

# London Borough of Waltham Forest Local Development Framework **Core Strategy Proposed Submission Sustainability Appraisal Report**

Final  
December 2010



## Revision Schedule

### Sustainability Appraisal Report December 2010

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# 1 Introduction

## 1.1 Background

- 1.1.1 London Borough of Waltham Forest (LBWF) is in the process of preparing a Local Development Framework (LDF) to guide development in the Borough. The LDF will be composed of a number of Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs).
- 1.1.2 Scott Wilson has been commissioned by Waltham Forest Council to undertake an independent Sustainability Appraisal (SA) of the Core Strategy Proposed Submission document, which is a component of the Borough's emerging LDF.
- 1.1.3 The Core Strategy will set out the overarching planning framework for the Borough up to 2026. It will set out the long-term vision for the Borough and identify the broad locations, scale and type of development and supporting infrastructure (such as schools and road improvements) that will take place. It will include policies on issues such as new homes, jobs and the environment.

## 1.2 Sustainability Appraisal and Strategic Environmental Assessment

- 1.2.1 SEA and SA is a process by which the environmental, social and economic effects of a strategic action (a plan or a programme) are considered prior to its implementation. The purpose of undertaking this exercise is to identify the likely effects of the plan or programme in advance so that adverse effects can be minimised and beneficial effects can be enhanced.
- 1.2.2 Chapter 2 provides further details on why SA/SEA is required and how it is undertaken. Chapter 3 explains how SA/SEA has contributed to the plan making process in Waltham Forest and outlines the future steps in the production of the Core Strategy.

## 2 Methodology

### 2.1 Sustainability Appraisal (SA)

2.1.1 Under the Planning and Compulsory Purchase Act (PCPA) (2004), all DPDs produced by local authorities, as part of their LDF must undergo SA. The Core Strategy is a DPD and is one of the documents that sits within the LDF, and so is subject to SA.

2.1.2 SA involves the identification and evaluation of the DPD's impacts on economic, social and environmental objectives – i.e. its compatibility with the three dimensions of sustainable development. The SA process incorporates the requirements of a European law requiring certain plans and programmes to undergo a formal Strategic Environmental Assessment (SEA).

### 2.2 Strategic Environmental Assessment (SEA)

2.2.1 SEA involves the systematic identification and evaluation of the environmental impacts of a strategic action (e.g. a plan or programme). In 2001, the EU legislated for SEA with the adoption of Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the 'SEA Directive'). The Directive entered into force in the UK on 21 July 2004 and applies to a range of English plans and programmes including DPDs.

2.2.2 SA and SEA are therefore both statutory requirements. The Government's approach to this dual requirement is to incorporate the requirements of the SEA Directive into the SA process. The SA, which considers all three pillars of sustainability, therefore incorporates the requirements of the SEA Directive. The Government published guidance on undertaking SA of spatial plans ('the Guidance') in November 2005<sup>1</sup>. This Guidance has now been replaced by the Plan Making Manual (PMM) published by the Planning Advisory Service (PAS) in 2009. The combined SA/SEA process is referred to in the Guidance and in this document as 'Sustainability Appraisal (SA)'.

### 2.3 Compliance with the SEA Directive

2.3.1 The table below sets out the required content of the Environmental Report as defined in the SEA Regulations and details how these have been met in this SA Report.

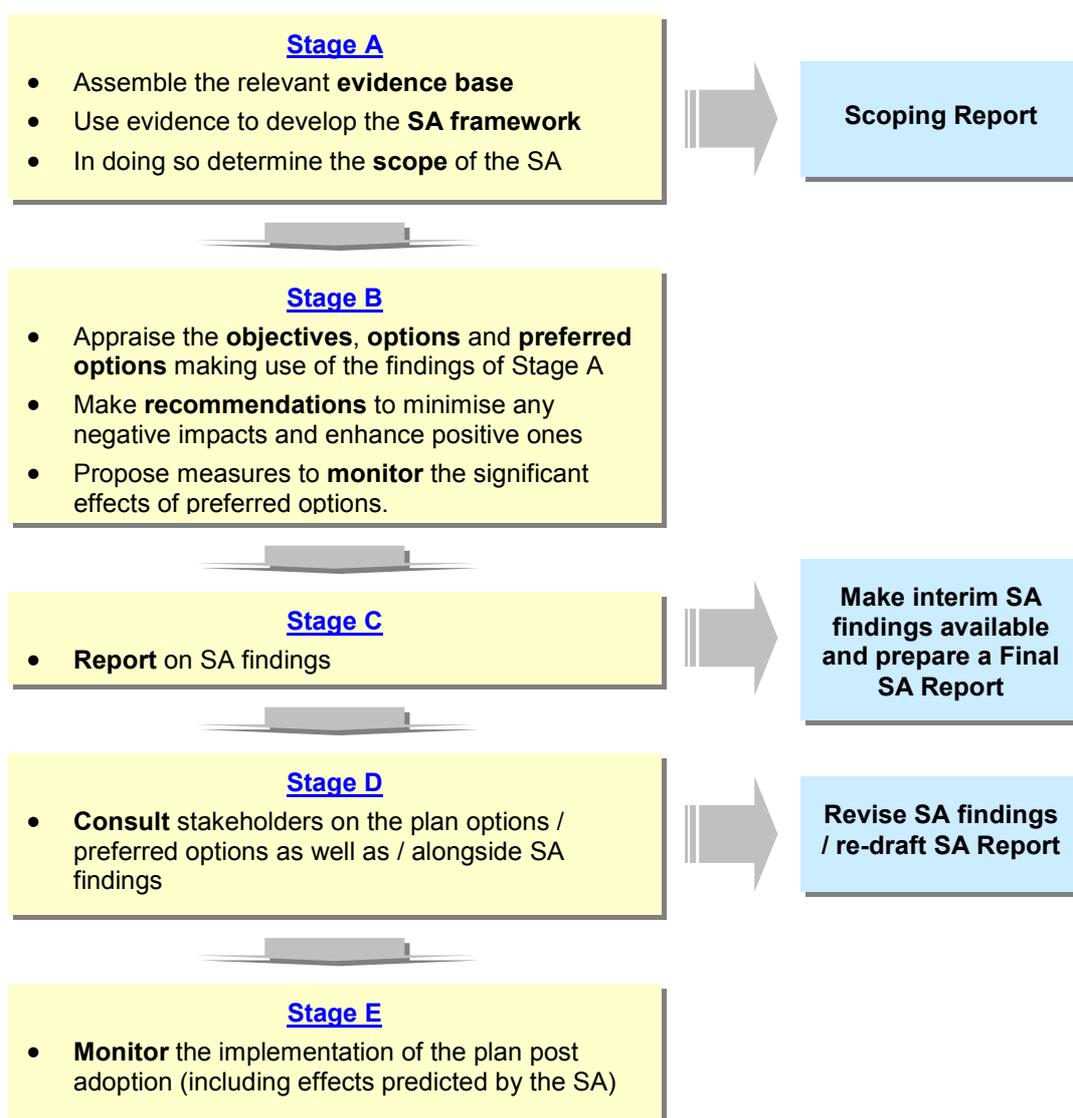
Requirement	Where Covered
An outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes	Chapter 3 and Context Review in Chapters 4 to 18
The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme	Baseline in Appendix 3 and Likely Future Conditions in Chapters 4 to 18
The environmental characteristics of areas likely to be significantly affected	Baseline in Appendix 3

<sup>1</sup> Office of the Deputy Prime Minister (2005) Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents <http://www.communities.gov.uk/documents/planningandbuilding/pdf/142520.pdf> [accessed 06.11.09]

Requirement	Where Covered
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	Context Review in Chapters 4-18 and Baseline in Appendix 3
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	Environmental Protection Objectives in Chapters 4 to 18
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, landscape and the interrelationship between the above factors	Policy Appraisal in Chapters 4 to 18 and Cumulative Effects in Chapter 19
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	Proposed Mitigation summarised in Chapter 19
An outline of the reasons for selecting the alternatives dealt with, and 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	Chapter 2: Methodology and
A description of the measures envisaged concerning monitoring in accordance with Article 10	Proposed Monitoring in Chapter 19.
A non-technical summary of the information provided under the above headings	Separate document

## 2.4 The SA process

2.4.1 The Guidance advocates a five-stage approach to undertaking SA (see **Figure 2.1**).



**Figure 2.1: Five-stage approach to Sustainability Appraisal**

### Stage A

2.4.2 The purpose of Stage A is to define the scope and level of detail of the assessment. This includes the identification and review of relevant international, national, regional and local plans and programmes that might influence the LDF, and from which sustainability objectives can be derived, and the collection of baseline data, along with trend data where appropriate, to inform the identification of key sustainability issues.

2.4.3 The output of Stage A is the production of a Scoping Report, which is subject to public consultation. The Scoping Report outlines the identified key sustainability issues for the Borough in light of the baseline data collated. It also sets the Sustainability Framework, which includes the Sustainability Objectives that were developed in the context of the identified issues and other relevant plans and programmes.

2.4.4 A Scoping Report for the SA of the Waltham Forest LDF was produced in July 2006 and was subject to consultation with the statutory consultees<sup>2</sup>. In light of the time lapse between the

<sup>2</sup> The Environment Agency, Natural England and English Heritage

production of the Scoping Report and the development of the Issues and Options for the Core Strategy DPD, and the potential for a change in the baseline situation in the Borough, the Council felt that it would be pertinent to revise and update the Scoping Report to reflect any such changes.

2.4.5 The Revised Scoping Report builds on the original Report and updates the baseline data and relevant plans and programmes to ensure that the key sustainability issues identified reflect the current situation. The sustainability objectives have also been updated in the context of the identified issues to reflect these changes. The environmental protection objectives, context review and baseline sections of the Scoping Report are replicated in this document (the baseline data is included within Appendix 3).

2.4.6 The Scoping Report is available in full to download from the Council's website at: <http://www.walthamforest.gov.uk/index/environment/planning/planning-policy/local-dev-framework/ldf/ldf-core-strategy-background.htm>

### **Baseline Data**

2.4.7 Baseline data was collated and reviewed in order to establish the baseline conditions against which the implementation of the LDF documents can be assessed. The review sought to establish:

- The current situation and whether trends indicate that the situation is improving or getting worse;
- The current situation in relation to established thresholds or targets;
- Whether any particularly sensitive or important elements of the Borough are likely to be affected;
- The practicality of improving the current situation in light of the type of effects experienced e.g. temporary or permanent effects; reversible or irreversible effects; and
- Whether there have been any significant cumulative or synergistic effects over time and if there might be such effects in the future.

### **Data Gaps and Associated Problems**

2.4.8 An important feature of the compilation of baseline data is the identification of any gaps in the data or any difficulties encountered when collating the information. This is especially important when identifying indicators by which to monitor whether the Sustainability Objectives are being achieved as any difficulties in collating data could render monitoring ineffectual.

2.4.9 An important issue when collating data is the geographical extent at which the data is collected. Although a great deal of data is collected at the Borough level there are some types of data where information is not collected at this scale. For example water quality is sampled for rivers and streams that may cross the boundaries of Boroughs and Districts. Certain data sets are only available at a national scale. Using national level data makes establishing the baseline and trends in the Waltham Forest area more problematic as it is possible that conditions in the Borough are not replicated at a national level, or are to a greater or lesser extent.

2.4.10 A further issue relating to data collation is the continuity of data over time and the reliance upon external agencies for such data. A great deal of data is collected by external agencies and therefore reliance is placed upon these agencies for such data. However, such agencies determine what data is collected and the timescales for data collection. This can be an issue if

there are changes in the way data is collected or the level at which data is collected as this can have implications for the continuity of monitoring.

**The SA Objectives**

2.4.11 The Scoping Report sets the Sustainability Framework, which includes the Sustainability Appraisal Objectives (SA Objectives) that were developed in the context of the identified issues and other relevant plans and programmes. Table 2.1 below outlines the SA Objectives for the Waltham Forest LDF:

**Table 2.1: SA Objectives for London Borough of Waltham Forest LDF**

SA Objective
<b>SOCIAL</b>
<ol style="list-style-type: none"> <li>1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings</li> <li>2. Reduce crime and the fear of crime</li> <li>3. Improve standard of health and wellbeing of those who live and work in the Borough</li> <li>4. Increase the provision of and access to community facilities to meet local cultural, recreational and social needs</li> <li>5. Improve educational attainment in schools</li> <li>6. Improve opportunities for access to education and training for all residents</li> <li>7. Reduce the overall level of deprivation</li> <li>8. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system</li> </ol>
<b>ENVIRONMENTAL</b>
<ol style="list-style-type: none"> <li>9. Reduce production of waste and increase recycling</li> <li>10. Reduce greenhouse gas emissions</li> <li>11. Conserve energy</li> <li>12. Improve air quality through a reduction in traffic-based emissions</li> <li>13. Improve water quality and ensure the efficient use of water resources</li> <li>14. Reduce the risk of flooding</li> <li>15. Reduce contamination and safeguard soil quality and quantity</li> <li>16. Make the best use of previously developed land (PDL) and existing buildings</li> <li>17. Conserve and enhance biodiversity</li> <li>18. Protect the ecological integrity of Natura 2000 sites</li> <li>19. Maintain and enhance the quality of the green belt and open space areas.</li> <li>20. Conserve and enhance the historic built and natural environment</li> </ol>
<b>ECONOMIC</b>

SA Objective
21. Maintain and enhance the vitality and viability of the Borough's town centres
22. Improve the local economy by attracting inward investment
23. Maintain stable levels of employment in the Borough



### Stage B and C

- 2.4.12 This SA Report documents Stages B and C of the SA process. The proposed submission policies have been appraised and recommendations have been made to enhance beneficial effects and minimise adverse ones. Measures have been proposed to monitor the effects.
- 2.4.13 This report can be read in conjunction with the Scoping Report which sets the context within which the appraisal has been undertaken; relevant portions of the Scoping Report baseline and context review have been reproduced herein. It can also be read in conjunction with the Preferred Options SA report which accompanied the Preferred Options Consultation held in January 2010.

### Stage D

- 2.4.14 Following consultation on the Core Strategy Proposed Submission document the Council will submit the Core Strategy to the Secretary of State. This Report has been produced to fulfil the requirements of the 'Environmental Report' as defined by the SEA regulations. A SA Statement will be produced for submission.

### Stage E

- 2.4.15 Stage E of the process (monitoring) will be undertaken by the Council following adoption of the Core Strategy. The appraisal findings sections of Chapters 4 – 18 report on the findings of the appraisal of the policies. This is followed by a section on Monitoring that outlines the indicators considered relevant to enable the Council to effectively identify whether each policy is contributing towards achieving sustainable development. A final list of monitoring indicators will be published in the SA Statement following adoption of the Core Strategy.

## 2.5 Appraisal of the Core Strategy Proposed Submission Policies

- 2.5.1 The general method adopted when undertaking the appraisal was to compare each proposed submission policy with the equivalent statutory development plan policies currently in force in Waltham Forest Borough and the Preferred Options Consultation policies.
- 2.5.2 Where the policy proposed little or no change to the existing policy it was assumed that it would do little or nothing to affect the trends in relevant sustainability variables. In such cases no effects were recorded.
- 2.5.3 Where a change of policy was proposed, the effects of this were assessed in terms of the nature of its impacts (positive/negative/neutral/uncertain) and of its relative magnitude and duration over time. These criteria were then used to judge whether the resulting effect would be minor or significant. This assessment is reproduced in Appendix 4.

2.5.4 The symbols used in the assessment are as follows:

Impact	Symbol
Major positive	++
Positive	+
Major Negative	Xx
Negative	X
Neutral (no affect identified)	-
Uncertain	?

## 2.6 The Sustainability Appraisal Report

2.6.1 The SEA Regulations require the assessment of the likely significant environmental effects of the plan or programme on issues such as:

- Air
- Biodiversity (including flora and fauna)
- Climate
- Cultural heritage
- Human health
- Landscape
- Material assets
- Population
- Soil
- Water
- And the interrelationship between the above factors

2.6.2 The SA process extends the assessment process to include likely significant social and economic effects of the topics listed above to include social and economic factors such as the economy, employment and skills, transport and accessibility and crime and safety.

2.6.3 This SA Report includes a chapter on each of the above sustainability topics. Each chapter is structured in a series of themes, as follows:

- Introduction;
- Context Review;
- Environmental Protection Objectives (where applicable);
- Likely Future Conditions;
- Environmental and Sustainability Issues;
- Relevant SA/SEA Objectives;
- Appraisal findings - likely significant effects and likely minor effects of the policy option;
- Proposed recommendations - recommended measures to minimise adverse effects or enhance beneficial effects; and
- Proposed monitoring - recommended ongoing monitoring of significant effects.

## 3 Producing a New Development Plan for Waltham Forest

3.1.1 A LDF is a folder of DPDs and SPDs that together outline the approach to planning that will be followed within a local authority area. DPDs are the key statutory documents within the LDF and set out the statutory policies for the Borough. The purpose of SPDs is to provide detail to support policy in higher level DPDs. As it is completed the Waltham Forest LDF will gradually replace the existing adopted Unitary Development Plan (UDP) (2006) which currently guides development in the Borough.

3.1.2 The current statutory development plan in Waltham Forest comprises:

Plans	Existing/emerging plan
Waltham Forest Unitary Development Plan (UDP)	Existing
The London Plan	Existing (Partly replaced)
Waltham Forest LDF - The Waltham Forest Core Strategy	Emerging
North London Joint Waste Plan DPD	Emerging

### The Core Strategy

3.1.3 The Core Strategy is the central part of the LDF and is the broad, overarching document that sets out the key policies to guide future development in the Borough. The Core Strategy will be used to guide the location and scale of future development in Waltham Forest over the next 15 years (up to 2026). Waltham Forest will use the Core Strategy when they are making decisions on planning applications. The Council will also use it when they are producing other more detailed local development documents in the LDF.

3.1.4 The timetable for the production of the Core Strategy is as follows:

Key Milestone	Timescale
Public participation on the Preferred Options and the SA Report	January – February 2010
Consideration of representations and discussions with community and stakeholders, preparation of Core Strategy Proposed Submission document	November 2009 – October 2010
Publish Core Strategy Proposed Submission document	January 2011
Submission of the Core Strategy, SA Report and the Proposals Map to the Secretary of State	May 2011
Examination/ Hearing Sessions	Summer 2011
Receipt of Inspector's binding report	Autumn 2011
Adoption and publication of the Core Strategy and Proposals Map	By December 2011

- 3.1.5 This SA Report will go out for consultation alongside the Council's Published Core Strategy consultation document. The SA Report sets out the process followed in the SA, the methods used and conclusions reached, together with proposed mitigation and monitoring measures.
- 3.1.6 The consultation documents will be sent to a number of statutory bodies, including Natural England, Environment Agency and English Heritage, along with adjoining local authorities. They will also be sent to local organisations and stakeholders with an interest in the implementation of the LDF. The documents will be made available to the wider community through their publication on the Waltham Forest Borough Council web pages.
- 3.1.7 The comments received as a result of the consultation will be forwarded to the Planning Inspectorate for consideration at the Hearing in Summer 2011.

**Strategic Objectives of the Core Strategy**

- 3.1.8 The strategic objectives of the Core Strategy have been revised slightly since the Preferred Options stage. The key objectives of the Core Strategy are as follows:

	Strategic Objective
SO1	Capitalise on redevelopment opportunities to secure physical, economic and environmental regeneration of the borough and ensure the delivery of key benefits for the wider community.
SO2	Ensure a continuous supply of land and homes to meet a range of housing needs including affordable housing, family housing and accommodation needs of specific groups within the community, whilst offering a range of housing choices which are of high quality in the right places.
SO3	Facilitate sustainable economic growth by safeguarding and enhancing an appropriate range of sites and premises to meet the demands of local businesses and growth sectors in order to attract and retain high quality services, industries and well paid jobs in the Borough while ensuring residents are able to access them.
SO4	Ensure the timely delivery of appropriate social infrastructure, to strengthen the community, and reduce existing deprivation in the Borough.
SO5	Ensure high environmental standards of development and sustainable resource management and efficiency to support the long term sustainability of our environment and respond to climate change in a practical and effective way.
SO6	Protect, enhance and further develop a network of multifunctional green infrastructure capable of delivering a comprehensive range of benefits for both people and wildlife. Achieve a reduction in areas of deficiency in access to nature and seek to protect and enhance biodiversity across the Borough.
SO7	Ensure that waste is managed in the most environmentally friendly way in order to protect human health and the environment by producing less waste, re-using waste and recycling it and thereby contribute to an efficient use of resources.
SO8	Ensure Waltham Forest is a safe, vibrant and healthy place to live and work by enhancing connectivity across the borough, facilitating regeneration and growth in

	Strategic Objective
	a sustainable manner, minimising congestion and pollution, and providing a range of attractive travel options to access to jobs, opportunities and facilities within the borough and beyond.
SO9	Provide a quality of education and vocational training that ensures that the young people of the Borough can capitalise on the opportunities in Waltham Forest and London, and are able to succeed and prosper now and in the future.
SO10	Reduce inequalities, unemployment and worklessness in the Borough by improving skills, training and employment opportunities and access to jobs.
SO11	Increase the attraction of the area as a tourist destination, based on its unique assets, and the opportunities offered as one of the host boroughs of the 2012 Olympic Games.
SO12	Conserve and enhance the borough's built heritage assets whilst maximising their contribution to future economic growth and community well-being.
SO13	Improve the health and well-being of Waltham Forest residents by positively influencing the wider and spatial determinants of health, such as physical activity, pollution and food choices.
SO14	Safeguard and strengthen the function of Walthamstow Town Centre, the District and Neighbourhood Centres capitalising on their respective roles for shopping, culture, leisure, tourism, housing and employment etc, and ensuring they continue to develop as vibrant, attractive, distinctive, safe and welcoming places.
SO15	Create positive and inclusive environments (buildings and spaces) of high quality that contribute to the distinctiveness of Waltham Forest's neighbourhoods.
SO16	Ensure that Waltham Forest is a safer, more accessible and inclusive place where people want to live, work and visit and where anti-social behaviour, crime and the fear of crime no longer reduces the quality of people's lives.

- 3.1.9 The compatibility of the SA Objectives versus the Core Strategy objectives has been appraised again due to the addition and revision of a number of Objectives since the Preferred Options stage. The appraisal can be found in Appendix 2.
- 3.1.10 The Core Strategy Objectives and Sustainability Appraisal Objectives are generally compatible, where there is a discernible relationship between them. An analysis of their compatibility indicates that there are two instances where there is a potential conflict; both instances involve Core Strategy Strategic Objective 11: Increase the attraction of the area as a tourist destination, based on its unique assets, and the opportunities offered as one of the host boroughs of the 2012 Olympic Games.
- 3.1.11 The first incompatibility is with SA Objective 2: Reduce crime and the fear of crime. It is considered that there is the potential for conflict as increased tourism can be associated with increased levels of certain types of crime e.g. robbery/theft. Therefore increasing the attraction of the area as a tourist destination has the potential to increase the levels of some types of crime.

- 3.1.12 The second incompatibility is with SA Objective 18: Protect the ecological integrity of Natura 2000 sites. Increasing the attraction of the area as a tourist destination based on its unique assets, with one such asset being the Natura 2000 sites within the borough, has the potential to increase the exposure of the Natura 2000 to recreational pressure and the damage/degradation which can result from such pressure. It is therefore considered that increasing the attraction of the area as a tourist destination could have detrimental effects on the ecological integrity of Natura 2000 sites within the borough as a result of the potential for more people to visit the sites.
- 3.1.13 There are two instances where the compatibility of Objectives is dependent upon their implementation; both instances involve Sustainability Appraisal Objective 20: Conserve and enhance the historic built and natural environment.
- 3.1.14 The first instance relates to Strategic Objective 1: Capitalise on redevelopment opportunities to secure physical, economic and environmental regeneration of the borough and ensure the delivery of key benefits for the wider community. Although SO1 references environmental regeneration it is unclear whether redevelopment opportunities to secure regeneration will offer opportunities to conserve and enhance the historic built environment. It will be very much dependent upon the location and details individual sites as to whether redevelopment can offer such benefits to the historic environment and the weight afforded to potential conflicts between economic regeneration and the local historic environment.
- 3.1.15 The second instance relates to Strategic Objective 5: Ensure high environmental standards of development and sustainable resource management and efficiency to support the long term sustainability of our environment and respond to climate change in a practical and effective way. Again, the implementation of this Objective will be very much dependent upon individual sites and locations and the weight afforded to the historic environment. The practicalities of adapting to climate change could potentially conflict with conserving and enhancing the historic environment and therefore individual sites will need to be considered on their own merits.
- 3.1.16 The analysis of the compatibility of the Objectives indicated that the rest of the Objectives are compatible, where a relationship exists. However, it is evident that there are some Objectives for which few relationships with other Objectives are apparent. This is due to the nature of the objectives and the fact that they are very specific in what they aim to achieve.

## 3.2 Options Generation and Testing

### Options Generation

- 3.2.1 The generation and testing of options is a process that is central to the preparation of DPDs. An option or alternative is an approach that may be selected. Planning Policy Statement 12: Local Spatial Planning requires that a DPD must be the most appropriate strategy when considered against the reasonable alternatives.
- 3.2.2 Different types of options need to be considered depending on the nature of the DPD in question. Types of options include:
- Strategic spatial options governing the level and distribution of development in an area;
  - Policy or thematic options addressing particular topics e.g. affordable housing, density or open space; and
  - Locational or site specific options for allocating areas or particular parcels of land for particular uses e.g. housing, employment, retail.

3.2.3 Waltham Forest undertook a process of options generation in producing the Core Strategy. This process was informed by:

- Issues gathering;
- Background studies and evidence;
- National guidance;
- Regional and local planning policies;
- Other local plans and strategies;
- Specific publications relating to Waltham Forest;
- Previous consultation exercises; and
- The SA Scoping Report and Interim SA Report.

### Testing Options

3.2.4 The Planning Advisory Service (PAS) has prepared guidance on generating and assessing options and identified four 'tests' that potential options should undergo<sup>3</sup>. These are:

- The Reasonableness Test to establish if the option is realistic and genuinely deliverable;
- Community engagement;
- Sustainability Appraisal; and
- The Habitats Regulations test to ascertain if the options are likely to have significant effects on the integrity of European wildlife sites.

### Selecting Options

3.2.5 In evaluating the options the Council examined the outcomes of the four tests. The findings of the SA Report of the Preferred Options were among the factors that were considered by the Council in the selection of the draft submission policies.

## 3.3 The Core Strategy Proposed Submission

3.3.1 The Core Strategy Proposed Submission document contains the proposed Core Strategy policies. There have been a considerable number of amendments since the Preferred Options document was consulted upon. The reasons for revisions to policies arising from consultation responses are documented in the Core Strategy Preferred Options Summary of Consultation response<sup>4</sup>. The majority of policies have been restructured/ ordered and their content revised.

3.3.2 Communities and Local Government (CLG) has published several new Planning Policy Statements (PPSs). This new information has influenced development of Core Strategy policies.

3.3.3 A main change since the Preferred Options consultation is the addition of a new policy 'CS1 Distribution of Growth' this policy includes components of the Preferred Options consultation policy CS1 Improving Housing Quality and Choice'. Further, Preferred Option policy CS4 – Responding to Climate Change has been significantly revised – this policy has been divided into four individual Core Policies:

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<sup>3</sup> Planning Advisory Service (2009) Local Development Frameworks: Guidance on Options Generation and Appraisal

<sup>4</sup> Waltham Forest Preferred Options Consultation responses (16 11 2010)

- CS5 – Minimising and Adapting to Climate Change
- CS6 – Enhancing Green Infrastructure and Biodiversity
- CS7 – Promoting Sustainable Waste Management and Recycling
- CS8 – Developing Sustainable Transport

3.3.4 Preferred Option policy CS11 – Making the most of regeneration has been deleted as aspects of this policy are now contained within the new CS1 and other revised Core Strategy policies.

3.3.5 The majority of amendments to the Preferred Options policies have been a result of the consultation responses and discussions with elected Members, internal officers and statutory bodies.

**Table 3.1 Proposed Core Strategy Policies evolution since the Preferred Options**

Core Strategy Proposed Submission Policy	Key changes since Preferred Options
CS1 Distribution of Growth	New policy – focusing on regeneration rather than just housing as was the case in the previous Preferred Options policy CS1. Point A includes the same identified regeneration areas but the rest of the policy is new.
CS2 Improving Housing Quantity and Choice	<p>Previously policy CS1</p> <p>Wood Street is a new regeneration area.</p> <p>Housing supply – new references to “making the most effective and efficient use of land, by seeking to optimise housing densities”; and</p> <p>“prioritising development on previously developed land, particularly unused or underused land”; and</p> <p>“Working with housing partners to support the programme of housing estate renewal.”</p> <p>Affordable Housing – same threshold and mix</p> <p>Mixed and Balanced Communities – revised points D and E includes specific reference to family homes of 3 bedrooms or more.</p> <p>Design Quality and Accessibility – this has taken content from parts F and G, emphasise on the needs of residents throughout their changing life cycle.</p> <p>Housing for Older and Vulnerable Communities – a revised part F</p> <p>Provision for Gypsies and Travellers – previously part H reworded.</p>
CS3 – Making Efficient Use of Employment Land	<p>This was previously policy CS2 – Create an Economically Balanced Population.</p> <p>The policy has been restructured and reworded and divided into</p>

Core Strategy Proposed Submission Policy	Key changes since Preferred Options
	<p>key sustainable economic growth factors.</p> <p>Part A was previously B Part B was previously A Part C was previously D Part D was previously E Part E was previously C.</p> <p>Parts F to K have been removed from the policy text as broadly they either duplicated other parts of the document, or are not in themselves deliverable policies; but instead justification or implementation. The contexts of these points are included elsewhere in the Core Strategy. Further detail is set out below:</p> <p>G) Addressing climate change is addressed elsewhere in the core strategy so removed to avoid duplication. A suitable cross reference to the appropriate policy is included in the justification (para 6.17). References to green industries, and the possibility to direct them towards SIL are made in para 6.12 of justification.</p> <p>H) Supporting BIDs is not a planning policy so reference to it has instead been made under implementation paragraph 6.34 (recognising the Council carries out other activities not directly related to planning).</p> <p>I) Has been incorporated into justification of policy under para 6.16 as is not a policy in itself but helps justify approach of rationalising amount of land designated</p> <p>J) Cut to avoid duplication of policies in transport and worklessness chapters.</p> <p>K) Again not a planning policy so moved to implementation in recognition that there are workstreams outside of planning that the Council is involved in that relate to the issue. Now in paras 6.35 and 6.36</p>
CS4 – Providing Infrastructure	<p>This was previously policy CS3 Cultivate Civic Participation and Social Cohesion.</p> <p>The policy has been condensed and re written to focus on the key aspects of social infrastructure.</p>
CS5 – Minimising and Adapting to Climate Change	<p>This was previously CS4 – Responding to Climate Change</p> <p>Full rewording and organisation of policy.</p> <p>Addition of Flood risk and Water Efficiency to policy. Removal of Protection of the Natural Environment, Sustainable Waste Management and Developing a Sust. Transport Network. These are now contained within CS6 (Enhancing Green Infrastructure and Biodiversity), CS7 and CS8</p>

Core Strategy Proposed Submission Policy	Key changes since Preferred Options
CS6 – Enhancing Green Infrastructure and Biodiversity	<p>New Policy</p> <p>Previously natural environment was contained within PO CS4.</p> <p>Policy content has been considerably expanded upon.</p>
CS7 Promoting Sustainable Waste Management and Recycling	<p>New Policy</p> <p>Previously contained within PO CS4</p> <p>Content is similar to previously sustainable waste management section.</p> <p>There is additional reference included to treating waste as close to the source as possible and encouraging the sustainable movement of waste – use of rail and water where feasible.</p>
Policy CS8 – Developing Sustainable Transport	<p>New Policy</p> <p>Previously contained within PO CS4.</p> <p>This policy has been considerably reworded and revised to contain references to working with TfL, Network Rail and other partners, production of travel plans and travel assessments, links to safety of the public realm with encouraged walking and cycling, inclusion of freight transport. Removal of references to waterbourne transport.</p>
CS9 – Promoting Better Education	<p>Previously policy CS5 removal of link to contributing to the borough’s environment, removal of reference to redundant educational sites.</p> <p>This policy now contains additional requirements for community hubs and new allocation of land for schools.</p>
CS10 – Creating More Jobs and Reducing Worklessness	<p>Previously CS6 Maximising Employment Opportunities</p> <p>Policy has been refined and restructured under specific headings. The actual focus of the policy remains the same, just clarified.</p>
CS11 – Tourism Development and Visitor Attractions	<p>New Policy</p>
CS12 – Protecting and Enhancing Heritage Assets	<p>New Policy.</p> <p>Heritage was previously only contained within CS9 part G.</p>
CS 13 – Promoting Health and Fitness	<p>Previously CS7 – Ensure residents are fit and healthy</p> <p>Removal of references to open spaces as this is now included within CS6. Removal of ‘food’ now included in CS6 within</p>

Core Strategy Proposed Submission Policy	Key changes since Preferred Options
	<p>allotment section.</p> <p>Includes specific reference to pedestrian and cycle access to the Olympic park and Lea Valley.</p>
<p>CS14 – Creating Attractive and Vibrant Town Centres</p>	<p>Previously CS8 – Vibrant Town Centres</p> <p>Policy reordered and slightly consolidated.</p> <p>There are new references to appropriate role of district and neighbourhood centres.</p>
<p>CS15 – Well designed buildings, places and spaces</p>	<p>Previously CS9 – Transform Design and Quality of Public Space</p> <p>A revised policy which has been condensed and reordered.</p> <p>Reference to achieving specific good practice design guidance standards has been lost from the actual policy text (CABE and Building for Life Standards) – now included within supporting text.</p> <p>References to materials, sustainable construction and climate change impact have been removed.</p> <p>Addition of height and scale considerations to the policy.</p>
<p>CS16 - Making Waltham Forest Safer</p>	<p>Previously CS10 – Improving Community Safety</p> <p>Policy been considerable revised and many points deleted which were specifically spatial planning issues.</p> <p>The policy now contains the inclusion of ‘Co-ordinating land uses so as to minimise the likelihood of anti-social behaviour.’</p>
<p>Deletion of Policy CS 11 – Making the most of regeneration</p>	<p>Aspects of this policy have been contained within CS1 and the other focused CS policies.</p>

### Consultation Responses from Preferred Options SA Report

3.3.6 A number of consultation responses were received relating to the Preferred Options consultation, as illustrated in table 3.2 below.

**Table 3.2 Preferred Options SA comments**

Consultation Response	How has this been taken into account in this SA report?
<p>Comments surrounding the EMD and its use as a cinema for community uses rather than other proposed community uses including the application for a church. States that it would act as an attraction for economic growth and regeneration in the day</p>	<p>The SA considers the impact of community uses on the local economy; however it does not specifically deal with the cinema as a community use.</p>

Consultation Response	How has this been taken into account in this SA report?
time and the night time economy.	
Pg14 Strategic Objectives Support SO9 subject to the following amendments. Create positive, responsive and inclusive environments including buildings and spaces of high quality that contribute to the distinctiveness of Waltham Forest's neighbourhoods, whilst also protecting and enhancing the borough's heritage assets and wider historic environment.	Strategic Objectives have been amended by the Council in light of consultation responses. SO9 has been split in to two separate Strategic Objectives – SO12 and SO15. Additional reference to the “wider historic environment” has not been included.
Pg23 Table 1.1 Mitigation Measures The proposed mitigation measures for the historic environment should consider carefully the protection and enhancement of all heritage assets and their settings, and not just listed buildings and conservation areas. This needs to be amended to reflect this approach.	Reference to the historic environment has been checked and where appropriate refers to all heritage assets and their settings.
Pg30 Appendix 1 - SO4 The conclusion drawn on the issue of "retrofitting" raises concerns in that the long term impacts upon the historic environment could be significant if the method of retrofitting applied is inappropriate to the integrity of the heritage asset. This statement needs to be qualified further.	Reference to retrofitting with regard to the historic environment has been checked and qualified where necessary.
Pg32 Appendix 1 - SO8 Support the comment that the objective of enhancing the borough's centres could provide opportunities to improve the built and natural environment. However we would seek to expand this point further by stating that investment in the historic environment will provide significant economic, social and environment benefits, especially if a heritage-led approach to regeneration is pursued.	We have considered the investment in the historic environment and the social, economic and environmental benefits the approach may deliver.
Pg32-33 Appendix 1 - SO9 Support the recognition given to the environmental and social benefits of protecting and enhancing the historic environment. However the comments on the economic benefits could be expanded further. Investment in the historic fabric of the Borough's built environment based on a heritage-led approach to regeneration has proven to provide significant economic benefits. This is reflected in uplift in land values, greater attraction of an area to new investors, and improved image thus making it more attractive to visitors.	As above.
Pg35-76 Appendix 2 - Draft Policy Matrices The proposed suggested changes to policies CS1, 2, 4, 7, 8, and 9 as expressed in our response to the Core Strategy should help improve the scoring given to sustainability appraisal objective 20 (conserve and enhance the historic built and natural environment).	The SA has been revised in light of amendments made to the Core Strategy policies since the Preferred Options consultation.

