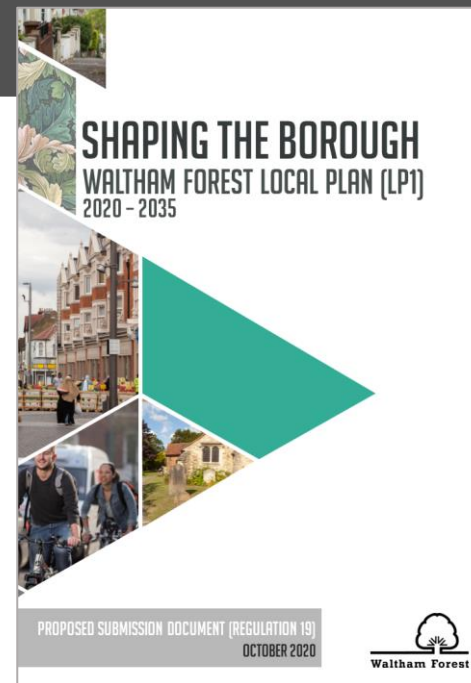


SHAPING THE BOROUGH

WALTHAM FOREST LOCAL PLAN 2020 – 2035 (LP1)

SUBMISSION

SCHEDULE OF PROPOSED CHANGES TO THE DRAFT PLAN



SEPT 2020



**SCHEDULE OF CHANGES MADE TO THE WALTHAM FOREST DRAFT LOCAL PLAN - SHAPING THE BOROUGH, JULY 2019
(INCLUDED IN THE PROPOSED SUBMISSION LOCAL PLAN (LP1), OCTOBER 2020)**

The Waltham Forest Draft Local Plan was published in July 2019 and representations were invited over a 10-week period which ended on 30 September 2019. The following schedule sets out the main changes carried over to the Proposed Submission Local Plan (LP1) – Shaping the Borough published October 2020. These changes to the Draft Plan were proposed primarily in response to comments made during the consultation on the Draft Plan. The Council has taken opportunity to update the plan for better clarity and interpretation and to improve legibility.

CHAPTER 1: INTRODUCTION AND BACKGROUND				
Policy	Paragraph	Page	Proposed Change	Justification
	1.1 – 1.15	1-3	Editing changes made to this chapter.	To provide background context to the Proposed Submission document (Reg 19) and how the plan document is structured.

CHAPTER 2: BOROUGH PORTRAIT				
Policy	Paragraph	Page	Proposed Change	Justification
	2.1-2.11	2-8	Chapter redrafted to fully describe the spatial characteristics of the borough – geography including neighbourhood communities, population, built environment, transport, culture, natural environment, and economy.	To provide full background information on the borough.

CHAPTER 3: VISION AND STRATEGIC OBJECTIVES				
Policy	Paragraph	Page	Proposed Change	Justification
	Figure 3.1	9	Six Golden Threads updated – additional text included to refer to affordable housing delivery, creating liveable places, protecting, enhancing the natural environment, ensuring land optimisation and driving investment.	To take account of other important objectives of the plan.
	Vision Statement and Strategic Objectives	10	Reference made to a new vision of urban living - where all residents can meet most of their needs within a 20-minute walk or cycle from their homes. Reference made to Waltham Forest as a place of leisure and recreation – to include the Borough’s diverse visitor attractions (such as the William Morris Gallery, Walthamstow Wetlands and Victoria Halls) its places, cultural offer and green and blue assets which include access to Epping Forest, the Lee Valley Regional Park, reservoirs and marshland are for residents and all to enjoy.	To incorporate a key strand of the Council’s emerging corporate strategy - building on the success of Enjoy Waltham Forest and its cultural and leisure assets.

CHAPTER 4: WALTHAM FOREST'S SPATIAL AND GROWTH STRATEGY				
Policy	Paragraph	Page	Proposed Change	Justification
	4.1-4.4	15	Editing changes to introductory text.	For better clarity and interpretation.
2		17	Editing changes to policy statement – inclusion of employment growth target of 52,000 sqm of employment land.	To clarify growth targets relating to employment land.
	4.7	17	New explanatory text included on growth requirements – relating to proposed increases in housing numbers, employment and retail provision.	To acknowledge NPPF requirements and for better clarity and interpretation.
	4.9-10	17	Editing changes/new text included to acknowledge uncertainties arising from the Coronavirus pandemic.	To reflect changed circumstances following the outbreak of the Coronavirus pandemic.
3		18	Policy statement redrafted to require development proposals to make viable provision for infrastructure, also stating the key infrastructure projects to be delivered during the plan period and acknowledging the role of infrastructure delivery bodies and agencies, landowners, and developers.	For better clarity and interpretation and to address consultation issues regarding infrastructure provision to support growth.
	4.11- 4.17	19-20	Editing changes to explanatory text of the Policy 3, clarifying infrastructure requirements, referencing the Infrastructure Delivery Plan and drawing attention to the role of the Site Allocations DPD complementing the plan.	For better clarity and interpretation.
4		20	Policy statement redrafted identifying Strategic Locations and Site Opportunity Locations as the primary locations for growth with indicated growth numbers.	For better clarity and interpretation.
	4.18-4.20	21	Further text inserted to supporting paragraphs on the Location and Management of Growth	For better clarity and interpretation and to provide a link to the site allocations DPD.
	4.21-4.24	21	Further text inserted to supporting paragraphs on the 17 Strategic Locations for growth that exist within the borough.	For better clarity and interpretation of the strategic locations in the borough.
	4.25	22	To add a new paragraph to describe the map on page 4.1	For better clarity and interpretation of Map 4.1
5		22-23	To cross reference with chapters: 11 (Distinctive Town Centres and High Streets); Chapter 9 (Building a Creative and Resilient Economy); to make special reference to the Epping	To add context to how the growth strategy in the Local Plan will be managed for better clarity and to respond to comments made by statutory consultees.

