

**London Borough of Waltham Forest  
Draft Local Plan  
Sustainability Appraisal**



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**Prepared by:**

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# Waltham Forest Borough Council

A report by ClearLead Consulting Ltd. in association with CAG Consultants



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# 1 Introduction

## 1.1 Background

The London Borough of Waltham Forest (LBWF) Council are in the process of preparing a draft Local Plan to guide development in the Borough. The Local Plan, when adopted, will replace the currently adopted Core Strategy for the London Borough of Waltham Forest.

A new Local Plan is needed as the population in Waltham Forest is expected to grow by 21% by 2050<sup>1</sup>. The Council has aspirations for growth, including significant new housing and sustained economic growth, to provide jobs for local people and increase the supply of housing, including affordable units.

Development Plan Documents must be subject to a Sustainability Appraisal (SA), an integral part of the plan preparation process. This must also incorporate the requirements of the Strategic Environment Assessment (SEA) Directive. This SA report has been carried out on behalf of LBWF by CAG Consultants in association with ClearLead Consulting Ltd to help integrate sustainable development into the draft Local Plan. It is being published and consulted on and it will inform the development of the draft Local Plan.

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

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

LBWF Council consulted on a new Local Plan ‘Direction of Travel’ document in November – December 2017. The Direction of Travel document was the first stage in the engagement process with residents, businesses and other stakeholders on what the new Local Plan should contain. It presented the challenges and opportunities for the Borough and a Vision for Waltham Forest, looking ahead to what the Borough will be like in 15 to 20 years’ time. The Direction of Travel document presented options for consultation, comprising six spatial strategy options for development in the Borough. These options were subject to Habitats Regulations Assessment (HRA) screening as well as Sustainability Appraisal (SA).

## 1.2 This document

CAG Consultants have been commissioned to undertake the Sustainability Appraisal (SA) of the Local Plan. This has been performed in conjunction with ClearLead Consulting. This document is the SA for the Waltham Forest Local Plan.

The remaining sections of this document are structured as follows:

- **Section 2 Methodology** describes the approach to the SA;
- **Section 3 The Scope and Content of the draft Local Plan** and sets out its vision and objectives

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<sup>1</sup> GLA 2015 round population projections

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

### 1.3 Sustainability Appraisal and Strategic Environmental Assessment

SA of Local Plans is required under sections 19 of the Planning and Compulsory Purchase Act 2004. The National Planning Policy Framework (March 2012) also requires SA of Local Plans. The SA must incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations). The SEA Regulations transpose the SEA Directive (2001/42/EC) into English law and applies to a range of plans and programmes, including Local Plans. The SEA Directive aims at a high level of protection of the environment, and to integrate the consideration of the environment into the preparation and adoption of plans and with a view to promoting sustainable development.

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

### 1.4 Habitats Regulations Assessment

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

An HRA of the Local Plan is underway. Natural England has confirmed in August 2017 that the three European sites which need to be considered in the HRA are:

- Epping Forest SAC;
- Lee Valley SPA and the Lee Valley Ramsar site; and
- Wormley-Hoddesdonpark Woods SAC.

HRA screening was undertaken of the Direction of Travel document and published within the accompanying SA report.

The screening identified a number of 'likely significant effects' on European sites which require further investigation through Appropriate Assessment (AA) in the context of the draft Local Plan. The AA will need to consider the following:

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

The HRA of the draft Local Plan is underway to determine whether it would, either alone or in combination with other plans or projects, result in an adverse impact upon the integrity of a European site, in terms of its conservation objectives and qualifying interests. The findings of the HRA will be presented within a HRA report later in 2019. Once available, the findings of the HRA will be incorporated into the SA.

## 1.5 How to comment on this document

This report is being consulted on with the statutory consultees<sup>2</sup> to confirm that it provides sufficient information to ensure that a robust and legally compliant SA is carried out. Other interested parties are also being notified and the document will be also available on the Council's website.

The consultation period will be six weeks from 9<sup>th</sup> October until 20<sup>th</sup> November 2019. We would welcome your views on this SA Report. A series of questions are set out below in order to guide responses.

### Questions to guide responses:

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

### How to comment:

Please provide responses by **20<sup>th</sup> November** to:  
Planning Policy Team, London Borough of Waltham Forest,  
Magistrates Court,  
Town Hall Complex,  
Forest Road,  
London  
E17 4JF

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

# 2 Approach to the SA

## 2.1 SA process and requirements

The SA process is shown in Figure 1. Stage A, Scoping, was completed in September 2017.

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

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

Figure 1: The SA Process

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

## 2.2 Stage A: Scoping

The first stage (Stage A) of the SA process involved consultation on a SA Scoping Report which has been completed. In the SA Scoping Report, the topics set out within the SEA Regulations have been expanded into a number of sustainability topics as presented within Table 1 to include socio-economic topics as well as environmental. The SA topics have been updated from those presented within the previous LDF Scoping Report (2008).

Table 1: SA Topics Compared with SEA topics

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

The Scoping Report was consulted on with the statutory consultees<sup>3</sup> between 24<sup>th</sup> July to 29<sup>th</sup> August 2017 (a period of 5 weeks). The Scoping Report presented baseline information on the environmental, social and economic characteristics of the plan area, including the likely evolution of the baseline within the plan period. The Scoping Report set out a framework (called the 'SA Framework') for the assessment of the plan and its alternatives, identifying the significant effects that the assessment will need to focus on. The Scoping Report was amended following consultation and published in September 2017 as a post-consultation version. The final version of the SA Framework is shown in [Table 2](#).

<sup>3</sup> Natural England, Historic England, and the Environment Agency

Table 2: SA Framework Objectives

SA Objective	Description	Key Sustainability Issues
SA1	<b>Meet local housing needs through the provision of a range of tenures and sizes of new dwellings</b>	<ul style="list-style-type: none"> <li>As the population continues to increase so does the demand for housing, infrastructure and facilities</li> <li>The population density within the Borough exceeds both the London and the national averages</li> <li>There is a need to create high quality places to live, work and recreate that are mixed and well-balanced in terms of tenure and income</li> <li>Promote high quality housing with a range of tenures to reduce health issues which arise from poor quality accommodation</li> <li>There is a disparity between the cost of housing and the amount that people are able to borrow to purchase a home, which means that many people are unable to access the property market</li> <li>There is a shortfall in the provision of affordable housing to meet the requirements of those in housing need</li> <li>28% of households are unsuitably housed; there is a potential shortfall in the provision of family accommodation and there is overcrowding, primarily in the private rental sector</li> <li>Homelessness is expected to increase</li> <li>Need to offer greater quality, flexibility and choice to those who rent.</li> <li>There is a need to increase the supply of well-designed housing of all tenures</li> <li>Need to introduce more flexible approaches for affordable housing contributions to encourage open market and mixed tenure specialist older people's housing.</li> </ul>
SA2	<b>Reduce crime and the fear of crime</b>	<ul style="list-style-type: none"> <li>Increases in racist and religious hate crimes</li> <li>The percentage of residents that are worried about crime in the Borough remains higher than the London average</li> <li>Need to provide safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life</li> <li>Need to develop an approach to tackling crime, improving liveability and reducing anti-social behaviour.</li> </ul>
SA3	<b>Improve standard of health and wellbeing of those who live and work in the Borough</b>	<ul style="list-style-type: none"> <li>Currently a large proportion of the population are aged over 50 and this is projected to rise over the next 20 years (+26% rise by 2021)</li> <li>Improve life expectancies through promoting healthy lifestyles for all ages</li> <li>Need to ensure adequate access to green spaces and recreational facilities to promote active and healthy lifestyles</li> <li>Need to increase recognition of the growing evidence of a relationship between physical and mental health</li> <li>Need to ensure that hospitals have fit for purpose facilities (i.e. less converted houses) that meet the needs of patients</li> <li>Need to increase levels of active travel throughout the borough in order to increase physical activity levels and tackle poor air quality.</li> </ul>
SA4	<b>Improve community cohesion and reduce inequalities through the provision of community facilities to meet local cultural, educational, recreational</b>	<ul style="list-style-type: none"> <li>Inequalities in health and life expectancy between ethnic groups</li> <li>Disparities between wards, particularly between the north and south of the Borough</li> <li>Need to provide inclusive services; promote equal opportunities; oppose discrimination, intolerance and disadvantage through reducing inequalities and promoting community cohesion</li> <li>Help to support development of successful neighbourhoods</li> <li>There is a need to create high quality places to live, work and recreate that are mixed and well-balanced in terms of tenure and income</li> <li>Adequate support and facilities for older residents, including independent living, has been noted in particular to be needed</li> <li>Need to build on borough's arts, culture and sport strengths across the borough's diverse and changing population.</li> </ul>

SA Objective	Description	Key Sustainability Issues
	<b>and social needs</b>	<ul style="list-style-type: none"> <li>• Need to reduce the number of older people who feel socially isolated, by getting them actively participating in community life</li> <li>• Currently a large proportion of the population are aged over 50 and this is projected to rise over the next 20 years (+26% rise by 2021)</li> <li>• Need to ensure that growth supports the delivery of vital infrastructure and new facilities across the borough</li> <li>• Help to support development of successful neighbourhoods</li> <li>• Need to ensure that all residents have access to training and skills development to enable them to access and progress into high quality employment.</li> </ul>
<b>SA5</b>	<b>Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system, reducing car use for all journey lengths</b>	<ul style="list-style-type: none"> <li>• Continual growth in car ownership will contribute to further air pollution, and associated impacts on climate, human health and biodiversity</li> <li>• Need to work towards improving air quality and reducing noise impacts from transport</li> <li>• There is a need to make public transport more accessible in some areas of the Borough</li> <li>• There is a need to promote walking and cycling (building on Enjoy Waltham Forest (“Mini Holland”) programmes) for local journeys in place of travel by private car. There should also be a focus on promoting public transport use instead of cars for medium and longer journeys</li> <li>• There is a need to reduce car parking spaces in order to discourage private car use and improve air quality</li> <li>• One in five journeys each weekday morning and afternoon involves trips to school, even though most journeys to schools are under a mile. There is a need to reduce school journeys by reducing Drop Off/Pick Up arrangements for new school developments, and encouraging sustainable, active travel amongst school pupils</li> <li>• As the population grows, so does the need to change current infrastructure to meet the demands of all residents whilst making it future proof</li> <li>• Need to ensure that growth supports the delivery of vital infrastructure and new facilities across the Borough</li> <li>• Need to provide public transport capacity and safeguard land for transport</li> <li>• Help to enhance London’s transport connectivity</li> <li>• Improvements to road safety are needed to reduce casualties</li> <li>• Need to make cycle parking safe and easy to use</li> <li>• There is a need to provide electric vehicle infrastructure, such as charging points.</li> </ul>
<b>SA6</b>	<b>Prevent production of waste, improve resource efficiency and increase recycling and recovery</b>	<ul style="list-style-type: none"> <li>• The amount of waste produced is reducing but still exceeds both the London and national average</li> <li>• The London Plan encourages greater self-sufficiency for waste management in London and sustainable transportation of waste.</li> <li>• Recycling is increasing but still falls short of government targets</li> <li>• Need to ensure that growth supports the delivery of vital infrastructure and new facilities across the Borough</li> <li>• Need to minimise the impact of municipal waste management on the Borough’s environment</li> <li>• Need to reduce the carbon footprint of municipal waste</li> <li>• Need to ensure that all waste is managed in the most environmentally friendly way.</li> </ul>
<b>SA7</b>	<b>Reduce greenhouse gas emissions and promote</b>	<ul style="list-style-type: none"> <li>• Greenhouse gas emissions need to be stabilised and reduced over time</li> <li>• Help promote low carbon heat network</li> </ul>

SA Objective	Description	Key Sustainability Issues
	<b>low carbon growth</b>	<ul style="list-style-type: none"> <li>• Need to identify opportunities for growth of the low carbon economy in the Upper Lee Valley</li> <li>• There is a need to provide electric vehicle infrastructure, such as charging points.</li> </ul>
<b>SA8</b>	<b>Conserve energy</b>	<ul style="list-style-type: none"> <li>• There is a need to continue to promote the construction of energy efficient buildings, and to support the installation of renewable and low or zero carbon technology.</li> </ul>
<b>SA9</b>	<b>Improve air quality</b>	<ul style="list-style-type: none"> <li>• Continual growth in car ownership will contribute further air pollution</li> <li>• Reliance on the petrol or diesel-fuelled private car as the main mode of transport</li> <li>• Air pollution from the strategic road network is an issue across the Borough and NO2 emissions are remaining constant, not decreasing as predicted</li> <li>• Increasing use of biofuels (biodiesel and biomass) for heating schemes will cause further air quality issues</li> <li>• Need to help reduce pollution from road vehicles, buildings, industry and construction</li> <li>• Need to improve efficacy of measures within the AQMA</li> <li>• There is a need to provide electric vehicle infrastructure, such as charging points.</li> </ul>
<b>SA10</b>	<b>Improve water quality in rivers and groundwater and ensure the efficient use of water resources</b>	<ul style="list-style-type: none"> <li>• Diffuse urban water pollution exists in local rivers and water bodies</li> <li>• Increasing population will put strain on water resources</li> <li>• Potential impacts of the Local Plan policies and site allocations on groundwater need to be identified and addressed.</li> </ul>
<b>SA11</b>	<b>Reduce the risk of flooding and improve resilience to climate change</b>	<ul style="list-style-type: none"> <li>• High number of properties at risk at flooding and there is a need to promote flood resistance and resilience measures for these properties.</li> <li>• New development will need to incorporate SUDS to sustainably reduce flood risk</li> <li>• Need to promote the use of new technologies and innovation in flood mitigation measures</li> <li>• There will be an increasing need to plan for and implement/facilitate climate change adaptation, in respect of rising temperatures, water scarcity and extreme weather events, particularly heavy rainfall/flooding</li> <li>• There is a need to plan and prepare for the expected impacts of unavoidable climate change by developing adaptation responses and building resilience</li> <li>• New developments need to minimise vulnerability and provide resilience to climate change</li> <li>• There is a need to work with communities to help tackle climate change.</li> </ul>
<b>SA12</b>	<b>Ensure the efficient use of land and buildings and protect soil quality and geological resources</b>	<ul style="list-style-type: none"> <li>• There is finite availability of previously developed land for development; this may result in the use of greenfield land in the future</li> <li>• There is a need to protect soils and the important ecosystem services they provide – particularly during construction and development</li> <li>• Need to protect designated geological sites.</li> </ul>
<b>SA13</b>	<b>Conserve and enhance biodiversity and the natural environment,</b>	<ul style="list-style-type: none"> <li>• Support is needed to achieve local BAP targets</li> <li>• Need to promote effective land-management to support, protect and enhance biodiversity</li> </ul>