3.3.7 The following table includes the recommendations from the Preferred Options SA Report, and indicates where (if) they have been incorporated in to the Core Strategy Proposed Submission document.

**Table 3.2 Preferred Options SA Recommendations**

Policy (PO)	Recommendation	Implemented within Pre-Submission Core Strategy
CS1 Improve Housing Quality and Choice	No recommendations	
CS2 Create and Economically Balanced Population	Possibly include reference to other types of business to improve employment mix and to maximise employment opportunities that are relevant to Waltham Forest for example hotels in town centres for the 2012 Olympics.	No reference to Hotels in relation to the Olympics.
CS3 Cultivate Civic Participation and Social Cohesion	A more explicit reference to 'one stop shops' (and include a reference to Council services as part of 'community facilities') could be included in the text as a means of using land more efficiently and improving ease of access to necessary required facilities. The policy could be strengthened by the inclusion of a bullet point recommending that 'Access by Design'/Access for All' principles be applied to all major developments to ensure that buildings are accessible to all which would improve social cohesion. The policy could be strengthened with the addition of a bullet point to include: Council will seek to co-locate housing for specific groups e.g. the elderly in new community developments and facilities (particularly relating to health and social activities). This could be included in the policy and would make a positive contribution to the SA Frameworks objective of meeting local housing needs through the provision of a range of tenures and sizes of new dwellings.	The policy seeks to encourage multi-purpose facilities at one accessible location (similar to a 'one-stop' shop).  There is no reference to Design by Design or Access for All
CS4 Climate Change	It may be advisable to specify how	The revised policy CS5 –

Policy (PO)	Recommendation	Implemented within Pre-Submission Core Strategy
	much of a new developments energy requirements will need to be produced on-site in order to give clearer guidance to developers.	Minimising and Adapting to Climate Change has been significantly revised but does not include specific information regarding carbon reductions and energy efficiency measures.
CS5 Creating Wealth and Opportunity for Residents	That the policy explicitly states that in the case of the expansion of education premises the preference to do so will need to be on existing sites to minimise the impact on open land and to maintain open space for exercise, promoting health and well-being unless it can be proven that more sustainable alternatives do not exist and that any loss of open space or community facilities can be off-set elsewhere. It is possible to add: 'The developers of new homes will have to take into account the potential need to contribute to the provision (Planning Obligations Strategy) of primary and secondary school places in the Borough'	No obvious policy amendments
CS6 – Maximising Employment Opportunities	No recommendations	
CS7 – Ensure residents are fit and healthy	Upgrading the Public Realm by Council to promote accessibility is normally financed through development contributions (Section 106 agreements). Do we need to say this? Do we need a bullet point suggesting that we will work with other health partners in the Public Health Partnership to prevent ill-health and reduce health inequalities in the borough for example, 'Stop Smoking' organisations (high levels in WF)	No obvious policy amendments
CS8 – Vibrant Town Centres	No recommendations	N/A
CS9 – Transform Design and Quality of Public Space	No recommendations	N/A
CS10 – Improving	No recommendations	N/A

Policy (PO)	Recommendation	Implemented within Pre-Submission Core Strategy
Community Safety		
CS11 – Making the most of regeneration	In addition to the reference to developer contributions to re-open Hall Farm Curve the policy could also state what other objectives that developer contributions could make to AAP areas and local centres. A comprehensive and (in part developer funded) set of improvements to the streetscape and public realm is likely to make the AAP areas more attractive as a place to walk and cycle. This is likely to positively impact on people’s satisfaction with open spaces also have other positive, indirect consequences, because it will encourage people to leave their car at home (thus reducing pollution levels) and should make the overall environment more attractive as a place in which to do business.	This policy has now been deleted but amalgamated into CS1 and other CS Policies.

3.3.8 The Core Strategy Proposed Submission policies have evolved through the plan preparation process; in 2008 the Council undertook Issues and Options consultation, this stage considered the main policy approach alternatives which have been developed through the preferred options and now this submission stage. The following table illustrates the evolution of these submission policies.

Pre-Sub Core Strategy	Preferred Options	Issues and Options
CS1 Distribution of Growth	New Policy	None
CS2 Improving Housing Quantity and Choice	CS1	Option 3.4 Inclusive Design Option 4.1 Housing Targets Option 4.2 Balanced Supply of Housing Land Option 4.3 Affordable Housing Option 4.4 Social Rented and Intermediate Housing Option 4.5 Location of Affordable Housing Option 4.6 Specific Housing Needs Option 4.7 Gypsies and Travellers Option 9.2 Diversity
CS3 – Making Efficient Use of Employment Land	CS2	Option 5.1 Sustainable Economic Development Option 5.2 Environmental Quality Option 5.3 Regeneration and Release

Pre-Sub Core Strategy	Preferred Options	Issues and Options
CS4 – Providing Infrastructure	CS3	Options 8.4 Social and Community Facilities Option 9.2 Diversity Option 9.3 Deprivation
CS5 – Minimising and Adapting to Climate Change	CS4	Option 3.5 Flood Risk Option 8.3 Reduced Environmental Risk
CS6 – Enhancing Green Infrastructure and Biodiversity	CS4	Options 3.3 Natural Assets Option 4.8 Housing Quality Option 8.2 Open Space Provision Option 11.1 Renewable Energy Option 11.3 Energy Efficiency Option 11.4 Reduction of CO <sub>2</sub> Emissions
CS7 Promoting Sustainable Waste Management and Recycling	CS4	No options proposed as the North London Waste Plan had undergone consultation and further consultation was planned. Policy has to be in accordance with this DPD.
Policy CS8 – Developing Sustainable Transport	CS4	Option 10.1 Sustainable Transport 10.2 Managing Travel Demand 10.3 Enhancing the Transport Network
CS9 – Promoting Better Education	CS5	Option 6.1 Provision of Primary Schools Option 6.2 Provision of Secondary Schools Option 6.3 Community Hubs
CS10 – Creating More Jobs and Reducing Worklessness	CS6	Option 5.1 Enabling Skills Improvement Option 6.3 A, B Community Hubs
CS11 – Tourism Development and Visitor Attractions	New Policy	None
CS12 – Protecting and Enhancing Built Heritage Assets	New policy previously covered in Part G CS9	Option 3.2 Built Heritage Assets
CS 13 – Promoting Health and Fitness	CS7	Option 8.1 Promoting Physical Activity
CS14 – Creating Attractive and Vibrant Town Centres	CS8	Option 7.1 A Viable Network of Town Centres Option 7.2 Well Managed Growth Option 7.3 Well balanced mix of uses/improved town centre offer Option 7.4 Delivery of Town Centre Plans /Strategies
CS15 – Well designed	CS9	Option 3.1 High Quality Design Option 3.4 Inclusive Design

Pre-Sub Core Strategy	Preferred Options	Issues and Options
buildings, places and spaces		Option 4.8 Housing Quality
CS16 - Making Waltham Forest Safer	CS10	Option 4.8 Housing Quality Option 9.1 Making Safer Places

3.3.9

The following section of the report includes the appraisal findings of this Core Strategy Proposed Submission document, the findings are reported under the topic sections. A final section of this report provides the overarching summary and conclusion of the SA and provides recommendations and monitoring framework as well as a discussion of the cumulative effects.

## 4 Population

### 4.1 Introduction

4.1.1 This chapter discusses the population of London Borough of Waltham Forest and its composition now and in the future. As would be expected from a Borough in Greater London, in comparison to the national average, Waltham Forest is densely populated. The Waltham Forest social profile reflects one of the youngest and most ethnically diverse communities in the country<sup>5</sup>.

### 4.2 Context Review

4.2.1 The following are the key messages from the context review:

Message	Source
Ensure that development supports existing communities and contributes to the creation of safe, sustainable and liveable communities with good access to jobs and key services	Department for Communities and Local Government (2005) <i>PPS1: Delivering Sustainable Development</i>
Local people and local communities should be given more influence and power to improve their lives	Department for Communities and Local Government (2006) <i>Local Government White Paper</i>
Community engagement in planning should be more meaningful and effective	HM Government (2007) <i>Planning for a Sustainable Future: White Paper</i>
Make London a better city for people to live in: <ul style="list-style-type: none"> <li>• Improve the quality of Londoners' lives and the environment through better designed buildings and public spaces.</li> <li>• Address the differing needs of London's diverse population.</li> <li>• Provide the spatial framework for the Mayor's Culture Strategy and enhance the cultural assets of London, encourage development of new facilities in new areas, building upon racial and cultural differences that reinforce London's diversity</li> </ul>	Greater London Authority (2008) <i>The London Plan, Spatial Development Strategy for Greater London</i> (consolidated with Alterations since 2004)
North London will experience long-term growth in population, homes and jobs	Mayor of London (2005) <i>London Plan: Sub-Regional Development Framework (North London)</i>
To achieve the vision of the strategy the Local Strategic Partnership will seek to: <ul style="list-style-type: none"> <li>• Decrease crime and improve the safety and quality of the environment</li> <li>• Improve the health and well-being of local people</li> <li>• Improve learning opportunities to help individuals achieve their potential</li> </ul>	Waltham Forest Council (no date) <i>Waltham Forest Working Together Community Strategy 2012</i>

<sup>5</sup> Local Futures (2007) *The State of the Borough: An Economic, Social and Environmental Profile of Waltham Forest*

Message	Source
<ul style="list-style-type: none"> <li>• Improve the local economy and infrastructure</li> <li>• Increase community understanding and participation</li> </ul>	
<p>The four outcomes which the community strategy seeks to achieve are:</p> <ul style="list-style-type: none"> <li>• There is a common vision and a sense of belonging for all communities</li> <li>• The diversity of people's different backgrounds and circumstances are appreciated and positively valued</li> <li>• Those from different backgrounds have similar life opportunities</li> <li>• Strong and positive relationships are being developed between people from different backgrounds, in the workplace, in schools and within neighbourhoods</li> </ul>	<p>Waltham Forest Council (no date) <i>Waltham Forest Community Cohesion Strategy 2005 – 2008</i></p>

## 4.3 Likely Future Conditions

- 4.3.1 The population of Waltham Forest is expected to increase although the increases are expected to be less than the increases for London and Outer London. There would be an increased demand on the provision of services and facilities, and on housing as a consequence of this increase.

## 4.4 Environmental and Sustainability Issues

- 4.4.1 The following environmental and sustainability problems have been identified:
- An increasing population will require additional housing and infrastructure to cater for their needs
  - The population density is already high compared with London and England as a whole. An increasing population will increase the pressure on existing housing and infrastructure and additional development is likely to result in an increase in the population density.

## 4.5 Relevant SA / SEA Objectives

- 4.5.1 No relevant SA/SEA Objectives have been identified for this sustainability topic.

## 4.6 Policy Appraisal

- 4.6.1 As there are no identified relevant SA/SEA Objectives no appraisal discussion is required.

## 4.7 Proposed Monitoring

- 4.7.1 As there are no identified relevant SA/SEA Objectives no appraisal discussion is required and no monitoring is proposed.

## 5 Human Health

### 5.1 Introduction

5.1.1 According to the World Health Organisation, health can be defined as a state of complete physical, mental and social well-being and not merely the absence of disease<sup>6</sup>. The 2004 Index of Multiple Deprivation shows that Waltham Forest has high levels of deprivation. The Borough ranks 47<sup>th</sup> in England (of 354 local authorities, where 1<sup>st</sup> has the highest deprivation)<sup>7</sup>.

5.1.2 Waltham Forest has low levels of health when compared to the London and British benchmarks. The Borough records average life expectancy of 77.9 years, ranking Waltham Forest 316<sup>th</sup> in Britain<sup>8</sup>. The standardised mortality ratio is also slightly above the national average; this could be driven by the Borough's above-average cancer and circulatory disease mortality rates when compared with Britain as a whole<sup>9</sup>.

### 5.2 Context Review

5.2.1 The following are the key messages from the context review:

Message	Source
Manage and reduce environmental noise where necessary. Separate noise sensitive developments from major sources of noise and vice versa	Office of the Deputy Prime Minister (1994) <i>PPG24 Planning and Noise</i>
Shift away from a focus on treating illness and towards linking health to wider factors including access to social and public services in addition to health care	Department of Health (2004) <i>Choosing Health: Making Healthy Choices Easier, White Paper</i>
Increase the participation rate of 30mins activity, 5 times a week to 50% of the population by 2020 Encourage the innovative development of multi-sport clubs and facilities in order to offer a diverse and sustainable sporting experience to users Proactively engage with planning bodies to ensure the promotion of sport and active recreation as part of regional, county, unitary and district planning policies and LDFs	Sport England (no date) <i>Mission Possible: South East Plan for Sport 2004-2008</i>
Top priorities are to: <ul style="list-style-type: none"> <li>• Work for health and regeneration</li> <li>• Address inequalities and poverty</li> <li>• Promote the health of black and minority ethnic people</li> <li>• Improve transport, and related aspects of</li> </ul>	The London Health Strategy (2000) <i>London's Health: Developing a Vision Together. The London Health Strategy Outline Strategic Framework</i>

<sup>6</sup> World Health Organisation (1948) Preamble to the Constitution of the World Health Organisation

<sup>7</sup> Local Futures (2007) The State of the Borough: An Economic, Social and Environmental Profile of Waltham Forest

<sup>8</sup> Local Futures (2007) The State of the Borough: An Economic, Social and Environmental Profile of Waltham Forest

<sup>9</sup> Local Futures (2007) The State of the Borough: An Economic, Social and Environmental Profile of Waltham Forest

Message	Source
the environment	
Improve the availability of quality local services particularly education and health	Greater London Authority (2008) <i>The London Plan, Spatial Development Strategy for Greater London</i> (consolidated with Alterations since 2004)
<ul style="list-style-type: none"> <li>• Reduce the number of people on primary care chronic disease registers in Waltham Forest who are smokers by 5% by 2008.</li> <li>• Improve the equality of access to the stop smoking service in Waltham Forest by age group and ethnicity so that the gap between under-represented groups and the general population is less than 5% by 2008.</li> <li>• Increase the number of schools with 20% or more pupils eligible for free school meals participating in the Waltham Forest Healthy Schools scheme from 21 to 56 by 2006.</li> <li>• Reduce the gap between infant mortality in Waltham Forest and the national average by 10% by 2010.</li> <li>• Reduce the under-18 conception rate by 50% by 2010 as part of a broader sexual health strategy.</li> <li>• Establish an integrated children's service to improve the lives of disabled children and their families by September 2005</li> </ul>	Waltham Forest Council (no date) <i>Waltham Forest Working Together Community Strategy 2012</i>

## 5.3 Likely Future Conditions

5.3.1 Life expectancy in Waltham Forest has been slowly increasing and, based on past trends, this is likely to continue. Mortality rates from circulatory disease and cancer have been falling in the past 10 years but are higher than the rates for London and the rest of the country and this situation is unlikely to change.

5.3.2 Waltham Forest has an increasing rate of TB, which is concentrated in areas of high deprivation and overcrowding, and is most prevalent in African and Indian ethnic groups. Given that TB has been identified as a growing issue among these groups it could be assumed that greater awareness among health professionals and associated health campaigns will result in a stabilisation of the rate of increase of TB. It could also be assumed that this will be the case in relation to HIV.

5.3.3 The declining rates of teenage pregnancy are likely to continue to fall in line with past trends. However, the recent divergence of infant mortality rates suggests that this will continue to be an issue across the Borough.

## 5.4 Environmental and Sustainability Issues

5.4.1 The following environmental and sustainability problems have been identified:

- Life expectancy is lower than the average for London and the rest of the country
- Health inequalities for BME groups
- Southern part of the Borough is subject to higher levels of poor health, which has been associated with deprivation, poverty and overcrowding

## 5.5 Relevant SA / SEA Objectives

5.5.1 The following SA/SEA Objectives are relevant to this sustainability topic:

- Objective 3 - Improve the standard of health and wellbeing of those who live and work in the Borough
- Objective 4 - Improve the provision of, and access to, community facilities to meet local cultural, recreational and social needs
- Objective 8 - Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system
- Objective 12 - Improve air quality through a reduction in traffic-based emissions

## 5.6 Policy Appraisal

### Likely Significant Effects

#### **CS13 – Promoting Health and Fitness**

5.6.1 The policy aims to create and develop healthy and sustainable places and communities. It offers the potential for significant benefits in relation to improving the health and wellbeing of those who live and work in the Borough through improving access to open spaces, health facilities and services, leisure, sports and recreation facilities.

5.6.2 There are also benefits associated with improving pedestrian and cycle access to green and open spaces, including the Olympic Park, and through making the public realm more attractive and safer for pedestrians and cyclists. This will contribute towards SA Objective 8.

#### **Recommendations**

5.6.3 The policy references 'proliferation of unhealthy uses' but the supporting text indicates that this refers only to hot food takeaways. If this is the case then perhaps the policy should be amended to state it is the proliferation of hot food takeaways that is the issue.

### Likely Minor Beneficial Effects

#### **CS1 – Distribution of Growth**

5.6.4 This is a new policy, included for the Core Strategy Proposed Submission document. Over the plan period this policy will result in the delivery of essential infrastructure including health facilities in a timely fashion and identified beneficial effect with regard to the health and wellbeing of the population. This policy also seeks to tackle small spatial concentrations of deprivation in the middle and north of the borough, although the detail of these projects will be identified in the Site Specific Allocations DPD.

### **CS2 – Improving Housing Quality and Choice**

- 5.6.5 This policy was previously Preferred Option CS1. The delivery of housing across the borough will result in the provision of a wider choice and a better mix in the size and type of housing. The Council will continue to deliver quality specialist housing to meet the needs of the older and vulnerable communities, including requiring a percentage of new housing to be wheelchair accessible and all new homes built to lifetime homes standards. The Council is aiming to deliver well designed housing; this contributes to mitigating health inequalities and improved welfare of residents.

### **CS4 – Providing Infrastructure**

- 5.6.6 This policy delivers a proactive approach to the identification, protection and delivery of social infrastructure and minor beneficial effects are anticipated. The policy oversees the provision of social infrastructure, including health facilities, community facilities and sport and recreation provision.

### **CS6 – Enhancing Green Infrastructure and Biodiversity**

- 5.6.7 The policy seeks to safeguard and improve the provision of recreational spaces, outdoor sports facilities and parks. This contributes to both the accessibility of these community facilities and also to enabling people to use recreational spaces allowing healthy activities and lifestyle to be enjoyed/ maintained, a beneficial effect on SA Objectives 3 and 4. It also is ensuring the adequate provision of and efficient use of allotments, enabling residents to grow their own produce and make healthy food choices.

### **CS7 – Promoting Sustainable Waste Management**

- 5.6.8 Advocating the use of sustainable transport modes for the movement of waste where it cannot be treated at source positively contributes to reductions in air pollution where road based HGVs are not used as frequently. Improved air pollution can lead to improvements in health.

### **CS8 – Delivering Sustainable Transport**

- 5.6.9 This policy seeks to ensure the provision of attractive and accessible public transport routes and facilities, in particular walking and cycling, these routes should make community facilities and other social infrastructure accessible to all.

### **CS9 – Promoting Better Education Facilities**

- 5.6.10 Through the provision of accessible educational facilities for all ages, in particular by public transport minor benefits are envisaged for the health and well being of the boroughs residents.

### **CS11 – Tourism Development and Visitor Attractions**

- 5.6.11 Investment in the identified visitor attractions increases the potential for local communities to access and benefit from them, encouraging outdoor recreation and health and well-being amongst residents and visitors alike.

### **CS15 – Well designed buildings, places and spaces**

- 5.6.12 High quality designed and accessible, attractive and safe spaces and developments contribute towards a health and well being of residents as quality standards are improved and the feeling of well-being improved.

### **CS16 – Making Waltham Forest Safer**

5.6.13 Reducing crime and the fear of crime has associated minor health benefits through a sense of security in the boroughs new developments and existing regenerated spaces.

## **5.7 Proposed Monitoring**

5.7.1 The following indicators are proposed for monitoring purposes:

- Life expectancy
- Infant mortality
- NI 112 Teenage conception rates
- Tuberculosis infections
- HIV infections
- IMD rating
- NI 119 Self reported measures of people's overall health and well-being
- NI 120 All age mortality rate

## 6 Economy

### 6.1 Introduction

6.1.1 The economy of East London has not been as buoyant as other parts of the greater South East; it was strongly affected by closures of traditional industries, such as the furniture and footwear manufacturing, and did not gain as many jobs as West London in the growth industries of the 1980s (e.g. office jobs, high technology industries). Where new jobs were created, such as in Docklands, there has often been a mismatch between the skills needed for those jobs and the skills possessed by local people. There has been a stabilisation in local employment levels in Waltham Forest since the mid-1990s and this may have partly been related to investment undertaken in its major industrial areas.

6.1.2 Waltham Forest has a proportionally small knowledge economy by both London and national standards. Knowledge-driven employment accounted for 15.5 per cent of total employment in 2005, and ranked 291 out of 408 local areas in Britain<sup>10</sup>. The Borough also has over a third of workplace-based employment in public services, above both London and national averages.

6.1.3 Waltham Forest has below-average levels of prosperity by national standards with an average (residence-based) annual income of £20,800 compared to £22,623 in Britain<sup>11</sup>. Nationally, the Borough is ranked 221st out of 408 districts in terms of income. The 2004 Index of Multiple Deprivation shows that Waltham Forest has high levels of deprivation. Despite the high deprivation in Waltham Forest, the Borough records below-average levels of inequality, as measured by the difference between the most and least deprived super output areas in the Borough. The Borough is ranked 253rd nationally and 21st within London. This suggests that deprivation is not confined to small pockets, but is found across wider areas of the Borough.

### 6.2 Context Review

6.2.1 The following are the key messages from the context review:

Message	Source
Development should contribute to sustainable economic growth	Department for Communities and Local Government (2004) <i>PPS1 Delivering Sustainable Development</i>
The importance of industrial and commercial development should be balanced against maintaining and improving environmental quality. New development can be encouraged in locations that minimise vehicle trips and which can be served by energy efficient mode of transport. Developments should not add unacceptably to congestion	(1992) <i>PPG4: Industrial, Commercial Development and Small Firms</i>
The most efficient and effective use should be made of land and buildings especially vacant or derelict buildings (including historic buildings).	Department for Communities and Local Government (2007) <i>Consultation Paper on PPS4 Planning for Sustainable</i>

<sup>10</sup> Local Futures (2007) The State of the Borough: An Economic, Social and Environmental Profile of Waltham Forest

<sup>11</sup> Local Futures (2007) The State of the Borough: An Economic, Social and Environmental Profile of Waltham Forest

Message	Source
Economic development should be of high quality and inclusive design which improves the character and quality of an area and the way it functions	<i>Economic Development</i>
<ul style="list-style-type: none"> <li>Strengthen the diversity of London's economy, provide for small and ethnic minority businesses and encourage local enterprise, including social enterprise, throughout London</li> <li>Support emerging dynamic sectors of growth and innovation, such as green and creative industries, and encourage information technology and research, and the development of business intelligence in London</li> <li>Sustain and promote the rapid expansion of leisure and cultural industries that are both key to London's economy and are the most rapidly expanding sectors of its population's expenditure</li> </ul>	Greater London Authority (2008) <i>The London Plan, Spatial Development Strategy for Greater London</i> (consolidated with Alterations since 2004)
<ul style="list-style-type: none"> <li>Develop and implement a strategy to address worklessness, and reduce the gap between the Borough's unemployment rate and that of each of the Neighbourhood Renewal wards</li> <li>Develop and implement a partnership action plan to increase employment amongst lone parents, people with disabilities, ethnic minorities, people with the lowest qualifications and people aged over 50, and set three year targets by July 2005</li> <li>Achieve £500m of public/private investment in key regeneration areas by 2012</li> </ul>	Waltham Forest Council (no date) <i>Waltham Forest Working Together Community Strategy 2012</i>

## 6.3 Likely Future Conditions

6.3.1 Based on past trends it is likely that the local economy will remain stable with the potential for low levels of growth. Given the decline of some industries and the under-representation of others compared with the rest of London, it is possible that the proportion of financial and business services may increase to fill the gap left by declining sectors.

## 6.4 Environmental and Sustainability Issues

6.4.1 The following environmental and sustainability problems have been identified:

- Low levels of economic growth in the Borough
- Declining industrial sectors and under-representation of growth sectors

## 6.5 Relevant SA / SEA Objectives

6.5.1 The following SA/SEA Objectives are relevant to this sustainability topic:

- Objective 21 - Maintain and enhance the vitality and viability of the Borough's town centres
- Objective 22 - Improve the local economy by attracting inward investment
- Objective 23 - Maintain stable levels of employment in the Borough

## 6.6 Policy Appraisal

### Likely Significant Effects

#### **CS3 – Making Efficient Use of Employment Land**

6.6.1 This policy was previously CS2. The policy has been considerably restructured and divided up to focus on the key economic growth factors. There is a focus on encouraging a mix of employment facilities and types, in particular provision for small and medium sized enterprises and creative/cultural industries. This focus should in the medium to long term when proposals come forward deliver significant sustainability benefits with regard to employment delivery and the economic development of the Borough.

#### **CS10 – Creating More Jobs and Reducing Worklessness**

6.6.2 This Policy has changed considerably since the Preferred Options Policy CS6. Overall, it has been considerably rationalised, in recognition of the fact that many key decisions should be made through the Development Management Plans DPD, Area Action Plan DPDs and through negotiating Planning Obligations, rather than through the Core Strategy.

6.6.3 This policy seeks to maximise employment opportunities for the Borough's residents. Over the plan period this will promote significant positive benefits with regard to employment delivery and associated economic benefits for the local economy.

### Likely Minor Beneficial Effects

#### **CS1 – Distribution of Growth**

6.6.4 The policy seeks to focus additional growth (retail, leisure, small offices, community and cultural facilities) in town centres and for these areas to progressively evolve as fully functioning mixed use urban centres positively benefiting the vitality and viability of the town centres and local economy.

#### **CS3 – Making Efficient Use of Employment Land**

6.6.5 This policy focuses on key sustainable economic growth factors. There is a focus on encouraging a mix of employment facilities and types, in particular provision for small and medium sized enterprises and creative/cultural industries. This focus contributes towards improvements to the local economy.

### **CS11 - Tourism Development and Visitor Attractions**

6.6.6 The provision of high quality new visitor accommodation to retain tourists visiting the area and the provision of new leisure and cultural developments and the protection and enhancement of other unique assets (the natural environment) all contribute to securing maximum economic benefit. Walthamstow town centre should be the focus for new tourist developments these contribute to enhancing the vitality and viability of the town centre.

### **CS14 – Creating Attractive and Vibrant Town centres**

6.6.7 It is intended through this policy to reinforce the existing hierarchy of centres, although there is a focus on ensuring that District Centres can progressively develop as fully functioning mixed-use and higher density urban centres, this focus enables inward investment and expansion of the local economy over time.

## **6.7 Proposed Monitoring**

6.7.1 The following indicators are proposed for monitoring purposes:

- VAT registrations and deregistrations
- Vacant premises
- NI117 New business registration rate
- NI172 percentage of small businesses in an area showing employment growth

## 7 Employment and Skills

### 7.1 Introduction

7.1.1 Waltham Forest recorded a relatively low employment rate of 66.7 per cent in 2006, below the EU Lisbon Strategy target of 70 per cent<sup>12</sup>. This ranks the Borough 377th in Britain; relative to the labour market in London as a whole the Borough ranks 20th. Unemployment was above the national rate at 3.9 per cent in September 2007; of those, an above-average share was classed as long-term unemployed (out of work for at least a year). Youth unemployment is also above-average by London and national standards. Recent figures suggest a slight improvement in this profile with employment rates increasing during the 2004-2006 period, whilst overall rates in London and Britain slightly contracted.

7.1.2 Qualifications and skills levels in Waltham Forest ranks very low, as with most of east London. Waltham Forest ranks 377th out of 408 local areas in Great Britain on an overall skills and qualifications score<sup>13</sup>. The Borough records a relatively small share of pupils achieving five or more GCSEs at grades A\* to C (53.1 per cent, compared to 58.5 per cent in Britain). This is passed onto the working-age resident population with 30.9 per cent in 'skills poverty' (qualified to below NVQ Level 2), compared to 22.4 per cent nationally. Over a quarter of the working-age resident population has 'high skills' (qualified to at least NVQ Level 4); however, this is below the London and national averages.

### 7.2 Context Review

7.2.1 The following are the key messages from the context review:

Message	Source
New employment should be focused around areas where people live and can easily access jobs without having to travel by car	(1992) <i>PPG4 Industrial, Commercial Development &amp; Small Firms</i>
A good supply of land and buildings is required which offers a range of opportunities for creating new jobs in large and small businesses as well as start-up firms and which is responsive to changing needs and demands. Need to recognise, and positively plan for, the benefits that can accrue when certain types of businesses locate within proximity of each other or with other compatible land uses such as universities and hospitals. Sustainable travel choices should be promoted where possible	Department for Communities and Local Government (2007) <i>Consultation Paper on PPS4 Planning for Sustainable Economic Development</i>
Promote a strong, stable and productive economy with access for all to jobs, to regeneration and improved employment	HM Government (2007) <i>Planning for a Sustainable Future: White Paper</i>

<sup>12</sup> Local Futures (2007) *The State of the Borough: An Economic, Social and Environmental Profile of Waltham Forest*

<sup>13</sup> Local Futures (2007) *The State of the Borough: An Economic, Social and Environmental Profile of Waltham Forest*

Message	Source
prospects	
<ul style="list-style-type: none"> <li>• Support emerging dynamic sectors of growth and innovation, such as green and creative industries, and encourage information technology and research, and the development of business intelligence in London</li> <li>• Provide the relevant training, transport accessibility and support to allow Londoners to compete successfully for jobs in London</li> <li>• Sustain and promote the rapid expansion of leisure and cultural industries that are both key to London's economy and are the most rapidly expanding sectors of its population's expenditure</li> </ul>	Greater London Authority (2008) <i>The London Plan, Spatial Development Strategy for Greater London</i> (consolidated with Alterations since 2004)
<ul style="list-style-type: none"> <li>• Develop and implement a strategy to address worklessness, and reduce the gap between the Borough's unemployment rate and that of each of the Neighbourhood Renewal wards</li> <li>• Develop and implement a partnership action plan to increase employment amongst lone parents, people with disabilities, ethnic minorities, people with the lowest qualifications and people aged over 50, and set three year targets by July 2005</li> </ul>	Waltham Forest Council (no date) <i>Waltham Forest Working Together Community Strategy 2012</i>

## 7.3 Likely Future Conditions

7.3.1 Residents within Waltham Forest have a relatively low level of educational attainment when compared with the rest of the country; however the majority of residents are employed in managerial or professional/technical occupations. The wages of those living in Waltham Forest is higher than those working in the Borough, which suggests that residents commute out of the Borough to access better paid work. Unemployment levels are in line with the rest of London. Based on recent trends, it is unlikely that the current situation will change significantly.

7.3.2 Waltham Forest is adjacent to the Thames Gateway Growth Area and the Olympic Park in Stratford. Increased development in these areas is likely to result in improved opportunities for access to employment within the construction and development industries, which in turn could offer opportunities for improved skills and training for those residents of Waltham Forest who currently have low skills levels.

## 7.4 Environmental and Sustainability Issues

7.4.1 The following environmental and sustainability problems have been identified:

- Average salaries for those working in Waltham Forest are lower than average salaries for those living in the Borough. This disparity could affect the Borough's ability to attract inward investment.
- Unemployment levels are higher than the average for Great Britain.
- Educational attainment is relatively low and a high proportion of people have no qualifications.

## 7.5 Relevant SA / SEA Objectives

7.5.1 The following SA/SEA Objectives are relevant to this sustainability topic:

- Objective 5 - Improve educational attainment in schools
- Objective 6 - Improve opportunities for access to education and training for all residents
- Objective 7 - Reduce the overall level of deprivation
- Objective 22 - Improve the local economy by attracting inward investment
- Objective 23 - Maintain stable levels of employment in the Borough

## 7.6 Policy Appraisal

### Likely Significant Effects

#### **CS1 – Distribution of Growth**

7.6.1 The policy seeks to protect employment land in the SILs (Strategic Industrial Locations) and other Borough Employment Areas positively contributing to the maintenance of the borough's employment locations.

#### **CS3 – Making Efficient Use of Employment Land**

7.6.2 There is a focus on encouraging a mix of employment facilities and types, in particular provision for small and medium sized enterprises and creative/cultural industries. This focus should in the medium to long term when proposals come forward deliver significant sustainability benefits with regard to employment delivery and the economic development of the Borough.

#### **CS10 – Creating More Jobs and Reducing Worklessness**

7.6.3 This policy seeks to maximise employment opportunities for the Borough's residents. Over the plan period this will promote significant positive benefits with regard to employment opportunities.

### Likely Minor Beneficial Effects

#### **CS10 – Creating More Jobs and Reducing Worklessness**

7.6.4 This policy protects and resists the loss of identified employment, SIL and office developments within Walthamstow Town Centre. It is also seeking to intensify and upgrade existing employment land to secure more jobs for local people particularly in the identified regeneration

areas. Office developments in Walthamstow town centre will enhance the vitality and viability of the centre (SA Objective 21), also if non-productive employment land is within the town centres this can be released for more productive uses (including residential).

#### **CS4 – Providing Infrastructure**

7.6.5 The policy supporting text includes reference to Job Brokerage Centres which require additional space in certain areas of the Borough; this service contributes to maintaining and delivering new employment opportunities across the borough.

#### **CS9 – Promoting Better Education**

7.6.6 Through the allocation of land for new schools, and the requirement that new schools will be developed as community hubs, the policy is enabling provision of education facilities for all spectrums of the boroughs population.

## **7.7 Proposed Monitoring**

7.7.1 The following indicators are proposed for monitoring purposes:

- Residence and work-based earnings
- Employment by occupation
- Qualifications.
- NI 151 overall employment rate (working age)

## 8 Transport

### 8.1 Introduction

8.1.1 Road traffic can cause congestion and air and noise pollution. Emissions from the transport sector also contribute to climate change. Government policy focuses on promoting sustainable transport and encouraging the use of public transport, walking and cycling for those journeys where these are realistic alternatives to the car.

8.1.2 As with the rest of London, Waltham Forest is well connected and scores very well on the connectivity index, ranking 24th out of 408 districts nationally<sup>14</sup>. The River Lea Valley borders Waltham Forest on its western side with a string of reservoirs and waterways and on its eastern sides by Epping Forest. To the south is the London Borough of Newham with the major transport hub at Stratford a short distance away. The transport infrastructure reflects this geography. Roads and rail links run predominantly from north-east to south-west to access central London. Crossings of the River Lea corridor are limited for both road and rail – there are only five road crossings out of Waltham Forest on its western borders plus two bridges for walkers and cyclists only<sup>15</sup>.

### 8.2 Context Review

8.2.1 The following are the key messages from the context review:

Message	Source
Tackle congestion and pollution by improving all types of transport - rail and road, public and private - in ways that increase choice. It is a strategy for investment in the future to create prosperity and a better environment	Department for Transport (2000) <i>Transport Ten Year Plan 2000</i>
<ul style="list-style-type: none"> <li>• Sustained investment in transport in the long term</li> <li>• Significant improvements needed in the management of the existing transport network</li> <li>• Need for long-term planning and integration of transport policy with other policy areas</li> </ul>	Department for Transport (2004), <i>The Future of Transport</i>
<p>Maximise the competitiveness and productivity of the economy</p> <p>Address climate change, by cutting emissions of carbon dioxide (CO<sub>2</sub>) and other greenhouse gases</p> <p>Protect people's safety, security and</p>	Department for Transport (2007) <i>Towards a Sustainable Transport System. Supporting Economic Growth in a Low Carbon World</i>

<sup>14</sup> Local Futures (2007) The State of the Borough: An Economic, Social and Environmental Profile of Waltham Forest

<sup>15</sup> Details taken from Waltham Forest Council (2007) Local Implementation Plan

<http://www.walthamforest.gov.uk/index/transport/envpl-transport-planning/envpl-local-impl-plan.htm>

Message	Source
<p>health. Improve quality of life, including through a healthy natural environment Promote greater equality of opportunity</p>	
<p>New development should be accessible by public transport. The emphasis should be on priority to people over ease of transport movement. Increase the choice of travel options by encouraging schemes to improve cycle lanes, pedestrian walkways and public transport. Plans should include increasing access to the transport network for the disabled</p>	<p>Office of the Deputy Prime Minister (2001) <i>PPG13: Transport</i></p>
<p>Sets out the transport strategy for London, including the Mayor's ten key transport priorities ranging from reducing traffic congestion to making the distribution of goods more reliable. Under the GLA Act 1999, each borough is required to produce a Local Implementation Plan setting how the borough plans to implement the Mayor's Transport Strategy at a local level.</p>	<p>Greater London Authority (2001) <i>The Mayor's Transport Strategy</i></p>
<ul style="list-style-type: none"> <li>• Improve and expand London's public transport through increased and phased investment in services and infrastructure</li> <li>• Minimise the need to travel and the growth of journey lengths</li> <li>• Integrate development with public transport to ensure that there is a proper fit between development and the capacity of the public transport network to service it over the period on the plan, taking appropriate opportunities to intensify the use of land where current or future transport capacity allows and to connect Londoners to employment opportunities</li> <li>• Tackle congestion through levels of restraint of car use appropriate to different parts of London and the provision of alternatives, including the improvement of access on foot and cycling and better and safer facilities for pedestrians and cyclists</li> </ul>	<p>Greater London Authority (2008) <i>The London Plan, Spatial Development Strategy for Greater London (consolidated with Alterations since 2004)</i></p>
<p>Ensure that there are better, integrated transport links to employment centres</p>	<p>Waltham Forest Council (no date) <i>Waltham Forest Working Together Community Strategy 2012</i></p>

Message	Source
<ul style="list-style-type: none"> <li>• Improve road safety and reduction in the number of killed and seriously injured casualties on the borough's roads</li> <li>• Enhancement of the bus network through introduction of further bus priority, enforcement and new services</li> <li>• Reduction of traffic congestion through travel awareness and implementation of traffic reduction initiatives</li> <li>• Improving working of and compliance with parking and loading arrangements</li> <li>• Improve transport safety, accessibility and social inclusion on the transport network</li> <li>• Encourage walking and cycling in the borough in part by improving existing facilities</li> </ul>	<p>Waltham Forest (2007) <i>Local Implementation Plan</i></p>

### 8.3 Likely Future Conditions

- 8.3.1 Whilst the majority of people living in the borough use public transport to access employment, there is still a high dependence on the private car and this trend is expected to continue for the foreseeable future. Coupled with this, levels of car ownership are expected to rise thereby contributing to air pollution, greenhouse gas emissions and traffic congestion.
- 8.3.2 Rising car ownership, personal wealth and population are expected to lead to an increase in the number of trips made within the borough and further enhancement to the transport network will be needed to accommodate this. Many of these additional trips are expected to be made on public transport, on cycle or by foot and the growth in use of these modes seen in recent years is expected to continue.
- 8.3.3 Commuting patterns in Waltham Forest are such that people are travelling relatively short distances to access employment when compared to London and national averages. The proximity of the Borough to Central London and Stratford means that this situation is unlikely to change in the foreseeable future.

