



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

Appendix E: Spatial Strategy Options Assessment Summaries



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Prepared by:




ClearLead Consulting Limited

The Barn, Cadhay, Ottery St Mary, Devon EX11 1QT

www.clearleadconsulting.com

01404 814273

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Signature	
Checked by	V Pearson
Signature	
Authorised by	V Pearson
Signature	
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Table of Contents

1	Introduction	5
2	Performance of the New Spatial Strategy Option	6
2.1	Blackhorse Lane	6
2.2	Walthamstow Town Centre	8
2.3	Lea Bridge Corridor.....	11
2.4	Leyton.....	13
2.5	South Leytonstone.....	15
2.6	Bakers Arm/Leyton Green.....	18
2.7	Wood Street.....	20
2.8	North Circular Corridor / Meridian Water Extension.....	22
2.9	Chapel End/Forest Road Corridor.....	24
2.10	Highams Park	26
2.11	Leytonstone	28
2.12	Norlington Strip	30
2.13	Whipps Cross	32
2.14	North Chingford	34
2.15	Sewardstone Road	36
2.16	New Spitalfields	38
2.17	Potential Cumulative Effects of the New Spatial Strategy.....	41
3	Performance of the Existing Spatial Strategy Option.....	44
3.1	Blackhorse Lane Growth Area	44
3.2	Northern Olympic Fringe Growth Area	46
3.3	Walthamstow Town Centre Growth Area	48
3.4	Wood Street Growth Area	50
3.5	Walthamstow Major Centre.....	51
3.6	Bakers Arms District Centre.....	53
3.7	Chingford District Centre.....	54
3.8	Highams Park District Centre.....	56
3.9	Leyton District Centre	57
3.10	Leytonstone	59
3.11	South Chingford District Centre.....	61
3.12	Wood Street District Centre	62
3.13	Blackhorse Lane Neighbourhood Centre	64
3.15	Chingford Mount Neighbourhood Centre.....	66
3.16	Markhouse Corner Neighbourhood Centre	67

3.17	Sewardstone Road Neighbourhood Centre.....	69
3.18	Thatched House Neighbourhood Centre.....	71
3.19	Potential Cumulative Effects of the Existing Spatial Strategy	72

1 Introduction

This appendix presents the findings of the assessment of two spatial options considered as part of the development of the Waltham Forest Local Plan; a new spatial strategy and the existing spatial strategy. See Section 6 of the Main SA Report for further details. . The assessments were undertaken in August / September 2018 and the findings reported to London Borough of Waltham Forest officers.

Summaries of the assessment of each of the 'clusters' which form the New Spatial Strategy are presented in Section 2 and the performance of the 'clusters' which form the existing spatial strategy are presented in Section 3. Information is presented for each cluster including the proposed policy principles, a diagram and written summary of performance and mitigation and enhancement measures put forward.

2 Performance of the New Spatial Strategy Option

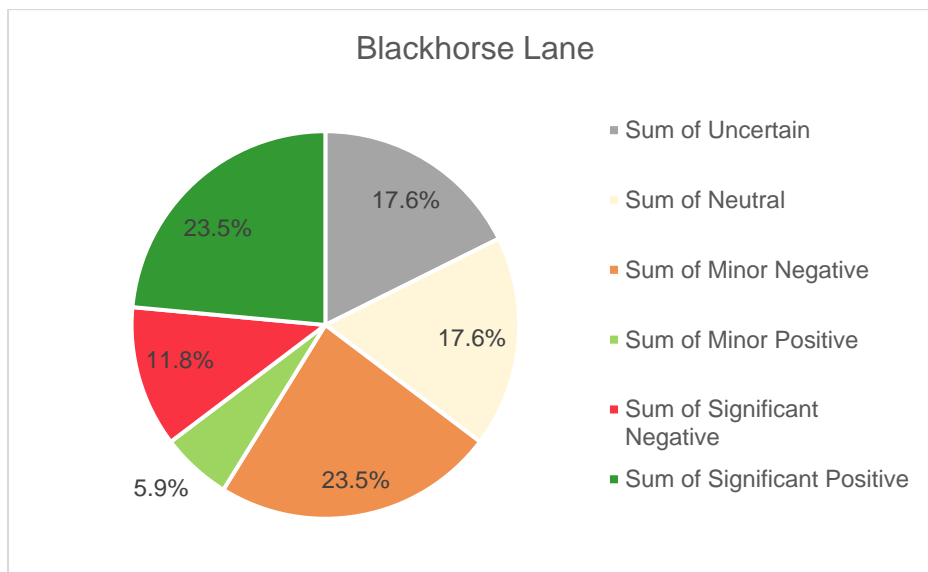
2.1 Blackhorse Lane

2.1.1 Proposed Policy Principles

The following proposed policy principles have been put forward:

- Amend existing Area Action Plan boundary
- Protect existing Strategic Industrial Land (SIL) floorspace – explore opportunities for intensification (purposely for employment and industrial uses) or for mixed use development
- Protect retail uses within recently developed area
- Manage retail decline outside the designated neighbourhood centre boundary/elsewhere along Forest Road.
- Support/encourage environmental/public realm improvements at the Forest Road/Blackhorse junction

2.1.2 Assessment



The assessment of Blackhorse Lane identified the potential for significant negative effects with regards to flooding (SA11). Site HIH47 is partially located within both flood zone 3 and 2, whilst site WIM21 is partially located within flood zone 2. A Flood Risk Assessment will be required to determine suitability for development and mitigation would be required.

Further significant negative effects have been identified in relation to SA14 (Protect the ecological integrity of SSSI and Natura 2000 sites), as all sites within the cluster are located less than 400m away from Lee Valley SPA. Ecological assessment and mitigation would be

needed for potential impact on habitats and species within Lee Valley SPA and Walthamstow Reservoir SSSI. The HRA screening exercise has identified likely significant effects on European sites associated with development in all parts of the borough.

Significant positive effects have been identified in relation to housing need (SA1) as the cluster aims to deliver between 2350- 2750 new dwellings, however policy does not yet determine the range of tenures and size, so there is still some uncertainty. All sites within the cluster are located away from the Borough's Locally Important Geological Sites (LIGS) and all sites are located on previously developed land. This has resulted in a significant positive effect as it works towards the protection of soil and geological resources.

The Cluster contains the Sutherland Road employment Site, which is within walking distance of all the proposed development sites. Policy principle aims to “Protect existing Strategic Industrial Land (SIL) floorspace – explore opportunities for intensification (purposely for employment and industrial uses) or for mixed use development”. It is not known for certain but this could help to safeguard the existing employment sites as well as result in a number of new businesses and employment opportunities. This has resulted in a significant positive effect on SA19 (improve the local economy) and SA20 (maintain stable levels of employment).

Uncertainty has been recorded with regards to crime (SA2) as it is unlikely that the allocation of these sites will affect crime. However, policy includes the encouragement of public realm improvements at Forest Road and Blackhorse Junction, which could help to create a safer community.

There is a lack of healthcare facilities within the cluster, however, there is a good provision of recreational facilities, with good access to footpaths around Walthamstow reservoirs as well as Lee Valley Park - Douglas Eyre Playing Fields. Deprivation with regards to health and disability is low. Policy includes town centre and public realm improvements, which could include the incorporation of open space. This could work towards improving the standards of health and wellbeing of residents within the cluster, however, this is not known for certain, so uncertainty has been recorded.

The cluster is located outside of a town/district centre, but sites WIM21, HIS33 and HIS35 are within walking distance of Walthamstow. It is not clear how the development will enhance the vitality and viability of town centre (SA18). Uncertainty once again has been recorded.

2.1.3 Mitigation & Enhancements

The following Mitigation has been identified:

- SA2: Include policy within the Local Plan to encourage reductions in crime through design of developments.
- SA3: Seek to improve access to healthcare facilities through provision of new facilities.

- SA11: Flood risk assessment required as a part of planning permission and mitigation put in place to manage drainage on site.
- SA13/14: Ecological assessment and mitigation required for potential effects on the deciduous woodland habitat as well as the sensitive habitats within Lee Valley SPA and Walthamstow Reservoir SSSI. AA of Local Plan required to assess effects on European sites and put forward avoidance / mitigation measures.
- SA7 and SA9: Consider providing car charging points to improve the uptake up electric car usage. Consider limiting car parking provision in order to reduce risk of increasing air pollution.

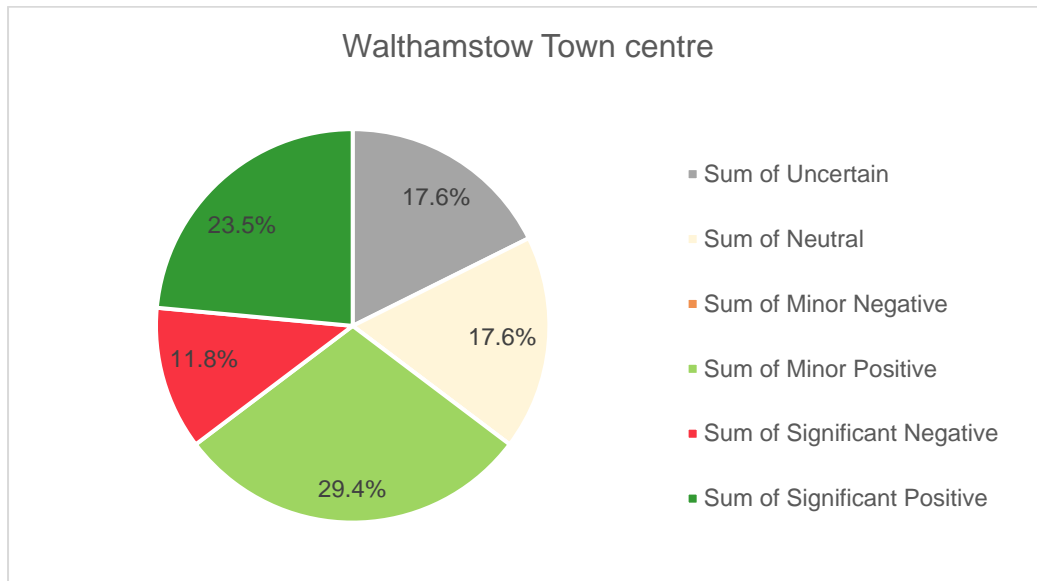
2.2 Walthamstow Town Centre

2.2.1 Proposed Policy Principles

The following proposed policy principles have been put forward:

- Redevelopment of 'The Mall'/Selbourne Walk shopping centre
- Managing changes of use within designated frontages
- Protecting the vitality and viability of the centre
- Continue to protect the Market, seek further improvements
- Develop the leisure and entertainment offer of the town centre
- Promote local distinctiveness of parts of the centre - St James Quarter at the western end of the High Street
- Protect existing employment and diversify range of employment activities
- Promote sustainable forms of transport within the centre.
- High density living and intensification at identified locations/areas

2.2.2 Assessment



The assessment of Walthamstow Town Centre has resulted in significant negative effects with regards to the conservation and enhancement of the historic built environment (SA17). Sites HIS44, HIS09, HIS14 are all located within the Walthamstow St James Conservation Area, whilst site HIS08 is located adjacent to the conservation area. Development of these sites has potential to give rise to significant negative effects on heritage assets, which could result in their loss, destruction or material damage. Mitigation would be required in order to avoid negative effect on conservation area and/or listed buildings and scheduled monuments in close proximity to the proposed sites.

All sites are located over 1km away from a SAC, SPA or SSSI, however, the HRA screening exercise has identified likely significant effects on European sites associated with development in all parts of the borough. Therefore a significant negative effect has been identified in relation to SA14 (Protect the ecological integrity of SSSI and Natura 2000 sites).

Significant positive effects have been identified in relation to housing need (SA1) as the cluster aims to deliver between 2350-2800 new dwellings, which will be of high density. Policy does not yet determine the range of tenures and size, so there is still some uncertainty. All sites within the cluster are located away from the Borough's Locally Important Geological Sites (LIGS) and all sites are located on previously developed land. This has resulted in a significant positive effect as it works towards the protection of soil and geological resources.

The cluster has good access to sustainable transport links, particularly rail services, as both Walthamstow Central (Victoria and Overground services) and St James St (Overground services) stations are located within the cluster. This public transport offering is reflected in the high PTAL scores (4-6B). Planning policy aims to promote sustainable forms of transport within the centre, which could help to reduce the need for private car usage. This has resulted in a significant positive effect on SA5 (Improve opportunities for access to local services).

Policy aims to protect existing employment and diversify range of employment activities. It has been assumed that this will maintain the existing level of employment in the cluster as well as more employment opportunities and growth in new sectors. For this reason, a significant positive effect has been identified in relation SA20 (maintaining stable levels of employment).

Uncertainty has arisen with regards to crime (SA2) as it is unlikely that the allocation of these sites will affect crime, this could be more likely be affected by policy, such as in relation to design. The cluster has poor access to recreational facilities, with sites MA37, MA38, MA06 and HIS44 being located beyond walking distance from any recreational facilities. Planning policy aims to develop the leisure and entertainment offer of the town centre. It is not known for certain but this could be beneficial for health and wellbeing. For this reason, uncertainty has been recorded in relation to SA3.

The Cluster is considered to be deprived with regards to barriers to housing and services. The addition of more homes may well help address the existing housing shortage but may not necessarily support community cohesion. Uncertainty has therefore been recorded in relation to SA4.

2.2.3 Mitigation & Enhancements

The following Mitigation has been identified:

- SA2: Include policy within the Local Plan to encourage reductions in crime through design of developments.
- SA14: AA of Local Plan required to assess effects on European sites and put forward avoidance / mitigation measures.
- SA17: Development will need to be assessed for visual impact and designed well to avoid any negative effect on the conservation area, nearby historic assets and to enhance the area.

The following enhancement measures have been identified:

- SA7: Consider providing car charging points to improve the uptake up electric car usage.

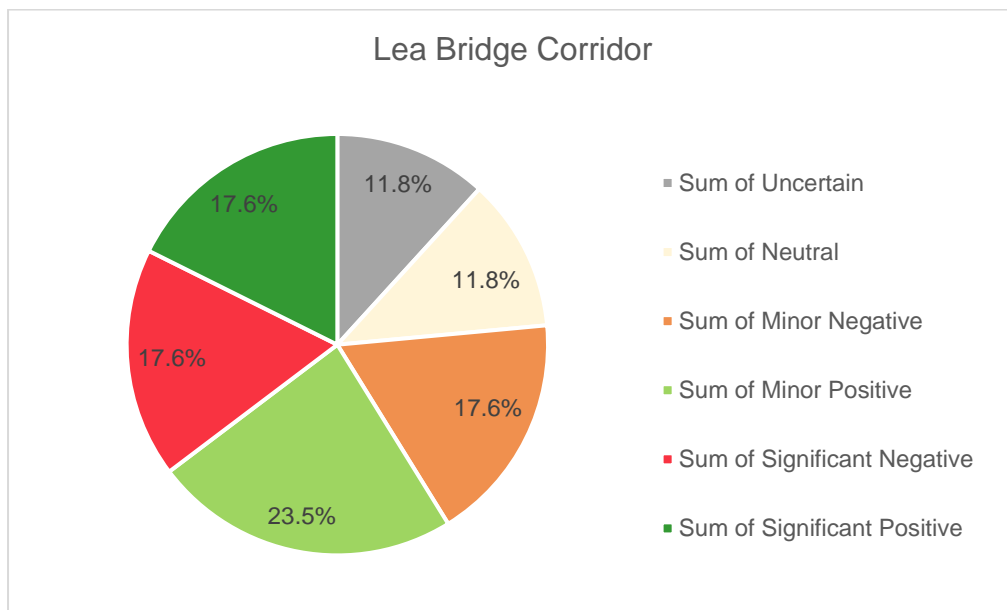
2.3 Lea Bridge Corridor

2.3.1 Proposed Policy Principles

The following proposed policy principles have been put forward:

- Explore opportunities for co-location and intensification of use at Rigg Approach, whilst retaining existing SIL designation and employment floorspace involving some residential/community uses – subject to masterplan/ employment strategy
- Protect existing SIL at Argall Avenue – explore opportunities for intensification (purposely for employment and industrial uses)
- Consolidate retail activities in designated centres and new retail parades
- High density living and intensification at identified locations/areas - tall buildings cluster around the station
- Explore possibility of mixed-use residential on the Aldi store site on Heybridge Way
- Consider connectivity improvements East to West other than Lea Bridge Road

2.3.2 Assessment



The assessment of Lea Bridge Corridor has resulted in significant negative effects with regards to health and wellbeing (SA3). Provision of both healthcare and recreational facilities to the study sites within the Growth Area are relatively poor. This situation is likely to worsen with the development of new residences and no proposed increase in healthcare facilities included within the Proposed Policy Principles.

Significant negative effects have also been identified in regard to flooding (SA11). The majority of study sites within this cluster are situated within a Zone 3 Flood Zone, and

therefore not resilient to climate change. A Flood Risk Assessment will be required to determine suitability for development and mitigation would be required.

Further significant negative effects have been identified in regard to SA14 (Protect the ecological integrity of SSSI and Natura 2000 sites). Sites LEB35, LEB06, LEB11, LEB12 and LEB38 are located 200-800m from a Walthamstow Marshes SSSI. These sites, in addition to sites LEB54, LEB53, LEB10 and LEB27, also fall within 1km of the Lea Valley SPA. Development of these sites may have negative effects on these ecological sites of local importance. The HRA screening exercise has identified likely significant effects on European sites associated with development in all parts of the borough.

Significant positive effects have been identified in relation to housing need (SA1) as the cluster aims to deliver between 1100 – 1450 new dwellings, which will be of high density. Policy does not yet determine the range of tenures and size, so there is still some uncertainty. All sites within the cluster are located away from the Borough's Locally Important Geological Sites (LIGS) and all sites are located on previously developed land. This has resulted in a significant positive effect as it works towards the protection of soil and geological resources.

Significant positive effects have also been identified in relation to community cohesion and the provision of community facilities (SA4). Sites LEB53, LEB10 and LEB27 only are within 0.4km of a Town, Local, Neighbourhood or District Centre. All sites with the exception of LEB35 are in close proximity to primary and secondary schools. However, access to a place of worship, shopping frontage, recreational facilities and in particular a community centre is relatively poor. Proposed Policy Principles may help to lessen these distances between study sites and facilities, especially through opportunities for co-location at Rigg Approach to involve some community uses. They may also be lessened somewhat through the consolidation of retail activities and new retail parades.

Whilst proximity to a Neighbourhood or Local Centre is also relatively limited for most sites within the Proposed Growth Area, the proposed consolidation of retail activities and new retail parades will help to improve this. In addition, distance to Borough Employment Areas will also likely be reduced through this provision, as well as through the opportunities for intensification of strategic industrial land at Argall Avenue. This has resulted in a significant positive effect on SA19 (improving the local economy). The retention of strategic employment land could well mean that jobs in the Growth Area will be safeguarded. The intensification of use at Rigg Approach along with the addition of new retail parades could result in further employment opportunities. However, at this stage it is not known for certain, and therefore uncertainty has been recorded in relation to SA20 (maintain stable levels of employment).

Uncertainty has also been recorded in relation to SA18 (vitality and viability of the Borough's town centres). None of the study sites within the Growth Area are within 0.8km of a Town Centre, and whilst policy seeks to consolidate retail activities in designated centres and provide new retail parades, this will be unlikely to result in access to a Town Centre improving. The development would therefore be unlikely to support the existing Town

Centre, but rather detract from the Town Centre by providing facilities which would attract people towards the Proposed Growth Area.

Sites to the North of Lea Bridge Road within this cluster are amongst the 10% most deprived neighbourhoods in the country with regards to crime, whereas those South of Lea Bridge Road are amongst the 20% most deprived neighbourhoods. It is unlikely that the allocation of this site will affect crime, this is will more likely be affected by policy, such as in relation to design. For this reason, uncertainty has been recorded in relation to crime (SA2).

2.3.3 Mitigation & Enhancements

The following Mitigation has been identified:

- SA2: Include policy within the Local Plan to encourage reductions in crime through design of developments.
- SA3: An increase in provision of healthcare facilities would reduce remand on existing facilities. Increased recreational facilities may also alleviate healthcare demands as a result of physical and mental health benefits associated with access to green space and exercise.
- SA7 and SA9: Consider providing car charging points to improve the uptake up electric car usage. Consider limiting car parking provision in order to reduce risk of increasing air pollution.
- SA11: Flood risk assessment required as a part of planning permission and mitigation put in place to manage drainage on site.
- SA14: AA of Local Plan required to assess effects on European sites and put forward avoidance / mitigation measures.
- SA18: Increased and improved sustainable transport nodes could encourage two-way traffic between Town/District Centre and Neighbourhood/Local Centre.