SA Objective	Description	Key Sustainability Issues
	<b>improving resilience to climate change</b>	<ul style="list-style-type: none"> <li>Increases in population will cause a demand for more development, where there is a potential for loss of valuable habitats which have yet to be designated for nature conservation as a direct result</li> <li>Consider and plan for the impacts of climate change on species and habitats</li> <li>There is a need to help encourage people to engage with the ownership, design, management, maintenance and use of their environment as part of their own vision for their neighbourhood</li> <li>Need to recognise the wider benefits of ecosystem services; minimise impacts on biodiversity and provide net gains in biodiversity where possible</li> <li>Need to work to conserve and enhance the local environment.</li> </ul>
<b>SA14</b>	<b>Protect the ecological integrity of SSSI and Natura 2000 sites</b>	<ul style="list-style-type: none"> <li>Large areas of the SSSI sites are considered to be in either unfavourable with no change or to be in an unfavourable and declining condition</li> <li>SSSIs and European sites within the Borough are under threat from poor air quality, recreational pressure and urban effects (including issues with litter)</li> <li>Need to protect and enhance the wildlife and habitats in Waltham Forest, in particular those of international, national and regional importance.</li> </ul>
<b>SA15</b>	<b>Maintain and enhance the quality of the green belt and open space areas</b>	<ul style="list-style-type: none"> <li>Large areas of open space are Metropolitan Green Belt. There is a need to protect these areas of open space from development pressure.</li> </ul>
<b>SA16</b>	<b>Maintain and improve local distinctiveness</b>	<ul style="list-style-type: none"> <li>Need to establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit</li> <li>Need to work towards conserving local character and history, by reflecting the identity of local surroundings and materials. This should not prevent or discourage appropriate innovation.</li> </ul>
<b>SA17</b>	<b>Conserve and enhance the historic built environment</b>	<ul style="list-style-type: none"> <li>A number of listed buildings are identified as being in poor condition and are have been included on Historic England's Heritage at Risk Register. Opportunities exist to improve the condition of some listed buildings through development</li> <li>Ensure that the Conservation Areas, Heritage Assets and features are preserved or enhanced</li> <li>New developments should respect the urban and historic context, improve townscape and leave a positive architectural legacy</li> <li>Impacts of future development on the local historic environment need to be considered</li> <li>Heritage assets should be managed to sustain their significance</li> <li>Ensure that everyone is able to participate in understanding and sustaining their local historic environment</li> <li>Development could encroach on Conservation Areas and subsequently negatively affect townscape and heritage assets.</li> </ul>
<b>SA18</b>	<b>Maintain and enhance the vitality and viability of the Borough's town centres</b>	<ul style="list-style-type: none"> <li>Further action is needed in order to support and promote retail, business, cultural, leisure and residential investment in town centres.</li> </ul>
<b>SA19</b>	<b>Improve the local economy by enabling employment</b>	<ul style="list-style-type: none"> <li>Action is needed to provide more support for business start-ups because only 71% of new businesses in the Borough survive more than 2 years.</li> </ul>

SA Objective	Description	Key Sustainability Issues
	<b>developments in appropriate places</b>	<ul style="list-style-type: none"> <li>• Lower than average salaries could affect the Borough's ability to attract inward investment</li> <li>• Continue to support the Upper Lee Valley Development Opportunity Area and celebrate its industrial heritage</li> <li>• There are likely to be ongoing pressures on industrial sites, need to maintain industrial uses and promote strong local base of small businesses</li> <li>• Need to provide additional workspaces and promote denser, mixed use development with no net loss of business floor space.</li> </ul>
<b>SA20</b>	<b>Maintain stable levels of employment in the Borough</b>	<ul style="list-style-type: none"> <li>• Skills development in growth areas is also needed both for those who are currently unemployed or underemployed</li> <li>• Encourage and promote flexible working arrangements for residents to support people when gaining skills and moving into employment</li> <li>• There are large inequalities in employment and skill levels. between wards within the Borough. Need to ensure that regeneration is inclusive</li> <li>• Ensure that ongoing business growth becomes a driver of productivity and fairer wages (e.g. encouraging the London Living Wage), in order to create an increase in the overall prosperity of the Waltham Forest Borough</li> <li>• There is a need to create fair employment and good work for all</li> <li>• In work support is needed to ensure sustainment of jobs, professional development and progression into better paid, secure higher quality jobs</li> <li>• Need to promote employment, training programmes and sector-based initiatives in the growth of skills to support creative and digital industries, construction and facilities management, retail and hospitality, and finance and business services.</li> </ul>

## 2.3 Stage B: Alternative Options assessment

The appraisal of the two spatial strategy options (the new strategy plus the option of continuing with the existing spatial strategy) along with the previous appraisal of the Direction of Travel document is a part of Stage B of the SA process (developing and refining reasonable alternatives and assessing effects). It fulfils the requirements to identify, describe and evaluate the likely significant effects on the environment of "reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme".

Policy direction options set out within the Direction of Travel consultation document<sup>4</sup> (November 2017) were assessed in September – October 2017. The policy directions options covered the following topics:

- Building a Resilient Economy
- Climate Change Resilience
- Creating High Quality Places
- Culture and Visitor Attractions
- Decent Homes for Everyone
- Enhancing and Preserving Heritage
- Meeting Social and Community Infrastructure Needs

<sup>4</sup> Accessible here: <https://walthamforest.gov.uk/content/local-plan>

- Protecting and Enhancing the Environment
- Providing Physical Infrastructure
- Town Centres and High Streets

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

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

The New Spatial Strategy included 16 clusters of development sites which have been called 'Growth Areas', 'Hubs', 'Areas of Opportunities' and 'Future Potential Sites'. The SA process assessed the 16 clusters and the individual Growth Capacity sites contained within them. The individual Growth Capacity sites included within the clusters were assessed using the red, amber, green (RAG) rating method outlined in Section 2.4, which was then used to inform the overall assessment of each cluster.

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

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

This stage involves identifying the significant environmental effects of the draft Local Plan including short, medium and long term; permanent and temporary; positive and negative effects and documenting the SA process and presenting the findings within an SA Report. All Local Plan policies have been assessed against the SA Framework and reference has been made to the baseline data and key sustainability issues in the Borough identified during the scoping stage. Significance criteria set out in Table 4 have been used to determine the potential sustainable performance of the policies. The Local Plan contains three distinct areas, all of which have a general, overarching policy. Each general area also had separate policies for the strategic locations contained within them. There were 16 strategic location policies. These are listed below:

### **Area Policy - South Waltham Forest**

- Policy 7: Lea Bridge and Church Road Strategic Location
- Policy 8: Low Hall Strategic Location
- Policy 9: Leyton Strategic Location
- South Leytonstone Strategic Location
- Policy 10: Leytonstone Strategic Location
- Policy 11: Whipps Cross Strategic Location
- Policy 12: Bakers Arms Strategic Location

### **Areas Policy - Central Waltham Forest**

- Policy 13: Walthamstow Town Centre Strategic location
- Policy 14: Forest Road Corridor Strategic Location
- Policy 15: Blackhorse Lane Strategic Location

- Policy 16: Wood Street Strategic Location

**Area Policy - North Waltham Forest**

- Policy 18: North Chingford Strategic Location
- Policy 19: South Chingford/Chingford Mount Strategic Location
- Policy 20: Highams Park Strategic Location
- Policy 21: Sewardstone Road Strategic Location
- Policy 22: North Circular Corridor Strategic Location

The assessment of these 16 policies and three overarching policies has been informed by a study undertaken by Troy Planning which identified all currently potentially available development sites within the borough. All of the sites are previously developed land. A GIS layer was provided to the SA consultants and the location of these sites was used to inform the potential effects of the strategic location policies, as these are the sites which could potentially be developed to deliver the development aims for these areas. The sites are not proposed for allocation.

The RAG (red, amber, green) output then informed the assessment of the strategic location policies. The assessment of these policy options needed to consider site characteristics and location. This also needed to be done in a consistent manner, ensuring a 'level playing field'. In this case, time and resource limitation meant there was limited potential to generate data for all site options through site visits and/or discussions with site promoters. Available data was used to inform the assessment of each site against the SA Framework Objective, which was then used to develop RAG site assessment criteria (Table 3).

GIS data was not appropriate or available to support the assessment against the following SA objectives:

- SA1: Meet local housing needs through the provision of a range of tenures and sizes of new dwellings
- SA2: Reduce crime and the fear of crime
- SA6: Prevent production of waste, improve resource efficiency and increase recycling and recovery
- SA7: Reduce greenhouse gas emissions and promote low carbon growth
- SA8: Conserve energy
- SA10: improve water quality in river and groundwater and ensure the efficient use of water resources
- SA16: Maintain and improve local distinctiveness
- SA20: Maintain stable levels of employment in the Borough.

This is because the sub-objectives which support these SA objectives are not spatial i.e. whether a site could contribute to the achievement of these SA objectives does not relate to its location. Therefore, the assessment of these SA objectives has used the significance criteria described above, without the additional data from the GIS which has been available for the spatial elements of other objectives.

Where GIS has been identified as being able to inform the assessment, a RAG rating was applied to each indicator. This was determined through the application of a set of RAG criteria which are set out in Table 3. These criteria have been generated through reference to existing guidance / good practice and the sources of this guidance and good practice are also included within Table 3. Some criteria have been identified using professional judgement of the consultants and where this is the case it is indicated within Table 3. Only the SA objectives which can be informed by the GIS are included within this table.

The results of the RAG ratings (see Appendix C) then informed the assessment of spatial strategy policies 6-22 against the SA framework.

Table 3: RAG Criteria

SA Objective	Indicator	RAG Criteria	Justification
SA3	Proximity to a GPs/Health centre/hospital	>800m 400-800m <400m	CIHT Planning for Walking Guidelines, 2015 <sup>5</sup>
	Proximity to recreational facilities	>800m 400-800m <400m	CIHT Planning for Walking Guidelines, 2015 <sup>6</sup>
SA4	Proximity to a Town, Local, Neighbourhood or District Centres	>0.8km walking distance <0.8km walking distance <0.4km walking distance <0.2km walking distance	CIHT Planning for Walking Guidelines, 2015 <sup>6</sup>
	Proximity to a primary school	>3.2km <3.2km <1km	Home to School Transport and Travel Guidance, 2014 <sup>6</sup>
	Proximity to a secondary school	>4.8km <4.8km <1km	Home to School Transport and Travel Guidance, 2014 <sup>7</sup>
	Proximity to a community centre	>800m 400-800m <400m	CIHT Planning for Walking Guidelines, 2015 <sup>6</sup>
	Proximity to a place of worship	>800m 400-800m <400m	CIHT Planning for Walking Guidelines, 2015 <sup>6</sup>
	Proximity to a shopping frontage	>800m 400-800m <400m	CIHT Planning for Walking Guidelines, 2015 <sup>6</sup>
	Proximity to recreation facilities	>800m 400-800m <400m	CIHT Planning for Walking Guidelines, 2015 <sup>6</sup>

<sup>5</sup> Chartered Institution of Highways and Transportation (CIHT), Planning for Walking, April 2015

<sup>6</sup> Department for Education, Home to school Travel and Transport Guidance, Statutory Guidance for Local Authorities, July 2014

SA Objective	Indicator	RAG Criteria	Justification
SA5	Proximity to a bus stop	>400m <400m	CIHT Planning for Walking Guidelines, 2015 <sup>6</sup>
	Proximity to a train/tube station	>800m <800m	CIHT Planning for Walking Guidelines, 2015 <sup>6</sup>
	Proximity to an employment area	>800m 400-800m <400m	CIHT Planning for Walking Guidelines, 2015 <sup>6</sup>
	PTAL Score	0-2 3-4 5-6B	TfL, Assessing Transport Connectivity in London, 2015 <sup>7</sup>
SA9	Proximity to a bus stop	>400m <400m	CIHT Planning for Walking Guidelines, 2015 <sup>6</sup>
	Proximity to a train/tube station	>800m <800m	CIHT Planning for Walking Guidelines, 2015 <sup>6</sup>
	PTAL Score	0-2 3-4 5-6B	TfL, Assessing Transport Connectivity in London, 2015 <sup>8</sup>
SA11	Flood Zone	Zone 3 Zone 2 Zone 1	Environment Agency Guidance <sup>8</sup>
SA12	Previously developed land?	No Part Yes	Professional judgement
SA13	Priority habitat and Local Nature Reserve	Includes or is adjacent <50m >50m	Red 'flag' is given where development of a site could result in the loss and therefore fragmentation of priority habitats. Amber 'flag' given where there is potential for disturbance of priority habitats within 50m of the site. <sup>9</sup>

<sup>7</sup> Transport for London, Assessing Transport Connectivity in London, 2015

<sup>8</sup> Environment Agency, Flood risk Assessment: Local Planning Authorities Guidance <https://www.gov.uk/guidance/flood-risk-assessment-local-planning-authorities>