### 8.4 Environmental and Sustainability Issues

- 8.4.1 The following environmental and sustainability problems have been identified:
  - Reliance on the private car as the main mode of transport, contributing to air pollution, greenhouse gas emissions and congestion
  - Increasing car ownership, personal wealth and population is expected to place further demands on the local transport network leading to increased congestion and time spent travelling.

- Expansion of the transport network could require additional land that may otherwise have been given to other uses

## 8.5 Relevant SA / SEA Objectives

8.5.1 The following SA/SEA Objectives are relevant to this sustainability topic

- Objective 8 - Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system
- Objective 10 - Reduce greenhouse gas emissions

## 8.6 Policy Appraisal

### Likely Significant Effects

#### **CS8 – Delivering Sustainable Transport**

8.6.1 This policy is clearly focused on promoting sustainable transport, in particular through the location of developments and the provision of accessible and attractive routes and facilities for public transport, in particular walking and cycling. The policy also requires the production of travel plans and transport assessments. These mechanisms offer significant benefits in the long term with achieving accessible facilities through an integrated transport system.

### Likely Minor Beneficial Effects

#### **CS1 – Distribution of growth**

8.6.2 This policy is looking to ensure the timely delivery of essential infrastructure to support the planned growth across the borough. This includes upgrades to underground lines and the Bus network, the reinstatement of the Chingford –Stratford line and Lea Bridge Station. These contribute to improved accessibility of local services and employment locations.

#### **CS4 – Providing Infrastructure**

8.6.3 This policy delivers minor benefits with regard to the delivery of social infrastructure to increase accessibility and provision of community, recreational and cultural facilities to meet local needs.

#### **CS9 – Promoting Better Education**

8.6.4 Through the allocation of land for new schools, and the requirement that new schools will be developed as community hubs the policy is enabling provision of education facilities for all spectrums of the boroughs population. These facilities are to be accessible by public transport modes.

#### **CS10 – Creating more Jobs and Reducing Worklessness**

8.6.5 This policy will support infrastructure improvements that enhance and resident's access to employment areas via public transport, foot and bicycle.

### **CS13 – Promoting Health and Fitness**

8.6.6 The policy will provide convenient pedestrian and cycle access to the Olympic Park and its Legacy and associated sports facilities throughout the Lea Valley.

## **8.7 Proposed Monitoring**

8.7.1 The following indicators are proposed for monitoring purposes:

- Travel to work by mode
- NI 167 Congestion – average journey time per mile during the morning peak

## 9 Crime and Safety

### 9.1 Introduction

9.1.1 Crime and the fear of crime is a quality of life issue. Government policy aims to support communities and contribute to the creation of safe communities.

9.1.2 Waltham Forest has a high level of crime relative to London and Britain as a whole. In 2006/07 the Borough recorded 80.4 offences in total per 1000 people, compared to 71.0 in London and 60.7 in England and Wales. This matches the high crime found in Waltham Forest's neighbouring Boroughs; vehicle crime and violent crime rates were significantly higher than the national averages<sup>16</sup>. Home Office data for 2007/08 shows that Waltham Forest had 116.1 offences per 1,000 population compared with 114.9 for London as a whole<sup>17</sup>.

### 9.2 Context Review

9.2.1 The following are the key messages from the context review:

Message	Source
Stronger focus on serious violence Continued pressure on anti-social behaviour. Renewed focus on young people. New national approach to designing out crime Continuing to reduce reoffending	Home Office (2007) <i>Cutting Crime. A New Partnership 2008-11</i>
Ensure that development supports existing communities and contributes to the creation of safe, sustainable and liveable communities	Department for Communities and Local Government (2005) <i>PPS1 Creating Sustainable Communities</i>
<ul style="list-style-type: none"> <li>Identify people most at risk of involvement in criminal activity, gangs and drugs, and develop a varied offer of intensive and holistic support and positive activities.</li> <li>Develop an area based approach to tackling crime, improving liveability and reducing anti-social behaviour.</li> <li>Tackle fear of crime by ensuring that public spaces and transport infrastructure are well designed, maintained and used.</li> </ul>	Waltham Forest (2008) Sustainable Communities Strategy

### 9.3 Likely Future Conditions

9.3.1 It is likely that incidences of crime will remain high in the future compared with the rest of the country.

<sup>16</sup> Local Futures (2007) The State of the Borough: An Economic, Social and Environmental Profile of Waltham Forest – These figures refer to British Crime Survey crimes, which are a basket of 10 crimes and do not reflect the situation for all crimes Page: 45

<sup>17</sup> London Borough of Waltham Forest, Community Safety Department

## 9.4 Environmental and Sustainability Issues

9.4.1 The following environmental and sustainability problems have been identified:

- Crime levels are generally higher in Waltham Forest than nationally

## 9.5 Relevant SA / SEA Objectives

9.5.1 The following SA/SEA Objective is relevant to this sustainability topic

- Objective 2 - Reduce crime and the fear of crime

## 9.6 Policy Appraisal

### Likely Significant effects

#### **CS16 – Making Waltham Forest Safer**

9.6.1 Over the plan period this policy should achieve significant benefits with regard to reducing crime and the fear of crime through implementing designing out crime principles in all new development, promoting safer streets and public realm improvements in particular in areas with higher levels of crime and through focusing land-uses to minimise the likelihood of anti-social behaviour.

### Likely Minor Beneficial Effects

#### **CS15 – Well designed buildings, places and spaces**

9.6.2 The policy will require new development to demonstrate that it will enable the creation of safe and secure communities and is likely to have a minor beneficial effect on SA Objective 2.

## 9.7 Proposed Monitoring

9.7.1 The following indicators are proposed for monitoring purposes:

- Level of crime

## 10 Housing

### 10.1 Introduction

10.1.1 Average house prices in Waltham Forest are above the average for England and Wales, with the average house in the Borough being 22.7 per cent higher than the average in Britain as a whole<sup>18</sup>. However, Waltham Forest is quite affordable relative to London (measured by the ratio of workplace based earnings to house prices), whose housing market is skewed by the extreme prices in some Boroughs. Comparing the ratio of workplace-based earnings to house prices yields an affordability measure; this ranks the Borough 239th out of 376 (where 1st is the most affordable) and the 9th most affordable Borough in London<sup>19</sup>.

10.1.2 Within the built-up area of the Borough a broad distinction can be made between the northern and southern areas. The southern parts of the Borough - Leyton, Leytonstone and Walthamstow - were mainly developed in the latter part of the Victorian era and they have traditionally provided homes for first-time buyers. Many have invested in their homes and so brought about a gradual upgrading in the local private housing stock over the past decade. Industrial and commercial premises are often located very close to houses, and whilst the provision of social and community facilities like schools may have met the standards of the day, they are now considered unsatisfactory in some cases. In contrast, the northern parts of the Borough are generally more open in character with houses built to higher specifications and there are relatively well distributed open spaces and community facilities<sup>20</sup>.

### 10.2 Context Review

10.2.1 The following are the key messages from the context review:

Message	Source
<p>Create sustainable communities in which people want to live which:</p> <ul style="list-style-type: none"> <li>• are economically prosperous</li> <li>• have decent homes at a price people can afford</li> <li>• safeguard the countryside</li> <li>• enjoy a well-designed, accessible and pleasant living and working environment</li> <li>• are effectively and fairly governed with a strong sense of community</li> </ul>	<p>Office of the Deputy Prime Minister (2003). <i>Sustainable Communities in the South East: Building for the Future</i></p>
<p>Everyone to have the opportunity to live in a decent home. Community needs should be met through a wide choice of high quality homes. Opportunities for home ownership should be widened to those who cannot afford market housing.</p>	<p>Department of Communities and Local Government (2006) <i>PPS3: Housing</i></p>

<sup>18</sup> Local Futures (2007) The State of the Borough: An Economic, Social and Environmental Profile of Waltham Forest

<sup>19</sup> Local Futures (2007) The State of the Borough: An Economic, Social and Environmental Profile of Waltham Forest

<sup>20</sup> London Borough of Waltham Forest Unitary Development Plan First Review 2006

Message	Source
<p>Affordable housing policy is based around three themes:</p> <ul style="list-style-type: none"> <li>• providing high quality homes in mixed sustainable communities for those in need;</li> <li>• widening the opportunities for home ownership;</li> <li>• offering greater quality, flexibility and choice to those who rent</li> </ul>	<p>Department of Communities and Local Government (2006) <i>Delivering affordable housing</i></p>
<p>Achieve targets for new housing, including affordable housing, that will cater for the needs of London's existing and future population and give more people who need it access to homes they can afford</p>	<p>Greater London Authority (2008) <i>The London Plan, Spatial Development Strategy for Greater London</i> (consolidated with Alterations since 2004)</p>

## 10.3 Likely Future Conditions

- 10.3.1 The majority of households in Waltham Forest are classed as small households, comprising one or two people. There are a fairly significant number of households comprising lone parents and around 10% of households contain 'concealed households'. The majority of dwellings in the Borough are terraced and therefore there could be an issue with the availability of family accommodation. The average cost of dwellings in Waltham Forest is low when compared with the rest of London but higher than the national average. There is an identified shortfall between house prices and the potential mortgages that could be obtained by those earning an average salary. This means that 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.
- 10.3.2 The majority of households in the Borough are owner-occupiers but there are a large minority of households that live in social rented or shared ownership accommodation. The number of households on the Housing Register is high and although it has been decreasing in recent years it is likely that, given the high cost of housing at the current time, the number on the Housing Register could increase in the future.
- 10.3.3 The provision of affordable housing is not meeting current needs and this is likely to continue in the future.

## 10.4 Environmental and Sustainability Issues

- 10.4.1 The following environmental and 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 potential shortfall in the provision of family accommodation
  - There is a shortfall in the provision of affordable housing to meet the requirements of those in housing need

## 10.5 Relevant SA / SEA Objectives

10.5.1 The following SA/SEA Objectives are relevant to this sustainability topic:

- Objective 1 - Meet local housing needs through the provision of a range of tenures and sizes of new dwellings
- Objective 7 - Reduce the overall level of deprivation
- Objective 16 - Make the best use of previously developed land (PDL) and existing buildings

## 10.6 Policy Appraisal

### Likely Significant Effects

#### **CS1 – Delivery of Growth**

10.6.1 This policy will, over the plan period deliver significant benefits as the required and planned for housing allocation (10,320 new homes) is implemented and the associated benefit of meeting housing need and delivering the required size and tenure of dwelling is realised.

#### **CS2 – Improving Housing Quality and Choice**

10.6.2 The delivery of the housing allocation, over the plan period (long term) will significantly benefit meeting local housing need. The policy requires housing to be delivered to meet identified tenures and in particular affordable units (370 a year). The provision of these dwellings in particular the affordable units is envisaged to contribute towards reducing deprivation across the borough and in the particular identified locations, which as housing delivery increases is identified to be significant in the longer term.

### Likely Minor Beneficial Effects

#### **CS3 – Making Efficient Use of Employment Land**

10.6.3 This policy identifies that if non-productive employment land is within the town centres this can be released for more productive uses including residential development if need is demonstrated. Delivering employment opportunities has the benefit of making opportunities available for residents to seek employment, this indirectly contributes to reducing levels of deprivation.

#### **CS15 – Well designed buildings, spaces and places**

10.6.4 Residential development will be required to be designed to incorporate lifetime homes standards and deliver a percentage of wheelchair accessible housing.

## 10.7 Proposed Monitoring

10.7.1 The following indicators are proposed for monitoring purposes:

- Household size
- Household composition

- Housing tenure
- Number of households on the Housing Register
- Housing completions (including affordable housing) (NI 154, NI 155)
- NI 156 Number of households living in temporary accommodation

## 11 Cultural Heritage

### 11.1 Introduction

11.1.1 The UNESCO World Heritage Convention (1972) defines the scope of “cultural heritage” as follows:

- Monuments: architectural works, works of monumental sculpture and painting, elements or structures of an archaeological nature, inscriptions, cave dwellings and combinations of features, which are of outstanding universal value from the point of view of history, art or science;
- Groups of buildings: groups of separate or connected buildings which, because of their architecture, their homogeneity or their place in the landscape, are of outstanding universal value from the point of view of history, art or science; and
- Sites: works of man or the combined works of nature and man, and areas including archaeological sites, which are of outstanding universal value from the historical, aesthetic, ethnological or anthropological point of view.

11.1.2 Preserving the cultural and historic environment benefits communities in more than one way:

- It provides an essential educational resource for the understanding of the past and its legacy;
- It contributes to the national and local economy as it promotes tourism and provides jobs; and
- It provides people with a sense of belonging to a unique and special place – a sense of identity.

### 11.2 Environmental Protection Objectives

11.2.1 World Heritage Convention (1972):

- Calls for the identification, protection, conservation, presentation and transmission to future generations of the cultural and natural heritage sites

11.2.2 Ancient Monuments and Archaeological Areas Act (1979):

- Provides for nationally important archaeological sites to be statutorily protected as “scheduled ancient monuments” (now Scheduled Monuments)

11.2.3 Planning (Listed Buildings and Conservation Areas) Act (1990):

- Provides specific protection for buildings and areas of special architectural or historic interest

## 11.3 Context Review

11.3.1 The following are the key messages from the context review:

Message	Source
<p>The protection of the historic environment, whether individual listed buildings, conservation areas, parks and gardens, battlefields or the wider historic landscape, is a key aspect of wider environmental responsibilities, and will need to be taken fully into account both in the formulation of authorities' planning policies and in development control</p> <p>Need to assess the impact of new development on the historic environment and give cultural heritage assets full weight, alongside other considerations</p>	<p>Department of Environment (1994) <i>PPG15: Planning and the Historic Environment</i></p>
<p>Development plans should reconcile the need for development with the interests of conservation including archaeology. Detailed development plans should include policies for the protection, enhancement and preservation of sites of archaeological interest and of their settings</p> <p>Archaeological remains identified and scheduled as being of national importance should normally be earmarked for preservation</p>	<p>Department of Environment (1990) <i>PPG16: Archaeology and Planning</i></p>
<p>Recognise the historic environment's contribution to the cultural and economic well-being of the nation. Planning system should encourage new design that responds creatively to its context</p>	<p>English Heritage (2000) <i>Power of Place - The Future of the Historic Environment</i></p>
<p>Describes and analyses the particular character of a Conservation Area, including the more obvious aspects such as buildings, spaces and architectural development, as well as an attempt to portray the often less tangible qualities which make the area "special".</p>	<p>London Borough of Waltham Forest <i>Conservation Area Appraisals and Management Proposals</i></p>

## 11.4 Likely Future Conditions

11.4.1 There is unlikely to be a significant change in the current situation in relation to the cultural heritage within the Borough.

## 11.5 Environmental and Sustainability Issues

11.5.1 The following environmental and sustainability problems have been identified:

- New development should respect the character and appearance of designated Conservation Areas and the special architectural or historic interest and setting of Statutory Listed Buildings and other heritage assets.

## 11.6 Relevant SA / SEA Objectives

11.6.1 The following SA/SEA Objective is relevant to this sustainability topic:

- Objective 20 - Conserve and enhance the historic built and natural environment

## 11.7 Policy Appraisal

### Likely Significant Effects

11.7.1 No significant effects arising from the policy options on SA Objective 20 were thought likely. A number of minor effects were identified and these are discussed below.

### Likely Minor Beneficial Effects

11.7.2 Minor beneficial effects were identified for the following policies:

#### **CS12 - Protecting and Enhancing Heritage Assets**

11.7.3 This Policy is considerably stronger than the policy relating to built heritage assets that was included at the Preferred Options stage (part G of Policy CS9). The Policy recognises that evidence exists to allow a proactive approach to planning for historic character, rather than solely planning to protect designated heritage assets. There is an emphasis on taking into account what is locally important (e.g. certain areas that show 'cohesive design' from the early 20th Century, as well as what is recognised at nationally important (e.g. listed buildings and conservations areas).

11.7.4 The Policy explicitly sets out to take an approach to conserving the historic environment that seeks to increase access and ensure ongoing utility. The supporting text includes quite strong wording regarding the role of heritage in regeneration schemes.

#### **CS15 – Well designed buildings, places and spaces**

11.7.5 The policy has been revised considerably since the Preferred Options; it was previously policy CS9. Through the mechanisms in place within the policy text high quality design which responds to the local character and context and improves the function of a place will be encouraged. This focus should contribute to conserving the historic environment.

### Likely Minor Negative Effects

#### **CS2 – Improving Housing Quality and Choice**

11.7.6 There is the potential for a negative effect. The amount of new development proposed should be located and designed to ensure that it does not negatively impact upon the historic built environment.

## 11.8 Proposed Monitoring

11.8.1 The following indicators are proposed for monitoring purposes:

- Number of Listed Buildings on the 'Buildings At Risk' Register

## 12 Climate

### 12.1 Introduction

- 12.1.1 There is a general scientific consensus that Human activity has resulted in the accumulation of greenhouse gasses in the atmosphere and is causing climatic change.
- 12.1.2 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.
- 12.1.3 These impacts are likely to have a number of indirect effects. Flooding may become more frequent and severe in some areas. These would include 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.

### 12.2 Environmental Protection Objectives

- 12.2.1 The following objectives have been identified as relevant to this sustainability topic from a review of international, EU and national objectives:
- 12.2.2 Renewed EU Sustainable Development Strategy (2006):
- Kyoto Protocol commitments of the EU-15 and most EU-25 to targets for reducing greenhouse gas emissions by 2008-2012, whereby the EU-15 target is for an 8% reduction in emissions compared to 1990 levels. Aiming for a global surface average temperature not to rise by more than 2°C compared to the pre-industrial level
  - By 2010 12% of energy consumption, on average, and 21% of electricity consumption, as a common but differentiated target, should be met by renewable sources, considering raising their share to 15% by 2015
  - By 2010 5.75% of transport fuel should consist of biofuels, as an indicative target, (Directive 2003/30/EC), considering raising their proportion to 8% by 2015
  - Reaching an overall saving of 9% of final energy consumption over 9 years until 2017 as indicated by the Energy End-use Efficiency and Energy Services Directive
- 12.2.3 There is a UK domestic goal to move towards a 20 per cent reduction in emissions of carbon dioxide by 2010 when compared with 1990 levels. The UK has also announced its intention to put itself on a path towards a reduction in carbon dioxide emissions of 60 per cent by about 2050.

## 12.3 Context Review

12.3.1 The following are the key messages from the context review:

Message	Source
Energy efficiency options for new and existing buildings could considerably reduce CO <sub>2</sub> emissions with net economic benefit	International Panel on Climate Change (2007) <i>Fourth Assessment Report</i>
Developed countries commit themselves to reducing their collective emissions of six key greenhouse gases by at least 5%. Each country's emissions target must be achieved by the period 2008-2012	<i>Kyoto Protocol to the UN Framework Convention on Climate Change (1992)</i>
Promote better domestic energy efficiency. Strengthen consumer demand for energy efficiency. Improve the energy efficiency of business Prepare for the expected impacts of unavoidable climate change, developing adaptation responses	DEFRA (2006) <i>Climate Change: The UK Programme 2006</i>
Deliver patterns of urban growth and sustainable rural developments that help secure the fullest possible use of sustainable transport for moving freight, public transport, cycling and walking Secure new development and shape places that minimise vulnerability, and provide resilience, to climate change Deliver developments that make fullest possible use of sustainable transport and which reduce the need to travel. Minimise the vulnerability of new developments to climate change. Enable communities to contribute to tackling climate change. Encourage business technical innovation to mitigate and adapt to climate change	Department for Communities and Local Government (2007) <i>PPS Planning and Climate Change – Supplement to Planning Policy Statement 1</i>
Stimulate the provision of more efficient and renewable sources of energy	ODPM (2004) <i>PPS22: Renewable Energy and Planning for Renewable Energy: A companion guide to PPS22</i>
Need to reduce the carbon footprint of new housing development (all new homes are zero carbon by 2016)	Department of Communities and Local Government (2006) <i>Building a Greener Future</i>
The strategy proposes a series of risk management actions, starting with the most proactive measures and then becoming increasingly reactive: <ul style="list-style-type: none"> <li>• <b>Prevent:</b> actions taken to reduce the probability of an impact. For example, raising flood defences to prevent</li> </ul>	Mayor of London (2008) <i>The London climate change adaptation strategy, Draft report</i>

Message	Source
<p>flooding, or removing flood sensitive development from the flood plain. The key preventative action in tackling climate change is reducing greenhouse gas emissions.</p> <ul style="list-style-type: none"> <li>• <b>Prepare:</b> actions taken to better understand the risk/opportunity ahead of the change occurring and to proactively enable an effective response and recovery. For example, undertaking a flood risk assessment, developing a contingency plan, insuring sensitive assets, and raising public awareness.</li> <li>• <b>Respond:</b> actions taken in response to an event to limit the consequence of the event, for example, restricting non-essential water use during a drought, or providing emergency accommodation for people displaced by an extreme weather event.</li> <li>• <b>Recover:</b> actions taken after an event to enable a rapid and cost-effective return to normal or more sustainable state. For example, providing a local one-stop centre for flood damage claims, providing counselling for flood affected residents, or enhancing the flood resilience of a property when undertaking flood repairs.</li> </ul>	

## 12.4 Likely Future Conditions

12.4.1 Given the reliance on the private car as the main mode of transport within the Borough 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 Government policy (such as the zero carbon development agenda) to begin to stabilise and reduce emissions over time. 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 adaptation measures in light of changing environmental conditions.

## 12.5 Environmental and Sustainability Issues

12.5.1 The following environmental and sustainability problems have been identified:

- There is a reliance on the private car as the main mode of transport
- Greenhouse gas emissions need to be stabilised and reduced over time
- There will be an increasing need to plan for and implement/facilitate climate change adaptation

## 12.6 Relevant SA / SEA Objectives

12.6.1 The following SA/SEA Objectives are relevant to this sustainability topic:

- Objective 10 - Reduce greenhouse gas emissions
- Objective 11 - Conserve energy

## 12.7 Policy Appraisal

### Likely Significant Effects

#### **CS5 – Minimising and Adapting to Climate Change**

12.7.1 Since the Preferred Options, policy CS4 has been considerably revised – being separated into 4 individual policies. Policy CS5 (previously CS4) significantly benefits, over the medium to long term, in relation to the minimisation of carbon emissions and delivery of renewable energy and energy efficient developments.

#### **Recommendations**

12.7.2 Define ‘high’ environmental standards with regard to BREEAM and CSH (point B) to ensure that the mandatory standards are met (for social housing).

### Likely Minor Beneficial Effects

#### **CS1 – Location and Management of Growth**

12.7.3 Growth will be accommodated on previously developed land, which will offer benefits in relation to SA Objective 16.

#### **Recommendations**

12.7.4 The reference to climate change in relation to accommodating growth on previously developed land does not seem relevant. As the policy stands, growth on previously developed land will be accommodated by applying policy mechanisms to tackle climate change. Reference to climate change would be better placed in the first sentence of the policy e.g.” ...economic development and environmental protection while applying a range of policy mechanisms to tackle climate change locally”.

#### **CS9 – Promoting Better Education**

12.7.5 The policy requires that new education facilities are to be sustainably designed and energy efficient, thereby contributing to meeting climate change objectives.

### Likely Minor Negative Effects

#### **CS2 – Improving Housing Quality and Choice**

12.7.6 With regard to SA Objective 11 all development will increase the amount of energy used, and therefore have a negative effect. However if measures in other Core Strategy policies are enforced then energy efficiency measures and the use of low carbon and renewable technologies will be incorporated to reduce the negative effects of new development.

### **Recommendations**

12.7.7 Consider providing cross reference to CS5 - minimising and adapting to climate change.

## **12.8 Proposed Monitoring**

12.8.1 The following indicators are proposed for monitoring purposes:

- Carbon dioxide emissions (per capita)
- NI185 CO<sub>2</sub> reductions from LA operations
- NI 186 Per capita reduction in CO<sub>2</sub> emissions in the LA area
- NI188 Planning to adapt to climate change

## 13 Air

### 13.1 Introduction

- 13.1.1 Historically the main cause of poor air quality has been pollution from factories or coal burned for domestic heating. By and large, thanks to regulation and technological changes, this source of pollution is no longer a problem in the UK, however poor air quality remains an issue.
- 13.1.2 Today traffic forms the principal source of pollution. Carbon monoxide (CO), oxides of nitrogen (NOX), volatile organic compounds (VOC) and small particles (PM10) are among the pollutants emitted from vehicle exhausts. These compounds can cause severe cardiovascular and respiratory harm to people, especially in the long term, and also have adverse effects on the natural and built environment.

### 13.2 Environmental Protection Objectives

- 13.2.1 The following objectives have been identified as relevant to this sustainability topic from a review of international, EU and national objectives:
- 13.2.2 European Council Directive 96/62/EC (and daughter directives) on ambient air quality assessment and management (the 'Air Quality Framework Directive')
- 13.2.3 The Air Quality Strategy for England, Scotland, Wales and Northern Ireland (July 2007) sets pollution targets for 10 pollutants as follows:
- 13.2.4 *NB The date listed is the date by which the target should be achieved and maintained thereafter*

Pollutant	Target
<b>Benzene</b>	16.25 µg/m <sup>3</sup> (Running Annual Mean) 31 December 2003 5 µg/ m <sup>3</sup> (Annual Average) 31 December 2010
<b>1,3-Butadiene</b>	2.25 µg/ m <sup>3</sup> (Running Annual Mean) 31 December 2003
<b>Carbon monoxide</b>	10.0 mg/ m <sup>3</sup> (Maximum daily running 8 Hour Mean) 31 December 2003
<b>Lead</b>	0.5 µg/ m <sup>3</sup> (Annual Mean) 31 December 2004 0.25 µg/ m <sup>3</sup> (Annual Mean) 31 December 2008
<b>Nitrogen dioxide</b>	200 µg/ m <sup>3</sup> (1 Hour Mean) Not to be exceeded more than 18 times per year 31 December 2005 40 µg/ m <sup>3</sup> (Annual Mean) 31 December 2005
<b>Nitrogen oxides</b>	30 µg/ m <sup>3</sup> (Annual Mean) 31 December 2000
<b>Ozone</b>	100 µg/ m <sup>3</sup> (8 hour Mean) Not to be exceeded more than 10 times per year) 31 December 2005
<b>Particles (PM<sub>10</sub>)</b>	50 µg/ m <sup>3</sup> Not to be exceeded more than 35 times per year (24 Hour Mean) 31 December 2004 40 µg/ m <sup>3</sup> (Annual Mean) 31 December 2004

Pollutant	Target
<b>Particles (PM<sub>2.5</sub>)</b>	Exposure Reduction: 25 µg/ m <sup>3</sup> (Annual Mean) by 2020 Urban Areas: (Annual Mean) Target of 15% reduction in concentrations at urban background between 2010 and 2020
<b>Sulphur dioxide</b>	266 µg/ m <sup>3</sup> Not to be exceeded more than 35 times per year (15 Minute Mean) 31 December 2005 350 µg/ m <sup>3</sup> Not to be exceeded more than 24 times per year (1 Hour Mean) 31 December 2004 125 µg/ m <sup>3</sup> Not to be exceeded more than 3 times per year (24 Hour Mean) 31 December 2004 20 µg/ m <sup>3</sup> (Annual Mean) 31 December 2000 20 µg/ m <sup>3</sup> (Winter Average: 1 October - 31 March) 31 December 2000

## 13.3 Context Review

13.3.1 The following are the key messages from the context review:

Message	Source
Defines the policy framework for 12 air pollutants known to have a harmful effect on human health and the environment. The limit values for the specific pollutants are set through a series of Daughter Directives	European Commission (1996) <i>Air Quality Framework Directive (Directive 96/62/EC)</i>
The Air Quality Strategy sets out air quality objectives and policy options to further improve air quality in the UK from today into the long term. As well as direct benefits to public health, these options are intended to provide important benefits to quality of life and help to protect the environment	Department for Environment, Food and Rural Affairs (2000) <i>The Air Quality Strategy for England, Scotland, Wales and Northern Ireland. Working Together for Clean Air</i>
Pollution issues should be considered where appropriate in planning decisions. The 'Precautionary Principle' should be invoked when there is good reason to believe that harmful effects may occur to human, animal or plant health or the environment and the level of scientific uncertainty is such that risk cannot be assessed with sufficient confidence	Department for Communities and Local Government (2004) <i>PPS23 Planning and Pollution Control</i>
Reduce pollution from road traffic Reduce emissions from air travel Sustainable buildings Reduce pollution from industry and construction	Greater London Authority (2008) <i>The London Plan, Spatial Development Strategy for Greater London (consolidated with Alterations since 2004)</i>
Improve London's air quality to the point where pollution no longer poses a significant risk to human health. Since road traffic is the main source of emissions of the main pollutants of concern in London, the primary focus of the Strategy is to reduce pollution from this source. There are two ways to	Greater London Authority (2002) <i>Cleaning London's air, The Mayor's Air Quality Strategy</i>

Message	Source
<p>reduce pollution from road traffic:</p> <ul style="list-style-type: none"> <li>• Reduce the amount of traffic.</li> <li>• Reduce emissions from individual vehicles</li> </ul> <p>The Mayor's Air Quality Strategy proposes to achieve this by:</p> <ul style="list-style-type: none"> <li>• investigating the feasibility of introducing one or more low emission zones in London, which would prohibit the most polluting vehicles from specified areas</li> <li>• providing incentives for the purchase of cleaner road vehicles, for example, a 100 per cent discount for the very cleanest alternatively fuelled vehicles from central London congestion charging</li> </ul>	
<p>Monitor air pollution with a view to implementing the Council Air Quality Action Plan to reduce air pollution</p>	<p>London Borough of Waltham Forest (2004) <i>Air quality progress reports and review and assessment reports</i></p>

## 13.4 Likely Future Conditions

- 13.4.1 It is likely that air pollution will continue to be an issue within the Borough given its proximity to the strategic road network. However, 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 the pollutants of concern. A potential explanation for this are that the adaptations to vehicle technology are increasing emissions of NO<sub>2</sub> and it is increases in this source of primary NO<sub>2</sub> that is causing the exceedences at background locations. Other future conditions that are likely to effect air quality are the increase in the use of biodiesel and biomass for heating schemes<sup>21</sup>.

## 13.5 Environmental and Sustainability Issues

- 13.5.1 The following environmental and sustainability problems have been identified:
- Air pollution from the strategic road network is an issue across the Borough and, more recently, is affecting background locations.

## 13.6 Relevant SA / SEA Objectives

- 13.6.1 The following SA/SEA Objective is relevant to this sustainability topic:
- Objective 10 - Reduce greenhouse gas emissions
  - Objective 12 - Improve air quality through a reduction in traffic-based emissions

<sup>21</sup> London Borough of Waltham Forest, Air Quality Officer

## 13.7 Policy Appraisal

### Likely Significant Effect

#### **CS5 – Minimising and Adapting to Climate Change**

- 13.7.1 Since the Preferred Options, policy CS4 has been considerably revised – being separated into 4 individual policies. Proposed Submission policy CS5 (previously CS4) significantly benefits, over the medium to long term, minimisation of carbon emissions and delivery of renewable energy and energy efficient developments, thus contributing to reducing greenhouse gas emissions.

### Likely Minor Beneficial Effects

#### **CS7 – Promoting Sustainable Waste Management**

- 13.7.2 This policy now encourages the sustainable movement of waste, maximising the use of rail and water transport for movements where the waste can not be treated at source. This positively contributes to reductions in air pollution where road based HGVs are not used as frequently.

#### **CS8 – Delivering Sustainable Transport**

- 13.7.3 This policy is clearly focused on promoting sustainable transport, in particular through the location of developments and the provision of accessible and attractive routes and facilities for public transport, in particular walking and cycling. The policy also requires the production of travel plans and transport assessments. These mechanisms offer significant benefits in the long term in relation to SA Objective 12 with regard to reducing air pollution associated with transport.
- 13.7.4 The addition of reference to ‘freight’ movements in a sustainable manner also contributes to future reductions in air pollution associated with transport movements if sustainable modes can be utilised.

#### **CS14 - Creating Attractive and Vibrant Town Centres**

- 13.7.5 This Policy seeks to reinforce the existing hierarchy of centres, although there is a focus on ensuring that district Centres can progressively develop as fully functioning mixed-use and higher density urban centres with greatly enhanced public transport, access and appropriate parking facilities. It is thought that this approach of reinforcing and enhancing the hierarchy will lead to benefits in terms of a promoting mixed use development within the centres which will offer the opportunity to access services and facilities without the use of the car, therefore reducing traffic-based emissions and contributing to improving air quality.

## 13.8 Proposed Monitoring

- 13.8.1 The following indicators are proposed for monitoring purposes:
- AQMA targets
  - NO<sub>2</sub> and PM<sub>10</sub> concentrations/emissions

## 14 Soil

### 14.1 Introduction

14.1.1 Government policy promotes development on previously developed land rather than on greenfield land so as 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.

### 14.1 Environmental Protection Objectives

14.1.2 The European Soil Thematic Strategy (2006) has the following objectives:

- Establish common principles for the protection and sustainable use of soils;
- Prevent threats to soils, and mitigate the affects of those threats;
- Preserve soil functions within the context of sustainable use; and
- Restore degraded and contaminated soils to approved levels of functionality.

14.1.3 The First Soil Action Plan for England (2004-2006) has the overall guiding objective 'to protect soil and make a more sustainable use of it'.

14.1.4 Best Value Performance Indicator 106: Percentage of new homes built on previously developed land sets a Comprehensive Performance Assessment (CPA) target of 60% of new homes to be built on previously developed land.

14.1.5 Part IIA of the Environmental Protection Act requires Local Authorities to identify contaminated land in their area.

### 14.2 Context Review

14.2.1 The following are the key messages from the context review:

Message	Source
Integrate soil and land protection objectives in spatial planning strategies including promoting development on brownfield sites and clean up of contaminated land	European Commission (2004) <i>EC Communication towards a thematic strategy for soil protection</i>
Overall objective is to provide a framework for action by Member States, identifying threats to soil quality and resources and requiring measures to overcome identified issues.	European Commission (2006) <i>Proposed EU Soil Framework Directive</i>
Key areas for environmental action include soil protection and sustainable use of pesticides	European Commission (2002) <i>The Sixth Environment Action Programme of the European Community</i>
Quantify diversity, quality and extent of soils to help develop strategies to eliminate threats to	Department for Environment, Food and Rural Affairs (2005) <i>DEFRA Soil Protection</i>

Message	Source
soil and promote sustainable land management	<i>Programme</i>
To provide an improved system for the identification of land that is posing unacceptable risks to health or the environment and for securing remediation where necessary	Environmental Protection Act 1990
The presence of contaminated land can pose risk to human health and the environment. Development offers an opportunity to address contamination. Contamination can arise from natural as well as human sources. Contamination is not restricted to land with past industrial uses	Department of Communities and Local Government (2004) <i>PPS23 Planning and Pollution Control</i>
Developed to satisfy the legal requirements of the Environmental Protection Act 1990 and the Contaminated Land (England) Regulations 2000. A three stage risk based approach has been developed to identify contaminated land in the Borough. A Geographical Information System (GIS) system, desktop audits and site assessments are used to identify the presence of source, receptors and pathways to form a significant pollutant linkage	London Borough of Waltham Forest (2001) <i>Contaminated Land Strategy</i>

### 14.3 Likely Future Conditions

- 14.3.1 Although the proportion of new dwellings built on previously developed land has been extremely high 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.

