 5.7°C;
- Winter mean temperature is likely to increase by +3°C;
- Summer mean temperature is likely to increase by +3.9°C;
- Annual mean precipitation is unlikely to change;
- Winter rainfall +19%;
- Summer rainfall -23%;
- Mean sea level change +36 cm; and
- Likely occurrence of a dry summer (50% of normal summer rainfall) 10% compared to 1% with the present climate.

Given the reliance on the private car as the main mode of transport within the Borough, and lack of vehicles meeting emissions standards, and the requirement for additional residential development, it could be considered likely that greenhouse gas emissions will rise in the future. However, there is the potential for advances in technological solutions and changes in policy to begin to stabilise and reduce emissions over time. Local policy reducing car-based development could already be affecting this (i.e. the Mini-Holland project), as could the increasing use of electric vehicles. Despite this, the current estimates for temperature increases and changes to rainfall patterns are unlikely to alter significantly in the near future, given the timescales associated with climate change. This being the case, there will be an increasing need to implement climate change mitigation and adaptation measures in light of changing environmental conditions.

### 5.9.3 Sustainability Issues

The following sustainability problems have been identified:

- Reliance on the petrol or diesel-fuelled private car as the main mode of transport;
- Greenhouse gas emissions need to be stabilised and reduced over time;
- Need to provide electric vehicle infrastructure, such as charging points;
- Need to plan for and implement/facilitate climate change adaptation, in respect of rising temperatures, water scarcity and extreme weather events, particularly heavy rainfall/flooding;
- Need to continue to promote the construction of energy efficient buildings, and to support the installation of renewable and low or zero carbon technology;
- Need to plan and prepare for the expected impacts of unavoidable climate change by developing adaptation responses and building resilience;

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<sup>39</sup> 'A Summary of Climate Change Risks for London' Climate UK, 2012



- New developments need to minimise vulnerability and provide resilience to climate change;
- Need to work with communities to help tackle climate change;
- Help promote low carbon heat network; and
- Need to identify opportunities for growth of the low carbon economy in the Upper Lee Valley.

#### 5.9.4 Data Gaps

Further information about renewable and low carbon energy installations and their generation capacity within the Borough could be compiled if needed. This could include information for the borough on the Feed-in Tariff and the Renewable Heat Incentive. Data may also available for the PV installations on LBWF buildings.

### 5.10 Air Quality

#### 5.10.1 Introduction

The entire Borough has been declared an Air Quality Management Area (AQMA) as a result of high levels of NO<sub>2</sub> and PM<sub>10</sub>. The ongoing monitoring confirms that exceedances of the NO<sub>2</sub> annual and hourly objectives are exceeded on main roads. Road traffic emissions are currently the dominant source of NO<sub>2</sub>, hence this is where poor air quality standards are clustered. For PM<sub>10</sub> emissions, monitoring has demonstrated that Waltham Forest is within the legal limits, however, even low levels of emissions can be harmful and the Council are working to reduce consumption<sup>40</sup>.

The majority of Waltham Forest falls within the Transport for London Low Emission Zone (LEZ), which came into force on 4th February 2008. The LEZ applies to vehicles with potentially high emissions of pollutants of concern such as NO<sub>2</sub> and PM<sub>10</sub>, largely heavy vehicles with diesel engines. The vehicles affected at the outset were lorries, buses and coaches but it was extended in October 2010 to include heavier vans and minibuses. The scheme does not currently apply to cars, motorcycles and small vans (under 1.205 tonnes unladen weight)<sup>41</sup>.

Similarly, the Transport for London Ultra Low Emission Zone lies to the south of Waltham Forest. Introduced on 8<sup>th</sup> April 2019, this zone restricts vehicles which do not meet emissions standards for NO<sub>2</sub> and PM<sub>10</sub>, through a daily charge, with penalty charges for those who do not comply<sup>42</sup>. Although located outside of the Borough, this could affect journey planning of those travelling to and from Waltham Forest, who may cross into this zone.

The Council has adopted a number of measures to improve air quality including encouraging cycling and walking instead of using private cars, and by promoting a culture of cycling, such as that in the Netherlands. They have also adopted anti -idling legislation and are raising awareness

<sup>40</sup> London Borough of Waltham Forest Air Quality Action Plan, 2018-2023.

<sup>41</sup> Transport for London <https://tfl.gov.uk/> Accessed 13/01/2020

<sup>42</sup> Transport for London Ultra Low Emission Zone <https://tfl.gov.uk/modes/driving/ultra-low-emission-zone> Accessed 11/03/2020



of the impacts of leaving engines idling. The Council has been running community and business engagement projects to reduce pollutant contribution and exposure.

### 5.10.2 Likely Future Conditions

It is likely that air pollution will continue to be an issue within the Borough given its proximity to the strategic road network. The NO<sub>2</sub> emissions have remained consistent, despite the introduction of schemes to discourage the use of private vehicles. Despite this, since monitoring began in the late 90's, the PM<sub>10</sub> concentration levels have also remained relatively consistent.

With the introduction of the Low Emission Zone, which excludes polluting vehicles from entering London, air quality is expected to improve, although early indications are showing no significant change in levels of the pollutants of concern. A potential explanation for this is that the changes in vehicle technology are actually increasing emissions of NO<sub>2</sub> and it is increases in this source of primary NO<sub>2</sub> that is causing the exceedances at background monitoring locations. The introduction of an Ultra Low Emissions Zone in 2021 could help to improve air quality further. Other future conditions that may affect air quality are the increase in dispersed pollution sources such as commercial and residential boilers, diesel generators, Combined Heat and Power systems, energy networks, and use of biodiesel and biomass at commercial and residential sites<sup>43</sup>.

### 5.10.3 Sustainability Issues

The following sustainability problems have been identified:

- Need to help reduce pollution from road vehicles, buildings, industry and construction;
- Reliance on the petrol or diesel-fuelled private car as the main mode of transport;
- Air pollution from the strategic road network is an issue across the Borough and NO<sub>2</sub> emissions have remained constant, not decreasing as predicted;
- Increasing use of biofuels (biodiesel and biomass) will cause further air quality issues; and
- Need to improve efficacy of measures within the AQMA.

### 5.10.4 Data Gaps

None identified.

## 5.11 Soil and Geology

### 5.11.1 Introduction

Government policy promotes development on previously developed land rather than on greenfield land to make the most efficient use of a finite resource. Development within Waltham Forest is constrained by the designation of Green Belt and Metropolitan Open Land; all recent residential completions have taken place on previously developed land. Between 2004 and

<sup>43</sup> Waltham Forest Air Quality Website - <https://www.walthamforest.gov.uk/content/air-quality>

2019, the proportion of new residential development on Previously Developed Land within Waltham Forest was 100%<sup>44</sup>.

### 5.11.2 Likely Future Conditions

Although currently all new dwellings are being built on previously developed land over the past few years, it is unclear whether this trend is likely to continue in the future. Previously developed land could be considered to be a finite resource and many vacant or derelict sites within the Borough could already have been redeveloped.

### 5.11.3 Sustainability Issues

The following sustainability problems have been identified:

- There is finite availability of previously developed land for development; this may result in the use of greenfield land in the future.
- There is a need to protect soils and the important ecosystem services they provide – particularly during construction and development.
- There is a need to protect designated geological sites.

### 5.11.4 Data Gaps

No data on existing contaminated land was identified.

## 5.12 Water

### 5.12.1 Introduction

Water resources and the provision of water infrastructure are also becoming of increasing concern in many areas, in response to increases in population. 5.2 million people in England and Wales are deemed to be at risk of flooding<sup>45</sup>. As the population rises the number of those at risk of flooding may also rise. Waterways offer a beneficial asset within an urban environment offering recreational activities, areas of open space as well as providing attractive places to live. In spite of this waterways in England are becoming increasingly polluted. Waltham Forest is no exception to this, with many of its lakes and reservoirs being severely polluted.

The River Ching and the River Lee are the two principal rivers that flow through Waltham Forest. The borough also contains the Chingford and Walthamstow Reservoirs which together make up one of the largest expanses of open water in London.

The main source of flood risk in Waltham Forest is fluvial flooding associated with the Lower Lee and its associated diversion channels and tributaries. According to the London assembly in 2014, 2,510 properties were considered to be at high risk (1 in 30 per year) of flooding<sup>46</sup>. This was the highest of all the London Boroughs.

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<sup>44</sup> London Borough of Waltham Forest: Authority Monitoring Report- Housing 2017/18

<sup>45</sup> National Flood Forum, 2017

<sup>46</sup> London Assembly, '20 London Boroughs have homes at 'high risk' of flooding' <https://www.london.gov.uk/press-releases/assembly/flood-risk-homes> Accessed on 16/05/2017

The River Lee last experienced severe flooding in 1947 and since then it has been heavily altered and defended, with a flood relief channel being completed in 1976, in order to prevent a repeat of the 1947 flooding. The wide concrete channel re-joins the River Lee at the Hackney Marshes. Historic cases of flooding, identified in a Level 1 SFRA in 2018, can be seen in Figure 16.1. This shows that there is no clear pattern of flooding, hence flooding is a ubiquitous issue across the Borough<sup>47</sup>. Much of the western side of the Borough lies in Flood Zone 2, with some areas being classified as Flood Zone 3. Many of the areas alongside the River Ching are in Flood Zone 2 (see Figure 16.2). Although the River Lee is no longer tidal, the lower reaches have a tidal influence from the River Thames because the River Lee is 'tide locked' at high tide by Three Mills Lock. This can lead to an increase in water levels in the River Lee and Dagenham Brook<sup>48</sup>.

Although flooding has not occurred recently, the Dagenham Brook also poses a risk to both residential and commercial properties in the densely populated area of Coppermill Lane and the Argall Avenue Industrial Estate. The last recorded flood was in 1977, with two near miss events in 1993 and 2000<sup>49</sup>. The near misses were a direct result of the adjacent River Lee Flood Relief Channel running at full capacity. This still remains the principal threat to flooding in the Dagenham Brook. A scheme to reduce the risk of future flooding is being developed with the Environment Agency and stakeholders.

### 5.12.2 Likely Future Conditions

The increases in population will drive further water demand in the Borough. The NLAR scheme will help to build some resilience for the future of Waltham Forest and the surrounding Boroughs. The growing population will put more strain on water resources. Development could result in the loss of green spaces to hardstanding surfaces. This will reduce water infiltration, increase surface runoff and subsequently increase the risk of flooding, unless sustainable urban drainage solutions are adopted. Taking predicted rainfall patterns into account, it could be assumed that there will be an increase in areas subjected to flooding. Rising sea levels may also give rise to more extreme tidal flooding events, from the River Thames.

### 5.12.3 Sustainability Issues

The following sustainability issues were identified:

- Diffuse urban water pollution exists in local rivers and water bodies.
- Increasing population will put strain on water resources.
- Potential impacts of the Local Plan policies and site allocations on groundwater need to be identified and addressed.
- There should be no deterioration in the health and quality of existing water bodies and development should improve the status of waterbodies to achieve 'Good Overall Status' in accordance with the Water Framework Directive', such as through installing rain planters and reed beds.

<sup>47</sup> London Borough of Waltham Forest Council, Level 1 Strategic Flood Risk Assessment, 2018

<sup>48</sup> Waltham Forest Local Flood Risk Management Strategy, 2014

<sup>49</sup> Environment Agency, Dagenham Brook Flood Alleviation Scheme, 2015

- High number of properties at risk of flooding and there is a need to promote flood resistance and resilience measures for these properties. In response to this risk proposals have been developed for Critical Drainage Areas.
- There is a need to promote construction of new flood resistance and resilience measures for existing and future properties to ensure they are resilient to the future effect of climate change and protected against future flood risk.
- Natural flood management techniques should be promoted.
- Ensure that existing flood defences are maintained responsibly by the riparian owner and for remedial works to be carried out where necessary.
- New development will need to allow for an 8 meter buffer zone on both sides of a main river to allow access to the flood defences for maintenance or essential remedial work as well as promoting green and blue infrastructure links, water quality and human health.
- New development will need to incorporate SUDS to sustainably reduce flood risk and there is a need to encourage the retrofitting of existing developments with SUD systems.
- Need to promote the use of new technologies and innovation in flood mitigation measures.
- No action has yet been taken to address the significant flood risk posed by Dagenham Brook to both residential and commercial properties.
- Climate change could interact with increased development to create more flooding events of a higher severity throughout the borough. Waltham Forest needs to be prepared and ready to respond to such events.

#### 5.12.4 Data Gaps

There is a lack of recent data available concerning the health of water bodies within the Borough. This was last updated in 2016. The level 2 SFRA is also awaiting completion and should provide more detail on flooding within the Borough.

### 5.13 Biodiversity

#### 5.13.1 Introduction

Biodiversity includes not only the variety of individual species but also the genetic diversity within species and the range of ecosystems that support them. The UK Biodiversity Action Plan, published in 1994, sets out a programme for the conservation of the UK's biodiversity and led to the production of 436 action plans to achieve the recovery of many of the UK's most threatened species and habitats.

Whilst the majority of Waltham Forest is built up, the Borough benefits from open parkland, woodlands and reservoirs with 31%<sup>50</sup> of the land consisting of open greenspace. Preserving open green spaces in urban environments is crucial for providing habitats for nature as well as enhancing peoples' wellbeing.

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<sup>50</sup> Biodiversity in Waltham Forest, Report of Neighbourhoods Scrutiny Committee, December 2015

The Borough is bordered by Epping Forest in the north and east, and the Lee Valley runs which runs down the western side. Waltham Forest has two sites of international importance for nature conservation:

- Lee Valley SPA and Ramsar: This is a wetland of international importance.
- Epping Forest SAC: Epping Forest has been designated for its broad leaved deciduous woodland habitat.

There are also four SSSIs which have all been designated for biological interests within the borough<sup>51</sup>.

### 5.13.2 Likely Future Conditions

The conditions of many units of the SSSI sites are considered to be in either unfavourable with no change or to be in an unfavourable and declining condition, with the primary reason for these designations being put down to air pollution, particularly the influence of nitrates. As the population continues to rise the air pollution may well become more of a prominent issue and may lead to further degradation of the SSSI sites. However, the introduction of the BAP targets and the implementation of better management regimes, may well see these sites recover.

### 5.13.3 Sustainability Issues

The following sustainability issues have been identified:

- Large areas of the SSSI sites are considered to be in either unfavourable with no change or an unfavourable and declining condition.
- Increases in population will cause a demand for more development, where there is a potential for loss of valuable habitats which have yet to be designated for nature conservation as a direct result.
- SSSIs and European sites within the Borough are under threat from poor air quality, recreational pressure and urban effects (including issues with litter).
- Support is needed to achieve local BAP targets.
- Promote effective land-management to support, protect and enhance biodiversity.
- Consider and plan for the impacts of climate change on species and habitats.
- Encourage people to engage with the ownership, design, management, maintenance and use of their environment as part of their own vision for their neighbourhood.
- Protect and enhance the wildlife and habitats in Waltham Forest, in particular those of international, national and regional importance.
- Need to recognise the wider benefits of ecosystem services; minimise impacts on biodiversity.
- Increase awareness that green infrastructure and resilient ecological networks play an important role in aiding climate change adaptation and resilience.
- Seek to enhance green infrastructure networks within the Borough.
- Ensure current ecological networks are not compromised, and future improvements in habitat connectivity are not prejudiced.
- In line with NPPF paragraph 174, new development should achieve biodiversity net-gain in a hierarchical approach with on-site net-gain being preferred and off-site compensation as a last resort.

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<sup>51</sup> Natural England Designated Sites View, <https://designatedsites.naturalengland.org.uk/SiteSearch.aspx>

- Work to conserve and enhance the local environment.

#### 5.13.4 Data Gaps

There were issues in obtaining up to date condition data on the SSSIs, with many of them being last updated in 2010. Without more recent information it is difficult to assess the current situation of these sites.

There are several strategies relevant to the Borough which have not been updated within the last 5 years including the Natural Environment White Paper; England Trees, Woods and Forest Strategy and the England Biodiversity Strategy Climate Change Adaptation principles.

A green and blue infrastructure study is currently being prepared for the Borough and should be finalised in September. An open space strategy is also currently being prepared. When they are available, the findings from these studies will be incorporated into the SA.

### 5.14 Landscape

#### 5.14.1 Introduction

Landscape character is defined as 'a distinct, recognisable and consistent pattern of elements in the landscape that makes one landscape different from another, rather than better or worse'<sup>52</sup>. Landscape gives a locality its sense of place, making it different from neighbouring localities.

Landscapes can be areas designated for their natural beauty or ambience but can also be 'ordinary' places that are not given statutory protection. Urban landscapes also have an important role to play in affecting the quality of people's lives, therefore enhancing 'townscapes' is also important. Townscape is addressed in the separate topic chapter on Townscape and Heritage.

Waltham Forest covers an area of 3,882 ha with 1,205 ha or 31% of this area consisting of open space. Lee Valley Regional Park and Epping Forest partially lie within the borough which significantly contribute to the open space areas. A large proportion of the open space within Waltham Forest is either Metropolitan Green Belt (842ha) or Metropolitan Open Land (211 ha)<sup>53</sup>. The western side of the borough encompasses a large part of the Lee Valley Regional Park, whilst the eastern borough boundary is dominated by Epping Forest. The borough slopes gradually from the forested hills in the east to the low-lying lands of the valley bottom, and ranges between 50m to 0m above sea level<sup>54</sup>. The borough has seven premier parks<sup>55</sup> (Lloyd and Aveling Park, Leyton Jubilee Park, Ridgeway Park, Langthorne Park, Memorial Park, Abbots Park, and Coronation Gardens.

There are key vantage points in the borough where views of the City of London and Canary Wharf are glimpsed at a number of locations including Pole Hill and Leyton Station bridge. In addition, views across the Lee Valley to Alexandra Palace and Muswell Hill occur frequently

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<sup>52</sup> Landscape Character Assessment (2008) <http://www.landscapecharacter.org.uk/> Landscape Character Network

<sup>53</sup> London Borough of Waltham Forest Open Space Strategy, 2010

<sup>54</sup> London Borough of Waltham Forest Characterisation Study, 2009

<sup>55</sup> <https://walthamforest.gov.uk/content/general-information-parks-and-open-spaces> Accessed 24/02/2020.

through the central and western parts of the borough. Friday Hill provides longer views through the majority of the residential neighbourhoods.

#### 5.14.2 Likely Future Conditions

The current situation is unlikely to change in the foreseeable future unless development pressure leads to the loss of open space or amenity land.