The following enhancement measures have been suggested:

- SA17: Policy could require design to ensure that negative effects on nearby listed buildings and their settings are avoided.

2.4 Leyton

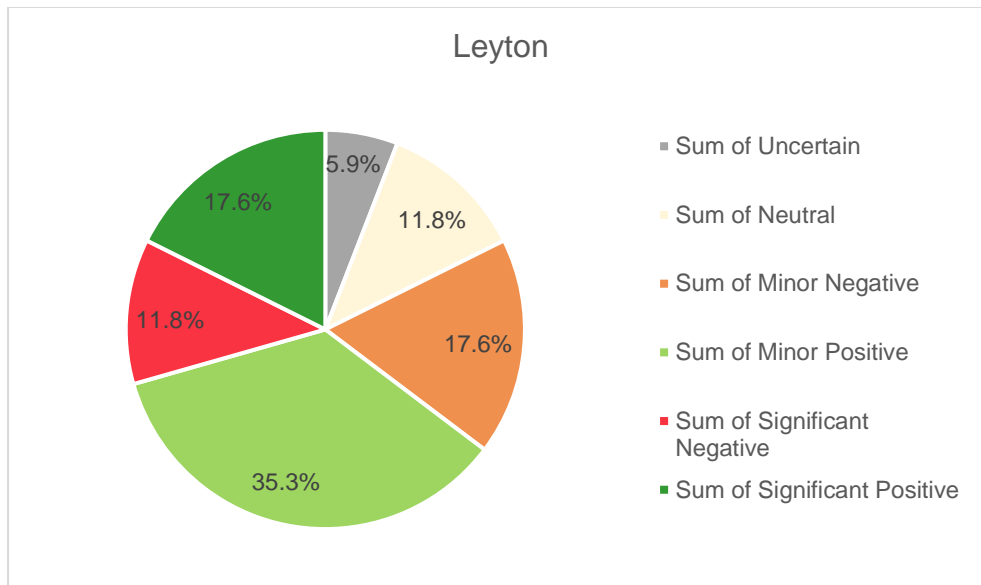
2.4.1 Proposed Policy Principles

The following proposed policy principles have been put forward:

- Review existing District Centre boundary

- Leyton Temple Mills – Redevelopment/integration with rest of District centre
- High density living and intensification at identified locations/areas
- Leyton Station improvements
- Opportunities for a new station (Ruckholt Road)

2.4.2 Assessment



The assessment of the Leyton Growth Area has resulted in significant negative effects in relation to the conservation and enhancement of the historic built environment (SA17). Sites LE07 and GRG25 are adjacent to a conservation area, and LE01 is less than 50m from the same conservation area. No listed buildings nor historic parks or gardens are likely to be affected by the proposed development. Development of these sites has potential to give rise to significant negative effects on setting and integrity of the conservation area, mitigation would therefore be required in order to avoid any negative effect.

None of the sites within this cluster are within the specified 800m or 2km to a SSSI or a Natura 2000 site respectively. However, the HRA screening exercise has identified likely significant effects on European sites associated with development in all parts of the borough. Therefore a significant negative effect has been identified with regards to SA14.

Significant positive effects have been identified in relation to housing need (SA1) as the cluster aims to deliver between 1550-2500 new dwellings, which will be of high density. Policy does not yet determine the range of tenures and size, so there is still some uncertainty. All sites within the cluster are located away from the Borough's Locally Important Geological Sites (LIGS) and all sites are located on previously developed land. This has resulted in a significant positive effect as it works towards the protection of soil and geological resources.

Policy aims to redevelop and integrate Leyton Temple Mills with the District Centre, as well as achieve improved sustainable transport nodes through improvements and/or creation of train stations. It has been assumed that these actions in combination will help to increase the vitality and viability of Leyton District Centre (SA18), and has therefore resulted in a significant positive effect.

Sites LE01, LE02 and GRG25 are amongst the 10% most deprived neighbourhoods in the country with regards to crime, whereas those to the north of the cluster are amongst the 30% most deprived neighbourhoods. Uncertainty has therefore been recorded with regards to crime (SA2), as it is unlikely that the allocation of these sites will affect crime, this could be more likely be affected by policy, such as in relation to design.

2.4.3 Mitigation & Enhancements

The following Mitigation has been identified:

- SA2: Include policy within the Local Plan to encourage reductions in crime through design of developments.
- SA3: Seek to increase in provision of healthcare facilities in order to reduce remand on existing facilities. Also, seek to increase recreational facilities to also alleviate healthcare demands as a result of physical and mental health benefits associated with access to green space and exercise.
- SA7 and SA9: Consider providing car charging points to improve the uptake up electric car usage. Consider limiting car parking provision in order to reduce risk of increasing air pollution.
- SA11: Site FRA required prior to development.
- SA13: Ecological assessment and mitigation need prior to development.
- SA14: AA of Local Plan required to assess effects on European sites and put forward avoidance / mitigation measures.
- SA17: Policy could require design to ensure that negative effects on nearby listed buildings and their settings are avoided.

No enhancement measures have been identified.

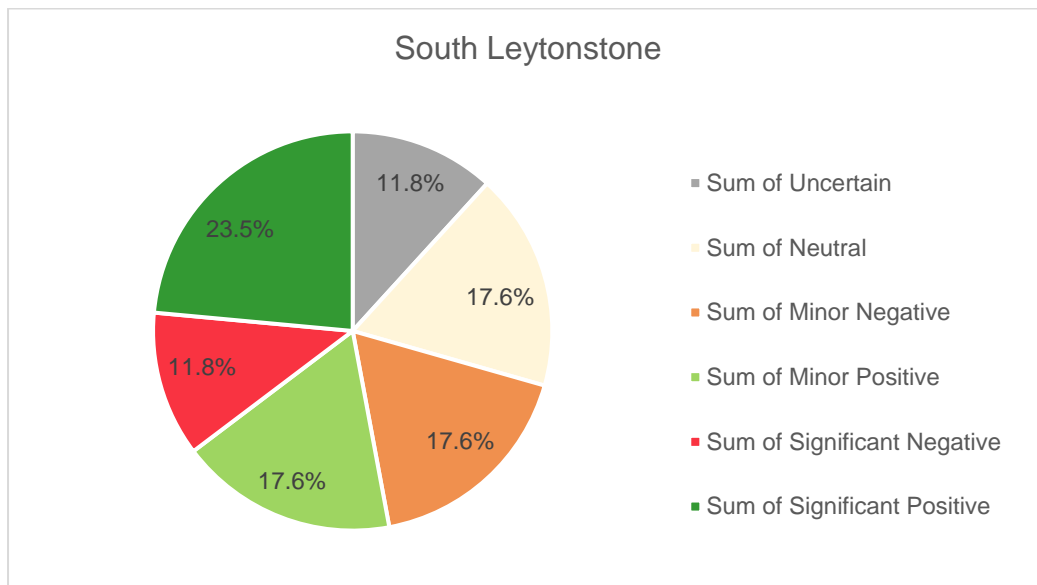
2.5 South Leytonstone

2.5.1 Proposed Policy Principles

The following proposed policy principles have been put forward:

- Explore opportunities for mixed use development, combining leisure and residential uses.
- Consider the designation of an additional Local Retail Parade.
- Public realm improvements at Harrow Green.
- Explore opportunities for estate regeneration/intensification at Sansom Road and Montague Road estates.
- High density living and intensification at identified locations/areas

2.5.2 Assessment



The assessment of South Leytonstone has resulted in significant negative effects with regards to air quality. Low PTAL scores suggest a lack of sufficient sustainable transport nodes. This will likely impinge on air quality with increased traffic occurring as a result of increased dwellings with poor public transport provision.

All sites within the cluster are less than 1km from a SSSI/SAC site. Development may therefore have negative effects upon this Natura 2000 site. The HRA screening exercise has identified likely significant effects on European sites associated with development in all parts of the borough. Therefore, a significant negative effect has been identified in relation to SA14.

Significant positive effects have been identified in relation to housing need (SA1) as the cluster aims to deliver between 700 – 1100 new dwellings, which will be of high density. Policy does not yet determine the range of tenures and size, so there is still some uncertainty. All sites within the cluster are located away from the Borough's Locally Important Geological Sites (LIGS) and all sites are located on previously developed land. This has resulted in a significant positive effect as it works towards the protection of soil and geological resources.

Further significant positive effects have been identified in relation to community cohesion (SA4). All of the sites have good access to educational, recreational and religious facilities. The vast majority of sites are situated 400 - 800m from a town, local, neighbourhood or District Centre, with over a third sharing a similar distance to a shopping frontage. Policy aims to designate an additional Local Retail Parade and this would also improve access to facilities..

All sites aside from CA47 are within close proximity to Borough Employment Areas. Development of these sites will maintain current levels of employment and businesses operating in the town, but when coupled with the proposal of an additional Local Retail Parade, will likely provide extra support for new job opportunities in the town. This has resulted in a significant positive effect on SA19 (Improve the local economy).

The cluster is deprived with regards to crime. It is unlikely that the allocation of these sites will affect crime, this is will more likely be affected by policy, such as in relation to design. Due to this, an uncertain effect has been recorded in relation to crime (SA2).

Aside from the northernmost sites, LEY04, CAH04, CAH48 and CAH49, all sites within the cluster are within 400m of a GPs. Improved or increased healthcare provisions are however not included in the proposed policy principles, suggesting that increased dwellings in the area will result in a direct increase in demand on existing healthcare facilities. However, health deprivation is low in the cluster. Due to this, an uncertain effect has been recorded.

2.5.3 Mitigation & Enhancements

The following mitigation has been identified:

- SA2: Include policy within the Local Plan to encourage reductions in crime through design of developments.
- SA7 and SA9: Consider providing car charging points to improve the uptake up electric car usage. Consider limiting car parking provision in order to reduce risk of increasing air pollution.
- SA14: AA of Local Plan required to assess effects on European sites and put forward avoidance / mitigation measures.
- SA17: Policy could require design to ensure that negative effects on nearby listed buildings and their settings are avoided.

No enhancement measures have been identified.

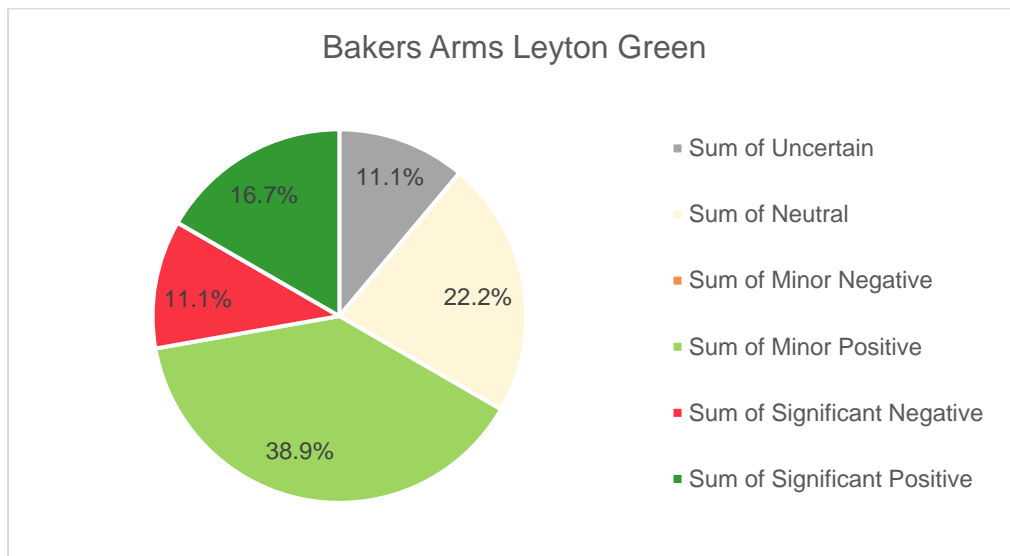
2.6 Bakers Arm/Leyton Green

2.6.1 Proposed Policy Principles

The following proposed policy principles have been put forward:

- Strengthen and support the retail offer in the District Centre
- Explore opportunities for mixed use on the TESCO site
- High density living and intensification at identified locations/areas
- Manage retail decline outside the designated centre boundary/elsewhere along Lea Bridge Road.
- Seek opportunities to enhance transport connectivity.

2.6.2 Assessment



The assessment of Bakers Arms/Leyton Green has resulted in significant negative effects in relation to the conservation and enhancement of the historic built environment (SA17). Sites LEB28 and LEB42, are located within the Bakers Arms Conservation area. These sites along with LEB08 and FOR01 are also located within 50m of a listed building. Development of these sites has potential to give rise to significant negative effects on setting and integrity of the conservation area, mitigation would therefore be required in order to avoid any negative effect.

All sites are located over 1km away from a SAC, SPA or SSSI. However, the HRA screening exercise has identified likely significant effects on European sites associated with development in all parts of the borough. Therefore, a significant negative effect has also been identified in relation to SA14.

Significant positive effects have been identified in relation to housing need (SA1) as the cluster aims to deliver between 900 – 1300 new dwellings, which will be of high density. Policy does not yet determine the range of tenures and size, so there is still some uncertainty. All sites within the cluster are located away from the Borough's Locally Important Geological Sites (LIGS) and all sites are located on previously developed land. This has resulted in a significant positive effect as it works towards the protection of soil and geological resources.

Despite lower PTAL scores for those sites in the south of the cluster (LE09, LE51 and LE37) all sites within the cluster have good access to sustainable transport. Policy aims to seek opportunities to enhance transport connectivity, which could help to reduce the need for private car usage. For this reason, a significant positive effect has been identified in relation to SA5 (improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system, reducing car use for all journey lengths).

The cluster is deprived with regards to crime. It is unlikely that the allocation of this site will affect crime, this is will more likely be affected by policy, such as in relation to design. Due to this, and uncertain effect has been recorded in relation to crime (SA2).

Uncertainty has also been recorded in relation to SA4 (community cohesion). Although, all sites within the cluster have good access to a wide range of community facilities the cluster is considered to be deprived with regards to barriers to housing and services. The addition of more homes may well help address the existing housing shortage but may not necessarily support community cohesion.

2.6.3 Mitigation & Enhancements

The following mitigation has been identified:

- SA2: Include policy within the Local Plan to encourage reductions in crime through design of developments.
- SA14: AA of Local Plan required to assess effects on European sites and put forward avoidance / mitigation measures.
- SA17: Development will need to be assessed for visual impact and designed well to avoid any negative effect on the conservation area, nearby historic assets and to enhance the area.

No enhancement measures have been identified.

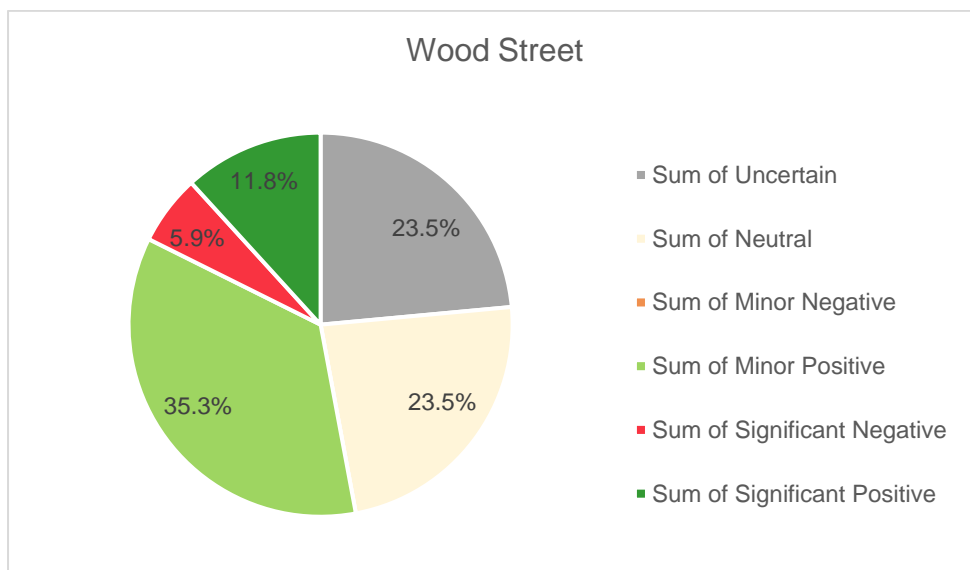
2.7 Wood Street

2.7.1 Proposed Policy Principles

The following proposed policy principles have been put forward:

- Town centre /public realm improvements
- Redevelopment of underused sites/areas for residential e.g. Travis Perkins
- Review of District centre boundary to strengthen it – more focussed /compact centre
- Manage retail decline outside the designated centre boundary/elsewhere along Wood Street
- Protect Wood Street Market
- Relocation of Wood Street Library to the town centre core area main and redevelopment of site for residential.
- High density living and intensification at identified locations/areas

2.7.2 Assessment



The assessment of Wood Street has resulted in a significant negative effect in relation to SA14 (protect the ecological integrity of SSSI and Natura 2000 sites). Sites WOS06 and WOS41 are located less than 400m away from Epping Forest SSSI/SAC. All other sites are less than 1km away. Ecological assessment and mitigation would be needed for potential impact on habitats and species within Epping Forest. The HRA screening exercise has also identified likely significant effects on European sites associated with development in all parts of the borough.

Significant positive effects have been identified in relation to housing need (SA1) as the cluster aims to deliver between 900 – 1100 new dwellings, which will be of high density. Policy does not yet determine the range of tenures and size, so there is still some uncertainty. All sites within the cluster are located away from the Borough's LIGS and all sites are located on previously developed land. This has resulted in a significant positive effect as it works towards the protection of soil and geological resources.

Uncertainties have been recorded with regards to the economy (SA19) and employment (SA20). All sites are located close to the District centre which may offer some employment opportunities. Sites WOS50, WOS07, WOS65, are located close to one of the Borough's key employment areas, however sites WOS28, WOS06, WOS56 and WOS41 are located beyond walking distance. Policy aims to manage retail decline outside the designated centre boundary and elsewhere along Wood Street. It is unclear on what this could entail, and whether it would result in growth for employment and the local economy.

The cluster is deprived with regards to crime. It is unlikely that the allocation of this site will affect crime, this is more likely to be affected by policy, such as in relation to design. Due to this, an uncertain effect has been recorded in relation to crime (SA2).

Uncertainty has also been recorded in relation to SA4 (community cohesion). Although all sites within the cluster have good access to a wide range of community facilities the cluster is considered to be deprived with regards to barriers to housing and services. The addition of more homes may well help address the existing housing shortage but may not necessarily support community cohesion.

2.7.3 Mitigation & Enhancements

The following mitigation has been identified:

- SA2: Include policy within the Local Plan to encourage reductions in crime through design of developments.
- SA4: Seek to improve access to community facilities / community centres.
- SA14: Ecological assessment likely to be required. AA of Local Plan required to assess effects on European sites and put forward avoidance / mitigation measures. The following enhancements have been suggested:
 - SA7: Consider providing car charging points to improve the uptake of electric car usage.

The following enhancement measures have been suggested:

- SA7 and SA9: Consider providing car charging points to improve the uptake of electric car usage and limit car parking in new developments.