### 14.4 Environmental and Sustainability Issues

- 14.4.1 No environmental and sustainability problems have been identified.

### 14.5 Relevant SA / SEA Objectives

- 14.5.1 The following SA/SEA Objective is relevant to this sustainability topic:

- Objective 15 - Reduce contamination and safeguard soil quality and quantity
- Objective 19 - Maintain and enhance the quality of the green belt and open space areas

## 14.6 Policy Appraisal

### Likely Significant Effects

#### **CS11 - Tourism Development and Visitor Attractions**

- 14.6.1 The Policy offers significant benefits in relation to SA Objective 19. It recognises that the particular assets, such as Epping Forest, Lea Valley Regional Park and Walthamstow Wetlands, associated with the District mean that there is a need to promote visitor growth outside of Walthamstow. Investment in these assets should enhance their quality and provide them with increased protection/management.

### Likely Minor Beneficial Effects

#### **CS1 – Distribution of Growth**

- 14.6.2 The policy seeks to preserve the integrity of the Green Belt and Metropolitan Open Land (MOL), positively contributing to SA Objective 19 through maintaining and enhancing the quality of the green belt.

#### **CS6 – Enhancing Green Infrastructure and Biodiversity**

- 14.6.3 This is a new policy; previously protection of the natural environment was included within Preferred Option Policy CS4. Since the Preferred Options the focus of this policy has been considerably revised. This policy offers benefits with regard to protecting the Green Belt and Metropolitan Open Land (MOL); it also seeks to protect both designated and non-designated open spaces which will form part of the green infrastructure network. Through the protection and enhancement mechanisms in place through the policy the natural environment will be conserved and enhanced.

## 14.7 Proposed Monitoring

- 14.7.1 The following indicators are proposed for monitoring purposes:
- Contaminated land
  - Development on PDL

## 15 Water

### 15.1 Introduction

- 15.1.1 Many activities have the potential to pollute water. Pollution may enter the water environment from a point source, for example effluent discharged from a pipe, or from a diffuse source, such as rainwater runoff from roads. Polluted water can be treated if it is contained; this, for instance, is what happens to sewage before it is released into the environment. Untreated pollutants can severely damage the natural environment and are a risk to human health.
- 15.1.2 Waterways can be a beneficial asset in the urban environment by providing recreational resources and areas of open space. River and canal towpaths can form a component of the pedestrian and cycle network. Waterside areas can also be attractive places to live.
- 15.1.3 Water resources and the provision of water infrastructure are issues of concern in many areas of the country given projected increases in population.
- 15.1.4 In England and Wales, around five million people live in areas at risk of flooding. The overflowing of waterways in urban areas is an issue of concern however. Flooding can also occur if when the drainage systems are unable to cope with the volume of rainfall. Parts of Waltham Forest fall into zones which are at risk of flooding.
- 15.1.5 In high-risk areas defence mechanisms can be put in place to control floods but these are costly and frequently merely transfer the problem to another location. Therefore a key aim of land use planning is ensure that flood risk is taken into account at all stages in the planning process to avoid inappropriate development in areas at risk of flooding, and to direct development away from areas at highest risk.
- 15.1.6 A Strategic Flood Risk Assessment (SFRA) will be undertaken for London Borough of Waltham Forest to inform the location for the development of land uses that are sensitive to flooding, such as housing.

### 15.2 Environmental Protection Objectives

- 15.2.1 Urban Waste Water Treatment Directive 1991:
- The Directive aims to protect the environment from the adverse effects of waste water discharges.
  - All urban waste water must undergo secondary treatment or equivalent, in particular for all discharges from agglomerations of more than 15,000 population equivalent (i.e. with a 5-day BOD of 60g of oxygen per day) and all discharges to freshwater and estuaries from agglomerations between 2,000 and 10,000 population equivalent.
- 15.2.2 Groundwater Regulations 1998:
- Impose the requirement to hold an authorisation to make discharges of certain pollutants to groundwater
- 15.2.3 Pollution Prevention and Control Regulations 2000:

- It is the implementation into England and Wales of the EC Directive 96/61/EC on Integrated Pollution Prevention and Control.
- The operation of an installation or mobile plant requires a permit from the regulator. A permit must include emission limit values for the pollutants listed in Schedule 5 of the Act (these include Air and Water pollutants). These normally apply at the point at which the emissions leave the installation or mobile plant.

#### 15.2.4 Water Framework Directive 2000:

- Aims to improve water quality and promote the sustainable use of all UK water bodies, including coastal waters, estuaries and all inland water bodies.
- It requires all UK river basins to reach "good status" by 2015, through demanding environmental objectives, including chemical, biological and physical targets.
- Three types of UK water quality standards are being developed (a formal classification instrument should be completed in late 2007): Priority substances (and Priority Hazardous Substances); Specific Pollutants; and Physico-chemical pollutants.

15.2.5 Waterways for Tomorrow 2000: DEFRA's aims for the inland waterways are to see an improving quality of infrastructure; a better experience for users through more co-operation between navigation authorities; and increased opportunities for all through sustainable development.

## 15.3 Context Review

15.3.1 The following are the key messages from the context review:

Message	Source
Provides for the management of inland surface waters, groundwater, transitional waters and coastal waters in order to prevent and reduce pollution, promote sustainable water use, protect the aquatic environment, improve the status of aquatic ecosystems and mitigate the effects of floods and droughts Need to improve the chemical quality and ecological status of surface waters	European Commission (2000) <i>Water Framework Directive (Directive 2000/60/EEC)</i>
This Directive concerns the collection, treatment and discharge of urban waste water and the treatment and discharge of waste water from certain industrial sectors. The objective of the Directive is to protect the environment from the adverse effects of the abovementioned waste water discharges	European Commission (1991) <i>Urban Wastewater Treatment Directive (Directive 91/271/EEC)</i>
To manage the risks from flooding and coastal erosion by employing an integrated portfolio of approaches which reflect both national and local priorities, so as: <ul style="list-style-type: none"> <li>• to reduce the threat to people and their</li> </ul>	Department of Environment, Food and Rural Affairs (2005) <i>Making Space for Water</i>

Message	Source
<p>property; and</p> <ul style="list-style-type: none"> <li>to deliver the greatest environmental, social and economic benefit, consistent with the Government's sustainable development principles</li> </ul>	
<p>Need to review the variation in flood risk across districts, and steer vulnerable development (e.g. housing) towards areas of lowest risk.</p>	<p>Department of Communities and Local Government (2006) <i>PPS25: Development and Flood Risk</i></p>
<p>High scoring sustainable homes would mean that about 30% of the water requirement of the home was provided from nonpotable sources such as rainwater harvesting systems or grey water recycling systems. Minimum standards include ensuring that peak run-off rates and annual volumes of run-off will be no greater than the previous conditions for the development site (reduction of surface water run-off from site using sustainable</p>	<p>Department for Communities and Local Government (2006) <i>Code for Sustainable Homes</i></p>
<p>Climate change will mean that defences will become less effective in the future. Need to make sure that:</p> <ul style="list-style-type: none"> <li>any redevelopment reduces the residual flood risk in the areas benefiting from these flood defences using the measures set out in PPS25;</li> <li>the natural flood plain is used upstream and downstream of these areas to accommodate additional floodwater.</li> </ul>	<p>Environment Agency (2007) <i>Thames Region Catchment Flood Management Plan, Summary Document</i></p>

## 15.4 Likely Future Conditions

- 15.4.1 Given the predicted changes in rainfall patterns, as outlined in Chapter 13, as a result of climatic changes it could be assumed that there will be a gradual increase in the areas that are subject to flood risk within the Borough.
- 15.4.2 River water quality has been consistently poor for the past few years and it is likely that this trend will continue. However, a great deal is being done to improve the poor river water quality in the area.
- 15.4.3 Daily domestic water use in London is currently above the national average. It is anticipated that water consumption will reduce slowly over time as more households become subject to a measured supply.

## 15.5 Environmental and Sustainability Issues

- 15.5.1 The following environmental and sustainability problems have been identified:
- Flood risk is likely to become an increasing issue

- Relatively high daily domestic water consumption will have implications for water supplies in the future
- Local rivers are subject to high levels of phosphates and nitrates which will have an affect on the ecology of the rivers and could alter the integrity of the existing ecological systems

## 15.6 Relevant SA / SEA Objectives

15.6.1 The following SA/SEA Objectives are relevant to this sustainability topic:

- Objective 13 - Improve water quality and ensure the efficient use of water resources
- Objective 14 - Reduce the risk of flooding

## 15.7 Policy Appraisal

### Likely Significant Effects

15.7.1 No significant effects arising from the policy options on SA Objectives 13 and 14 were thought likely. A number of minor effects were identified and these are discussed below.

### Likely Minor Beneficial Effects

15.7.2 Minor beneficial effects were identified for the following policies:

#### **CS5 – Minimising and Adapting to Climate Change**

15.7.3 Since the Preferred Options, policy CS4 has been considerably revised – being separated into 4 individual policies. The policy now includes reference to water efficiency, adaptation and reducing identified flood risk across the borough. Over the long term this policy should contribute towards significant improvements in water efficiency.

### Likely Minor Negative effects

#### **CS2 – Improving Housing Quality and Choice**

15.7.4 There is the potential for a negative effect with regard to the efficient use of water resources (SA Objective 13), as all development will increase the amount of water used. However if measures in other Core Strategy policies are enforced then water minimisation measures will be incorporated to reduce the negative effects of new development.

## 15.8 Proposed Monitoring

15.8.1 The following indicators are proposed for monitoring purposes:

- River water quality
- Daily domestic water use (per capita)
- Planning permission granted against the advice of the Environment Agency
- Number of properties at risk from flooding

## 16 Biodiversity

### 16.1 Introduction

- 16.1.1 Biodiversity is the variety of life on earth. The main threats to both local and global biodiversity are associated with human activities causing habitat loss/damage, loss of biodiversity, loss of protected species, disturbance to and pollution of ecosystems, risk to unprotected habitats and the impact of climate change.
- 16.1.2 While the majority of the Borough is developed there are areas of forestland, reservoirs, parks and playing fields. To the east of Waltham Forest lies Epping Forest and to the west the Lea Valley, these are both sites of international importance for nature conservation.
- 16.1.3 Preserving areas of greenery in the urban environment can enhance people's well-being and opportunities for recreation as well as providing valuable habitats for nature. Areas that are high in biodiversity are protected from development.

### 16.2 Environmental Protection Objectives

- 16.2.1 The following objectives have been identified as relevant to this sustainability topic from a review of international, EU and national objectives:
- 16.2.2 Bern Convention on the Conservation of European Wildlife and Natural Habitats, 1979:
- To protect endangered species and their habitats
- 16.2.3 (Wild) Birds Directive 79/409/EEC, 1979:
- To protect of all naturally occurring wild bird species and their habitats, with particular protection of rare species
- 16.2.4 Bonn Convention on the Conservation of Migratory Species of the Wild Animals, 1979:
- To protect threatened animals that migrate across national boundaries and/or the high seas
- 16.2.5 Habitats and Species Directive 92/43/EEC, 1992:
- To protect important natural habitat (listed in Annex I, amended in Directive 97/62/EC) and species (listed in Annex II), using measures to maintain or restore their "favourable conservation status", principally by Special Areas of Conservation, but also (through land-use and development policies) by management of the landscape features of importance to wildlife outside SACs; and
  - To safeguard species leading strict protection (Annex IV). This Directive is transposed into UK law through the Conservation (Natural Habitats &c.) Regulations, 1994
- 16.2.6 The Wildlife and Countryside Act 1981(as amended by the Countryside Rights of Way Act 2000):
- Part I is concerned with the protection of wildlife
  - Part II relates to the countryside and national parks (and the designation of protected areas)

- Part III covers public rights of way
- Part IV deals with miscellaneous provisions of the Act

## 16.3 Context Review

16.3.1 The following are the key messages from the context review:

Message	Source
Every authority must have regard to and conserve biodiversity. A list of particularly important habitats and species is published by the secretary of state, in consultation with Natural England.	Natural Environment and Rural Communities Act 2006
<ul style="list-style-type: none"> <li>• To ensure that construction, planning, development and regeneration have minimal adverse impacts on biodiversity and enhance it where possible</li> <li>• To ensure that biodiversity conservation is integral to sustainable urban communities, both on the built environment, and in parks and green spaces</li> <li>• To ensure that biodiversity conservation is integral to measures to improve the quality of people's lives</li> </ul>	Department of Environment, Food and Rural Affairs (2002) <i>Working with the grain of nature: A Biodiversity Strategy for England</i>
<ul style="list-style-type: none"> <li>• Developments should recognise the role and value of biodiversity in supporting economic development and contributing to a high quality environment</li> <li>• Previously developed land can have significant biological or geological interest and opportunities for retaining this and incorporating it into developments should be taken</li> <li>• Where a proposed development may give rise to significant harmful effects, LPAs will need to be satisfied that any reasonable alternative sites that would result in less or no harm have been fully considered</li> </ul>	Office of the Deputy Prime Minister (2005) <i>PPS9: Biodiversity and Geological Conservation and Planning for Biodiversity and Geological Conservation: A good practice guide</i>
Londoners should have ready access to wildlife and green spaces, realise the economic benefits of natural green spaces and greening	Mayor of London (2002) <i>Connecting with London's Nature: The Mayor's Biodiversity Strategy</i>
Outlines the important habitats in the Borough and the objectives, actions and targets to be achieved to conserve the habitat and associated biodiversity	London Borough of Waltham Forest, <i>Biodiversity Action Plan/Habitat Action Plans</i>

## 16.4 Likely Future Conditions

- 16.4.1 It is likely that the proportion of 'favourable' and 'unfavourable but recovering' areas within SSSIs will increase over time as better management regimes are implemented.

## 16.5 Environmental and Sustainability Issues

- 16.5.1 The following environmental and sustainability problems have been identified:

- Parts of Epping Forest are in an 'unfavourable' or 'unfavourable/declining' condition

## 16.6 Relevant SA / SEA Objectives

- 16.6.1 The following SA/SEA Objectives are relevant to this sustainability topic:

- Objective 17 - To conserve and enhance biodiversity
- Objective 18 - Protect the ecological integrity of Natura 2000 sites

## 16.7 Policy Appraisal

### Likely Significant Effects

- 16.7.1 No significant effects arising from the policy options on SA Objectives 17 and 18 were thought likely. A number of minor effects were identified and these are discussed below.

### Likely Minor Beneficial Effects

- 16.7.2 Minor beneficial effects were identified for the following policy:

#### **CS1 – Location and Management of Growth**

- 16.7.3 Regeneration development that would significant adversely affect international designations of the Lea Valley water bodies will not be permitted. Development in these areas will be required to incorporate measures necessary to avoid adverse effects on the SPA/Ramsar through proximity of development. This will offer benefits in relation to protecting the ecological integrity of Natura 2000 sites.

#### **Recommendations**

- 16.7.4 Reference to avoiding adverse effects on the SPA/Ramsar currently relates to development in regeneration areas only. It is suggested that a separate bullet point is created to ensure that all development is covered by the requirement to incorporate measures necessary to avoid adverse effects.

#### **CS6 – Enhancing Green Infrastructure and Biodiversity**

- 16.7.5 This is a new policy; previously protection of the natural environment was included within Preferred Option Policy CS4. Since the Preferred Options the focus of this policy has been considerably revised. This policy seeks to protect both designated and non-designated open spaces which will form part of the green infrastructure network. Through the protection and

enhancement mechanisms in place through the policy the natural environment will be conserved and enhanced.

#### **Recommendations**

- 16.7.6 Consider specific mention of the designated international, national, regional and local habitats and sites for biodiversity in either the policy or supporting text rather than just general references.

#### **Likely Minor Negative Effects**

##### **CS11 – Tourism Development and Visitor Attractions**

- 16.7.7 The policy seeks to promote the development of the Walthamstow Wetlands as a significant visitor destination and this is likely to have negative effects in relation to conserving and enhancing biodiversity.

#### **Recommendations**

- 16.7.8 Appropriate mitigation is required to ensure that the biodiversity features of the Walthamstow Wetlands are not affected by its promotion as a significant visitor destination.

## **16.8 Proposed Monitoring**

- 16.8.1 The following indicators are proposed for monitoring purposes:
- Condition of SSSIs / Achievement of PSA target;
  - Achievement of BAP targets and actions

## 17 Landscape and Townscape

### 17.1 Introduction

17.1.1 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>22</sup>. Landscape gives a locality its sense of place, making it different from neighbouring localities.

17.1.2 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.

### 17.2 Environmental Protection Objectives

17.2.1 European Landscape Convention (2000)

- Commits the UK to "recognise landscapes in law as an essential component of people's surroundings, an expression of the diversity of their shared cultural and natural heritage, and a foundation of their identity"

17.2.2 Planning (Listed Buildings and Conservation Areas) Act (1990):

- Provides specific protection for buildings and areas of special architectural or historic interest

17.2.3 Countryside and Rights of Way Act (2000):

- Create a framework for public access to the countryside
- Provides greater protection to Sites of Special Scientific Interest (SSSIs) and new arrangements for the management of Areas of Outstanding Natural Beauty (AONBs)
- Provides for the possibility of Conservation Area Boards for AONBs
- Management Plans receive a statutory status
- Section 85 requires public bodies to have regard to the purposes of designations of AONBs.

### 17.3 Context Review

17.3.1 The following are the key messages from the context review:

Message	Source
Challenges include: <ul style="list-style-type: none"><li>• Encouraging people to remain in, and</li></ul>	Department of Environment, Transport and the Regions (2000) <i>Urban White Paper – Our Towns and Cities: The Future Delivering an</i>

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<sup>22</sup> Landscape Character Assessment (2008) <http://www.landscapecharacter.org.uk/> Landscape Character Network

Message	Source
<p>move back into, major towns and cities, both for the benefit of our urban areas and to relieve the pressure for development in the countryside</p> <ul style="list-style-type: none"> <li>• Tackling the poor quality of life and lack of opportunity in certain urban areas</li> </ul>	<p><i>Urban Renaissance</i></p>
<p>It is essential that town centres provide a high-quality and safe environment if they are to remain attractive and competitive. Well-designed public spaces and buildings, which are fit for purpose, comfortable, safe, attractive, accessible and durable, are key elements which can improve the health, vitality and economic potential of a town centre. Policies for the design of development for main town centre uses, regardless of location, and for development in town centres, should promote high quality and inclusive design, in order to improve the character and quality of the area in which such development is located and the way it functions</p>	<p>Office of the Deputy Prime Minister (2005) <i>PPS6: Planning for Town Centres and Planning for Town Centres: Guidance on design and implementation tools</i></p>
<p>Development policies should promote opportunities for the incorporation of beneficial biodiversity and geological features within the design of development</p>	<p>Department of Communities and Local Government (2005) <i>PPS9 Biodiversity and Geological Conservation</i></p>
<p>Need to provide green and open space in support of urban renaissance and rural renewal, social inclusion, community cohesion, health and well-being. New open space/ recreation facilities should be accessible by public transport and should include provisions for disabled users</p>	<p>Office of the Deputy Prime Minister (2002) <i>PPG17 Planning for Open Space, Sport and Recreation</i></p>
<ul style="list-style-type: none"> <li>• To be a cohesive, sustainable and valued regional green lung</li> <li>• To be an area of enhanced and protected natural biodiversity for the enjoyment of all</li> <li>• To achieve full utilisation of the unique land and water assets of the Regional Park for specialist leisure and recreational facilities developed in accordance with principles of sustainability and design excellence</li> <li>• To be an accessible and permeable, integrated visitor attraction to serve the region which will include local communities</li> </ul>	<p>Lea Valley Regional Park Authority (2000) <i>Park Plan</i></p>
<p>Describes and analyses the particular character of a Conservation Area, including the more obvious aspects such as buildings, spaces and architectural development, as well as an attempt to portray the often less tangible qualities which make the area “special”.</p>	<p>London Borough of Waltham Forest <i>Conservation Area Appraisals and Management Proposals</i></p>

## 17.4 Likely Future Conditions

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

## 17.5 Environmental and Sustainability Issues

- 17.5.1 The following environmental and sustainability problems have been identified:

- Development pressure could lead to the loss of open space or recreation facilities

## 17.6 Relevant SA / SEA Objectives

- 17.6.1 The following SA/SEA Objectives are relevant to this sustainability topic:

- Objective 16 - Make the best use of previously developed land (PDL) and existing buildings
- Objective 19 - Maintain and enhance the quality of green belt and open space areas
- Objective 20 - Conserve and enhance the historic built and natural environment

## 17.7 Policy Appraisal

### Likely Significant Effects

- 17.7.1 No significant effects arising from the policy options on SA Objectives 16, 19 and 20 were thought likely. A number of minor effects were identified and these are discussed below.

### Likely Minor Beneficial Effects

- 17.7.2 Minor beneficial effects were identified for the following policies:

#### **CS1 – Distribution of Growth**

- 17.7.3 The policy seeks to preserve the integrity of the Green Belt and Metropolitan Open Land (MOL) positively contributing to SA Objective 19 through maintaining and enhancing the quality of the green belt.

#### **CS6 – Enhancing Green Infrastructure and Biodiversity**

- 17.7.4 This is a new policy; previously protection of the natural environment was included within Preferred Option Policy CS4. Since the Preferred Options the focus of this policy has been considerably revised. This policy offers benefits with regard to protecting the Green Belt and Metropolitan Open Land (MOL); it also seeks to protect both designated and non-designated open spaces which will form part of the green infrastructure network. Through the protection and enhancement mechanisms in place through the policy the natural environment will be conserved and enhanced.

#### **CS11 - Tourism Development and Visitor Attractions**

- 17.7.5 The Policy recognises that the particular assets associated with the District mean that there is a need to promote visitor growth outside of Walthamstow. Investment in these assets should

also increase the potential for local communities to access and benefit from them. This is an important objective in terms of encouraging outdoor recreation and health and well-being more generally. The unique assets identified include Epping Forest, Lea Valley Regional Park and Walthamstow Wetlands.

### **CS12 - Protecting and Enhancing Heritage Assets**

17.7.6 This Policy is considerably stronger than the policy relating to built heritage assets that was included at the Preferred Options stage (part G of Policy CS9). The Policy recognises that evidence exists to allow a proactive approach to planning for historic character, rather than solely planning to protect designated heritage assets. There is an emphasis on taking into account what is locally important (e.g. certain areas that show 'cohesive design' from the early 20th Century, as well as what is recognised at nationally important (e.g. listed buildings and conservations areas).

17.7.7 The Policy explicitly sets out to take an approach to conserving the historic environment that seeks to increase access and ensure ongoing utility. The supporting text includes quite strong wording regarding the role of heritage in regeneration schemes.

### **CS15 – Well designed buildings, places and spaces**

17.7.8 The policy has been revised considerably since the Preferred Options; it was previously policy CS9. Through the mechanisms in place within the policy text high quality design which responds to the local character and context and improves the function of a place will be encouraged. This focus should contribute to conserving the historic environment.

### **Likely Minor Negative Effects**

#### **CS2 – Improving Housing Quality and Choice**

17.7.9 There is the potential for this policy to have a negative effect, depending upon its implementation. The amount of new development proposed should be located and designed to ensure that it does not negatively impact upon the historic built and natural environment.

## **17.8 Proposed Monitoring**

17.8.1 The following indicators are proposed for monitoring purposes:

- Number and condition of Listed Buildings;
- Area and condition of open spaces;
- Development on PDL.

## 18 Waste

### 18.1 Introduction

- 18.1.1 The Environmental Protection Act 1990 identified waste as any substance that constitutes a scrap material, an effluent or other unwanted surplus. This definition was amended by the Waste Management Licensing Regulations 1994 to define waste as 'any substance or object which the producer or the person in possession of it, discards or intends or is required to discard'.
- 18.1.2 Currently over half of the rubbish, which is generate in North London is sent for disposal in landfill outside of London<sup>23</sup>. The cost of landfilling waste is likely to increase in the future and landfill availability will decrease. There is need to reduce waste generation so the volume of waste which needs to be managed is reduced and to manage waste in a more sustainable way, with an emphasis on reuse, recycling and recovery. To facilitate this Waltham Forest is working together six other North London Boroughs to produce a North London Joint Waste Strategy.
- 18.1.3 Waltham Forest is making progress towards reducing the proportion of waste that is sent to landfill. The percentage of waste that is recycled in the Borough is higher than the London average. However, the level of waste production per person in Waltham Forest is higher than nationally.

### 18.2 Environmental Protection Objectives

- 18.2.1 The EU Landfill Directive:
- By 2010 to reduce biodegradable municipal waste landfilled to 75% of that produced in 1995
  - By 2013 to reduce biodegradable municipal waste landfilled to 50% of that produced in 1995
  - By 2020 to reduce biodegradable municipal waste landfilled to 35% of that produced in 1995
- 18.2.2 The Waste Strategy 2007:
- Provide stronger incentives for businesses, local authorities and individuals to reduce waste;
  - Encourage much greater consideration of waste as a resource through increased emphasis on re-use, recycling and recovery of energy from waste;
  - Make regulation more effective so that it reduces costs to compliant businesses and the regulator while preventing illegal waste activity;
  - Target action on materials, products and sectors with greatest scope for improving environmental and economic outcomes;

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<sup>23</sup> The North London Joint Waste Strategy 2004 – 2020 <http://www.nlwa.gov.uk/jointwastestrategy/newdownload.html>

- Stimulate investment in collection, recycling and recovery infrastructure, and markets for recovered materials that will maximise the value of materials and energy recovered;
- Ensure that, if our waste is recycled overseas, it makes an environmentally sound contribution to reducing demand for global resources;
- Improve national, regional and local governance, with a clearer performance and institutional framework to deliver better coordinated action and services on the ground; and
- Increase the engagement of business and the public by communicating and supporting the changed behaviour needed by all us – with Government taking a lead.

18.2.3 Statutory targets from the Waste Strategy 2007:

- To reduce the amount of industrial and commercial waste sent to landfill by 20% by 2010 compared to 2004
- To recover value from 53% of municipal waste by 2010
- To recover value from 67% of municipal waste by 2015
- To recover value from 75% of municipal waste by 2020

18.2.4 Specific targets for recycling and composting from the Waste Strategy 2007 are:

- To re-use, recycle or compost at least 40% of household and municipal waste by 2010
- To re-use, recycle or compost at least 45% of household and municipal waste by 2015
- To re-use, recycle or compost at least 50% of household and municipal waste by 2020

## 18.3 Context Review

18.3.1 The following are the key messages from the context review:

Message	Source
<ul style="list-style-type: none"> <li>• Decouple waste growth (in all sectors) from economic growth and put more emphasis on waste prevention and re-use</li> <li>• Meet and exceed the Landfill Directive diversion targets for biodegradable municipal waste in 2010, 2013 and 2020</li> <li>• Increase diversion from landfill of non-municipal waste and secure better integration of treatment for municipal and non-municipal waste</li> <li>• Secure the investment in infrastructure needed to divert waste from landfill and for the management of hazardous waste</li> <li>• Get the most environmental benefit from that investment, through increased recycling of resources and recovery of energy from residual waste using a mix of technologies</li> </ul>	<p>Department of Environment, Food and Rural Affairs (2007) <i>Waste Strategy for England</i></p>

Message	Source
<p>Regional planning bodies and all planning authorities should, to the extent appropriate to their responsibilities, prepare and deliver planning strategies that:</p> <ul style="list-style-type: none"> <li>• help deliver sustainable development through driving waste management up the waste hierarchy, addressing waste as a resource and looking to disposal as the last option, but one which must be adequately catered for</li> <li>• provide a framework in which communities take more responsibility for their own waste, and enable sufficient and timely provision of waste management facilities to meet the needs of their communities</li> </ul>	<p>Office of the Deputy Prime Minister (2005) <i>PPS10: Planning for Sustainable Waste Management</i></p>
<p>By 2020, municipal waste should no longer compromise London's future as a sustainable city. To achieve this long-term goal, lifestyle habits must change so that we each produce only the minimum amount of waste, and reduce the pressures on our environment. We must also manage waste better, so that its impact on the local and global environment and on London communities, economy and health is minimised. This Strategy will be led by waste reduction, reuse and recycling.</p>	<p>Greater London Authority (2003) <i>Rethinking Rubbish in London, The Mayor's Municipal Waste Management Strategy</i></p>

## 18.4 Likely Future Conditions

- 18.4.1 The recent introduction of a compulsory recycling scheme is likely to increase the proportion of waste recycled.

## 18.5 Environmental and Sustainability Issues

- 18.5.1 The following environmental and sustainability problems have been identified:
- The amount of waste produced per person is not decreasing over time;
  - Although levels of recycling are increasing over time the proportion of waste recycled is not yet meeting Government targets.

## 18.6 Relevant SA / SEA Objectives

- 18.6.1 The following SA/SEA Objective is relevant to this sustainability topic:
- Objective 9 - Reduce production of waste and increase recycling

## 18.7 Policy Appraisal

### Likely Significant Effects

#### **CS7 – Promoting Sustainable Waste Management**

- 18.7.1 This is a new policy; previously sustainable waste management was included within Preferred Option Policy CS4. This policy now contains specific reference to treating waste as close to the source as possible.
- 18.7.2 This policy will over the medium to long term offer significant benefits with regard to waste minimisation and the increase of waste material recycled. This policy is dependent on the implementation of the Joint North London Waste Plan which is the overarching waste DPD for this area of London. It seeks to ensure waste minimisation in the design and construction process and encourages the use of sustainably sourced materials. Recycling storage facilities, both internal and external, for new developments are also required.
- 18.7.3 The policy now encourages the sustainable movement of waste, maximising the use of rail and water transport for movements where the waste can not be treated at source, this positively contributes to reductions in air pollution where road based HGVs are not used as frequently.

## 18.8 Proposed Monitoring

- 18.8.1 The following indicators are proposed for monitoring purposes:
- Kg waste collected per head
  - Percentage of waste recycled or composted
  - NI 191 Residual household waste per household
  - NI 192 Percentage of household waste sent for reuse, recycling and composting
  - NI 193 Percentage of municipal waste landfilled

## 19 Conclusions, Mitigation and Monitoring

19.1.1 This chapter aims to bring together the main findings of the SA. Firstly, some concluding thoughts are made regarding the sustainability of the Core Strategy as a whole. In particular, the discussion takes account of how the Core Policies will come together to deliver the growth strategy, and takes account of any cumulative effects. Following this, Table 19.1 sets out a consideration of cumulative effects. Finally, Table 19.2 sets out the key recommendations for mitigation and Table 19.3 sets out suggestions for monitoring.

### 19.2 Conclusions

19.2.1 This SA has appraised the main changes to the Core Strategy Proposed Submission document since the Preferred Options consultation in January 2010.

19.2.2 The Core Strategy is seeking to achieve a balance between physical, social and economic development and environmental protection through implementing the 16 Core Strategy Proposed Submission policies and Strategic Objectives. Sustainable development is a theme running through the individual Core policies, each contributing towards meeting their individual elements.

19.2.3 A focus of growth (housing and economic) (CS1) is through regeneration activities in the identified key growth areas within the Borough, these areas will seek to sustain a high proportion of housing and employment growth opportunities. The other town centres within the Borough are identified for retail, leisure, office, housing, community and cultural facilities to enable them to evolve as functioning mixed-use urban centres positively benefiting the vitality and viability of the town centres and the local economy through attracting new businesses to the area.

19.2.4 Policy CS1 seeks to protect employment land both SILs and other identified employment areas ensuring a continued supply of employment land opportunity across the borough. Policy CS1, CS3 and CS10 seek to encourage a mix of employment types and facilities, in particular the provision for small and medium sized enterprises and creative and cultural industries. This focus delivers the associated jobs and positively contributes to securing a buoyant and diverse local economy, as well as providing jobs that match the skills and needs of the local residents.

19.2.5 This Core Strategy Proposed Submission document makes provision for 10,320 new homes over the plan period, meeting the identified housing need. They will be delivered to meet identified housing tenures and in particular affordable units (370 a year). The delivery of new homes, at affordable prices contributes to the attractiveness of the Borough as a place to live and contributes to maintaining the economically active and skilled residents and attracts new residents to the Borough.

19.2.6 The policies deliver a framework to promote healthy lifestyles and throughout the identified regeneration projects across the Borough, aims to achieve reductions in deprivation and social exclusion. In particular policy CS1 intends to tackle deprivation through estate renewal, redevelopment of individual identified sites and improvement schemes. Health deprivation is an identified issue in Waltham Forest, with the Borough (and neighbouring Boroughs) showing the greatest cluster of health deprivation in England and Policy CS13 seeks to reduce the proliferation of any use which is seen to reduce people's ability to lead healthy lifestyles. Policies CS1 and CS4 contribute towards the delivery of community facilities including health

care facilities, these facilities should be located and existing facilities be made accessible (policy CS8) to all members of the community with a particular focus on public transport, walking and cycle. Policy CS15 requires buildings to be constructed to lifetime homes standards be wheelchair accessible and meet building for life standards, ensuring adaptations are in place to meet the needs of an aging population.

- 19.2.7 High design standards are advocated for all development and a requirement to respect local character. Regeneration areas are required to focus land-uses to minimise the likelihood of anti-social behaviour. All new developments are required to implement designing out crime principles; policies are also looking to promote safer streets and public realm improvements in particular areas with identified high levels of crime.
- 19.2.8 The Core Strategy (Proposed Submission) is focused on the achievement of sustainable development. Policies CS5 – 8 focus on the individual aspects (Climate Change, Waste, Sustainable Transport, Green Infrastructure and Biodiversity) and policy CS15 focuses on the design aspects. The Borough is looking to tackle climate change locally by promoting resource efficiency and high environmental development standards during the design, construction and occupation of new developments. Through requiring new developments to minimise on-site carbon emission, requiring energy efficiency measures to be incorporated into new and retrofitted developments the Borough is looking to significantly reduce its greenhouse gas emissions levels. Increased growth will lead to greater resource use (notably water consumption and leading to increased waste production), even though the policies (CS5 and CS7) look to achieve efficiency in these, increased pollution is however inevitable. Greenhouse gas emissions associated with new developments will still continue until the highest ratings in Code for Sustainable Homes (CSH) and BREEAM are mandatory at which time they may plateau.
- 19.2.9 Policy CS8 is clearly focused on promoting sustainable transport, in particular through focusing development in accessible locations and the provision of accessible and attractive routes and facilities for public transport, walking and cycling. Identified public transport improvements are illustrated within policy CS1 these will contribute towards improved accessibility of local services and employment locations. Community facilities and other social infrastructure will through the policy mechanisms be located in accessible locations and connected to public transport, pedestrian and cycle networks, positively benefiting SA Objective 8.
- 19.2.10 The Borough contains, and is situated within, high quality natural environment. The Green Belt and MOL will continue to be protected and any losses resisted unless clearly required (Thames Water). Policy CS6 as well as providing protection of the Green Belt and MOL as identified above, also seeks to protect designated and non-designated open spaces which form part of the green infrastructure network and deliver essential areas of open space for recreational purposes. Tourism within the Borough does rely considerably on the identified important natural and ecological assets (Epping Forest, Lea Valley Regional Park and Walthamstow Wetlands).
- 19.2.11 A stronger focus on the historical environment has been developed through the creation of Policy CS12 since the Preferred Options policy version. There is an emphasis on taking into account what is locally important as well as the nationally important conservation areas and listed buildings. The policy specifically sets out a framework for conserving the historic environment and heritage within the Boroughs regeneration schemes.

## 19.3 Cumulative effects

19.3.1 Table 19.1 below discusses the cumulative effects of the policies.

**Table 19.1 Cumulative Effects**

SA Objective	Cumulative effects
1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	Policy CS2 over the medium to long term delivers significant benefits with regard to delivering the housing allocation for the Borough and providing the policy context to enable housing to be provided at the correct tenure and dwelling size to meet the needs of residents. Policy CS1 provides the locational framework which over the long term enables housing to be delivered in accordance with the allocations delivering a significant benefit. Policy CS3 enables residential development to be provided in areas of redundant employment floorspace. These three policies cumulatively deliver significant benefits over the medium to long term.
2. Reduce crime and the fear of crime	The creation of safe and secure communities is fundamental to the delivery of policies CS15 and CS16 over the plan period significant benefits should be achieved through these policies.
3. Improve standard of health and wellbeing of those who live and work in the Borough	<p>A number of proposed Core Strategy policies together contribute towards improving the health and wellbeing of those who live and work in the Borough. Significant benefits have been identified with regard to policy CS13 as this is focused on promoting health and fitness, however through the implementation of other policies additional benefits have been identified which cumulatively contribute towards beneficial achievement of this objective.</p> <p>Policy CS1 provides the framework for delivering social infrastructure, in particular health care facilities. High design standards are required through policy CS15 and CS16. Policy CS2 is the mechanism for delivering homes to lifetime home standards and providing wheelchair accessible housing contributing towards planning for an aging population. Healthy lifestyles and activities are promoted through CS6, CS11 and CS13; open spaces, recreation facilities and other sporting and natural environment areas are to be given continued protection and enhanced where required. Policy CS8 through the provision of attractive and accessible public transport routes and facilities walking and cycling to community facilities and other social infrastructure should be accessible to all.</p>
4. Increase the provision of and access to community facilities to meet local cultural, recreational and social needs.	Policy CS4 is the main delivery mechanism for community and cultural facilities. However, policies CS1, CS6, CS8, CS11, CS12, CS13, CS14 and CS15 together require accessible, high quality and well designed community facilities, delivering cumulative beneficial effects.