			Forest SAC and SSSI and Lee Valley Regional Park SAC RAMSAR and the conserving of the biodiversity and wildlife at these two designated sites. To make reference to the archaeological priority zones.	
	4.26-4.34	23-24	Edited to detail the documents that will be produced to guide development and the weight that they will be given	For better clarity and interpretation.
	4.35	26	More text added to provide further context as to what the Local Plan is seeking to promote in terms of good development and to highlight that the plan plays a substantial part in the boroughs strategy on addressing the climate emergency.	For better clarity and interpretation.
6		26	To cross reference Chapter 14 (Creating High Quality Places) and to add a new reference to Chapter 16 (Addressing the Climate Emergency)	To reference the importance of the role that good design plays in ensuring good growth and to add the importance of addressing the Climate Emergency.
	4.38-4.39	27	New text added to detail types of mixed-use development and intensification to provide context.	To improve clarity and interpretation.
7		28	Enlarged clause 'B' from "approach" to include the requirement to submit supporting implementation / marketing strategy and market evidence and evidence of two years of marketing.	To give better understanding of the information that we require developers to provide.
	4.40-4.42	28-29	Added supporting paragraphs detailing the benefits of mixed use developments, describing their form and the barriers that exist and have to be overcome in delivery. Added text regarding the recognition and mitigation of vacant commercial units in the borough which detract from local areas.	To justify and clarify clause B in Policy 7.
8		29	Swapped "intensification" with "redevelopment" Removed Density and Floor Area Ratio references (FAR) shortened clauses on Transition and Transformation.	To make the policy more concise and align better with the 2021 adopted London Plan.

	4.43-4.46	29-30	Minor text changes to improve clarity by describing the nature of intensification in the borough.	Minor text changes to improve clarity and to address residents' concerns about the meaning of the word 'intensification'.
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CHAPTER 5: SOUTH WALTHAM FOREST				
Policy	Paragraph	Page	Proposed Change	Justification
	5.1	31	Insert "Forest incorporating the Southern Growth Zone"	To reference the southern Growth Zone identified in the borough.
	5.1	31	Insert "response, respectful of area character"	To capture that whilst much of the growth projected in the plan period will be directed to the south of the borough, it will be delivered in a way that is respectful to the existing character of the area.
	5.2	31	Reordered sentence to reference the innovation corridor first.	Reordered sentence for better clarity.
	5.3	31	Added the "Lea Bridge Road"	To provide geographical context.
	5.4	31	Added "At the Northern Edge" and Marshes to the neighbouring borough boundary"	To provide geographical context.
	Vision	32	Update the housing number in line with trajectory and defined that it would be the size of a "new town"	To respond align with the housing trajectory and provide clarity as to scale of the development projected over the plan period.
9		35	Document reordered – South policy overwritten by new policy for South of the borough, removing references to strategic locations.	To ensure that the order in which the borough's three areas is presented in a consistent manner.
9			Insertion of new Clause N to read "Create opportunities to improve and grow the visitor sporting and wider cultural offer	To reflect consultation response from LVRPA.

			of the Lee Valley Regional Park and its venues; including the Lee Valley Ice Centre, the Lee Valley Water Works Centre and the Lee Valley Hockey and Tennis Centre, thereby ensuring their long-term sustainability and contribution to the visitor economy of the borough”	
	5.8	36	Text re-written to reference the opportunity that exists in the South of the Borough and detail the site location opportunities.	To improve clarity and interpretation.
	5.9	36	To reference the GLA’s SHLAA and that the largest amount of Brownfield land lies in the South Area of the Borough.	To reference the SHLAA
	5.10	36	Referencing the areas of development in the south of the borough including and the potential for a new station to be built at Ruckholt Road	To update the paragraph to align with project-led growth.
	5.11	36	To reference the new hospital and the major investment that is proposed at Whipps Cross Hospital.	To update the chapter to reference the New Whipps Cross Hospital project.
	5.12	37	To detail the challenges, support and investment faced by retail in the South of the Borough.	To improve clarity and interpretation of the challenges faced by retail South of the Borough due to its proximity to Stratford and Westfield Shopping Centre.
	5.13-5.15	37	To reference alignment with NPPF on development around transport nodes. To reference the Waste Sites that exist south of the Borough. To reference the cultural infrastructure that exists south of the borough.	To improve clarity and interpretation
	5.15	37	Addition of references to Lee Valley added as follows: “The South is home to important sporting and cultural venues. These include the Lee Valley Ice Centre, Lee Valley Riding Centre and Lee Valley Waterworks Centre in Lea Bridge and Church Road Strategic Location; Leyton Orient, Ive Farm and the Lee Valley Hockey and Tennis Centre in Leyton and the Heart of Leyton (Leyton Cricket Hub) in Bakers Arms and Leyton Green. There are opportunities to add to these facilities, including supporting the night time economy (see	To respond to LVRPA consultation comments.

			Policy 46 - Evening and Night-time Economy Uses) and these will be supported in Strategic Locations and Town Centres (in accordance with Policy 39 - Hierarchy of Centres) and the boroughs cultural and sporting needs (see Policy 36 - Promoting Culture and Creativity).”	
	5.16	37	To add a cross reference to Policy 60 Designing out crime.	To reference that there is a specific need to focus on designing out measures in the Lea Bridge and Bakers Arms Areas of the borough.
	5.17	38	To reference the heritage assets and conservations area in the south of the borough and reference Policy 74 (Conservation Area’s)	To ensure that heritage assets in the borough are referenced in the supporting text to ensure that growth in these areas is appropriate with regards to their historical significance.
	5.18	38	Add refence to Walking and Cycling in the borough	To align with the aspirations for increasing the number of journeys in the borough completed by sustainable means of transportation
	5.19-5.22	38	Paragraph re-ordered and details relating to south Waltham Forest overwritten.	To provide clarity in line with the Council’s strategic priorities and to ensure policy consistency across the document.