#### 5.14.3 Sustainability Issues

The following sustainability problems have been identified:

- Large areas of open space are Metropolitan Green Belt. There is a need to protect these areas of open space from development pressure;
- Need to work to conserve and enhance the local environment;
- Need to establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit; and
- Need to work towards conserving local character and history, by reflecting the identity of local surroundings and materials. This should not prevent or discourage appropriate innovation.

#### 5.14.4 Data Gaps

A land use map has been used in this baseline which dates back to 2011, as a more recent map was not available. Since 2011, it is likely that some areas have undergone land use changes, hence there could now be some inaccuracies in this data.

The version of the open space strategy used in the PPP review was a draft version. A final version could have slightly different details, although it is expected that the key messages will not change.

A tall buildings strategy is currently being prepared for Waltham Forest. When it is available, the findings will be incorporated into the SA.

### 5.15 Waste

#### 5.15.1 Introduction

The way in which waste is dealt with has important environmental, social and economic consequences; it has an important role in achieving sustainable development. In 2015 the UK generated 26.7 million tonnes of household waste, with an average of 407kg per person.

At present, over half of the rubbish generated in North London is sent for disposal outside of London million with over 70% of this going to landfill<sup>56</sup>. There is a real need to reduce waste generation and for it to be managed in a more sustainable way, with an emphasis on reuse, recycling and recovery. Waltham Forest has worked jointly with six other North London Boroughs to produce a North London Joint Waste Strategy. A new energy-from-waste plant to

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<sup>56</sup> North London Waste Plan (Draft), 2015



serve North London is being developed in the London Borough of Enfield, just beyond the Waltham Forest boundary.

Waste production per household in Waltham Forest is higher than the national and London averages. There is a downward trend in volume of waste generated but Waltham Forest is now the 4<sup>th</sup> worst performing borough when it comes to recycling and waste. Waste collected per household is above the national average by over 100kg. However, Waltham Forest has seen an overall decrease in kg of waste generated between 2017/18 and 2018/19, reflecting the London and National trends<sup>57</sup>. Waltham Forest recycled around 27% of household waste in 2017. This falls short of both the national average of 43.70% and the London average of 33.0%<sup>58</sup>.

### 5.15.2 Likely Future Conditions

Waltham Forest is slowly reducing the generation of waste. The introduction of the compulsory recycling scheme in 2007 has helped to improve this and has been reflected in the rise in recycling rates. Continuation of community programmes such as recycling rewards should help to encourage residents to think more about waste. The introduction of the North London Waste Plan is likely to have a positive effect on the waste management in Waltham Forest.

### 5.15.3 Sustainability Issues

The following sustainability issues have been identified:

- The amount of waste produced is reducing but still exceeds both the London and national average;
- The London Plan encourages greater self-sufficiency for waste management in London and sustainable transportation of waste;
- Recycling is increasing but continues to fall short of government targets;
- Need to minimise the impact of municipal waste management on the borough's environment;
- Need to reduce the carbon footprint of municipal waste;
- Need to ensure that all waste is managed in the most environmentally friendly way; and
- Need to ensure that future development will not compromise the ability of the borough to deal with waste.

### 5.15.4 Data Gaps

An Annual Monitoring Report was not available after 2015 for the borough. Therefore, the current condition of waste production, collection and recycling could not be ascertained for 2019/20.

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<sup>57</sup> Local government association, Residual household waste per household in Waltham Forest (generated report)

<sup>58</sup> WRAP.org London key waste and recycling data <http://laportal.wrap.org.uk/LWARBKeyData.aspx> Accessed 14/01/2020

## 6 Alternative Options

### 6.1 Introduction

The section below depicts the effects predicted for the strategic options and two different spatial strategy options.

Strategic options were proposed as areas in which development should be focused. These areas do not have defined boundaries but are a general guidance of locations within the Borough that Waltham Forest Council wish to guide future development.

### 6.2 SA of Strategic Options

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

The Direction of Travel document presented options for consultation, comprising six spatial strategy options (strategic growth options) for development in the Borough and a number of policy direction options, which were considered under the following ten topics. These options, presented in Table 7, were subject to SA and an HRA screening exercise.

**Table 7: Direction of Travel Options Appraised**

<b>Direction of Travel Options Appraised</b>	
Strategic growth options: <ul style="list-style-type: none"><li>• Option 1: Developer Led;</li><li>• Option 2: Key Growth Areas;</li><li>• Option 3: Growth Hubs;</li><li>• Option 4: Town Centres;</li><li>• Option 5: Combined Approach; and</li><li>• Option 6: Exceptional Circumstances.</li></ul>	Policy direction topics: <ul style="list-style-type: none"><li>• Decent Homes for Everyone;</li><li>• Building a Resilient Economy;</li><li>• Providing Physical Infrastructure;</li><li>• Meeting Social and Community Infrastructure Needs;</li><li>• Distinctive Town Centres and High;</li><li>• Growing Our Culture and Visitor Attractions;</li><li>• Creating High Quality Places;</li><li>• Enhancing and Preserving our Heritage;</li><li>• Protecting and Enhancing our Environment; and</li><li>• Ensuring Climate Change Resilience.</li></ul>

A summary of the SA findings is presented below, and the full report can be found within Appendix D.

Table 8: A summary of the potential significant and uncertain effects for the Strategic Growth Options

Option	Potential Significant Effects
Option 1: Developer-Led	Potential significant negative effects were identified in relation to SA4 (community cohesion and access to community facilities), SA5 (sustainable transport access), SA9 (Air Quality) and SA14 (integrity of SSSI and Natura sites).
Option 2: Key Growth Areas	Potential significant negative effects were identified in relation to SA9 (air quality) and SA14 (integrity of SSSI and Natura 2000 sites). Uncertain effects were identified in relation to the following SA objectives: SA11 (flood risk and climate change resilience), SA12 (efficient use of land), SA15 (green belt and open space), and SA18 (supporting town centres).
Option 3: Growth Hubs	The impact to SA4 community cohesion could be significant and positive, but remains uncertain at this stage. Uncertain effects were identified in relation to a number of SA objectives: SA2 (crime), SA3 (health), SA4 community cohesion, SA7 (greenhouse gas emissions), SA11 (flood risk and climate change resilience), SA12 (efficient use of land), SA13 (biodiversity and the natural environment), SA17 (historic environment) and delivery of employment land (SA19). An uncertain effect was also identified in relation to Natura 2000 sites (SA14).
Option 4: Town Centres	A potential significant positive effect was identified in relation to improving the vitality and viability of town centres. A potential uncertain effect was identified in relation to SA14 due to the proximity of Wood Street town centre to Epping Forest SSSI and SAC site. Uncertain effects were also identified in relation to SA3 (health), SA7 (greenhouse gas emissions), and SA8 (energy conservation).
Option 5: Combined Approach	Significant positive effects were identified in relation to improving vitality and viability of town centres (SA18) and in relation to the delivery of housing (SA1). The impact to SA4 community cohesion could be significant and positive, but remains uncertain at this stage. A potential significant negative effect was identified in relation to SA14 (integrity of SSSI and Natura sites). Uncertain effects were identified in relation to SA7 (greenhouse gas emissions), and SA11 (flood risk and resilience to climate change).
Option 6: Exceptional Circumstances	A potential positive significant effect (with some uncertainty) was identified in relation to the delivery of housing (SA1). A potential significant negative effect was identified in relation to the loss of Green Belt and MOL land (SA15). Potential uncertain significant negative effects were also identified for SA12 in relation to the inefficient use of land and loss of soil and geological resources. There were also a number of uncertain effects of this option such as in relation to effects on the water environment (SA10), energy (SA8), flood risk / climate change resilience (SA11), biodiversity (SA13) and ecological sites (SA14). In addition, uncertain minor negative effects on air quality (SA9), greenhouse emissions (SA7) and the historic environment (SA17) were recorded in the appraisal.

Table 9: Summary of the potential significant and uncertain effects of the Policy Direction Options

Option	Potential Significant Effects
<b>Decent Homes for Everyone</b>	
1. Maximising opportunities to increase the supply of additional homes in the Borough. This includes looking at the redevelopment of brownfield land, supporting Estate Regeneration and working with other sectors such as Registered Providers to maximise any regeneration opportunities within their estate.	<p>Potential significant negative and uncertain effects were identified in relation to waste (SA6), greenhouse gas emissions (SA7), conserving energy (SA8), improving air quality (SA9), water (SA10), climate change resilience (SA11), biodiversity (SA13), SSSI and Natura 2000 sites (SA14), open space / green belt land (SA15), and the historic environment (SA17). Uncertain effects were identified in relation to Community cohesion and access to community facilities (SA4) and Sustainable transport Access (SA5).</p>
2. Supporting and encouraging the delivery of affordable housing	No potential significant effects were identified.
3. Encouraging a range of housing including sheltered housing, residential and nursing care homes; student housing, modular housing, community-led housing, self-build, custom build housing models and Build to Rent.	No potential significant effects were identified.
4. Supporting a mixture of housing tenures (e.g. London Living Rent, London Affordable Rent) and unit sizes including family accommodation	No potential significant effects were identified.
5. Continuing to protect the Borough's housing stock from inappropriate conversion to flats or Homes in Multiple Occupation.	No potential significant effects were identified.
6. Safeguarding existing gypsy and traveller sites (Peacock Close, Folly Lane) and considering future needs.	No potential significant effects were identified.
<b>Building a Resilient Economy</b>	
1. Supporting the retention of existing employment floor space and jobs	No potential significant effects were identified.
2. Promoting more office space development within accessible locations.	The appraisal recorded some uncertain potential significant negative effects resulting from development, such as in relation to local greenhouse gas emissions (SA7), local distinctiveness (SA16), the historic (SA17) and natural environment and biodiversity (SA13), energy use (SA8), greenhouse gas emissions (SA9), waste arisings (SA6).

<b>Option</b>	<b>Potential Significant Effects</b>
3. Ensuring efficient use of land by densifying and intensifying new and existing employment uses and jobs, including a review of how employment uses can be layered with other uses.	The appraisal recorded some uncertain potential significant negative effects resulting from development, such as in relation to greenhouse gas emissions (SA7), local distinctiveness (SA16), the historic (SA17) and energy use (SA8).
4. Promoting employment uses as part of mixed use schemes.	No potential significant effects were identified.
5. Supporting the delivery of affordable and connected workspace.	No potential significant effects were identified.
6. Encouraging the development of creative enterprise zones.	No potential significant effects were identified.
7. Supporting the delivery of employment training opportunities through the planning system.	No potential significant effects were identified.
<b>Providing Physical Infrastructure</b>	
1. Supporting the delivery of digital infrastructure in the Borough.	No potential significant effects were identified.
2. Supporting the delivery of required utilities in the Borough.	Uncertain negative effects may potentially occur in relation to heritage assets (SA17) and the natural environment (SA13) but effects would be dependent on the location and nature of any developments proposed.
3. Ensuring sufficient waste sites within the Borough and opportunities to improve them.	Potential uncertain negative effects were also identified if new waste sites are developed in relation to heritage assets (SA17) and the natural environment (SA13) but effects would be dependent on the location and nature of any developments proposed.
4. Supporting the delivery of on-site utilities and waste facilities on major sites.	No potential significant effects were identified.
5. Ensuring residents have access to sustainable and accessible transport.	No potential significant effects were identified.
6. Supporting transport improvements that increase capacity, and improve user experience.	Potential uncertain significant negative effects could occur in relation to the loss of soil resources (SA12) and generation of construction waste (SA6). Potential uncertain minor negative effects were also recorded in relation to biodiversity and the natural environment (SA13), integrity of SSSI and Natura 2000 sites (SA14) and heritage assets (SA17) but effects would be dependent on the location and nature of any developments proposed.

Option	Potential Significant Effects
<b>Meeting Social and Community Infrastructure Needs</b>	
1. Safeguarding all existing social and community infrastructure facilities including educational and health.	Potential significant positive effects were identified in relation to health and wellbeing (SA3) and community cohesion (SA4).
2. Supporting the intensification of existing social and community infrastructure facilities.	Potential significant positive effects were identified in relation to health and wellbeing (SA3) and community cohesion (SA4).
3. Encouraging social and community infrastructure facilities as part of residential or other mixed use development schemes.	Potential significant positive effects were identified in relation to health and wellbeing (SA3) and community cohesion (SA4). Uncertain effects were identified in relation to the natural environment (SA13). New development could result in negative effects on the natural environment, but the risk depends on the sites chosen and nature of development.
4. Allocating new sites for social and community infrastructure facilities e.g. hubs of health and care facilities.	Potential significant positive effects were identified in relation to health and wellbeing (SA3) and community cohesion (SA4). Potential uncertain effects were identified with relation to SA3 (health), SA13 (biodiversity) and SA18 (town centres).
5. Ensuring social and community infrastructure facilities are located within reasonable walking distance of new and existing homes.	Potential significant positive effects were identified in relation to health and wellbeing (SA3), community cohesion (SA4) and sustainable transport access (SA5).
6. Continue to work in partnership with social and community infrastructure providers (e.g. One Public Estate) on a range of issues; including delivering more integrated, customer-focused services and generating efficiencies.	Potential significant positive effects were identified in relation to health and wellbeing (SA3), and community cohesion (SA4).
<b>Distinctive Town Centres and High Streets</b>	
1. Maintaining the existing town centre and high street retail hierarchy, including continuing to promote Walthamstow as the major town centre in the Borough.	No potential significant effects were identified.
2. Supporting opportunities for new areas for retail and non-retail uses in growth area, including Lea Bridge	No potential significant effects were identified.
3. Creating a sustainable pattern/distribution of town centre and high streets uses by managing the proportion, grouping and clustering of retail and non-retail uses.	No potential significant effects were identified.
4. Supporting and promoting café, restaurant and night time/ evening economy uses in designated centres.	An uncertain effect was identified in relation to crime (SA2).

Option	Potential Significant Effects
5. Proactively managing vacant floor space in the designated centres by supporting and promoting pop-up and meanwhile uses where appropriate.	Uncertainty was recorded in the appraisal in relation to whether any social benefits would result from the option (SA4). This would depend on the nature of the 'meanwhile' and pop-up uses / businesses.
6. Creating distinctive retail centres - each with a unique 'offer' in terms of their place setting and encouraging a greater degree of differentiation and specialisation between them.	It was uncertain whether creating distinctive retail centres will bring social / community benefits (SA4) and it is uncertain whether specialisation of retail in certain parts of the Borough would reduce accessibility (SA5) and affect local distinctiveness (SA16).
7. Proactively managing the proliferation of particular types of actives likely to make people unhealthy e.g. betting shops and hot food takeaways shops.	No potential significant effects were identified.
<b>Growing Our Culture and Visitor Attractions</b>	
1. Supporting the development of the cultural and creative sectors through grouping of such activities at appropriate locations e.g. cultural clusters or quarters.	An uncertain minor positive effect was identified because this option could support the vitality of town centres (SA18). An uncertain effect was identified (SA4) because it was uncertain whether clustering cultural facilities / attractions would increase access to such facilities for residents. It could reduce access to new facilities if these were clustered in a limited number of places across the Borough. It was uncertain that creating clusters would increase access by sustainable transport modes (SA5). Clusters should be directed to locations with good sustainable transport access.
2. Encouraging the provision of community spaces for local events and festivals.	No potential significant effects were identified.
3. Promoting cultural uses in designated centre e.g. galleries and performance spaces.	No potential significant effects were identified.
4. Working with developers and other stakeholders to encourage more public art and culture within developments e.g. public art, music venues, cinemas and theatres.	No potential significant effects were identified.
5. Supporting the provision of visitor accommodation within the Borough.	An uncertain minor positive effect was identified because the option could increase air pollution from transport, depending on where new visitor accommodation is located in the Borough (SA9).
6. Supporting a thriving evening economy across the Borough.	No potential significant effects were identified.
7. Working to secure more public art and culture through	No potential significant effects were identified.

Option	Potential Significant Effects
planning obligations	
<b>Creating High Quality Places</b>	
1. Continuing to support high quality and inclusive design in the public realm and development through our Design Review Panel and using current industry standards in design.	There was some uncertainty surrounding SA17 (historic built environment) and without policy direction option 5, this option could lead to some new developments not respecting local character and distinctiveness.
2. Promoting active living environments through connectivity and walkability in and between developments.	An uncertain minor positive effect was identified in relation to biodiversity and the natural environment, as it is not certain that more green spaces would be created.
3. Supporting the use of Designing Out Crime principles to reduce anti-social behaviour and the fear of crime in developments and in the public realm.	Potential significant positive effects were identified in relation to crime reduction (SA2).
4. Encouraging appropriate density, scale, massing and height in development to reflect the character, local distinctiveness, and context of the Borough.	A potential significant positive effect was identified in relation to promoting local distinctiveness (SA16).
5. Considering where tall buildings may be appropriate in the Borough.	No potential significant effects were identified.
6. Ensuring places are designed to promote positive amenity impacts and support the health and wellbeing of residents.	A potential significant positive effect was identified in relation to health and wellbeing (SA3), as this option aims to create well designed places that promote improved access to amenities, whilst also supporting the health and wellbeing of the Borough's residents.
<b>Enhancing and Preserving our Heritage</b>	
1. Ensuring that new development respects heritage assets and their settings.	Potential significant positive effects were identified in relation to the conservation and enhancement of the historic built environment within the Borough (SA17).
2. Promoting heritage-led regeneration and seeking appropriate beneficial uses and improvements to historic buildings, spaces and areas.	Potential significant positive effects were identified in relation to the conservation and enhancement of the historic built environment (SA17) as well as the local distinctiveness and character of the Borough (SA16).
3. Promoting and encouraging access to the Borough's unique heritage offer as part of its arts and culture programme.	Potential significant positive effects were identified in relation to the conservation and enhancement of the historic built environment (SA17) as well as the local distinctiveness and character of the Borough (SA16).
4. Encouraging the restoration of heritage assets at risk or under threat.	Potential significant positive effects were identified in relation to the conservation and enhancement of the historic built environment (SA17) as well as the local distinctiveness and character of the Borough (SA16).
<b>Protecting and Enhancing our Environment</b>	

Option	Potential Significant Effects
1. Continuing to resist the inappropriate loss of the Green Belt, Metropolitan Open Land and open spaces.	There was some uncertainty as to whether housing targets will be met through development outside of Green Belt, Metropolitan Open Land or open space areas and an uncertain effect was therefore identified for SA1. Significant positive effects were identified in relation to biodiversity and the natural environment (SA13).
2. Supporting the provision of new open space in new development proposals.	Significant positive effects were identified in relation to biodiversity (SA13), health and wellbeing (SA3) and SA15 (maintain and enhance the quality of the green belt and open space areas).
3. Identifying areas where the new 'local green space' designation could be applied. Encouraging new development proposals to provide new or enhanced outdoor sports facilities, playing pitches and child play areas.	Potential significant positive effects were identified in relation to green belt and open spaces (SA15), community cohesion (SA4), and health and wellbeing (SA3). A potential uncertain significant positive effect was identified in relation to town centre viability (SA18), as the provision of new open green spaces would depend on the results of the call for sites process.
4. Protecting and enhancing the Borough's biodiversity, especially where habitats, species and sites are recognised at international, national, regional and local level.	Potential significant positive effects were identified in relation to greenbelts and open spaces (SA15), SSSI and Natura sites (SA14) and biodiversity (SA13). Some uncertain minor positive effects were identified with regards to air quality (SA9), and climate change resilience (SA11). The effect of these policies on the SA objectives were dependent upon the initiatives selected.
Ensuring Climate Change Resilience	
1. Introducing more proactive interventions to enable a more sustainable, low carbon future for Waltham Forest e.g. strengthening district heating networks.	Potential significant positive effects were identified with regard to reduction of greenhouse gas emissions (SA7).
2. Encouraging active and sustainable transport within the Borough to support carbon dioxide and particulate reduction and promote air quality improvement.	Potential significant positive effects were identified with regards to air quality (SA9) and sustainable accessibility (SA5).
3. Supporting sustainable design, materials and construction methods.	There were some uncertainties regarding the type of sustainable design features incorporated within developments (SA10, SA11 and SA13), and further details would be needed when a policy is drafted to determine the overall effect of the policy.
4. Working with utility companies and other stakeholders on ensuring water and energy efficiency.	No potential significant effects were identified.
5. Working with the Environment Agency and other stakeholders on flood impact and mitigation.	No potential significant effects were identified.