SA Objective	Cumulative effects
5. Improve educational attainment in schools.	Policy CS9 seeks to promote better education facilities. No cumulative effects have been identified.
6. Improve opportunities for access to education and training for all residents.	Policy CS4 seeks to increase accessibility of community facilities and providing facilities which can be multi-purpose. Policy CS9 is delivering the framework for education and training opportunities. Policy CS10 seeks to encourage training schemes and provide links with employers and on the job training programmes. These policies together deliver opportunities for residents to access education and training opportunities.
7. Reduce the overall level of deprivation.	Policy CS1 seeks to tackle deprivation through estate renewal. Making employment land available (CS3) and securing more jobs for people, particularly within identified regeneration areas contributes towards providing opportunities to (re)enter the workforce.
8. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system.	Policy CS8 is the main policy to focus on the sustainable transport system however, policies CS1, CS4, CS9, CS10 and CS13 seek to ensure that employment and social infrastructure and other local services are accessible to all through public transport network.
9. Reduce production of waste and increase recycling.	Policy CS7 is the main policy that focuses on sustainable waste management. No cumulative effects have been identified.
10. Reduce greenhouse gas emissions.	Policy CS5 is the main delivery mechanism for minimising and adapting to climate change. Policy CS8 requires sustainable transport to be promoted and other policies encourage accessible developments and the use of public transport and walking and cycling modes therefore contributing to reductions in air pollution and contributing greenhouse gases.
11. Conserve energy.	Policy CS5 is the main delivery mechanism for minimising and adapting to climate change. Policy CS9 requires energy efficient design to be incorporated into schools. These deliver beneficial effects.
12. Improve air quality through a reduction in traffic-based emissions.	Policy CS7 seeks to encourage the use of sustainable transport modes where feasible for the transportation of waste and to treat waste at source where possible. Policy CS8 advocates sustainable transport. These policies together contribute to reductions in traffic based emissions.
13. Improve water quality and ensure the efficient use of water resources.	Policy CS5 is the main policy mechanism for water efficiency and adaptation. No cumulative effects are identified.
14. Reduce the risk of flooding.	Policy CS5 is the main policy mechanism for reducing and adapting to flood risk issues. No cumulative effects are identified.

SA Objective	Cumulative effects
15. Reduce contamination and safeguard soil quality and quantity.	No cumulative effects identified
16. Make the best use of previously developed land (PDL) and existing buildings.	Policy CS2 requires the effective and efficient use of land particularly unused or underused PDL. Policy CS4 seeks to improve existing community buildings and amalgamate where feasible community facilities into accessible locations. Policy CS14 seeks to regenerate and improve identified town and district centres making the most effective use of existing buildings and PDL. These policies together seek to make the best use of PDL and existing buildings.
17. Conserve and enhance biodiversity.	Policy CS6 is the main policy mechanism for achieving this SA Objective. No cumulative effects are identified.
18. Protect the ecological integrity of Natura 2000 sites.	Policy CS6 is the main policy mechanism for achieving this SA Objective. No cumulative effects are identified.
19. Maintain and enhance the quality of the green belt and open space areas.	Policy CS1 seeks to preserve the integrity of the Green Belt and MOL, policy CS6 also protects and seeks to enhance the Green Belt and MOL and other designated and non-designated open spaces. Policy CS11 identifies many of the boroughs natural open spaces and countryside as tourist destinations and seeks enhancement and preservation of these where required. These policies cumulative deliver benefits over the plan period with regard to this SA Objective.
20. Conserve and enhance the historic built and natural environment.	Policy CS12 is the main policy for protecting and maintaining the Boroughs built heritage assets. However, policy CS11 seeks protection of certain natural and built environment assets and policy CS15 seeks high quality design which takes into account local character.
21. Maintain and enhance the vitality and viability of the Borough's town centres.	Policy CS14 is main policy mechanism for delivering vibrant town centres, however policy CS15 seeks to achieve high quality design and respect the local character.
22. Improve the local economy by attracting inward investment.	Policy CS1 provides the framework for development locations across the borough and the regeneration agenda. Policies CS3 and CS10 focuses on key economic growth factors and delivery of employment opportunities which in turn contribute to the local economy. Enhancing the tourism attractions of the borough brings in inward investment.
23. Maintain stable levels of employment in the Borough.	Policy CS1 seeks to protect identified employment land in the Borough. Policy CS3 focuses on delivery of a mix of employment facilities and types. Policy CS10 seeks to maximise employment opportunities for the Boroughs residents. These policies together contribute towards maintaining the employment levels in the borough.

## 19.4 Mitigation

19.4.1 Table 19.2 below outlines the proposed mitigation recommendations.

**Table 19.2 Proposed mitigation recommendations**

Policy	Recommendations proposed	Council's Response
CS1	<p>The reference to climate change in relation to accommodating growth on previously developed land does not seem relevant. As the policy stands, growth on previously developed land will be accommodated by applying policy mechanisms to tackle climate change. Reference to climate change would be better placed in the first sentence of the policy e.g. "...economic development and environmental protection while applying a range of policy mechanisms to tackle climate change locally".</p> <p>Reference to avoiding adverse effects on the SPA/Ramsar currently relates to development in regeneration areas only. It is suggested that a separate bullet point is created to ensure that all development is covered by the requirement to incorporate measures necessary to avoid adverse effects.</p>	
CS2	Consider providing cross reference to CS5 - minimising and adapting to climate change, CS6 – enhancing green infrastructure and biodiversity and CS7 - promoting sustainable waste management and recycling.	
CS3	None proposed	
CS4	None proposed	
CS5	Define 'high' environmental standards with regard to BREEAM and CSH (point B) to ensure that the mandatory standards are met (for social housing).	
CS6	Consider specific mention of the designated international, national, regional and local habitats and sites for biodiversity in either the policy or supporting text rather than just general references.	
CS7	None proposed	
CS8	None proposed	
CS9	None proposed	
CS10	None proposed	

Policy	Recommendations proposed	Council's Response
CS11	Appropriate mitigation is required to ensure that the biodiversity features of the Walthamstow Wetlands are not affected by its promotion as a significant visitor destination.	
CS12	None proposed	
CS13	The policy references 'proliferation of unhealthy uses' but the supporting text indicates that this refers only to hot food takeaways. If this is the case then perhaps the policy should be amended to state it is the proliferation of hot food takeaways that is the issue.	
CS14	There is no evidence to suggest that any altered or alternative approach would be preferable.	
CS15	None proposed	
CS16	None proposed	

## 19.5 Monitoring

19.5.1 The SEA Regulations require the monitoring of the significant effects of plans and programmes in order to identify unexpected adverse effects. Table 19.3 summarises the recommendations for monitoring, covering the identified sustainability problems in Waltham Forest and likely significant effects of the Core Strategy Proposed Submission document. The Council will take a final decision concerning the monitoring measures for the Sustainability Appraisal before adoption of the Core Strategy.

**Table 19.3 Proposed Monitoring**

Sustainability Issue / Significant Effect	Monitoring Proposals	Current monitoring regime of the Council
<b>Population</b>		
An increasing population will require additional housing and infrastructure to cater for their needs	<ul style="list-style-type: none"> <li>- Number of households on the Housing Register</li> <li>- Housing completions (including affordable housing)</li> </ul>	<ul style="list-style-type: none"> <li>- Monitored under HSSA</li> <li>- Being monitored by AMR as NI155</li> </ul>
The population density is already high compared with London and England as a whole. An increasing population will increase the pressure on existing housing and infrastructure and additional development is likely to result in an increase in the population density.	<ul style="list-style-type: none"> <li>- Population (by age group)</li> <li>- Population density</li> <li>- Household size</li> <li>- Household composition</li> </ul>	<ul style="list-style-type: none"> <li>- being monitored by AMR as contextual indicators</li> <li>- Household size - being monitored by GLA population projections as contextual indicators</li> <li>- Household composition - being monitored by GLA population projections as contextual indicators</li> </ul>
<b>Health</b>		
Life expectancy is lower than the average for London and the rest of the country	<ul style="list-style-type: none"> <li>- Life expectancy</li> <li>- Infant mortality</li> <li>- NI 120 All age cause mortality rate</li> </ul>	<ul style="list-style-type: none"> <li>- Life expectancy – being monitored by NHS WF AMR</li> <li>- Infant mortality - being monitored by NHS WF AMR</li> <li>- NI 120 All age cause mortality rate – being monitored by Corporate Performance Plan</li> </ul>
Health inequalities for BME groups	<ul style="list-style-type: none"> <li>- Tuberculosis infections</li> <li>- HIV infections</li> <li>- Teenage conception rates, NI 112</li> </ul>	<ul style="list-style-type: none"> <li>- Tuberculosis infections - being monitored by NHS WF AMR</li> <li>- HIV infections - being monitored by NHS WF AMR</li> <li>- Teenage conception rates, NI 112 - being monitored by NHS WF AMR</li> </ul>

Sustainability Issue / Significant Effect	Monitoring Proposals	Current monitoring regime of the Council
Southern part of the Borough is subject to higher levels of poor health, which has been associated with deprivation, poverty and overcrowding	<ul style="list-style-type: none"> <li>- Tuberculosis infections</li> <li>- HIV infections</li> <li>- Teenage conception rates NI 112</li> <li>- IMD rating</li> <li>- NI 119 self reported measure of people's overall health and well-being</li> </ul>	<ul style="list-style-type: none"> <li>- Tuberculosis infections - being monitored by NHS WF AMR</li> <li>- HIV infections - being monitored by NHS WF AMR</li> <li>- Teenage conception rates NI 112 - being monitored by NHS WF AMR</li> <li>- IMD rating – being monitored in the AMR as contextual indicators</li> <li>- NI 119 self reported measure of people's overall health and well-being - being monitored by Corporate Performance Plan</li> </ul>
<p><u>CS13 – Promoting Health and Fitness</u> This policy seeks to ensure that health is central to spatial planning, the policy is predicted to deliver significant beneficial effects.</p>	<ul style="list-style-type: none"> <li>- NI 119 self reported measure of people's overall health and well-being</li> </ul>	<ul style="list-style-type: none"> <li>- Not monitored through the AMR but NI 119 self reported measure of people's overall health and well-being - being monitored by Corporate Performance Plan</li> </ul>
<b>Economy</b>		
Low levels of economic growth in the Borough	<ul style="list-style-type: none"> <li>- VAT registrations and deregistrations</li> <li>- Vacant premises</li> <li>- NI 171 New business registration rate</li> <li>- NI 172 % of small businesses in an area showing employment growth</li> </ul>	<ul style="list-style-type: none"> <li>- L6 - Number of VAT registered businesses</li> <li>- BD1 - Total amount of additional employment floorspace – by type</li> <li>- BD2 - Total Amount of employment floorspace on previously developed land – by type</li> <li>- BD3 - Employment land available by type</li> <li>- Vacant premises – being monitored by surveys and employment studies</li> </ul>
Declining industrial sectors and under-representation of growth sectors	<ul style="list-style-type: none"> <li>- Employment by sector</li> <li>- Employment by occupation</li> </ul>	<ul style="list-style-type: none"> <li>- L1 - Losses of employment land in (i) employment/regeneration areas and (ii)</li> </ul>

Sustainability Issue / Significant Effect	Monitoring Proposals	Current monitoring regime of the Council
		local authority area.
<b>Employment and Skills</b>		
Average salaries for those working in Waltham Forest are lower than average salaries for those living in the Borough. This disparity could affect the Borough's ability to attract inward investment	- Residence and work-based earnings	- Not monitored through the AMR but being monitored by corporate performance plan
Unemployment levels are higher than the average for Great Britain	- Economic activity rates - Employment by occupation - NI 117 – 16 to 18 year olds who are in education, employment or training (NEET) - NI 151 Overall employment rate (working age)	- L3 - Unemployment and employment figures of the AMR - Economic activity rates - monitored by corporate performance plan - Employment by occupation - NOIS reports for workforce - NI 117 – 16 to 18 year olds who are in education, employment or training (NEET) - monitored by corporate performance plan - NI 151 Overall employment rate (working age) - being monitored by corporate performance plan
Educational attainment is relatively low and a high proportion of people have no qualifications	- Qualifications achieved - NI 073, 075, 076, 079, 080, 090, 091, 106, 108, 163-165	- L4 - Skills level of residents by type - L21 - Percentage of pupils achieving 5 or more GCSEs at grades A-C or equivalent - NI 073, 075, 076, 079, 080, 090, 091, 106, 108, 163-165 - being monitored by corporate performance plan
<u>CS1 – Distribution of Growth</u> <u>CS3 – Making Efficient use of Employment Land</u>	- Monitoring indicators as above	

Sustainability Issue / Significant Effect	Monitoring Proposals	Current monitoring regime of the Council
<p><u>CS9 – Promoting Better Education</u> <u>CS10 - Creating More Jobs and Reducing Worklessness</u></p> <p>These policies seek to protect employment land significantly protecting the borough’s employment land opportunities. Deliver a focus on mixed employment sites and provision for small to medium enterprises maximising employment opportunities.</p>		
<b>Transport and Accessibility</b>		
<p>Reliance on the private car as the main mode of transport, contributing to air pollution, greenhouse gas emissions and congestion</p>	<ul style="list-style-type: none"> <li>- Travel to work by mode</li> <li>- Number of cars/vans per household</li> <li>- NI 167 Congestion – average journey time per mile during the morning peak</li> </ul>	<ul style="list-style-type: none"> <li>- Number of residential units in car free developments</li> <li>- L24 - Percentage of completed non-residential development complying with parking standards in the UDP</li> <li>- NI 167 Congestion – average journey time per mile during the morning peak - being monitored by corporate performance plan</li> </ul>
<p>Increasing car ownership, personal wealth and population is expected to place further demands on the local transport network leading to increased congestion and time spent travelling.</p>	<ul style="list-style-type: none"> <li>- Travel to work by mode</li> <li>- Number of cars/vans per household</li> </ul>	
<p>Expansion of the transport network could require additional land that may otherwise have been given to other uses</p>	<ul style="list-style-type: none"> <li>- No indicator identified</li> </ul>	
<p><u>CS8 – Delivering Sustainable Transport</u> This policy focuses on promoting sustainable</p>		<ul style="list-style-type: none"> <li>- L26 - Percentage of applications with an Section106 agreement to improve walking/</li> </ul>

Sustainability Issue / Significant Effect	Monitoring Proposals	Current monitoring regime of the Council
transport delivering significant benefits.		cycle environment
<b>Crime and Safety</b>		
Crime levels are generally higher in Waltham Forest than nationally	<ul style="list-style-type: none"> <li>- Level of crime</li> <li>- National Indicators NI 015-017, 028, 029, 034</li> </ul>	<ul style="list-style-type: none"> <li>- Level of crime – being monitoring in AMR as contextual indicators</li> <li>- National Indicators NI 015-017, 028, 029, 034 – being monitored by corporate performance plan</li> </ul>
<u>CS16 – Making Waltham Forest Safer</u> This policy should contribute towards delivering significant benefits through the implementation of designing out crime principles in all new developments.	<ul style="list-style-type: none"> <li>- Implementation of designing out crime measures</li> </ul>	<ul style="list-style-type: none"> <li>- Non identified through the AMR</li> </ul>
<b>Housing</b>		
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	<ul style="list-style-type: none"> <li>- Number of households on the Housing Register</li> <li>- Housing cost to income ratio</li> <li>- Housing completions (including affordable housing), NI 154, 155</li> </ul>	<ul style="list-style-type: none"> <li>- H1 - Plan period and housing targets</li> <li>- H2 (a) Net additional dwellings – in previous 5 years</li> <li>- H2 (b) NI 154 - Net additional dwellings for the reporting year</li> <li>- H2 (c) Net additional dwellings – in future years</li> <li>- H9 - Affordable housing provided through planning permission i) Completion, ii) Type and tenure</li> <li>- NI 155</li> <li>- Number of households on the Housing Register – being monitored by HSSA</li> <li>- Housing completions (including affordable</li> </ul>

Sustainability Issue / Significant Effect	Monitoring Proposals	Current monitoring regime of the Council
		housing), NI 154, 155 – being monitored by AMR
There is a potential shortfall in the provision of family accommodation	<ul style="list-style-type: none"> <li>- Household size</li> <li>- Household composition</li> <li>- Housing tenure</li> </ul>	<ul style="list-style-type: none"> <li>- L10 - Number of housing developments by Type</li> </ul>
There is a shortfall in the provision of affordable housing to meet the requirements of those in housing need	<ul style="list-style-type: none"> <li>- Number of households on the Housing Register</li> <li>- Housing completions (including affordable housing)</li> <li>- NI 156 Number of households living in temporary accommodation</li> </ul>	<ul style="list-style-type: none"> <li>- H9 - Affordable housing provided through planning permission i) Completion, ii) Type and tenure</li> <li>- NI 155</li> <li>- Housing completions (including affordable housing) – being monitored by AMR</li> <li>- NI 156 Number of households living in temporary accommodation – being monitored by corporate performance plan</li> </ul>
<p><u>CS1 – Delivery of Growth</u></p> <p><u>CS2 – Improving Housing Quality and Choice</u></p> <p>These policies will over the plan period deliver the housing allocations and housing to meet the identified housing need, contributing significant benefits.</p>	<ul style="list-style-type: none"> <li>- Monitoring as proposed above</li> </ul>	
<b>Cultural Heritage</b>		
New development should respect the character and appearance of designated Conservation Areas and the special architectural or historic interest and setting of Statutory Listed Buildings and other heritage assets	<ul style="list-style-type: none"> <li>- No indicator identified</li> </ul>	<ul style="list-style-type: none"> <li>- L34 - Number of approvals in conservation areas.</li> <li>- L35 - Number of approvals for listed buildings.</li> </ul>
<b>Climate</b>		

Sustainability Issue / Significant Effect	Monitoring Proposals	Current monitoring regime of the Council
There is a reliance on the private car as the main mode of transport	<ul style="list-style-type: none"> <li>- Travel to work by mode</li> <li>- Number of cars/vans per household</li> </ul>	- See transport monitoring indicators
Greenhouse gas emissions need to be stabilised and reduced over time	<ul style="list-style-type: none"> <li>- Carbon dioxide emissions (per capita)</li> <li>- NI 185 CO<sub>2</sub> reduction from Local Authority operations</li> <li>- NI 186 per capita reduction in CO<sub>2</sub> emissions in the Local Authority Area</li> <li>- Carbon dioxide emissions (by sector)</li> </ul>	<ul style="list-style-type: none"> <li>- NI 185</li> <li>- NI 186</li> </ul>
There will be an increasing need to plan for and implement/facilitate climate change adaptation	<ul style="list-style-type: none"> <li>- NI 188 Planning to adapt to climate change</li> </ul>	- NI 188
<p><u>CS5 – Minimising and Adapting to climate Change</u></p> <p>This policy should over the medium to long term deliver significant benefits in terms of minimising carbon emissions and the delivery of renewable energy and energy efficient development.</p>	<ul style="list-style-type: none"> <li>- As per monitoring indicators above</li> </ul>	
<b>Air</b>		
Air pollution from the strategic road network is an issue across the Borough and, more recently, is affecting background locations	<ul style="list-style-type: none"> <li>- AQMA targets</li> <li>- NO<sub>2</sub> and PM<sub>10</sub> concentrations/emissions</li> </ul>	- Not monitored (monitored by another Council Department)
CS5 - This policy should over the medium to long term deliver significant benefits in terms of minimising carbon emissions, thus contributing to reducing greenhouse gas emissions.	<ul style="list-style-type: none"> <li>- Carbon dioxide emissions (per capita)</li> <li>- NI 185 CO<sub>2</sub> reduction from Local Authority operations</li> <li>- NI 186 per capita reduction in CO<sub>2</sub> emissions in the Local Authority Area</li> </ul>	<ul style="list-style-type: none"> <li>- NI 185</li> <li>- NI 186</li> </ul>

Sustainability Issue / Significant Effect	Monitoring Proposals	Current monitoring regime of the Council
	- Carbon dioxide emissions (by sector)	
Soil		
No sustainability issues or significant effects identified	No monitoring proposed	
Water		
Flood risk is likely to become an increasing issue	- Planning permission granted against the advice of the Environment Agency - Number of properties at risk from flooding	- E1 - No. of permissions granted contrary to the advice of the Environment Agency on either flood defence or water quality grounds
Relatively high daily domestic water consumption will have implications for water supplies in the future	- Daily domestic water use (per capita)	- Not monitored (monitored by EA)
Local rivers are subject to high levels of phosphates and nitrates which will have an affect on the ecology of the rivers and could alter the integrity of the existing ecological systems	- River water quality	- Not monitored (monitored by EA)
Biodiversity		
Parts of Epping Forest are in an 'unfavourable' or 'unfavourable/declining' condition	- Condition of SSSIs / Achievement of PSA target	- E2 - Change in areas of biodiversity importance - NI 197 Improved local biodiversity – active management of local sites. - L28 - Change in priority habitats and species by type - L30 - List of vulnerable species and safeguarded habitats in Waltham Forest

Sustainability Issue / Significant Effect	Monitoring Proposals	Current monitoring regime of the Council
Landscape and Townscape		
Development pressure could lead to the loss of open space or recreation facilities	<ul style="list-style-type: none"> <li>- Area and condition of open spaces</li> <li>- Development on PDL.</li> </ul>	<ul style="list-style-type: none"> <li>- L26 - Number and size of protected areas within the borough</li> <li>- L27 - Number of major housing approvals on protected land.</li> </ul>
Waste		
The amount of waste produced per person is not decreasing over time	<ul style="list-style-type: none"> <li>- Kg waste collected per head</li> <li>- NI 191 Residual household waste per household</li> <li>- NI 193 Percentage of municipal waste landfilled</li> </ul>	<ul style="list-style-type: none"> <li>- NI 191, 193</li> <li>- L36 - Kg of household waste collected per head (Target of not more than 455 kg per head required).</li> </ul>
Although levels of recycling are increasing over time the proportion of waste recycled is not yet meeting Government targets.	<ul style="list-style-type: none"> <li>- Percentage of waste recycled or composted</li> <li>- NI 192 Percentage of household waste sent for reuse, recycling and composting</li> </ul>	<ul style="list-style-type: none"> <li>- NI 192</li> </ul>
<p><u>CS7 – Promoting Sustainable Waste Management</u></p> <p>This policy will offer significant benefits with regard to waste minimisation and the increase of waste material recycled.</p>	<ul style="list-style-type: none"> <li>- As per monitoring proposals above</li> </ul>	

## 19.6 Core Strategy Submission

- 19.6.1 Following the consultation on the Core Strategy Proposed Submission document the Council will consider the comments received on both the SA Report and the draft Core Strategy and submit these responses to the Planning Inspector. The Submission Core Strategy will then be the subject of an Examination in Public where a Planning Inspector will determine the 'soundness' of the document and will recommend its adoption or modification.
- 19.6.2 Following adoption of the Core Strategy a Sustainability Appraisal Statement will be produced summarising the SA process and defining ongoing monitoring that will be undertaken by the Council.

## Appendix 1 – Monitoring Framework

Indicator	Relevant Objective
Population (by age group)	None identified
Population density	None identified
Ethnicity of population	None identified
Life expectancy	<ul style="list-style-type: none"> <li>• Improve the health and wellbeing of those who live and work in the Borough</li> <li>• Improve air quality through a reduction in traffic-based emissions</li> <li>• Improve opportunities for access to local services, facilities and employment through an integrated transport system</li> </ul>
Mortality rates from circulatory disease and cancer	<ul style="list-style-type: none"> <li>• Improve the health and wellbeing of those who live and work in the Borough</li> </ul>
Infant mortality	<ul style="list-style-type: none"> <li>• Improve the health and wellbeing of those who live and work in the Borough</li> <li>• Improve opportunities for access to local services, facilities and employment through an integrated transport system</li> </ul>
Teenage conception rates	<ul style="list-style-type: none"> <li>• Improve the health and wellbeing of those who live and work in the Borough</li> <li>• Improve opportunities for access to local services, facilities and employment through an integrated transport system</li> </ul>
Tuberculosis infections	<ul style="list-style-type: none"> <li>• Improve the health and wellbeing of those who live and work in the Borough</li> <li>• Improve opportunities for access to local services, facilities and employment through an integrated transport system</li> </ul>
HIV infections	<ul style="list-style-type: none"> <li>• Improve the health and wellbeing of those who live and work in the Borough</li> <li>• Improve opportunities for access to local services, facilities and employment through an integrated transport system</li> </ul>
VAT registrations and deregistrations	<ul style="list-style-type: none"> <li>• Improve the local economy by attracting inward investment</li> </ul>
Vacant premises	<ul style="list-style-type: none"> <li>• Maintain and enhance the vitality and viability of the Borough's town centres</li> <li>• Improve the local economy by attracting inward investment</li> <li>• Maintain stable levels of employment in the Borough</li> </ul>
Residence and work-based earnings	<ul style="list-style-type: none"> <li>• Reduce the overall level of deprivation</li> </ul>
Economic activity rates	<ul style="list-style-type: none"> <li>• Reduce the overall level of deprivation</li> <li>• Maintain stable levels of employment in the Borough</li> <li>• Improve the local economy by attracting inward investment</li> </ul>
Employment by occupation	<ul style="list-style-type: none"> <li>• Improve opportunities for access to education and training for all residents</li> </ul>

Indicator	Relevant Objective
	<ul style="list-style-type: none"> <li>• Maintain stable levels of employment in the Borough</li> </ul>
Qualifications	<ul style="list-style-type: none"> <li>• Improve educational attainment in schools</li> <li>• Improve opportunities for access to education and training for all residents</li> <li>• Maintain stable levels of employment in the Borough</li> </ul>
Travel to work by mode	<ul style="list-style-type: none"> <li>• Reduce greenhouse gas emissions</li> <li>• Improve opportunities for access to local services, facilities and employment through an integrated transport system</li> </ul>
Number of cars/vans per household	<ul style="list-style-type: none"> <li>• Reduce greenhouse gas emissions</li> <li>• Improve opportunities for access to local services, facilities and employment through an integrated transport system</li> </ul>
Level of crime	<ul style="list-style-type: none"> <li>• Reduce crime and the fear of crime</li> </ul>
Household size	<ul style="list-style-type: none"> <li>• Meet local housing needs through the provision of a range of tenures and sizes of new dwellings</li> <li>• Reduce the overall level of deprivation</li> </ul>
Household composition	<ul style="list-style-type: none"> <li>• Meet local housing needs through the provision of a range of tenures and sizes of new dwellings</li> </ul>
Housing tenure	<ul style="list-style-type: none"> <li>• Meet local housing needs through the provision of a range of tenures and sizes of new dwellings</li> </ul>
Number of households on the Housing Register	<ul style="list-style-type: none"> <li>• Meet local housing needs through the provision of a range of tenures and sizes of new dwellings</li> <li>• Reduce the overall level of deprivation</li> </ul>
Housing cost to income ratio	<ul style="list-style-type: none"> <li>• Reduce the overall level of deprivation</li> </ul>
Housing completions (including affordable housing)	<ul style="list-style-type: none"> <li>• Meet local housing needs through the provision of a range of tenures and sizes of new dwellings</li> </ul>
Number and condition of Listed Buildings	<ul style="list-style-type: none"> <li>• Conserve and enhance the historic built and natural environment</li> </ul>
Carbon dioxide emissions (per capita)	<ul style="list-style-type: none"> <li>• Reduce greenhouse gas emissions</li> <li>• Conserve energy</li> </ul>
Air Quality Management Area (AQMA) targets	<ul style="list-style-type: none"> <li>• Improve air quality through a reduction in traffic-based emissions</li> <li>• Reduce greenhouse gas emissions</li> </ul>
Contaminated land	<ul style="list-style-type: none"> <li>• Maintain and enhance the quality of the green belt and open space areas</li> <li>• Reduce contamination and safeguard soil quality and quantity</li> </ul>
Development on previously developed land (PDL)	<ul style="list-style-type: none"> <li>• Maintain and enhance the quality of the green belt and open space areas</li> <li>• Reduce contamination and safeguard soil quality and quantity</li> </ul>
River water quality	<ul style="list-style-type: none"> <li>• Improve water quality and ensure the efficient use of water resources</li> </ul>
Daily domestic water use (per capita)	<ul style="list-style-type: none"> <li>• Improve water quality and ensure the efficient use of water resources</li> </ul>
Planning permission granted against the advice of the Environment Agency	<ul style="list-style-type: none"> <li>• Reduce the risk of flooding</li> </ul>
Number of properties at risk from flooding	<ul style="list-style-type: none"> <li>• Reduce the risk of flooding</li> </ul>

Indicator	Relevant Objective
Condition of SSSIs / Achievement of PSA target	<ul style="list-style-type: none"> <li>• To conserve and enhance biodiversity</li> <li>• Protect the ecological integrity of Natura 2000 sites</li> </ul>
Achievement of BAP targets and actions	<ul style="list-style-type: none"> <li>• To conserve and enhance biodiversity</li> </ul>
Number and condition of Listed Buildings	<ul style="list-style-type: none"> <li>• Conserve and enhance the historic built and natural environment</li> </ul>
Area and condition of open spaces	<ul style="list-style-type: none"> <li>• Maintain and enhance the quality of green belt and open space areas</li> </ul>
Development on previously developed land (PDL)	<ul style="list-style-type: none"> <li>• Make the best use of previously developed land (PDL) and existing buildings</li> </ul>
Kg waste collected per head	<ul style="list-style-type: none"> <li>• Reduce production of waste and increase recycling</li> </ul>
Percentage of waste recycled or composted	<ul style="list-style-type: none"> <li>• Reduce production of waste and increase recycling</li> </ul>

## Appendix 2 – Compatibility Matrix for Strategic Objectives and Sustainability Objectives

### Strategic Objectives

SO1 - Capitalise on redevelopment opportunities to secure physical, economic and environmental regeneration of the borough and ensure the delivery of key benefits for the wider community.

SO2 - Ensure a continuous supply of land and homes to meet a range of housing needs including affordable housing, family housing and accommodation needs of specific groups within the community, whilst offering a range of housing choices which are of high quality in the right places.

SO3 - Facilitate sustainable economic growth by safeguarding and enhancing an appropriate range of sites and premises to meet the demands of local businesses and growth sectors in order to attract and retain high quality services, industries and well paid jobs in the Borough while ensuring residents are able to access them.

SO4 - Ensure the timely delivery of appropriate social infrastructure, to strengthen the community, and reduce existing deprivation in the Borough.

SO5 - Ensure high environmental standards of development and sustainable resource management and efficiency to support the long term sustainability of our environment and respond to climate change in a practical and effective way.

SO6 - Protect and enhance green infrastructure in order to achieve a range of interlinked benefits. Improve the quality and distribution of green infrastructure and enhance biodiversity where possible.

SO7 - Ensure that waste is managed in the most environmentally friendly way in order to protect human health and the environment by producing less waste, re-using waste and recycling it and thereby contribute to an efficient use of resources.

SO8 - Ensure Waltham Forest is a safe, vibrant and healthy place to live and work by enhancing connectivity across the borough, facilitating regeneration and growth in a sustainable manner, minimising congestion and pollution, and providing a range of attractive travel options to access to jobs, opportunities and facilities within the borough and beyond.

SO9 - Provide a quality of education and vocational training that ensures that the young people of the Borough can capitalise on the opportunities in Waltham Forest and London, and are able to succeed and prosper now and in the future.

SO10 - Reduce inequalities, unemployment and worklessness in the Borough by improving skills, training and employment opportunities and access to jobs.

SO11 - Increase the attraction of the area as a tourist destination, based on its unique assets, and the opportunities offered as one of the host boroughs of the 2012 Olympic Games.

SO12 - Conserve and enhance the borough's built heritage assets whilst maximising their contribution to future economic growth and community well-being.

SO13 - Improve the health and well-being of Waltham Forest residents by positively influencing the wider and spatial determinants of health, such as physical activity, pollution and food choices.

SO14 - Safeguard and strengthen the function of Walthamstow Town Centre, the District and Neighbourhood Centres capitalising on their respective roles for shopping, culture, leisure, tourism, housing and employment etc, and ensuring they continue to develop as vibrant, attractive, distinctive, safe and welcoming places.

SO15 - Create positive and inclusive environments (buildings and spaces) of high quality that contribute to the distinctiveness of Waltham Forest's neighbourhoods.

SO16 - Ensure that Waltham Forest is a safer, more accessible and inclusive place where people want to live, work and visit and where anti-social behaviour, crime and the fear of crime no longer reduces the quality of people's lives.

### **SA Objectives**

1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings
2. Reduce crime and the fear of crime
3. Improve standard of health and wellbeing of those who live and work in the Borough
4. Increase the provision of and access to community facilities to meet local cultural, recreational and social needs
5. Improve educational attainment in schools
6. Improve opportunities for access to education and training for all residents
7. Reduce the overall level of deprivation
8. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system

### **ENVIRONMENTAL**

9. Reduce production of waste and increase recycling
10. Reduce greenhouse gas emissions
11. Conserve energy
12. Improve air quality through a reduction in traffic-based emissions
13. Improve water quality and ensure the efficient use of water resources
14. Reduce the risk of flooding
15. Reduce contamination and safeguard soil quality and quantity
16. Make the best use of previously developed land (PDL) and existing buildings
17. Conserve and enhance biodiversity
18. Protect the ecological integrity of Natura 2000 sites
19. Maintain and enhance the quality of the green belt and open space areas.
20. Conserve and enhance the historic built and natural environment

### **ECONOMIC**

21. Maintain and enhance the vitality and viability of the Borough's town centres
22. Improve the local economy by attracting inward investment
23. Maintain stable levels of employment in the Borough

Key:

✓	Generally compatible	×	Generally incompatible	~	No relationship	?	Compatibility depends upon implementation
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	SO1	SO2	SO3	SO4	SO5	SO6	SO7	SO8	SO9	SO10	SO11	SO12	SO13	SO14	SO15	SO16
SA1	✓	✓	-	-	-	-	-	-	-	-	-	-	-	✓	✓	-
SA2	✓	-	-	✓	-	-	-	✓	✓	✓	×	-	-	-	✓	✓
SA3	✓	✓	-	✓	✓	✓	-	✓	✓	✓	-	-	✓	-	✓	✓
SA4	✓	-	-	✓	-	✓	-	-	-	-	-	-	-	✓	-	✓
SA5	-	-	-	✓	-	-	-	-	✓	✓	-	-	-	-	-	-
SA6	-	-	-	✓	-	-	-	-	✓	✓	-	-	-	-	-	-
SA7	✓	✓	✓	✓	-	-	-	✓	✓	✓	-	-	✓	-	-	-
SA8	-	-	-	-	-	-	-	✓	-	✓	-	-	-	-	-	✓
SA9	-	-	-	-	✓	-	✓	-	-	-	-	-	-	-	-	-
SA10	-	-	-	-	✓	-	-	✓	-	-	-	-	-	-	-	-
SA11	-	-	-	-	✓	-	-	-	-	-	-	-	-	-	-	-
SA12	✓	-	-	-	-	-	-	✓	-	-	-	-	✓	-	-	-
SA13	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	-
SA14	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
SA15	✓	-	-	-	✓	✓	-	✓	-	-	-	-	-	-	-	-
SA16	✓	-	-	-	-	-	-	✓	-	-	-	-	-	-	-	-
SA17	✓	-	-	-	-	✓	-	-	-	-	✓	-	-	-	✓	-
SA18	-	-	-	-	-	✓	-	-	-	-	×	-	-	-	-	-
SA19	✓	-	-	-	-	✓	-	-	-	-	-	-	-	-	✓	-
SA20	?	-	-	-	?	✓	-	-	-	-	✓	✓	-	-	-	-
SA21	✓	-	-	-	-	-	-	✓	-	-	✓	-	-	✓	✓	✓
SA22	✓	-	✓	-	-	-	-	-	-	-	✓	-	-	✓	✓	✓
SA23	✓	-	✓	-	-	-	-	-	✓	✓	✓	-	-	✓	-	-

### Summary

The Core Strategy Objectives and Sustainability Appraisal Objectives are generally compatible, where there is a discernible relationship between them. An analysis of their compatibility indicates that there are two instances where there is a potential conflict; both instances involve Core Strategy Strategic Objective 11: Increase the attraction of the area as a tourist destination, based on its unique assets, and the opportunities offered as one of the host boroughs of the 2012 Olympic Games.

The first incompatibility is with SA Objective 2: Reduce crime and the fear of crime. It is considered that there is the potential for conflict as increased tourism can be associated with increased levels of certain types of crime e.g. robbery/theft. Therefore increasing the attraction of the area as a tourist destination has the potential to increase the levels of some types of crime.

The second incompatibility is with SA Objective 18: Protect the ecological integrity of Natura 2000 sites. Increasing the attraction of the area as a tourist destination based on its unique assets, with one such asset being the Natura 2000 sites within the borough, has the potential to increase the exposure of the Natura 2000 to recreational pressure and the damage/ degradation which can result from such pressure. It is therefore considered that increasing the attraction of the area as a tourist destination could have detrimental effects on the ecological integrity of Natura 2000 sites within the borough as a result of the potential for more people to visit the sites.