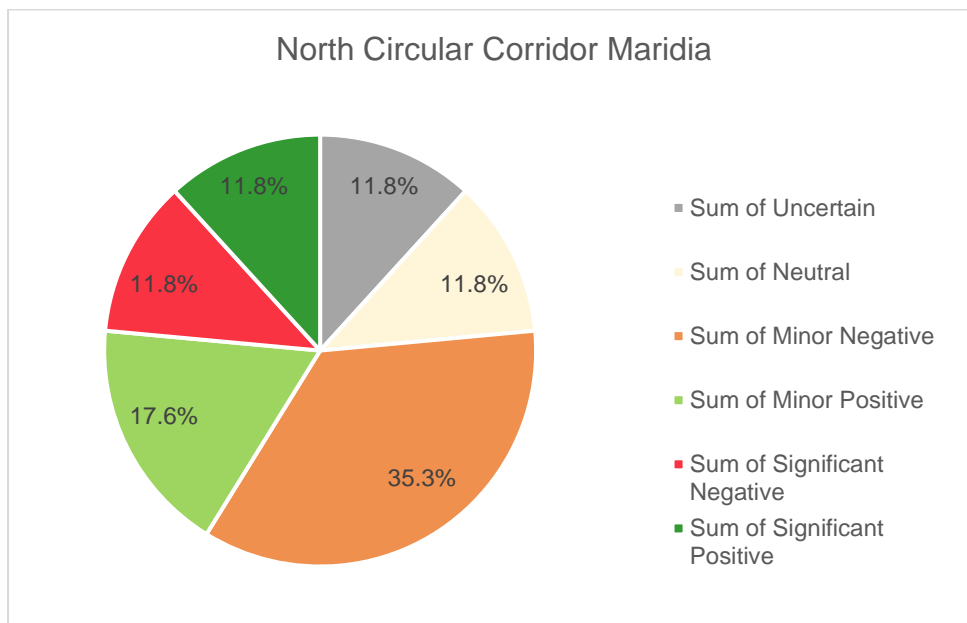
2.8 North Circular Corridor / Meridian Water Extension

2.8.1 Proposed Policy Principles

The following proposed policy principles have been put forward:

- Protect existing employment areas/ floorspace, particularly those designated SIL.
- Explore opportunities for co-location and intensification of existing employment uses.
- Explore opportunities for location of education uses - Blades Playing Field?
- Consider limited release of brownfield land in existing Green Belt - particularly Chingford Island/Reservoir Edge.
- Seek opportunities to enhance transport connectivity.

2.8.2 Assessment



Assessment of the North Circular Corridor / Meridian Water Extension Cluster has resulted in a significant negative effect with regards to flooding (SA11). With the exception of site HIH03, all proposed sites are at least partially within flood zone 3. VA01 is wholly in flood zone 3. A flood risk assessment will be required to determine suitability for development and mitigation required.

All sites are located less than 2km away from Walthamstow Reservoir SPA and/or Epping Forest SAC. Ecological assessment and mitigation would be needed for potential impact on habitats and species within Epping Forest and Walthamstow Reservoir. The HRA screening exercise has identified likely significant effects on European sites associated with

development in all parts of the borough. Therefore, a significant negative effect has been identified in relation to SA14.

Significant positive effects have been identified in relation to housing need (SA1) as the cluster aims to deliver between 1150 – 1800 new dwellings, which will be of high density. Policy does not yet determine the range of tenures and size, so there is still some uncertainty. All sites within the cluster are located away from the Borough's LIGS and all sites are located on previously developed land. This has resulted in a significant positive effect as it works towards the protection of soil and geological resources.

The cluster is located outside of any Town or District centre in the Borough, however, sites VA06, VA02 and VA04 are within walking distance Chingford Mount Road Neighbourhood Centre, which has a small retail parade. All sites have good access to both primary and secondary schools, but access to other facilities is lacking. The cluster is considered to be deprived with regards to barriers to housing and services. The addition of more homes may well help address the existing housing shortage but may not necessarily support community cohesion. For this reason uncertainty has been recorded in relation to community cohesion (SA4).

The cluster is deprived with regards to crime. It is unlikely that the allocation of this site will affect crime, this is will more likely be affected by policy, such as in relation to design. Due to this, and uncertain effect has been recorded in relation to crime (SA2).

An area of the south within site VA49 is in the Metropolitan Green Belt. The type of development is unknown and it is not known for certain that the quality of the green belt will be affected. Policy principles indicate that this could be brownfield land in the existing Green Belt, which could be released for development. The details of this development are unknown and therefore an uncertain effect has been recorded.

2.8.3 Mitigation & Enhancements

The following mitigation has been identified:

- SA2: Include policy within the Local Plan to encourage reductions in crime through design of developments.
- SA4: Seek opportunities to improve access to community facilities where some sites have poor access at present.
- SA11: Flood risk assessment required as a part of planning permission and mitigation put in place to manage drainage on site.
- SA13: Habitat surveys of deciduous woodland priority habitat and mitigation would be needed prior to development.
- SA14: AA of Local Plan required AA of Local Plan required to assess effects on European sites and put forward avoidance / mitigation measures.

- SA7 and SA9: Consider providing car charging points to improve the uptake up electric car usage. Consider limiting car parking provision in order to reduce risk of increasing air pollution.

Enhancement measures have not been identified.

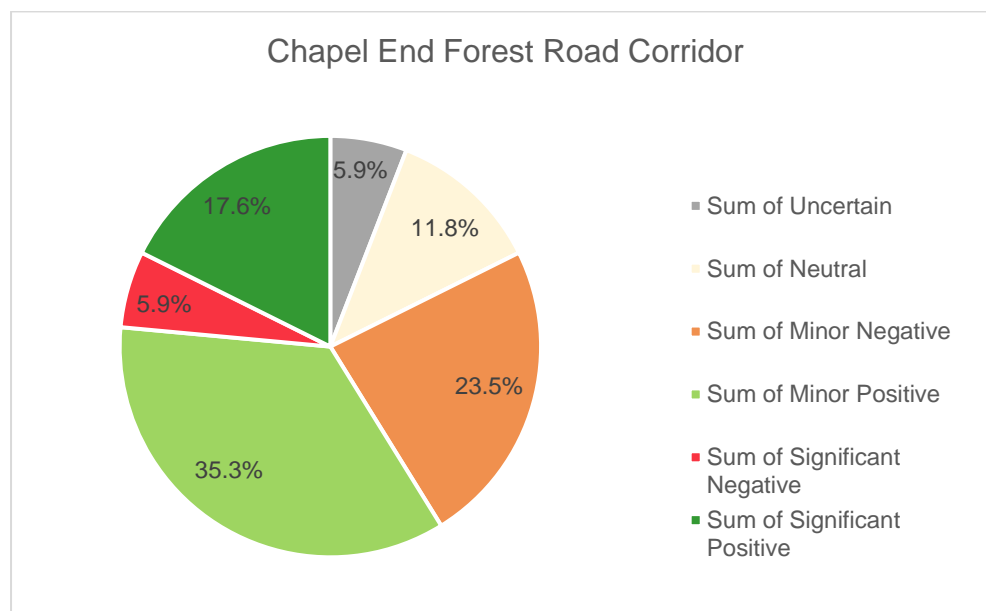
2.9 Chapel End/Forest Road Corridor

2.9.1 Proposed Policy Principles

The following Proposed Policy Principles have been put forward:

- Retention of existing civic functions and education use and how they could better integrate
- Mixed use residential/employment use with co-location of residential, industrial uses community/ social infrastructure, including protection of existing uses (YMCA)
- Enhancement of existing open space.
- Enhance retail offer across area including retention of existing Local Retail Parade (LRP) – possible designation of an additional LRP between Spruce Hills Road and Wood Street Corner to develop the existing retail offer.

2.9.2 Assessment



The assessment of Chapel End/Forest Road Corridor, has not identified any significant negative effects. Significant positive effects have been identified in relation to housing need (SA1) as the cluster aims to deliver between 600-900 new dwellings, which will be of high

density. Policy does not yet determine the range of tenures and size, so there is still some uncertainty. All sites within the cluster are located away from the Borough's LIGS and all sites are located on previously developed land. This has resulted in a significant positive effect as it works towards the protection of soil and geological resources.

All sites are located over 1km away from a SAC, SPA or SSSI, however, the HRA screening exercise has identified likely significant effects on European sites associated with development in all parts of the borough. The HRA screening exercise has also identified that development in this location could have potential to result in water pollution due to its close proximity to the SAC. Therefore, a significant negative cumulative effect in relation to SA14.

All sites within the cluster have good access to a number of community facilities. Policy aims to protect existing important community facilities as well as provide additional social infrastructure. This could help to build community cohesion, and therefore a significant positive effect has been identified in relation SA4.

The cluster is deprived with regards to crime. It is unlikely that the allocation of this site will affect crime, this is will more likely be affected by policy, such as in relation to design. Due to this, and uncertain effect has been recorded in relation to crime (SA2).

2.9.3 Mitigation & Enhancements

The following mitigation have been suggested:

- SA2: Include policy within the Local Plan to encourage reductions in crime through design of developments.
- SA14: AA of Local Plan required to assess effects on European sites and put forward avoidance / mitigation measures.
- SA7 and SA9: Consider providing car charging points to improve the uptake up electric car usage. Consider limiting car parking provision in order to reduce risk of increasing air pollution.

The following enhancement measures have been suggested:

- SA17: Policy could require design to ensure that avoiding negative effects on and enhancing the setting of the nearby listed buildings

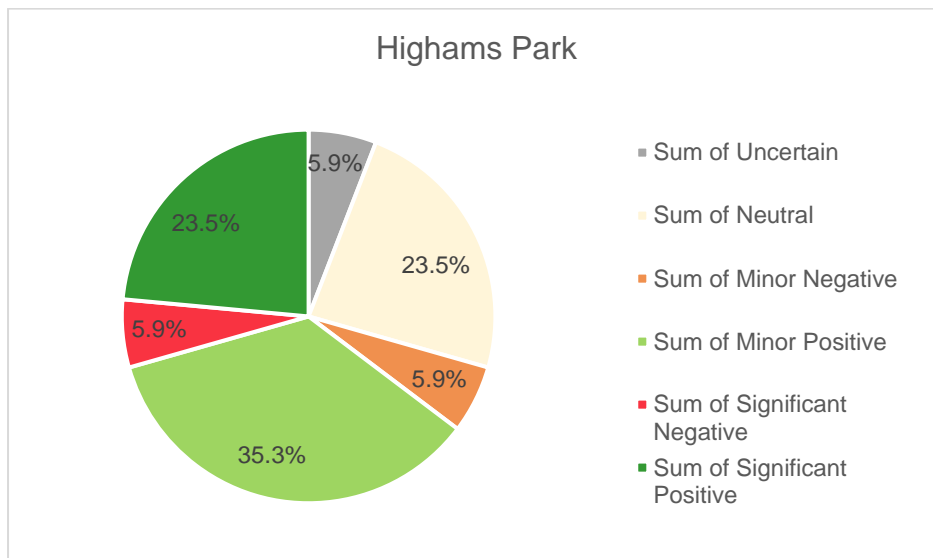
2.10 Highams Park

2.10.1 Proposed Policy Principles

The following Proposed Policy Principles have been put forward:

- Work with Highams Park Neighbourhood Planning Group on the development of a strategy for the area
- Explore opportunities for estate regeneration/intensification at Aldriche Way.
- Support the function of the District Centre and Borough Employment Area, and seek opportunities to better integrate these uses, whilst retain employment floorspace.
- Review retail frontage policy to encourage a mix of activity to improve the vitality and viability of the District Centre.
- Consider public realm improvements.
- Work with TfL to consider opportunities for improving connectivity and the potential for above-station redevelopment.

2.10.2 Assessment



The assessment of Highams Park Growth Hub, has identified a significant negative effect in relation to SA14 (Protect the ecological integrity of SSSI and Natura 2000 sites). All sites are located over 1km away from a SAC, SPA or SSSI, however, the HRA screening exercise has identified likely significant effects on European sites associated with development in all parts of the borough. The HRA screening exercise has also identified that development in

this location could have potential to result in water pollution due to its close proximity to the SAC.

Significant positive effects have been identified in relation to housing need (SA1) as the cluster aims to deliver between 400-550 new dwellings, which will be of high density. Policy does not yet determine the range of tenures and size, so there is still some uncertainty. All sites within the cluster are located away from the Borough's LIGS and all sites are located on previously developed land. This has resulted in a significant positive effect as it works towards the protection of soil and geological resources.

The Cluster is located within Highams Park District Centre, and all sites are within walking distance of the centre's facilities. It has therefore been assumed that all sites will help to support the district centre. Policies aims to encourage a mix of activity to improve the vitality and viability of the District Centre, which has resulted in a significant positive effect on SA18 (maintain and enhance the vitality and viability of the Borough's town centres).

Site HAE01 is located within a key Borough employment area, however, policy principles aim to support the function of the District Centre and Borough Employment Area, as well as retaining employment floorspace. It is assumed that this will be an employment site, which could therefore help to support jobs in the Borough. This has resulted in the assessment of a significant positive effect on SA20 (maintain levels of employment).

The cluster is deprived with regards to crime. It is unlikely that the allocation of this site will affect crime, this is will more likely be affected by policy, such as in relation to design. Due to this, and uncertain effect has been recorded in relation to crime (SA2).

The Cluster is considered to be deprived with regards to barriers to housing and services. The addition of more homes may well help address the existing housing shortage but may not necessarily support community cohesion. For this reason, uncertainty has been recorded in relation to community cohesion (SA4).

2.10.3 Mitigation & Enhancements

The following mitigation has been identified:

- SA2: Include policy within the Local Plan to encourage reductions in crime through design of developments.
- SA14: AA of Local Plan required to assess effects on European sites and put forward avoidance / mitigation measures.

The following enhancements have been suggested:

- SA5/SA9: Consider limiting car parking provision to one space per household in order to reduce risk of increasing air pollution.

- SA7: Consider providing car charging points to improve the uptake up electric car usage.
- SA17: Policy could require design to ensure that avoiding negative effects on and enhancing the setting of the nearby listed buildings

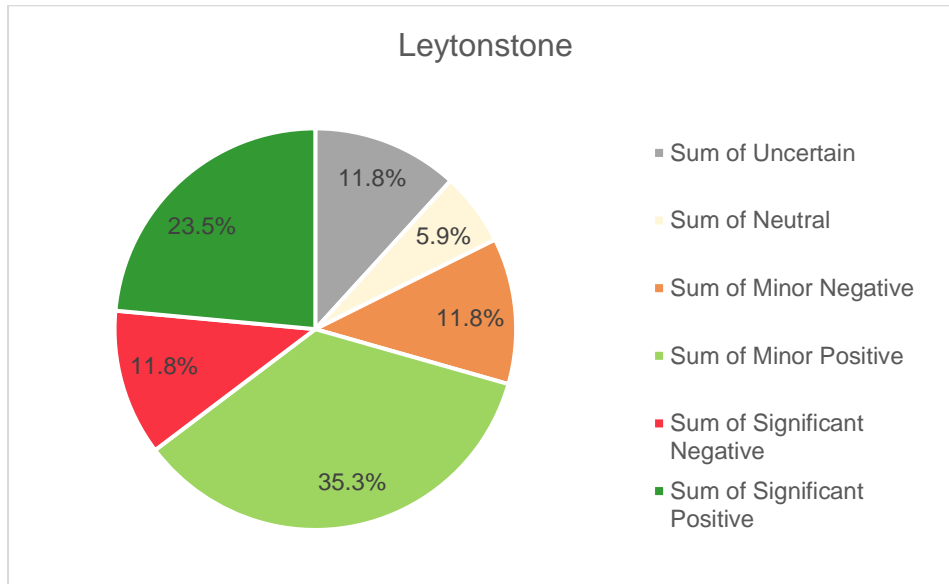
2.11 Leytonstone

2.11.1 Proposed Policy Principles

The following Proposed Policy Principles have been put forward:

- Strengthen and support the retail offer in the District Centre
- Explore opportunities for mixed use on the TESCO site
- Explore opportunities for reconfiguration of the highway
- Enhance access to neighbouring green space
- High density living and intensification at identified locations/areas

2.11.2 Assessment



The assessment of Leytonstone Growth Hub has resulted in a significant negative effect in relation to SA14 (protect the ecological integrity of SSSI and Natura 2000 sites). Whereas site LEY80 is located over 800m from a SSSI, all other sites within this proposed growth area are within 200-800m of the Epping Forest SSSI/SAC. The effects of development on Epping Forest may also lead to material damage to, or reduction in condition of, this ecological site of local importance. No provisions have been made for this in the Proposed Policy Principles.

The HRA screening exercise has identified likely significant effects on European sites associated with development in all parts of the borough. As well as Borough-wide potential cumulative effects relating for example to air quality and recreational pressure, the HRA screening exercise has also identified that development in this location could have potential to result in water pollution due to its close proximity to the SAC.

A significant negative effect has also been identified in relation to the conservation and enhancement of the historic built environment (SA17). Site LEY09 and LEY01 are within 50m of listed buildings. There is the potential for negative effects on these heritage assets, which may result in their loss, destruction or material damage. This extends to similar effects on their setting. A conservation area adjoins the Proposed Growth Area's north eastern boundary. Sites LEY01 and LEY08 are within 300m of a historic park or garden, the remaining sites within 1km. Again, development may impose adverse effects on this heritage asset.

Uncertainty has been recorded in relation to air quality (SA9). Proposed reconfiguration of the highway may alter air quality - the effects of this would depend on what the reconfiguration may entail, including whether sustainable transport modes are promoted.

Leytonstone Proposed Growth Area is amongst the 10% and 20% most deprived neighbourhoods in the country with regards to crime. None of the Proposed Policy Principles are likely to combat crime and the fear of crime, therefore uncertainty has been recorded within the assessment, with regards to SA2.

2.11.3 Mitigation & Enhancements

The following mitigation has been identified:

- SA13, SA14: Ecological assessment likely to be required. HRA screening required to identify potential for likely significant effects.
- SA17: Policy could require design to ensure that negative effects on nearby listed buildings and their settings are avoided.

The following enhancement measures have been suggested:

- SA7: Consider providing car charging points to improve the uptake up electric car usage.

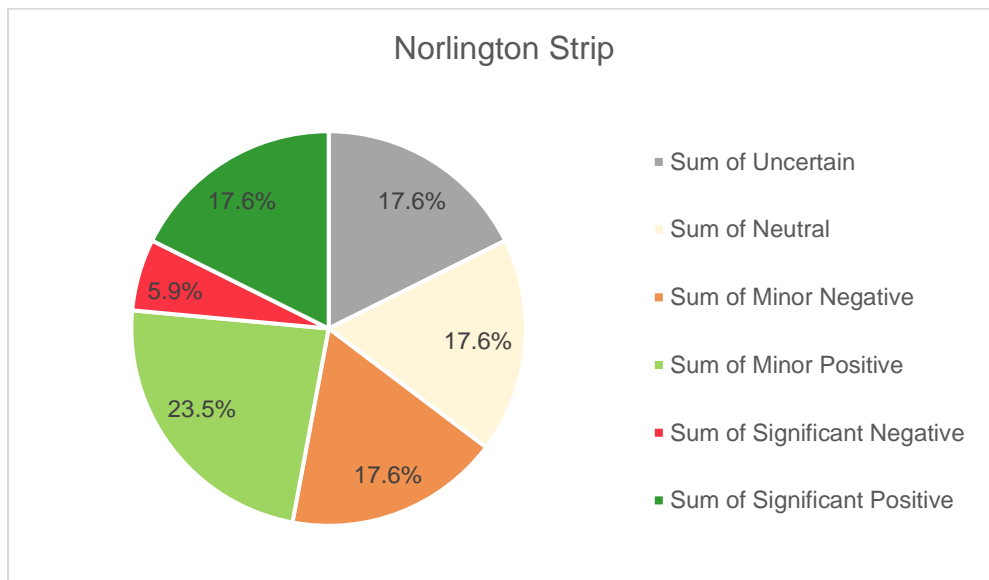
2.12 Norlington Strip

2.12.1 Proposed Policy Principles

The following Proposed Policy Principles have been put forward:

- Take forward/review Norlington Road SPD adopted 2016
- Improve quality of existing industrial
- Retain employment floorspace
- High density living and intensification at identified locations/areas

2.12.2 Assessment



The assessment of Norlington Strip has identified significant negative effects in relation SA14 (protect the ecological integrity of SSSI and Natura 2000 sites). None of the proposed study sites fall within close proximity to a SSSI, however they all fall within 1km of a Natura 2000 site. The HRA screening exercise has identified likely significant effects on European sites associated with development in all parts of the Borough.

Significant positive effects have been identified in relation to housing need (SA1) as the cluster aims to deliver between 250 – 400 new dwellings, which will be of high density. Policy does not yet determine the range of tenures and size, so there is still some uncertainty. All sites within the cluster are located away from the Borough's LIGS and all sites are located on previously developed land. This has resulted in a significant positive effect as it works towards the protection of soil and geological resources.

All sites fall within 800m of a Neighbourhood Centre and 400m of a Borough Employment Area. Development of the proposed study sites may therefore support new and existing job opportunities in the town, especially as current employment floorspace is to be retained as

detailed in the proposed policy principles. This has resulted in a significant positive effect on the economy (SA19).