## 6.3 SA of Spatial Strategy Options

A Growth Capacity Study was completed in June 2018 on behalf of LBWF<sup>59</sup> which identified a range of potential development sites and their capacities for development across the Borough. This work has been used to identify a collection of 'growth clusters' across the Borough, forming a New Spatial Strategy based on the 'Combined Approach' option (Option 5) (referred to in Section 6.2), in order to meet challenging new housing need/targets.

This New Spatial Strategy has been tested through the SA together with a further reasonable alternative option of continuing with the existing spatial strategy.

This section presents the findings of the assessments of the two spatial strategy options:

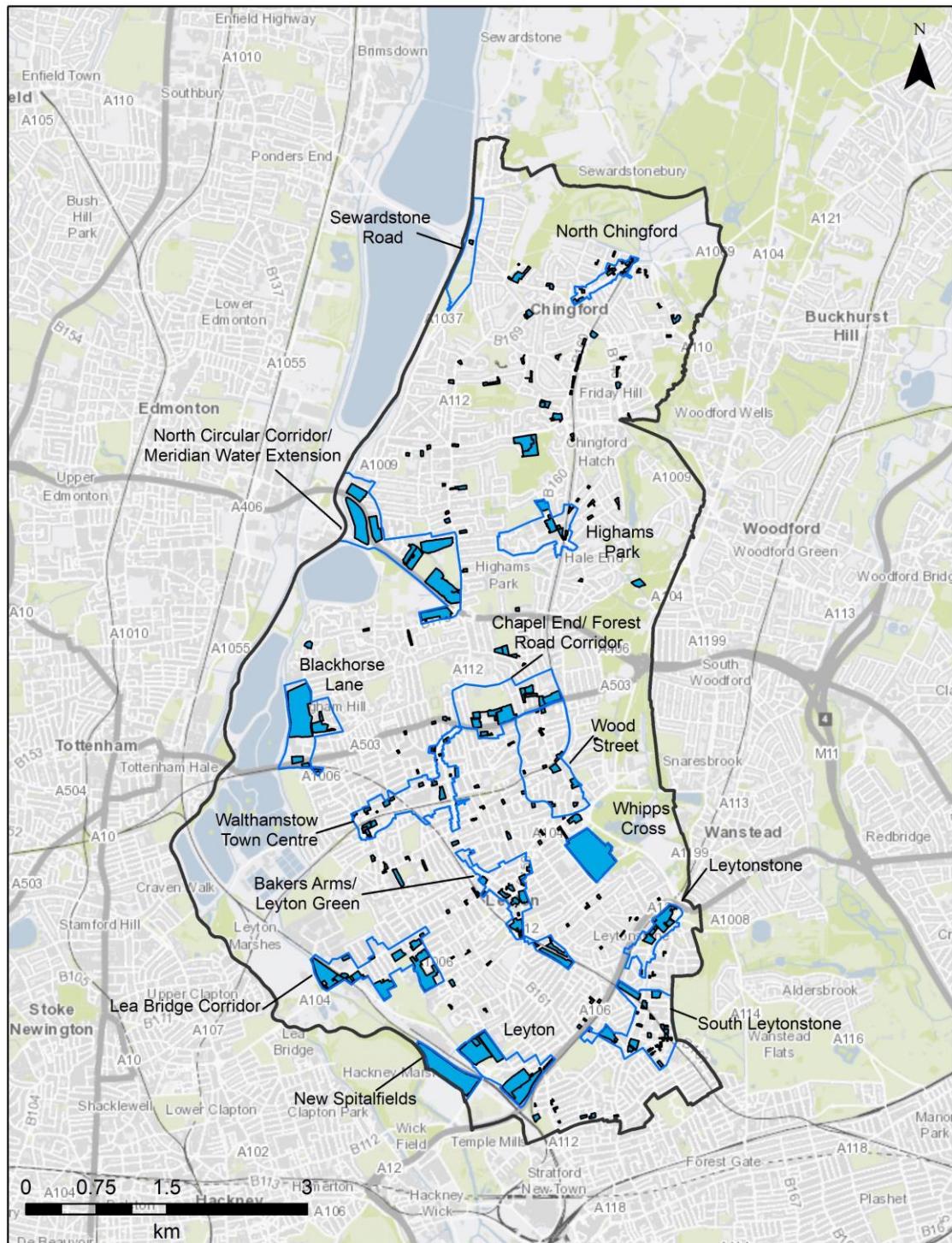
- New Spatial Strategy; and
- Existing Spatial Strategy.

### 6.3.1 New Spatial Strategy Assessment

This section summarises the potential effects which have been identified through the assessment of the individual growth clusters and takes a strategic view. It was also informed by the consideration of potential cumulative effects. Figure 3 presents the distribution of growth capacity sites (by cluster) within the New Spatial Strategy. Appendix E provides a summary of performance of each of the proposed clusters.

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<sup>59</sup> <https://walthamforest.gov.uk/content/evidence-base-development-plan-documents>



**Legend**

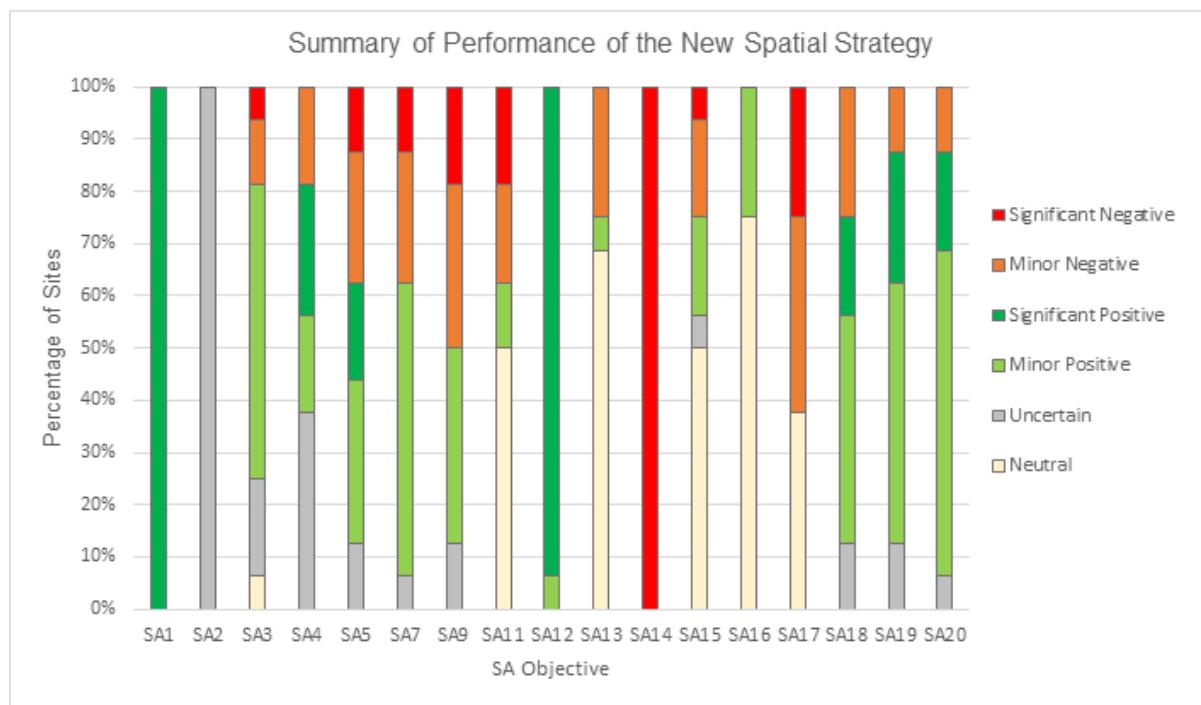
- Waltham Forest Borough Boundary
- New Spatial Strategy Clusters
- Growth Capacity Study Sites





Figure 3: New Spatial Strategy

Figure 3 combines the potential effects of the individual growth clusters which formed the New Spatial Strategy in order to present a graphical summary of the overall performance against each SA objective.



**Figure 4: Summary Performance of the New Spatial Strategy**

Significant positive effects were identified for all growth clusters in relation to SA1 (housing). However, the whole strategy does not deliver the new housing target of 26,910 homes to be delivered over the 15 year Local Plan duration. The New Spatial Strategy falls short by 3,000 homes and therefore when considering the spatial strategy as a whole, it was not fully achieving SA1. With regards to crime (SA2) the effect of the new spatial strategy on crime rates was uncertain. Regeneration and new developments could help indirectly to reduce crime rates in certain locations, but this would also be affected by policy, such as in relation to design of developments. Mainly positive effects were identified in relation to health and health inequalities (SA3). Some specific locations lacking access to healthcare facilities and / or recreation facilities were identified within the assessments and these performed less well against SA3. Similarly, mainly minor and significant positive effects were identified in relation to community cohesion. Some specific areas lacking in community facilities identified within the assessments performed less well in relation to SA4 (community cohesion).

Mixed performances were recorded with regards to accessibility via sustainable transport modes (SA5), carbon emissions (SA7) and air quality (SA9) which are interrelated. Accessibility in some locations was good and some positive effects were identified, which would potentially result from locating development in these areas. The assessments of the growth clusters identified potential for cumulative negative effects from the New Spatial Strategy in relation to increased air pollution and carbon emissions which could occur Borough-wide. This could exacerbate existing sustainability issues identified within the SA baseline. Mitigation was put forward below in order to reduce or offset these potential effects.

Most development in this spatial strategy would not be located within areas at risk from flooding (SA11). However, some potential negative effects were identified where a small number of development sites were at risk of flooding. These included 16 potential development sites located within Flood Zone 3 in the 'North Circular Corridor/Meridian Water Extension', 'Blackhorse Lane' and Lea Bridge Corridor' growth clusters. The new spatial strategy makes efficient use of land and therefore performed very well in relation to SA12 (efficient use of land and buildings) with significant positive effects identified in the assessment. The majority of effects in relation to biodiversity (SA13) were neutral, however, a small number of sites could potentially result in minor negative effects due to the presence onsite or proximity to priority habitats.

Significant negative effects were identified for all growth clusters in the New Spatial Strategy in relation to SA14 (SSSI and Natura 2000 sites). The HRA screening identified likely significant effects on European sites could occur as a result of the strategy, particularly in relation to recreational pressure, air quality and water pollution and hydrological changes. These issues will need to be assessed within the separate Appropriate Assessment, the findings will inform the assessment of the draft Local Plan in due course.

Although 50% of the growth clusters proposed within the New Spatial Strategy would not affect Green Belt and open space areas, the remaining 50% could result in either uncertain, minor negative or significant negative effects in relation to SA15 (Green Belt and open space). The New Spatial Strategy included some small changes to the green belt boundary at Lea Bridge Corridor, Leytonstone and Whipps Cross. This erosion of green belt land could potentially result in a minor cumulative negative effect in relation to SA15 in the south eastern part of the Borough. Minor positive effects were identified in relation to local distinctiveness (SA16) but no potential positive effects were identified in relation to the historic environment (SA17). Indeed over 60% of the growth areas assessed could have resulted in minor (35%) or significant negative effects (25%) in relation to the historic environment. These are located within the central southern part of the Borough. The assessments identified mainly positive effects with regard to the economic SA objectives; SA18 (town centres), SA19 (supporting the local economy) and SA19 (maintaining stable employment). For the locations where potential negative and uncertain effects were identified, mitigation was put forward relating to policy principles, including ensuring that uses do not compete with town centre uses and considering the inclusion of employment or mixed use developments within those growth cluster.

Potential cumulative effects were identified in the assessments of the individual growth clusters as presented in Table 10 below.

**Table 3: Potential cumulative effects identified in the assessment of the New Spatial Strategy**

Cluster	Potential cumulative effects
Sewardstone Road	Potential negative cumulative effects in relation to SA7 (greenhouse gases) and SA9 (air quality).
Blackhorse Lane	Potential negative cumulative effects in relation to SA7 (carbon emissions) and SA9 (air quality).
Chapel End Forest Road Corridor	Potential negative cumulative effects in relation to SA7 (carbon emissions) and SA9 (air quality).
Whipps Cross	Uncertain potential cumulative effects have been identified for this area in relation to SA7 (carbon emissions) and SA9 (air quality).

North Circular Corridor / Meridian Water Extension	Potential negative cumulative effects in relation to SA7 (carbon emissions) and SA9 (air quality).
South Leytonstone	Potential negative cumulative effects in relation to SA7 (carbon emissions) and SA9 (air quality).
Lea Bridge Corridor	Potential negative cumulative effect in relation to SA9 (air quality).
New Spitalfields	Potential negative cumulative effects in relation to SA7 (greenhouse gases) and SA9 (air quality).
Lea Bridge Corridor, Leytonstone and Whips Cross	Potential negative cumulative effect in relation to SA15 (green belt and open space).
Growth clusters in the central southern part of the Borough	Potential cumulative negative effects in relation to SA17 (historic assets) and SA16 (local distinctiveness).

### 6.3.2 Existing Spatial Strategy Assessment

It was considered reasonable that should the New Spatial Strategy not be taken forward then the spatial strategy set out within the existing Core Strategy would continue. Therefore, the SA considered the potential effects of the Existing Spatial Strategy set out within the Core Strategy<sup>60</sup> (2012) as an alternative to the New Spatial Strategy.

The existing spatial strategy aims to centre growth around four key ‘Growth Areas’; Blackhorse Lane, Northern Olympic Fringe; Walthamstow Town Centre and Wood Street. In addition to development in these key Growth Areas, the strategy also aims to focus development around the Borough’s Town, District and Neighbourhood Centres. This is presented in Figure 5 below.

It is a requirement of the SEA Directive that reasonable alternatives are assessed in the same level of detail as those options being put forward in the emerging plan. In light of this, the same methodology that was applied for the assessment of the new Spatial Strategy was used.

As some of the Neighbourhood Centres did not contain potential development sites they were not included within the assessment of the Existing Spatial Strategy. The assumption was made that no development will go forward in these areas as no sites have been identified. These Neighbourhood Centres are Francis Road, Forest Road and Hatch Lane Neighbourhood Centres.

Appendix E provides a summary of performance for each of the Existing Spatial Strategy clusters (Growth Areas, Town, District or Neighbourhood Centres) which were assessed as part of the Existing Growth Strategy.

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<sup>60</sup> Waltham Forest Borough Council, Waltham Forest Local Plan – Core Strategy, 2012

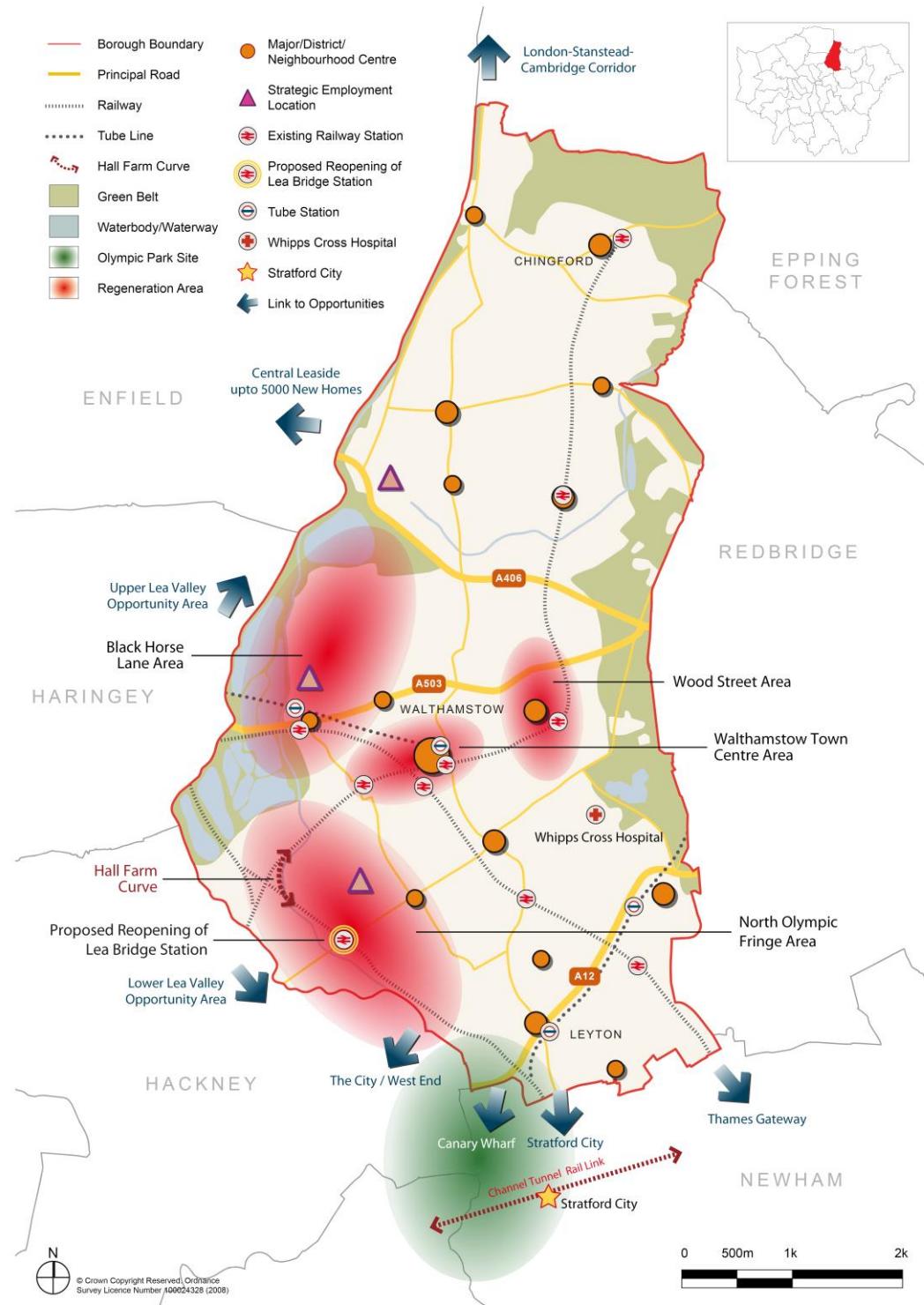


Figure 5: Existing Spatial Strategy within the Core Strategy

Figure 6 combines the potential effects of the individual growth clusters which form the Existing Spatial Strategy in order to present a graphical summary of the overall performance against each SA objective.