<sup>9</sup> Sustainability Appraisal (SA) of the South Somerset Local Plan Review Interim SA Report South Somerset District Council. October 2017

SA Objective	Indicator	RAG Criteria	Justification
SA14	Proximity to a SSSI	<200m 200 - 800m >800m	RTPI Strategic Environmental Assessment, Practice Advice, 2018 <sup>10</sup>  It is recognised that distance in itself is not a definitive guide to the likelihood or significance of effects on a SSSI.
	Proximity to a Natura 2000	<400m <1km >2km	It is recognised that distance in itself is not a definitive guide to the likelihood or significance of effects on a European site and this is considered by the HRA which informs the outputs of the SA9.
SA15	Green Belt	Yes Part No	Professional judgement
	Metropolitan Open Land	Yes Part No	Professional judgement
SA17	Conservation Area	Intersects or is adjacent <50m >50m	It is appropriate to 'flag' a site red where a site is within, intersects or is adjacent to a Conservation Area. It is also appropriate to flag sites that might more widely impact on the setting of a Conservation Area and a 50m threshold has been assumed. It is recognised that distance in itself is not a definitive guide to the likelihood or significance of effects on a heritage asset.  It is also recognised that the historic environment encompasses more than just designated heritage assets.
	Listed Buildings	Intersects or is adjacent <50m >50m	Whilst there is good potential to highlight where development in proximity to a heritage asset might impact negatively on that asset, or its setting, a limitation relates to the fact that it has not been possible to gather views from heritage specialists on sensitivity of assets / capacity to develop each of the sites. This is

<sup>10</sup> Royal Town Planning Institute, Strategic Environmental Assessment, Practice Advice, 2018

SA Objective	Indicator	RAG Criteria	Justification
			a notable limitation as potential for development to conflict with the setting of historic assets / local historic character can only really be considered on a case-by-case basis rather than through a distance-based criterion. It will also sometimes be the case that development can enhance heritage assets <sup>9</sup> .
	Proximity to a historic park or garden	<300m <1km >1km	RTPI Practice Advice, 2019
SA18	Town Centres (Walthamstow or District Centres)	>0.8km walking distance <0.8km walking distance <0.4km walking distance <0.2km walking distance	CIHT Planning for Walking Guidelines, 2015 <sup>6</sup>
SA19	Town, Neighbourhood or Local Centres (Walthamstow, District Centres)	>0.8km walking distance <0.8km walking distance <0.4km walking distance <0.2km walking distance	CIHT Planning for Walking Guidelines, 2015 <sup>6</sup>
	Borough Employment Areas	>800m 400-800m <400m	CIHT Planning for Walking Guidelines, 2015 <sup>6</sup>

The findings of the draft policies assessment are summarised in Section 7 and detailed assessment tables are presented in Appendices C and D.

Table 4: Significance definitions for SA

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

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

## 2.5 Assumptions and Limitations

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

Baseline data has been available across the Borough however there are cases where data gaps have been identified. This have been listed for each topic area in Section 5 of this report, Summary of Baseline Data. The baseline data was gathered between April – May 2017 and was considered up to date when published following consultation in September 2017.

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

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

Some assumptions and limitations are noted within the assessments of the policies as shown in Table 5. The appraisal findings have needed to make assumptions regarding future infrastructure delivery. In practice, however, infrastructure delivery is highly uncertain. If it is a case that infrastructure delivery lags behind housing development, or does not materialise at all, then the results of the assessment may alter.

**Table 5: Assumptions and limitations made during the SA of Local Plan Policies**

Policy	Assumption made
Policy 3: Location and Management of Growth	SA5: It has been assumed that references to social infrastructure include transport.
Policy 6: South Waltham Forest, Policy: Central Waltham Forest, Policy 17: North Waltham Forest	It was assumed that development which occurs within these areas will focus on currently potentially available development sites which are all previously developed land.
Policy 6: South Waltham Forest, Policy: Central Waltham Forest, Policy 17: North Waltham Forest	It has been assumed that a range of sizes and tenures of homes will be provided in line with Policy 25: Affordable Housing Tenure and Policy 26: Housing Size and Mix, in order to meet the needs of the Borough.
Policy 28: Accessible and Adaptable Housing	It has been assumed that this policy relates to all dwelling types, including apartments.
Policy 85: Open Spaces, Sport and Recreation	"Open Space" has been assumed to be referring to outside space which is open to the public, containing grass, trees and/or other vegetation.

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

Table 6 outlines where elements of the SEA regulations are addressed within the report.

**Table 6: Fulfilling the Requirements of the SEA regulations**

<b>What the regulations say<sup>11</sup></b>	<b>How this is addressed</b>
An outline of the contents, main objectives of the plan or programme.	Set out in Section 3 of this document.
An outline of the relationship with other relevant plans and programmes.	Set out in Section 4 of this document.
The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	Set out in Section 5 of this document.
The environmental characteristics of areas likely to be significantly affected.	Section 3.3 of this document outlines the characteristics of the plan area in general and Section 5.13 outlines those areas likely to be significantly affected. These characteristics and potential interactions have been informed by information contained within the SA baseline data (Section 5).
Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.	Section 5 of this document outlines key sustainability issues related to each SA topic. This includes sites designated pursuant to Directives 79/409/EEC and 92/43/EEC. Further information will also be available in the separate Habitat Regulations Assessment (HRA) Report to be published at a later date.
The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation.	Section 4 and Appendix B outline relevant environmental protection objectives. The way that those environmental objectives have been taken into account has been through integrating them into the SA Framework.
The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. The identification of the above effects should consider secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects.	Section 7 sets out the significant effects of the draft Local Plan and Section 6 discusses the significant effects of reasonable alternatives. Details of the nature of effects are provided within Appendices C and D. This includes indirect (secondary), cumulative (cumulative and synergistic), duration (short/medium/long term), permanent or temporary and negative or positive effects. Definitions are provided within Table 4 in Section 2.4.
The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	Section 9 sets out mitigation measures for significant negative (negative) effects and uncertain effects and relevant enhancement measures.

<sup>11</sup> Please see Schedule 2 of the SEA regulations: *Information for Environmental Reports*.

**Table 6: Fulfilling the Requirements of the SEA regulations**

What the regulations say <sup>11</sup>	How this is addressed
An outline of the reasons for selecting the alternatives dealt with	Section 6 outlines the reasons for selecting the alternatives dealt with.
A description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.	Section 2 outlines the methodology for all stages of the SA and Section 2.5 specifically describes any technical difficulties that were encountered.  Section 5 outlines data gaps.
A description of measures envisaged concerning monitoring.	Set out in Section 10 of this document.
A non-technical summary of the information provided under the above headings.	See separate non-technical summary.
The report must include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment.	The whole SA Report addresses this.
Consultation: Authorities with environmental responsibility, when deciding on the scope and level of detail of the information which must be included in the environmental report (Art. 5.4).	The Scoping Report was consulted on with key stakeholders <sup>12</sup> , adjoining boroughs and the public for a five week period from 24 <sup>th</sup> July to 29 <sup>th</sup> August 2017.
Authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme.	This SA report will be consulted on between 9 <sup>th</sup> October and 20 <sup>th</sup> November and amended where appropriate.
EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country.	Section 7 presents the potential significant effects of the draft Local Plan. The assessment has not identified any potential effects on other EU member states.
Taking the environmental report and the results of the consultations into account in decision-making (Art. 8). Provision of information on the decision: When the plan or programme is adopted, the public and any countries consulted under Art.7 must be informed and the following made available to those so informed: The plan or programme as adopted. A statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report of Article 5, the	This will be set out in the SA Adoption Statement.

<sup>12</sup> Environment Agency, Natural England, Historic England are the SEA statutory consultees.

Table 6: Fulfilling the Requirements of the SEA regulations

What the regulations say <sup>11</sup>	How this is addressed
<p>opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Art. 7 have been taken into account in accordance with Art. 8, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with. The measures decided concerning monitoring.</p>	
<p>Monitoring of the significant environmental effects of the plan's or programme's implementation.</p>	<p>The draft monitoring framework is set out in Section 10</p>

# 3 The content of the Waltham Forest Local Plan

The LBWF's existing Local Plan (Core Strategy 2012-2026) sets out how and where development in the borough will be delivered in the future and is currently made up of the following documents:

- **Core Strategy** (adopted March 2012) -the overarching policy document which sets out the broad policy framework for all other supporting Local Plan documents as well as the planning vision for the Borough;
- **Development Management Policies** (adopted 2013) – sets out detailed policies for the management of development and is accompanied by a Policies Map;
- **Site Specific Allocations** – which identifies sites for particular types of development or use;
- **Area Action Plans** – including Blackhorse Lane, Northern Olympic Fringe, Walthamstow Town Centre and Wood Street;
- **North London Waste Plan** – sets out in partnership with other London boroughs the planning framework for waste management.

A new Local Plan is now needed as the population in Waltham Forest is expected to grow by 24% by 2033 and the Council has aspirations for growth, including significant new housing and sustained economic growth, to provide jobs for local people and increase the supply of housing, including affordable units as well as delivering infrastructure.

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

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

The Council has consulted on a new Local Plan 'Direction of Travel' (Issues and Options) document that sets out the challenges and opportunities for the borough, growth options and policy directions. Public consultation was undertaken during the period 8<sup>th</sup> November to 22<sup>nd</sup> December 2017. The Council is currently developing its evidence base to support the new plan and this Sustainability Appraisal Report will accompany the draft Local Plan.

## 3.1 Description of the Plan

The SEA Regulations require information on:

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

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

Once adopted, the new Local Plan will replace the Core Strategy (2012), Development Management Policies Document (2013), Walthamstow Town Centre Area Action Plan (2014) and Blackhorse Lane Area Action Plan (2015), with a single Local Plan, supported by a series of Supplementary Planning

Documents, Neighbourhood Plans (as may be prepared) masterplans, and planning briefs. This draft Local Plan will shape developments and guide neighbourhood plans and decisions on the location, amount and types of development the Borough requires to meet local needs and accommodate sustainable good growth.

## 3.2 Plan Vision and Objectives

The Local Plan sets out the vision and strategic priorities for development of the borough over the next 15 years. The LWBF Vision as set out in the Local Plan is:

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

There are 12 strategic objectives that will deliver the vision for Waltham Forest by 2035, these are:

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

## 3.3 Overview of the Plan Area

Waltham Forest is an outer London Borough in the North East of London and is one of the greenest Boroughs in London. The Local Plan area is shown in Figure 2 below.

The North Circular Road (A406) divides the Borough into two main areas. The London Borough of Waltham Forest was created in 1965 by the amalgamation of the Essex boroughs of Chingford, Walthamstow and Leyton. The Borough is predominantly residential with retail centres, areas of industry

and a total of 1205ha of open space, parks and playing fields. The Green Belt in the borough is part of the Metropolitan Green Belt which surrounds London.

The southern parts of the Borough comprise Leyton, Leytonstone and Walthamstow and the northern parts comprise Chingford and Highams Park.

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



# 4 Review of Other Programmes and Plans

## 4.1 Introduction

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

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

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

For practical reasons the scoping task of identifying related plans and programmes cannot yield an exhaustive or definitive list of legislative/non-legislative documents. The review has been focussed to ensure that only policies that are current and of direct relevance to the Local Plan are reviewed. A detailed outline of the policy documents, the objectives and the targets reviewed is set out in Appendix B. Table 7 outlines the key messages of the PPP.

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

## 4.2 PPP Review - Summary of Key Messages

Table 7 sets out the key messages drawn from the review of PPP. The messages presented in Table 7 are reflected within the detailed SA Framework which can be found in Table 7.

**Table 7: Key messages from the PPP review**

SA Topic	Key Messages from Review
Population	<ul style="list-style-type: none"> <li>• Ensure an integrated approach to housing and community facilities and services.</li> <li>• Provide opportunities for members of the community to mix and meet.</li> <li>• Play spaces are attractive, welcoming, engaging and accessible for all local children and young people.</li> <li>• Ensure social equality and prosperity for all.</li> <li>• Prevent and reduce homelessness.</li> <li>• Ensuring that all Borough residents have fair access to suitable accommodation, education, health and welfare provisions.</li> </ul>
Human Health	<ul style="list-style-type: none"> <li>• Optimise the health and wellbeing of people in Hertfordshire throughout the course of their lives.</li> <li>• Promote healthier lifestyles.</li> <li>• Increase physical activity levels.</li> <li>• Contribute to the improvement of health and quality of life.</li> <li>• Improve public health by strengthening local activities which connect people with nature.</li> </ul>