All sites are within close proximity to healthcare services, however, due to the absence of proposed policy principles specifically concerning the provision of additional/improved healthcare facilities, it is not clear if existing facilities will meet residents' needs. Sites GRG01 and FOR46 are within 400m of recreational facilities whereas sites LEY05 and GRG26 are between 400m and 800m from recreational facilities. None of the proposed policy principles are likely to specifically address this. Neither increased healthcare nor recreational facilities are likely to be afforded through the taking forward/review of Norlington Road SPD. An uncertain effect has therefore been recorded in regard to health and wellbeing (SA3).

All sites within the cluster are within close proximity to Borough Employment Areas, bus stops and a train station (Leyton Midland Road Overground station). Despite this, the PTAL score for each of the sites is 3-4. Whilst not addressed in detail in the Norlington Road SPD, improvements to transport may be required by Section 106 agreements, which may take into account the provision of improved/increased public transport. As this is not known for certain, an uncertain effect has been identified in relation to SA5 (improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system, reducing car use for all journey lengths).

The Cluster is within the 30 and 40% most deprived neighbourhoods in the country with regards to crime. The Norlington Road SPD encourages increased natural surveillance, in particular at the junction of Hainault Road and Norlington Road. The taking forward/review of the SPD as included in the proposed policy principles has the potential to reduce crime and the fear of crime in this area. However, this is not known for certain and therefore an uncertain effect has therefore been recorded.

2.12.3 Mitigation & Enhancements

Mitigation has not been identified, however, the following enhancement measures have been suggested:

- SA2: Include policy within the Local Plan to encourage reductions in crime through design of developments.
- SA4: Seek to improve access to community centres and other facilities.
- SA7 and SA9: Consider providing car charging points to improve the uptake up electric car usage. Consider limiting car parking provision in order to reduce risk of increasing air pollution.
- SA14: AA of Local Plan required to assess effects on European sites and put forward avoidance / mitigation measures.

- SA18: Limited mitigation available to help support town centres. Ensure uses in this area do not compete with town centre uses.

Enhancement measures have not been identified.

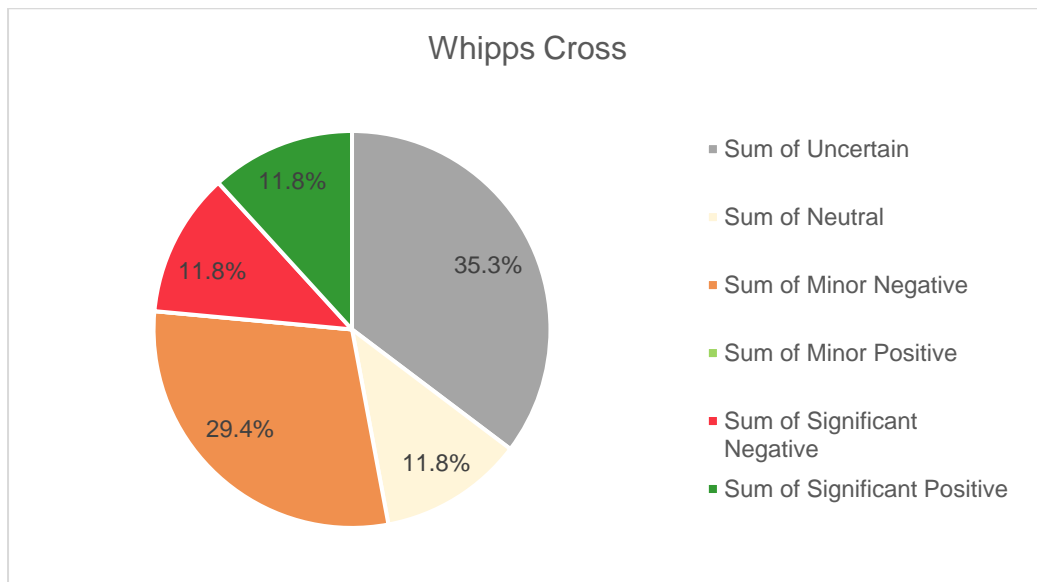
2.13 Whipps Cross

2.13.1 Proposed Policy Principles

The following Proposed Policy Principles have been put forward:

- Emerging proposals from Barts Health NHS Trust
- Co-located hospital with residential/mixed uses to include retail of appropriate scale and function
- Provision of new legible open space
- Explore opportunities for the minor release of nearby greenbelt land to support Hospital redevelopment.
- High density living and intensification at opportunity sites – derelict sites
- Provision of better access/connectivity with surrounding areas

2.13.2 Assessment



The assessment of Whipps Cross has identified a significant negative effect in relation to the maintenance and enhancement of the quality of the green belt and open space areas (SA15). The cluster boundary overlaps with the Metropolitan Green Belt. Policy aims to explore opportunities for the minor release of nearby greenbelt land to support the hospital

redevelopment. This works negatively against this objective and will be likely to result in the loss of green belt land.

Further significant negative effects have been identified in relation to SA14 (protect the ecological integrity of SSSI and Natura 2000 sites). The cluster is located less than 400m away from Epping Forest SSSI/SAC. Ecological assessment and mitigation would be needed for potential impact on habitats and species within Epping Forest SSSI/SAC. The HRA screening exercise has also identified likely significant effects on European sites associated with development in all parts of the Borough. The HRA screening exercise has also identified that development in this location could have potential to result in water pollution due to its close proximity to the SAC.

The cluster is located well away from local facilities and employment areas, and has poor transport links. Policy aims to provide better access and connectivity with the surrounding areas. It is unclear on what this would entail, and whether it would reduce the need for car use. This has therefore resulted in uncertain effects on air quality (SA9), reduction in greenhouse gas emissions (SA7) and improvement in opportunities for access to local services (SA5).

The cluster is deprived with regards to crime. It is unlikely that the allocation of this site will affect crime, this is will more likely be affected by policy, such as in relation to design. Due to this, and uncertain effect has been recorded in relation to crime (SA2).

The cluster has good access to schools, recreational facilities and places of worship, however due to its remote location, it has poor access from other facilities such as shops and community centres. Policy aims to co-locate the hospital with residential and mixed uses such as retail. It is not clear if any hospital/healthcare or community facilities will be lost as a result of development. For this reason, an uncertain effect has been identified with regards to SA3 (health and wellbeing) and SA4 (Improve community cohesion and reduce inequalities through the provision of community facilities).

2.13.3 Mitigation & Enhancements

The following mitigation measures have been identified:

- SA2: Include policy within the Local Plan to encourage reductions in crime through design of developments.
- SA14: AA of Local Plan required to assess effects on European sites and put forward avoidance / mitigation measures.
- SA15: Development of the Green Belt will need to undergo review and the Council will need to demonstrate that it is for exceptional circumstances. Landscape mitigation measures would be needed to minimise the impact on the Green Belt ensuring not compromise the land's main contribution to the Green Belt purposes.

- SA17: Policy could require design to ensure that avoiding negative effects on and enhancing the setting of the nearby listed buildings
- SA19 and SA20: Seek to provide opportunities for employment development within this area.

The following enhancements have been suggested:

- SA7: Consider providing car charging points to improve the uptake up electric car usage.
- SA9: Consider limiting car parking provision to one space per household in order to reduce risk of increasing air pollution.
- SA13: Development could incorporate the landscape planting, living walls and roofs, bird and bat boxes etc. in order to provide a net gain in biodiversity.
- SA15: The incorporation of trees and hedgerows within the development could help maintain the natural capital value of the Green Belt.

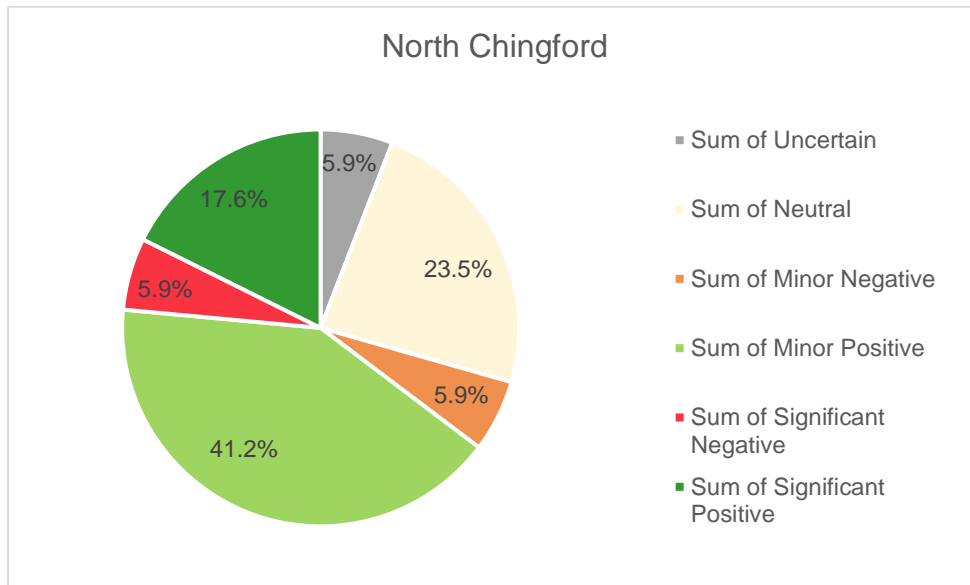
2.14 North Chingford

2.14.1 Proposed Policy Principles

The following Proposed Policy Principles have been put forward:

- Work with TfL to consider opportunities for improving connectivity and the potential for residential use on the station site
- Consider airspace development opportunities along Station Road
- Review opportunities for development of underutilised backland areas and car parks
- High density living/intensification around Chingford Station
- Review retail frontage policy
- Encourage a diversity of use (present predominance of restaurants)

2.14.2 Assessment



The assessment of North Chingford has identified significant negative effects in relation SA14 (protect the ecological integrity of SSSI and Natura 2000 sites). None of the proposed study sites fall within close proximity to a SSSI, however they all fall within 1km of a Natura 2000 site. The HRA screening exercise has identified likely significant effects on European sites associated with development in all parts of the Borough.

Significant positive effects have been identified in relation to housing need (SA1) as the cluster aims to deliver between 200 – 400 new dwellings, which will be of high density. Policy does not yet determine the range of tenures and size, so there is still some uncertainty. All sites within the cluster are located away from the Borough's LIGS and all sites are located on previously developed land. This has resulted in a significant positive effect as it works towards the protection of soil and geological resources.

Further significant positive effects have been identified in relation to SA5 (improve opportunities for access to local services). The Cluster has good transport links, with Chingford railway station within walking distance of all sites, as well as being located within the Chingford District centre. Proposed policy principle aims to work with TfL to consider opportunities for improving connectivity, but it is unclear as to whether this will result in an increase in sustainable transport. Site CHG28 is located on the Chingford railway station and bus station site. Planning principles state the intended use of airspace developments and the use of underutilised backland areas and car parks. It is assumed that development of this site will not result in a negative impact on the bus or rail station.

The cluster is deprived with regards to crime. It is unlikely that the allocation of this site will affect crime, this is more likely to be affected by policy, such as in relation to design. Due to this, an uncertain effect has been recorded in relation to crime (SA2).

2.14.3 Mitigation & Enhancements

The following mitigation measures have been identified:

- SA2: Include policy within the Local Plan to encourage reductions in crime through design of developments.
- SA13, SA14: Ecological assessment likely to be required. AA of Local Plan required to assess effects on European sites and put forward avoidance / mitigation measures.
- SA17: Archaeological assessment and mitigation required prior to development.

The following enhancements have been suggested:

- SA7 and SA9: Consider providing car charging points to improve the uptake up electric car usage.
- SA17: Policy could require design to ensure that avoiding negative effects on and enhancing the setting of the nearby listed buildings are specifically addressed within the development.

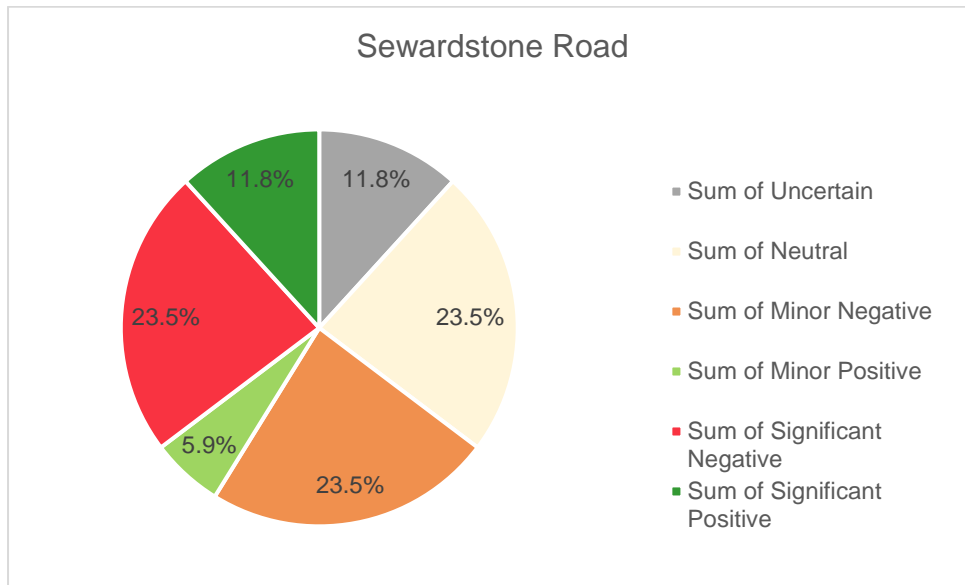
2.15 Sewardstone Road

2.15.1 Proposed Policy Principles

The following Proposed Policy Principles have been put forward:

- Long term development potential linked to Crossrail 2 proposals in Enfield.
- Gateway location to the Borough – for promotion and local distinctiveness
- High density living and intensification at identified locations/areas
- New mixed use residential - maximising height opportunities on Motorpoint site
- Complementary uses to support existing neighbourhood centre - retail/small scale town centre type and commercial uses
- Public transport improvements such as extension of bus network linked with Crossrail 2 station in Enfield. Area currently has a very low PTAL.
- Opportunities to release existing Green Belt brownfield land for residential development.

2.15.2 Assessment



The assessment of Sewardstone Road has resulted in significant negative effects in relation to SA5 (improve opportunities for access to local services). The Cluster has just one site, which is served by a number of bus stops, but is over 2km away from the nearest train station in Chingford. PTAL scores are low (1a/1b) indicating that access to public transport is poor. Development of this site could result in further car usage. The cluster is right on the Borough boundary and residents could be more inclined to use facilities in neighbouring Enfield.

Policy principles aim to improve public transport options such as extension of bus network linked with Crossrail 2 station in Enfield. However, development of Crossrail 2 is still in planning phases with no known completion date. It is uncertain that this development will gain benefits from this in the short term. This has also resulted in the assessment of significant negative effects on air quality (SA9).

The cluster is located within close proximity to Epping Forest SAC and SSSI and Chingford Reservoir SSSI. Ecological assessment and mitigation would be needed for potential impact on habitats and species within Epping Forest and Chingford Reservoir. The HRA screening exercise has identified likely significant effects on European sites associated with development in all parts of the Borough. For this reason, a significant negative effect has been identified in relation to SA14 (protect the ecological integrity of SSSI and Natura 2000 sites).

Significant positive effects have been identified in relation to housing need (SA1) as the cluster aims to deliver between 200 – 400 new dwellings, which will be of high density. Policy does not yet determine the range of tenures and size, so there is still some uncertainty. All sites within the cluster are located away from the Borough's LIGS and all sites are located on previously developed land. This has resulted in a significant positive effect as it works towards the protection of soil and geological resources.

The Site is located within the Sewardstone Road Neighbourhood Centre which has a small parade of shops. The nearest primary school is located within walking distance (1km - 12mins walk) and the nearest secondary school is 1.2km (14mins walk) away. Policy principles aim to provide complementary uses to support existing neighbourhood centre, which could be beneficial. However, the Cluster is considered to be deprived with regards to barriers to housing. The addition of more homes may well help the barriers to existing housing shortage but may not necessarily support community cohesion. For this reason an uncertain effect has been recorded.

The northern part of the cluster is amongst the top 20% most deprived neighbourhoods in the country with regards to crime, whereas the south is amongst the 50% most deprived neighbourhoods in the country. Due to this north-south split, uncertainty has been recorded. It is assumed that allocation of this site will not affect crime, and is more likely to be affected by policy, such as in relation to design.

2.15.3 Mitigation & Enhancements

The following mitigation measures have been identified:

- SA2: Include policy within the Local Plan to encourage reductions in crime through design of developments.
- SA5: Consider limiting car parking provision to one space per household in order to reduce car usage and the risk of increasing air pollution. Uptake of public transport usage should be encouraged through increased services.
- SA14: AA of Local Plan required AA of Local Plan required to assess effects on European sites and put forward avoidance / mitigation measures.
- SA19 and SA20: Seek to provide employment developments / opportunities in this area.

The following enhancements have been suggested:

- SA7 and SA9: Consider providing car charging points and limiting car parking in new developments.
- SA12: Flood risk assessment may be required to identify the potential longer term impacts of fluvial flooding as well as other sources such as surface water and reservoir flooding.

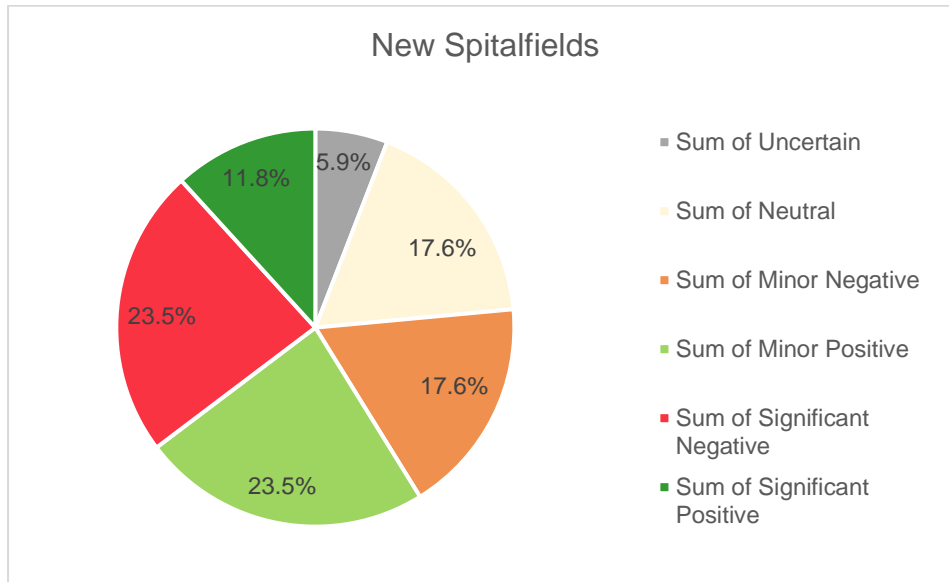
2.16 New Spitalfields

2.16.1 Proposed Policy Principles

The following Proposed Policy Principles have been put forward:

- Long term opportunity
- Retain existing employment floorspace and consider mixed use including residential development subject to masterplan/ employment strategy

2.16.2 Assessment



The assessment of New Spitalfields has identified significant negative effects in relation SA14 (protect the ecological integrity of SSSI and Natura 2000 sites). None of the proposed study sites fall within close proximity to a SSSI, however they all fall within 1km of a Natura 2000 site. The HRA screening exercise has identified likely significant effects on European sites associated with development in all parts of the Borough.

The site is located in a Borough Employment Area, and is adjacent to others, however, its public transport links are relatively poor, with the closest train/tube and bus facilities more than 800m and 400m respectively from the site location. This is reflected in the low PTAL scores of 0 - 2. Planning policies do not aim to improve opportunities for access to local services, and therefore a significant negative effect has been identified in relation to SA5. Due to the poor access to public transport, it has been assumed that development of this site could increase reliance on private cars and therefore increase greenhouse gas emissions and reduce overall air quality. For these reasons, further significant negative effects have been identified in relation to SA7 (reduce greenhouse gases) and SA9 (improve air quality).

Significant positive effects have been identified in relation to housing need (SA1) as the cluster aims to deliver between 100-150 new dwellings, which will be of high density. Policy does not yet determine the range of tenures and size, so there is still some uncertainty. All sites within the cluster are located away from the Borough's LIGS and all sites are located on previously developed land. This has resulted in a significant positive effect as it works towards the protection of soil and geological resources.

New Spitalfields falls within the 30% most deprived neighbourhoods in the country with regards to crime. The allocation of this site will be unlikely to affect crime - this will more likely be affected by policy, such as in relation to design. For this reason an uncertain effect has been recorded.