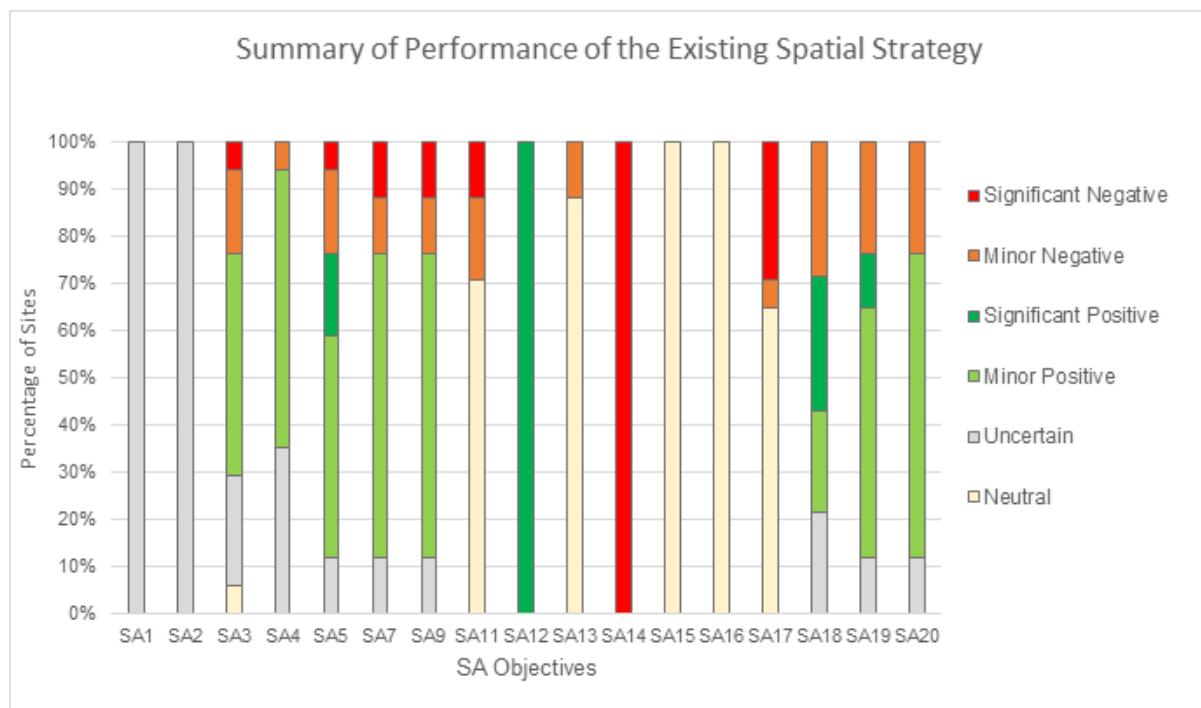


Figure 6: Summary Performance of the Existing Spatial Strategy

For the Existing Spatial Strategy, uncertainty was recorded for SA1 in all growth areas because it was not known how the new housing target would be allocated across the locations which make up this spatial strategy. It was considered uncertain whether this strategy could indeed deliver the housing target. The effect of the Existing Spatial Strategy on crime (SA2) was assessed as uncertain. Regeneration and new developments could help indirectly to reduce crime rates in certain locations but this would also be affected by policy, such as in relation to design of developments.

Mainly positive or neutral effects were identified in relation to health and health inequalities (SA3). Some specific locations lacking access to healthcare facilities and / or recreation facilities were identified within the assessments and these performed less well against SA3. A potential significant negative effect was identified in relation to directing development to Leyton District Centre which has poor access to both healthcare and recreational facilities. Development here could put more people at a disadvantage with regards to access to healthcare facilities and recreation facilities. Mainly positive effects were identified in relation to community cohesion although some specific areas lacking in community facilities were identified within the assessments, in which case an uncertain effect on community cohesion (SA4) was identified for several sites.

The Existing Spatial Strategy performed slightly better than the New Spatial Strategy with regards to accessibility by sustainable transport (SA5). Although the Existing Spatial Strategy consists of four main Growth Areas concentrating development to the south west and centre of the Borough it also directs development to a high number of Town, District and Neighbourhood centres which have good PTAL scores and this is likely to be the reason why the strategy

performs relatively well with regards to accessibility. For the same reasons, the Existing Spatial Strategy also scored relatively well with regards to carbon emissions (SA7) and air quality (SA9). However, some potentially minor, significant and cumulative negative effects were identified in relation to these SA objectives. Potential increases in car use resulting from development in locations with poor access by sustainable transport could exacerbate existing sustainability issues identified within the SA baseline. Potential negative effects in relation to air quality and carbon emissions were identified in the far north and south of the Borough.

Most development in the Existing Spatial Strategy would not be located within areas at risk from flooding (SA11). However, 30% are located within Flood Zones 2 and 3. Eight potential development sites are located within Flood Zone 3 located within the Blackhorse Lane and Olympic Fringe Growth Areas. Potential significant negative effects were identified for these Growth Areas within the assessment. The majority of effects in relation to biodiversity (SA13) were neutral however, a small number of sites could potentially result in minor negative effects due to the presence onsite or proximity to priority habitats. Significant negative effects were identified for all growth clusters in the New Spatial Strategy in relation to SA14 (SSSI and Natura 2000 sites) and it was therefore assumed that this would also be the case for the Existing Spatial Strategy, although this alternative option was not subject to HRA screening at this stage. The HRA screening of the New Spatial Strategy has identified likely significant effects on European sites could occur as a result of growth across the Borough in relation to recreational pressure, air quality and water pollution and hydrological changes. Should the Existing Spatial Strategy be taken forward, it would have needed to be subjected to HRA screening and, depending on the findings, Appropriate Assessment at the draft Local Plan stage. Appropriate Assessment is required for all new non-replacement development as advised by Natural England. Neutral effects were identified in relation to SA15 (Green Belt and open space). This is a key difference between the Existing Spatial Strategy and the New Spatial Strategy, where potential significant negative effects were identified due to development of some Green Belt land.

Neutral effects were identified for all parts of the Existing Spatial Strategy in relation to local distinctiveness. It was difficult to assess this objective as the nature of development in this location had not been identified and no specific issues regarding local distinctiveness had been identified. Therefore, a neutral effect was given for all areas in this spatial strategy and an enhancement measure proposed to address this. No potential positive effects were identified in relation to the historic environment (SA17). Indeed over 35% of the growth areas assessed could have resulted in minor (5%) or significant negative effects (30%) in relation to the historic environment. This was a better performance against this objective compared to the New Spatial Strategy. The potential negative effects associated with this strategy were also located within the central southern part of the Borough. The assessments identified mainly positive effects with regard to the economic SA objectives; SA18 (town centres), SA19 (supporting the local economy) and SA19 (maintaining stable employment). For the locations where potential negative and uncertain effects were identified, mitigation was been put forward relating to policy principles, including ensuring that uses do not compete with town centre uses and considering the inclusion of employment or mixed use developments within those growth cluster.

The following potential cumulative effects were identified in the assessments of the individual growth clusters.

**Table 4: Potential cumulative effects identified in the assessment of the Existing Spatial Strategy**

Cluster	Potential cumulative effects
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Blackhorse Lane Growth Area	Uncertain potential negative cumulative effects in relation to SA7 (carbon emissions) and SA9 (air quality).
Northern Olympic Fringe Growth Area	A potential negative cumulative effect has been recorded with regards to SA7 (greenhouse gas emissions) and SA9 (air quality).
South Chingford District Centre	Potential negative cumulative in relation to SA7 (carbon emissions) and SA9 (air quality).
Sewardstone Road Neighbourhood Centre	Potential negative cumulative effects in relation to SA7 (carbon emissions) and SA9 (air quality).
Markhouse Corner Neighbourhood Centre	Potential negative cumulative effects have been identified in relation to SA7 (carbon emissions) and SA9 (air quality).
Thatched House Neighbourhood Centre	Potential negative cumulative effects have been identified in relation to SA7 (carbon emissions) and SA9 (air quality).
Growth clusters in the central southern part of the Borough	Potential cumulative negative effects in relation to SA17 (historic assets) and SA16 (local distinctiveness).

## 7 Assessment of the Local Plan Policies

### 7.1 Introduction

A detailed assessment of the draft Local Plan policies was carried out in Summer/Autumn 2019 and presented in the previous SA report to support the Regulation 18 consultation. At this stage mitigation measures were suggested to address the identified potentially significant or uncertain effects and this mitigation has informed the drafting of the Regulation 19 Proposed Submission Local Plan policies. As stated in Section 1, this document is the updated SA report which presents the findings of the assessment of the plan policies since their subsequent revision and which now form the Proposed Submission Local Plan Part 1 policies.

This section of the document reports on the potential significant and uncertain residual effects of the Regulation 19 policies contained within the Local Plan Part 1. These effects are presented in Tables 12-15 for the Spatial Strategy and in Tables 16-28 for the Thematic Policies. There are no residual significant negative effects identified in the assessment of the Proposed Submission Local Plan Part 1.

All policies were subject to assessment against the SA Framework of objectives (see Table 2). Summaries of the significant effects (including uncertain effects) are provided in this section with reference to the SA objectives in Table 2. Mitigation measures put forward to address residual uncertain effects can be found in the detailed assessments in Appendix C and are also presented in Section 9.

## 7.2 Potential Significant Effects of the Local Plan Part 1 Spatial Strategy Policies

Table 12: Summary of Potential Significant and Uncertain Effects for the Spatial Strategy

Local Plan Policy	Potential Effect	Potential Significant Effects Description
Policy 1: Presumption in Favour of Sustainable Development		No potential significant or uncertain effects have been predicted for this policy.
Policy 2: Scale of Growth	Significant positive	SA1: The policy sets out the scale of growth across the borough and includes the net increase of housing to be planned for and provided which is 27,000 additional homes. The policy therefore supports the achievement of this objective and addresses key sustainability issues. It is considered to have a significant positive effect.
	Uncertain	SA14: The HRA of the Local Plan will determine whether this Local Plan policy will result in an adverse effect on Natura 2000 sites. The policy could contribute to a range of potential effects such as in relation to air quality and recreation pressure, however, the HRA has not yet been concluded. This assessment will be updated when the HRA is concluded.
	Significant positive	SA18: The policy sets out the scale of growth across the borough and includes the net increase of employment to be planned for and provided which is 52,000sqm. The policy will contribute to promoting further investment in the borough's town centres and supports the achievement of this objective and addresses key sustainability issues.
Policy 3: Infrastructure for Growth	Significant positive	SA5: This policy aims to ensure that infrastructure necessary to meet additional infrastructure needs arising from future development will be provided in the borough. This should include specific improvements in public transport, such as Walthamstow Central and Leyton Stations. In addition, a new station should result from the implementation of this policy on Ruckholt Road, linking into the London Overground service. This should enable current and future residents to access the services they require in and beyond the borough via sustainable transport links.
	Uncertain	SA14: The HRA of the Local Plan will determine whether this Local Plan policy will result in an adverse effect on Natura 2000 sites. The policy includes the redevelopment of Whipps Cross Hospital which is very close to Epping Forest SAC, however, the HRA has not yet been concluded. This assessment will be updated when the HRA is concluded.

Local Plan Policy	Potential Effect	Potential Significant Effects Description
Policy 4: Location of Growth	Significant positive	SA1: A total of 27, 000 homes will be delivered through the implementation of this local plan policy. These will be located in strategic areas, to ensure housing growth occurs in appropriate locations which are in good proximity to employment. Other policies within the Local Plan address housing types and affordability (such as policies 25 to 26 on affordable housing, housing tenure and housing size and mix).
	Significant positive	SA12: Development will be intensified and encouraged on brownfield sites, except those which are valued or safeguarded for specific reasons. This will increase land use efficiency and may help to protect soil quality and geological resources at greenfield sites.
	Significant positive	SA20: Future employment numbers are detailed within this policy, which should generate new employment and maintain stable levels of employment within the Borough.
Policy 5: Management of Growth	Significant positive	SA12: Development will be intensified and encouraged on brownfield sites, except those which are valued or safeguarded for specific reasons. This will increase land use efficiency and may help to protect soil quality and geological resources at greenfield sites.
	Significant positive	SA17: Existing heritage assets within Waltham Forest will be protected from future development. Investment will also be directed towards the development of assets and the cultural heritage of the Borough.
	Significant positive	SA20: Future employment numbers are detailed within this policy, which should generate new employment and maintain stable levels of employment within the Borough.
Policy 6: Ensuring Good Growth	Significant positive	SA1: The policy promotes growth and lists policy requirements that development proposals will be expected to satisfy. Criteria C relates specifically to housing and the need to 'provide a broad range of housing choice by size and tenure including affordable housing and cater for people with special housing needs'. The policy therefore supports the achievement of this objective and key sustainability issues.
	Significant positive	SA2: Criteria J of the policy relates specifically to creating safe environments which incorporate appropriate design solutions and crime prevention measures that assist in reducing crime, the fear of crime and anti-social behaviour. The policy supports the achievement of this objective.
	Significant positive	SA3: Criteria B of the policy requires development proposals to contribute to the improving and enabling healthier lifestyles. When implemented this will help improve the standard of health and wellbeing of those who live and work in the borough.
	Significant positive	SA7: Criteria H of the policy requires development proposals to contribute to climate change, through mitigation and adaptation, the use of sustainable building materials and energy efficiency. This will contribute to the reduction of greenhouse gas emissions and promote low carbon growth.

Local Plan Policy	Potential Effect	Potential Significant Effects Description
	Significant positive	SA8: Criteria H of the policy requires development proposals to contribute to climate change, through mitigation and adaptation, the use of sustainable building materials and energy efficiency. This will contribute to conserving energy.
	Significant positive	SA12: Criteria A of the policy requires development proposals to make efficient use of land through intensification and mixed-use development which fully supports the achievement of this objective.
	Significant positive	SA15: Criteria I of the policy requires development proposals to protect and enhance existing green infrastructure including open space. This will contribute to protecting and enhancing open space areas.
	Significant positive	SA17: Criteria K of the policy requires development proposals to protect heritage assets including Conservation Areas and Listed Buildings. This will contribute to conserving and enhancing the historic built environment.
	Significant positive	SA20: Criteria D of the policy requires development proposals to provide for a wide range of local employment opportunities that offer a choice of jobs in different sectors of the economy. This will contribute to maintaining stable levels of employment in the Borough.
Policy 7: Encouraging Mixed Use Development	Significant positive	SA16: The policy encourages mixed use development that is appropriate to the character of the area and which is appropriate to the function of the particular street/road frontage for example. This will contribute to maintaining local distinctiveness.
	Significant positive	SA19: The policy promotes opportunities for mixed development of housing and employment in appropriate locations which will contribute to the achievement of this objective.
Policy 8: Character-Led Intensification	Significant positive	SA12: 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. The policy promotes this kind of development which fully supports the achievement of this objective.
	Uncertain	SA14: The HRA of the Local Plan will determine whether this Local Plan policy will result in an adverse effect on Natura 2000 sites. The policy could contribute to a range of potential effects such as in relation to air quality and recreation pressure, however, the HRA has not yet been concluded. This assessment will be updated when the HRA is concluded.
	Significant positive	SA16: The policy encourages intensification of development that is appropriate to the character of the area and which is appropriate to the function of the particular street frontage for example. This will contribute to maintaining local distinctiveness.
	Significant positive	SA19: The policy promotes opportunities for intensified development of housing and employment in appropriate locations, which will contribute to the achievement of this objective.

Table 13: Summary of Potential Significant and Uncertain Effects for South Waltham Forest

<b>Local Plan Policy</b>	<b>Potential Effect</b>	<b>Potential Significant Effects Description</b>
Policy 9: South Waltham Forest	Significant positive	SA1: 16,000 new homes will be built within the South of Waltham Forest as a result of this policy. It is assumed that a range of sizes and tenures of homes will be provided in line with Policy 14: Affordable Housing Tenure and Policy 15: Housing Size and Mix, in order to meet the needs of the Borough.
	Significant positive	SA2: This policy directly aims to ensure that crime and the fear of crime are reduced through design, specifically in the Lea Bridge and Bakers Arms areas, in accordance with Policy 60: Designing Out Crime. Therefore, a potential significant positive effect has been recorded, although it is noted that this is of local spatial extent due to the specificity of criterion J within the policy.
	Uncertain	SA14: The HRA of the Local Plan will determine whether this Local Plan policy will result in an adverse effect on Natura 2000 sites. Criterion M of the policy seeks to find new linkages to the surrounding area, which could include Epping Forest. This may result in adverse effects on the Epping Forest SAC with regards to increasing recreational pressure, however, the HRA has not yet been concluded. This assessment will be updated when the HRA is concluded.
	Significant positive	SA19: This policy focuses employment development in key areas where employment space is required through intensification and co-location of workspaces with other development types. This should support a diverse and robust economy.