There are two instances where the compatibility of Objectives is dependent upon their implementation; both instances involve Sustainability Appraisal Objective 20: Conserve and enhance the historic built and natural environment.

The first instance relates to Strategic Objective 1: Capitalise on redevelopment opportunities to secure physical, economic and environmental regeneration of the borough and ensure the delivery of key benefits for the wider community. Although SO1 references environmental regeneration it is unclear whether redevelopment opportunities to secure regeneration will offer opportunities to conserve and enhance the historic built environment. It will be very much dependent upon the location and details individual sites as to whether redevelopment can offer such benefits to the historic environment and the weight afforded to potential conflicts between economic regeneration and the local historic environment.

The second instance relates to Strategic Objective 5: Ensure high environmental standards of development and sustainable resource management and efficiency to support the long term sustainability of our environment and respond to climate change in a practical and effective way. Again, the implementation of this Objective will be very much dependent upon individual sites and locations and the weight afforded to the historic environment. The practicalities of adapting to climate change could potentially conflict with conserving and enhancing the historic environment and therefore individual sites will need to be considered on their own merits.

The analysis of the compatibility of the Objectives indicated that the rest of the Objectives are compatible, where a relationship exists. However, it is evident that there are some Objectives for which few relationships with other Objectives are apparent. This is due to the nature of the objectives and the fact that they are very specific in what they aim to achieve.

## Appendix 3 – Baseline Data

### A.1 Population

A.1.1 In 2001 Waltham Forest had a high proportion of younger, potentially economically active, residents. The population of Waltham Forest is relatively young with over a third under 25 years, which is just over the UK average and around 35% are aged 25-44 which is a lot higher than the UK average<sup>24</sup>.

**Table A1.1: London Borough of Waltham Forest population (number of people) (2001)<sup>25</sup>**

Age Range	Population	Age Range	Population
0-4	15,541	25-29	21,040
5-7	8,622	30-44	56,163
8-9	5,981	45-59	33,395
10-14	14,017	60-64	8,404
15	2,707	65-74	13,094
16-17	5,460	75-84	8,855
18-19	5,191	85-89	2,376
20-24	16,294	90+	1,201

A.1.2 Waltham Forest has a high population density when compared with the average for London, as presented in Table A1.2.

**Table A1.2: Population density (2001)<sup>26</sup>**

	Waltham Forest	London	England
<b>Total population</b>	218,341	7,172,091	49,138,831
<b>Area (hectares)</b>	3,881	157,205	13,027,872
<b>Number of persons per hectare</b>	56.25	45.62	3.77

A.1.3 Waltham Forest has a diverse mix of ethnic groups with an above average proportion of Black and Asian residents when compared with the rest of London. Waltham Forest is the tenth most ethnically diverse of the 33 London Boroughs<sup>27</sup> and around 44% of residents are from a minority ethnic background<sup>28</sup>. The percentage of school children who are from a minority ethnic background in much higher at 65% which suggests that over time the population of the

<sup>24</sup> Waltham Forest Council (no date) Community Strategy 2012 <http://www.walthamforest.gov.uk/community-strategy-2012-colour.pdf>

<sup>25</sup> Office of National Statistics Census 2001

<sup>26</sup> Neighbourhood Statistics 2001

<sup>27</sup> Waltham Forest Council (no date) Community Strategy 2012 <http://www.walthamforest.gov.uk/community-strategy-2012-colour.pdf>

<sup>28</sup> Office of National Statistics 2001 Census, reported in Waltham Forest Council (no date) Community Strategy 2012 <http://www.walthamforest.gov.uk/community-strategy-2012-colour.pdf>

Borough will become more ethnically mixed<sup>29</sup>. If current trends in the Borough continue the percentage of the population from minority ethnic backgrounds will potentially be 55%<sup>30</sup>.

**Table A1.3: Ethnicity (percentage) (2005)<sup>31</sup>**

	Waltham Forest	London	England
<b>White</b>	63.1	69.6	89.1
<b>Mixed</b>	3.9	3.4	1.6
<b>Asian or Asian British</b>	14.9	12.9	5.3
<b>Black or Black British</b>	15.6	10.8	2.7
<b>Chinese or Other Ethnic Group</b>	2.4	3.3	1.3

A.1.4 The population of Waltham Forest is predicted to increase by 13.2% in the period 2006 to 2026. This is less than the predicted percentage increase in population in London generally and for the wider Outer London area. Overall for London the population is predicted to increase by 20.8% in the same period. For Outer London the predicted increase is 18.5%.

**Table A1.4: Population projections (thousands of people and percentages)<sup>32</sup>**

Projections					Population increase 2006 - 2026					
Waltham Forest					Waltham Forest		Outer London		London	
2006	2011	2016	2021	2026	No.	%	No.	%	No.	%
91	94	97	100	103	12	13.2	343	18.5	660	20.8

## A.2 Human Health

A.2.1 Life expectancy for Waltham Forest is slightly lower than the metropolitan and national average.

<sup>29</sup> Statistics of Education – Schools in England 2004, reported in Waltham Forest Council (no date) Community Strategy 2012 <http://www.walthamforest.gov.uk/community-strategy-2012-colour.pdf>

<sup>30</sup> Waltham Forest Council (no date) Community Strategy 2012 <http://www.walthamforest.gov.uk/community-strategy-2012-colour.pdf>

<sup>31</sup> Office of National Statistics, Neighbourhood Statistics, Resident Population Estimates by Ethnic Group, June 2005

<sup>32</sup> CLG revised 2004 based projections, reported in Data Management and Analysis Group Demography Update March 2008 <http://www.london.gov.uk/gla/publications/factsandfigures/dmag-update-2008-02a.pdf>

**Table A2.1: Life expectancy<sup>33</sup> (years)**

		2001/03	2004/06	2006/08
<b>Waltham Forest</b>	<b>Male</b>	74.6	75.3	76.5
	<b>Female</b>	79.5	80.7	81.1
<b>London</b>	<b>Male</b>	76.0	77.4	78.2
	<b>Female</b>	80.8	82.0	82.7
<b>England</b>	<b>Male</b>	76.2	77.3	77.9
	<b>Female</b>	80.7	81.5	82.0

A.2.2 The proportion of people in Waltham Forest who regarded their health as 'not good' is slightly lower than the national average but higher than the average for London. This pattern is reflected in the proportion of people who regard their health as 'good' and those who suffer with a limiting long-term illness.

**Table A2.2: Percentage of people who describe their health as good/fairly good/not good (number of people and percentage) (2001)<sup>34</sup>**

	Waltham Forest	London	England
<b>Good</b>	149,773 (68.6%)	5,078,978 (70.82%)	33,787,361 (68.6%)
<b>Fairly Good</b>	48,986 (22.4%)	1,499,198 (20.9%)	10,915,594 (22.2%)
<b>Not Good</b>	19,582 (9%)	593,915 (8.3%)	4,435,876 (9.2%)
<b>Limiting Long term illness</b>	36,110 (16.5%)	1,111,284 (15.5%)	8,809,194 (17.9%)

A.2.3 Death rates from circulatory disease have been steadily declining over time; however, rates in Waltham Forest are somewhat higher than those for London and the rest of England and Wales, as illustrated below in Table A2.3. Mortality rates from cancer have also been declining, but at a slower rate, and the figure for Waltham Forest is again higher than that for London and the rest of the country.

**Table A2.3: Mortality rates from circulatory disease and cancer (per 100,000 population)<sup>35</sup>**

	Cause of Death	1994	1996	1998	2000	2002	2004	2006
<b>Waltham Forest</b>	<b>Circulatory disease</b>	167.01	158.77	147.67	133.47	136.22	114.41	101.3
	<b>Cancer</b>	94.64	82.84	74.13	83.74	74.82	63.39	69.05
<b>London</b>	<b>Circulatory disease</b>	150.27	142.78	130.23	119.25	108.41	95.86	82.61
	<b>Cancer</b>	84.94	82.48	78.97	71.73	70.30	65.32	64.61

<sup>33</sup> Office of National Statistics, Neighbourhood Statistics

<sup>34</sup> Census 2001

<sup>35</sup> Gateways to health, Waltham Forest Public Health Report 2007/08

	Cause of Death	1994	1996	1998	2000	2002	2004	2006
England & Wales	Circulatory disease	151.98	143.29	130.26	114.85	103.63	90.25	79.58
	Cancer	84.19	81.06	77.23	73.33	71.22	67.30	65.78

- A.2.4 Tuberculosis (TB) is an issue in Waltham Forest and the rate of TB has continued to increase over time, remaining higher than the rate for London. This is in stark contrast to the rate for England, which has remained fairly static. The majority of cases are concentrated in the southern part of the Borough where there are high levels of overcrowded housing and deprivation. Black Africans and Indian, Pakistani and Bangladeshi ethnic groups show the highest rates of TB and the majority of cases are diagnosed among people who were born outside the UK but who have been living in the UK for a number of years. The most likely explanation for this includes a failure to detect the infection during the first year of arrival, reactivation of latent TB or new infection due to overcrowded housing and poverty<sup>36</sup>.
- A.2.5 The number of HIV infections has continued to increase in Waltham Forest with heterosexual sex being the predominant route of transmission<sup>37</sup>.
- A.2.6 Teenage conception rates are higher than the rate for London and England but have been slowly declining over the past 10 years in line with the rest of the country<sup>38</sup>. There has been a 9.8% reduction in under-18 conceptions since 1998. Of the conceptions in the age group 15 – 17, 66% resulted in abortions in 2008, which is a rise of 7% since 2005<sup>39</sup>.
- A.2.7 Infant mortality rates (deaths under 1 year) have continued to fall but have remained higher than the rate for London and England and Wales. However, figures for 2004-2006 show an increasing divergence from the London rate and Waltham Forest now ranks 5<sup>th</sup> worst London Borough for infant mortality<sup>40</sup>.

## A.3 Economy

- A.3.1 The proportion of VAT registrations in Waltham Forest in 2007 was slightly higher than de-registrations, which suggests that the economy is growing slowly, as shown in Table A3.1.

**Table A3.1: VAT registrations and deregistrations in 2007<sup>41</sup>**

	Waltham Forest	London	England
<b>Registrations</b>	14.5%	12.8%	10.2%
<b>De-registrations</b>	10.4%	8.6%	7.3%

- A.3.2 An examination of vacancy rates in the Borough for commercial and industrial properties reveals that the proportion of vacant property has decreased in the past few years. This is contrary to the general trend for both London and England and suggests that vacant premises

<sup>36</sup> Gateways to health, Waltham Forest Public Health Report 2007/08

<sup>37</sup> Gateways to health, Waltham Forest Public Health Report 2007/08

<sup>38</sup> Gateways to health, Waltham Forest Public Health Report 2007/08

<sup>39</sup> 2009/10 Annual Public Health Report, Waltham Forest

<sup>40</sup> Gateways to health, Waltham Forest Public Health Report 2007/08

<sup>41</sup> www.nomisweb.co.uk

are either being brought back into industrial or commercial use or are being redeveloped for alternative uses.

**Table A3.2: Percentage of vacant commercial and industrial premises<sup>42</sup>**

	Waltham Forest	London	England
% of vacant commercial and industrial premises 1998/1999	18	10	7
% of vacant commercial and industrial premises 2002/2003	14	9	8
% of vacant commercial and industrial premises 2004/2005	14	11	9
% change from 1998/99 – 2004/05	-4	+1	+2

- A.3.3 The majority of firms in the Borough are very small with those employing less than 5 people making up 77% of the total stock of businesses, although these firms account for only 16% of all people employed. At the other end of the scale, the largest private sector employers account for a similar proportion with 13% of all jobs in the Borough. On average, each workplace in the Borough accounts for just 9 employees – a figure which falls to 6 amongst private sector enterprises. Furthermore, it is the smaller firms in the Borough that have increased in number over the period from 1998 to 2006<sup>43</sup>.
- A.3.4 Sectors that are growing strongly in the London economy are under-represented in the Waltham Forest. For example, financial and business services which are a powerful growth driver in London represent a relatively small proportion of the economy – just 17% compared with 33% London-wide. Conversely, the Borough has more businesses that are located in the sectors that are expected to decline, such as manufacturing and construction. Although small and medium sized businesses form a particularly high proportion of activity in the Borough, entrepreneurship is comparatively weak with self-employment representing 13% of the Borough's employed population compared with the North London average of 18%<sup>44</sup>.
- A.3.5 Many of the Borough's industrial and commercial areas are old and were not developed to the operational and environmental standards required by most companies. The Borough's businesses are relatively small and require considerable flexibility in the size, design and cost of accommodation, not least as they expand and requirements change. There is particular under-provision of offices. Substantial improvement in this supply will be required if the business services sector is to grow, especially in the town centres and around transport hubs<sup>45</sup>.

## A.4 Employment and Skills

- A.4.1 The average pay in Waltham Forest, by both workplace and residence, is lower than for the rest of London but higher than the national average. The wages of those living in Waltham Forest is higher than those who work there with residence-based income almost 10% higher than workplace based income. This suggests that residents commute out of the area to access better paid work.

<sup>42</sup> Office for National Statistics

<sup>43</sup> Waltham Forest's enterprise and employment strategy, January 2008

<sup>44</sup> Waltham Forest's enterprise and employment strategy, January 2008

<sup>45</sup> Waltham Forest's enterprise and employment strategy, January 2008

**Table A4.1: Average weekly earnings (£)<sup>46</sup>**

	Resident Population			Workplace Population		
	Waltham Forest	London	England	Waltham Forest	London	England
<b>2009</b>	542	599	491	532	627	490
<b>2008</b>	529	581	480	512	613	479
<b>2007</b>	514	553	459	469	581	459
<b>2006</b>	498	538	446	422	569	445
<b>2005</b>	489	527	433	451	556	432
<b>2004</b>	475	510	421	439	537	420
<b>2003</b>	477	496	406	445	521	405
<b>2002</b>	455	480	393	400	501	392

A.4.2 Economic activity rates in Waltham Forest are slightly lower than those in the rest of London and Great Britain. Levels of employment are in line with the rest of London, but somewhat lower than the rest of the country, with unemployment being at a higher level than the rest of London and the country as a whole.

**Table A4.2: Economic activity rates April 2009-March 2010 (percentages)<sup>47</sup>**

Economic status	Waltham Forest	London	Great Britain
<b>All economically active</b>	71.1	74.9	76.5
<b>All economically active in employment</b>	63.9	68	70.3
<b>Unemployment</b>	11.6	9.1	7.9

A.4.3 A greater proportion of the workforce is employed in associate professional and technical jobs, sales and customer services, process plant and machine operators and elementary occupations than nationally. A smaller proportion of people are employed within managers and senior officials roles, professional occupations, administrative and secretarial roles and personal service occupations when compared with the rest of England.

**Table A4.3: Employment by Occupation April 2009-March 2010 (percentages of all people in employment)<sup>48</sup>**

Occupations	Waltham Forest	London	England
<b>Managers and senior officials</b>	12.1	17.4	15.7

<sup>46</sup> www.nomisweb.co.uk

<sup>47</sup> www.nomisweb.co.uk

<sup>48</sup> www.nomisweb.co.uk

Occupations	Waltham Forest	London	England
<b>Professional occupations</b>	12.1	18.2	13.7
<b>Associate professional and technical</b>	17.8	19.0	14.7
<b>Administrative and Secretarial</b>	9.7	11.0	11.2
<b>Skilled trade occupations</b>	10.3	7.3	10.4
<b>Personal service occupations</b>	6.4	7.1	8.7
<b>Sales and customer services</b>	8.3	6.1	7.4
<b>Process plant and machine operators</b>	8.5	4.5	6.6
<b>Elementary occupations</b>	13.0	8.7	11.1

A.4.4 The proportion of residents of Waltham Forest who hold Level 4/5 qualifications is somewhat lower than the average for London and the rest of the country. The proportion of residents with other qualifications is twice that for the rest of the country and the proportion of those with no qualifications is much higher than the London and national average.

**Table A4.4: Qualifications Jan 2009-December 2009 (percentages)<sup>49</sup>**

	Waltham Forest	London	Great Britain
<b>Level 1 and above</b>	60.2	74.0	78.9
<b>Level 2 and above</b>	48.1	64.5	65.4
<b>Level 3 and above</b>	38.8	53.2	49.3
<b>Level 4/5</b>	26.2	39.7	29.9
<b>No qualifications</b>	21.5	11.8	12.3
<b>Other qualifications</b>	18.3	14.3	8.8

**No qualifications:** No formal qualifications held

**Other qualifications:** includes foreign qualifications and some professional qualifications

**NVQ 1 equivalent:** e.g. fewer than 5 GCSEs at grades A-C, foundation GNVQ, NVQ 1, intermediate 1 national qualification (Scotland) or equivalent

**NVQ 2 equivalent:** e.g. 5 or more GCSEs at grades A-C, intermediate GNVQ, NVQ 2, intermediate 2 national qualification (Scotland) or equivalent

**NVQ 3 equivalent:** e.g. 2 or more A levels, advanced GNVQ, NVQ 3, 2 or more higher or advanced higher national qualifications (Scotland) or equivalent

**NVQ 4 equivalent and above:** e.g. HND, Degree and Higher Degree level qualifications or equivalent

<sup>49</sup> [www.nomisweb.co.uk](http://www.nomisweb.co.uk)

## A.5 Transport

A.5.1 The local transport network broadly reflects the geography of the borough, with the principal road and rail links generally running from north-east to south-west towards Central London.

### Public transport

A.5.2 The public transport network consists principally of two railway services, two underground services and a large network of bus and night bus services. The Chingford to Liverpool Street Line is a radial rail line that forms a main commuter route to Central London. The Barking to Gospel Oak Line (GOBLIN) is an outer London orbital rail route that has recently been taken over by TfL as part of the London Overground network. The London Underground Central Line serves the south of the borough whilst the Victoria Line runs to Walthamstow Central and serves the middle of the borough.

**Figure A5.1: Stations within Waltham Forest**

Central Line	Victoria Line	Chingford Line	GOBLIN line
<ul style="list-style-type: none"> <li>• Leyton</li> <li>• Leytonstone</li> </ul>	<ul style="list-style-type: none"> <li>• Blackhorse Road</li> <li>• Walthamstow Central</li> </ul>	<ul style="list-style-type: none"> <li>• St James Street</li> <li>• Walthamstow Central</li> <li>• Wood Street</li> <li>• Highams Park</li> <li>• Chingford</li> </ul>	<ul style="list-style-type: none"> <li>• Blackhorse Road</li> <li>• Walthamstow Queens Road</li> <li>• Leyton Midland Road</li> <li>• Leytonstone High Road</li> </ul>

A.5.3 The Lea Valley Line provides a connection from Stansted Airport to Stratford via Tottenham Hale and the closed station at Lea Bridge in Leyton. There is currently a limited service from Stratford to both Hertford East and Stansted Airport. The Council wishes to see the reinstatement of the Hall Farm Curve, which would allow the creation of a new link between Chingford and Stratford. This initiative is particularly important to Waltham Forest as it would provide a connection from the five overground stations in the Borough, and the disused one at Lea Bridge, to the main development sites at Stratford, including Stratford and the Olympics.

A.5.4 The Borough is well served by buses, with the network centred on the recently modernised Walthamstow Bus Station which is now the third busiest bus station in London. In total there are 37 bus routes serving the borough, including six night bus routes. The Council is working with TfL London Buses on the possible extension of several routes and new initiatives, including third generation bus priority.

### Road network

A.5.5 The road network in the borough is made up of two Transport for London Road Network (TLRN) Roads (the A406 North Circular Road and the A12 Hackney to M11 Link Road, which are constructed to grade separated standard), Strategic Roads (including the A104 Lea Bridge Road and the A112) and a large number of Distributor and Local Roads. In terms of car parking, there are currently 13 Controlled Parking Zones within the Borough covering areas that would otherwise experience acute parking stress.

A.5.6 There has been a substantial growth in traffic since 1975 but a shift of traffic away from local roads onto the TLRN Roads. Traffic on local roads has remained relatively stable in recent years although the increase in traffic on the TLRN has meant that overall traffic levels have increased.

### Car ownership

A.5.7 Levels of car ownership in the borough lie somewhere between those of neighbouring boroughs, with 61% of all households having access to a car in 2001. This is below the average car ownership level for outer London boroughs of 71%.

**Table A5.2: Cars or vans by household (number and percentage of households)<sup>50</sup>**

	Waltham Forest	London	England
<b>Total households</b>	89,788	3,015,997	20,451,427
<b>No car or van</b>	34,975 (39%)	1,130,649 (37.5%)	5,488,386 (26.8%)
<b>1 car or van</b>	39,562 (44%)	1,298,481 (43%)	8,935,718 (43.7%)
<b>2 cars or vans</b>	12,512 (14%)	476,185 (15.8%)	4,818,581 (23.6%)
<b>3 cars or vans</b>	2,177 (2.4%)	86,470 (2.9%)	924,289 (4.5%)
<b>4 or more cars or vans</b>	562 (0.6%)	24,212 (0.8%)	284,453 (1.4%)
<b>Total cars or vans</b>	73,529	2,616,328	22,607,629
<b>Average (cars/vans per household)</b>	0.82	0.87	1.1

### Walking and cycling

A.5.8 Pedestrians and cyclists are top of the Council's hierarchy of road users, with the Council considering walking and cycling to be excellent modes of transport for trips of up to 2km and 5km respectively and for linking up other modes of transport. The Council is currently preparing a Walking Strategy for the Borough with the aim of identifying measures to increase the level and number of people walking. Street lighting and traffic calming measures are also implemented as required which benefit pedestrians and other road users.

A.5.9 Provision for cyclists within the Borough is good with on road cycle lanes covering 32km of main roads and 32km of quiet cycle routes on residential roads and through parkland and forest. Secure cycle parking is provided at three underground stations within the Borough, namely Walthamstow Central, Leytonstone and Leyton, and at other key locations such as leisure centres. Cycle training is also offered free to all adults living, working or studying in the Borough. In addition, cycle parking facilities are required as part of all new developments.

<sup>50</sup> Neighbourhood Statistics

## Journey to work

A.5.10 In terms of journey to work, the 2001 Census shows that the two main modes for residents living in the Borough are driving a car / van (20.2%) and using the Underground (16.9%), followed by rail (5.9%) and bus (5.8%). The proportion of people who walk or cycle to work is lower than both the London and national average.

**Table A5.3: Travel to work by mode 2001 (resident population)<sup>51</sup>**

Mode of transport	Waltham Forest	London	England
<b>All People</b>	159,041	5,300,332	35,532,091
<b>At home</b>	6,735 (4.2%)	285,935 (5.4%)	2,055,224 (5.8%)
<b>Underground, metro, light rail or tram</b>	26,849 (16.9%)	625,224 (11.8%)	709,386 (2.0%)
<b>Train</b>	9,326 (5.9%)	404,414 (7.6%)	950,023 (2.7%)
<b>Bus, minibus or coach</b>	9,300 (5.8%)	369,108 (7.0%)	1,685,361 (4.7%)
<b>Taxi or minicab</b>	786 (0.5%)	21,608 (0.4%)	116,503 (0.3%)
<b>Driving a car or van</b>	32,126 (20.2%)	1,111,762 (21.0%)	12,324,166 (34.7%)
<b>Passenger in car or van</b>	2,553 (1.6%)	83,378 (1.6%)	1,370,685 (3.9%)
<b>Motorcycle, scooter or moped</b>	1,155 (0.7%)	47,147 (0.9%)	249,456 (0.7%)
<b>Bicycle</b>	1,708 (1.1%)	77,330 (1.5%)	634,588 (1.8%)
<b>On foot</b>	6,915 (4.3%)	279,340 (5.3%)	2,241,901 (6.3%)
<b>Other</b>	324 (0.2%)	13,888 (0.3%)	104,205 (0.3%)
<b>Not currently working</b>	61,264 (38.5%)	1,981,198 (37.4%)	13,090,593 (36.8%)

## Distance travelled to work

A.5.11 Over 50% of journeys are between 5km and 19km, with the average distance being 10.15km, reflecting the high number of people commuting into Central London for work in the morning peak. The proportion of residents who travel less than 5km to work is higher than the London average, whilst the proportion that travel over 10km is less than the average for London and England.

<sup>51</sup> Neighbourhood Statistics

**Table A5.4: Distance travelled to work 2001 (workplace population and percentages)<sup>52</sup>**

Distances	Waltham Forest	London	England
<b>Total</b>	60,647	3,805,655	22,376,120
<b>At home</b>	12,287 (20.3%)	460,616 (12.1%)	3,046,762 (13.6%)
<b>&lt;2km</b>	13,139 (21.7%)	475,822 (12.5%)	4,483,669 (20.0%)
<b>2-&lt;5km</b>	12,912 (21.3%)	664,704 (17.5%)	4,510,167 (20.2%)
<b>5-&lt;10km</b>	10,317 (17.0%)	817,167 (21.5%)	4,093,941 (18.3%)
<b>10-&lt;20km</b>	6,425 (10.6%)	731,737 (19.2%)	3,416,826 (15.3%)
<b>20-&lt;30km</b>	2,302 (3.8%)	215,639 (5.7%)	1,199,166 (5.4%)
<b>30-&lt;40km</b>	1,058 (1.7%)	114,525 (3.0%)	530,080 (2.4%)
<b>40-&lt;60km</b>	1,192 (2.0%)	152,330 (4.0%)	490,505 (2.2%)
<b>60km +</b>	1,015 (1.7%)	173,115 (4.6%)	605,004 (2.7%)

## A.6 Crime and Safety

A.6.1 *Safe and Sustainable, The Partnership Plan for Waltham Forest 2008/2011* reports the following:

- During the lifetime of the previous three-year strategy to March 2008, priority crime in Waltham Forest fell by approximately 16%. It is predicted to continue to fall and at a rate greater than its most similar Crime and Disorder Reduction Partnership groups.
- In 2007/08 Waltham Forest performed significantly better in reducing crime than the London and East London averages.
- In 2003/04 there were 301 drug users in treatment; in the first 11 months of 2007/08 this had increased to 869.
- Fewer young people are entering the youth justice system (23% fewer in 2007/08 than 2006/07).
- In 2005 more than half of all local residents surveyed thought that Anti-Social Behaviour (ASB) was a problem where they lived, and only 26% of people felt safe outside in their local neighbourhood at night. In a repeat survey in 2007, the proportion of people expressing concerns about ASB had fallen to 29% and the proportion of people reporting that they felt safe outside in their local neighbourhood at night rose to 57%.

A.6.2 Crime levels are generally higher in Waltham Forest than nationally.

<sup>52</sup> Neighbourhood Statistics

**Table A6.1: Level of Crime 2009/10<sup>53</sup>**

Number of Offences	12 months to August 10 (year)		12 months to August 09 (year)	
	Waltham Forest	Met Total	Waltham Forest	Met Total
Total Crimes	27,393	827,132	26,927	841,202
Homicide	5	126	5	123
Violence Against the Person (Total)	5,774	174,454	5,700	173,874
Rape	100	3,120	76	2,270
Other Sexual	215	7,192	186	6,608
Robbery (Total)	1,770	34,001	1,516	32,910
Robbery (Person)	1,641	30,858	1,346	29,604
Robbery (Business)	129	3,143	170	3,306
Burglary (Total)	3,215	89,579	3,412	95,817
Burglary Residential	2,217	58,614	2,327	60,972
Burglary Non-Residential	998	30,965	1,085	34,845
Gun Crime	162	3,274	142	3,239
Motor Vehicle Crime	4,013	98,222	4,351	104,479
Domestic Crime	1,893	50,922	1,790	53,098
Racist & Religious Hate Crime	250	9,532	301	9,854
Homophobic Crime	33	1,309	26	1,240

## A.7 Housing

A.7.1 Within Waltham Forest there are a large proportion of small households and this is in line with London and the rest of the country. In general, the size of households in Waltham Forest reflects the pattern for the rest of the country.

**Table A7.1: Household size (number of households and percentages) (2001)<sup>54</sup>**

Household Sizes	Waltham Forest	London	England
<b>All occupied household spaces</b>	89,788	3,015,997	20,451,427
<b>1 person</b>	29,727 (33.1%)	1,046,888 (34.7%)	6,150,264 (30.0%)
<b>2 person</b>	26,187 (29.2%)	885,233 (29.3%)	6,985,981 (34.2%)
<b>3 person</b>	14,239 (15.9%)	453,878 (15.0%)	3,161,192 (15.5%)
<b>4 person</b>	11,201 (12.5%)	378,497 (12.5%)	2,732,975 (13.4%)

<sup>53</sup> <http://www.met.police.uk/crimefigures/datatable.php?borough=jc&period=year>

<sup>54</sup> Census 2001

Household Sizes	Waltham Forest	London	England
<b>5 person</b>	5,598 (6.2%)	166,947 (5.5%)	1,008,873 (4.9%)
<b>6 person</b>	1,727 (1.9%)	60,401 (2.0%)	297,933 (4.5%)
<b>7 person</b>	651 (0.7%)	13,786 (0.5%)	69,731 (0.3%)
<b>8+ person</b>	458 (0.5%)	10,367 (0.3%)	44,478 (0.2%)

A.7.2 According to census data from 2001 Waltham Forest has a greater proportion of households that are composed of lone parents than London and the rest of the country and a slightly lower proportion of households comprising married or cohabiting couples. The proportion of one-person households is slightly higher than the national average whereas the proportion of households comprised of all pensioners is lower than the national average.

A.7.3 Table A7.2 illustrates that almost 10% of households contain 'concealed households' – households in which non-dependent (grown-up) children live when they could form a separate, independent household of their own but are unable to do so due, in the most part, to financial constraints.

**Table A7.2: Household composition (number of households and percentages) (2001)<sup>55</sup>**

Household Types	Waltham Forest	London	England
<b>Total households</b>	89,788	3,015,997	20,451,427
<b>One person</b>	18,676 (20.8%)	664,802 (22.0%)	3,210,799 (15.7%)
<b>One person: Pensioner</b>	11,051 (12.3%)	382,086 (12.7%)	2,939,465 (14.4%)
<b>All pensioners</b>	4,513 (5.0%)	161,931 (5.4%)	1,826,453 (8.9%)
<b>Married couple</b>	7,323 (8.2%)	255,565 (8.5%)	2,656,440 (13%)
<b>Married couple with dependent children</b>	13,698 (15.3%)	457,991 (15.2%)	3,591,335 (17.6%)
<b>Married couple with non dependent children</b>	4,601 (5.1%)	146,306 (4.8%)	1,218,191 (6.0%)
<b>Cohabiting couple</b>	4,687 (5.2%)	160,592 (5.3%)	976,879 (4.8%)
<b>Cohabiting couple with dependents</b>	2,623 (2.9%)	75,552 (2.5%)	661,073 (3.2%)
<b>Cohabiting couple with non-dependent children</b>	269 (0.3%)	8,151 (0.3%)	66,352 (0.3%)
<b>Lone parents with dependent children</b>	8,518 (9.5%)	229,306 (7.6%)	1,311,974 (6.4%)
<b>Lone parents with non-dependent children</b>	3,491 (3.9%)	106,658 (3.5%)	622,904 (3.0%)
<b>Other households</b>	10,338 (11.5%)	367,057 (12.2%)	1,369,562 (6.7%)

<sup>55</sup> Census 2001

A.7.4 In Waltham Forest a high proportion of the dwelling stock is terraced. The proportion of detached dwellings and flats/maisonettes/apartments is low in comparison to the proportion for both London and England.

**Table A7.3: Dwelling stock (numbers of dwellings and percentages) (2001)<sup>56</sup>**

House Types	Waltham Forest	London	England
<b>Total household spaces (with residents)</b>	89,788	3,015,997	20,451,427
<b>Detached</b>	3,156 (3.4%)	187,764 (6.0%)	4,786,456 (22.5%)
<b>Semi-detached</b>	15,036 (16.3%)	594,849 (19.1%)	6,713,183 (31.5%)
<b>Terraced</b>	38,394 (41.5%)	806,309 (25.9%)	5,494,033 (25.8%)
<b>Flat/maisonette/apartment</b>	22,861 (24.7%)	1,027,386 (33.0%)	8,205,408 (38.5%)
<b>Mobile/Temporary</b>	82 (0.1%)	3,361 (0.1%)	88,918 (0.4%)
<b>Shared dwelling</b>	11,287 (12.2%)	433,361 (14.0%)	77,531 (0.4%)

A.7.5 The Waltham Forest Housing Needs Survey 2007 indicated that in the third quarter of 2007 the average price/rent of a property in Waltham Forest was £258,010 or £1,232 pcm and the mean average gross household income excluding benefits was £25,967 per annum<sup>57</sup>. This means that the average house price to salary ratio is around 10% i.e. in order to afford the average house one would need to borrow ten times the average salary. As can be seen in Table A7.4 below, the average house price in January 2008 was £271,517, which equates to a cost/income ratio of 10 times salary. Given the current economic climate and the recent downturn in the housing market, this ratio could be decreasing.

**Table A7.4: Average house prices by type (January 2008)<sup>58</sup>**

House Types	Date	Waltham Forest	London	England
<b>Detached</b>	January 2008	£422,017	£627,073	£280,441
	January 2007	£385,847	£557,973	£266,415
<b>Semi-detached</b>	January 2008	£348,555	£364,698	£173,659
	January 2007	£318,682	£324,510	£164,952
<b>Terraced</b>	January 2008	£275,025	£325,159	£145,907
	January 2007	£251,454	£289,328	£136,745
<b>Flat</b>	January 2008	£206,579	£319,116	£175,279
	January 2007	£188,874	£283,951	£163,236
<b>Overall</b>	January 2008	£271,517	£355,599	£185,615
	January 2007	£248,246	£316,414	£174,740

<sup>56</sup> Census 2001

<sup>57</sup> Waltham Forest Housing Needs Survey 2007

<sup>58</sup> Land Registry

A.7.6 A greater proportion of homes are private or social rented compared with the rest of the country, as illustrated in Table A7.5. The proportion of owner/occupied dwellings is in line with the rest of England, however, the proportion of properties that are owned outright is lower than the national average.

**Table A7.5: Housing tenure (Number of dwellings and Percentages) (2001)<sup>59</sup>**

Housing Tenure	Waltham Forest	London	England
<b>Total households</b>	89,788	3,015,997	20,451,427
<b>Owned outright</b>	18,834 (21%)	665,061 (22.0%)	5,969,670 (29.2%)
<b>Owned with mortgage/ loan</b>	33,297 (37.1%)	1,010,629 (33.5%)	7,950,759 (38.9%)
<b>Shared ownership</b>	787 (0.9%)	29,029 (1.0%)	133,693 (0.6%)
<b>Social rented</b>	21,393 (23.8%)	790,371 (26.2%)	3,940,728 (19.3%)
<b>Private rented</b>	14,086 (15.7%)	467,083 (15.5%)	2,037,470 (10.0%)
<b>Living rent free</b>	1,391 (1.5%)	53,824 (1.8%)	419,107 (2.0%)

A.7.7 The number of households on the Housing Register has increased since 2001/02. However, the current trend is that the figure has been decreasing slowly, which is contrary to the trend for London as a whole. It should be noted that the number of households on the Housing Register does not necessarily equate to the number of households in housing need as there are no restrictions regarding who can apply to be included on the Housing Register.

**Table A7.6: Households on the Housing Register (number of households)<sup>60</sup>**

Year	Waltham Forest	London
<b>2001/02</b>	8,664	211,469
<b>2002/03</b>	10,283	226,789
<b>2003/04</b>	9,680	242,389
<b>2004/05</b>	9,016	279,729

A.7.8 In 2008/09, 302 units of affordable housing were provided from new build/conversion/change of use. There were 294 units acquired from the market through housing associations for affordable housing, making a total of 596 affordable housing units. This significantly exceeded the target of 332 units<sup>61</sup>.

## A.8 Cultural Heritage

A.8.1 In Waltham Forest there are 107 Statutory Listed Buildings (11 x Grade 2\*, 96 x Grade 2), of which seven are on the English Heritage Buildings at Risk Register. The Council have produced a 'local list' of buildings, which do not have the same statutory protection, but which

<sup>59</sup> Census 2001

<sup>60</sup> Parliamentary Records 11<sup>th</sup> July 2005 [www.parliament.the-stationery-office.co.uk](http://www.parliament.the-stationery-office.co.uk)

<sup>61</sup> London Borough of Waltham Forest Annual Monitoring Report 2008/09

the Council will seek to conserve and enhance as much as possible; there are 145 Locally Listed Buildings.

A.8.2 The following areas have been designated as Conservation Areas<sup>62</sup>:

- The Green, Chingford
- Ropers Avenue/Inks Green, Highams Park
- Woodford Green
- Leucha Road, Walthamstow
- Walthamstow St. James
- St Mary's Church (Walthamstow Village)
- Forest School
- Orford Road/Eden Road/ Grosvenor Park Road, Walthamstow
- Whipps Cross Road/Forest Glade, Leytonstone
- Browning Road, Leytonstone
- Thornhill Road, Leyton

A.8.3 In addition to the designated Conservation Areas there is one designated Area of Special Character:

- The Higham's Estate, Chingford

A.8.4 The Greater London Archaeological Advisory Service has defined a number of Archaeological Priority Zones (APZs) that are of particular archaeological interest<sup>63</sup>. The APZs within the Borough include:

- The Lea Valley;
- The valleys of the Ching and the Fillebrook Rivers;
- Areas around the Saxon and Mediaeval settlements of Chingford, Walthamstow, Leyton, Highams Park and Leytonstone.