SA Topic	Key Messages from Review
	<ul style="list-style-type: none"> <li>• Ensure everyone has access to local, good quality health and social care services that meet their needs, especially children, older people and those living in more deprived areas.</li> <li>• Support policies for the protection of existing open spaces and provision for new open spaces, sports and recreational facilities.</li> <li>• Ensure that there are appropriate facilities for the disabled and elderly.</li> <li>• Improve participation in sports. Improve access to high quality open spaces and opportunities for sport and recreation in order to contribute to the health and well-being of communities.</li> </ul>
Economy	<ul style="list-style-type: none"> <li>• Raise the economic performance of the Borough by supporting existing businesses, attracting inward investment and encouraging new businesses start-ups.</li> <li>• Support small businesses.</li> <li>• Support the sustainable growth and expansion of all types of business and enterprise.</li> </ul>
Employment and Skills	<ul style="list-style-type: none"> <li>• Support opportunities for the improvement of the skills and educational attainment levels of the Borough's labour supply.</li> <li>• Protect and strengthen apprenticeship schemes.</li> <li>• Ensure that there is an adequate supply of employment land to meet local needs.</li> <li>• Create jobs and prosperity to meet the twin challenges of global competition and of a low-carbon future.</li> </ul>
Transport	<ul style="list-style-type: none"> <li>• Prioritise walking, cycling and public transport.</li> <li>• Enhance accessibility to key community facilities, services and jobs for all.</li> <li>• Create a more reliable, less congested and better-connected transport network.</li> <li>• Encourage sustainable transport and reduce the need to travel.</li> <li>• Reduce greenhouse gas emissions from transport.</li> <li>• To develop a transport system that provides access to employment, shopping, education, leisure and health facilities for all, including those without a car and those with impaired mobility.</li> <li>• To ensure that the transport system contributes towards improving the efficiency of commerce and industry and the provision of sustainable economic development in appropriate locations.</li> <li>• To mitigate the effect of the transport system on the built and natural environment and on personal health.</li> <li>• Support the expansion of electronic communications networks, including telecommunications and high-speed broadband.</li> <li>• Incorporate facilities for charging plug-in and other ultra-low emission vehicles.</li> <li>• Create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establishing home zones.</li> <li>• Promotion of walking and cycling as a healthy and more preferable options to car for local journeys.</li> </ul>
Crime and Safety	<ul style="list-style-type: none"> <li>• Reduce crime including the fear of crime.</li> <li>• Reduce anti-social behaviour.</li> <li>• Deliver safe and secure networks of green infrastructure and open space.</li> </ul>
Housing	<ul style="list-style-type: none"> <li>• Enable housing growth and deliver a mix of high-quality housing to meet local needs.</li> <li>• Deliver high quality, adequately size and thermally efficient housing; at a location that allows access to community facilities.</li> <li>• The NPPF requires the Local Plan to seek to deliver the full Objectively Assessed Housing Need (OAHN) of the area for market and affordable housing and identify a five year supply of deliverable sites to meet the identified need.</li> <li>• Ensure that housing growth requirements are accommodated in the most sustainable way.</li> </ul>

SA Topic	Key Messages from Review
	<ul style="list-style-type: none"> <li>● Priority to address the housing needs of older people and small households.</li> <li>● Improve the condition and management of existing housing.</li> <li>● Prevent and reduce homelessness.</li> <li>● Investigate options to expand the portfolio of temporary accommodation in the Borough.</li> </ul>
Townscape and Heritage	<ul style="list-style-type: none"> <li>● Conserve and enhance nationally and locally designated cultural and historical assets as well as those which are undesignated.</li> <li>● Maintain and enhance access to cultural heritage assets.</li> <li>● Respect, maintain and strengthen local character and distinctiveness.</li> <li>● Improve the quality of the built environment.</li> <li>● Preserve and enhance Conservation Areas.</li> <li>● Ensure that developments establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit.</li> <li>● Protect and enhance the quality and distinctiveness of natural landscapes and townscapes, in ways that allow it to continue to evolve and become more resilient to the impacts of climate change and other pressures.</li> <li>● Promote high quality design that respects and enhances local character.</li> <li>● Ensure that developments function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development.</li> </ul>
Climate	<ul style="list-style-type: none"> <li>● Build resilience to climate change and flood risk.</li> <li>● Safeguard functional floodplain and areas for future flood alleviation schemes.</li> <li>● Avoid development in areas of flood risk.</li> <li>● Improve flood awareness and emergency planning.</li> <li>● Enhance and restore the river corridor.</li> <li>● Promote the use of Sustainable Drainage Systems (SDS).</li> <li>● Ensure that all residents are informed of the potential risk of flooding and their appropriate flood evacuation route.</li> <li>● Minimise the effects of climate change.</li> <li>● Encourage the implementation of sustainable land management techniques to reduce the impact of extreme weather events</li> <li>● Reduce emissions of greenhouse gases that may cause climate change.</li> <li>● Improve energy efficiency in homes as well as helping businesses improve their energy productivity.</li> <li>● Encourage the provision of renewable energy.</li> <li>● Move towards a low-carbon economy.</li> <li>● Increase energy efficiency.</li> <li>● Manage water use.</li> </ul>
Air Quality	<ul style="list-style-type: none"> <li>● Ensure that air quality is maintained or enhanced and that emissions of air pollutants are kept to a minimum and meet agreed air quality targets and objectives.</li> </ul>
Soil and Geology	<ul style="list-style-type: none"> <li>● Remediate land contamination.</li> <li>● Protect soil quality and avoid soil pollution.</li> <li>● Encourage the use of previously developed (brownfield) land.</li> <li>● Promote the re-use of derelict land and buildings.</li> </ul>
Water	<ul style="list-style-type: none"> <li>● Reduce the pollution of groundwater and prevent or limit the entry of pollutants.</li> <li>● Protect and enhance surface and groundwater quality.</li> <li>● Improve water efficiency.</li> <li>● Return watercourses to a more natural state, increasing the biodiversity value and generating Water Framework Directive improvements.</li> <li>● Ensure that water quality is improved or maintained where possible.</li> <li>● Promote sustainable and water efficient development.</li> </ul>
Biodiversity	<ul style="list-style-type: none"> <li>● Protect and enhance biodiversity, including designated sites, priority species, habitats and ecological networks.</li> </ul>

SA Topic	Key Messages from Review
	<ul style="list-style-type: none"> <li>• Need to recognise the wider benefits of ecosystem services; minimise impacts on biodiversity and provide net gains in biodiversity where possible.</li> <li>• Support is needed to achieve local BAP targets.</li> <li>• Creation of more resilient ecosystems, through better management of habitats by making them bigger and more joined up.</li> <li>• Prevention, control and eradication of invasive non-native species, especially those that will have the most detrimental effects on biodiversity.</li> <li>• Identify opportunities for green infrastructure provision, recognising the multiple functions that green infrastructure provides to the area.</li> <li>• Ensure that any new development will not harm nature conservation interests, unless the benefits of development at that location clearly outweigh the harm caused.</li> <li>• Conserve riparian landscapes and habitats.</li> <li>• Increase tree cover within urban areas.</li> <li>• Reduce the direct pressures on biodiversity and address the underlying causes of biodiversity loss.</li> <li>• Create or restore areas of wildlife-rich habitat outside the protected site network.</li> </ul>
Landscape	<ul style="list-style-type: none"> <li>• Protect and enhance the quality and distinctiveness of natural landscapes and townscapes, in ways that allow it to continue to evolve and become more resilient to the impacts of climate change and other pressures.</li> <li>• There are major economic benefits to be gained from natural capital and their value should be incorporated into decision-making.</li> <li>• Conserve and enhance the green infrastructure of the Borough. Increase green connectivity for people and for wildlife, creating enhanced links to existing green infrastructure assets, including lateral links across town.</li> </ul>
Waste	<ul style="list-style-type: none"> <li>• Minimise pollution and other adverse effects on the local and natural environment.</li> <li>• Ensure waste is managed in line with the waste hierarchy: prevent, reuse, recycle, then other methods.</li> </ul>

# 5 Summary of Baseline Data

The detailed baseline is contained within Appendix A. This section outlines a summary of the information contained within this appendix, presented by SA topic.

## 5.1 Population

### 5.1.1 Introduction

Waltham Forest is a densely populated borough in outer London. It is home to a total of 271,200 people, who make up 96,900 households<sup>13</sup>, in a total area of 15 square miles. It has seen large population growth over the past 10 years, with a social profile that makes up one of the youngest and ethnically diverse populations in the country.

### 5.1.2 Likely Future Conditions

The population of Waltham Forest is expected to continue to increase and at a faster rate than previously predicted. The current trend of growth of all ethnic groups is expected to continue.<sup>14</sup> The revised ONS subnational population estimates put Waltham Forest in the top five local authorities in the country for the largest positive percentage difference between the actual and predicted population estimates<sup>15</sup>. The population of Waltham Forest in 2011 was 12.5% higher than previously predicted. The overall increase in population between 2011 and 2021 is now projected to be around 32,614, a 12.6% increase<sup>16</sup>.

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

### 5.1.3 Sustainability Issues

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

- As the population continues to increase so does the demand for housing, infrastructure, facilities and employment.
- The population density within the Borough exceeds both the London and the national averages.
- There is a need to create high quality places to live, work and recreate that are mixed and well-balanced in terms of tenure and income.
- Adequate support and facilities for older residents, including independent living, has been noted in particular to be needed.
- There is a need to build on the Borough's arts, culture and sport strengths across the Borough's diverse and changing population.
- There is a need to provide inclusive services; promote equal opportunities; oppose discrimination, intolerance and disadvantage through reducing inequalities and promoting community cohesion.
- There is a need to reduce the number of older people who feel socially isolated, by getting them actively participating in community life.

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<sup>13</sup> Waltham Forest Statistics about the Borough (ONS GLA Round 2012 Trend Based Population Projections, 2015)

<sup>14</sup> GLA ethnic demographic projections.

<sup>15</sup> ONS Population Estimates for England and Wales, Mid-2002 to Mid-2010 Revised (Subnational), 30 April 2013

<sup>16</sup> Waltham Forest Joint Strategic Needs Assessment (JSNA) Refresh 2014/15

### 5.1.4 Data Gaps

There are a number of emerging Council strategies including the priorities set by the new Leader of the Waltham Forest Council, a new mental health promotion strategy, the sport and leisure strategy, Playing Pitch strategy and the drug and alcohol strategy. These strategies will be reviewed, once available, and any relevant objectives and targets incorporated into the SA baseline at a future date.

## 5.2 Human Health

### 5.2.1 Introduction

The World Health Organisation define health as 'a state of complete physical, mental and social well-being and not merely the absence of disease or infirmity'<sup>17</sup>. In Waltham Forest over 80% of the population regard themselves to be in either 'good' or 'very good' health. Despite this, the Borough suffers from high levels of deprivation and health inequalities; ranking as the 6<sup>th</sup> worst London borough in regards deprivation<sup>18</sup>.

### 5.2.2 Likely Future Conditions

As the Waltham Forest population ages, the demand for health and social care needs will increase. By 2031, 42% of all people aged over 50 are projected to be from a minority ethnic background, which are at a greater risk of developing cardiovascular disease compared to the general population<sup>19</sup>. People aged 60 and over living with a life limiting condition is projected to rise by almost 30% by 2030<sup>20</sup>.

Life expectancy is on the rise and infant mortality has dropped below the national average. However, there are still substantial disparities in health across the Borough. In some of the most deprived areas, life expectancy is 5.3 years lower for men and 5.5 years lower for women than in the least deprived areas. This gap may well widen over time if levels of deprivation, overcrowding and poverty continue to rise. This is already being seen with TB, which is predominantly concentrated around the Borough's most deprived wards.

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

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

### 5.2.3 Sustainability Issues

The following sustainability issues have been identified:

- Currently a large proportion of the population are aged over 50 and this is projected to rise over the next 20 years (+26% rise by 2021<sup>21</sup>).
- Inequalities in health and life expectancy between ethnic groups.
- Disparities between wards, particularly between the north and south of the Borough;
- Improve life expectancies through promoting healthy lifestyles for all ages.

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<sup>17</sup> World Health Organisation (1948) Preamble to the Constitution of the World Health Organisation

<sup>18</sup> Age UK Waltham Forest Profile: Deprivation in Waltham Forest: 08/01/2013

<sup>19</sup> Waltham Forest Joint Strategic Needs Assessment 2014/2015

<sup>20</sup> Age UK Waltham Forest Profile: Deprivation in Waltham Forest, 08/01/2013

<sup>21</sup> GLA, 2015 Population projections

- Need to ensure adequate access to green spaces and recreational facilities to promote active and healthy lifestyles.
- Promote high quality housing with a range of tenures to reduce health issues which arise from poor quality accommodation.
- Need to increase recognition of the growing evidence of a relationship between physical and mental health.
- Need to increase levels of active travel throughout the borough in order to increase physical activity levels and tackle poor air quality.
- Need to ensure that hospitals have fit for purpose facilities (i.e. less converted houses) that meet the needs of patients.

#### 5.2.4 Data Gaps

Since the 2001 census the categories for quantifying people's health have changed. The addition of more categories has made it difficult and less accurate to compare. There have also been some difficulties in obtaining yearly data for cases of TB.

### 5.3 Economy

#### 5.3.1 Introduction

Much of East London, including Waltham Forest, suffered badly as a result of the 2008 recession. However, as one of the London Olympic host boroughs, Waltham Forest has had significant investment from Olympic legacy projects, such as the National Construction College in Leyton. It recently became the fastest growing Borough in London; seeing substantial growth in the number of both jobs and business. According to the 2016 UK Business Counts, Waltham Forest currently has a total of 9,940 businesses, over a thousand more than in 2015 (8,910), of which 93% employ fewer than 10 people <sup>22</sup>.

In 2016, Waltham Forest published their Economic Growth Strategy, which sets out plans for investment, growth and regeneration up until 2020. These are based around five key areas:

- Business growth;
- Increasing investment within town centres;
- Support housing growth;
- Increasing employment opportunities and ensuring people have adequate skills; and
- Ensuring that infrastructure supports growth and provides new facilities across the Borough.

#### 5.3.2 Likely Future Conditions

If current rates of growth continue, Waltham Forest may have an additional 26,000 jobs and 5,400 new businesses by 2020, causing an uplift in revenue from business rates. The sector mix of the local economy may be beginning to shift from traditional sectors such as industry, manufacturing and retail to creative, digital and technical sectors. If productivity increases to the London level (+11%)<sup>23</sup> it will allow the Borough's businesses to better compete with the wider economy. There may be increasing demands on current industrial areas due to population growth and demand for housing.