Table 145: Summary of Potential Significant and Uncertain Effects for Central Waltham Forest

Local Plan Policy	Potential Effect	Potential Significant Effects Description
Policy 10: Central Waltham Forest	Significant Positive	SA1: This policy aims to increase the number of homes by 7,600 over the plan period. It is assumed that a range of sizes and tenures of homes will be provided in line with Policy 14: Affordable Housing Tenure and Policy 15: Housing Size and Mix, in order to meet the needs of the Borough.
	Significant positive	SA5: Walthamstow Central will be promoted as a significant transport hub in the area, which may help to reduce all journey lengths, especially those by private car, due to the converging of many transport modes at this location. The policy also seeks to improve facilities and employment access within the central area.
	Uncertain	SA14: Walthamstow Wetlands and Epping Forest may have increased access from extended cycle networks resulting from the implementation of this policy. This may increase awareness and appreciation of these areas some of which are designated as European sites. However, it is unclear how this new access will be managed. An increase in visitors could lead to trampling, litter and destruction of key habitats. The HRA of the Local Plan will determine whether this Local Plan policy will result in an adverse effect on Natura 2000 sites but has not yet been concluded. This assessment will be updated when the HRA is concluded.
	Significant positive	SA18: The vitality of the central zone of Waltham Forest should be improved through the implementation of this policy, especially in Walthamstow Town Centre and in the Blackhorse Lane area. Further developments which may contribute to the night time economy will be encouraged by this policy.
	Significant positive	SA20: Employment levels could be aided by an increase in employment space at Waltham Forest Town Hall Campus and Blackhorse Lane. As this area is within walking distance of good transport links, it is expected that this could provide employment for those living in and surrounding the central area of Waltham Forest. Jobs may also be created through the development of an evening economy, an aspect this policy encourages.

Table 15: Summary of Potential Significant and Uncertain Effects for North Waltham Forest

Local Plan Policy	Potential Effect	Potential Significant Effects Description
Policy 11: North Waltham Forest	Significant positive	SA1: This policy will deliver 3,400 new homes to North Waltham Forest. It is assumed that a range of sizes and tenures of homes will be provided in line with Policy 14: Affordable Housing Tenure and Policy 15: Housing Size and Mix, in order to meet the needs of the borough.
	Uncertain	SA11: Currently potentially available development sites within the North Circular Corridor could be within flood zone 3. FRA will be required to determine suitability for development and development sites would need to pass the sequential test, in accordance with Policy 93: Managing Flood Risk. Policy 93: Managing Flood Risk also encourages developments to be resilient to climate change. An uncertain effect remains as FRA is required to demonstrate that 800 new homes can be delivered within this strategic location without increasing flood risk.
	Uncertain	SA14: The strategic locations within this part of the borough are within relatively close proximity to Epping Forest SAC. The HRA of the Local Plan will determine whether this Local Plan policy will result in an adverse effect on Natura 2000 sites but has not yet been concluded. This assessment will be updated when the HRA is concluded.
	Significant positive	SA15: Green Belt and Metropolitan Open Land is directly protected by this policy, and although access is suggested for improvement, it is stipulated that this should only occur where appropriate.
	Significant positive	SA18: Development is encouraged to occur around three district centres (Highams Park, North Chingford and Chingford Mount) as a result of this policy. The focusing of development to these areas is likely to increase the vitality and viability of these areas.
	Significant positive	SA19: Employment land will be both retained and intensified through the implementation of this policy. This is likely to improve the local economy and encourage employment developments in appropriate locations.
	Significant positive	SA20: Employment within North Waltham Forest and surrounding areas should be increased by the implementation of this policy. Employment space will be intensified and created through this policy, and new job creation is a key focus of criterium C of this policy.

## 7.4 Potential Significant Effects of the Local Plan Part 1 Thematic Policies

Table 16: Summary of the potential significant and uncertain effects of the Decent Homes for Everyone Theme

Local Plan Policy	Potential Effect	Potential Significant Effects Description
Policy 12: Increasing Housing Supply	Significant positive	SA1: The policy relates specifically to increasing housing supply by delivering a minimum of 27,000 homes by 2035 and sets out criteria of how new homes will be delivered. It makes clear how new homes should not only be good quality but should be genuinely affordable and meet the needs of Waltham Forest's existing and future population. It therefore fully supports the achievement of this objective and addresses key sustainability issues.
	Uncertain	SA11: The policy seeks to increase housing delivery in the borough to a minimum of 27,000 homes by 2035. This high number of homes may increase flood risk depending on where development is located which is not specified within this policy.
	Significant positive	SA12: The policy fully supports the achievement of this objective and key sustainability issues which can be seen clearly in Criteria D of the policy which states that new homes will be delivered by maximizing opportunities to increase the supply of additional homes on all suitable, appropriate and available sites including brownfield land, surplus public sector land and encouraging residential intensification. Criteria H of the policy also supports the development of small sites for new homes.
	Uncertain	SA14: This policy advocates intensification of development and could result in increased recreational pressure, air pollution, urbanisation, and spread of invasive species and diseases. The HRA of the Local Plan will determine whether this Local Plan policy will result in an adverse effect on Natura 2000 sites but has not yet been concluded. This assessment will be updated when the HRA is concluded.
	Significant positive	SA18: The policy relates specifically to increasing housing supply and promotes the delivery of new homes next to transport hubs and on all suitable, appropriate and available sites including small sites, developing brownfield land and surplus public sector land. This contributes to maintaining and enhancing the vitality and viability of the Borough's town centres and promoting residential investment in town centres.
Policy 13: Delivering Genuinely Affordable Housing	Significant positive	SA1: The policy promotes the delivery of affordable housing across the borough and sets out a number of criteria of how this will be achieved. It therefore fully supports the achievement of this objective and will help address the shortfall in the provision of affordable housing that are mixed and well-balanced in terms of tenure and income.
	Significant positive	SA18: The policy relates specifically to the delivery of genuinely affordable housing across the borough and therefore promotes residential investment. This will contribute to maintaining and enhancing the vitality and viability of the borough's town centres and support the achievement of this objective.
Policy 14: Affordable Housing	Significant positive	SA1: Delivery of low-cost housing is a priority across the borough. To support this the policy requires housing schemes of 10 or more units to provide the following affordable housing tenure split: - low cost affordable rent:

		70%; - intermediate housing products: 30%. It therefore fully supports the achievement of this objective and will help address the shortfall in the provision of affordable housing that are mixed and well-balanced in terms of tenure and income.
	Significant positive	SA18: The policy relates specifically to the delivery of affordable housing tenure on schemes of 10 or more units across the borough and therefore promotes residential investment. This will contribute to maintaining and enhancing the vitality and viability of the borough's town centres and support the achievement of this objective.
Policy 15: Housing Size and Mix	Significant positive	SA1: The policy fully supports the achievement of this objective and addresses key sustainability issues as it promotes a diverse range of housing size and mix. The priorities for dwelling size and tenures are based on the Strategic Housing Market Assessment and the borough's housing waiting list.
Policy 16: Access and Adaptable Housing		No potential significant or uncertain effects have been predicted for this policy.
Policy 17: Redevelopment of existing housing and estate regeneration	Significant positive	SA1: The policy supports the achievement of this objective as it promotes the delivery of housing through the efficient use of existing land. It recognises how important the redevelopment of existing housing and estate regeneration can provide a range of tenures and genuinely affordable homes which is one of the key sustainability issues for this objective.
	Significant positive	SA12: The policy supports the achievement of this objective as it promotes the delivery of housing through the redevelopment of existing housing and estate regeneration using existing land and buildings. For example, Criteria B requires the loss of any existing housing to lead to a net increase in new homes.
	Uncertain	SA14: The HRA of the Local Plan will determine whether this Local Plan policy will result in an adverse effect on Natura 2000 sites. The policy could contribute to a range of potential effects such as in relation to air quality and recreational pressure, however, the HRA has not yet been concluded. This assessment will be updated when the HRA is concluded.
Policy 18: Other forms of Housing	Significant positive	SA1: The policy supports development schemes for alternative models of housing such as Build to Rent, Purpose Built Student Housing and Purpose-Built Shared Living Housing which will contribute to the achievement of this objective and key sustainability issues. It reinforces how different types of housing play an important role in the Borough. For example, Build to Rent can be delivered faster as it has a different economic model than build for sale homes.
	Uncertain	SA12: An uncertain effect is predicted as this could result in greenfield land being developed if there is any available in the borough such as parks or amenity space which is not protected from development.
Policy 19: Small Sites	Significant positive	SA1: The policy promotes new housing development of small sites (defined as those below 0.25ha) and encourages innovative approaches to housing delivery. This can be achieved through incremental intensification

		of existing residential areas and town centres where appropriate. It therefore fully supports the achievement of this objective and addresses key sustainability issues.
	Uncertain	SA12: An uncertain effect is predicted as the policy does not specify that infill development should be on brownfield sites rather than small greenfield sites. This could lead to the irreversible development of some smaller greenfield sites..
	Uncertain	SA14: The HRA of the Local Plan will determine whether this Local Plan policy will result in an adverse effect on Natura 2000 sites. The policy could contribute to a range of potential effects such as recreational pressure and urban effects, however, the HRA has not yet been concluded. This assessment will be updated when the HRA is concluded.
	Uncertain	SA15: An uncertain effect is predicted as the policy does not specifically mention if greenbelt and open space areas could be developed as a result of the implementation of this policy.
	Significant positive	SA18: The policy relates specifically to promoting residential investment on small sites in existing residential areas and town centres. This will contribute to maintaining and enhancing the vitality and viability of the borough's town centres and support the achievement of this objective.
Policy 20: Housing in Multiple Occupation (HMOs) and Conversions		No potential significant or uncertain effects have been predicted for this policy.
Policy 21: Downsizing	Significant positive	SA1: The policy supports the achievement of this objective and some key sustainability issues in that it promotes and encourages development proposals for self-contained older persons accommodation which also helps release existing family houses back onto the market. The policy encourages self-contained older persons accommodation on all developments over 100 units in suitable locations.
Policy 22: Supported and Specialist Accommodation	Significant positive	SA1: The policy supports the achievement of this objective and key sustainability issues in that it promotes and encourages housing schemes for supported and specialist accommodation which includes specialist older people's housing. In addition, Criteria B of the policy also supports these schemes if they meet the local and strategic housing needs.
Policy 23: Gypsies and Travellers	Uncertain	SA14: The HRA of the Local Plan will determine whether this Local Plan policy will result in an adverse effect on Natura 2000 sites. The policy could potentially contribute to recreational pressure and air pollution, however, the HRA has not yet been concluded. This assessment will be updated when the HRA is concluded.
Policy 24: Community-Led, Self-Build and Custom Build Housing	Significant positive	SA1: The policy supports the achievement of this objective as it promotes schemes for community led housing, self-build and custom build housing projects. These can all play an important role in providing new homes for residents as well as supporting more flexible approaches to the provision of housing

Table 17: Summary of Potential Significant and Uncertain Effects for Building a Resilient and Creative Economy

Local Plan Policy	Potential Effect	Potential Significant Effects Description
Policy 25: Supporting and Boosting Economic Growth and Local Job Creation	Uncertain	A14: The HRA of the Local Plan will determine whether this Local Plan policy will result in an adverse effect on Natura 2000 sites. This policy could potentially contribute to air pollution, however, the HRA has not yet been concluded in relation to air pollution. An air quality assessment is currently underway. This assessment will be updated when the HRA is concluded.
	Significant positive	SA18: The policy supports and promotes employment growth and Criteria A of the policy sets out the provision of a range of employment floorspace typologies to broaden the economic base and maximise additional employment floorspace. This will contribute to maintaining the enhancing the vitality and viability of the borough's town centres.
	Significant positive	SA19: The policy encourages the provision of a range of employment floorspace typologies including distribution uses, industrious space and new London mix. These typologies have been identified from the Waltham Forest Employment Land Review as being appropriate to meet the borough's projected needs in terms of employment floorspace. The policy therefore fully supports the achievement of the objective and will contribute positively to key sustainability issues.
	Significant positive	SA20: The policy supports and promotes the provision of a minimum of 52,000m <sup>2</sup> of additional employment floorspace to help provide opportunities for employment growth in the borough. It is therefore predicted to fully support the achievement of this objective and to address key sustainability issues relating to employment.
Policy 26: Safeguarding and Managing Strategic Industrial Locations (SIL)	Uncertain	SA14: The HRA of the Local Plan will determine whether this Local Plan policy will result in an adverse effect on Natura 2000 sites. This policy could potentially contribute to air pollution, however, the HRA has not yet been concluded in relation to air pollution. An air quality assessment is currently underway. This assessment will be updated when the HRA is concluded.
	Significant positive	SA18: The policy safeguards Strategic Industrial Locations (SIL) to accommodate potential job growth which will contribute to maintaining and enhancing the vitality and viability of the borough's town centres. It will support and promote SILs.
	Significant positive	SA19: The policy safeguards employment land and promotes development on designated employment areas including Strategic Industrial Locations(SIL). This will help unlock opportunities to deliver additional floorspace capacity which will contribute towards the achievement of this objective.
	Significant positive	SA20: The policy protects and safeguards employment land and encourages the delivery of additional employment floorspace which will provide local employment opportunities.
Policy 27: Safeguarding and Managing Locally	Uncertain	SA14: The HRA of the Local Plan will determine whether this Local Plan policy will result in an adverse effect on Natura 2000 sites. This policy could potentially contribute to air pollution, however, the HRA has not yet been

Significant Industrial Sites (LSIS)		concluded in relation to air pollution. An air quality assessment is currently underway. This assessment will be updated when the HRA is concluded.
	Significant positive	SA18: The policy safeguards Locally Significant Industrial Sites (LSIS) to accommodate potential job growth which will contribute to maintaining and enhancing the vitality and viability of the borough's town centres. It will support and promote LSIS.
	Significant positive	SA19: The policy safeguards Locally Significant Industrial Sites (LSIS) and promotes appropriate development. This will help unlock opportunities to deliver additional floorspace capacity which will contribute towards the achievement of this objective.
	Significant positive	SA20: The policy protects and safeguards Locally Significant Industrial Sites (LSIS) and encourages the delivery of extra additional employment floorspace which will provide local employment opportunities.
Policy 28: Safeguarding and Managing Borough Employment Areas	Uncertain	SA14: The HRA of the Local Plan will determine whether this Local Plan policy will result in an adverse effect on Natura 2000 sites. This policy could potentially contribute to air pollution, however, the HRA has not yet been concluded in relation to air pollution. An air quality assessment is currently underway. This assessment will be updated when the HRA is concluded.
	Significant positive	SA18: The policy safeguards employment land to accommodate potential job growth which will contribute to maintaining and enhancing the vitality and viability of the borough's town centres. It will support and promote Borough Employment Areas.
	Significant positive	SA19: The policy safeguards employment land and promotes development on designated employment areas including Borough Employment Areas. This will help unlock opportunities to deliver additional floorspace capacity which will contribute towards the achievement of this objective.
	Significant positive	SA20: The policy protects and safeguards employment land and encourages the delivery of additional employment floorspace which will provide local employment opportunities.
Policy 29: Approach to Non-Designated Employment Land	Uncertain	SA14: The HRA of the Local Plan will determine whether this Local Plan policy will result in an adverse effect on Natura 2000 sites. This policy could potentially contribute to air pollution, however, the HRA has not yet been concluded in relation to air pollution. An air quality assessment is currently underway. This assessment will be updated when the HRA is concluded.
	Significant positive	SA18: The policy supports development on non-designated employment areas which delivers co-location of other uses including C3, A class uses and social and community infrastructure as well as high quality business space.. This will help maintain and enhance the vitality and viability of the Borough's town centres.
	Significant positive	SA19: The policy protects non-designated employment land as locations for employment by supporting new development that is designed for employment use and which also delivers intensification, consolidation or co-location. the policy addresses key sustainability issues.

	Significant positive	SA20: The policy protects non-designated employment land as locations for employment by supporting new development that is designed for employment use and to accommodate a range of appropriate identified future employment growth sectors. This will contribute to maintaining stable levels of employment in the Borough.
Policy 30: Industrial Masterplan Approach	Uncertain	SA14: The HRA of the Local Plan will determine whether this Local Plan policy will result in an adverse effect on Natura 2000 sites. This policy could potentially contribute to air pollution, however, the HRA has not yet been concluded in relation to air pollution. An air quality assessment is currently underway. This assessment will be updated when the HRA is concluded.
	Significant positive	SA19: Policy 30 should help to prevent the loss of SIL, LSIS and BEA, and could increase the net employment floorspace within the borough through criteria B. Criteria D could also help to improve the quality of employment space available. As proposals must provide upgraded facilities which are fit for purpose.
	Significant positive	SA20: This policy should help to increase the net available employment space within the borough and proposals should be supported by a viability and delivery plan. Existing businesses should also be retained through a Retention and Relocation Strategy. These measures should encourage further stable business development.
Policy 31: Co-location Design Principles	Significant positive	SA19: This policy will allow for the development of residential, retail and food and beverage uses alongside industrial space. This co-location could help to provide a variety of employment space on offer, whilst retaining existing industrial space.
Policy 32: Workspaces	Uncertain	SA14: The HRA of the Local Plan will determine whether this Local Plan policy will result in an adverse effect on Natura 2000 sites. This policy could potentially contribute to air pollution, however, the HRA has not yet been concluded in relation to air pollution. An air quality assessment is currently underway. This assessment will be updated when the HRA is concluded.
	Significant positive	SA18: The policy promotes the provision of offices and flexible workspaces for small and medium sized enterprises in sustainable locations. New office development will contribute to the vitality, viability and vibrancy of the borough's town centres by creating footfall and daytime activity.
	Significant positive	SA19: Specific investment directed through the provision of new workspaces into existing local areas including the Blackhorse Lane Creative Enterprise Zone will help improve the local economy by enabling employment development in appropriate locations. Affordable workspace will also need to be provided, which could help to support business start ups and small companies in particular.
	Significant positive	SA20: The policy promotes the provision of workspaces of varying sizes and it promotes low cost affordable spaces as part of mixed use development. This will contribute to the growth of start-ups, SME's, creative and digital industries which will create new employment opportunities and help to maintain levels of employment in the borough.