## A.9 Climate

A.9.1 Emissions of carbon dioxide have shown a very small decrease between 2005 and 2008. Although emissions in the industrial and commercial sector have increased overall, those in the domestic and road transport sectors have fallen, despite an increase in population.

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<sup>62</sup> London Borough of Waltham Forest, Urban Conservation web pages – [www.walthamforest.gov.uk](http://www.walthamforest.gov.uk)

<sup>63</sup> London Borough of Waltham Forest Unitary Development Plan First Review 2006

**Table A9.1 Carbon dioxide emissions by sector 2005-2008 (kt CO<sub>2</sub>)** <sup>64</sup>

Year	Industry and Commercial	Domestic	Road Transport	Land Use, Land Use Change & Forestry	Total	Population ('000s, mid-year estimate)	Per Capita Emissions (t)
2005	287	493	208	2	990	218.7	4.5
2006	307	491	200	2	1,000	219.2	4.6
2007	277	479	200	2	958	219.8	4.4
2008	306	485	187	2	980	221.4	4.4

NB Figures for emissions from industry and commercial does not include ETS installations or diesel railways. Figures for emissions from road transport do not include emissions from motorways.

A.9.2 In the report 'Rising to the Challenge'<sup>65</sup> the likely effects of climate change on the South East are discussed. The following climatic changes have been predicted by 2080 based on the medium to high scenarios:

- Mean annual temperature +1.2 to + 3.4°C
- Mean annual rainfall +1 to +4%
- Winter rainfall +6 to +22%
- Summer rainfall -8 to -23%
- Summer cloud cover -3 to -4%
- Mean annual wind speed 0 to + 0.09 m/s
- Relative humidity remains fairly constant
- Overall increase in temperature and rainfall variability
- Mean sea level in the English Channel +54 cm
- Likely occurrence of a wet winter (160% of normal winter rainfall) 11% as compared to 1.7% with the present climate
- Likely occurrence of a dry summer (50% of normal summer rainfall) 10% compared to 1% with the present climate

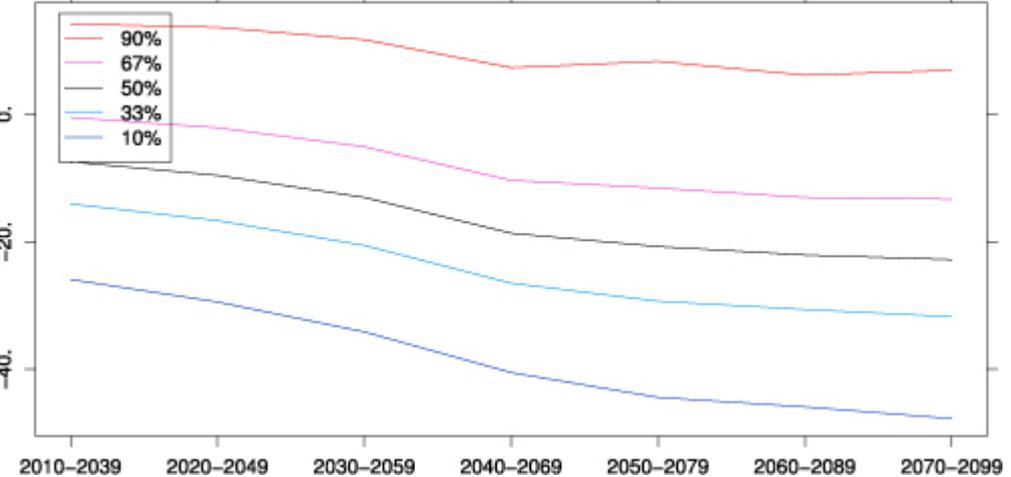
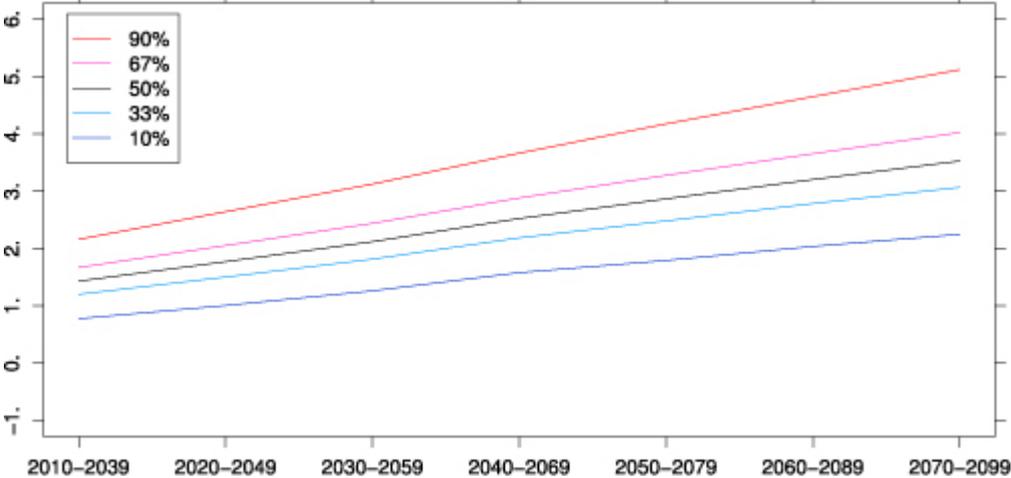
A.9.3 Since the publication of 'Rising to the Challenge', there have been further climate change predictions for the regions. The predictions for London under the medium emissions scenario are illustrated below<sup>66</sup>:

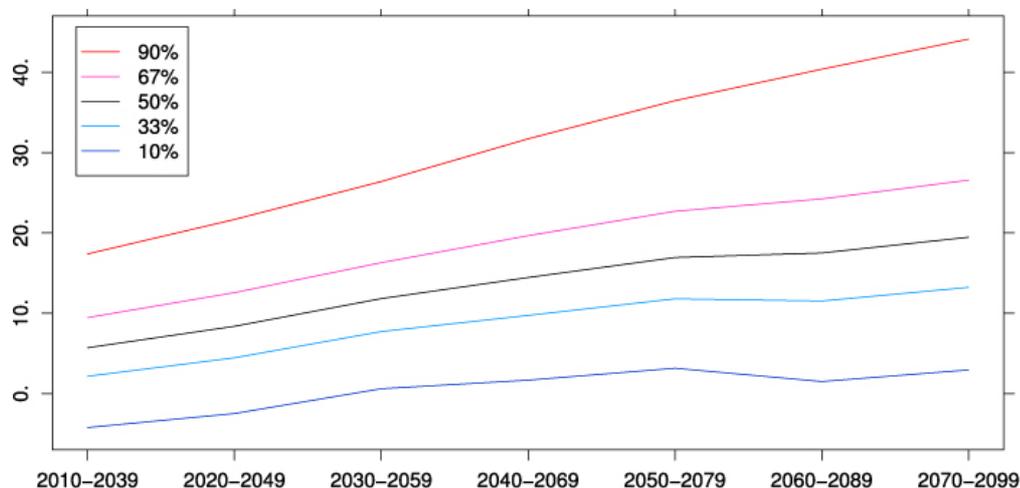
NB: These graphs, or [plume plots](#), show the range of values over time for three climate change [variables](#). Each graph shows information for the 10, 33, 50, 67 & 90% [probability levels](#) for all [time periods](#), and are available for all three [emissions scenarios](#).

<sup>64</sup> [http://www.decc.gov.uk/assets/decc/Statistics/climate\\_change/localAuthorityCO2/457-local-regional-co2-2005-2008-full-data.xls](http://www.decc.gov.uk/assets/decc/Statistics/climate_change/localAuthorityCO2/457-local-regional-co2-2005-2008-full-data.xls)

<sup>65</sup> Rising to the Challenge (1999) South East Climate Change Partnership  
[http://www.climatesoutheast.org.uk/publications\\_reports.php?back=publications.php](http://www.climatesoutheast.org.uk/publications_reports.php?back=publications.php)

<sup>66</sup> <http://ukclimateprojections.defra.gov.uk/content/view/591/499/>





## A.10 Air

- A.10.1 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>. Although background locations achieved the target concentrations for NO<sub>2</sub> in 2005 the annual average objective of 40µg/m<sup>3</sup> at roadside locations has yet to be achieved<sup>67</sup>.
- A.10.2 The majority of London Borough of Waltham Forest falls within the Transport for London Low Emission Zone (LEZ), which came into force on 4<sup>th</sup> 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> – heavy vehicles with diesel engines. The scheme initially focuses on HGVs of 12 tonnes with lighter HGVs, buses and coaches, large vans and minibuses to be included as a phased approach<sup>68</sup>. The vehicles affected at the outset are lorries, buses and coaches but it will be extended in October 2010 to include heavier vans and minibuses. The scheme does not apply to cars, motorcycles and small vans (under 1.205 tonnes unladen weight)<sup>69</sup>.

## A.11 Soil

- A.11.1 The percentage of new dwellings within Waltham Forest that are built on Previously Developed Land (PDL) is significantly above the national target, as outlined in PPS3: Housing, to achieve 60% of new residential development on previously developed land. Between 2004 and 2009 the proportion of new residential development on PDL was 100%<sup>70</sup>.
- A.11.2 The number of land pollution incidents in Waltham Forest has fluctuated between 2004 and 2008. All the reported incidents were category 3, and as such led to minimal environmental damage. The lowest number of incidents occurred in 2005, when only six were recorded, whereas 2008 saw the greatest number of category 3 incidents with a total of 13.

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<sup>67</sup> Air Quality Progress Report 2007, LBWF

<sup>68</sup> London Borough of Waltham Forest, Air Quality Officer

<sup>69</sup> Transport for London - [www.tfl.gov.uk/roadusers/lez/default.aspx](http://www.tfl.gov.uk/roadusers/lez/default.aspx)

<sup>70</sup> LBWF Annual Monitoring Report 2008/09

A.11.3 The primary cause for all category 3 incidents between 2004 and 2008 was unauthorised activities such as fly-tipping and unauthorised waste management. There were no major or significant incidents (categories 1 and 2) reported during this time<sup>71</sup>.

## A.12 Water

A.12.1 Some parts of Waltham Forest are subject to flood risk from the River Lea, particularly in the southern part of the Borough.

A.12.2 In Waltham Forest, there are just over 10,800 properties (10% of all properties) at risk of fluvial flooding<sup>72</sup>, the majority of which are residential. For those at risk, over half (55%) are classified as having a significant likelihood of flooding and only 5% have a low likelihood of flooding. The remainder are at moderate likelihood<sup>73</sup>

A.12.3 The Council has adopted an approach that no planning permission will be granted contrary to the advice of the Environment Agency in relation to flood defence or water quality and that any differences will be negotiated until an agreement is reached. In 2006/07, of the planning applications on which the Environment Agency commented, 64% were approved and 36% were refused. Accordingly no planning permissions were granted contrary to the advice of the EA<sup>74</sup>.

A.12.4 River water quality monitoring data reveals very high levels of nutrients in the rivers in Waltham Forest. It also indicates that chemical and biological quality is poor; however the majority of samples are compliant with the river quality targets set<sup>75</sup>.

**Table A12.1: River water quality<sup>76</sup>**

**Key:**

A – Very Good	D – Fair	1 – Very Low	4 – Moderate
B – Good	E – Poor	2 – Low	5 – High
C – Fairly Good	F – Bad	3 – Moderately Low	6 – Very High

Monitoring Point	Chemical	Biological	Nitrate	Phosphate
<b>River Lea</b>				
<b>Kings Weir - Tottenham Lock</b>	2008 - A		2008 - 5	2008 - 5
	2004/06 – B	2008 - B	2004/06 – 5	2004/06 – 5
	2002/04 – B	2004 – C	2002/04 – 5	2002/04 – 6
	2000/02 – B		2000/02 – 5	2000/02 – 6
<b>Lea Bridge Weir - Carpenters Road</b>	2008 - D	2008 - D	2008 - 6	2008 - 6
	2004/06 – D	2005 – D	2004/06 – 6	2004/06 – 6
	2002/04 – D	2002 – E	2002/04 – 6	2002/04 – 6
	2000/02 - D	2000 – E	2000/02 – 5	2000/02 – 6
<b>Springhill - Lea</b>	2008 - E	2008 - D	2008 - 6	2008 - 6

<sup>71</sup>[http://www.environment-agency.gov.uk/static/documents/Research/WALTHAM\\_FOREST\\_432KB.pdf](http://www.environment-agency.gov.uk/static/documents/Research/WALTHAM_FOREST_432KB.pdf)

<sup>72</sup> Figures are indicative only and are taken from the 2008 National Flood Risk Assessment (NaFRA) – Environment Agency

<sup>73</sup> [http://www.environment-agency.gov.uk/static/documents/Research/WALTHAM\\_FOREST\\_432KB.pdf](http://www.environment-agency.gov.uk/static/documents/Research/WALTHAM_FOREST_432KB.pdf)

<sup>74</sup> LBWF Annual Monitoring Report 2007/08

<sup>75</sup> Environment Agency – What’s in your Backyard? (Walthamstow) - [www.environment-agency.gov.uk/wiyby](http://www.environment-agency.gov.uk/wiyby)

<sup>76</sup> Environment Agency – What’s in your Backyard? (Walthamstow) – [www.environment-agency.gov.uk/wiyby](http://www.environment-agency.gov.uk/wiyby)

Monitoring Point	Chemical	Biological	Nitrate	Phosphate
<b>Bridge Weir</b>	2004/06 – E	2005 – D	2004/06 – 6	2004/06 – 6
	2002/04 – E	2002 – E	2002/04 – 6	2002/04 – 6
	2000/02 – E	2000 – E	2000/02 – 5	2000/02 – 6
<b>Tottenham Lock - Springhill</b>	2008 - E	2008 - D	2008 - 6	2008 - 6
	2004/06 – E	2005 – D	2004/06 – 6	2004/06 – 6
	2002/04 – E	2002 – E	2002/04 – 6	2002/04 – 6
	2000/02 – E	2000 – D	2000/02 – 5	2000/02 – 6
<b>River Lea (Navigation 'B')</b>				
<b>Kings Weir - Tottenham Lock</b>	2008 - D	2008 - C	2008 - 3	2008 - 5
	2004/06 – D	2004 – B	2004/06 – 4	2004/06 – 5
	2002/04 – D	2000 – A	2002/04 – 4	2002/04 – 5
	2000/02 – C		2000/02 – 4	2000/02 – 5
<b>Salmon Brook</b>				
<b>Deephams STW – Pymmes Brook</b>	2008 - D	2008 - F	2008 - 6	2008 - 6
	2004/06 – E	2004 – D	2004/06 – 6	2004/06 – 6
	2002/04 – E	2000 – E	2002/04 – 6	2002/04 – 6
	2000/02 – E		2000/02 – 6	2000/02 – 6
<b>Houndsden Gutter – Deephams STW</b>	2008 - E	2008 - C	2008 - 4	2008 - 5
	2004/06 – E	2006 – C	2004/06 – 4	2004/06 – 5
	2002/04 – E	2003 – D	2002/04 – 4	2002/04 – 5
	2000/02 – D	2000 – C	2000/02 – 4	2000/02 – 5

## Water Pollution

- A.12.5 There were no category 1 (major impact) incidents recorded in Waltham Forest between 2004 and 2008. However, a significant (category 2) incident was recorded in 2004, 2005 and 2008, and three were recorded in 2006. The pollutants ranged from untreated sewage to commercial waste.
- A.12.6 The number of minor (category 3) incidents has fluctuated over the last 5 years. The lowest number occurred in 2006 when six incidents were recorded. The following year saw a peak of 19 incidents, with the number falling to 17 in 2008. The main cause, in the cases where the cause was identified, was untreated sewage due to containment and control failures such as sewer/drainage failures. Other common causes included fire and unauthorised activity<sup>77</sup>.

## Water Resources

- A.12.7 Thames Water supplies water to the London Borough of Waltham Forest and falls within the London Water Resource Zone (WRZ). This WRZ is highly water stressed:
- The 5 year average (2003/04 to 2007/08) per capita consumption (PCC) in the London WRZ is 158.4 litres per person per day.
  - The 5 year mean for England and Wales is 148 litres per person per day and for the GLA it is 160.9 litres per person per day.

<sup>77</sup> [http://www.environment-agency.gov.uk/static/documents/Research/WALTHAM\\_FOREST\\_432KB.pdf](http://www.environment-agency.gov.uk/static/documents/Research/WALTHAM_FOREST_432KB.pdf)

- The Government has set a target for households to achieve 130 litres per person per day so work needs to be done on making changes to consumption patterns to protect water resources in order to meet this target.

A.12.8 There are 7 active abstraction licences in Waltham Forest which are predominantly from groundwater sources. The majority of these licences (71%) are within the Industrial, Commercial and Public Services sector. Other abstractions are for Public Water Supply (29%). Due to stresses on water availability it is unlikely that licences for large water abstractions (>1-2Ml/d) will be granted unless the applicant can demonstrate that the resources are available. However the South East of the borough of Waltham Forest is covered by the East London Policy which stipulates that new licences are restricted to 182,500 m<sup>3</sup>/yr and time limited to 2013. This is subject to review.

A.12.9 The Catchment Abstraction Management Strategy (CAMS) assessment of the Lower Lee shows that there is only adequate water available to meet environmental needs for 12% of the time. The largest single use of abstracted water from Lower Lee is for public water supply. Measures adopted to improve water efficiency within residential and commercial properties will contribute towards reducing demand for public water supply abstraction. Where this happens there is the opportunity to retain more water within the River Lee thereby seeking to improve the water available to the environment<sup>78</sup>.

## A.13 Biodiversity

A.13.1 Waltham Forest contains two sites of International Importance for Nature Conservation:

- Lea Valley – designated Special Protection Area (SPA) and Ramsar
- Epping Forest – designated Special Area for Conservation (SAC)

A.13.2 There are also four Sites of Special Scientific Interest within the Borough and their condition in 2010 is outlined in Table A13.1 below.

**Table A13.1: Condition of SSSIs in August 2010<sup>79</sup>**

PSA target is for 95% of SSSIs to be in 'favourable' or 'unfavourable but recovering' condition by 2010

Waltham Forest	South East	England
<b>Chingford Reservoirs</b>	Favourable: 47.7%	Favourable: 43%
Favourable: 0%	Unfavourable/recovering: 46.5%	Unfavourable/recovering: 50.9%
Unfavourable/recovering: 100%	Unfavourable/no change: 2.2%	Unfavourable/no change: 4.1%
Unfavourable/no change: 0%	Unfavourable declining: 13.5%	Unfavourable declining: 2%
Unfavourable declining: 0%	Destroyed/part destroyed: 0.1%	Destroyed/part destroyed: 0%
Destroyed/part destroyed: 0%	<b>Area meeting PSA target: 94.2%</b>	<b>Area meeting PSA target: 93.9%</b>
<b>Area meeting PSA target: 100%</b>		

<sup>78</sup> [http://www.environment-agency.gov.uk/static/documents/Research/WALTHAM\\_FOREST\\_432KB.pdf](http://www.environment-agency.gov.uk/static/documents/Research/WALTHAM_FOREST_432KB.pdf)

<sup>79</sup> Natural England

Waltham Forest	South East	England
<p><b>Epping Forest (part)<sup>‡</sup></b>            Favourable: 35.4%            Unfavourable/recovering: 48.2%            Unfavourable/no change: 14.5%            Unfavourable declining: 1.8%            Destroyed/part destroyed: 0%  <b>Area meeting PSA target: 83.7%</b></p>		
<p><b>Walthamstow Marshes</b>            Favourable: 7.6%            Unfavourable/recovering: 0%            Unfavourable/no change: 0%            Unfavourable declining: 92.4%            Destroyed/part destroyed: 0%  <b>Area meeting PSA target: 7.6%</b></p>		
<p><b>Walthamstow Reservoirs*</b>            Favourable: 0%            Unfavourable/recovering: 100%            Unfavourable/no change: 0%            Unfavourable declining: 0%            Destroyed/part destroyed: 0%  <b>Area meeting PSA target: 100%</b></p>		

<sup>‡</sup> Constituent SSSI of Epping Forest SAC

\* Constituent SSSI of Lea Valley SPA

A.13.3 The Borough also contains several local Sites of Importance for Nature Conservation, which have been designated at the local level and do not receive statutory protection<sup>80</sup>:

- Ainslie Wood
- Banbury Reservoir
- Ching Brook in Central Walthamstow
- Chingford Mount Cemetery
- Dagenham Brook
- Green Lanes
- Greenway Avenue Wood
- Larks Wood
- Lloyd Park
- Low Hall Farm
- Low Hall Wood
- Mansfield Park

<sup>80</sup> [www.wildweb.london.gov.uk](http://www.wildweb.london.gov.uk)

- Pimp Hall Nature Reserve
  - Sewardstone Road Rough
  - St Mary The Virgin Churchyard, Leyton
  - St Mary's Churchyard, Walthamstow Village
  - St Patrick's Cemetery
  - The Copse
  - Tottenham Marshes East
- A.13.4 Important habitats in Waltham Forest, as identified in the Waltham Forest Biodiversity Action Plan, include:
- Acid Grasslands Habitat
  - Churchyard and Cemeteries
  - Floodplain Grassland, Marsh and Reed Bed Habitat
  - Gardens and Allotments Habitat
  - Grasslands, Meadows and Pastures Habitat
  - Hedgerows and Green Lanes Habitat
  - Woodland and Urban Forest Habitat
  - Wood Pasture Habitat
  - Rivers and Streams Habitat
  - Parks, Open Spaces and Brownfield Sites Habitat
  - Open Water Biodiversity

## A.14 Landscape and Townscape

- A.14.1 Waltham Forest is an urban area which contains areas of Metropolitan Green Belt and Metropolitan Open Land. In addition to these areas there are a large number of other open spaces in the Borough such as parks, playing fields and allotments. There are also many smaller pockets of open land such as gardens and churchyards which fulfil an important function as amenity open space<sup>81</sup>. These areas of open space make an important contribution to the landscape and townscape of the Borough.
- A.14.2 Waltham Forest comprises approximately 780 acres of parks and green spaces. Much of this is managed by the Borough and represents a major opportunity for residents to come into contact with the natural world and enjoy wildlife<sup>82</sup>.
- A.14.3 The Borough contains two parks that have been awarded the green flag status in recognition of their high standards:

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<sup>81</sup> London Borough of Waltham Forest Unitary Development Plan First Review 2006

<sup>82</sup> London Borough of Waltham Forest Biodiversity Action Plan – Habitat Action Plan for parks, open spaces and brownfield sites

- Coronation Gardens - created in 1901 and 1902 and named to celebrate the coronation of Edward VII. The formal gardens opened in 1903 and were fully restored in 2003 as part of the gardens' centenary celebrations.
  - Langthorne Park - a new park which opened on 17 June 2003 on the site of Stratford-Langthorne Abbey.
- A.14.4 There are also six premier parks within the Borough and a number of local parks with a range of facilities, including children's play areas, skate parks, a cycle race track, tree trails, ecology areas, attractive landscaping or interesting features, such as a model railway for children.
- A.14.5 The open spaces within the Borough offer varied types and sizes of facilities, from the smallest ornamental gardens, to informal landscaped areas, cemeteries and churchyards, extensive woodlands and nature conservation areas.
- A.14.6 There are more than 50 sports pitches for hire including cricket, football, tennis, basketball and many green spaces have designated cycle paths that link up with quiet back street routes allowing the avoidance of busy roads.
- A.14.7 In terms of the built environment Waltham Forest comprises several 'Conservation Areas'. These areas have been identified as making an important contribution to the Borough townscape for their local distinctiveness and historic character. In relation to new development in the built environment the Council raises awareness of, and rewards, good quality design through annual Design Awards.

## A.15 Waste

- A.15.1 The total municipal waste (MSW) arisings for the North London Waste Authority (NLWA) in 2008/09 are 912,463 tonnes, a reduction of 32,125 tonnes since 2007/08 (944,588 tones). The NLWA was within the top 10 authorities for improvements in the percentage of MSW sent to landfill in 2006/07, with an improvement of 10%.
- A.15.2 There has been an overall improvement in the amount of waste sent to landfill from the NLWA, from 46% in 2005/06 to 29% in 2008/09. Over the same period the amount of MSW disposed of through incineration has increased from 35% to 49%.
- A.15.3 Incineration is now the primary disposal method for MSW in the North London Waste Authority. The amount of MSW recycled or composted has improved from 18% in 2005/06 to 22% in 2008/09.
- A.15.4 The NLWA is currently meeting its 2009/10 target of 358,996 tonnes for the landfill directive. Under the Landfill Allowance Trading Scheme (LATS) each waste disposal authority is given an allocation for the amount of biodegradable municipal waste (BMW) that they can landfill each year in order to reduce the amount landfilled to meet the requirements of the Landfill Directive. The amount of BMW going to landfill in the NLWA has declined from 298,373 tonnes (or 95.3% of the allocation) in 2005/06, to 178,880 tonnes in 2008/09.

### Recycling

- A.15.5 In September 2007, London Borough of Waltham Forest introduced a Compulsory Recycling scheme across the Borough. The majority of households are included in the scheme with the exception of flats above shops or in blocks. The 'Get Sorted! Door-to-Door Recycling Service'

collects paper, cardboard, glass bottles and jars, food and drink cans, plastic bottles, textiles, shoes, batteries and engine oil for recycling<sup>83</sup>.

- A.15.6 The household recycling and composting rate in Waltham Forest ranks 17th out of the 33 boroughs. This is a drop from 2007/08 when it ranked 10th.
- A.15.7 The overall household recycling and composting rate in Waltham Forest has improved steadily since 2000/01, from 6.8% to 29.74% in 2007/08, but dropped slightly in 2008/09 to 27.84%. The overall rate is lower than the London total rate of 29.2% and higher than the NLWA rate of 26.76% in 2008/09.
- A.15.8 Waltham Forest has signed up to the Local Area Agreement indicator N192 – percentage of household waste that is reused, recycled or composted – as one of its top 35 indicators. This aims to see the local authority maximise waste recycling in order to achieve the Governments targets for waste management. The targets set for Waltham Forest, for this indicator, are 34% in 2008/09, 38% in 2009/10 and 42% in 2010/11.
- A.15.9 The recycling and composting rate in Waltham Forest met the statutory recycling target in 2005/06 and 2007/08 but marginally missed the target of 12% in 2003/04 achieving 11.7%. In 2007/08 the rate achieved was 9.74% above the target, highlighting a huge improvement in recycling levels. The NI192 target in 2008/09 was not met. The rate of 27.84% was 6.16% short of the target 34%<sup>84</sup>.
- A.15.10 A green waste recycling service for kitchen and garden waste is available to all street properties in Waltham Forest. After collection, the green garden and kitchen waste is transported to an 'in-vessel' composting facility in Edmonton and the material is processed in an enclosed container under controlled conditions to make compost, which is used in Waltham Forest's parks, open spaces and allotments<sup>85</sup>.

### Fly-Tipping

- A.15.11 The number of big and nasty fly-tipping incidents recorded in Waltham Forest showed an increase between 2006/07 and 2007/08, but has declined in 2008/09. Big incidents are those of tipper lorry load size or larger, and 'nasty' incidents are those involving oil, fuel or chemical drums. The number of big incidents has fluctuated over the last few years, but shown the most significant decline in 2008/09. The number of nasty incidents increased by almost double in recent years, but declined marginally in 2008/09.
- A.15.12 Waltham Forest has signed up to the local area agreement indicator N196 – improved street and environment cleanliness (fly tipping). This aims to achieve a year on year reduction in the number of fly tipping incidents<sup>86</sup>.

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<sup>83</sup> LBWF Rubbish, waste and recycling web pages – [www.walthamforest.gov.uk](http://www.walthamforest.gov.uk)

<sup>84</sup> [http://www.environment-agency.gov.uk/static/documents/Research/WALTHAM\\_FOREST\\_432KB.pdf](http://www.environment-agency.gov.uk/static/documents/Research/WALTHAM_FOREST_432KB.pdf)

<sup>85</sup> LBWF Rubbish, waste and recycling web pages – [www.walthamforest.gov.uk](http://www.walthamforest.gov.uk)

<sup>86</sup> [http://www.environment-agency.gov.uk/static/documents/Research/WALTHAM\\_FOREST\\_432KB.pdf](http://www.environment-agency.gov.uk/static/documents/Research/WALTHAM_FOREST_432KB.pdf)

## Appendix 4 – Appraisal Matrices

CS1 – Distribution of Growth			
SA Objective	Short Term	Medium Term	Long Term
1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	+	+	++
2. Reduce crime and the fear of crime	-	-	-
3. Improve standard of health and wellbeing of those who live and work in the Borough	+	+	+
4. Increase the provision of and access to community facilities to meet local cultural, recreational and social needs	+	+	+
5. Improve educational attainment in schools	-	-	-
6. Improve opportunities for access to education and training for all residents	+	+	+
7. Reduce the overall level of deprivation	+	+	+
8. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system	+	+	+
9. Reduce production of waste and increase recycling	-	-	-
10. Reduce greenhouse gas emissions	-	-	-
11. Conserve energy	-	-	-
12. Improve air quality through a reduction in traffic-based emissions	-	-	-
13. Improve water quality and ensure the efficient use of water resources	-	-	-
14. Reduce the risk of flooding	-	-	-
15. Reduce contamination and safeguard soil quality and quantity	-	-	-
16. Make the best use of previously developed land (PDL) and existing buildings	+	+	+
17. Conserve and enhance biodiversity	-	-	-
18. Protect the ecological integrity of Natura 2000 sites	+/?	+/?	+/?
19. Maintain and enhance the quality of the green belt and open space areas.	+	+	+

<b>CS1 – Distribution of Growth</b>			
SA Objective	Short Term	Medium Term	Long Term
20. Conserve and enhance the historic built and natural environment	-	-	-
21. Maintain and enhance the vitality and viability of the Borough's town centres	+	+	+
22. Improve the local economy by attracting inward investment	+	+	+
23. Maintain stable levels of employment in the Borough	+	+	+
<p><b>Summary</b></p> <p>This is a new policy since the Preferred Options consultation. This policy will, over the plan period and as the required and planned-for housing allocation is delivered, offer a significant benefit with regard to meeting housing need and delivering the required size and tenure of dwelling (SA Objective 1)</p> <p>Essential infrastructure including schools and health facilities will be delivered in a timely fashion, thus offering benefits in relation to relevant objectives.</p> <p>Growth will be accommodated on previously developed land, which will offer benefits in relation to SA Objective 16.</p> <p>Regeneration development that would significant adversely affect international designations of the Lea Valley water bodies will not be permitted. Development in these areas will be required to incorporate measures necessary to avoid adverse effects on the SPA/Ramsar through proximity of development. This will offer benefits in relation to protecting the ecological integrity of Natura 2000 sites.</p> <p>The policy seeks to focus additional growth in main town centre uses in the designated town centres, positively benefiting the vitality and viability of the town centres and the local economy through attracting new businesses and retail chains/ independents to the area. The policy seeks to safeguard land for employment use in designated employment areas, which will positively contribute to the maintenance of the borough's employment locations.</p> <p>The policy seeks to preserve the integrity of the Green Belt and Metropolitan Open Land (MOL) positively contributing to SA Objective 19 through maintaining and enhancing the quality of the green belt.</p> <p><b>Recommendations</b></p> <p>The reference to climate change in relation to accommodating growth on previously developed land does not seem relevant. As the policy stands, growth on previously developed land will be accommodated by applying policy mechanisms to tackle climate change. Reference to climate change would be better placed in the first sentence of the policy e.g. "...economic development and environmental protection while applying a range of policy mechanisms to tackle climate change locally".</p> <p>Reference to avoiding adverse effects on the SPA/Ramsar currently relates to development in regeneration areas only. It is suggested that a separate bullet point is created to ensure that all development is covered by the requirement to incorporate measures necessary to avoid adverse effects.</p>			

CS2 – Improving Housing Quality and Choice			
SA Objective	Short Term	Medium Term	Long Term
1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	+	++	++
2. Reduce crime and the fear of crime	-	-	-
3. Improve standard of health and wellbeing of those who live and work in the Borough	+	+	+
4. Increase the provision of and access to community facilities to meet local cultural, recreational and social needs	x	x	x
5. Improve educational attainment in schools	-	-	-
6. Improve opportunities for access to education and training for all residents	-	-	-
7. Reduce the overall level of deprivation	+	+	++
8. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system	-	-	-
9. Reduce production of waste and increase recycling	-	-	-
10. Reduce greenhouse gas emissions	-	-	-
11. Conserve energy	x/?	x/?	x/?
12. Improve air quality through a reduction in traffic-based emissions	-	-	-
13. Improve water quality and ensure the efficient use of water resources	+/?	+/?	+/?
14. Reduce the risk of flooding	-	-	-
15. Reduce contamination and safeguard soil quality and quantity	-	-	-
16. Make the best use of previously developed land (PDL) and existing buildings	+	+	+
17. Conserve and enhance biodiversity	-	-	-
18. Protect the ecological integrity of Natura 2000 sites	-	-	-
19. Maintain and enhance the quality of the green belt and open space areas.	-	-	-
20. Conserve and enhance the historic built and natural environment	x	x	x

<b>CS2 – Improving Housing Quality and Choice</b>			
SA Objective	Short Term	Medium Term	Long Term
21. Maintain and enhance the vitality and viability of the Borough’s town centres	+	+	+
22. Improve the local economy by attracting inward investment	-	-	-
23. Maintain stable levels of employment in the Borough	-	-	-
<p><b>Summary</b></p> <p>This policy identifies the amount of residential development to be accommodated in the Borough over the plan period and broad locations for this development. The delivery of this housing, over the plan period (long term) will significantly benefit meeting local housing need. The policy requires housing to be delivered to meet identified tenures and in particular affordable units (370 a year). The provision of these dwellings, in particular the affordable units, is envisaged to contribute towards reducing deprivation across the borough and in the particular identified locations, which as housing delivery increases is identified to be significant in the longer term. This is also associated with the planned regeneration of housing estates. These improvements can indirectly contribute to improved health of borough’s residents.</p> <p>This policy now includes reference to prioritising development on previously developed land, particularly unused or underused land.</p> <p>This policy is focused on the delivery of new residential development; the policy does not include provision of community facilities, therefore at this stage it is uncertain but envisaged to be negative with regard to SA Objective 4.</p> <p>With regard to conserving energy (SA Objective 11) and the efficient use of water resources (SA Objective 13) all development will increase the amount of water and energy used, however if measures in other Core Strategy policies are enforced then energy efficiency measures, water minimisation measures and the use of low carbon and renewable technologies will be incorporated to reduce the negative effects of new development.</p> <p>The amount of new development proposed should be located and designed to ensure that it does not negatively impact upon the historic built and natural environment.</p> <p><b>Recommendations</b></p> <p>Consider providing cross reference to CS5 - minimising and adapting to climate change, CS6 – enhancing green infrastructure and biodiversity and CS7 - promoting sustainable waste management and recycling.</p>			

CS3 – Making Efficient Use of Employment Land			
SA Objective	Short Term	Medium Term	Long Term
1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	+	+	+
2. Reduce crime and the fear of crime	-	-	-
3. Improve standard of health and wellbeing of those who live and work in the Borough	-	-	-
4. Increase the provision of and access to community facilities to meet local cultural, recreational and social needs	-	-	-
5. Improve educational attainment in schools	-	-	-
6. Improve opportunities for access to education and training for all residents	-	-	-
7. Reduce the overall level of deprivation	+	+	+
8. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system	-	-	-
9. Reduce production of waste and increase recycling	-	-	-
10. Reduce greenhouse gas emissions	-	-	-
11. Conserve energy	-	-	-
12. Improve air quality through a reduction in traffic-based emissions	-	-	-
13. Improve water quality and ensure the efficient use of water resources	-	-	-
14. Reduce the risk of flooding	-	-	-
15. Reduce contamination and safeguard soil quality and quantity	-	-	-
16. Make the best use of previously developed land (PDL) and existing buildings	+	+	+
17. Conserve and enhance biodiversity	-	-	-
18. Protect the ecological integrity of Natura 2000 sites	-	-	-
19. Maintain and enhance the quality of the green belt and open space areas.	-	-	-
20. Conserve and enhance the historic built and natural environment	-	-	-
21. Maintain and enhance the vitality and viability of the	+	+	+

<b>CS3 – Making Efficient Use of Employment Land</b>			
SA Objective	Short Term	Medium Term	Long Term
Borough's town centres			
22. Improve the local economy by attracting inward investment	+	+	++
23. Maintain stable levels of employment in the Borough	+	++	++
<p><b>Summary</b> This policy has changed considerably since the preferred options policy CS2. Overall it has been restructured and focuses now on key sustainable economic growth factors. This policy protects and resists the loss of designated employment areas. It is also seeking to intensify and upgrade existing employment land to secure more jobs for local people particularly in the identified regeneration areas. There is a focus on encouraging a mix of employment facilities and types, in particular provision for small and medium sized enterprises and creative/cultural industries. This focus should in the medium to long term when proposals for units come forward deliver significant sustainability benefits with regard to SA Objective 22 and 23.</p> <p>Office developments in Walthamstow town centre will enhance the vitality and viability of the centre (SA Objective 21), also if non-productive employment land is within the town centres this can be released for more productive uses including residential.</p> <p>Very little new employment land is proposed and the majority of new or upgraded facilities will therefore be on previously developed land.</p> <p><b>Recommendations</b> None proposed</p>			