#### 5.3.3 Sustainability Issues

The following sustainability issues have been identified:

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<sup>22</sup> UK Business Counts 2016, Office for National Statistics and <https://www.walthamforest.gov.uk/content/statistics-about-borough>

<sup>23</sup> Waltham Forest Economic Growth Strategy, 2016-2020

- Action is needed to provide more support for business start-ups because only 71% of new businesses in the Borough survive more than 2 years.
- Ensure that ongoing business growth becomes a driver of productivity and fairer wages (e.g. encouraging the London Living Wage), in order to create an increase in the overall prosperity of the Waltham Forest Borough.
- Continue to support the Upper Lee Valley Development Opportunity Area and celebrate its industrial heritage.
- Support development of successful neighbourhoods.
- Need to ensure that growth supports the delivery of vital infrastructure and new facilities across the borough.
- Further action is needed in order to support and promote retail, business, cultural, leisure and residential investment in town centres.
- There are likely to be ongoing pressures on industrial sites, need to maintain industrial uses and promote strong local base of small businesses.
- Need to provide additional workspaces and promote denser, mixed use development with no net loss of business floor space.

### 5.3.4 Data Gaps

A number of studies and strategies are currently being prepared, including:

- Retail and town centre study;
- Upper Lee Valley Opportunity Area Framework;
- “City in the East” proposals by GLA; and
- Business and Premises audit for Strategic Industrial Locations (SILs) and Borough Employment Areas (BEAs).

Once available, these will be reviewed and taken into account in the SA as appropriate.

## 5.4 Employment and Skills

### 5.4.1 Introduction

According to the ONS’s Annual Population Survey<sup>24</sup>, 2016 saw over 139,200 of Waltham Forest’s residents in employment; some 74.7% compared with 73.8% for London and 74% for Great Britain. The median earnings of those working full time in Waltham Forest has increased 4% from 2015 to £30,900 but remains below the London average of £33,800.

### 5.4.2 Likely Future Conditions

There has been substantial employment growth in the Borough between 2011-2016 and if this continues, 26,000 new jobs could potentially be created. Unemployment rates have fallen and there are now fewer claimants of Job Seeker’s Allowance. Ongoing support of the ‘Steps into Work’ campaign by the Borough Council, which focuses on engaging those who are economically inactive / or are long term unemployed should help to continue this downward trend of unemployment through to 2020. However, without more support, the disparities in employment between wards may continue to widen.

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

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<sup>24</sup> ONS Annual Population Survey, 2016. Available at <https://www.nomisweb.co.uk/reports/lmp/la/1946157278/report.aspx?town=Waltham%20Forest#tabempunemp>. Accessed 3/7/17

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

### 5.4.3 Sustainability Issues

The following sustainability issues have been identified:

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

### 5.4.4 Data Gaps

A new employment land study is being undertaken on behalf of the Borough Council. Once available, it will form part of the Local Plan evidence base and any relevant information contained within it will be taken into account with the SA.

## 5.5 Transport

### 5.5.1 Introduction

Excessive road traffic leads to congestion, air and noise pollution, and contributes further to climate change. In 2016, 324.3 billion vehicle miles<sup>25</sup> were travelled on Great Britain's roads; this is 1.7% higher than the previous year and marks a new record level. Government policy is focusing on promoting sustainable transport and encouraging walking and cycling for those journeys where these are realistic alternatives.

Waltham Forest has many transport links. Despite these links the Borough is highly dependable on private car usage; in fact, one in five journeys in the Borough each weekday morning and afternoon, involves a trip to and from school. This means an additional 5,000 to 6,000 car journeys are made during peak times, even though the vast majority of school trips are less than a mile<sup>26</sup>.

### 5.5.2 Likely Future Conditions

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

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<sup>25</sup> Department for Transport, Provisional Road Traffic Estimates Great Britain: April 2016 - March 2017

<sup>26</sup> Walk, Cycle, Enjoy, Waltham Forest, Stats & Facts, <http://www.enjoywalthamforest.co.uk/stats-and-facts/> Accessed on: 19/05/2017

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

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

### 5.5.3 Sustainability Issues

The following sustainability issues have been identified:

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

### 5.5.4 Data Gaps

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

## 5.6 Crime and Safety

### 5.6.1 Introduction

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

Over the past five years, crime rates have continued to decline in Waltham Forest and they now sit below the London average. In recent years, there has been a shift in types of crimes being committed, with a significant rise in reported cases of racist and religious hate crime.

### 5.6.2 Likely Future Conditions

Overall the number of reported crimes in Waltham Forest has decreased over the past 10 years, despite a slight rise last year, rates per 1000 remain below the London average. The increase in crime rates have

matched the national trend. There has been a considerable rise in racist and religious hate crime recently; without intervention this could worsen.

### 5.6.3 Sustainability Issues

The following sustainability issues were identified:

- Increase in racist and religious hate crimes;
- The percentage of residents in the Borough that are worried about crime remains higher than the London average;
- Need to provide safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life.
- Need to develop an approach to tackling crime, improving liveability and reducing anti-social behaviour.

### 5.6.4 Data Gaps

The lack of available GIS datasets made it difficult to be able to compare the crime rates at ward level in order to identify patterns.

## 5.7 Housing

### 5.7.1 Introduction

Waltham Forest is one of the fastest growing London Boroughs which is causing a shortage of homes and an increase in house prices<sup>27</sup>. Average house prices in Waltham Forest increased by 95% over the last five years and are higher than the average for England and Wales. However, average house prices in Waltham Forest remain lower than the average house prices across London. In March 2017, the average house in the Borough was 47% higher than the average in England and Wales<sup>28</sup>. The ratio of workplace-based earnings to house prices can be used to indicate affordability of house prices. Waltham forest has a higher ratio than the average for London indicating that it is less affordable for the current residents<sup>29</sup>. These changes have led to an increase in the proportion of rented properties instead of owner-occupied properties and an increase in homelessness in the area. These trends are mirrored in London<sup>27</sup>.

Within the built-up area of the Borough there is a significant difference between the northern and southern areas. The southern and central parts of the Borough are Victorian and Edwardian terraced houses. The northern section of the Borough generally has more open space and community facilities and the houses are built to higher specifications<sup>30</sup>.

A key problem is the shortage of housing in Waltham Forest, which has led to overcrowding as identified by a Housing Needs Survey conducted in 2012. The survey estimated that 11% of all dwellings and 17.6% of the private rental sector are overcrowded<sup>31</sup>. In response to this, the Council have set targets to increase the number of affordable and social housing constructed in Waltham Forest and there has been a decrease in the waiting list for affordable housing.

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<sup>27</sup> 'Building for the Future Delivering Housing for Everyone in Waltham Forest' LBWF 2015

<sup>28</sup> UK House Price Index

<sup>29</sup> 'Median and Lower Quartile Ratio of House Prices to Workplace-Based Earnings' DCLG <https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoresidencebasedearningslowerquartileandmedian>

<sup>30</sup> Waltham Forest Housing Strategy 2008-2028

<sup>31</sup> 'Waltham Forest Housing Needs Survey and Strategic Housing Market Assessment: Executive Summary' September 2012, Opinion Research Services

## 5.7.2 Likely Future Conditions

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

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

## 5.7.3 Sustainability Issues

The following sustainability problems have been identified:

- There is a disparity between the cost of housing and the amount that people are able to borrow to purchase a home, which means that many people are unable to access the property market.
- There is a shortfall in the provision of affordable housing to meet the requirements of those in housing need.
- 28% of households are unsuitably housed; there is a potential shortfall in the provision of family accommodation and there is overcrowding, primarily in the private rental sector.
- Homelessness is expected to increase.
- Need to offer greater quality, flexibility and choice to those who rent.
- Need to increase the supply of well-designed housing of all tenures.
- Need to introduce more flexible approaches for affordable housing contributions to encourage open market and mixed tenure specialist older people's housing.

## 5.7.4 Data Gaps

The SHMA is being updated at the time of writing. Once finalised, this evidence source will be used to inform the SA.

# 5.8 Townscape & Heritage

## 5.8.1 Introduction

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

Heritage is defined as those features which belong to the culture of a particular society, such as traditions, languages, or buildings, that were created in the past and still maintain their historical importance. UNESCO defines cultural heritage as the 'legacy of physical artefacts and intangible attributes of a group or society that are inherited from past generations, maintained in the present and bestowed for the benefit of future generations'<sup>32</sup>. Historic England defines a heritage asset as "A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset include designated heritage assets and assets

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<sup>32</sup> UNESCO, Tangible Cultural Heritage <http://www.unesco.org/new/en/cairo/culture/tangible-cultural-heritage/>  
Accessed on: 19/05/2017

identified by the local planning authority (including local listing)<sup>33</sup>. Heritage assets include archaeology and non-designated assets.

Preserving cultural and built heritage can benefit communities by providing an essential educational resource, giving residents a sense of identity as well as contributing to the national and local economy.

### 5.8.2 Likely Future Conditions

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

### 5.8.3 Sustainability Issues

The following sustainability issues have been identified:

- A number of listed buildings are identified as being in poor condition and are have been included on Historic England's Heritage at Risk Register. Opportunities exist to improve the condition of some listed buildings through development.
- Ensure that the Conservation Areas, Heritage Assets and features are preserved or enhanced.
- New developments should respect the urban and historic context, improve townscape and leave a positive architectural legacy.
- Impacts of future development on the local historic environment need to be considered.
- Heritage assets should be managed to sustain their significance.
- Ensure that everyone is able to participate in understanding and sustaining their local historic environment.
- Development could encroach on Conservation Areas and subsequently negatively affect townscape and heritage assets.

### 5.8.4 Data Gaps

Conservation Area Appraisals and Management Plans do not exist for all Conservation Areas within the Borough. The Borough's Archaeological Priority Areas are out of date and lack appropriate descriptions and justifications. Historic England has recommended that the LBWFC liaise with GLAAS over updating and improving the Local Plan heritage evidence base and that the local Historic Environment Record is consulted which is particularly relevant when site allocation options are considered.

## 5.9 Climate

### 5.9.1 Introduction

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

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

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<sup>33</sup> Historic England website: <https://historicengland.org.uk/advice/hpg/hpr-definitions/h/536274/>

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

### 5.9.2 Likely Future Conditions

In the report 'A Summary of Climate Change Risks for London'<sup>34</sup>, the likely effects of climate change on London are discussed. The following climatic changes have been predicted in the 2080s based on the medium scenarios:

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

Given the reliance on the private car as the main mode of transport within the Borough (see Section 8), ongoing increase in vehicle ownership and lack of vehicles meeting emissions standards, and the requirement for additional residential development (see Section 10), it could be considered likely that greenhouse gas emissions will rise in the future. However, there is the potential for advances in technological solutions and changes in policy to begin to stabilise and reduce emissions over time. Local policy reducing car-based development could affect this, as could the increasing use of electric vehicles. Despite this, the current estimates for temperature increases and changes to rainfall patterns are unlikely to alter significantly in the near future, given the timescales associated with climate change. This being the case, there will be an increasing need to implement climate change mitigation and adaptation measures in light of changing environmental conditions.

### 5.9.3 Sustainability Issues

The following sustainability problems have been identified:

- Reliance on the petrol or diesel-fuelled private car as the main mode of transport.
- Greenhouse gas emissions need to be stabilised and reduced over time.
- Need to provide electric vehicle infrastructure, such as charging points.
- Need to plan for and implement/facilitate climate change adaptation, in respect of rising temperatures, water scarcity and extreme weather events, particularly heavy rainfall/flooding.
- Need to continue to promote the construction of energy efficient buildings, and to support the installation of renewable and low or zero carbon technology.
- Need to plan and prepare for the expected impacts of unavoidable climate change by developing adaptation responses and building resilience.
- New developments need to minimise vulnerability and provide resilience to climate change.
- Need to work with communities to help tackle climate change.
- Help promote low carbon heat network.
- Need to identify opportunities for growth of the low carbon economy in the Upper Lee Valley.

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<sup>34</sup> 'A Summary of Climate Change Risks for London' Climate UK, 2012

## 5.9.4 Data Gaps

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

## 5.10 Air Quality

### 5.10.1 Introduction

Road traffic forms the principal source of air pollution in the Borough. Carbon monoxide (CO), oxides of nitrogen (NO<sub>x</sub>), volatile organic compounds (VOCs) and small particulate matter (PM<sub>10</sub>) are among the pollutants emitted from vehicle exhausts. These compounds can cause severe cardio-vascular and respiratory harm to people, especially in the long term, and also have adverse effects on the natural and built environment. The main pollutants of concern for Waltham Forest are Nitrogen Dioxide (NO<sub>2</sub>) and particulates of various sizes (PM). These pollutants are known to reduce life expectancy, cause cancer, and reduce lung function in children. Children, elderly and those with pre-existing conditions are most susceptible to air pollution.

### 5.10.2 Likely Future Conditions

It is likely that air pollution will continue to be an issue within the Borough given its proximity to the strategic road network. The NO<sub>2</sub> emissions have remained consistent, despite the introduction of schemes to discourage the use of private vehicles. Vehicle ownership is on the increase and vehicles continue to not meet the Euro Emissions Standards. Despite this, since monitoring began in the late 90's, the PM<sub>10</sub> concentration levels have also remained relatively consistent.

With the introduction of the Low Emission Zone, which excludes polluting vehicles from entering London, air quality is expected to improve, although early indications are showing no significant change in levels of the pollutants of concern. A potential explanation for this is that the changes in vehicle technology are actually increasing emissions of NO<sub>2</sub> and it is these increases in this source of primary NO<sub>2</sub> that is causing the exceedances at background monitoring locations. Other future conditions that may affect air quality are the increase in dispersed pollution sources such as commercial and residential boilers, diesel generators, Combined Heat and Power systems, energy networks, and use of biodiesel and biomass at commercial and residential sites <sup>35</sup>.

### 5.10.3 Sustainability Issues

The following sustainability problems have been identified:

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

### 5.10.4 Data Gaps

A new air quality action plan is forthcoming and will be taken into account in the SA when available.