CHAPTER 6: CENTRAL WALTHAM FOREST				
Policy	Paragraph	Page	Proposed Change	Justification
	6.2	39	Amended the paragraph to correct geographical referencing and add reference to the Walthamstow Wetlands	To amend incorrect geographical information relating to the Central Area of the borough.
	6.3	39	Amendments to paragraph to correct the terminology for the public transport nodes that exist within the central area of the borough.	To amend incorrect terminology

6.4	39	Inserted a section on the Victorian and Edwardian vernacular of the central part of the borough to assist with the descriptive context of the area.	To capture the character of the majority of the development that is in Walthamstow
6.5	39	Added extra context focussing on Walthamstow Central Transport Interchange and the Town Square, The Mall and Walthamstow High Street and High Street Market	To further define the character of Walthamstow Town Centre
6.6	40	Addition of a descriptive paragraph to help build context of Hoe Street and the heritage assets and landmark developments that exist along it.	To further define the character of Hoe Street
6.7	40	Addition of a descriptive paragraph to help build context of The Forest Road Corridor, the Town Hall Campus and the heritage assets and landmark developments that exist along it.	To further define the character of the Forest Road Corridor
6.8	40	Addition of reference to the Blackhorse Lane Creative Enterprise Zone and manufacturing history of the area to provide background context.	To further define the character of the Blackhorse Road Area and potential CEZ
6.9	40	Addition of text to describe Walthamstow Village and the benefits it brings to the area in terms of cultural growth – especially to the night-time economy.	To assist with defining the character of Walthamstow Village and the contribution it makes to economic growth in the central part of the borough.
6.10	41	Addition of text to describe the Higham Hill Neighbourhood	To further define the character of the Blackhorse Road Area and potential CEZ
Vision	41	Inserted references to the Night-Time Economy, and the regeneration proposed for the Forest Road Corridor at the Town Hall Campus / Fellowship Square	To include references to the major regeneration project proposed at the Town Hall Campus.
6.12-6.19	41-49	Paragraph re-ordered and details relating to Central Waltham Forest overwritten.	To provide clarity in line with the Council's strategic priorities and to ensure policy consistency across the document.

CHAPTER 7: NORTH WALTHAM FOREST				
Policy	Paragraph	Page	Proposed Change	Justification
	7.1 - 7.5	46	Document re-ordered and details relating to Central Waltham Forest overwritten.	To ensure that the order in which the borough's three areas is presented in a consistent manner.
		47	Vision redrafted to replace details of Central Waltham Forest and replace with the vision for North Waltham Forest.	To ensure that the order in which the borough's three areas is presented in a consistent manner.
11			Document reordered – Central policy overwritten by new policy for North of the borough	To ensure that the order in which the borough's three areas is presented in a consistent manner.
	7.6	50	Text updated to replace references to Central Waltham Forest and to provide details on the delivery of homes and employment.	To make consistent with details provided for Central and South Waltham Forest.
	7.7	50	Text inserted to provide detail on spatial character of neighbourhoods.	To provide clarity in line with the Council's strategic priorities and to ensure policy consistency across the document.
	7.8	51	Text added for emphasis and to contextualise placemaking ambitions.	To provide clarity in line with the Council's strategic priorities and to ensure policy consistency across the document.
	7.8	51	Paragraph re-ordered and details relating to Central Waltham Forest overwritten.	To provide clarity in line with the Council's strategic priorities and to ensure policy consistency across the document.
	7.9	51	Paragraph re-ordered and details relating to Central Waltham Forest overwritten.	To provide clarity in line with the Council's strategic priorities and to ensure policy consistency across the document.

	7.10	51	Paragraph re-ordered and details relating to Central Waltham Forest overwritten.	To provide clarity in line with the Council's strategic priorities and to ensure policy consistency across the document.
	7.11	51	Paragraph re-ordered and details relating to Central Waltham Forest overwritten.	To provide clarity in line with the Council's strategic priorities and to ensure policy consistency across the document.
	7.12	51	Paragraph re-ordered and details relating to Central Waltham Forest overwritten.	To provide clarity in line with the Council's strategic priorities and to ensure policy consistency across the document.
	7.13	52	Paragraph re-ordered and details relating to Central Waltham Forest overwritten.	To provide clarity in line with the Council's strategic priorities and to ensure policy consistency across the document.
	7.14	52	Paragraph re-ordered and details relating to Central Waltham Forest overwritten.	To provide clarity in line with the Council's strategic priorities and to ensure policy consistency across the document.
	7.15	52	Paragraph re-ordered and details relating to Central Waltham Forest overwritten.	To provide clarity in line with the Council's strategic priorities and to ensure policy consistency across the document.
	7.16	52	Paragraph re-ordered and details relating to Central Waltham Forest overwritten.	To provide clarity in line with the Council's strategic priorities and to ensure policy consistency across the document.

CHAPTER 8: DECENT HOMES FOR EVERYONE				
Policy	Paragraph	Page	Proposed Change	Justification
	8.1	64	Deletion of reference to the correspondence between the housing target for Waltham Forest and the Draft London Plan.	Updated to reflect the London Plan examination.
	8.2	64	Grammatical changes.	To make sure the plan is readable and clear.

	8.3	64	Insertion of the definition of a 'Healthy Home', (as defined in the JSNA).	Edits made to ensure that the text is readable and clear.
23		66	Deletion of reference to 18,000 homes by 2030, and insertion of reference to Site Opportunity Locations, Policy 4 – Location and Management of Growth, Policy 11 – Delivering Genuinely Affordable Housing, and Policy 18 – Small Sites.	Edits made to reflect the outcome of the London Plan examination, and to better cross-reference to other relevant policies.
	8.5	67	Deletion of reference to the Draft London Plan target.	Edits made to reflect the outcome of the London Plan examination
	8.6	67	Amendment to the stepped trajectory and insertion of reference to the Standard Method. Insertion of updated table setting out annual requirements.	Edits made to sure the text is readable and clear. Additional text to be added to reflect change in housing trajectory approach because of the London Plan change to the housing
	8.7	68	Grammatical changes.	To make sure the plan is readable and clear.
24		68	Addition of detail to affordable housing policy application, including viability review and approach to affordable provision on alternative housing products.	To ensure correspondence with the London Plan.
	8.13	69	Deletion.	In response to consultation.
27		72	Insertion of table. Elaboration of standards.	Updated to reflect the Mayor's Housing SPG as set out by consultation responses.
29		74	Deleted part C is already in the 'increasing housing supply' policy	Edited for readability.
30		75	Minor changes to wording, and insertion of reference to Policy 24 – Affordable Housing and the Draft London Plan.	Edited for readability, and updated cross-reference.
31		77	Deletion of support for 'presumption in favour of small sites'	Updated to reflect the London Plan inspectors report
32		77	Insertion of space standards for conversions and HMOs.	Retention of minimum room standards in HMOs from policy DM6, following DM feedback that this is well-used in dealing with HMO applications. Clarification of part B and C as relating to conversion to smaller units, and HMOs respectively.