CS4 – Providing Infrastructure			
SA Objective	Short Term	Medium Term	Long Term
1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	-	-	-
2. Reduce crime and the fear of crime	-	-	-
3. Improve standard of health and wellbeing of those who live and work in the Borough	+	+	+
4. Increase the provision of and access to community facilities to meet local cultural, recreational and social needs	+	+	+
5. Improve educational attainment in schools	-	-	-
6. Improve opportunities for access to education and training for all residents	+	+	+
7. Reduce the overall level of deprivation	+	+	+
8. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system	+	+	+
9. Reduce production of waste and increase recycling	-	-	-
10. Reduce greenhouse gas emissions	-	-	-
11. Conserve energy	-	-	-
12. Improve air quality through a reduction in traffic-based emissions	-	-	-
13. Improve water quality and ensure the efficient use of water resources	-	-	-
14. Reduce the risk of flooding	-	-	-
15. Reduce contamination and safeguard soil quality and quantity	-	-	-
16. Make the best use of previously developed land (PDL) and existing buildings	+	+	+
17. Conserve and enhance biodiversity	-	-	-
18. Protect the ecological integrity of Natura 2000 sites	-	-	-
19. Maintain and enhance the quality of the green belt and open space areas.	-	-	-
20. Conserve and enhance the historic built and natural environment	-	-	-
21. Maintain and enhance the vitality and viability of the	-	-	-

<b>CS4 – Providing Infrastructure</b>			
SA Objective	Short Term	Medium Term	Long Term
Borough's town centres			
22. Improve the local economy by attracting inward investment	-	-	-
23. Maintain stable levels of employment in the Borough	+	+	+
<p><b>Summary</b> This policy has been reworded and refined since the preferred options policy CS3 was consulted upon. The policy now focuses on the key aspects of social infrastructure. This policy delivers positive effects with regard to improvements in health and well being, delivery of social infrastructure to increase accessibility and provision of community, recreational and cultural facilities to meet local needs. The provision of these facilities should contribute to reductions in deprivation.</p> <p>New facilities should be located appropriately to cater to the communities they serve and be accessible by walking and cycling, thus contributing towards SA Objective 8.</p> <p>The policy justification includes reference to Job Brokerage Centres which require additional space in certain areas of the Borough; this service contributes to maintaining and delivering new employment opportunities across the borough.</p> <p><b>Recommendations</b> None proposed</p>			

CS5 – Minimising and Adapting to Climate Change			
SA Objective	Short Term	Medium Term	Long Term
1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	-	-	-
2. Reduce crime and the fear of crime	-	-	-
3. Improve standard of health and wellbeing of those who live and work in the Borough	-	-	-
4. Increase the provision of and access to community facilities to meet local cultural, recreational and social needs	-	-	-
5. Improve educational attainment in schools	-	-	-
6. Improve opportunities for access to education and training for all residents	-	-	-
7. Reduce the overall level of deprivation	-	-	-
8. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system	-	-	-
9. Reduce production of waste and increase recycling	-	-	-
10. Reduce greenhouse gas emissions	+	++	++
11. Conserve energy	+	++	++
12. Improve air quality through a reduction in traffic-based emissions	-	-	-
13. Improve water quality and ensure the efficient use of water resources	+	+	++
14. Reduce the risk of flooding	+	+	+
15. Reduce contamination and safeguard soil quality and quantity	-	-	-
16. Make the best use of previously developed land (PDL) and existing buildings	-	-	-
17. Conserve and enhance biodiversity	-	-	-
18. Protect the ecological integrity of Natura 2000 sites	-	-	-
19. Maintain and enhance the quality of the green belt and open space areas.	-	-	-
20. Conserve and enhance the historic built and natural environment	-	-	-
21. Maintain and enhance the vitality and viability of the	-	-	-

<b>CS5 – Minimising and Adapting to Climate Change</b>			
SA Objective	Short Term	Medium Term	Long Term
Borough's town centres			
22. Improve the local economy by attracting inward investment	-	-	-
23. Maintain stable levels of employment in the Borough	-	-	-
<p><b>Summary</b>            Since the Preferred Options, policy CS4 has been considerably revised – being separated into 4 individual policies. Proposed Submission policy CS5 (previously CS4) significantly benefits, over the medium to long term minimisation of carbon emissions and delivery of renewable energy and energy efficient developments.</p> <p>The policy now includes reference to water efficiency, adaptation and reducing identified flood risk across the borough. Over the long term this policy should contribute towards significant improvements in water efficiency.</p> <p><b>Recommendations</b>            Define 'high' environmental standards with regard to BREEAM and CSH (point B) to ensure that the mandatory standards are met (for social housing).</p>			

CS6 – Enhancing Green Infrastructure and Biodiversity			
SA Objective	Short Term	Medium Term	Long Term
1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	-	-	-
2. Reduce crime and the fear of crime	-	-	-
3. Improve standard of health and wellbeing of those who live and work in the Borough	+	+	+
4. Increase the provision of and access to community facilities to meet local cultural, recreational and social needs	+	+	+
5. Improve educational attainment in schools	-	-	-
6. Improve opportunities for access to education and training for all residents	-	-	-
7. Reduce the overall level of deprivation	-	-	-
8. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system	-	-	-
9. Reduce production of waste and increase recycling	-	-	-
10. Reduce greenhouse gas emissions	-	-	-
11. Conserve energy	-	-	-
12. Improve air quality through a reduction in traffic-based emissions	-	-	-
13. Improve water quality and ensure the efficient use of water resources	-	-	-
14. Reduce the risk of flooding	-	-	-
15. Reduce contamination and safeguard soil quality and quantity	-	-	-
16. Make the best use of previously developed land (PDL) and existing buildings	-	-	-
17. Conserve and enhance biodiversity	+	+	++
18. Protect the ecological integrity of Natura 2000 sites	+	+	+
19. Maintain and enhance the quality of the green belt and open space areas.	+	+	+
20. Conserve and enhance the historic built and natural environment	+	+	+
21. Maintain and enhance the vitality and viability of the	-	-	-

<b>CS6 – Enhancing Green Infrastructure and Biodiversity</b>			
SA Objective	Short Term	Medium Term	Long Term
Borough's town centres			
22. Improve the local economy by attracting inward investment	-	-	-
23. Maintain stable levels of employment in the Borough	-	-	-
<p><b>Summary</b> This is a new policy; previously protection of the natural environment was included within Preferred Option Policy CS4. Since the preferred options the focus of this policy has been considerably revised. This policy offers benefits with regard to protecting the Green Belt and Metropolitan Open Land (MOL); it also seeks to create and enhance open spaces which will form part of the green infrastructure network. Through the protection and enhancement mechanisms in place through the policy the natural environment will be conserved and enhanced.</p> <p>The policy seeks to ensure the adequate provision and quality of play and recreational spaces, outdoor sports facilities and parks. This contributes to both the accessibility of these community facilities and also to enabling people to use recreational spaces allowing healthy activities and lifestyle to be enjoyed/ maintained, a beneficial effect on SA Objectives 3 and 4. It also ensures the adequate provision of and efficient use of allotments, enabling residents to grow their own produce.</p> <p><b>Recommendations</b> Consider specific mention of the designated international, national, regional and local habitats and sites for biodiversity in either the policy or supporting text rather than just general references.</p>			

<b>CS7 – Promoting Sustainable Waste Management</b>			
SA Objective	Short Term	Medium Term	Long Term
1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	-	-	-
2. Reduce crime and the fear of crime	-	-	-
3. Improve standard of health and wellbeing of those who live and work in the Borough	-	-	-
4. Increase the provision of and access to community facilities to meet local cultural, recreational and social needs	-	-	-
5. Improve educational attainment in schools	-	-	-
6. Improve opportunities for access to education and training for all residents	-	-	-
7. Reduce the overall level of deprivation	-	-	-
8. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system	-	-	-
9. Reduce production of waste and increase recycling	+	++	++
10. Reduce greenhouse gas emissions	-	-	-
11. Conserve energy	-	-	-
12. Improve air quality through a reduction in traffic-based emissions	+	+	+
13. Improve water quality and ensure the efficient use of water resources	-	-	-
14. Reduce the risk of flooding	-	-	-
15. Reduce contamination and safeguard soil quality and quantity	-	-	-
16. Make the best use of previously developed land (PDL) and existing buildings	-	-	-
17. Conserve and enhance biodiversity	-	-	-
18. Protect the ecological integrity of Natura 2000 sites	-	-	-
19. Maintain and enhance the quality of the green belt and open space areas.	-	-	-
20. Conserve and enhance the historic built and natural environment	-	-	-
21. Maintain and enhance the vitality and viability of the	-	-	-

<b>CS7 – Promoting Sustainable Waste Management</b>			
SA Objective	Short Term	Medium Term	Long Term
Borough's town centres			
22. Improve the local economy by attracting inward investment	-	-	-
23. Maintain stable levels of employment in the Borough	-	-	-
<p><b>Summary</b> This is a new policy; previously sustainable waste management was included within Preferred Option Policy CS4. This policy now contains specific to treating waste as close to the source as possible.</p> <p>This policy will over the medium to long term offer significant benefits with regard to waste minimisation and the increase of waste material recycled. This policy is dependent on the implementation of the Joint North London Waste Plan which is the overarching waste DPD for this area of London.</p> <p>This policy seeks to ensure waste minimisation in the construction process and encourages the use of sustainably sourced materials. Recycling storage facilities both internal and external for new developments are also required.</p> <p>This policy now encourages the sustainable movement of waste, maximising the use of rail and water transport for movements where the waste can not be treated at source, this positively contributes to reductions in air pollution where road based HGVs are not used as frequently.</p> <p><b>Recommendations</b> None proposed</p>			

CS8 – Delivering a Sustainable Transport Network			
SA Objective	Short Term	Medium Term	Long Term
1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	-	-	-
2. Reduce crime and the fear of crime	-	-	-
3. Improve standard of health and wellbeing of those who live and work in the Borough	-	-	-
4. Increase the provision of and access to community facilities to meet local cultural, recreational and social needs	+	+	+
5. Improve educational attainment in schools	-	-	-
6. Improve opportunities for access to education and training for all residents	-	-	-
7. Reduce the overall level of deprivation	-	-	-
8. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system	+	+	++
9. Reduce production of waste and increase recycling	-	-	-
10. Reduce greenhouse gas emissions	-	-	-
11. Conserve energy	-	-	-
12. Improve air quality through a reduction in traffic-based emissions	+	+	++
13. Improve water quality and ensure the efficient use of water resources	-	-	-
14. Reduce the risk of flooding	-	-	-
15. Reduce contamination and safeguard soil quality and quantity	-	-	-
16. Make the best use of previously developed land (PDL) and existing buildings	-	-	-
17. Conserve and enhance biodiversity	-	-	-
18. Protect the ecological integrity of Natura 2000 sites	-	-	-
19. Maintain and enhance the quality of the green belt and open space areas.	-	-	-
20. Conserve and enhance the historic built and natural environment	-	-	-
21. Maintain and enhance the vitality and viability of the	-	-	-

<b>CS8 – Delivering a Sustainable Transport Network</b>			
SA Objective	Short Term	Medium Term	Long Term
Borough's town centres			
22. Improve the local economy by attracting inward investment	-	-	-
23. Maintain stable levels of employment in the Borough	-	-	-
<p><b>Summary</b> This is a new policy; previously sustainable transport was included within Preferred Option Policy CS4. The policy has been considerably revised to contain references to working with TfL, Network Rail and other partners, production of travel plans and travel assessments, links to safety of the public realm with encouraged walking and cycling, inclusion of freight transport. However, references to waterbourne transport have been removed.</p> <p>This policy is clearly focused on promoting sustainable transport, in particular through the location of developments and the provision of accessible and attractive routes and facilities for public transport, in particular walking and cycling. The policy also requires the production of travel plans and transport assessments. These mechanisms offer significant benefits in the long term with achieving SA Objective 8 regarding accessible facilities through an integrated transport system and SA Objective 12 with regard to reducing air pollution associated with transport.</p> <p>The addition of reference to 'freight' movements in a sustainable manner also contributes to future reductions in air pollution associated with transport movements if sustainable modes can be utilised.</p> <p><b>Recommendations</b> None proposed</p>			

CS9 – Promoting Better Education			
SA Objective	Short Term	Medium Term	Long Term
1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	-	-	-
2. Reduce crime and the fear of crime	-	-	-
3. Improve standard of health and wellbeing of those who live and work in the Borough	-	-	-
4. Increase the provision of and access to community facilities to meet local cultural, recreational and social needs	+	+	++
5. Improve educational attainment in schools	+	+	+
6. Improve opportunities for access to education and training for all residents	+	+	++
7. Reduce the overall level of deprivation	+	+	+
8. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system	+	+	+
9. Reduce production of waste and increase recycling	-	-	-
10. Reduce greenhouse gas emissions	-	-	-
11. Conserve energy	+	+	+
12. Improve air quality through a reduction in traffic-based emissions	-	-	-
13. Improve water quality and ensure the efficient use of water resources	-	-	-
14. Reduce the risk of flooding	-	-	-
15. Reduce contamination and safeguard soil quality and quantity	-	-	-
16. Make the best use of previously developed land (PDL) and existing buildings	-	-	-
17. Conserve and enhance biodiversity	-	-	-
18. Protect the ecological integrity of Natura 2000 sites	-	-	-
19. Maintain and enhance the quality of the green belt and open space areas.	-	-	-
20. Conserve and enhance the historic built and natural environment	-	-	-
21. Maintain and enhance the vitality and viability of the	-	-	-

<b>CS9 – Promoting Better Education</b>			
SA Objective	Short Term	Medium Term	Long Term
Borough's town centres			
22. Improve the local economy by attracting inward investment	-	-	-
23. Maintain stable levels of employment in the Borough	-	-	-
<p><b>Summary</b> This was previously policy CS5 within the Preferred Options consultation document. Since the consultation the policy has been revised and cross reference to the borough's natural environment has been removed and reference to redundant school sites.</p> <p>Through the allocation of land for new schools, and the requirement that new schools will be developed as community hubs the policy is enabling provision of education facilities for all spectrums of the boroughs population. These facilities are to be sustainably designed and energy efficient contributing to meeting climate change objectives and be accessible by public transport modes.</p> <p><b>Recommendations</b> None proposed</p>			

CS10 - Creating More Jobs and Reducing Worklessness			
SA Objective	Short Term	Medium Term	Long Term
1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	-	-	-
2. Reduce crime and the fear of crime	-	-	-
3. Improve standard of health and wellbeing of those who live and work in the Borough	-	-	-
4. Increase the provision of and access to community facilities to meet local cultural, recreational and social needs	-	-	-
5. Improve educational attainment in schools	+	+	+
6. Improve opportunities for access to education and training for all residents	+	++	++
7. Reduce the overall level of deprivation	+	++	++
8. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system	+	+	+
9. Reduce production of waste and increase recycling	-	-	-
10. Reduce greenhouse gas emissions	-	-	-
11. Conserve energy	-	-	-
12. Improve air quality through a reduction in traffic-based emissions	-	-	-
13. Improve water quality and ensure the efficient use of water resources	-	-	-
14. Reduce the risk of flooding	-	-	-
15. Reduce contamination and safeguard soil quality and quantity	-	-	-
16. Make the best use of previously developed land (PDL) and existing buildings	-	-	-
17. Conserve and enhance biodiversity	-	-	-
18. Protect the ecological integrity of Natura 2000 sites	-	-	-
19. Maintain and enhance the quality of the green belt and open space areas.	-	-	-
20. Conserve and enhance the historic built and natural environment	-	-	-
21. Maintain and enhance the vitality and viability of the	+	+	+

<b>CS10 - Creating More Jobs and Reducing Worklessness</b>			
SA Objective	Short Term	Medium Term	Long Term
Borough's town centres			
22. Improve the local economy by attracting inward investment	+	++	++
23. Maintain stable levels of employment in the Borough	+	++	++
<p><b>Summary</b></p> <p>This Policy has changed considerably since the Preferred Options Policy CS6. Overall, it has been considerably rationalised, in recognition of the fact that many key decisions should be made through the Development Management Plans DPD, Area Action Plan DPDs and through negotiating Planning Obligations, rather than through the Core Strategy.</p> <p>Overall, it is likely that there is a benefit to presenting a clear, concise message, i.e. the message that alongside the employment development to be allocated through the AAPs, there is a need to ensure adequate education and training facilities; and ensure good access, if local residents are to benefit from the employment opportunities that arise.</p> <p>The other key message set out within the Policy relates to the important role that planning obligations must play in ensuring employment development benefits local people. It is notable that the Policy is now considerably less prescriptive than was the case at the Preferred Options stage in terms of precisely what will be sought. In particular, there is no longer reference made to:</p> <ul style="list-style-type: none"> <li>• on-site employment, training and apprenticeship opportunities for local people both during the construction phase and post-construction; or</li> <li>• jobs brokerage initiatives [that] require developers to work in partnership with local employment and training programmes and delivery agencies in order to maximise opportunities for local people.</li> </ul> <p>It is also notable that specific reference to the following has also been removed from the Policy:</p> <ul style="list-style-type: none"> <li>• Promoting local small and medium-sized enterprises (SMEs) and supporting local business agreements which benefit local SMEs; and</li> <li>• Supporting the City Strategy Pathfinder/Work net programme to successfully deliver in-to-work, skills and training services to the most vulnerable and deprived sections of the community.</li> </ul> <p>In conclusion, despite the Policy having been considerably 'rationalised', it is thought that the findings of the appraisal of Preferred Policy CS6 - i.e. strong positive effects - remain broadly valid. It is clear that the approach promoted through this Policy will lead to benefits to both business and the community.</p> <p><b>Recommendations</b> None proposed</p>			

CS11 - Tourism Development and Visitor Attractions			
SA Objective	Short Term	Medium Term	Long Term
1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	-	-	-
2. Reduce crime and the fear of crime	-	-	-
3. Improve standard of health and wellbeing of those who live and work in the Borough	-	++	++
4. Increase the provision of and access to community facilities to meet local cultural, recreational and social needs	+	++	++
5. Improve educational attainment in schools	-	-	-
6. Improve opportunities for access to education and training for all residents	-	-	-
7. Reduce the overall level of deprivation	-	-	-
8. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system	-	-	-
9. Reduce production of waste and increase recycling	-	-	-
10. Reduce greenhouse gas emissions	-	-	-
11. Conserve energy	-	-	-
12. Improve air quality through a reduction in traffic-based emissions	-	-	-
13. Improve water quality and ensure the efficient use of water resources	-	-	-
14. Reduce the risk of flooding	-	-	-
15. Reduce contamination and safeguard soil quality and quantity	-	-	-
16. Make the best use of previously developed land (PDL) and existing buildings	-	-	-
17. Conserve and enhance biodiversity	X	X	X
18. Protect the ecological integrity of Natura 2000 sites	-	-	-
19. Maintain and enhance the quality of the green belt and open space areas.	+	++	++
20. Conserve and enhance the historic built and natural environment	-	-	-
21. Maintain and enhance the vitality and viability of the	+	+	+

CS11 - Tourism Development and Visitor Attractions			
SA Objective	Short Term	Medium Term	Long Term
Borough's town centres			
22. Improve the local economy by attracting inward investment	+	+	+
23. Maintain stable levels of employment in the Borough	-	-	-
<p><b>Summary</b> This Policy seeks to ensure that tourism development and visitor attractions are focused first and foremost in Walthamstow. This should lead to wide-ranging benefits. In particular, it is in-line with the aim of the Waltham Forest Sustainable Community Strategy to 'transform Walthamstow town centre into an asset for the Borough, with quality shopping, healthy businesses and workspace, leisure, an iconic market and cinema, and vibrant day and evening economies'. Ensuring that visitors are drawn primarily to Walthamstow will also ensure that there is the greatest opportunity to make use of public transport.</p> <p>At the same time, the Policy also recognises that the particular assets associated with the District mean that there is a need to promote visitor growth outside of Walthamstow. Investment in these assets should also increase the potential for local communities to access and benefit from them. This is an important objective in terms of encouraging outdoor recreation and health and well-being more generally.</p> <p>However, the policy seeks to promote the development of the Walthamstow Wetlands as a significant visitor destination and this is likely to have negative effects in relation to conserving and enhancing biodiversity.</p> <p><b>Recommendations</b> Appropriate mitigation is required to ensure that the biodiversity features of the Walthamstow Wetlands are not affected by its promotion as a significant visitor destination.</p>			

CS12 - Protecting and Enhancing Heritage Assets			
SA Objective	Short Term	Medium Term	Long Term
1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	-	-	-
2. Reduce crime and the fear of crime	-	-	-
3. Improve standard of health and wellbeing of those who live and work in the Borough	-	-	-
4. Increase the provision of and access to community facilities to meet local cultural, recreational and social needs	+	+	+
5. Improve educational attainment in schools	-	-	-
6. Improve opportunities for access to education and training for all residents	-	-	-
7. Reduce the overall level of deprivation	-	-	-
8. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system	-	-	-
9. Reduce production of waste and increase recycling	-	-	-
10. Reduce greenhouse gas emissions	-	-	-
11. Conserve energy	-	-	-
12. Improve air quality through a reduction in traffic-based emissions	-	-	-
13. Improve water quality and ensure the efficient use of water resources	-	-	-
14. Reduce the risk of flooding	-	-	-
15. Reduce contamination and safeguard soil quality and quantity	-	-	-
16. Make the best use of previously developed land (PDL) and existing buildings	-	-	-
17. Conserve and enhance biodiversity	-	-	-
18. Protect the ecological integrity of Natura 2000 sites	-	-	-

CS12 - Protecting and Enhancing Heritage Assets			
SA Objective	Short Term	Medium Term	Long Term
19. Maintain and enhance the quality of the green belt and open space areas.	-	-	-
20. Conserve and enhance the historic built and natural environment	++	++	++
21. Maintain and enhance the vitality and viability of the Borough's town centres	++	++	++
22. Improve the local economy by attracting inward investment	+	+	+
23. Maintain stable levels of employment in the Borough	-	-	-
<p><b>Summary</b> This Policy is considerably stronger than the policy relating to built heritage assets that was included at the Preferred Options stage (part G of Policy CS9). The Policy recognises that evidence exists to allow a proactive approach to planning for historic character, rather than solely planning to protect designated heritage assets. There is an emphasis on taking into account what is locally important (e.g. certain areas that show 'cohesive design' from the early 20<sup>th</sup> Century, as well as what is recognised at nationally important (e.g. listed buildings and conservations areas).</p> <p>The Policy explicitly sets out to take an approach to conserving the historic environment that seeks to increase access and ensure ongoing utility. The supporting text includes quite strong wording regarding the role of heritage in regeneration schemes.</p> <p><b>Recommendations</b> None proposed</p>			

<b>CS13 - Promoting Health and Fitness</b>			
SA Objective	Short Term	Medium Term	Long Term
1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	-	-	-
2. Reduce crime and the fear of crime	-	-	-
3. Improve standard of health and wellbeing of those who live and work in the Borough	++	++	++
4. Increase the provision of and access to community facilities to meet local cultural, recreational and social needs	+	+	+
5. Improve educational attainment in schools	-	-	-
6. Improve opportunities for access to education and training for all residents	-	-	-
7. Reduce the overall level of deprivation	-	-	-
8. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system	-	+	+
9. Reduce production of waste and increase recycling	-	-	-
10. Reduce greenhouse gas emissions	-	-	-
11. Conserve energy	-	-	-
12. Improve air quality through a reduction in traffic-based emissions	-	-	-
13. Improve water quality and ensure the efficient use of water resources	-	-	-
14. Reduce the risk of flooding	-	-	-
15. Reduce contamination and safeguard soil quality and quantity	-	-	-
16. Make the best use of previously developed land (PDL) and existing buildings	-	-	-
17. Conserve and enhance biodiversity	-	-	-
18. Protect the ecological integrity of Natura 2000 sites	-	-	-

<b>CS13 - Promoting Health and Fitness</b>			
SA Objective	Short Term	Medium Term	Long Term
19. Maintain and enhance the quality of the green belt and open space areas.	-	-	-
20. Conserve and enhance the historic built and natural environment	-	-	-
21. Maintain and enhance the vitality and viability of the Borough's town centres	-	-	-
22. Improve the local economy by attracting inward investment	-	-	-
23. Maintain stable levels of employment in the Borough	-	-	-
<p><b>Summary</b> The policy aims to create and develop healthy and sustainable places and communities. It offers the potential for significant benefits in relation to improving the health and wellbeing of those who live and work in the Borough through improving access to open spaces, health facilities and services, leisure, sports and recreation facilities.</p> <p>There are also benefits associated with improving pedestrian and cycle access to green and open spaces, including the Olympic Park, and through making the public realm more attractive and safer for pedestrians and cyclists. This will contribute towards SA Objective 8.</p> <p><b>Recommendations</b> The policy references 'proliferation of unhealthy uses' but the supporting text indicates that this refers only to hot food takeaways. If this is the case then perhaps the policy should be amended to state it is the proliferation of hot food takeaways that is the issue.</p>			

CS14 - Creating Attractive and Vibrant Town Centres			
SA Objective	Short Term	Medium Term	Long Term
1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	-	-	-
2. Reduce crime and the fear of crime	-	+	+
3. Improve standard of health and wellbeing of those who live and work in the Borough	-	-	-
4. Increase the provision of and access to community facilities to meet local cultural, recreational and social needs	-	+	+
5. Improve educational attainment in schools	-	-	-
6. Improve opportunities for access to education and training for all residents	-	-	-
7. Reduce the overall level of deprivation	-	-	-
8. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system	-	-	-
9. Reduce production of waste and increase recycling	-	-	-
10. Reduce greenhouse gas emissions	-	-	-
11. Conserve energy	-	-	-
12. Improve air quality through a reduction in traffic-based emissions	-	+	+
13. Improve water quality and ensure the efficient use of water resources	-	-	-
14. Reduce the risk of flooding	-	-	-
15. Reduce contamination and safeguard soil quality and quantity	-	-	-
16. Make the best use of previously developed land (PDL) and existing buildings	+	+	+
17. Conserve and enhance biodiversity	-	-	-
18. Protect the ecological integrity of Natura 2000 sites	-	-	-

<b>CS14 - Creating Attractive and Vibrant Town Centres</b>			
SA Objective	Short Term	Medium Term	Long Term
19. Maintain and enhance the quality of the green belt and open space areas.	-	-	-
20. Conserve and enhance the historic built and natural environment	-	-	-
21. Maintain and enhance the vitality and viability of the Borough's town centres	+	++	++
22. Improve the local economy by attracting inward investment	+	++	++
23. Maintain stable levels of employment in the Borough	-	-	-
<p><b>Summary</b> This Policy seeks to ensure that growth is allocated sequentially - i.e. to town, district and local centres in preference to 'edge-of-centre' or 'out-of-centre' locations - and also to particular centres according to their place in a well established hierarchy. It is intended to reinforce the existing hierarchy of centres, although there is a focus on ensuring that district Centres can progressively develop as fully functioning mixed-use and higher density urban centres with greatly enhanced public transport, access and appropriate parking facilities. It is thought that this approach to reinforcing and enhancing the hierarchy will lead to benefits in terms of a number of sustainability objectives.</p> <p>The Policy makes several important commitments:</p> <ul style="list-style-type: none"> <li>• Town Centre Strategies will be developed with the aim of ensuring that centres are distinct / differentiated, with a unique 'offer'. By way of example, it is suggested that Walthamstow Market is central to what makes Walthamstow centre distinct, whilst other centres may have a greater focus on creative industries.</li> <li>• As part of a strategy for any particular centre, the Council will intervene ensure an appropriate grouping of uses, with a particular focus on preventing proliferation of uses that are detrimental to communities (including hot food takeaways).</li> <li>• The Development Management Policies DPD will establish retail/non retail thresholds applicable to the designated centres. By safeguarding retail premises, the Council hopes that in time there would be a gradual process of relocation of shops from the declining/marginal trading locations into the heart of these centres where they could cluster and thrive.</li> <li>• Walthamstow Town Centre has the potential for the development of an appropriate cluster of evening economy activities. The Policy identifies criteria to ensure that any potential negative effects are avoided, and also states that planning obligations may be sought to contribute towards the cost of creating and managing the evening and night time economy.</li> </ul> <p><b>Recommendations</b> There is no evidence to suggest that any altered or alternative approach would be preferable.</p>			

CS15 – Well designed buildings, places and spaces			
SA Objective	Short Term	Medium Term	Long Term
1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	-	-	-
2. Reduce crime and the fear of crime	+	+	++
3. Improve standard of health and wellbeing of those who live and work in the Borough	+	+	+
4. Increase the provision of and access to community facilities to meet local cultural, recreational and social needs	-	-	-
5. Improve educational attainment in schools	-	-	-
6. Improve opportunities for access to education and training for all residents	-	-	-
7. Reduce the overall level of deprivation	-	-	-
8. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system	-	-	-
9. Reduce production of waste and increase recycling	-	-	-
10. Reduce greenhouse gas emissions	-	-	-
11. Conserve energy	-	-	-
12. Improve air quality through a reduction in traffic-based emissions	-	-	-
13. Improve water quality and ensure the efficient use of water resources	-	-	-
14. Reduce the risk of flooding	-	-	-
15. Reduce contamination and safeguard soil quality and quantity	-	-	-
16. Make the best use of previously developed land (PDL) and existing buildings	+	+	+
17. Conserve and enhance biodiversity	-	-	-
18. Protect the ecological integrity of Natura 2000 sites	-	-	-

<b>CS15 – Well designed buildings, places and spaces</b>			
SA Objective	Short Term	Medium Term	Long Term
19. Maintain and enhance the quality of the green belt and open space areas.	-	-	-
20. Conserve and enhance the historic built and natural environment	+	+	+
21. Maintain and enhance the vitality and viability of the Borough's town centres	+	+	+
22. Improve the local economy by attracting inward investment	-	-	-
23. Maintain stable levels of employment in the Borough	-	-	-
<p><b>Summary</b></p> <p>The policy has been revised considerably since the preferred options, it was previously policy CS9.</p> <p>Through the mechanisms in place within the policy text high quality design which responds to the local character and context and improves the function of a place will be encouraged. This focus should maintain and enhance the town centres vitality and viability and also contribute to conserving the historic environment.</p> <p>Height and scale of buildings will be sensitively considered and consideration will be had to the safety implications of new developments.</p> <p><b>Recommendations</b></p> <p>None proposed</p>			

<b>CS16 – Making Waltham Forest Safer</b>			
<b>SA Objective</b>	<b>Short Term</b>	<b>Medium Term</b>	<b>Long Term</b>
1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	-	-	-
2. Reduce crime and the fear of crime	+	++	++
3. Improve standard of health and wellbeing of those who live and work in the Borough	+	+	+
4. Increase the provision of and access to community facilities to meet local cultural, recreational and social needs	-	-	-
5. Improve educational attainment in schools	-	-	-
6. Improve opportunities for access to education and training for all residents	-	-	-
7. Reduce the overall level of deprivation	-	-	-
8. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system	-	-	-
9. Reduce production of waste and increase recycling	-	-	-
10. Reduce greenhouse gas emissions	-	-	-
11. Conserve energy	-	-	-
12. Improve air quality through a reduction in traffic-based emissions	-	-	-
13. Improve water quality and ensure the efficient use of water resources	-	-	-
14. Reduce the risk of flooding	-	-	-
15. Reduce contamination and safeguard soil quality and quantity	-	-	-
16. Make the best use of previously developed land (PDL) and existing buildings	-	-	-
17. Conserve and enhance biodiversity	-	-	-
18. Protect the ecological integrity of Natura 2000 sites	-	-	-

<b>CS16 – Making Waltham Forest Safer</b>			
SA Objective	Short Term	Medium Term	Long Term
19. Maintain and enhance the quality of the green belt and open space areas.	-	-	-
20. Conserve and enhance the historic built and natural environment	-	-	-
21. Maintain and enhance the vitality and viability of the Borough's town centres	-	-	-
22. Improve the local economy by attracting inward investment	-	-	-
23. Maintain stable levels of employment in the Borough	-	-	-
<p><b>Summary</b> Since the preferred options, this policy has been refined and now focuses on design, land use and public realm. Over the plan period this policy should achieve significant benefits with regard to reducing crime and the fear of crime.</p>			

## Appendix 5 – Draft Pre-Submission SA Recommendations

The table below details the proposed mitigation recommendations from the initial draft pre-submission SA Report and outlines the Council's response to these recommendations. Further mitigation recommendations have been made in respect of the finalised pre-submission policies and these are detailed in the main report (Section 19.3).

Policy	Recommendations proposed	Council's Response
CS1	As a strategic policy, reference to climate change with the main policy text would be advised, or cross reference to CS5.	SA recommendations accepted and incorporated into the revised (for consultation) Proposed Submission Core Strategy.
CS2	Consider providing cross reference to CS5 - minimising and adapting to climate change, CS6 – enhancing green infrastructure and biodiversity and CS7 - promoting sustainable waste management and recycling.  Within the supporting text specifically mention the requirement to deliver housing to lifetime homes standards and be wheelchair accessible in accordance with London Plan policy requirements.	Acknowledge the need to cross reference CS5, CS6 and CS7.  Lifetime homes/wheelchair housing, the issue will be dealt with in the Development Management Policies document.
CS3	There is no evidence to suggest that any altered or alternative approach would be preferable.	SA recommendations accepted.
CS4	Consider including reference to accessibility of the social infrastructure facilities in particular with regard to sustainable transport and walking. Within the supporting text further guidance should be contained to explain the Social Infrastructure Audit to the description of individual social infrastructure.	Reference will be made to accessibility of social infrastructure facilities and incorporated into the revised (for consultation) Proposed Submission Core Strategy.  Reference to 'Social Infrastructure Audit' to be removed from policy sentence.
CS5	Define 'highest feasible' environmental standards with regard to BREEAM and CSH (point B) to ensure that the mandatory standards are met (for social housing). Consider including reference to the London Plan 20% target in the main policy text not just the supporting text.	Reference to 'highest feasible' environmental standards – has been changed to read 'high environmental standards'. This will be defined in the emerging Development Management Policies document.  It is noted that the 20% target has

Policy	Recommendations proposed	Council's Response
		been omitted from the policy text in accordance with the emerging new London Plan.
CS6	Consider specific mention of the designated international, national, regional and local habitats and sites for biodiversity in either the policy or supporting text rather than just general references.	SA recommendation accepted and incorporated into the revised (for consultation) Proposed Submission Core Strategy.
CS7	Consider mentioning the London Plan recycling requirements in the main policy text as a key driver rather than the supporting text.	London Plan recycling requirements have been referred to in the justification. This is accepted as key driver, but we do not consider it necessary to refer to this in the policy sentence.
CS8	Consider referencing waterbourne public transport in London and how Waltham Forest's transport system can link to this (as this was previously within the Preferred Options Policy).	Whilst acknowledging the importance of waterborne transport in London, we have no evidence demonstrating the potential for Waltham Forest's transport system to link with this.
CS9	There is no evidence to suggest that any altered or alternative approach would be preferable.	SA recommendations accepted.
CS10	It is recognised that the benefits of this policy will be felt by the most deprived communities in the Borough (as it is these communities that will see employment growth allocated through AAPs). However, it is suggested that the Policy could make increased reference to maximising benefits for the most vulnerable and deprived sections of the community.	SA recommendation accepted and incorporated into the revised (for consultation) Proposed Submission Core Strategy.
CS11	There is no evidence to suggest that any altered or alternative approach would be preferable.	SA recommendations accepted.
CS12	It is suggested that the supporting text relating to the relationship between heritage and regeneration might be strengthen. Currently, the text does not refer to the potential for regeneration to be 'heritage-led', but rather discusses the role of heritage in rather less	SA recommendation accepted and incorporated into the revised (for consultation) Proposed Submission Core Strategy.

Policy	Recommendations proposed	Council's Response
	<p>proactive terms (referring to the importance of 'not ignoring' the historic environment, and ensuring the significance of historic buildings and areas is properly assessed'.</p>	
CS13	<p>It is suggested that the supporting text should cross reference to green infrastructure related planning objectives, and perhaps also cross-reference to the objective of accessing local services, facilities and employment through an integrated transport system.</p> <p>Further clarification should be provide to enable the implementation of 'protecting people from unsafe, unhealthy and polluting activities'.</p>	<p>SA recommendation accepted and incorporated into the revised (for consultation) Proposed Submission Core Strategy.</p>
CS14	<p>There is no evidence to suggest that any altered or alternative approach would be preferable.</p>	<p>SA recommendations accepted.</p>
CS15	<p>Include within the supporting text cross references to CS5 with regard to sustainable materials, sustainable construction and overarching climate change and energy efficiency which are all intrinsically linked the design quality. Also consider mentioning that further guidance on CABE/HBF Building for Life criteria will be contained within the Inclusive design SPD or mention it within the supporting text as currently it is only referred to in the Implementation section with no context in the main policy text.</p>	<p>SA recommendation accepted and incorporated into the revised (for consultation) Proposed Submission Core Strategy.</p>
CS16	<p>There is no evidence to suggest that any altered or alternative approach would be preferable.</p>	<p>SA recommendations accepted.</p>