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<sup>35</sup> Waltham Forest Air Quality Website - <https://www.walthamforest.gov.uk/content/air-quality>

## 5.11 Soil and Geology

### 5.11.1 Introduction

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

### 5.11.2 Likely Future Conditions

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

### 5.11.3 Sustainability Issues

The following sustainability problems have been identified:

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

### 5.11.4 Data Gaps

No data on existing contaminated land was identified.

## 5.12 Water

### 5.12.1 Introduction

Water resources and the provision of water infrastructure are also becoming of increasing concern in many areas, in response to increases in population. 5.2 million people in England and Wales are deemed to be at risk of flooding<sup>36</sup>. As the population rises the number of those at risk of flooding may also rise. Waterways offer a beneficial asset within an urban environment offering recreational activities, areas of open space as well as providing attractive places to live. In spite of this waterways in England are becoming increasingly polluted. Waltham Forest is no exception to this, with many of its lakes and reservoirs being severely polluted.

### 5.12.2 Likely Future Conditions

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

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<sup>36</sup> National Flood Forum, 2017

### 5.12.3 Sustainability Issues

The following sustainability issues were identified:

- Diffuse urban water pollution exists in local rivers and water bodies.
- High number of properties at risk at flooding and there is a need to promote flood resistance and resilience measures for these properties.
- Increasing population will put strain on water resources.
- Potential impacts of the Local Plan policies and site allocations on groundwater need to be identified and addressed.
- New development will need to incorporate SUDS to sustainably reduce flood risk.
- Need to promote the use of new technologies and innovation in flood mitigation measures.

### 5.12.4 Data Gaps

Following the changes to the climate change allowances the Strategic Flood Risk Assessment (SFRA) for LB Waltham Forest is in need of updating. It is anticipated that an updated SFRA will be available when site allocation options are assessed.

## 5.13 Biodiversity

### 5.13.1 Introduction

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

Whilst the majority of Waltham Forest is built up, the Borough benefits from open parkland, woodlands and reservoirs with 31%<sup>37</sup> of the land consisting of open greenspace. Preserving open green spaces in urban environments is crucial for providing habitats for nature as well as enhancing peoples' wellbeing.

### 5.13.2 Likely Future Conditions

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

### 5.13.3 Sustainability Issues

The following sustainability issues have been identified:

- Large areas of the SSSI sites are considered to be in either unfavourable with no change or an unfavourable and declining condition.
- Increases in population will cause a demand for more development, where there is a potential for loss of valuable habitats which have yet to be designated for nature conservation as a direct result.
- SSSIs and European sites within the Borough are under threat from poor air quality, recreational pressure and urban effects (including issues with litter).
- Support is needed to achieve local BAP targets.

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<sup>37</sup> Biodiversity in Waltham Forest, Report of Neighbourhoods Scrutiny Committee, December 2015

- Promote effective land-management to support, protect and enhance biodiversity.
- Consider and plan for the impacts of climate change on species and habitats.
- Encourage people to engage with the ownership, design, management, maintenance and use of their environment as part of their own vision for their neighbourhood.
- Protect and enhance the wildlife and habitats in Waltham Forest, in particular those of international, national and regional importance.
- Need to recognise the wider benefits of ecosystem services; minimise impacts on biodiversity and provide net gains in biodiversity where possible.
- Work to conserve and enhance the local environment.

#### 5.13.4 Data Gaps

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

## 5.14 Landscape

### 5.14.1 Introduction

Landscape character is defined as 'a distinct, recognisable and consistent pattern of elements in the landscape that makes one landscape different from another, rather than better or worse'<sup>38</sup>. Landscape gives a locality its sense of place, making it different from neighbouring localities.

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

### 5.14.2 Likely Future Conditions

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

### 5.14.3 Sustainability Issues

The following sustainability problems have been identified:

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

### 5.14.4 Data Gaps

None identified.

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<sup>38</sup> Landscape Character Assessment (2008) <http://www.landscapecharacter.org.uk/> Landscape Character Network

## 5.15 Waste

### 5.15.1 Introduction

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

At present, over half of the rubbish generated in North London is sent for disposal outside of London million with over 70% of this going to landfill<sup>39</sup>. There is a real need to reduce waste generation and for it to be managed in a more sustainable way, with an emphasis on reuse, recycling and recovery. Waltham Forest is working together six other North London Boroughs to produce a North London Joint Waste Strategy.

### 5.15.2 Likely Future Conditions

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

### 5.15.3 Sustainability Issues

The following sustainability issues have been identified:

- The amount of waste produced is reducing but still exceeds both the London and national average.
- The London Plan encourages greater self-sufficiency for waste management in London and sustainable transportation of waste.
- Recycling is increasing but continues to fall short of government targets.
- Need to minimise the impact of municipal waste management on the Borough's environment.
- Need to reduce the carbon footprint of municipal waste.
- Need to ensure that all waste is managed in the most environmentally friendly way.

### 5.15.4 Data Gaps

None identified.

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<sup>39</sup> North London Waste Plan (Draft), 2015

# 6 Alternative Options

## 6.1 Introduction

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

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

A RAG (Red, Amber, Green) rating was performed where GIS data was available against each SA objective. Spatial baseline data, supplied by Waltham Forest Borough Council in the form of GIS files, was used to inform this assessment. All sites were assessed in accordance with the thresholds set out in Table 3.

## 6.2 SA of Strategic Options

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

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

**Table 8: Direction of Travel Options Appraised**

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

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

Table 9: A summary of the potential significant and uncertain effects for the Strategic Growth Options

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

Table 10: Summary of the potential significant and uncertain effects of the Policy Direction Options

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

Option	Potential Significant Effects
3. Ensuring efficient use of land by densifying and intensifying new and existing employment uses and jobs, including a review of how employment uses can be layered with other uses.	The appraisal recorded some uncertain potential significant negative effects resulting from development, such as in relation to greenhouse gas emissions (SA7), local distinctiveness (SA16), the historic (SA17) and energy use (SA8).
4. Promoting employment uses as part of mixed use schemes.	No potential significant effects identified.
5. Supporting the delivery of affordable and connected workspace.	No potential significant effects identified.
6. Encouraging the development of creative enterprise zones.	No potential significant effects identified.
7. Supporting the delivery of employment training opportunities through the planning system.	No potential significant effects identified.
<b>Providing Physical Infrastructure</b>	
1. Supporting the delivery of digital infrastructure in the Borough.	No potential significant effects identified.
2. Supporting the delivery of required utilities in the Borough.	Uncertain negative effects could potentially occur in relation to heritage assets (SA17) and the natural environment (SA13) but effects would be dependent on the location and nature of any developments proposed.
3. Ensuring sufficient waste sites within the Borough and opportunities to improve them.	Potential uncertain negative effects are also identified if new waste sites are developed in relation to heritage assets (SA17) and the natural environment (SA13) but effects would be dependent on the location and nature of any developments proposed.
4. Supporting the delivery of on-site utilities and waste facilities on major sites.	No potential significant effects identified.
5. Ensuring residents have access to sustainable and accessible transport.	No potential significant effects identified.
6. Supporting transport improvements that increase capacity, and improve user experience.	Potential uncertain significant negative effects could occur in relation to the loss of soil resources (SA12) and generation of construction waste (SA6). Potential uncertain minor negative effects are also recorded in relation to biodiversity and the natural environment (SA13), integrity of SSSI and Natura 2000 sites (SA14) and heritage assets (SA17) but effects would be dependent on the location and nature of any developments proposed.
<b>Meeting Social and Community Infrastructure Needs</b>	
1. Safeguarding all existing social and community infrastructure facilities including educational and health.	Potential significant positive effects have been identified in relation to health and wellbeing (SA3) and community cohesion (SA4).

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

Option	Potential Significant Effects
6. Creating distinctive retail centres - each with a unique 'offer' in terms of their place setting and encouraging a greater degree of differentiation and specialisation between them.	It is uncertain whether creating distinctive retail centres will bring social / community benefits (SA4) and it is uncertain whether specialisation of retail in certain parts of the Borough would reduce accessibility (SA5) and affect local distinctiveness (SA16).
7. Proactively managing the proliferation of particular types of actives likely to make people unhealthy e.g. betting shops and hot food takeaways shops.	No potential significant effects identified.
<b>Growing Our Culture and Visitor Attractions</b>	
1. Supporting the development of the cultural and creative sectors through grouping of such activities at appropriate locations e.g. cultural clusters or quarters.	An uncertain minor positive effect is identified because this option could support the vitality of town centres (SA18). An uncertain effect is identified (SA4) because it is uncertain whether clustering cultural facilities / attractions would increase access to such facilities for residents. It could reduce access to new facilities if these were clustered in a limited number of places across the Borough. It is uncertain that creating clusters would increase access by sustainable transport modes (SA5). Clusters should be directed to locations with good sustainable transport access.
2. Encouraging the provision of community spaces for local events and festivals.	No potential significant effects identified.
3. Promoting cultural uses in designated centre e.g. galleries and performance spaces.	No potential significant effects identified.
4. Working with developers and other stakeholders to encourage more public art and culture within developments e.g. public art, music venues, cinemas and theatres.	No potential significant effects identified.
5. Supporting the provision of visitor accommodation within the Borough.	An uncertain minor positive effect is identified because the option could increase air pollution from transport, depending on where new visitor accommodation is located in the Borough (SA9).
6. Supporting a thriving evening economy across the Borough.	No potential significant effects identified.
7. Working to secure more public art and culture through planning obligations	No potential significant effects identified.
<b>Creating High Quality Places</b>	
1. Continuing to support high quality and inclusive design in the public realm and development through our Design Review Panel and using current industry standards in design.	There is some uncertainty surrounding SA17 (historic built environment) and without policy direction option 5, this option could lead to some new developments not respecting local character and distinctiveness.

Option	Potential Significant Effects
2. Promoting active living environments through connectivity and walkability in and between developments.	An uncertain minor positive effect has been identified in relation to biodiversity and the natural environment, as it is not certain that more green spaces would be created.
3. Supporting the use of Designing Out Crime principles to reduce anti-social behaviour and the fear of crime in developments and in the public realm.	Potential significant positive effects have been identified in relation to crime reduction (SA2).
4. Encouraging appropriate density, scale, massing and height in development to reflect the character, local distinctiveness, and context of the Borough.	A potential significant positive effect is identified in relation to promoting local distinctiveness (SA16).
5. Considering where tall buildings may be appropriate in the Borough.	No potential significant effects identified.
6. Ensuring places are designed to promote positive amenity impacts and support the health and wellbeing of residents.	A potential significant positive effect has been identified in relation to health and wellbeing (SA3), as this option aims to create well designed places that promote improved access to amenities, whilst also supporting the health and wellbeing of the Borough's residents.
<b>Enhancing and Preserving our Heritage</b>	
1. Ensuring that new development respects heritage assets and their settings.	Potential significant positive effects are identified in relation to the conservation and enhancement of the historic built environment within the Borough (SA17).
2. Promoting heritage-led regeneration and seeking appropriate beneficial uses and improvements to historic buildings, spaces and areas.	Potential significant positive effects are identified in relation to the conservation and enhancement of the historic built environment (SA17) as well as the local distinctiveness and character of the Borough (SA16).
3. Promoting and encouraging access to the Borough's unique heritage offer as part of its arts and culture programme.	Potential significant positive effects are identified in relation to the conservation and enhancement of the historic built environment (SA17) as well as the local distinctiveness and character of the Borough (SA16).
4. Encouraging the restoration of heritage assets at risk or under threat.	Potential significant positive effects are identified in relation to the conservation and enhancement of the historic built environment (SA17) as well as the local distinctiveness and character of the Borough (SA16).
<b>Protecting and Enhancing our Environment</b>	
1. Continuing to resist the inappropriate loss of the Green Belt, Metropolitan Open Land and open spaces.	There is some uncertainty as to whether housing targets will be met through development outside of Green Belt, Metropolitan Open Land or open space areas and an uncertain effect is therefore identified for SA1. Significant positive effects have been identified in relation to biodiversity and the natural environment (SA13).
2. Supporting the provision of new open space in new development proposals.	Significant positive effects have been identified in relation to biodiversity (SA13), health and wellbeing (SA3) and SA15 (maintain and enhance the quality of the green belt and open space areas).

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

## 6.3 SA of Spatial Strategy Options

A Growth Capacity Study was completed in June 2018 on behalf of LBWF<sup>40</sup> which identified a range of potential development sites and their capacities for development across the Borough. This work has been used to identify a collection of 'growth clusters' across the Borough, forming a New Spatial Strategy based on the 'Combined Approach' option (Option 5) (referred to in Section 6.2), in order to meet challenging new housing need/targets.

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

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

- New Spatial Strategy; and
- Existing Spatial Strategy.