				Addition of D) to clarify position on new-build HMOs.
33		78	Amendment of size threshold to 100 units.	
34		79	Minor changes to wording.	Edited for readability.
36		81	Minor changes to wording.	Edited for readability.
	8.32	82	Insertion of implementation section, highlighting the tools for delivering on the objectives through the policies in this chapter.	Cross-reference to other strategies, plans and mechanisms for delivery.

CHAPTER 9: BUILDING A RESILIENT AND CREATIVE ECONOMY				
Policy	Paragraph	Page	Proposed Change	Justification
	Strategic Objective	83	Wording changes, emphasising residents' life chances and local growth.	Improved focus and readability.
	9.1	83	Insertion of text outlining the uncertainty introduced by the Covid-19	To provide updated background context to Policies in this chapter.
	9.2	83	Insertion of: "According to the Employment Land Study 2019, Waltham Forest's economy is shifting away from traditional industrial and manufacturing base to towards a more diverse range of activities driven by creative, digital and entrepreneurs. The shift in the Waltham Forest's economy has been driven by a significant increase in the number of micro and small businesses locating and growing the borough."	To provide more context.
	9.3	83	Insertion of "Ahead of Covid-19"	Updated context
	9.6	84	Insertion of updated need figure for employment floorspace of 52,000 sqm, and constituent breakdown by space type.	Updated need figure from Employment Land Study update 2019.

37		85	Insertion of reference to 52,000 sqm rather than 46,000. Clarification of use classes, and no overall loss reference.	Additional text to update the need figure and clarify that schemes which lead to an overall loss of employment floorspace.
	9.8	85	Update to need figure, and spatial approach to employment land uses.	Updated evidence.
38			Deletion of existing policy. Split into three separate policies, outlining supported land uses and approach for SIL, LSIS, and BEA.	To reflect addition of LSIS, and for ease of interpretation and use.
39		88	Deletion of existing policy. Separate policies proposed outlining the Masterplan Approach (Policy 30), and Co-location Design Principle (Policy 31).	To improve readability and usability.
41		93	Revision of policy to relate to workspaces drawn more broadly than just office uses, reflecting demand for more flexible types of space, particularly studio and workspace.	To accord with updated employment land designations and reflect evidence from Employment Land Study 2019.
42		95	Policy moved to Culture Chapter.	Better suited to sit in Culture chapter.
44		97	Amendment of the Use Classes referenced.	To update references in line with the 2020 UCO amendment.
	9.54	97	Insertion of implementation section, highlighting the tools for delivering on the objectives through the policies in this chapter.	Cross-reference to other strategies, plans and mechanisms for delivery.

CHAPTER 10: PROMOTING CULTURE AND CREATIVITY				
Policy	Paragraph	Page	Proposed Change	Justification
	Strategic Objective	88	Replace "(...) the digital and creative sector has flourished" with new text "(...) the Borough's cultural legacy and creative economy flourish and grow and investment is secured to improve life chances, quality of life and well-being for all."	To provide clarity in line with the Council's strategic priorities and the Borough of Culture Legacy.

	10.1-10.6	88-90	Editing changes made to the explanatory text of the chapter and strategic objective. Inclusion of Figure 10.2 Creative Businesses.	For clarity and better reading of the plan.
36		91	Minor changes to wording. Insertion of text to contextualise and promote culture, art, and creativity.	To improve structure and clarity.
	10.7-10.12	91-92	Editing changes made to the explanatory text of Policy 36.	To improve structure and clarity.
	10.13-10.16	93-94	Editing changes made to the explanatory text of Policy 37. Reference to BAME and LGBTQ+ communities, as well as the Borough's Cultural Infrastructure Study have been added.	To improve structure, clarity, and have a more inclusive approach.
38		95	Change wording with reference to the Intent to Publish London Plan and relocation of policy to the Culture chapter.	The policy has been moved from the employment chapter to the culture chapter to align with GLA comments. Focused on feedback from DTC meetings with the GLA – the policy has been updated to focus on the Blackhorse Area. This supported a self-accreditation process.
	10.17	95-96	Minor changes to wording. Adding Figure 10.3 with the CEZ boundaries	To correct spelling and provide clarity and to ensure policy consistency across the document.
	10.20	97	Minor wording changes with regards to the Publish London Plan	To improve structure and clarity.

CHAPTER 11: DISTINCTIVE TOWN CENTRES AND HIGH STREETS				
Policy	Paragraph	Page	Proposed Change	Justification

	Strategic objective	98	Statement amended to acknowledge Post Covid-19 circumstances.	For better clarity and interpretation.
	11.1-11.4	98	Editing changes to introductory text to acknowledge the likely impact of the Covid-19 pandemic, short/medium assumptions made at the present time.	For better reading of the plan.
	11.5-11.28	100-106	Editing changes made to the explanatory text of Policies 39-41.	For clarity and better reading of the plan.
42-45		106-109	Editing changes made to draft plan policies on managing changes of use to take account of the changes made to the Use Classes Order effective 1 September 2020.	For better clarity and interpretation
	11.29-44	106-113	Editing changes made to the explanatory text of policies 42-47 as above to reflect the new Use Classes Order effective 1 September 2020.	For better clarity and interpretation of the plan

CHAPTER 12: SOCIAL AND COMMUNITY INFRASTRUCTURE				
Policy	Paragraph	Page	Proposed Change	Justification
	12.1-12.2	115	Editing changes made to the explanatory text of the chapter and strategic objective. Life Changes Programme has been removed.	For clarity and better reading of the plan, in line with the Council Strategy.
48		115-116	Combination of policies “Social and Community Infrastructure” and “Loss of Existing Social or Community Infrastructure” and change wording.	Combination of previous two policies to ensure signposting of correct approach and better reading of the policy and chapter.
	12.4-12.10	117	Editing changes made to the explanatory text of policy 48 as above	To improve structure and clarity of the new policy

	12.11-12.16	117-118	Minor changes to wording	To improve structure and clarity.
	12.17-12.30	119-122	Minor changes to wording.	To correct spelling and provide clarity and to ensure policy consistency across the document.