2.16.3 Mitigation & Enhancements

- The following mitigation has been identified:
- SA2: Include policy within the Local Plan to encourage reductions in crime through design of developments.
- SA14: AA of Local Plan required to assess effects on European sites and put forward avoidance / mitigation measures.
- SA5, SA7, SA9: Consider limiting car parking provision to one space per household in order to reduce risk of increasing air pollution. Uptake of public transport usage could be encouraged through increased services.

No enhancement measures have been suggested.

2.17 Potential Cumulative Effects of the New Spatial Strategy

The following potential cumulative effects have been identified in the assessments of the growth clusters:

2.17.1 Stewardstone Road

Potential negative cumulative effects have been identified in relation to SA7 (greenhouse gases) and SA9 (air quality). The site is located outside of the Borough's main employment areas and town/district centres. The site is served by a number of bus stops (Routes 215, 313, 385 and 505), but is over 2km away from the nearest train station in Chingford. PTAL scores are low (1a/1b) indicating that access to public transport is poor. Development of this site could result in further car usage, which could contribute to a further decline in air quality and increase in carbon emissions. The cluster is on the Borough boundary and residents could be more inclined to use facilities in neighbouring Enfield. Policy principles aim to improve public transport options such as extension of bus network linked with Crossrail 2 station in Enfield. However, development of Crossrail 2 is still in planning phases with no known completion date.

Policy principles which could enhance the neighbourhood centre as well as provide better transport links (in combination with Crossrail 2) could be beneficial in the longer term, with regards to reducing levels of air pollution and reducing potential cumulative negative effects across the borough.

2.17.2 Blackhorse Lane

Potential negative cumulative effects have been identified in relation to SA7 (carbon emissions) and SA9 (air quality). Some sites within the cluster have poor access to facilities and sustainable transport modes. It is assumed that development within this growth cluster could result in increased car usage, resulting in a decline in localised air pollution and increasing greenhouse gas emissions from transport.

2.17.3 Chapel End Forest Road Corridor

Potential negative cumulative effects have been identified in relation to SA7 (carbon emissions) and SA9 (air quality). All sites within this growth cluster have good access to bus stops (Routes 123, 275, 212 and W16), however, access to rail and tube stations is poor, which is reflected in poor PTAL scores. Development within this cluster could result in further car usage, and therefore contribute to an increase in greenhouse gas emissions and air pollution. The policy principles for this area do not include measures to improve sustainable transport links, but do aim to enhance the retail offer within the cluster. This could help to reduce the need to travel further for retail and improve air quality at a local level.

2.17.4 Whipps Cross

Uncertain potential cumulative effects have been identified for this area in relation to SA7 (carbon emissions) and SA9 (air quality). The area is located well away from local facilities

and employment areas, and has poor transport links, however, policy principles aim to provide better access and connectivity with the surrounding area. It is unclear what this would entail and whether it would be sustainable. It is not clear that this would reduce the need for car use, and associated air pollution and reduce greenhouse gas emissions. An uncertain effect is therefore identified which could potentially be a minor cumulative negative effect if car use were not reduced or even increased as a result of development.

North Circular Corridor / Meridian Water Extension

Potential negative cumulative effects have been identified in relation to SA7 (carbon emissions) and SA9 (air quality). PTAL scores are low (ranging from 0-3) indicating that access to public transport in this area is poor. Angel Road in Enfield is the closest train station for sites VA01, VA21 and VA49. Development of this site could result in further car usage and therefore contribute to an increase in greenhouse gas emissions and air pollution. Policy principles aim to seek opportunities to enhance transport connectivity, which could provide greater access in this area, but it is not clear as to whether this will be focusing on sustainable transport modes.

2.17.5 South Leytonstone

Potential negative cumulative effects have been identified in relation to SA7 (carbon emissions) and SA9 (air quality). All sites are within close proximity to Borough Employment Areas, train/tube stations and bus stops. The only exception to this is site CA47 which falls more than 400m from a Borough Employment Area. The PTAL scores for the cluster are, however, generally low and are unlikely to be ameliorated by the proposed policy principles. The low PTAL scores suggest that sustainable transport access is slightly lacking and therefore car use could increase with development in this area. A minor negative effect is identified in relation to SA7 (carbon emissions) and SA9 (air quality) which could result in a cumulative negative effect across the borough when combined with other potential negative effects on these SA objectives.

2.17.6 Lea Bridge Corridor

The policy principles for this area should help to improve access to facilities and employment etc in this area by improving provision rather than aiming to improve sustainable transport services / access. The assessment against SA9 (air quality) identifies a potential minor negative effect because some of the potential development sites have low PTAL scores. There is therefore a risk that car use could increase with development in this area, increasing air pollution which could combine with other potential increases in air pollution from development elsewhere in the Borough.

2.17.7 New Spitalfields

Potential negative cumulative effects have been identified in relation to SA7 (greenhouse gases) and SA9 (air quality). Access to public transport in this area is low, which is reflected in low PTAL scores. Development of this site could increase reliance on private cars and

therefore increase greenhouse gas emissions and contribute to existing air quality problems in the borough. This could also contribute to a negative cumulative effect across the borough.

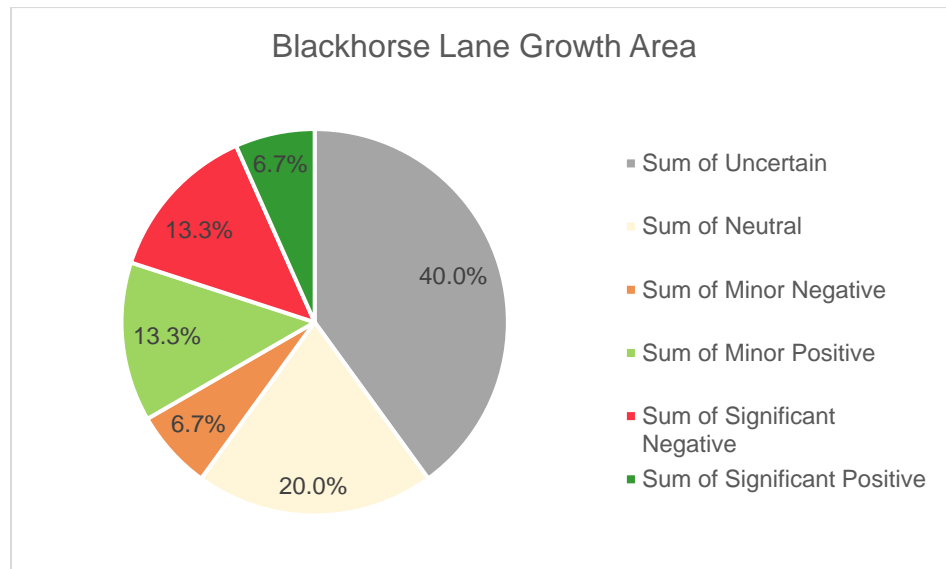
In addition to the effects identified above, the potential effects of all of the growth clusters in the New Spatial Strategy have been considered together and a number of additional potential cumulative effects have been identified, as follows:

- SA15 (green belt and open space): The New Spatial Strategy includes some small changes to the green belt boundary at Lea Bridge Corridor, Leytonstone and Whipps Cross. This erosion of green belt land could potentially result in a cumulative negative effect in relation to SA15 in the south eastern part of the Borough; and
- SA17 (historic environment): A number of the assessments of growth clusters within the central southern part of the Borough have identified potential negative effects on historic buildings. Mitigation will need to be put in place in order to avoid the loss of historic assets, a decline in local distinctiveness and in order to avoid cumulative negative effects in relation to these SA objectives in this part of the Borough.

3 Performance of the Existing Spatial Strategy Option

3.1 Blackhorse Lane Growth Area

3.1.1 Assessment



The assessment of the Blackhorse Lane Growth Area has resulted in significant negative effects in relation to flooding (SA11). Site HIH47 is partially located within flood zone 3 and 2, whilst site WIM21 is partially located within flood zone 2. A flood risk assessment will be required to determine suitability for development and mitigation required.

A significant negative effect has also been identified in relation to SA14 (Protect the ecological integrity of SSSI and Natura 2000 sites). With the exception of site HIH42, all sites with the Growth Area are located less than 400m away from Lee Valley SPA. Ecological assessment and mitigation would be needed for potential impact on habitats and species within Lee Valley SPA and Walthamstow Reservoir SSSI.

With the exception of site HIH42, all sites with the Growth Area are located less than 400m away from Lee Valley SPA. Ecological assessment and mitigation would be needed for potential impact on habitats and species within Lee Valley SPA and Walthamstow Reservoir SSSI. The HRA screening exercise has identified likely significant effects on European sites associated with development in all parts of the Borough.

The Growth Area is located away from Walthamstow town centre and the Borough's district centres, however sites HIH06, WIM21, HIS33 and HIS35 in the south of the Growth Area, are located within 400m of Blackhorse Lane Neighbourhood centre, which has a small parade of shops and facilities. Sites in the north of the Growth Area have better access to schools, than those in the south. The Growth Area is considered to be deprived with regards to barriers to housing. The addition of more homes may well help the barriers to existing housing shortage but may not necessarily support community cohesion. For this reason, an uncertain effect has been recorded in relation to SA4 (improve community cohesion).

There is a lack of healthcare facilities within the Growth Area, however, there is a good provision of recreational facilities, with good access to footpaths around Walthamstow reservoirs, Higham Hill Park as well as Lee Valley Park (Douglas Eyre Playing Fields). It is not clear as to whether development will result in improved or increased healthcare provisions, suggesting that increased dwellings in the area will result in a direct increase of demand on existing healthcare facilities. However, deprivation with regards to health and disability is low within the Growth Area. An uncertain effect has therefore been recorded with regards to health and wellbeing (SA3).

Parts of the Growth area are amongst the 10% most deprived neighbourhoods in the country, with regards to crime. It is unlikely that the allocation of this site will affect crime, and therefore an uncertain effect has been identified in relation to SA2.

Sites HIS33 have the highest PTAL score, with good access to Blackhorse Lane underground station as well as numerous bus routes. Sites HIH06, WIM31 and HIS35 also have good access to sustainable transport, but have lower PTAL scores. Sites in the north of the cluster have poorer access to public transport. Development of these sites could result in further car usage. Due to this north-south divide, an uncertain effect has been recorded, in relation to SA5 (improve opportunities for access to local services, facilities and employment).

It is assumed that development will result in some housing, but the numbers are not clear, and therefore, an uncertain effect has been identified in relation to SA1. The Growth Area is considered to be deprived with regards to barriers to housing. The addition of more homes may well help the barriers to existing housing shortage but may not necessarily support community cohesion. For this reason, a further uncertain effect has been identified in relation to SA4 (improve community cohesion).

Sites in the north of the cluster have poorer access to public transport. Development of these sites could result in further car usage and increase greenhouse gas emissions. However, sites in the south benefit from better transport links. It is therefore uncertain what the overall outcome of directing growth to this area and the potential development sites would be, with regards to both SA7 (reduce greenhouse gases) and SA9 (improve air quality).

3.1.2 Mitigation & Enhancements

The following mitigation has been identified:

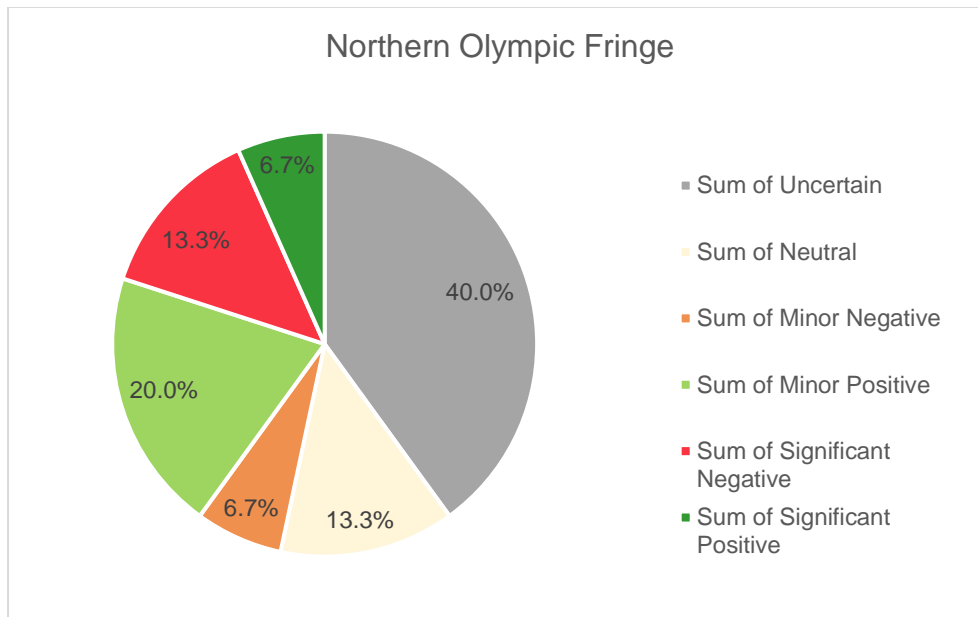
- SA2: Include policy within the Local Plan to encourage reductions in crime through design of developments.
- SA7 and SA9: Consider providing car charging points to improve the uptake up electric car usage. Consider limiting car parking provision in order to reduce risk of increasing air pollution.
- SA11: Flood risk assessment required as a part of planning permission and mitigation put in place to manage drainage on site.
- SA14: Ecological assessment and mitigation required for potential effects on the deciduous woodland habitat as well as the sensitive habitats within Lee Valley SSSI

and Walthamstow Reservoir SSSI. AA of Local Plan required to assess effects on European sites and put forward avoidance / mitigation measures.

No enhancements have been identified.

3.2 Northern Olympic Fringe Growth Area

3.2.1 Assessment



The assessment of the Northern Olympic Fringe Growth Area has resulted in a significant negative effect on flooding. Sites LEB35, LEB06, LEB38, LEB12, LEB05, LEB53, LEB07 are all located within flood zone 3, with additional sites are located within flood zone 2. A flood risk assessment will be required to determine suitability for development and mitigation required.

A significant negative effect has been identified in relation to SA14. Some sites in the west of the Growth Area are located less than 800m away from Walthamstow Marshes SSSI. Ecological assessment may be required in order to address any potential impact on habitats and species within the SSSI. The HRA screening exercise has identified likely significant effects on European sites associated with development in all parts of the borough. Therefore a significant negative cumulative effect is identified with regards to this objective and the Local Plan will be subject to appropriate assessment in order to assess the potential effects and identify avoidance measures / mitigation.

All sites within the cluster are located away from the Borough's LIGS and all sites are located on previously developed land. This has resulted in a significant positive effect as it works towards the protection of soil and geological resources (SA12).

It is assumed that development will result in some housing, but the numbers are not clear, and therefore, an uncertain effect has been identified in relation to SA1.

Health deprivation in the Growth Area is low, and all sites have healthcare facilities within walking distance (<800m). Sites LEB10, LEB07, LEB27, LE01 and LE02 have poor access to recreational facilities. Development of these sites may require the provision of open space and further recreational facilities in order to prevent a decline in health and wellbeing. Due to a lack of a good offering of both recreational and healthcare facilities at all sites in the Growth Area, an uncertain effect has been identified, with regards to SA3.

Sites in the east of the Growth Area have are well connected to Leyton and benefit from the facilities within the District Centre. Sites in the west of the Growth area however, are not as well connected and significantly lower PTAL scores. It is not clear if development of all these sites will improve opportunities for access to local services, and therefore an uncertain effect has been identified in relation to SA5. Due to the differences in connectivity and access to facilities, and uncertain effect has also been identified with regards to the reduction of greenhouse gases (SA7) and air quality (SA9).

Sites in the south are well located to Leyton and development of these sites may help support the district centre. Sites further towards the west are located further away from a town or district centre and may not necessarily support the vitality or viability of the Borough's town centres. Due to this divide, an uncertain effect has been recorded with regards to SA18.

3.2.2 Mitigation & Enhancements

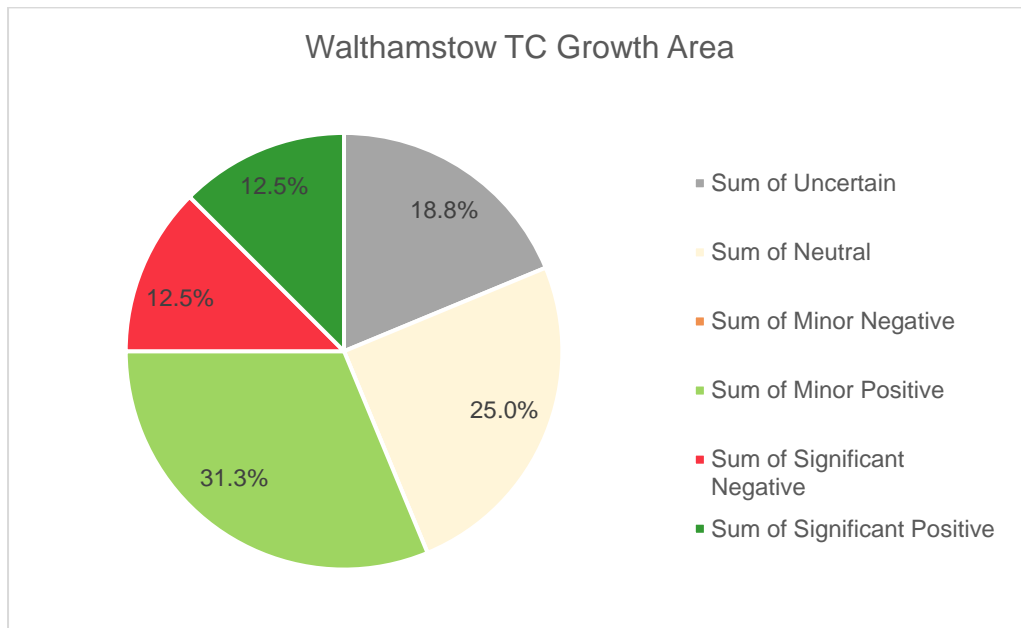
The following mitigation measures have been identified:

- SA2: Include policy within the Local Plan to encourage reductions in crime through design of developments.
- SA3: Seek improvements to recreational facilities in this area.
- SA5: Seek improvements to public transport.
- SA7 and SA9: Consider providing car charging points to improve the uptake up electric car usage. Consider limiting car parking provision in order to reduce risk of increasing air pollution.
- SA11: Flood risk assessment required as a part of planning permission and mitigation put in place to manage drainage on site.
- SA14: AA of Local Plan required to assess effects on European sites and put forward avoidance / mitigation measures.

No enhancements have been suggested.

3.3 Walthamstow Town Centre Growth Area

3.3.1 Assessment



The assessment of Walthamstow Town Centre Growth Area has resulted in a significant negative effect on the conservation and enhancement of the historic built environment (SA17). Sites HIS44, HIS09, HIS14 are all located within the Walthamstow St James Conservation Area, whilst site HIS08 is located adjacent to the conservation area. Development of these sites has potential to give rise to significant negative effects on heritage assets, which could result in their loss, destruction or material damage. Mitigation would be required in order to avoid negative effect on conservation area and/or listed buildings and scheduled monuments in close proximity to the proposed sites.

Further significant negative effects have been identified in relation to SA14. All sites within the Growth Area are located over 1km away from a SAC, SPA or SSSI. However, the HRA screening exercise has identified likely significant effects on European sites associated with development in all parts of the borough.

All sites within the cluster are located away from the Borough's LIGS and all sites are located on previously developed land. This has resulted in a significant positive effect as it works towards the protection of soil and geological resources.

It is assumed that development will result in some housing, but the numbers are not clear, and therefore, an uncertain effect has been identified in relation to SA1. The cluster is considered to be deprived with regards to barriers to housing. The addition of more homes may well help the barriers to existing housing shortage but may not necessarily support community cohesion. For this reason an uncertain effect has been identified in relation to SA4 (improve community cohesion).

All sites in the Growth Area are located within walking distance (<800m) of healthcare facilities, however the cluster has less recreational offering. Sites MA37, MA38, MA06 and HIS44 are

all located more than walking distance away from any recreation facilities. Due to a lack of a good offering of both recreational and healthcare facilities at all sites in the Growth Area, an uncertain effect has been identified. If similar policy principles were put forward for Walthamstow town centre as in the preferred spatial strategy, leisure facilities could be improved which would benefit health and wellbeing of residents. However, this is not known for certain and therefore an uncertain effect has been recorded in relation to SA3.

All sites in the Growth Area fall amongst the top 10% of most deprived neighbourhoods in the country, in regards to crime. It is unlikely that the allocation of this site will affect crime, and therefore an uncertain effect has been identified.