Policy 33: Affordable Workspaces	Uncertain	SA19: The provision of affordable workspace in a variety of settings, including town centres, SIL and as part of regeneration schemes should help to improve support for business start-ups within the borough. However, it is unclear how much of such space would be provided, or if all developments would need to include it within future proposals.
	Uncertain	SA20: This policy promotes the provision of affordable workspace within a variety of development types and locations. This could help to support business start-ups, thus indirectly aiding to maintain employment within the borough. However, it is unclear how much affordable workspace would need to be provided in order to comply with the policy.
Policy 34: Local Jobs, Skills, Training and Procurement	Significant positive	SA4: The policy fully supports the achievement of the objective and addresses key sustainability issues. Its primary purpose is to promote access to Waltham Forest residents to a broad range of local jobs, skills and training which has direct links to improving community cohesion and reducing inequalities.
	Significant positive	SA18: The policy supports economic growth and employment opportunities through the creation and promotion of local jobs, skills and training. These all contribute to the achievement of this objective and the relevant key sustainability issues. For example, Criteria D of the policy supports the growth of existing and future start-ups, SME's and businesses. Furthermore, more businesses and employment in the area should increase spending in town centres.
	Significant positive	SA19: The policy supports economic growth and employment opportunities through the creation and promotion of local jobs, skills and training. These all contribute to the achievement of this objective and the relevant key sustainability issues. For example, Criteria D of the policy supports the growth of existing and future business start-ups. SME's and business in key growth sectors
	Significant positive	SA20: The policy fully supports the achievement of the objective and addresses key sustainability issues. Its primary purpose is to promote and support a broad range of employment and training opportunities and requires all development of 25 units or more to provide jobs, skills and training for local residents via Section 106 contributions..
Policy 35 Railway Arches	Significant positive	SA16: The policy fully supports the achievement of this objective and addresses all relevant key sustainability issues as it promotes development of railway arches to create attractive places to work and visit.
	Significant positive	SA19: The policy supports the development of railway arches in the borough where it is not identified SIL, LSIS or BEA that can provide suitable and affordable locations for a range of employment development.

Table 18: Summary of Potential Significant and Uncertain Effects for Promoting Culture and Creativity

Local Plan Policy	Potential Effect	Potential Significant Effects Description
Policy 36: Promoting Culture and Creativity	Significant positive	SA4: The implementation of this policy has the potential for a minor positive impact on this SA objective. The locating "of arts, culture, entertainment and visitor facilities" within central areas of the borough could help to ensure that all are able to access and use these facilities. Current cultural facilities will be maintained, and new developments of this type will also be encouraged. In addition, areas of outside space will be promoted for the use of cultural, recreational and sporting activities.
	Significant positive	SA18: The implementation of this policy has the potential for a significant positive effect on this SA objective. Development proposals concerning "arts, culture, entertainment and visitor facilities" will be focused within district centres. Funding may also be gained to further enhance these facilities. This should promote the town centres and help to make them vibrant places to visit.
Policy 37: Protecting Public Houses (Pubs)	Significant positive	SA17: Public houses have a heritage value to the community with some being registered as an Asset of Community Value and their significance as important local assets will be protected by the implementation of this policy. For this reason, a significant positive effect has been recorded, although this is of low magnitude as not all historic buildings are pubs.
Policy 38: Blackhorse Lane Creative Enterprise Zone	Uncertain	SA14: The HRA of the Local Plan will determine whether this Local Plan policy will result in an adverse effect on Natura 2000 sites. This policy could potentially contribute to air pollution, however, the HRA has not yet been concluded in relation to air pollution. An air quality assessment is currently underway. This assessment will be updated when the HRA is concluded.
	Significant positive	SA16: The creation of Blackhorse Lane Creative Enterprise Zone will help to increase local distinctiveness and the policy supports this achievement. Pockets of creative enterprises could be developed, as the clustering of 'creative, digital and cultural industries' will be encouraged/increased through this policy.
	Significant positive	SA18: The creation of Blackhorse Creative Enterprise Zones (CEZ) will help support, promote and maximise opportunities in cultural and creative industries in this area of the borough which may have a significant positive knock on effect for borough town centres in close proximity to this CEZ.
	Significant positive	SA19: Creative developments will be concentrated in an already established area of creative industry and retail, which has good links to public transport. This should ensure that employment resulting from these developments in the Blackhorse Lane CEZ is in accessible and appropriate locations.

Table 19: Summary of Potential Significant and Uncertain Effects for Distinctive Town Centres and High Streets

<b>Local Plan Policy</b>	<b>Potential Effect</b>	<b>Potential Significant Effects Description</b>
Policy 39: Hierarchy of Centres	Significant positive	SA18: The policy supports the achievement of this objective as it protects and enhances the Borough's network of centres to provide a sustainable distribution of town centre facilities and services which contributes to the promotion of retail investment in town centres.
	Significant positive	SA20: The policy supports the achievement of the objective as its primary purpose is to provide a sustainable distribution of town centre facilities and services to support local communities and also to protect and enhance existing centres. It is therefore considered to have a significant positive effect on helping to maintain stable levels of employment in the Borough.
Policy 40: New Retail, Office and Leisure Developments	Significant positive	SA4: The policy supports the delivery of new developments which includes leisure and cultural/tourism, entertainment, hotel, community and other service uses that is appropriate to the role and function of the particular centre or parade and its catchment. This also supports some key sustainability objectives such as the need to build on the borough's arts, culture and sport strengths and to deliver new facilities across the borough.
	Significant positive	SA18: The policy promotes and supports a mix of retail, leisure and office development which will help retain and develop the Borough's town centres' vibrancy and vitality. It will therefore fully support the achievement of this objective and address key sustainability issues as it seeks to direct new investment into town centres.
Policy 41: Revitalisation, Adaptation and Regeneration in Designated Centres and Parades	Significant positive	SA4: Planning Objective B of the policy promotes the conversion of retail and other commercial premises to appropriate alternative uses such as community uses, leisure and entertainment uses subject to other policies in the plan. Policy Objective E also promotes the development of meanwhile and temporary uses with space provision for art, performance and exhibition as well as for educational and vocational projects and activities.
	Significant positive	SA12: The policy supports development proposals that involve the revitalisation, adaption and regeneration of the borough's designated centres/retail parades and other non-designated areas. It promotes the conversion and adaption of existing buildings to appropriate alternative uses the conversion of vacant commercial floorspace.
	Significant positive	SA18: This policy fully supports the achievement of this objective. For example, it seeks to encourage the development of flexible and adaptable units and establish Business Improvement Districts to create an improved environment for business and secure improvements in town centre performance. A mix of uses on individual sites and across an area will support vitality and viability and encourage investment.

Table20: Summary of Potential Significant and Uncertain Effects for Social and Community Infrastructure

Local Plan Policy	Potential Effect	Potential Significant Effects Description
Policy 42: Managing Changes of Use in Primary Shopping Areas		No potential significant or uncertain effects have been predicted for this policy.
Policy 43: Managing Changes of Use outside Primary Shopping Areas of Designated Centres		No potential significant or uncertain effects have been predicted for this policy.
Policy 44: Managing Changes of Use in Neighbourhood Centres and Local Retail Parades		No potential significant or uncertain effects have been predicted for this policy.
Policy 45: Managing Changes of Use in Non-Designated Areas		No potential significant or uncertain effects have been predicted for this policy.
Policy 46: Evening and Night-time Economy Uses		No potential significant or uncertain effects have been predicted for this policy.
Policy 47: Shopfronts and Signage		No potential significant or uncertain effects have been predicted for this policy.
Policy 48: Social and Community Infrastructure	Significant positive	SA3: New developments will have to contribute to new facilities to ensure the social and community infrastructure within the borough is adequate. This in turn may aid in increasing wellbeing of those living within Waltham Forest.
	Significant positive	SA4: The implementation of this policy may aid in meeting the social and community facility needs of the Borough. New developments will have to contribute to new facilities to ensure the social and community infrastructure within Waltham Forest is adequate.
	Significant positive	SA5: The policy has clear criteria which states that proposals for new or improved social and community infrastructure will be supported if the location is easily accessible by sustainable modes of transport such as walking, cycling and public transport for staff and users.
Policy 49: Education and Childcare Facilities		No potential significant or uncertain effects have been predicted for this policy.

Table21: Summary of Potential Significant and Uncertain Effects for Promoting Health and Well-Being

Local Plan Policy	Potential Effect	Potential Significant Effects Description
Policy 50: Promoting Healthy Communities	Significant positive	SA2: The policy supports proposals that encourages social interaction through the delivery of safe, accessible and inclusive places.
	Significant positive	SA3: There is potential for a significant positive impact on this SA objective through the implementation of this policy as the policy includes a number of criteria which promote the creation of healthy communities such as: ensuring inclusive access to public green and open spaces, sports and recreation facilities; protecting existing allotments and supporting the provision of new food growing spaces; and encouraging child friendly design of places. It also encourages the use of Health Impact Assessments (HIA) in all major applications.
	Significant positive	SA16: The policy encourages social interaction through the delivery of safe, accessible and inclusive places and child friendly design of places which will help establish, maintain and improve local distinctiveness.
Policy 51: Health Impact Assessments	Significant positive	SA3: This policy could help to increase health and wellbeing within the borough as it requires all development meeting the threshold set out below to submit a Health Impact Assessment:  A. All developments of 100 new homes or more  B. Non-residential developments of 10,000sqm or more  C. Proposals for takeaways, betting shops and payday loan shops  Therefore a significant positive effect is predicted for this SA objective.
Policy 52: Making Safer Places	Significant positive	SA2: The policy aims to improve community safety and cohesion by designing out crime. It promotes the design of new development to create safe environments and reduce crime and disorder. For example Criteria A of the policy requires all new development to incorporate principles and practises of 'Designing out Crime' and 'Secured by Design'. Criteria C of the policy promotes safer streets and public realm improvements throughout the borough.
	Significant positive	SA4: The policy aims to improve community safety and cohesion by designing out crime by working with partners to achieve this and by requiring all new development to incorporate principles and practices which design out crime. This will improve community cohesion.
Policy 53: Noise, Vibration and Light Pollution	No potential significant or uncertain effects have been predicted for this policy.	

Policy 54: Hot Food Takeaways	Significant positive	SA2: The implementation of this policy may help to ensure anti-social behaviour which may result from the clustering of hot food takeaways is reduced. Litter and noise associated with these types of developments may also be reduced.
	Significant positive	SA3: This policy may help to increase standard of health within the Borough, by preventing the clustering of hot food takeaway developments. In particular, proposals for new hot food takeaways are not permitted within 400m of the boundary of a nursery, primary school, secondary school, community college or youth facilities, which may aid in preventing young people from using these shops to obtain fast, unhealthy foods in their daily routine. New takeaway businesses will also have to comply with the Waltham Forest Healthier Catering Commitment within 6 months of opening.
Policy 55: Betting Shops and Payday Loan Shops	Significant positive	SA3: The policy considers the health implications raised by betting shops and payday loan shops and the need for them to be carefully managed. It also states that proposals of this nature are not to be located within or close to areas of deprivation.

Table22: Summary of Potential Significant and Uncertain Effects for Creating High Quality Places

Local Plan Policy	Potential Effect	Potential Significant Effects Description
Policy 56: Delivering High Quality Design	Significant positive	SA2: The policy fully supports development proposals which deliver high quality 'safe' design as can be seen in criteria H of the policy which states that development proposals will be supported where they provide appropriate safe and legible physical and visual connections that knit well into surrounding streets, routes and public realm, including where appropriate, neighbouring development proposals. Criteria N of the policy states that development proposals should facilitate inclusive, safe and accessible environments for all.
	Significant positive	SA8: The policy supports the achievement of this objective (SA8) by requiring that all development proposals should implement design measures that increase climate change resilience specifically in relation to microclimate control for example.
	Significant positive	SA13: The policy requires development proposals to 'incorporate high quality landscaping, tree planting and urban greening measures to maximise biodiversity and ecological interest' (criteria I of the policy). Criteria M states that development proposals should provide multi-functional green spaces and criteria O of the policy specifically relates to implementing design measures that increase climate change resiliency.
	Significant positive	SA16: The policy fully supports the achievement of this objective (SA16) and key sustainability issues. In criteria C of the policy it states that 'development proposals should be supported by a clear and robust design rationale based on a sound understanding and analysis of local context and character'. Similarly, criteria D requires that development proposals to reinforce and/or enhance local character and distinctiveness.
Policy 57: Taller and Tall Buildings	Significant positive	SA1: The policy supports new development in the form of taller or tall buildings principally in identified Strategic Locations and Opportunity Sites only. Taller and tall buildings can help optimise the use of land and assist in accommodating the borough's growth and these are likely to include housing provision and new dwellings.
	Significant positive	SA4: This policy supports the achievement of this objective (SA4) and key sustainability issues. For example, criteria A of the policy states that taller and tall building development proposals will be assessed on their location in terms of accessibility to transport interchanges and nearby facilities such as shops, community facilities and other services. This will contribute to achieving key sustainability issues such as 'help to support development of successful neighbourhoods' as well as supporting the achievement of this objective overall.
	Significant positive	SA5: This policy supports the achievement of this objective (SA5) and key sustainability issues. For example, criteria A of the policy states that taller and tall building development proposals will be assessed on specific locational criteria such as proximity to public transport interchanges, walking and cycling networks, and nearby facilities such as shops, community facilities and other services. This will contribute to achieving key sustainability

		issues such as 'help to support development of successful neighbourhoods' as well as supporting the achievement of this objective overall.
	Significant positive	SA12: Supporting text to the policy states how taller and tall buildings can help optimise the use of land in accommodating the borough's anticipated growth over the coming years. The policy requires development proposals for taller and tall buildings to enhance the existing streetscape and to ensure its location is accessible to transport interchanges and nearby facilities and services. This promotes the efficient use of land and buildings.
	Significant positive	SA16: The policy fully supports the achievement of this objective (SA16) and addresses key sustainability issues. Criteria C of the policy states that taller and tall building proposals should contribute positively to their context. This can be particularly challenging in a predominantly low-rise borough like Waltham Forest.
	Significant positive	SA18: The policy promotes tall building proposals if they meet the specific policy criteria. If this is achieved than tall buildings can help maintain and enhance the vitality and viability of the Borough's town centres. As stated in the supporting text to the policy, they can also support legibility at key destinations and become beacons for regeneration to stimulate further investment.
	Significant positive	SA19: The policy fully supports the achievement of this objective. For example, criteria D requires tall building proposals to demonstrate how they support legibility and high quality placemaking in the local area. tall buildings could address several of the key sustainability issues.
Policy 58: Residential Space Standards		No potential significant or uncertain effects have been predicted for this policy.
Policy 59: Residential Amenity		No potential significant or uncertain effects have been predicted for this policy.
Policy 60: Designing Out Crime	Significant positive	SA2: The policy aims to improve community safety and cohesion by designing out crime. It promotes the design of new development to create safe environments and reduce crime and disorder. For example, Criteria A of the policy requires all new development to incorporate principles and practises of 'Designing out Crime' and 'Secured by Design'. Criteria C of the policy promotes safer streets and public realm improvements throughout the Borough.
	Significant positive	SA4: The policy aims to improve community safety and cohesion by designing out crime by working with partners to achieve this and by requiring all new development to incorporate principles and practices which design out crime. This will improve community cohesion.
Policy 61: Advertisements, Hoardings and Signage		No potential significant or uncertain effects have been predicted for this policy.

Table 23: Summary of Potential Significant and Uncertain Effects for Sustainable Transport and Infrastructure

Local Plan Policy	Potential Effect	Potential Significant Effects Description
Policy 62: Promoting Sustainable Transport	Significant positive	SA3: The policy aims to promote sustainable transport and liveable neighbourhoods which are more attractive, accessible, healthy and safe streets, places and neighbourhoods for all residents in the borough. The policy requires all new development to increase the number of trips made by walking and cycling and prioritise road space to do this. It also requires new development to provide legible, prominent and coherent wayfinding for walking and cycling to strategic and local active travel networks as well as green spaces.
	Significant positive	SA5: The policy promotes sustainable transport and requires new developments to increase the number of trips made by walking, cycling and public transport, and improve local connections to these modes and to ensure that neighbourhoods have good connections to public transport. It also supports car club development and cycle hire facilities.
	Significant positive	SA9: Criteria xi of the policy requires that new development must improve air quality and noise pollution by promoting sustainable transport initiatives; and reducing Nitrogen Oxide emissions and exposure of vulnerable people to air pollution.
	Significant positive	SA16: The policy aims to create liveable neighbourhoods for everyone which contribute towards enhancing streets to meet Healthy Streets across the public realm in the borough.
Policy 63: Active Travel	Significant positive	SA3: The policy promotes active travel throughout the borough, specifically, walking and cycling.
	Significant positive	SA4: One of the key sustainability issues for this objective is to help support development of successful neighbourhoods.
	Significant positive	SA5: The policy promotes walking and cycling and improved accessibility by foot and cycle within neighbourhoods.
	Uncertain	SA14: The HRA of the Local Plan will determine whether this Local Plan policy will result in an adverse effect on Natura 2000 sites. The policy could potentially increase recreation on Epping Forest and Lee Valley if networks link up with these sites, however, the HRA has not yet been concluded. This assessment will be updated when the HRA is concluded.
Policy 64: Public Transport	Significant positive	SA5: The policy promotes public transport improvements and requires all development to support, protect and enhance existing and proposed public transport infrastructure (Bus, National Rail, Underground, or Overground network) and its connectivity across the borough.

	Uncertain	SA14: The policy promotes the use of public transport which will improve air quality and consequently could contribute to a minor positive indirect effect on European sites as Epping Forest SAC is under threat due to poor air quality. However, a likely significant effect has been identified in relation to this policy in the Regulation 19 HRA screening because infrastructure developments could potentially cause temporary air quality impacts through construction. The HRA of the Local Plan will determine whether this Local Plan policy will result in an adverse effect on Natura 2000 sites but has not yet been concluded pending the findings of an ongoing air quality assessment. This assessment will be updated when the HRA is concluded.
	Significant positive	SA18: The policy states that development should support and enhance public transport connectivity across the borough which will contribute to maintaining and enhancing the vitality and viability of the Borough's town centre. For example, the policy requires major development to contribute to the delivery of new rail, underground or overground infrastructure and improve local bus networks.
	Significant positive	SA20: Public transport and enhanced public transport will help create new employment opportunities which is likely to encourage economic growth as well as maintaining stable levels of employment in the Borough.
Policy 65 Development and Transport Impacts	Significant positive	SA5: This is an overarching transport policy that sets out the documentation to be submitted with new development proposals, to be prepared in line with current best practice guidance e.g. Transport Assessment, site Travel Plan and Construction Logistics Plan (CLP).
	Significant positive	SA9: The policy fully supports the achievement of this objective and addresses some key sustainability issues as its purpose it to assess, mitigate and monitor transport impacts of development.
Policy 66: Deliveries, Freight and Servicing	Significant positive	SA9: The policy aims to minimise the adverse impacts of freight and servicing and minimise impacts on local transport networks. In Criteria A of the policy it promotes the use of sustainable transport initiatives and zero carbon emission vehicles such as cargo bikes and electric vehicles which will help reduce pollution from road vehicles.
Policy 67: Construction Logistics Plans (CLPs)		No potential significant or uncertain effects have been predicted for this policy.
Policy 68: Managing Vehicle Traffic	Significant positive	SA3: The policy requires that all new residential developments are car-free which will improve air quality and the health and wellbeing of those who live in the borough. It can also increase physical activity. The policy also promotes car clubs in new development which encourages residents to walk, cycle or take public transport.
	Significant positive	SA7: The policy requires that all new residential developments are car free and requires all operational vehicles to be electric vehicles. It promotes the use of sustainable transport modes and thereby reduce CO2 emissions.
	Significant positive	SA9: The policy sets out criteria for effectively managing car use and private car travel which will bring improved air quality and decreased local congestion.