CHAPTER 13: PROMOTING HEALTH AND WELL BEING				
Policy	Paragraph	Page	Proposed Change	Justification
		123	Strategic objective clarified and floating text replaced.	To improve structure and clarity.
	13.1 - 13.5	123	Insertion of first sentence contextualises the Strategic Objective which is expanded in following paragraphs. Previous text on night-time economy replaced.	To improve structure and clarity.
50		124	Insertion of text for context to bind community, places and environments into health context.	To improve structure and clarity.
	13.6 - 13.10	124-125	Previous text on town centre policy replaced.	To improve structure and clarity.
51			Previous text on town centre policy replaced.	To improve structure and clarity.
	13.13-13.14	127	Previous text on town centre policy replaced.	To improve structure and clarity.
52		127	Previous text on town centre policy replaced.	To improve structure and clarity
	13.15	127	Previous text on town centre policy replaced.	To improve structure and clarity
53		128	Previous text on town centre policy replaced.	To improve structure and clarity
	13.16-13.17	128	Previous text on social infrastructure policy replaced.	To improve structure and clarity

54		129	Previous text on social infrastructure policy replaced.	To improve structure and clarity
	13.18-13.22	129	Previous text on social infrastructure policy replaced.	To improve structure and clarity
55		130	Previous text on social infrastructure policy replaced.	To improve structure and clarity
	13.23-13.25	130	Previous text on social infrastructure policy replaced.	To improve structure and clarity
	13.27	131	Implementation paragraph expanded to include scope of working partnerships.	To contextualise policy and to provide relationship framework for effective policy implementation.

CHAPTER 14: CREATING HIGH QUALITY PLACES				
Policy	Paragraph	Page	Proposed Change	Justification
		132	Insertion of first sentence contextualises the Strategic Objective which is expanded in following paragraphs. Previous text on social infrastructure replaced.	To improve structure and clarity.
	14.1-14.2	132	Previous text on social infrastructure policy replaced.	To improve structure and clarity.
56		132	Policy statement re-worded/revised to better provide clarity on the policy criteria to be applied in considering development proposals on matters of design, character, height, scale, urban form and grain, building typologies, architecture, materials, trees etc and to acknowledge the need for a clear and robust design rationale based on a sound understanding and analysis of local context and character. Cross referencing made to Policy 8 – requiring development	For better clarity and to address consultation issues relating to how new developments would be integrated with existing character and the how the Council will protect existing character.

			proposals to achieve appropriate intensification. References also made to other design considerations - visually attractiveness, architecture, landscaping, use of high-quality materials and detailing, legible physical and visual connections with surrounding streets, routes and public realm etc.	
	14.3-14.7	133	Editing changes to the explanatory text of Policy 56 as above.	For better clarity and interpretation
57		134	Policy statement revised to clarify the policy approach that will apply in considering tall and taller buildings. Reworded policy is based on the character-led intensification approach providing indicative height thresholds that will apply.	For better clarity and to address residents' concerns about the introduction of tall and taller buildings in the borough and how new developments would be integrated with existing character.
	14.8-14.14	136-137	Editing changes to the explanatory text of Policy 57 as above.	For better clarity and interpretation of the policy.
58			New policy on residential space standards previously included in the Housing Chapter - reworded and expanded to specify size thresholds and to address a range of issues – including daylight and privacy, internal and external amenity open space and children's play areas.	For better clarity on the interpretation of the policy and to better manage changes to the built environment.
60			Revision to the Policy on Designing Out Crime. This takes account of issues raised by the Metropolitan Police. The policy references the role of the Met Police Counter Terrorism, Traffic Management Unit and the British Transport Police.	For better clarity and interpretation of the policy and to ensure joined up working with government agencies.
	14.8-14.20		Editing changes to the explanatory text of Policy 60 as above.	For better clarity and interpretation of the policy.

CHAPTER 15: ACTIVE TRAVEL, TRANSPORT & DIGITAL INFRASTRUCTURE				
Policy	Paragraph	Page	Proposed Change	Justification
	Chapter Title	142	Section title amended to read Active Travel, Transport & Digital Infrastructure – to acknowledge the fact that transport involves choices about whether to walk, cycle, take public transport or travel by car and also the fundamental transport plays in promoting quality of life and health.	To provide clarity in line with the Council’s strategic priorities and to align with wider policy objectives.
	15.1-15.8	142-143	Minor changes to wording and introduction of additional text as editing changes.	To correct spelling, provide clarity and to ensure policy consistency across the document and in line with the Council’s strategic priorities.
62		144	New policy to promote suitable transport modes and deliver accessible, healthy, and safe Liveable streets, places, and neighbourhoods for all residents.	To improve structure, clarity, and have a more inclusive approach in line with the Council’s strategic priorities and to ensure the plan consistency.
	15.9-15.13	144-146	Minor changes to wording and text added as editing changes to the explanatory text of Policy 62.	Text amended to provide clarification and update statistics.
63		146	Editing changes to ensure the shift to active transport modes is in line with standards including the TfL’s Liveable Neighbourhoods.	Policy amended to provide clarification and to ensure a joined-up approach with TfL.
	15.14-15.17	147-148	Editing changes and text added to the explanatory text of Policy 63	Text amended to provide clarification and update statistics.
64		150	Rewording of the policy for a more inclusive approach of the public transport network and avoid reductions.	To make policy clearer and to acknowledge the role of delivery agencies including TfL, Network Rail and other partners.
	15.18-15.23	150-151	Editing changes and text added to the explanatory text of Policy 64	To correct spelling and provide clarity and to ensure policy consistency across the document.
65		153	New Policy added “Development and Transport Impacts” – referencing the requirement for transport assessments, travel plans and construction logistics plans.	For comprehensiveness and clarity on the policy approach that will be applied in considering planning applications.