### 6.3.1 New Spatial Strategy Assessment

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

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<sup>40</sup> <https://walthamforest.gov.uk/content/evidence-base-development-plan-documents>

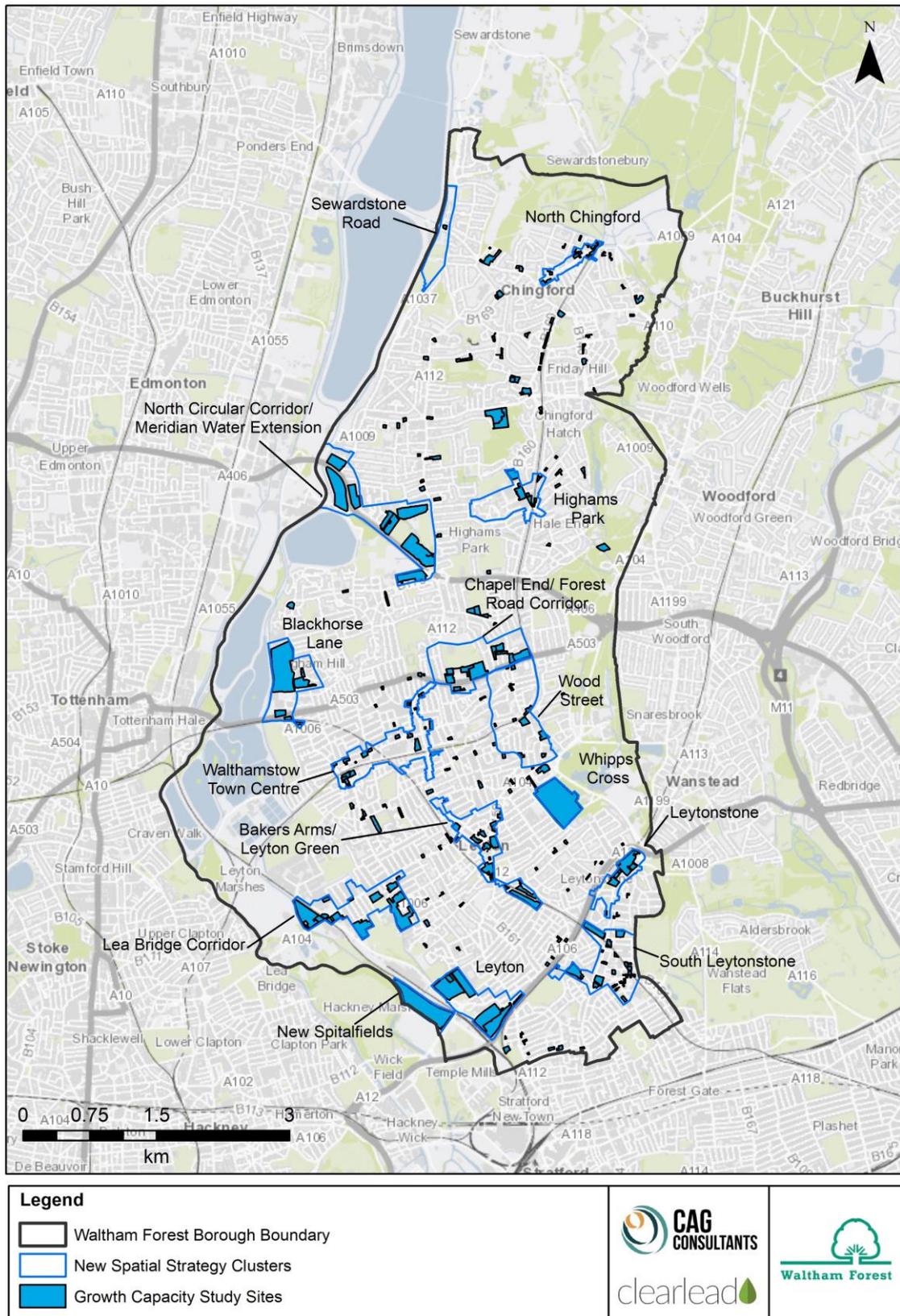


Figure 3: New Spatial Strategy

Figure 4 combines the potential effects of the individual growth clusters which form the New Spatial Strategy in order to present a graphical summary of the overall performance against each SA objective.

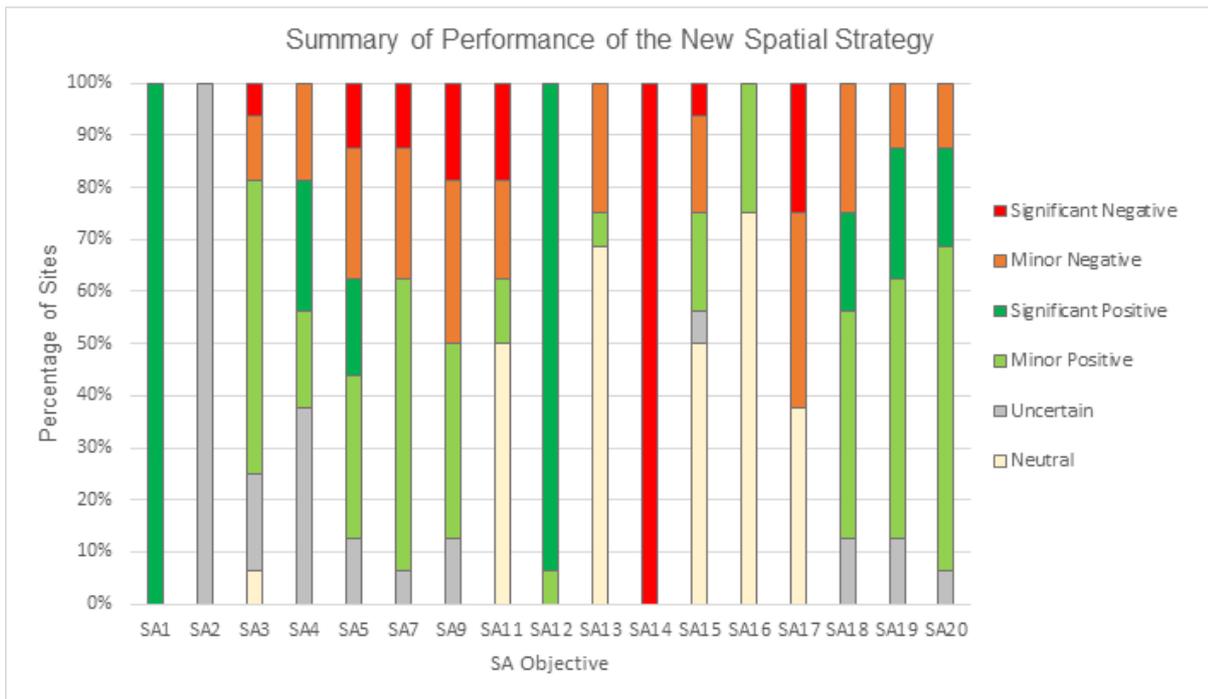


Figure 4: Summary Performance of the New Spatial Strategy

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

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

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

Significant negative effects were identified for all growth clusters in the New Spatial Strategy in relation to SA14 (SSSI and Natura 2000 sites). The HRA screening identified likely significant effects on European

sites could occur as a result of the strategy, particularly in relation to recreational pressure, air quality and water pollution and hydrological changes. These issues will need to be assessed within the separate Appropriate Assessment, the findings will inform the assessment of the draft Local Plan in due course.

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

Potential cumulative effects were identified in the assessments of the individual growth clusters as presented in Table 11 below.

**Table 11: Potential cumulative effects identified in the assessment of the New Spatial Strategy**

Cluster	Potential cumulative effects
Sewardstone Road	Potential negative cumulative effects in relation to SA7 (greenhouse gases) and SA9 (air quality).
Blackhorse Lane	Potential negative cumulative effects in relation to SA7 (carbon emissions) and SA9 (air quality).
Chapel End Forest Road Corridor	Potential negative cumulative effects in relation to SA7 (carbon emissions) and SA9 (air quality).
Whipps Cross	Uncertain potential cumulative effects have been identified for this area in relation to SA7 (carbon emissions) and SA9 (air quality).
North Circular Corridor / Meridian Water Extension	Potential negative cumulative effects in relation to SA7 (carbon emissions) and SA9 (air quality).
South Leytonstone	Potential negative cumulative effects in relation to SA7 (carbon emissions) and SA9 (air quality).
Lea Bridge Corridor	Potential negative cumulative effect in relation to SA9 (air quality).
New Spitalfields	Potential negative cumulative effects in relation to SA7 (greenhouse gases) and SA9 (air quality).
Lea Bridge Corridor, Leytonstone and Whipps Cross	Potential negative cumulative effect in relation to SA15 (green belt and open space).
Growth clusters in the central southern part of the Borough	Potential cumulative negative effects in relation to SA17 (historic assets) and SA16 (local distinctiveness).

### 6.3.2 Existing Spatial Strategy Assessment

It is considered reasonable that should the New Spatial Strategy not be taken forward then the spatial strategy set out within the existing Core Strategy would continue. Therefore, the SA has considered the potential effects of the Existing Spatial Strategy set out within the Core Strategy<sup>41</sup> (2012) as an alternative to the New Spatial Strategy.

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

It is a requirement of the SEA Directive that reasonable alternatives are assessed in the same level of detail as those options being put forward in the emerging plan. In light of this, the same methodology that was applied for the assessment of the new Spatial Strategy was used. In order to carry out the initial RAG assessment, all proposed Growth Capacity Study sites that fell within a Growth Area, Town, District or Neighbourhood Centre boundary (i.e. a cluster) were assessed. The RAG assessment was then used to inform the overall assessment of each of the clusters.

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

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

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<sup>41</sup> Waltham Forest Borough Council, Waltham Forest Local Plan – Core Strategy, 2012