With the exception of recreational facilities, the Growth Area has good access to a number of community facilities, however, the Growth Area is considered to be deprived with regards to barriers to housing. The addition of more homes may well help address the existing housing shortage but may not necessarily support community cohesion.

3.3.2 Mitigation & Enhancements

The following mitigation measures have been identified:

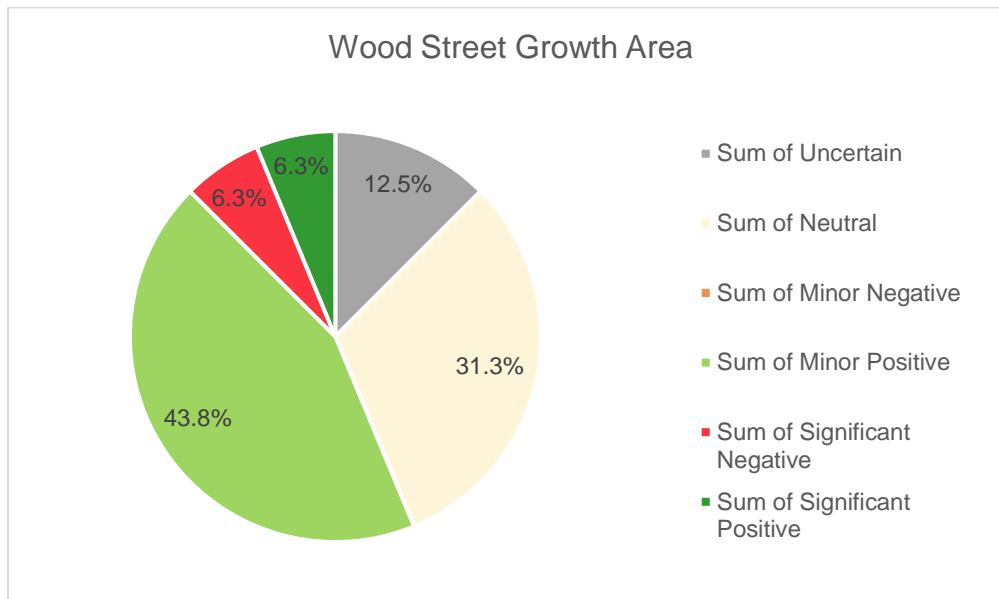
- SA2: Include policy within the Local Plan to encourage reductions in crime through design of developments.
- SA3: Seek to improve access to / provision of recreational and healthcare facilities within this area.
- SA14: AA of Local Plan required to assess effects on European sites and put forward avoidance / mitigation measures.
- SA17: Development will need to be assessed for visual impact and designed well to avoid any negative effect on the conservation area, nearby historic assets and to enhance the area.

The following enhancements have been suggested:

- SA7: Consider providing car charging points to improve the uptake up electric car usage.

3.4 Wood Street Growth Area

3.4.1 Assessment



The assessment of Wood Street Growth Area has resulted in significant negative effects on SA14 (protect the ecological integrity of SSSI and Natura 2000 sites). Sites WOS06 and WOS41 are located less than 400m away from Epping Forest SSSI/SAC. All other sites are less than 1km away. Ecological assessment and mitigation would be needed for potential impact on habitats and species within Epping Forest SAC. The HRA screening exercise has identified likely significant effects on European sites associated with development in all parts of the Borough. The HRA screening exercise has also identified that development in this location could have potential to result in water pollution due to its close proximity to the SAC.

All sites are located close to the District centre which may offer some employment opportunities. Sites in the north of the Growth Area are close to the Clifford Road employment areas. It is assumed that sites located near to this employment will help to support it. Some sites in the south of the Growth Area however, are located beyond walking distance of this employment area. Due to this north-south divide an uncertain effect has been identified.

All sites in the Growth Area fall amongst the top 10% of most deprived neighbourhoods in the country, in regards to crime. It is unlikely that the allocation of this site will affect crime, and therefore an uncertain effect has been identified. It is assumed that development will result in some housing, but the numbers are not clear. For this reason an uncertain effect has been identified in relation to SA1(housing needs).

3.4.2 Mitigation & Enhancements

The following mitigation has been identified:

- SA2: Include policy within the Local Plan to encourage reductions in crime through design of developments.

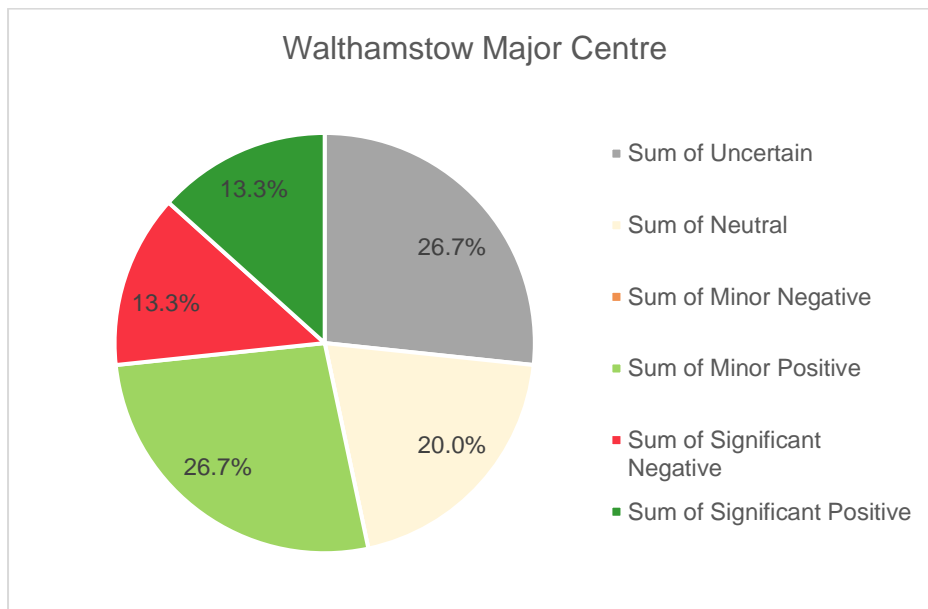
- SA14: AA of Local Plan required to assess effects on European sites and put forward avoidance / mitigation measures.
- SA19: Seek to provide employment development within the area alongside residential.

The following enhancements have been suggested:

- SA7: Consider providing car charging points to improve the uptake up electric car usage.

3.5 Walthamstow Major Centre

3.5.1 Assessment



The assessment of Walthamstow Major Centre has resulted in significant negative effects in relation to the Conservation and enhancement of the historic built environment (SA17). Sites HIS44, HIS09, HIS14 are all located within the Walthamstow St James Conservation Area, whilst site HIS08 is located adjacent to the conservation area. Development of these sites has potential to give rise to significant negative effects on heritage assets, which could result in their loss, destruction or material damage. Mitigation would be required in order to avoid negative effects on the conservation area and/or listed buildings and scheduled monuments in close proximity to the proposed sites.

All sites within the town centre are located over 1km away from a SAC, SPA or SSSI. However, the HRA screening exercise has identified likely significant effects on European sites associated with development in all parts of the borough. Therefore, a significant negative effect has been identified in relation to SA14.

The town centre has good access to sustainable transport links, particularly rail services, as both Walthamstow Central (Victoria and Overground services) and St James St (Overground

services) stations are located within the cluster. PTAL scores are also high (4-6B). For this reason, a significant positive effect has been identified in relation to SA5 (Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system).

All sites within the town centre are located well away from the Borough's LIGS and all sites are located on previously developed land. This works towards protection of soil and geological resources, and has therefore resulted in a significant positive effect on SA12.

It is assumed that development will result in some housing, but the numbers aren't known. For this reason an uncertain effect has been identified in relation to SA1. The town centre is considered to be deprived with regards to barriers to housing. The addition of more homes may well help the address the existing housing shortage but may not necessarily support community cohesion, therefore, a uncertain effect has been recorded with regards to SA4 (improve community cohesion).

All sites in the town centre are located within walking distance (<800m) of healthcare facilities, however, the cluster has less recreational offering. Sites MA37, MA38 and MA06 are all located more than walking distance away from any recreation facilities. Due to this difference, an uncertain effect has been recorded, with regards to SA3.

All sites in the Growth Area fall amongst the top 10% of most deprived neighbourhoods in the country, with regards to crime. It is unlikely that the allocation of this site will affect crime, and therefore an uncertain effect has been identified.

3.5.2 Mitigation & Enhancements

The following mitigation measures have been identified:

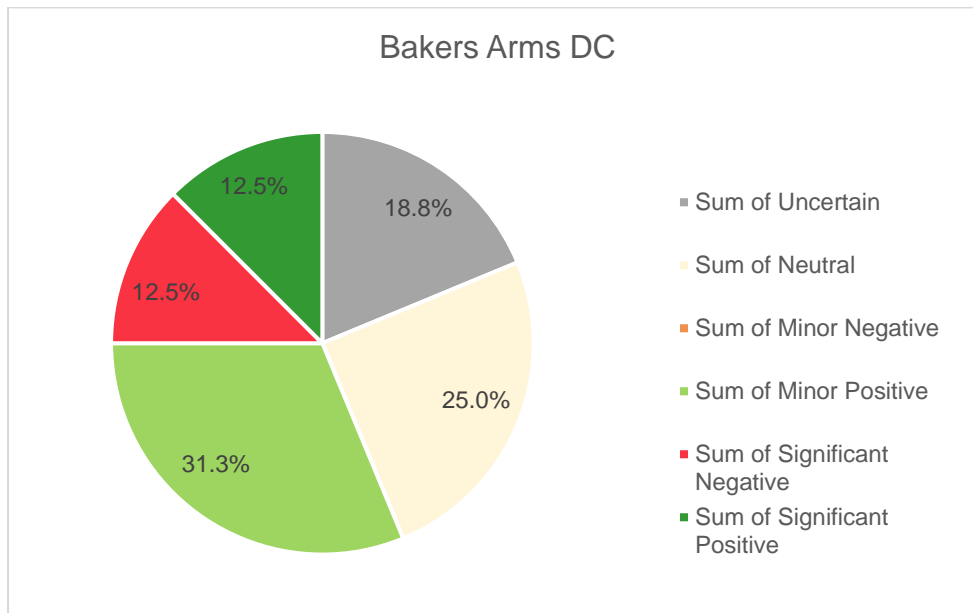
- SA2: Include policy within the Local Plan to encourage reductions in crime through design of developments.
- SA3 and SA4: Seek improvements to recreational facilities within this area.
- SA14: AA of Local Plan required to assess effects on European sites and put forward avoidance / mitigation measures.
- SA17: Development will need to be assessed for visual impact and designed well to avoid any negative effect on the conservation area, nearby historic assets and to enhance the area.

The following enhancements have been suggested:

- SA7: Consider providing car charging points to improve the uptake up electric car usage.

3.6 Bakers Arms District Centre

3.6.1 Assessment



The assessment of Bakers Arms District Centre has resulted in a significant negative effect on the conservation and enhancement of the historic environment (SA17). Site LEB28 is located within the Bakers Arms Conservation area as well as being less than 50m away from a listed building. Mitigation would be required to avoid negative effect on conservation area.

All sites within the town centre are located over 1km away from a SAC, SPA or SSSI. However, the HRA screening exercise has identified likely significant effects on European sites associated with development in all parts of the borough. Therefore a significant negative effect has been identified in relation to SA14.

All sites within the District Centre have good public transport links, and high PTAL scores. The District Centre has a number of facilities within walking distance, including the Dunton Road employment area. For this reason, significant positive effects have been identified in relation to SA5 (Improve opportunities for access to local services, facilities and employment).

All sites within the District Centre are located well away from the Borough's LIGS and all sites are located on previously developed land. This works towards protection of soil and geological resources, and has therefore resulted in a significant positive effect on SA12.

All sites are located within walking distance of the Dunton Road employment site. Development of these sites could help to support the employment area, but it is not clear if this will help to maintain stable levels of employment across the Borough. This has resulted in an uncertain effect on SA20.

It is assumed that development will result in some housing, but the numbers aren't known. For this reason an uncertain effect has been identified in relation to SA1. The District Centre is considered to be deprived with regards to barriers to housing. The addition of more homes may well help address the existing housing shortage but may not necessarily support

community cohesion, therefore, a uncertain effect has been recorded with regards to SA4 (improve community cohesion).

The majority of the sites within the District Centre fall amongst the top 10% of most deprived neighbourhoods in the country, with regards to crime. It is unlikely that the allocation of this site will affect crime, and therefore an uncertain effect has been identified.

3.6.2 Mitigation & Enhancements

The following mitigation measures have been identified:

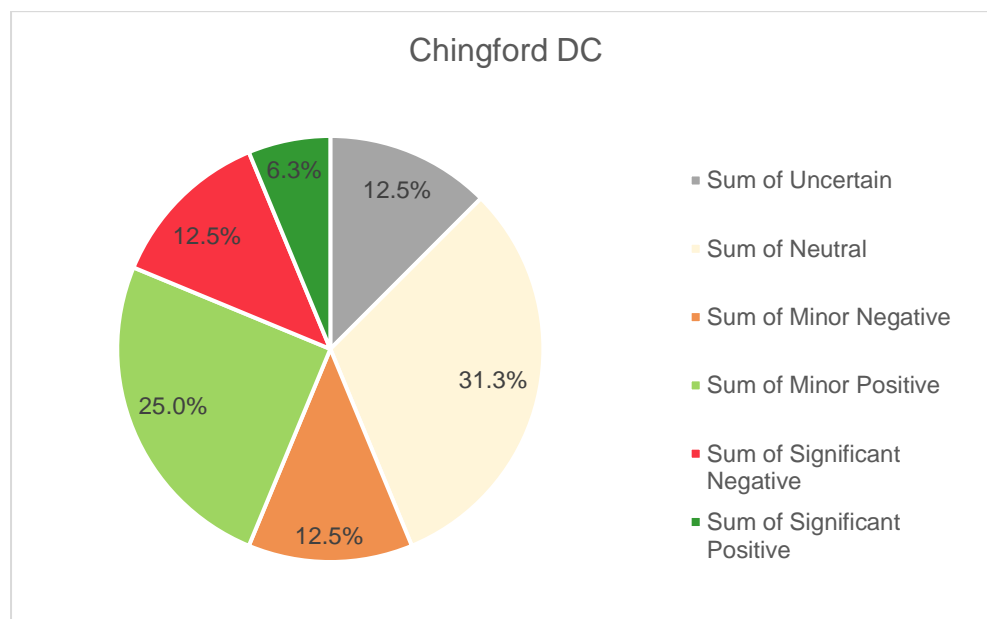
- SA2: Include policy within the Local Plan to encourage reductions in crime through design of developments.
- SA14: AA of Local Plan required to assess effects on European sites and put forward avoidance / mitigation measures.
- SA17: Development will need to be assessed for visual impact and designed well to avoid any negative effect on the conservation area, nearby historic assets and to enhance the area.

The following enhancements have been suggested:

- SA17: Policy could require design to ensure that avoiding negative effects on and enhancing the setting of the nearby listed buildings are specifically addressed within the development.

3.7 Chingford District Centre

3.7.1 Assessment



The assessment of Chingford District Centre has resulted in a significant negative effect on the conservation and enhancement of the historic environment (SA17). Sites CHG60 and CHG61 are located within and CHG62 is located adjacent to the Chingford Green conservation area. All other sites in the north of the cluster are located a suitable distance away from the conservation area and any listed buildings. Mitigation would be needed to limit the potential negative effects on the conservation area and any listed buildings.

The District Centre is located within close proximity to Epping Forest SAC and SSSI. Sites CHG65, CHG64 and CHG28 are located within 200m of Epping Forest. Ecological assessment and mitigation would be needed for potential impact on habitats and species within Epping Forest. The HRA screening exercise has identified likely significant effects on European sites associated with development in all parts of the borough. The HRA screening exercise has also identified that development in this location could have potential to result in water pollution due to its close proximity to the SAC.

Significant positive effects have been identified in relation to SA12 (ensure the efficient use of land and buildings and protect soil quality and geological resources). The District Centre is located well away from the Borough's LIGS and all sites are located on previously developed land, which works towards protection of soil and geological resources.

It is assumed that development will result in some housing, but the numbers aren't known. For this reason an uncertain effect has been identified in relation SA1.

The majority of the sites within the District Centre fall amongst the top 20% of most deprived neighbourhoods in the country, with regards to crime. It is unlikely that the allocation of this site will affect crime, and therefore an uncertain effect has been identified, with regards to crime (SA2).

3.7.2 Mitigation & Enhancements

The following mitigation has been put forward:

- SA2: Include policy within the Local Plan to encourage reductions in crime through design of developments.
- SA14: AA of Local Plan required to assess effects on European sites and put forward avoidance / mitigation measures.
- SA17: Archaeological assessment and mitigation required prior to development.
- SA19 and SA20: Seek to provide employment developments / opportunities in this area.

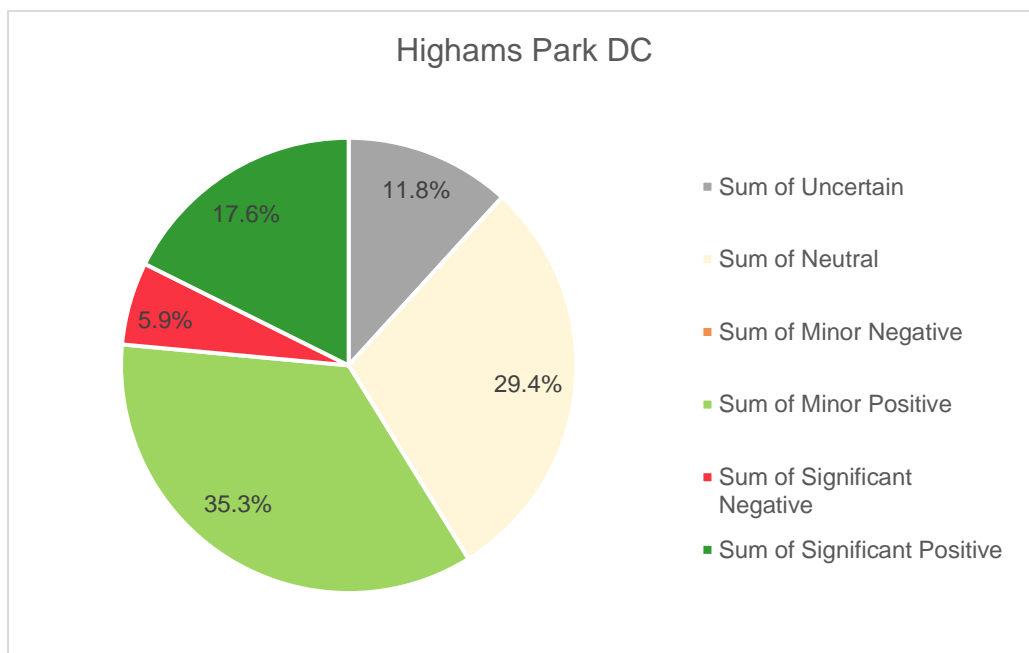
The following enhancements measures have been suggested:

- SA7: Consider providing car charging points to improve the uptake up electric car usage.

- SA17: Policy could require design to ensure that avoiding negative effects on and enhancing the setting of the nearby listed buildings are specifically addressed within the development.

3.8 Highams Park District Centre

3.8.1 Assessment



The assessment of Highams Park District Centre has resulted in a significant negative effect on SA14 (protect the ecological integrity of SSSI and Natura 2000 sites). All sites are located over 1km away from Epping Forest SSSI/SAC. However, the HRA screening exercise has identified likely significant effects on European sites associated with development in all parts of the Borough. The HRA screening exercise has also identified that development in this location could have potential to result in water pollution due to its close proximity to the SAC.

Due to the good offering of transport links, employment areas, facilities and services within the District centre, significant positive effects have been identified in relation to SA19 (improve the local economy by enabling employment developments in appropriate places) and SA18 (maintain and enhance the vitality and viability of the Borough's town centres). It is thought that the development of these sites will help to support the District centre and its employment area.

Significant positive effects have been identified in relation to SA12 (ensure the efficient use of land and buildings and protect soil quality and geological resources). The District Centre is located well away from the Borough's LIGS and all sites are located on previously developed land, which works towards protection of soil and geological resources.

It is assumed that development will result in some housing, but the numbers aren't known. For this reason an uncertain effect has been identified in relation SA1.