	15.24	153	New paragraph added to support Policy 65	To provide clarification.
66		153	Minor changes to wording of the policy.	To correct typographical errors and make the policy clearer.
	15.25-15.27	154	Editing changes made to the explanatory text of Policy 66.	To correct spelling and provide clarity and to ensure policy consistency.
67		154-155	Editing changes and text added to the policy.	To make policy clearer in order to minimise and mitigate impacts of construction logistics on the road network. Also to ensure a joined -up approach with TfL.
	15.28-15.31	155-156	Editing changes and text added to the explanatory text of Policy 67	To provide clarification and better understand of when developers should submit CLPs and its requirements.
68		157-158	Editing changes and text added to the policy.	Policy amended to provide clarification with regards to vehicle traffic, parking standards, and others.
	15.33-15.37	158-159	Minor changes to wording and text added. Editing changes made to the explanatory text of Policy 68.	Text amended to provide clarification and update statistics.
69	15.38-15.39	159-160	Editing changes to policy and supporting text.	To correct spelling and for better clarity.
	15.40-15.45	160	Editing changes supporting text for the section “Utilities and Digital Connectivity”	To correct spelling and for better clarity.
70		160-161	Editing changes to policy.	To correct spelling and for better clarity.
	15.46-15.48	161	Minor changes to wording and text added. Editing changes made to the explanatory text of Policy 70	To correct spelling and provide clarification.
71		162	New policy approach on electronic communications infrastructure	Policy amended to provide clarification.
	15.50-15.52	162-163	New paragraph added to the explanatory text of Policy 71	To contextualise policy and to provide relationship framework for effective policy implementation.
	15.53-15.58	163-164	Editing changes.	To correct spelling and for better clarity.

CHAPTER 16: ENHANCING AND PRESERVING OUR HERITAGE				
Policy	Paragraph	Page	Proposed Change	Justification
	Strategic Objective	165	Amended to improve clarity and interpretation	To improve clarity and interpretation
	16.2	165	Added references to Parks, Gardens and Historic Landscapes and below ground archaeology.	To improve clarity and interpretation
	16.3	165	Added references to conservation area appraisals and Archaeological Priority Zones	To recognise that periodically these documents need updating.
72		166	Referenced “assets and their settings”	To align with current terminology
72		167	Addition of new text detailing for non-designated heritage assets of archaeological interest “Where a Heritage assets that is Non-Designated, but of archaeological interest holds or potentially holds evidence of past human activity worthy of expert investigation at some point, and is demonstrated to be of equal significance to scheduled monuments in the borough the asset will be subject to the conditions of this policy; and H. Where a developer obligation is sought toward Heritage Assets, reference should be made to the Planning Obligations SPD.”	To ensure that non-designated heritage assets of archaeological interest, that have evidence of past human activity are adequately protected.
72		167	Reference hook to the Planning Obligations SPD	To reference the planning obligations SPD
	Bullet Point 2	167	To reference non-designated assets of archaeological interest.	To complete the referencing for what policy 2 seeks to protect.
	16.5	167	To reference that Designated Historic Assets with more significance have a greater presumption in favour of conservation.	To align with NPPF
	16.6	167	Added “Heritage” to correct to Heritage at Risk Register	Correction
	16.7-16.9	167	Minor changes to wording.	To correct spelling and provide clarity and to ensure policy consistency across the document.

73		169	Referenced “assets and their settings”	To align with current terminology
	16.10-16.15	169-170	Minor changes to wording.	To correct spelling and provide clarity and to ensure policy consistency across the document.
74		171	Reference hook to the Planning Obligations SPD	To reference the planning obligations SPD
	16.17-16.22	171-172	Minor changes to wording.	To correct spelling and provide clarity and to ensure policy consistency across the document.
75		172	To Reference Archaeological Assets and Priority Zones	To align with the updated evidence base on archaeological priority zones and to reflect the collaborative work undertaken with Historic England on the review of APZ designations.
75		172	To provide a hook so that investigations of non-designated heritage assets of archaeological interest are assessed by relevant experts	To align with the updated evidence base on archaeological priority zones and current best practice and NPPF guidance.
75		172	Reference hook to the Planning Obligations SPD	To reference the planning obligations SPD
	6.23-6.25	173	Insertion details for GLAAS for legibility and guidance for planning applications that trigger the requirement for a consultation from an archaeological expert.	To align with the updated evidence base on archaeological priority zones and current best practice and NPPF guidance.
76		173	Minor changes to wording.	To correct spelling and provide clarity and to ensure policy consistency across the document.
	16.26	173	Listed structures, landscapes and gardens of archaeological interest to provide context	To align with the updated evidence base on archaeological priority zones and current best practice and NPPF guidance.
77		174	Minor changes to wording.	To correct spelling and provide clarity and to ensure policy consistency across the document.
	16.27-16.28	174	Minor changes to wording.	To correct spelling and provide clarity and to ensure policy consistency across the document.
78		174	Minor changes to wording.	To correct spelling and provide clarity and to ensure policy consistency across the document.
	16.29	174	Minor changes to wording.	To correct spelling and provide clarity and to ensure policy consistency across the document.