Policy 69: Electric Vehicles	Significant positive	SA7: The policy promotes the use of electric cars where the development provides car parking or increased vehicles on borough's roads and requires for example, new development to provide infrastructure for electric vehicle charging. This will help reduce air quality emissions in the borough.
	Significant positive	SA9: The policy fully supports the achievement of this objective and key sustainability issues as an accelerated up take of electric vehicles and ultra-low emission vehicles will help reduce air quality in the borough.
Policy 70 Utilities Infrastructure	No potential significant or uncertain effects have been predicted for this policy.	
Policy 71:Digital Infrastructure	Significant positive	SA20: The policy is likely to contribute to SA20 as improved digital infrastructure will help create new employment opportunities which is likely to encourage economic growth as well as maintaining stable levels of employment in the Borough. The policy will support existing businesses and new investment, particularly the digital policy and is considered to contribute a potential significant positive effect to helping maintain stable levels of employment.

Table 24: Summary of Potential Significant and Uncertain Effects for Enhancing and Preserving our Heritage

Local Plan Policy	Potential Effect	Potential Significant Effects Description
Policies 72: Designated Heritage Assets	Uncertain	SA17: The policy relates directly to the protection, conservation and enhancement of the Borough's designated non-designated heritage assets and fully supports the achievement of this objective and all relevant key sustainability issues. This is positive, however, as the policy allows for some harm i.e. loss of a designated heritage asset then the overall effect could be uncertain.
	Significant positive	SA18: The policy aims to protect and enhance the Borough's history, identity and sense of place. This supports the achievement of this objective (SA18) and the policy also supports the key sustainability issue as it promotes and permits development which secures optimum viable use of a site along with development which enhances the character or appearance i.e. the vitality of the area.
Policy 73: Listed Buildings	Significant positive	SA16: This policy seeks to protect Listed Buildings and their settings. The specific policy criteria make clear the importance of maintaining and improving local distinctiveness through for example, the reinstatement of historic building features and the respecting the setting of nearby buildings. The policy further states how this work should be carried out using traditional, historic or original material, employing specialist advice and craftsmanship.
	Significant positive	SA17: The policy fully supports the achievement of this objective and would address all relevant key sustainability issues. For example, the policy states that all proposals for Listed Buildings should seek to conserve and enhance significance by retaining, repairing and (where appropriate) reinstate historic features and fabric.

Policy 74 Conservation Areas	Significant positive	SA16: The policy seeks to preserve or enhance the borough's Conservation Areas recognising their special character and historic significance. It also supports the designation (where appropriate and with public consultation) of new Conservation Areas in the borough.
	Significant positive	SA17: The policy fully supports the achievement of this objective as it seeks to conserve or enhance the borough's Conservation Areas.
Policy 75: Archaeological Assets and Archaeological Priority Zones	No potential significant or uncertain effects have been predicted for this policy.	
Policy 76: Non-Designated Heritage Assets	Significant positive	SA16: The policy protects non-designated heritage assets and it states how there will be a strong presumption in favour of their retention and sympathetic maintenance and enhancement.
	Significant positive	SA17: The policy makes it clear how proposals to alter or extend an asset should ensure the character and setting of the building or asset is maintained or enhanced and that any proposals which would involve the demolition of, or drastic alterations to these properties is resisted.
Policy 77: Locally Listed Buildings	Significant positive	SA15: The policy seeks to retain all parks and landscaped public gardens which will help maintain open spaces in the borough.
	Significant positive	SA16: The policy seeks to protect and retain locally listed buildings, recognising their architectural and historic interest that makes them significant to the borough. Any 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. This will contribute to maintaining and improving local distinctiveness and preserving local character and history.
	Significant positive	SA17: The policy seeks to protect and retain locally listed buildings, recognising their architectural and historic interest that makes them significant to the borough. Total loss of locally listed buildings will be strongly resisted.
Policy 78: Highams Area of Special Character	Significant positive	SA17: The policy protects the Highams Area of Special Character which has local architectural and historic significance and any development proposals will be expected to pay close attention to the area's defined character. This will contribute to conserving and enhancing the historic built environment within the Highams Area of Special Character and some key sustainability issues.

Table 25: Summary of Potential Significant and Uncertain Effects for Protecting and Enhancing the Environment

Local Plan Policy	Potential Effect	Potential Significant Effects Description
Policy 79: Green Infrastructure and the Natural Environment	Uncertain	SA14: The HRA of the Local Plan will determine whether this Local Plan policy will result in an adverse effect on Natura 2000 sites. This policy could potentially decrease recreational pressures to European sites, however, it is screened into the HRA because it also encourages connectivity of green infrastructure which could improve access to and present a risk of damage to European Sites. The HRA has not yet been concluded in respect of potential recreational effects. This assessment will be updated when the HRA is concluded.
	Uncertain	SA15: This policy directly refers to the Green Belt and Metropolitan Open Land (MOL), detailing the criteria which development on <u>this</u> land must meet. However, this policy does not entirely rule out future development within the Green Belt and instead relies on "national policy and the London Plan" to prevent development within the area. Therefore an uncertain effect is identified.
Policy 80: Open Spaces, Sport and Recreation	Significant positive	SA15: The implementation of this policy has the potential to cause a significant positive effect on this SA objective. Open space provision would be assessed for new housing development sites, and adequate new space created where this is lacking. Development on parks already existing within the Borough would be prevented, as well as development which could alter the setting of these areas. Facilities surrounding open space would also be encouraged, such as toilets and cafes, which may help to improve the quality of these spaces for those using them.
Policy 81: Biodiversity and Geodiversity	Significant positive	SA14: The implementation of this policy has the potential for a significant positive effect on SSSI and Natura 2000 sites. It aims to ensure the protection of such sites through methods such as a biodiversity survey, and limits harmful developments within these areas. This is expected to aid in the recovery of these sites.
	Significant positive	SA16: This policy has potential to result in a significant positive effect on this SA objective. Through the protection of nationally and locally recognised biodiversity and geological resources, such as Walthamstow Wetlands, Waltham Forest as a borough may be maintained or enhanced as an attractive and distinctive place to live, work and visit.
Policy 82: Trees	Significant positive	SA16: This policy has potential to result in a significant positive effect on this SA objective. Through the retention and protection of significant existing trees with high amenity, historic or ecological/habitat conservation value. This will help to maintain and improve local distinctiveness.
Policy 83: The Epping Forest and the Epping Forest Special Area of Conservation	Uncertain	SA1: This policy seeks to protect Epping Forest and the Epping Forest SAC Natura 2000 sites from potential effects of development. This policy may therefore conflict with the achievement of this SA objective. HRA screening has identified potential significant effects from housing development on the Natura 2000 sites. This will be investigated within the Local Plan HRA which is yet to be concluded.

	Significant positive	SA13: The policy seeks to protect and enhance the natural environment of the Epping Forest and its SAC designation. The policy seeks to ensure that development proposals affecting the Epping Forest SAC must not contribute to adverse impact on ecological integrity.
	Significant positive	SA14: The policy seeks to protect and enhance the natural environment of the Epping Forest and its SAC designation. The policy will protect the designated site from potential effects of development and development that affects the Epping Forest SAC will contribute to the mitigation of adverse effects.
	Significant positive	SA15: The Epping Forest is the largest open space in London. This policy protects this open space and therefore a potential significant positive effect is recorded for this SA objective.
	Significant positive	SA16: The policy seeks to protect and enhance the natural environment of the Epping Forest and its SAC as well as avoid adverse impacts on ecological integrity, amenity and or visitor enjoyment. The implementation of this policy will help to maintain and conserve the local distinctiveness of Epping Forest
Policy 84: Lee Valley Regional Park	Significant positive	SA13: The policy seeks to ensure that development proposals affecting the Lee Valley Regional Park must not contribute to adverse impact on ecological integrity. The policy will contribute to conserving and enhancing the ecological integrity of the Lee Valley Regional Park.
	Significant positive	SA14: The policy seeks to protect and enhance the Lee Valley Regional Park and its SPA designation. The policy will protect the designated site from potential effects of development. Development that could affect the Lee Valley SPA will contribute to the mitigation of adverse effects on the SPA.
	Significant positive	SA15: The Lee Valley Regional Park provides valuable benefits to local communities in terms of access to nature and to healthy outdoor recreation in the borough. This policy protects this open space.
	Significant positive	SA16: The policy seeks to protect the Lee Valley Regional Park and sets out a number of criteria development proposals have to adhere to. The implementation of this policy will help to maintain and conserve the local distinctiveness of Epping Forest.
Policy 85: Protecting and Enhancing Waterways and River Corridors	No potential significant or uncertain effects have been predicted for this policy.	
Policy 86: Food Growing and Allotments	Uncertain	SA14: The HRA of the Local Plan will determine whether this Local Plan policy will result in an adverse effect on Natura 2000 sites. The policy could increase fly tipping of garden waste on European sites which could cause a spread of diseases, however, the HRA has not yet been concluded in relation to this potential effect. This assessment will be updated when the HRA is concluded.

Table 26: Summary of Potential Significant and Uncertain Effects for Ensuring Climate Change Resilience

Local Plan Policy	Potential Effect	Potential Significant Effects Description
Policy 87: A Zero Carbon Borough	Significant positive	SA3: The policy sets a target for all new development to meet or exceed the zero carbon emissions target in line with the London Plan energy hierarchy. This will contribute to improving the standard of health and wellbeing of those who live and work in the borough as it will improve air quality for example.
	Significant positive	SA7: The policy sets out clear carbon reduction and sets out a number of policy criteria which developments should meet to minimise greenhouse gas emissions, maximise energy efficiency and reduce the borough's carbon footprint. For example, Criteria C requires all new development to meet or exceed the zero carbon emissions target in line with the London Plan energy hierarchy. Criteria F requires all developments to achieve a minimum of 35% reduction below Part L on site targeting zero carbon where possible.
	Significant positive	SA8: The policy sets out clear carbon reduction targets and sets out a number of policy criteria which developments should meet to minimise greenhouse gas emissions, maximise energy efficiency and reduce the borough's carbon footprint. For example, Criteria C requires all new development to meet or exceed the zero carbon emissions target in line with the London Plan energy hierarchy. Criteria F requires all developments to achieve a minimum of 35% reduction below Part L on site targeting zero carbon where possible.
	Significant positive	SA11: The policy seeks to minimise greenhouse gas emissions, reduce the borough's carbon footprint and maximise energy efficiency within developments by setting clear carbon reduction targets which will all improve the borough's resilience to climate change and help reduce the risk of flooding.
Policy 88: Decentralised and Renewable Energy	Significant positive	SA7: The policy requires new development to maximise its use of decentralised energy systems which will increase lower carbon heating efficiency and help decrease carbon emissions in the borough. It also requires developers to demonstrate to the LPA's satisfaction why a connection is not feasible or viable if they do not propose to make a connection to an existing or planned network.
	Significant positive	SA8: The policy promotes the adoption of decentralised energy systems and major developments as defined in the policy criteria will be expected to install communal heating systems and connect to decentralised energy networks. It also makes clear that all developments will need to demonstrate to the LPA's satisfaction why a connection is not feasible or viable if they do not propose to make a connection to an existing or planned network. This fully supports the achievement of this objective and key sustainability issues.
Policy 89: Sustainable Design and Construction	Significant positive	SA6: The policy promotes sustainable design and construction, and this includes minimising waste during the construction and operations phases of development as shown in Criteria I. Criteria J of the policy also requires new development to provide a clear strategy of adequate waste and recycling storage and collection facilities.

	Significant positive	SA7: The policy promotes sustainable design and construction and includes a number of criteria that will help reduce greenhouse gas emission and promote low carbon growth. For example, Criteria K of the policy supports the low carbon retrofitting of existing buildings to reduce carbon emissions and Criteria G requires all built development to achieve at least a 35% on site carbon reduction below Part L 2013 of the Building Regulations.
	Significant positive	SA8: The policy promotes and supports low carbon sustainable development and sets out a number of criteria of how the sustainable delivery of development can be achieved.
Policy 90: Air Pollution	No potential significant or uncertain effects have been predicted for this policy.	
Policy 91: Water Quality and Water Resources	Significant positive	SA10: The policy promotes the efficient use of water and requires that new development should prevent any adverse impacts on water quality and water supply. Criteria B of the policy states that new development should introduce water efficiency measures. The policy also recognises how an increasing population will put a strain on water resources and how the council will work collectively with infrastructure providers, Thames Water, Environment Agency and neighbouring boroughs to manage water, waste water and sewage capacity and infrastructure.
Policy 92: Contaminated Land	No potential significant or uncertain effects have been predicted for this policy.	
Policy 93 : Managing Flood Risk	Significant positive	SA11: The policy relates specifically to how development should manage flood risk and sets out a number of criteria of how this can be implemented.
Policy 94: Overheating	Significant positive	SA8: The policy sets out criteria for how overheating can be prevented. For example, Criteria A states how optimising the layout, orientation, materials, technology and design of new development to minimise any adverse impacts on internal and external temperature, reflection, over-shadowing, micro-climate and wind movement. The policy promotes the construction of energy efficient buildings.

Table 27: Summary of Potential Significant and Uncertain Effects for Promoting Sustainable Waste Management

Local Plan Policy	Potential Effect	Potential Significant Effects Description
Policy 95: Waste Management	Significant positive	SA6: The policy specifically relates to the sustainable management of waste and sets out how the borough can achieve this. For example, Criteria D encourages new development to include adequate and well-designed internal and external storage facilities for residual waste and recycling.

Table 28: Summary of Potential Significant and Uncertain Effects for Implementation and Monitoring

Local Plan Policy	Potential Effect	Potential Significant Effects Description
Policy 96: Infrastructure and Developer Contributions		No potential significant or uncertain effects have been predicted for this policy.
Policy 97: Monitoring and Promoting the Achievement of Growth Targets	Significant positive	SA18: The policy monitors and promotes the achievement of growth targets relating to housing, affordable housing, employment space and retail space. The delivery of these developments will contribute to maintaining and enhancing the vitality of the borough's town centres.
	Significant positive	SA19: The policy monitors and promotes the delivery of employment space and sites to ensure the related targets are met. If these sites are delivered it will improve the local economy.
	Significant positive	SA20: The policy monitors and promotes the delivery of employment space and sites to ensure the related targets are met. If these sites are delivered, then it will create employment opportunities that will contribute to maintaining stable levels of employment in the borough.



## 8 Potential Cumulative Effects

This section describes potential cumulative effects which may arise as a result of the proposed Local Plan.

The potential cumulative effects of the spatial realisation of the Local Plan have been identified within the SA of the Site Allocations Document (Local Plan Part 2). Being a strategic plan, the potential cumulative effects which the Local Plan Part 1 could result in relate to effects with other plans and projects, and in particular, growth planned in neighbouring areas (Table 29). Table 30 presents potential cumulative effects resulting from projects coming forward within the Borough.

**Table 29: Potential Cumulative Effects with Other Plans**

Local Authority	Proposed Growth	Potential cumulative effects with Waltham Forest Local Plan
London Borough of Enfield	<p>A new Local Plan is being prepared and reviewed in response to consultation comments received between December 2018 and February 2019. It is predicted that Enfield's population could exceed 400,000 by 2032.</p> <p>The extant Core Strategy<sup>61</sup> plans for growth concentrated in town centres and on previously developed land in the south and east of the Borough. Up to 2026 the plan aims to deliver approximately 11,000 new homes and the number of jobs will increase by a minimum of 6,000. Large scale growth and regeneration will be focused in four broad locations - Central Leeside and North East Enfield in the Upper Lee Valley, the area around the North Circular Road at New Southgate and the Borough's major town centre - Enfield Town.</p> <p>The strategic objectives for Enfield are to strengthen retail, public services and employment, protecting biodiversity, reducing the borough's carbon footprint, enhancing quality of life</p>	<p>The current spatial strategy in Enfield concentrates growth in areas which border Waltham Forest. Ponders End, Meridian Water and Edmonton are all in the east of the Borough of Enfield and could potentially combine with potential effects of growth to the east of LB Waltham Forest such as the North Circular Corridor, Sewardstone Road and North Chingford strategic locations.</p> <p>Traffic levels are high within Waltham Forest and the entire borough is an AQMA. The A110 and A406 (North Circular) in Waltham Forest also pass through Enfield borough. Traffic generated in Enfield may contribute to traffic in Waltham Forest and population growth, despite investment in public transport and aims to create sustainable communities, could potentially exacerbate this. A potential uncertain cumulative effect is therefore identified in relation to SA9 (air quality).</p> <p>The part of the Lee Valley SPA/Ramsar site which is located within LB Waltham Forest Borough is called the 'Walthamstow Wetlands'. Walthamstow Wetlands was opened to the public in 2017 and is London's largest urban wetland nature reserve. Public access to the</p>