The northern part of the District centre is considered to be amongst the top 20% most deprived neighbourhoods in the country, whilst the southern part is amongst the top 30% most deprived neighbourhoods in the country, in relation to crime. It is unlikely that the allocation of this site will affect crime, this is more likely to be affected by policy, such as in relation to design. For this reason an uncertain effect has been identified, with regards to SA2.

3.8.2 Mitigation & Enhancements

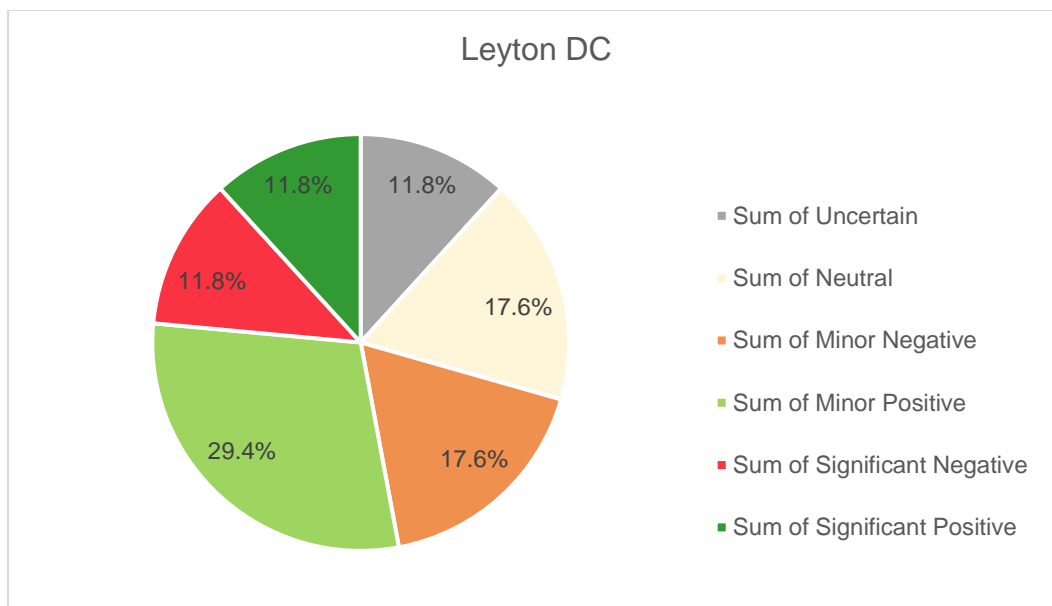
The following mitigation has been identified:

- SA2: Include policy within the Local Plan to encourage reductions in crime through design of developments.
- SA14: AA of Local Plan required to assess effects on European sites and put forward avoidance / mitigation measures.

No enhancement measures have been identified.

3.9 Leyton District Centre

3.9.1 Assessment



The assessment of Leyton District Centre has resulted in a significant negative effect on health and wellbeing (SA3). Although health deprivation is currently low, the District Centre has poor access to both healthcare and recreational facilities. It is assumed that development here could put more people at a disadvantage.

None of the sites within this cluster are within the specified 800m or 2km to a SSSI nor a Natura 2000 site respectively. However, the HRA screening exercise has identified likely significant effects on European sites associated with development in all parts of the Borough.

Therefore a significant negative effect is identified with regards to SA14 (protect the ecological integrity of SSSI and Natura 2000 sites)

The District Centre has a number of facilities within walking distance, therefore, it is assumed that all sites will support the district centre and help to maintain its viability. For this reason, a significant positive effect has been identified in relation to SA18 (maintain and enhance the vitality and viability of the Borough's town centres). Significant positive effects have been identified in relation to SA12 (ensure the efficient use of land and buildings and protect soil quality and geological resources). The District Centre is located well away from the Borough's LIGS and all sites are located on previously developed land, which works towards protection of soil and geological resources.

It is assumed that development will result in some housing, but the numbers aren't known. For this reason an uncertain effect has been identified in relation SA1.

The District Centre is considered to be amongst the top 10% most deprived neighbourhoods in the country, with regards to crime. It is unlikely that the allocation of this site will affect crime, this is will more likely be affected by policy, such as in relation to design. For this reason an uncertain effect has been identified, with regards to SA2.

3.9.2 Mitigation & Enhancements

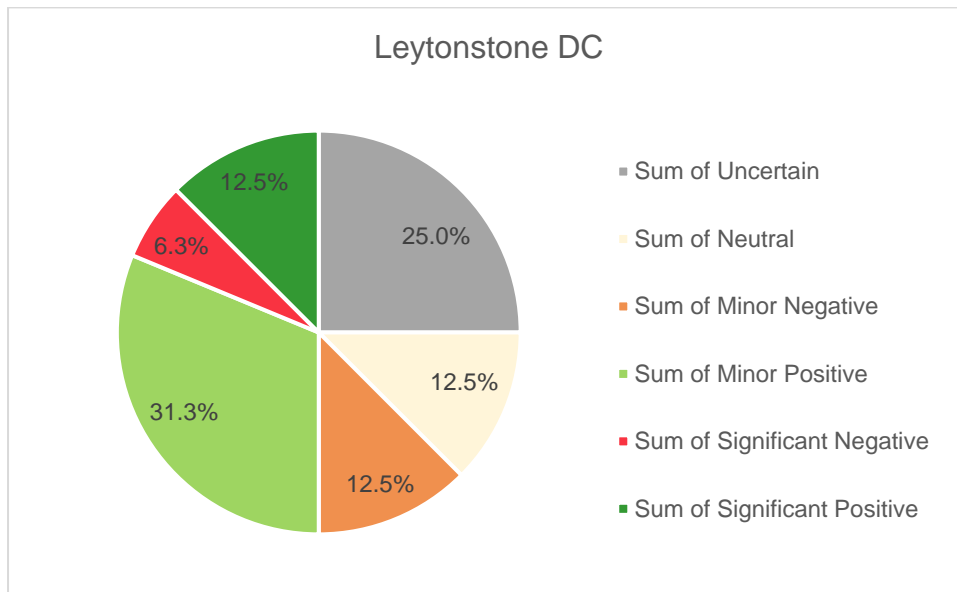
The following mitigation has been identified:

- SA2: Include policy within the Local Plan to encourage reductions in crime through design of developments.
- SA3: Seek increase in provision of healthcare facilities in order to reduce demand on existing facilities. Also seek increased recreational facilities to alleviate healthcare demands as a result of physical and mental health benefits associated with access to green space and exercise.
- SA4: seek increased access to community facilities.
- SA11: A flood risk assessment may be required in order to determine the significant effects.
- SA13: Policy could require development to provide a net gain in biodiversity through the provision of open space, garden/landscape planting, bird and bat boxes etc.
- SA14: AA of Local Plan required to assess effects on European sites and put forward avoidance / mitigation measures.

Enhancement measures have not been identified.

3.10 Leytonstone

3.10.1 Assessment



The assessment of Leytonstone District Centre has resulted in significant negative effects with regards to the historic environment (SA17). Sites LEY08 and LEY01 are located less than 100m away from the Browning Road Conservation Area, whilst sites LEY09 and LEY01 are also located less than 50m away from a listed building/scheduled monument. Mitigation would be required to avoid negative effect on conservation area.

Sites LEY08 and LEY01 are located less than 400m from Epping Forest SAC/SSSI. Ecological assessment and mitigation would be needed for potential impact on habitats and species within Epping Forest. The HRA screening exercise has identified likely significant effects on European sites associated with development in all parts of the Borough. The HRA screening exercise has also identified that development in this location could have potential to result in water pollution due to its close proximity to the SAC.

The District Centre has a number of facilities within walking distance, therefore, it is assumed that all sites will support the district centre and help to maintain its viability. For this reason, a significant positive effect has been identified in relation to SA18 (maintain and enhance the vitality and viability of the Borough's town centres). Significant positive effects have been identified in relation to SA12 (ensure the efficient use of land and buildings and protect soil quality and geological resources). The District Centre is located well away from the Borough's LIGS and all sites are located on previously developed land, which works towards protection of soil and geological resources.

It is assumed that development will result in some housing, but the numbers aren't known. For this reason an uncertain effect has been identified in relation SA1.

The north eastern part of the District centre is considered to be amongst the top 10% most deprived neighbourhoods in the country, whilst the south western part is amongst the top 20% most deprived neighbourhoods in the country, with regards to crime. It is unlikely that the allocation of this site will affect crime, this is will more likely be affected by policy, such as in relation to design. For this reason an uncertain effect has been identified, with regards to SA2.

The District Centre is located outside of the Borough's key employment areas. It is assumed that the development in the District Centre could provide employment developments which will help to support the local economy, however, this is not known for certain. For this reason, an uncertain effect has been identified with regards to SA19 (improve the local economy) and SA20 (maintain employment).

3.10.2 Mitigation & Enhancements

The following mitigation has been identified:

- SA2: Include policy within the Local Plan to encourage reductions in crime through design of developments.
- SA13: Ecological assessment and mitigation required prior to development.
- SA14: AA of Local Plan required to assess effects on European sites and put forward avoidance / mitigation measures.

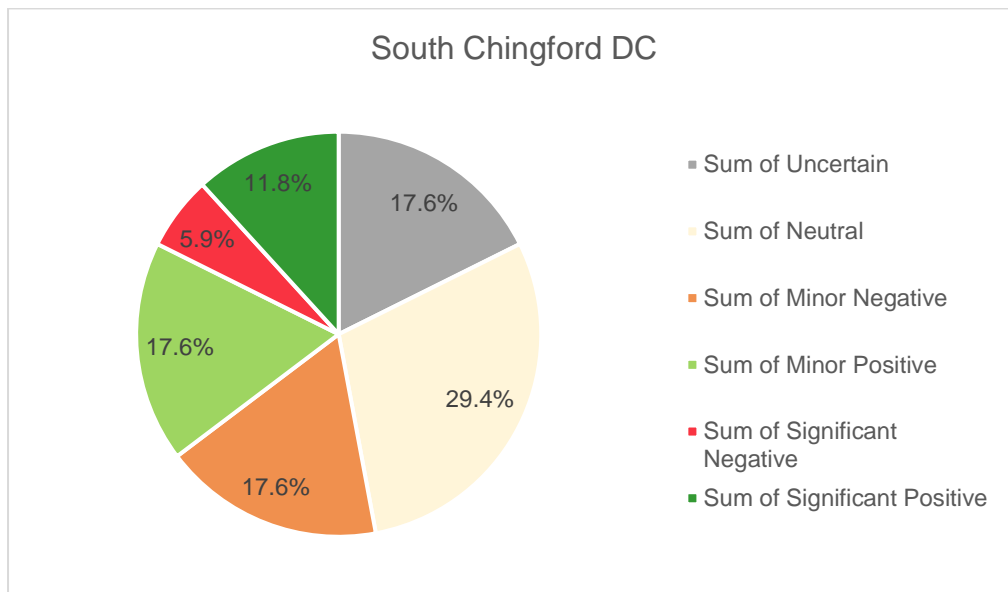
SA17: Archaeological assessment and mitigation required prior to development.

The following enhancement measures have been suggested:

- SA9: Consider limiting car parking provision to one space per household in order to reduce risk of increasing air pollution.
- SA13: Policy could require development to provide a net gain in biodiversity through the provision of open space, garden/landscape planting, bird and bat boxes etc.
- SA17: Policy could require design to ensure that avoiding negative effects on and enhancing the setting of the nearby listed buildings are specifically addressed within the development.

3.11 South Chingford District Centre

3.11.1 Assessment



The assessment of South Chingford District Centre has resulted in significant negative effects with regards to SA14. All sites are located over 1km away from a SAC or SPA. The site however is located less than 1km away from Chingford Reservoirs SSSI. It is unlikely that the development of the site will result in any negative impacts on the SSSI. The HRA screening exercise has identified likely significant effects on European sites associated with development in all parts of the Borough.

The District Centre has a number of facilities within walking distance, therefore, it is assumed that all sites will support the district centre and help to maintain its viability. For this reason, significant positive effects have been identified in relation to SA18 (maintain and enhance the vitality and viability of the Borough's town centres).

Significant positive effects have been identified in relation to SA12 (ensure the efficient use of land and buildings and protect soil quality and geological resources). The District Centre is located well away from the Borough's LIGS and all sites are located on previously developed land, which works towards protection of soil and geological resources.

All sites have good access to a number of community facilities, however, the District Centre is considered to be deprived with regards to barriers to housing. The addition of more homes may well help address the existing housing shortage but may not necessarily support community cohesion. This has therefore resulted in an uncertain effect on SA4 (improve community cohesion).

It is assumed that development will result in some housing, but the numbers aren't known. For this reason an uncertain effect has been identified in relation SA1.

The western part of the District centre is considered to be amongst the top 10% most deprived neighbourhoods in the country, whilst the eastern part is amongst the top 20% most deprived neighbourhoods in the country, with regards to crime. It is unlikely that the allocation of this site will affect crime, this is will more likely be affected by policy, such as in relation to design. For this reason an uncertain effect has been identified, with regards to SA2.

3.11.2 Mitigation & Enhancements

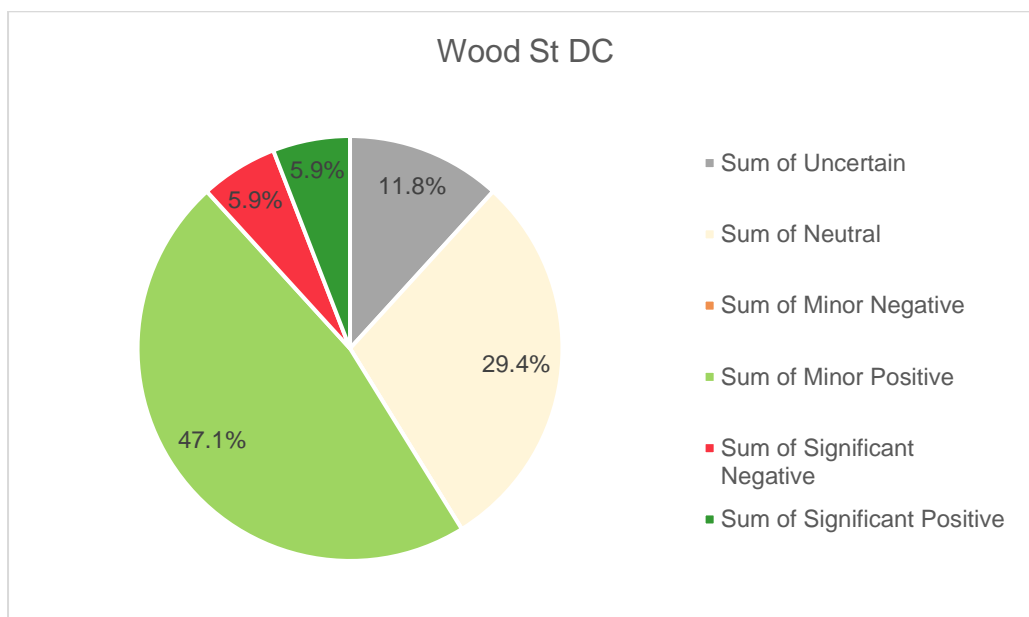
The following mitigation has been identified:

- SA2: Include policy within the Local Plan to encourage reductions in crime through design of developments.
- SA14: AA of Local Plan required to assess effects on European sites and put forward avoidance / mitigation measures.
- SA7 and 9: Consider providing car charging points to improve the uptake up electric car usage. Consider limiting car parking provision in order to minimise air pollution.

No mitigation has been identified.

3.12 Wood Street District Centre

3.12.1 Assessment



The assessment of Wood Street District Centre has resulted in significant negative effects with regards to SA14. All sites are located over 1km away from a SAC, SPA or SSSI. However, the HRA screening exercise has identified likely significant effects on European sites associated with development in all parts of the Borough.

Significant positive effects have been identified in relation to SA12 (ensure the efficient use of land and buildings and protect soil quality and geological resources). The District Centre is located well away from the Borough's LIGS and all sites are located on previously developed land, which works towards protection of soil and geological resources.

It is assumed that development will result in some housing, but the numbers aren't clear. The range of tenures and sizes could be determined by policy. For this reason an uncertain effect has been recorded, with regards to SA1. All sites have good access to a number of community facilities, however, the District Centre is considered to be deprived with regards to barriers to housing. The addition of more homes may well help address the existing housing shortage but may not necessarily support community cohesion.

The northern part of the District centre is considered to be amongst the top 10% most deprived neighbourhoods in the country, whilst the southern part is amongst the top 20% most deprived neighbourhoods in the country, with regards to crime. It is unlikely that the allocation of this site will affect crime, this is more likely to be affected by policy, such as in relation to design. For this reason an uncertain effect has been identified, with regards to SA2.

3.12.2 Mitigation & Enhancements

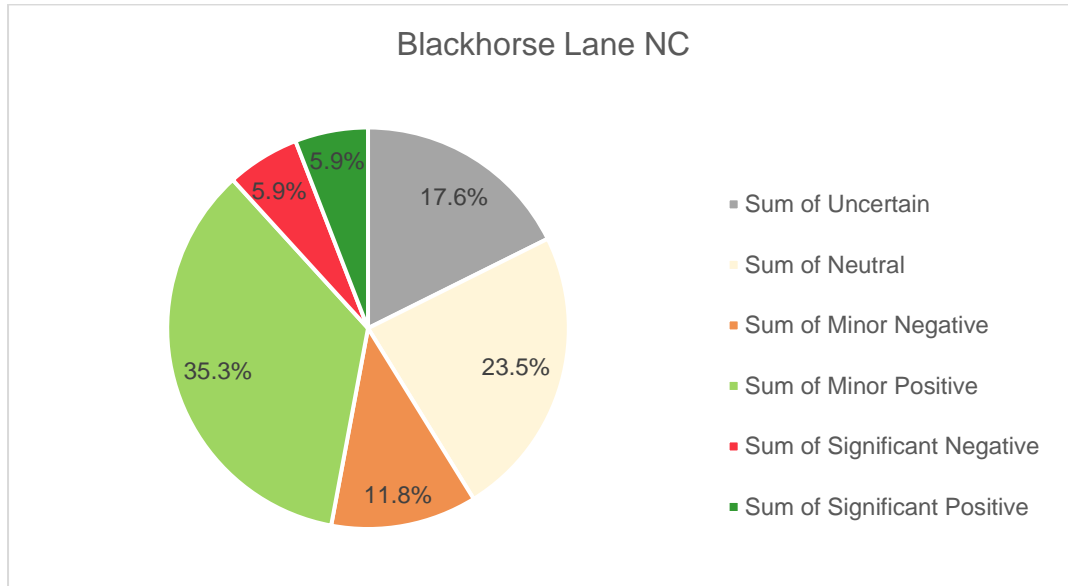
The assessment has identified the following mitigation measures:

- SA2: Include policy within the Local Plan to encourage reductions in crime through design of developments.
- SA14: AA of Local Plan required to assess effects on European sites and put forward avoidance / mitigation measures.

No mitigation has been identified.

3.13 Blackhorse Lane Neighbourhood Centre

3.14 Assessment



The assessment of Blackhorse Road Neighbourhood Centre has resulted in a significant negative effect in relation to the protection of the ecological integrity of SSSI and Natura 2000 sites (SA14). Both sites within the neighbourhood centre are located less than 400m away from Lee Valley SPA. Ecological assessment and mitigation would therefore be needed for potential impact on habitats and species within Lee Valley SPA and Walthamstow Reservoir SSSI.

The Neighbourhood Centre is located outside of both a town or district centre, but Walthamstow Town Centre is 1.1km away (on foot) and is one stop away on the Victoria Line (2 mins) from Blackhorse Road Station. It is however, not clear if the development of the Neighbourhood Centre will help to support Walthamstow, and has therefore resulted in an uncertain effect with regards to SA18 (maintain and enhance the vitality and viability of the Borough's town centres).

It is assumed that development will result in some housing, but the numbers aren't clear. The range of tenures and sizes could be determine by policy. For this reason an uncertain effect has been recorded, with regards to SA1.

Both sites within the Neighbourhood Centre are considered to be deprived with regards to crime and are amongst the top 10% most deprived neighbourhoods in the country. The allocation of this site is not likely to effect crime, and therefore an uncertain effect has been identified.

The Neighbourhood Centre is located outside of a town/district centre, but Walthamstow Town Centre is 1.1km away (on foot) and is one stop away on the Victoria Line (2 mins) from

Blackhorse Road Station. It is not clear if the development of the Neighbourhood Centre will help to support Walthamstow.