CHAPTER 17: PROTECTING AND ENHANCING THE ENVIRONMENT				
Policy	Paragraph	Page	Proposed Change	Justification
		175	Strategic Objectives updated with new text, also acknowledging the need to work with partners to protect and enhance the adjoining areas of regional, national and international natural importance in Epping Forest and the Lee Valley Regional Park.	To provide clarity in setting out objective priorities.
	17.1	175	Text updated to include ponds and to replace and to refer to rivers, ditches and streams, forest, lakes and open spaces, also referencing the borough's environmental assets including Metropolitan Open Land, Sites of Metropolitan Importance to Nature Conservation, Sites of Borough Importance to Nature Conservation, Sites of Local Importance to Nature Conservation, Sites of Special Scientific Interest, Local Nature Reserve, Epping Forest and the Lee Valley Regional Park, Special Protection Area (SPA) and RAMSAR and Epping Forest Special Area of Conservation (SAC).	Additions are intended to clarify the scope of the policies in this section.
	17.2 -17.7	175-176	Revision to paragraphs for better description of the borough's green assets and their role for recreation. Editing changes made to correct typo error and the inclusion of additional text to provide more detailed information.	Ease of reading, emphasis, more detail and context and for better referencing.
79		177-178	Policy renumbered from 84. Minor revisions in wording introducing a requirement to maximise opportunities for urban greening per London Plan policy G5, to require ongoing maintenance of public space and to ensure that improvements to access routes or green corridors does not result in any adverse effects on the integrity of the Epping Forest Special Area of Conservation.	For better clarity and interpretation of the policy and to ensure consistency with the London Plan.
	17.8	178	New paragraph inserted making reference to Green Infrastructure as defined in the NPPF, also referencing water	In response to LWT - Clarification of nature of Green infrastructure to reflect NPPF definition.

			bodies such as the Reservoirs and the Walthamstow Wetlands.	
	17.9	178	New paragraph inserted to acknowledge the point that the delivery of green and blue infrastructure is a key component of sustainable development, and is a thread which connects the policies contained in this chapter underpinned by the vision set out in the Council's Green and Blue Infrastructure Strategy (2020).	In response to LWT - Clarification of nature of Green infrastructure.
	17.10	178	New paragraph inserted to acknowledge the point that the delivery of green infrastructure may involve measures such as the planned retention and provision of high quality trees and the use of natural and green landscaping in new development through to the delivery of park and open space improvements to maximise the potential for residents to meet and interact.	In response to LWT - Clarification of nature of Green infrastructure.
	17.11	178	Added new text to link greenbelt and Metropolitan Open Land (MOL) to green infrastructure and to clarify protection across a range of designations - also in response to comments made by London Wildlife Trust.	Clarification of nature of Green infrastructure and to ensure that there is policy support for the retention of existing GB/MOL and resisting of inappropriate development.
	17.12	179	Revision to explanatory paragraph to explain the policy requirement on the submission of an ecology report applying the Mayor's Urban Greening Factor and the thresholds that will apply.	For clarification and consistency
	17.13	179	Clarification regarding maintenance of open space in and near new development.	For clarification and consistency
80		181	Editing changes to policy statement to ensure that appropriate strategies are referred to.	For consistency.
		182	Insertion of table 17.1 set out the Borough's Open Space typology.	To clarify green space typologies.
	17.16	182	Editing changes to paragraph	For clarification.
	17.17	182	Revision to paragraph to reference the projected rise in the borough's population over the plan period and the need to address shortfalls in existing provision and make improvements in accordance with the Playing Pitch Strategy.	To complete open space typology and to ensure consideration of sports facilities.

	17.18	183	Insertion of new text to reference the London Plan Policy (S5) on the co-location of sports facilities particularly within new and existing schools, colleges, commercial schemes, and community centres as part of mixed-use developments.	To complete open space typology and to ensure consideration of sports facilities.
81		185	Editing changes made to policy statement for better legibility.	For clarification and ease of reading.
	17.19	186	Editing changes to paragraph for better wording.	For clarification.
	17.21	186	Insertion of additional text to acknowledge the effect of proposals either alone or in combination which are likely to have an adverse impact on any internationally designated wildlife sites and the need to satisfy the requirements of the Conservation of Habitats and Species Regulations.	To align with policy 83.
	17.22	186	Insertion of explanatory text on Biodiversity Net Gain.	To ensure consistency with London Plan policy G6
	17.23	187	Editing changes to paragraph – for better wording	For clarification.
	17.24 - 17.25	187	Insertion of explanatory text to acknowledge the importance of geodiversity as a fundamental natural resource and a key factor in the borough's cultural identity and the need for its conservation, sustainable management, educational use, for geodiversity and archaeology.	To ensure proper consideration of issues relating to geodiversity.
	17.26	187	Insertion of explanatory text to address the Council's position on hydraulic fracturing, otherwise known as fracking. Reference is made to the evidence from the British Geological Survey and the London Plan – for justification.	To ensure proper consideration.
	17.27- 17.28	187	Insertion of explanatory text to address the Council position on aggregates – that Waltham Forest has no requirement for a landbank apportionment in the London Plan and there is no history of gravel extraction in Waltham Forest in the recent past.	For better clarity and interpretation.
82		188	Tree policy updated – rewording changes	To ensure proper consideration.
	17.29 - 17.31	188	Insertion of explanatory text on Policy 82 relating to tree preservation.	To provide clarification.
	17.30 -31	188	Text amended to include wider benefits provided by trees.	To ensure proper consideration.
	17.32- 17.36	189	Revision to explanatory text on the importance of tree preservation, the role of Tree Preservation Orders (TPOs) and	To ensure proper consideration.

			the need for existing trees to be integrated positively into new development at the earliest stage of design. Reference is made to the need for appropriate arboriculture information and tree planting and the tools to be used (CAVAT) for measuring the amenity value of trees.	
83	17.37-17.47	190	New policy separating Epping Forest from Lea Valley. Improvements to text on Epping Forest context. Removal of Lea Valley references to form new policy.	To ensure proper consideration and to capture the regionally important issues arising from the Epping Forest.
	17.43 – 17.46 Table 17.2	191 - 193	New text inserted to provide clarity on mitigation measures required in relation to Epping Forest Special Area of Conservation.	To ensure proper consideration and to aid decision - making.
84		193	Separate policy for Lea Valley Regional Park.	To ensure proper consideration and to aid decision - making.
84		193	Revision of policy statement by removing Clause B and merging into existing Clause D /new Clause C.	To take into account LVRPA consultation response
84		193	Insert Lee Valley Park Development framework into new clause C	To take into account LVRPA consultation response
85		194	Revision to policy statement to safeguard likely adverse impacts on the water environment, species or habitats and that enhancement measures and to ensure no deterioration of WFD waterbodies.	To take account for consultation responses from Environment Agency and Canal and Rivers Trust.
	17.54	195	Insertion of additional text to acknowledge the role of the planning application process and the use of planning obligations as set out in the Planning Obligations SPD.	To ensure proper consideration and to aid decision - making.
	17.59		Implementation section updated and new text inserted to clarify the tools to be used in implementing the policies in this chapter of the Plan.	To ensure proper consideration and to aid decision - making.