<sup>61</sup> The Enfield Plan Core Strategy 2010-2025 Adopted November 2010

Local Authority	Proposed Growth	Potential cumulative effects with Waltham Forest Local Plan
	<p>and living environments and reducing the need to travel, all of which are likely to result in sustainability positive effects.</p>	<p>Wetlands is managed. With growth in both Enfield and within the west of Waltham Forest Borough, there is potential for a cumulative negative effect on the Lee Valley SPA/Ramsar site, but it is too early to tell whether the opening of the site will have any detrimental effect on its integrity. No monitoring data is available yet. Therefore, a significant cumulative effect is identified with regards to SA14 (protect the ecological integrity of SSSI and Natura sites) as well as an uncertain cumulative effect is identified in relation to SA9 (air quality). This is being investigated as part of the HRA of the Local Plan Part 1 which has not yet been concluded in relation to in combination effects.</p>
Haringey	<p>Haringey's development plan is currently made up of the Strategic Policies, Development Management Policies, Site Allocations and Tottenham Area Action Plan, alongside the London Plan. Strategic Policies were adopted by the council in 2013, to replace the Unitary Development Plan (UDP), with subsequent alterations adopted on the 24 July 2017<sup>62</sup>. The plan aims to deliver a minimum 19,800 net new homes over the plan period to 2026. The Council's overall strategy for managing future growth in Haringey is to promote the provision of homes, jobs and other facilities in the areas with significant redevelopment opportunities at, or near, transportation hubs, and support appropriate development at other accessible locations, with more limited change elsewhere.</p> <p>The Tottenham Hale Area of Growth is located to the east of the borough, close to the Lee Valley Regional Park and the boundary with Waltham Forest.</p>	<p>With growth in both Haringey and Waltham Forest there is potential for a significant cumulative negative effect on the Lee Valley SPA/Ramsar site with regards to recreational pressure and water supply.</p> <p>Potential investments and policies to improve walking and cycling in both Haringey and Waltham Forest could help to limit any increase in air pollution which could result from population growth predicted. However, it is not certain that growth in both boroughs would not increase air pollution which could increase nitrogen deposition on the Lee Valley SPA and Ramsar site which lies on the boundary between the two boroughs. Therefore, an uncertain cumulative effect is identified in relation to SA9 (air quality) and potential significant cumulative (in combination) negative effects are identified with regards to SA14 (protect the ecological integrity of SSSI and Natura sites). This is being investigated as part of the HRA of the Local Plan Part 1 which has not yet been concluded in relation to in combination effects.</p>
London Borough of Hackney	<p>On 22 July 2020, the Hackney Local Plan 2033 was adopted. The Local Plan includes an objective to deliver up to 26,250 additional homes and 23,000 new jobs. Mixed used development with residential, employment, retail, leisure and community facilities will be focused in the designated town centres of Dalston and Hackney Central, and in Shoreditch (none of which are close to the boundary with Waltham Forest).</p>	<p>The A104 and A12 pass between the boroughs of Waltham Forest and Hackney. Despite planned investments and policies promoting sustainable development in both boroughs it is possible that traffic could increase with the growth proposed in both boroughs. An uncertain cumulative effect is therefore identified in relation to SA9 (air quality).</p>

<sup>62</sup> Haringey's Local Plan 2013 – 2026 (formerly the Core Strategy) March 2013 consolidated with alterations since 2017

Local Authority	Proposed Growth	Potential cumulative effects with Waltham Forest Local Plan
	<p>New office development will be directed to the most sustainable locations in the Borough, including within the City Fringe Opportunity Area and the borough's Town Centres to support Hackney's economy. Mixed used, housing led development will be encouraged along the borough's key corridors (including Lea Valley Edge which borders Waltham Forest). This development is intended to deliver improvements to the public realm, new community facilities and other measures that promote healthy streets that easily link different neighbourhoods, open spaces public transport hubs, and civic areas by walking and cycling.</p>	<p>With growth in both Hackney and Waltham Forest there is potential for a significant cumulative negative effect on the Lee Valley SPA/Ramsar site in relation to recreation pressure and water supply. An uncertain cumulative effect is identified with regards to SA14 (protect the ecological integrity of SSSI and Natura sites). This is being investigated as part of the HRA of the Local Plan Part 1 which has not yet been concluded in relation to in combination effects.</p>
London Borough of Newham	<p>The Newham Local Plan was adopted in December 2018 to replace the previous Core Strategy and Detailed Sites and policies Development Plan Document. The new plan covers a 15year period to 2033<sup>63</sup>. The Local Plan aims to deliver a minimum of 43,00 new homes by 2033, as well as up to 60,000 new jobs.</p> <p>Development of high density, mixed use and sustainable in terms of location and design are encouraged throughout Newham, but particularly in the following strategic locations:</p> <ul style="list-style-type: none"> <li>(a) Stratford and West Ham</li> <li>(b) Royal Docks</li> <li>(c) Canning Town and Custom House</li> <li>(d) Beckton</li> <li>(e) Urban Newham</li> </ul>	<p>No potential cumulative effects have been identified. The Forest Gate growth area in LB Newham is promoted as a town centre for regeneration by the Newham Local Plan. A total of 7856 new dwellings are required to be developed within urban Newham by 2033, which could lead to increased traffic and demands on public transport. However, the LB Waltham Forest spatial strategy includes strong policies for the strategic locations to the south of Waltham Forest which should help to strengthen these locations (Leyton and South Leytonstone) and discourage residents from travelling south to Forest Gate to access services, facilities and employment.</p>
London Borough of Redbridge	<p>The Redbridge Local Plan was adopted in March 2018. It aims to deliver up to 17,237 new homes across the borough<sup>64</sup>. The Local Plan directs new development including new homes, shops, businesses, leisure facilities and infrastructure to:</p> <ul style="list-style-type: none"> <li>(a) The borough's Investment and Growth Areas of: i Ilford; ii Crossrail Corridor; iii Gants Hill; iv South Woodford; and v Barkingside.</li> </ul>	<p>The South Woodford Growth Area is located within the west of Redbridge borough, close to the boundary with Waltham Forest. So too is the town centre of Wanstead where growth will also be directed.</p> <p>Traffic levels are high within Waltham Forest and the entire borough is an AQMA. The A12 and North Circular roads pass through Redbridge and Waltham Forest boroughs. Traffic generated in Redbridge may</p>

<sup>63</sup> Newham Local Plan, 2018-2033, adopted December 2018

<sup>64</sup> Redbridge Local Plan 2015 - 2030

Local Authority	Proposed Growth	Potential cumulative effects with Waltham Forest Local Plan
	<p>(b)The borough's main town centres.  (c)Other identified Opportunity Sites.</p> <p>The objectives of the Local Plan include increasing energy efficiency, encouraging sustainable patterns of transport, improving access to employment, supporting the strategic industrial Locations in the borough, and protecting conditions for biodiversity.</p>	<p>contribute to traffic in Waltham Forest and population growth could potentially exacerbate this, despite investment in public transport and policies within the Waltham Forest Local Plan to improve air quality. An uncertain cumulative effect is therefore identified in relation to SA9 (air quality).</p> <p>Growth within Redbridge borough could contribute to recreational pressure on the Epping Forest SAC, a part of which is located on the boundary between the two boroughs. This could potentially combine with increased recreational pressure from growth in Waltham Forest. A potential significant negative cumulative (in combination) effect is therefore identified in relation to SA14 (protect the ecological integrity of SSSI and Natura sites). This is being investigated as part of the HRA of the Local Plan Part 1 which has not yet been concluded in relation to in combination effects.</p>
Epping Forest District	<p>The adopted Local Plan is dated 2006. An updated Local Plan has been prepared for the period 2011-2033 (Submission version dated December 2017) which made provision for a minimum of 11,400 new homes through:</p> <ul style="list-style-type: none"> <li>• The creation of Garden Town Communities around Harlow;</li> <li>• Development of previously developed land and some open space land within existing settlements;</li> <li>• Development of previously developed land within the Green Belt; Greenfield/Green Belt land on the edge of settlements;</li> <li>• Development of some grades of agricultural land; and</li> <li>• Development of some smaller sites in rural communities.</li> </ul> <p>Most development is to be directed to Harlow (circa 3,900 new homes), followed by Epping (1305), Loughton (1021), Waltham Abbey (858) and North Weald Bassett (1050).</p> <p>Following examination, the Inspectors report (dated 2<sup>nd</sup> August 2019) concluded that the Local Plan is not currently sound and</p>	<p>The draft spatial strategy in Epping Forest District directs the majority of development to settlements which are not on the boundary with Waltham Forest. Nevertheless, some development is directed to Loughton and Waltham Abbey in the south of Epping Forest District, and smaller scale development may also occur in smaller settlements in that area.</p> <p>Work is underway to further investigate and develop mitigation to address the potential negative effects on the integrity of Epping Forest SAC with regards to air quality and recreation/urbanisation resulting from growth in Epping Forest district. Such effects could potentially combine with the effects of growth in Waltham Forest (and other neighbouring local authorities). Potential significant negative cumulative (in combination) effects are therefore identified in relation to SA14 (protect the ecological integrity of SSSI and Natura sites) and SA9 (air quality).</p> <p>This is being investigated as part of the HRA of the Local Plan Part 1 which has not yet been concluded in relation to in combination effects.</p>

Local Authority	Proposed Growth	Potential cumulative effects with Waltham Forest Local Plan
	<p>requires further major modifications before it can be accepted. Issues include air quality and recreation/urbanisation effects on Epping Forest SAC identified within the plan HRA which require further investigation and mitigation.</p>	
The London Plan, 2019 (intend to publish version)	<p>The London Plan recognises the deprivation within Waltham Forest, and clearly sets out strategy to deal with this. For example, the London Legacy Development Corporation (LLDC), which involves several local authorities having a coordinated response to issues in the area surrounding the Queen Elizabeth Olympic Park.</p>	<p>There is potential for a cumulative positive effect to result from the implementation of the Waltham Forest Local Plan working in combination with the London Plan in relation to SA1 (housing), SA3 (health), SA19 (local economy) and SA20 (employment). Both plans recognise the need to channel investment into Waltham Forest, in order to regenerate areas of the Borough which currently do not adequately serve local people. This is being investigated as part of the HRA of the Local Plan Part 1 which has not yet been concluded in relation to in combination effects.</p>

Table 30: Potential Cumulative Effects with Other Projects

Project	Description	Potential cumulative effects with Waltham Forest Local Plan
Crossrail 1 and Crossrail 2	<p>LB Redbridge will benefit from the first phase of Crossrail which is currently being built. LB Enfield, Haringey and Hackney as well as Waltham Forest will benefit from Crossrail 2 which is currently in the planning stages. There is some uncertainty over the delivery of Crossrail 2 which, if it goes ahead, would be operational in the 2030s. Crossrail 2 will bring opportunities for more economic growth within the boroughs which contain the route and in neighbouring areas such as Waltham Forest, if public transport links to the Crossrail 2 stations can be provided.</p>	<p>Potential significant positive cumulative effects are likely to result from the combination of growth as set out within the Waltham Forest spatial strategy and the Crossrail projects, particularly Crossrail 2, in relation to SA5 (access) and SA20 (employment). Growth directed to the Sewardstone Road and North Circular Corridor/Meridian Water Extension and Blackhorse Lane should benefit from increased accessibility to public transport, increased access to central London, support to the local economy and increased job opportunities. Development toward the south east of the Borough could also benefit from Crossrail 1.</p>
Deephams Sewage Works, Edmonton	<p>From 2017 to 2019, £250 million was invested into the sewage treatment works to expand the service offer to more residents across London. This has been done to achieve a higher effluent quality, as well as decrease odour emissions from the site.</p>	<p>Although just outside Watford Borough, this project has the potential to work in combination with the Waltham Forest Local Plan to positively affect the South West of Waltham Forest.</p> <p>Odour emissions from the site have been decreased, which is likely to improve the living environment of those around Edmonton as well as areas of the Lee Valley, such as William Girling Reservoir. The quality</p>

		<p>of effluent emitted into the River Lee will be comparably better compared with before the works were completed, which is likely to improve both the river itself as well as the environment surrounding it. This may enhance local open space within Waltham Forest.</p> <p>Invasive species management has been carried out in the areas such as Japanese knotweed, which should help to prevent the spread of such species within Waltham Forest. Hence, a potential positive cumulative effect has been identified in relation to SA10 (water), SA9 (air quality) and SA13 (biodiversity and geodiversity).</p>
North London Heat and Power Project	<p>The North London Heat and Power Project is a decade long project to create a plant able to deal with non-recyclable waste through combustion, to produce low carbon energy in the form of heat and steam.</p>	<p>This Edmonton based project borders the West of Waltham Forest Borough, close to the Lee Valley Regional Park. This project may work in combination with the Waltham Forest Local Plan in order to positively affect several of the SA objectives:</p> <ul style="list-style-type: none"> <li>- Climate change resilience (SA7) may be improved through the reduction in carbon emissions related to waste management;</li> <li>- Air quality improvement (SA9) is a key objective of this project, which is likely to improve the nearby air quality in nearby Boroughs such as Waltham Forest;</li> <li>- 2,500 jobs created through the construction of the plant could help to employ those living within Waltham Forest (SA20).</li> <li>- 325 local apprenticeships and skills training opportunities could provide local education for young people (SA20).</li> <li>- The environment surrounding Edmonton may be improved by this project, thus the air quality in the Lee Valley Regional Park could be improved. Not only would the environment be improved, but so would the quality of open space available to those living within Waltham Forest (SA9, SA13 and SA15).</li> <li>- Waste management needs will also be met for residents in areas surrounding the project (SA6).</li> </ul>

## 9 Mitigation Measures

Mitigation put forward in the SA at Regulation 18 stage has been considered by LBWF officers and incorporate into the policies for the Regulation 19 stage (Local Plan Part 1).

This section details mitigation for any residual uncertain and significant negative effects of the Local Plan Part 1 – Regulation 19 policies.

Uncertain effects relating to SA14 in relation to the following policies due to potential effects which are being investigated in the HRA.

- Policy 2: Scale of Growth;
- Policy 3: Infrastructure for Growth;
- Policy 8: Character-Led Intensification;
- Policy 9: South Waltham Forest;
- Policy 10: Central Waltham Forest;
- Policy 11: North Waltham Forest;
- Policy 12: Increasing Housing Supply;
- Policy 17: Redevelopment and intensification of existing housing and housing estates;
- Policy 19: Small Sites;
- Policy 23: Gypsies and Travellers;
- Policy 25: Supporting and boosting economic growth and local jobs creation;
- Policy 26: Safeguarding and Managing Strategic Industrial Locations (SIL);
- Policy 27: Safeguarding and Managing Local Significant Industrial Sites (LSIS);
- Policy 28: Safeguarding and Managing Borough Employment Areas;
- Policy 29: Approach to Non-Designated Employment Land;
- Policy 30: Industrial Masterplan Approach;
- Policy 32: Workspaces;
- Policy 38: Blackhorse Lane Creative Enterprise Zone;
- Policy 63 Active Travel;
- Policy 64 Public Transport;
- Policy 79: Green Infrastructure and the Natural Environment; and
- Policy 86: Food Growing and Allotments.

The HRA of the Local Plan will determine whether these policies, in combination with other policies within the Local Plan, could result in adverse effects on Natura 2000 sites. Mitigation required to avoid potential negative effects in relation to SA14 will be put forward within the HRA. Once the HRA has been concluded the SA can be updated.

Mitigation measures put forward for other residual significant negative or uncertain effects are listed within Table 31.

**Table 31: Proposed mitigation measures for the Local Plan Part 1 – Regulation 19**

<b>Theme</b>	<b>Policy</b>	<b>Explanation and Mitigation Measures to Minimise or Avoid Effects</b>
North Waltham Forest	11	SA11: FRA is required to demonstrate that 900 homes can be delivered within the North Circular Corridor strategic location without increasing flood risk.
Decent homes for everyone	12	SA11: FRA is required to demonstrate that 27,000 homes can be delivered by 2035 within the plan area without increasing flood risk.
	18	SA12: To enhance the sustainability performance of the policy, the policy wording could make it clear that the development of brownfield land is favoured over greenfield land.
	19	SA12 and SA15: To enhance this policy in relation to SA12 it is recommended that the policy specifies that infill development applies to brownfield land rather than greenfield land. Similarly, the policy should make reference to greenbelt land and open spaces to support SA15, thus mitigating any potential negative effects. Policies 84: Green Infrastructure and the Natural Environment, Policy 85: Open Spaces, Sport and Recreation and policy 86: Biodiversity and Geodiversity should also help to prevent the development of key greenfield sites.
Building a Resilient and Creative Economy	33	SA19 and SA20: the provision of a percentage of affordable workspace to be included in the policy would remove the uncertainty identified in the assessment.
Enhancing and Preserving our Heritage	72	SA17: No mitigation has been identified for the uncertain effect on heritage assets resulting from these policies. As the policy allows for some development of such assets within the borough to occur, it is not fully understood how the heritage of Waltham Forest as a whole may be affected.
Protecting and Enhancing the Environment	79	SA15: There is potential for a significant negative effect on SA15 to arise due to a lack of clear criteria setting out which circumstances development could be permitted under; this could result in the permanent loss of greenfield and Green Belt land, which could not be mitigated. Currently, the London Plan, which this policy appears to rely on for deciding development, will allow it if the development fits the Local Plan policies. This could lead to confusion as well as the development of areas which are not best suited, or which could be irreversibly changed. Clearly stating the other policies to which this policy refers would add clarity to the policy and could prevent the permanent loss of greenfield and Green Belt land.
	83	SA1: The Local Plan HRA identifies mitigation required to ensure that housing development can be delivered in a way which avoids adverse effects on Natura 2000 sites. The SA will be updated once the HRA is concluded.

Enhancement measures to improve the performance of some policies are included within the assessment matrices within Appendix C.

## 10 Proposed Monitoring Arrangements

The SEA Regulations require monitoring of the significant environmental effects of implementing the Waltham Forest Local Plan. Monitoring should cover the significant economic and social effects, as well as the environmental ones.

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

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

- Insufficient sites coming forward for housing and/or employment development due to difficulties in land assembly and development viability, the consequence of which being that housing and employment delivery fall behind the projected trajectory and the Borough fails or is likely to fail to 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.

Appendix 5 of the Local Plan Part 1 'Monitoring Indicators and Targets' sets out the performance indicators and targets by which the progress of the plan will be monitored. All of the Local Plan Indicators set out within Appendix 5 of the Local Plan part 1 will provide information in relation to the sustainability effects of the plan. In monitoring outcomes, a proactive approach will be used by LBWF. Where necessary, new indicators will be created and obsolete indicators will be deleted or amended to meet changing circumstances in the way data is collated.

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

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



## 11 Next steps

This SA Report is being published for consultation for a 7-week period.

Following consultation on both this SA report and the Proposed Submission Local Plan (LP1), comments received on both will be considered. Any necessary changes will be made to the SA Report and to the Local Plan (LP1) in response to consultee comments and shown in the submission of the Local Plan.

The submission version of the Local Plan is expected to be published in Spring 2021 and this will be accompanied by an updated version of the SA Report (see Table 32). An SA adoption statement will be prepared to be published when the Local Plan is adopted.

Table 32: Waltham Forest Local Plan Timetable

Local Plan Activity	Timeframe
Consultation on Local Plan Part 1 - Regulation 19 Preferred Options (Proposed Submission Plan)	October to December 2020
Consultation comments considered	Q1 2021
Submission	Q1 2021
Examination	Q2 2021
Adoption	Q4 2021