3.14.1 Enhancement & Mitigation

The following mitigation has been identified:

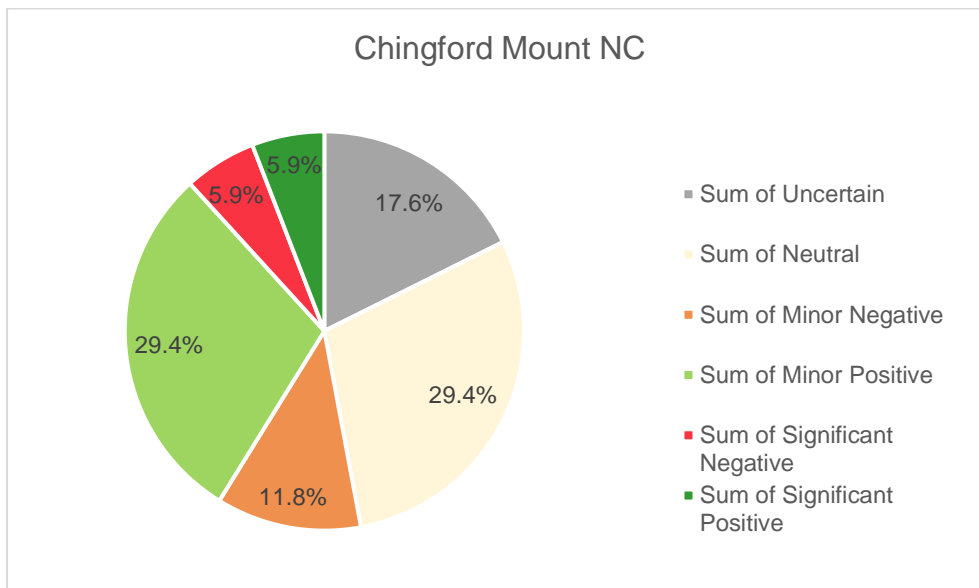
- SA2: Include policy within the Local Plan to encourage reductions in crime through design of developments.
- SA14: Ecological assessment and mitigation required for potential effects on the deciduous woodland habitat as well as the sensitive habitats within Lee Valley SPA and Walthamstow Reservoir SSSI. AA of Local Plan required to assess effects on European sites and put forward avoidance / mitigation measures.
- SA18: Limited mitigation available. Ensure uses do not compete with town centre uses.

The following enhancement measures have been suggested:

- SA7: Consider providing car charging points to improve the uptake up electric car usage.
- SA11: Flood risk assessment may be required as a part of planning permission and mitigation put in place to manage drainage on site.

3.15 Chingford Mount Neighbourhood Centre

3.15.1 Assessment



The assessment of Chingford Mount Neighbourhood Centre has resulted in significant negative effects with regards to SA14. All sites are located over 1km away from a SAC, SPA or SSSI. However, the HRA screening exercise has identified likely significant effects on European sites associated with development in all parts of the Borough.

Significant positive effects have been identified in relation to SA12 (ensure the efficient use of land and buildings and protect soil quality and geological resources). The District Centre is located well away from the Borough's LIGS and all sites are located on previously developed land, which works towards protection of soil and geological resources.

It is assumed that development will result in some housing, but the numbers aren't known. For this reason an uncertain effect has been identified in relation SA1.

The western part of the District centre is considered to be amongst the top 10% most deprived neighbourhoods in the country, whilst the eastern part is amongst the top 20% most deprived neighbourhoods in the country, in relation to crime. It is unlikely that the allocation of this site will affect crime, this is will more likely be affected by policy, such as in relation to design. For this reason an uncertain effect has been identified, with regards to SA2.

The Neighbourhood Centre is located outside of a town/district centre, but Highams Park is 1.5km away (on foot) and is accessible by bus. It is unlikely that the development will enhance the vitality and viability of Highams Park. For this reason, an uncertain effect has been identified in relation to SA18 (maintain and enhance the vitality and viability of the Borough's town centres).

3.15.2 Mitigation & Enhancements

The following mitigation has been identified:

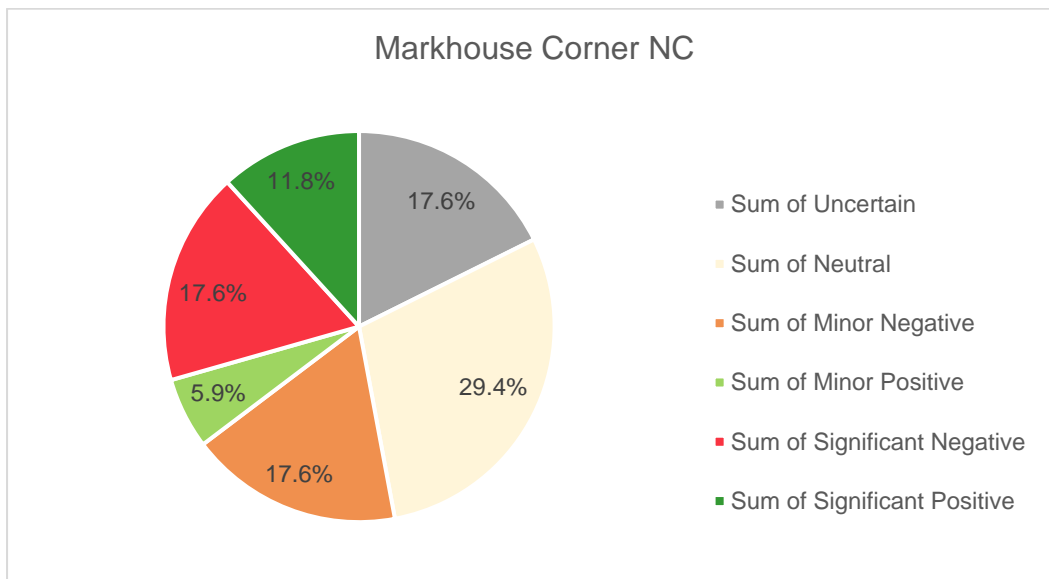
- SA2: Include policy within the Local Plan to encourage reductions in crime through design of developments.
- SA14: AA of Local Plan required to assess effects on European sites and put forward avoidance / mitigation measures.
- SA18: Limited mitigation available. Ensure uses do not compete with Town Centre uses.
- SA19 and SA20: Seek to provide employment developments / opportunities in this area.

The following enhancement measures have been suggested:

- SA7: Consider providing car charging points to improve the uptake up electric car usage.

3.16 Markhouse Corner Neighbourhood Centre

3.16.1 Assessment



The assessment of Markhouse Corner Neighbourhood Corner, has resulted in significant negative effects with regards to SA14. All sites are located over 1km away from a SAC, SPA or SSSI. However, the HRA screening exercise has identified likely significant effects on European sites associated with development in all parts of the Borough.

The site is not well served by public transport and is located outside of the Borough's main employment areas and town/district centres. Development of this site could result in further car usage, which could result in an increase in greenhouse gas emissions and decrease air quality in the Borough. For this reason, a significant negative effect on SA7 (greenhouse gases) and SA9 (improve air quality).

Significant positive effects have been identified with regards to improving the local economy (SA19). The Neighbourhood Centre is located within walking distance of the Dunton Road (800m), Heybridge Way (500m) and Church Road Employment Sites (200m). It is assumed that development will support these employment areas.

Significant positive effects have also been identified in relation to SA12 (ensure the efficient use of land and buildings and protect soil quality and geological resources). The District Centre is located well away from the Borough's LIGS and all sites are located on previously developed land, which works towards protection of soil and geological resources.

With the exception of recreational facilities, the Neighbourhood Centre provides a number of community facilities and services, however, the area is considered to be deprived with regards to barriers to housing. The addition of more homes may well help address the existing housing shortage but may not necessarily support community cohesion. This has therefore resulted in an uncertain effect on SA4 (improve community cohesion).

The western part of the Neighbourhood Centre is amongst the top 10% most deprived neighbourhoods in the country with regards to crime, whilst the eastern part is amongst the top 20% most deprived neighbourhoods. It is unlikely that the allocation of this site will affect crime, this is will more likely be affected by policy, such as in relation to design. For this reason an uncertain effect has been identified, with regards to SA2.

It is assumed that development will result in some housing, but the numbers aren't known. For this reason an uncertain effect has been identified in relation SA1.

3.16.2 Mitigation & Enhancements

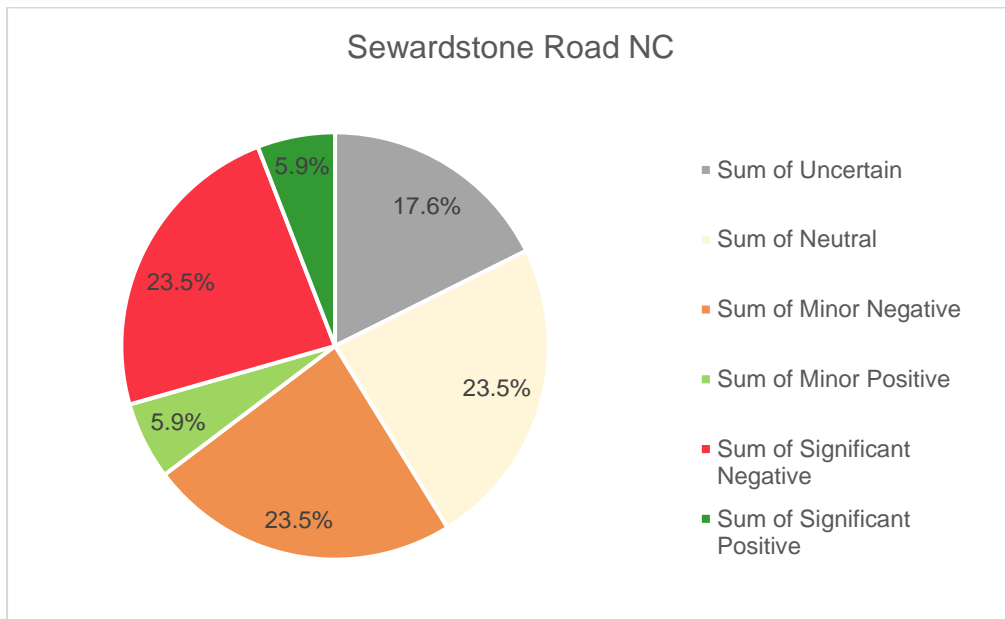
The following mitigation measures have been suggested:

- SA2: Include policy within the Local Plan to encourage reductions in crime through design of developments.
- SA3 and SA4: Seek to incorporate open space and recreational facilities in new developments in order to improve standard of health and wellbeing.
- SA7 and 9: Consider providing car charging points to improve the uptake up electric car usage. Consider limiting car parking provision in order to minimise air pollution.
- SA14: AA of Local Plan required to assess effects on European sites and put forward avoidance / mitigation measures.

Enhancement measures have not been suggested.

3.17 Sewardstone Road Neighbourhood Centre

3.17.1 Assessment



The assessment of Sewardstone Road has resulted in significant negative effects on improvement of opportunities for access to local services, facilities and employment (SA5). The Neighbourhood Centre is served by a number of bus stops, but is over 2km away from the nearest train station in Chingford. PTAL scores are low (1a/1b) indicating that access to public transport is poor. Development of this site could result in further car usage. The Neighbourhood Centre is on the Borough boundary and residents could be more inclined to use facilities in neighbouring Enfield. The poor access of this site has also meant the provision of the site will have a significant negative impact on air quality (SA9) and greenhouse gases (SA7).

The Neighbourhood Centre is located within close proximity to Epping Forest SAC and SSSI and Chingford Reservoir SSSI. Ecological assessment and mitigation would be needed for potential impact on habitats and species within Epping Forest and Chingford Reservoir. The HRA screening exercise has identified likely significant effects on European sites associated with development in all parts of the Borough. This has therefore resulted in a significant negative effect on SA14.

Significant positive effects have been identified in relation to SA12 (ensure the efficient use of land and buildings and protect soil quality and geological resources). The District Centre is located well away from the Borough's LIGS and all sites are located on previously developed land, which works towards protection of soil and geological resources.

The Neighbourhood Centre consists of a small parade of shops, however lacks a community centre. The nearest primary school is located within walking distance (1km - 12mins walk) and the nearest secondary school is 1.2km (14mins walk) away. The Neighbourhood Centre is considered to be deprived with regards to barriers to housing. The addition of more homes may well help the barriers to existing housing shortage but may not necessarily support

community cohesion. For this reason an uncertain effect has been identified, with regards to SA4.

An uncertain effect has been identified with regards to housing (SA1), as it is assumed that development will result in some housing, but the numbers aren't clear, nor is the range of tenures and sizes. Further uncertainties have been recognised in relation to crime (SA2). The Neighbourhood Centre is not considered to be deprived with regards to crime, but it is unlikely that the allocation of this site will reduce crime levels and the fear of crime.

3.17.2 Mitigation & Enhancements

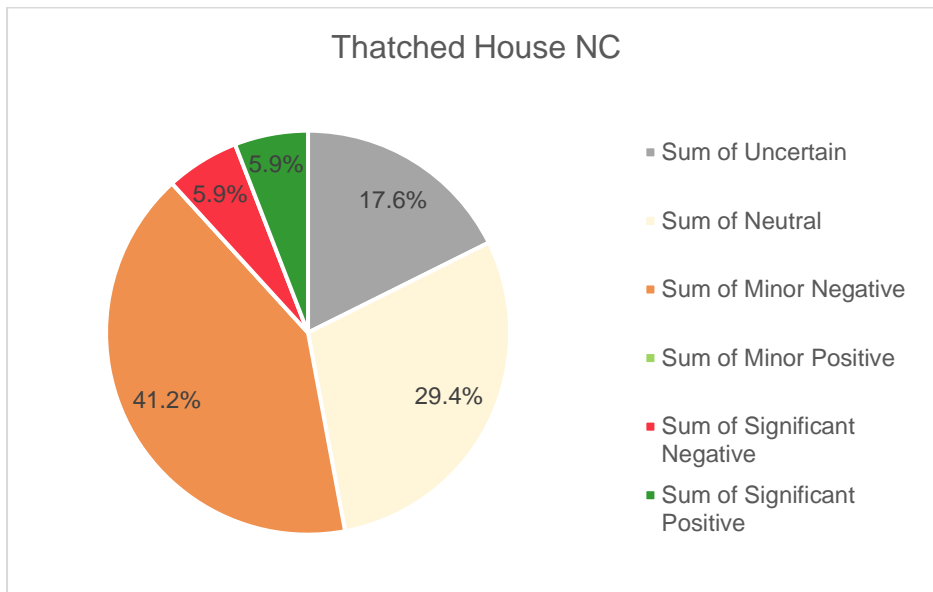
The following mitigation has been identified:

- SA2: Include policy within the Local Plan to encourage reductions in crime through design of developments.
- SA5, SA7, SA9: Consider limiting car parking provision to one space per household in order to reduce risk of increasing air pollution.
- SA12: Flood risk assessment may be required to identify the potential longer term impacts of fluvial flooding as well as other sources such as surface water and reservoir flooding.
- SA14: AA of Local Plan required to assess effects on European sites and put forward avoidance / mitigation measures.
- SA18: Limited mitigation available. Ensure uses do not compete with Town Centre uses.
- SA19 and SA20: Seek to provide employment developments / opportunities in this area.

Enhancement measures have not been identified.

3.18 Thatched House Neighbourhood Centre

3.18.1 Assessment



The assessment of Thatched House Neighbourhood Centre, has resulted in significant negative effects with regards to SA14. All sites are located over 1km away from a SAC, SPA or SSSI. However, the HRA screening exercise has identified likely significant effects on European sites associated with development in all parts of the Borough.

A significant positive effect has been identified in relation to SA12 (ensure the efficient use of land and buildings and protect soil quality and geological resources). The sites within the Neighbourhood Centre are located well away from the Borough's LIGS and all sites are located on previously developed land. This works towards protection of soil and geological resources.

An uncertain effect has been identified with regards to housing (SA1), as it is assumed that development will result in some housing, but the numbers aren't clear, nor is the range of tenures and sizes. Further uncertainties have been recognised in relation to crime (SA2). The Neighbourhood Centre is not considered to be deprived with regards to crime, but it is unlikely that the allocation of this site will reduce crime levels and the fear of crime.

With the exception of recreational facilities, the Neighbourhood Centre provides a number of community facilities and services, however, the area is considered to be deprived with regards to barriers to housing. The addition of more homes may well help the barriers to existing housing shortage but may not necessarily support community cohesion. For this reason, an uncertain effect has been identified in relation to SA4 (community facilities and cohesion).

3.18.2 Mitigation & Enhancements

The following mitigation has been identified:

- SA2: Include policy within the Local Plan to encourage reductions in crime through design of developments.

- SA3 and SA4: Development should seek to incorporate open space and recreational facilities in order to improve standard of health and wellbeing and improve access to facilities.
- SA7 and 9: Consider providing car charging points to improve the uptake up electric car usage. Consider limiting car parking provision in order to minimise air pollution.
- SA14: AA of Local Plan required to assess effects on European sites and put forward avoidance / mitigation measures.
- SA18: Limited mitigation available. Ensure uses do not compete with town centre uses.
- SA19 and SA20: should development be directed to this area, seek to improve employment developments/opportunities.

No enhancement measures have been identified.

3.19 Potential Cumulative Effects of the Existing Spatial Strategy

The following potential cumulative effects have been identified in the assessments of the growth clusters.

3.19.1 Blackhorse Lane Growth Area

Uncertain potential cumulative effects have been identified for this area in relation to SA7 (carbon emissions) and SA9 (air quality). Sites in the north of the cluster have poorer access to public transport. Development of these sites could result in further car usage and increase greenhouse gas emissions and air pollution. However, sites in the south benefit from better transport links. It is therefore uncertain what the overall outcome of directing growth to this area and the potential development sites would be.

3.19.2 Northern Olympic Fringe Growth Area

Sites in the east of the Growth Area are well connected to Leyton and benefit from the facilities within the District Centre. Sites in the west of the Growth Area are not as well connected. Sites in the west of the Growth Area have significantly lower PTAL scores. A potential significant negative cumulative effect has been recorded with regards to SA7 (greenhouse gas emissions) and SA9 (air quality).

3.19.3 South Chingford DC

Potential minor negative cumulative effects have been identified in relation to SA7 (carbon emissions) and SA9 (air quality). The District Centre is served by a number of bus stops, but is over 2km away from the nearest train station in Highams Park. The Borough's employment areas are not within walking distance, which could encourage further car usage for commuting. PTAL scores are medium (3) indicating that access to public transport is lacking. This could increase the use of private cars and subsequently increase greenhouse gas emissions which could result in a cumulative negative effect.

3.19.4 Stewardstone Road NC

Potential significant negative cumulative effects have been identified in relation to SA7 (carbon emissions) and SA9 (air quality). The site is not well served by public transport and is located outside of the Borough's main employment areas and town/district centres. The Neighbourhood Centre is served by a number of bus stops (Routes 215, 313, 385 and 505), but is over 2km away from the nearest train station in Chingford. PTAL scores are low (1a/1b) indicating that access to public transport is poor. Development of this site could result in further car usage, which could contribute to a decline in air quality. And increase greenhouse gas emissions, exacerbating existing sustainability issues in the Borough.

3.19.5 Markhouse Corner NC

Potential significant negative cumulative effects have been identified in relation to SA7 (carbon emissions) and SA9 (air quality). The area is not well served by public transport and is located outside of the Borough's main employment areas and town/district centres. Development in this area could result in further car usage, which could result in an increase in greenhouse gas emissions and air pollution within the borough.

3.19.6 Thatched House NC

Potential minor negative cumulative effects have been identified in relation to SA7 (carbon emissions) and SA9 (air quality). The Neighbourhood Centre is served by a number of bus stops, however, the nearest train station is Maryland, south of the site, in Newham. PTAL scores are moderate (3) indicating that some access to public transport is lacking. Development of this site could result in increased car usage. This could have a subsequent negative effect on greenhouse gas emissions and air quality within the borough and cumulative negative effects on these SA objectives.

In addition to the effects identified above, the potential effects of all of the growth clusters in the Existing Spatial Strategy have been considered together and the following additional potential cumulative effect has been identified:

- SA17 (historic environment): A number of the assessments of growth clusters within the central part of the Borough have identified potential negative effects on historic buildings. Mitigation will need to be put in place in order to avoid the loss of historic assets, a decline in local distinctiveness and in order to avoid significant cumulative negative effects in relation to these SA objectives in this part of the Borough.