CHAPTER 18: ADDRESSING THE CLIMATE EMERGENCY				
Policy	Paragraph	Page	Proposed Change	Justification
	Strategic Objectives	197	Revision to statement to reflect the borough's Climate Emergency declaration.	To reference the borough's declaration of a climate emergency
	18.1	197	Text inserted to reference the Climate Emergency Declaration.	To align with the council's declaration and the other strategies in the Local Plan
87		198	Revision to policy statement to reference the minimum 35% reduction below part L and targeting Zero Carbon where possible.	To align with the NPPF and the LBWF aspiration for becoming a Zero Carbon Borough.
	18.2-18.5	199	Editorial changes to paragraphs for better wording.	To correct spelling and provide clarity and to ensure policy consistency across the document.
88		199	Amended policy to correctly set parameters for developments location in relation to de-centralised energy networks and connections to existing or planned network.	To align with the NPPF and the Council's declaration and the other strategies in the Local Plan.
	18.6	200	Explanatory text amended to align with policy 88	To provide better clarity and interpretation.
89		200	Minor changes to assist with policy interpretation and insertion of new wording surrounding circular economy and waste strategy	To align with the NPPF, other council strategies and best practice.
	18.7	201	Insertion of new paragraph to ensure new standards and guidelines will be followed if BREAMM and the Sustainable Design and Construction SPG are replaced and amended	To ensure that best practise continues to be followed if these standards are superseded.
90		201	Amended to refer to the role of the Planning Obligations SPD	To reference the planning obligations SPD
	18.8	202	Minor changes to wording.	To provide clarity and to ensure policy consistency across the document.
91		202	Amendments to water usage in line with current guidance and cooperation with utilities providers	To and to assure the alignment with utilities providers.
	18.11-18.13	203	Editing changes to paragraphs for better wording.	To provide clarity and to ensure policy consistency across the document.

92		204	Editing changes to paragraphs for better wording.	To provide clarity and to ensure policy consistency across the document.
	18.14	204	Editing changes to paragraphs for better wording.	To correct spelling and provide clarity and to ensure policy consistency across the document.
93		204	Clause D amended to include cooperation with neighbouring authorities on when development is proposed near the borough boundary. Additional point included to secure developer contributions for off-site flood risk mitigation where net – zero standards cannot be achieved on site.	To align with the NPPF and best practice.
	18.15	204	Editing changes to paragraphs for better wording.	To correct spelling and provide clarity and to ensure policy consistency across the document.
	18.16	207	Inserted reference to the SuDs Manual and the surface water runoff calculations	To provide better interpretation and clarity
94		207	Editing changes to paragraphs for better wording.	To provide clarity and to ensure policy consistency across the document.
	18.17-18.18	207	Editing changes to paragraphs for better wording.	To provide clarity and to ensure policy consistency across the document.

CHAPTER 19: PROMOTING SUSTAINABLE WASTE MANAGEMENT				
Policy	Paragraph	Page	Proposed Change	Justification
95		209	Policy renumbered	Document reordering.
	19.4	209	Paragraph revised for cross referencing purposes – to refer to other chapters/policies of the Plan – Policy 66 (Delivering High-Quality Design), Policy 68 (Amenity), Policy 73 (Freight and Servicing) and Policy 95 (Sustainable Design and	To take account of policy reorganisation.

			Construction), Policy 56 (Delivering High-Quality Design), Policy 59 (Residential Amenity), Policy 66 (Deliveries, Freight and Servicing) and Policy 89 (Sustainable Design and Construction).	
	19.6	209	Details relating to North London Waste Plan updated.	To reflect current state of North London Waste Plan.
	19.13 – 19.14	210 - 211	Insertion of new text to include references to the Mayor’s Circular Economy Guidance and the North London Waste Plan	To ensure consistency with the London Plan

CHAPTER 20: DELIVERING THE PLAN				
Policy	Paragraph	Page	Proposed Change	Justification
	20.18	215	Paragraph revised to reference the requirement for the preparation of the Infrastructure Funding Statement and to make clear the Council’s intention to review and update the Infrastructure Delivery Plan.	For better clarity and interpretation.
	20.20	215	New text included to acknowledge the Government’s intention to consult on proposals through the White Paper to merge the existing Community Infrastructure Levy (CIL) and Section.106 Planning Obligations to create a new 'Infrastructure Levy' and to express the Council’s committed to secure maximum investment leverage in the boroughs infrastructure, also working proactively with regard to any future successor regulations as enacted by Parliament throughout the lifespan of the plan.	Updates for better clarity and interpretation.

APPENDIX 1: PARKING STANDARDS				
Policy	Paragraph	Page	Proposed Change	Justification
			New information - tables included on Parking Standards to support Chapter 15 of the Plan.	For clarity and interpretation of the Plan.

APPENDIX 2: EMPLOYMENT LAND CHARACTER & VISIONS				
Policy	Paragraph	Page	Proposed Change	Justification
			New information - tables on Employment Land Character & Visions to support Chapter 9 of the Plan.	For clarity and interpretation of the Plan.

APPENDIX 3: POLICIES MAP CHANGES				
Policy	Paragraph	Page	Proposed Change	Justification
		246-267	New information included (Policies Map Changes) identifying the changes made to the currently adopted Local Plan Policies Map.	For clarity and interpretation of the Plan.

APPENDIX 4: EVIDENCE BASE				
Policy	Paragraph	Page	Proposed Change	Justification
	4.1	268	List of Evidence Base documents updated	To ensure that the latest evidence-based documents that underpin the policies in the local plan are captured.

APPENDIX 5: MONITORING INDICATORS AND TARGETS

Policy	Paragraph	Page	Proposed Change	Justification
Appendix 5		269-279	Updated information as set out in tables showing indicators/targets to be used in monitoring the effectiveness of the Local Plan.	For better clarity and interpretation of the Plan.