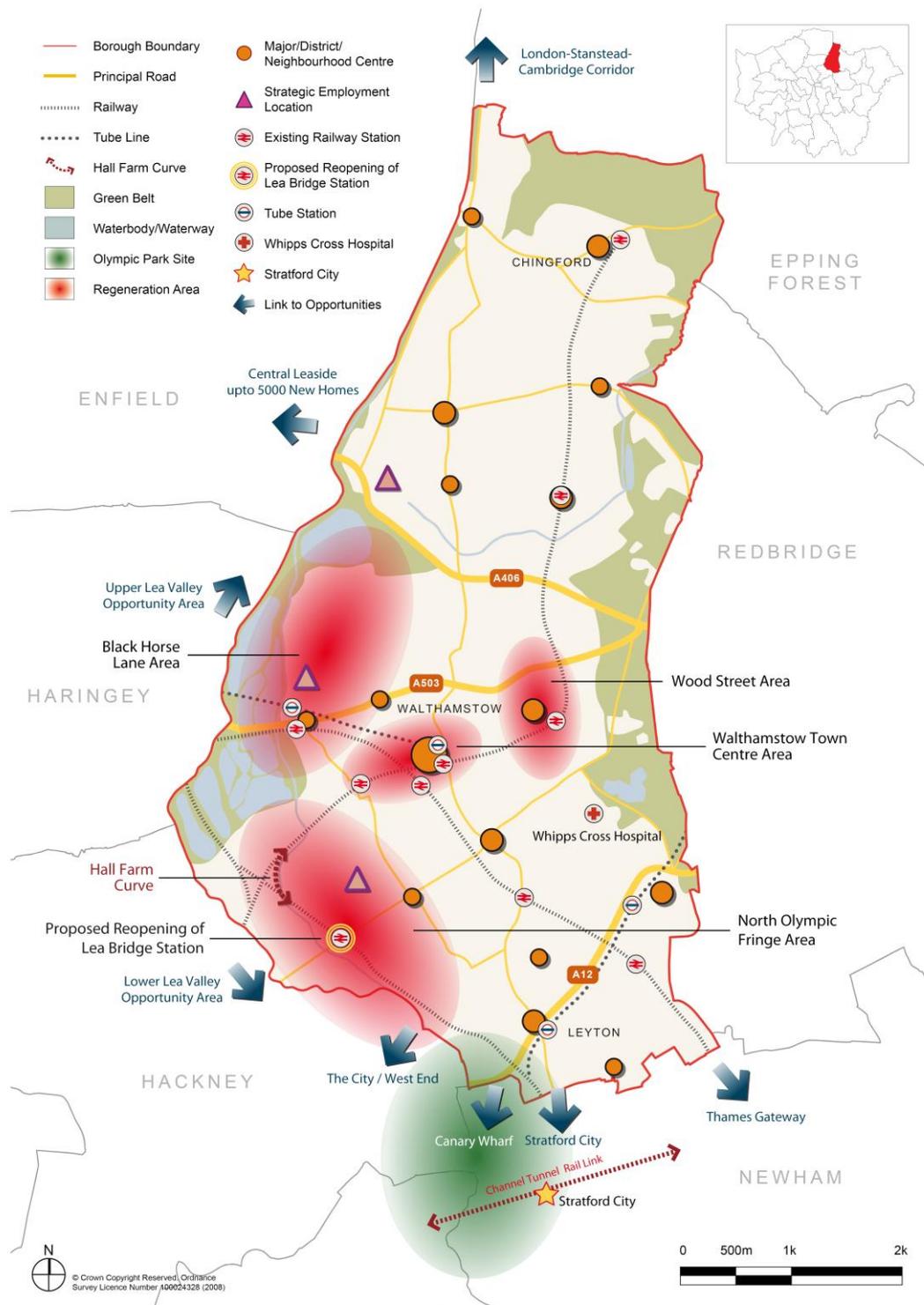


Figure 5: Existing Spatial Strategy within the Core Strategy

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

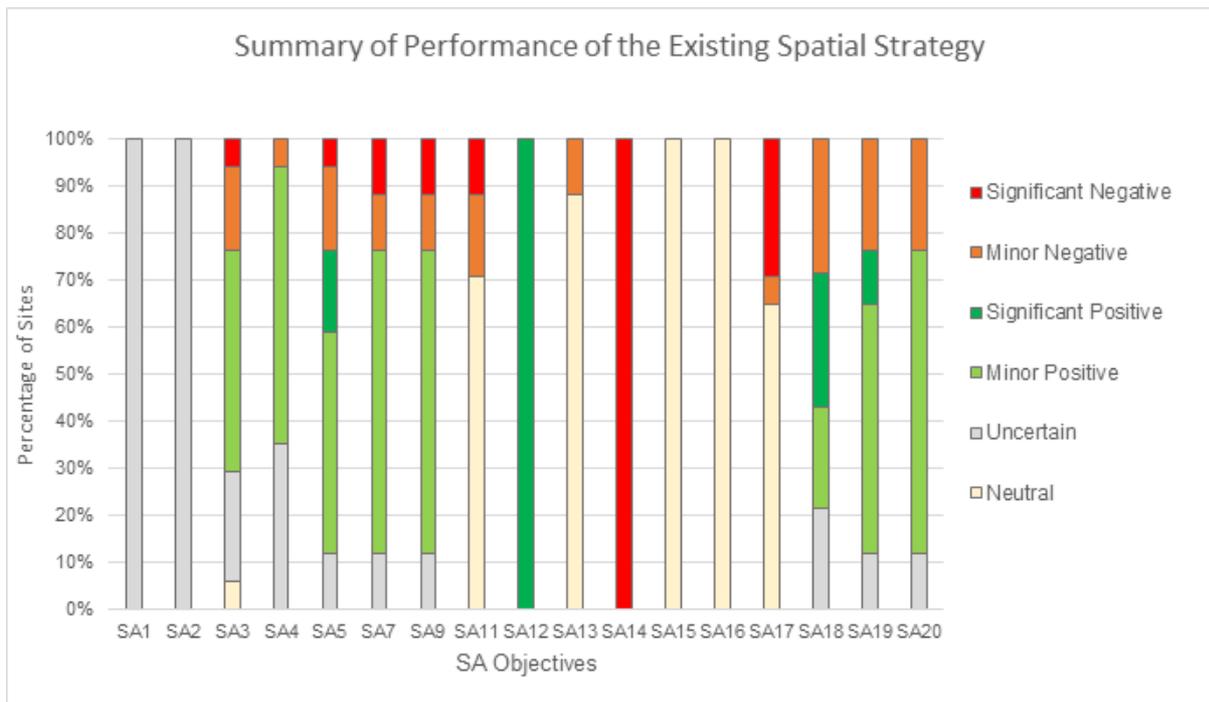


Figure 6: Summary Performance of the Existing Spatial Strategy

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

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

The Existing Spatial Strategy performed slightly better than the New Spatial Strategy with regards to accessibility by sustainable transport (SA5). Although the Existing Spatial Strategy consists of four main Growth Areas concentrating development to the south west and centre of the Borough it also directs development to a high number of Town, District and Neighbourhood centres which have good PTAL scores and this is likely to be the reason why the strategy performs relatively well with regards to accessibility. For the same reasons, the Existing Spatial Strategy also scored relatively well with regards to carbon emissions (SA7) and air quality (SA9). However, some potentially minor, significant and cumulative negative effects were identified in relation to these SA objectives. Potential increases in car use resulting from development in locations with poor access by sustainable transport could exacerbate existing sustainability issues identified within the SA baseline. Potential negative effects in relation to air quality and carbon emissions were identified in the far north and south of the Borough.

Most development in the Existing Spatial Strategy would not be located within areas at risk from flooding (SA11). However, 30% are located within Flood Zones 2 and 3. Eight potential development sites are located within Flood Zone 3 located within the Blackhorse Lane and Olympic Fringe Growth Areas. Potential significant negative effects were identified for these Growth Areas within the assessment. The majority of

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

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

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

**Table 12: Potential cumulative effects identified in the assessment of the Existing Spatial Strategy**

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

# 7 Assessment of Local Plan Policies

## 7.1 Introduction

This section presents the potential significant and uncertain effects of the policies contained within the Local Plan. These effects are presented in Tables 12-15 for the Spatial Strategy and in Tables 16-27 for the Thematic Policies.

All policies were subject to assessment against the SA Framework of objectives. Summaries of the significant effects (including uncertain effects) are provided in this section with reference to the SA objectives in Table 2. If a policy does not appear within the tables below, it is because that policy is not predicted to result in any significant effects (either positive, negative or uncertain). Mitigation measures put forward in the detailed assessments in Appendices C and D are presented in Section 9.

The assessment of Strategic Location Policies was also informed by the results of the RAG assessment for each location. This used GIS to add context and clear indication of the impacts which could arise from the current draft Local Plan in specific areas of the Waltham Forest. The methodology for this is described within Section 2.4 of this report. The RAG results are detailed within Appendix C, and significant and uncertain effects of each Strategic Location Policy are summarised within sections 7.3, 7.4 and 7.5.

## 7.2 Waltham Forest’s Spatial Strategy

Table 13: Summary of Potential Significant and Uncertain Effects for the Spatial Strategy

Local Plan Policy	Potential Effect	Potential Significant Effects Description
Policy 1: Presumption in Favour of Sustainable Development	Uncertain	SA14: The policy promotes sustainable development. It is not certain that development would not have an adverse effect on Natura 2000 sites and therefore an uncertain effect is identified.
Policy 2: Scale of Growth	Significant positive	SA1: The policy sets out the scale of growth across the borough and includes the net increase of housing to be planned for and provided which is 27,000 additional homes. The policy therefore supports the achievement of this objective and addresses key sustainability issues. It is considered to have a significant positive effect.
	Significant negative	SA14: The scale of development proposed by the policy has the potential for significant adverse effects on European sites.

Local Plan Policy	Potential Effect	Potential Significant Effects Description
	Significant positive	SA18: The policy sets out the scale of growth across the borough and includes the net increase of employment to be planned for and provided which is 46,000sqm. The policy will contribute to promoting further investment in the borough's town centres and supports the achievement of this objective and addresses key sustainability issues. It is considered to have a significant positive effect.
Policy 3: Location and Management of Growth	Significant positive	SA1: A total of 27, 000 homes will be delivered through the implementation of this local plan policy. These will be located in strategic areas, to ensure housing growth occurs in appropriate locations which are in good proximity to employment. Other policies within the Local Plan address housing types and affordability (such as policies 25 to 26 on affordable housing, housing tenure and housing size and mix). A significant positive effect should therefore result from this policy.
	Significant positive	SA12: Development will be intensified and encouraged on brownfield sites, except those which are valued or safeguarded for specific reasons. This will increase land use efficiency and may help to protect soil quality and geological resources at greenfield sites. Hence a potential significant positive effect has been identified for this SA objective.
	Significant negative	SA13: Designated sites will be protected by the implementation of this policy option. However, those sites which are not designated for protection could be vulnerable to future development, causing irreversible damage or loss of key biodiversity areas. Therefore, a potential significant negative effect has been recorded for this SA objective.
	Uncertain	SA14: The HRA of the Local Plan will determine whether this Local Plan policy will result in an adverse effect on Natura 2000 sites. An uncertain effect has therefore been identified at this time for this SA objective.
	Significant positive	SA17: Existing heritage assets within Waltham Forest will be protected from future development. Investment will also be directed towards the development of assets and the cultural heritage of the Borough. Therefore, a potential significant positive effect has been identified for this SA objective.
	Significant positive	SA20: Future employment numbers are detailed within this policy, which should generate new employment and maintain stable levels of employment within the Borough. For this reason, a potential significant positive effect has been recorded for this SA objective.
Policy 4: Ensuring Good Growth	Significant positive	SA1: The policy promotes growth and lists policy requirements that development proposals will be expected to satisfy. Criteria C relates specifically to housing and the need to 'provide a range of housing choice by size and tenure including affordable housing and cater for people with special needs'. The policy therefore supports the achievement of this objective and key sustainability issues and is considered to have a significant positive effect.
	Significant positive	SA2: Criteria I of the policy relates specifically to creating safe environments which incorporate appropriate design solutions and crime prevention measures that assist in reducing crime, the fear of crime and anti-social behaviour. The policy supports the achievement of this objective and is considered to have potential for an indirect significant positive effect.

Local Plan Policy	Potential Effect	Potential Significant Effects Description
	Significant positive	SA3: Criteria B of the policy requires development proposals to contribute to the improving and enabling healthier lifestyles. When implemented this will help improve the standard of health and wellbeing of those who live and work in the borough. It is therefore considered to have potential for an indirect significant positive effect.
	Significant positive	SA7: Criteria G of the policy requires development proposals to contribute to climate change, through mitigation and adaptation, the use of sustainable building materials and energy efficiency. This will contribute to the reduction of greenhouse gas emissions and promote low carbon growth and is therefore considered to have potential to achieve a direct significant positive effect.
	Significant positive	SA8: Criteria G of the policy requires development proposals to contribute to climate change, through mitigation and adaptation, the use of sustainable building materials and energy efficiency. This will contribute to conserving energy and is therefore considered to have potential to achieve a direct significant positive effect.
	Significant positive	SA12: Criteria A of the policy requires development proposals to make efficient use of land through intensification and mixed-use development which fully supports the achievement of this objective. It is therefore considered to have potential to achieve a significant positive effect.
	Significant positive	SA15: Criteria H of the policy requires development proposals to protect and enhance existing green infrastructure including open space. This will contribute to protecting and enhancing open space areas. It is therefore considered to have potential to achieve a direct significant positive effect.
	Significant positive	SA17: Criteria J of the policy requires development proposals to protect heritage assets including Conservation Areas and Listed Buildings. This will contribute to conserving and enhancing the historic built environment and is therefore considered to have potential to achieve a direct significant positive effect.
	Significant positive	SA20: Criteria D of the policy requires development proposals to provide for a wide range of local employment opportunities that offer a choice of jobs in different sectors of the economy. This will contribute to maintaining stable levels of employment in the Borough and is therefore considered to have potential to achieve a direct significant positive effect.
Policy 5: Encouraging Mixed Use Development and Intensification	Significant positive	SA12: Mixed use developments on individual sites and across an area allows for an efficient use of land. Similarly, intensification involves the development of a property, site or area at a higher density than currently exists through development, redevelopment, infill and expansion or conversion of existing buildings. The policy promotes this kind of development which fully supports the achievement of this objective and is therefore considered to have potential to achieve a significant positive effect.
	Significant positive	SA16: The policy encourages mixed use development that is appropriate to the character of the area and which is appropriate to the function of the particular street/road frontage for example. This will contribute to maintaining local distinctiveness and is therefore considered to have potential for a significant positive effect.

Local Plan Policy	Potential Effect	Potential Significant Effects Description
	Significant positive	SA17: The policy states that development proposals must be informed by an assessment of the site's immediate context and also consider the impact on existing heritage assets. This will contribute to conserving and enhancing the historic environment and is therefore considered to have potential to achieve a significant positive effect.
	Significant positive	SA19: The policy promotes opportunities for mixed development of housing and employment in appropriate locations which will contribute to the achievement of this objective. It is therefore considered to have potential to achieve a significant positive effect.

### 7.3 South Waltham Forest

Table 14: Summary of Potential Significant and Uncertain Effects for South Waltham Forest

Policy 6: South Waltham Forest	Significant positive	SA1: 15,000 new homes will be built within the South of Waltham Forest as a result of this policy. It is assumed that a range of sizes and tenures of homes will be provided in line with Policy 25: Affordable Housing Tenure and Policy 26: Housing Size and Mix, in order to meet the needs of the Borough.
	Significant positive	SA19: This policy focuses employment development in key areas where employment space is required through intensification and co-location of workspaces with other development types. This should support a diverse and robust economy. Therefore, a potential significant positive effect has been identified for this SA objective.
Policy 7: Lea Bridge and Church Road Strategic Location	Significant positive	SA1 This policy will deliver 2,850 new homes to the Lea Bridge and Church Road Strategic Location of the Borough. The policy should therefore contribute to meeting local housing needs and a significant positive effect is identified.
	Significant positive	SA12: None of the potentially available development sites within this strategic location falls within close proximity to a RIG/LIG, and all such sites are upon previously developed land. Development of these sites would therefore be unlikely to result in adverse effects on soil quality and geological resources and is likely to achieve an efficient use of land. A potential significant positive effect is therefore identified.
Policy 8: Low Hall Strategic Location	Significant positive	SA1: 700 new homes will be delivered by this policy within the Low Hall Strategic Location. The policy should therefore contribute to meeting local housing needs and a significant positive effect is identified.
Policy 9: Leyton Strategic Location	Significant positive	SA1: This policy will deliver 6,350 new homes to the Leyton Strategic area of the Borough. The policy should therefore contribute to meeting local housing needs and a significant positive effect is identified.
	Significant positive	SA12: None of the potentially available development sites within this strategic location falls within close proximity to a RIG/LIG, and all such sites are upon previously developed land. Development of these sites would therefore

		be unlikely to result in adverse effects on soil quality and geological resources and is likely to achieve an efficient use of land. A potential significant positive effect is therefore identified.
	Significant positive	SA19: All potentially available development sites in this strategic location are in close proximity to borough employment sites. This policy promotes a range of different employment developments / sectors e.g. visitor economy. Proposed improved train links and redevelopment of Leyton Temple Mills should also help to improve the local economy.
	Significant positive	SA20: All potentially available development sites in this strategic location are in close proximity to borough employment sites and it likely that this policy will support a range of different employment opportunities.
South Leytonstone Strategic Location	Significant positive	SA1: This policy will deliver 500 new homes to the South Leytonstone area of the Borough. The policy should therefore contribute to meeting local housing needs and a significant positive effect is identified.
	Significant positive	SA4: Educational, recreational and religious facilities are accessible from all currently potentially available development sites within this strategic location. Community centres are also relatively accessible. Most available development 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. Future retail, food, cultural and community development is encouraged in appropriate locations by this policy, which may help to expand current services in line with population increase from housing development.
	Significant positive	SA12: None of the potentially available development sites within this strategic location falls within close proximity to a RIG/LIG, and all such sites are previously developed land. Development of these sites would therefore be unlikely to result in adverse effects on soil quality and geological resources and is likely to achieve an efficient use of land. A potential significant positive effect is therefore identified.
	Significant positive	SA19: Most currently potentially available development sites are within 0.4km of a District Centre and are also within close proximity to Borough Employment Areas. This South Leytonstone policy indicates further employment space will be developed through intensification of existing sites, as well as promoting mixed developments with other development types, such as food and drink which should all contribute to a significant positive effect.
	Significant positive	SA20: Most currently potentially available development sites are within 0.4km of a District Centre and are also within close proximity to Borough Employment Areas. This South Leytonstone policy indicates further employment space will be developed through intensification of existing sites, as well as promoting mixed developments with other development types, such as food and drink. This should help to ensure employment levels are maintained and improved within this area of the Borough.
Policy 10: Leytonstone Strategic Location	Significant positive	SA1: 700 new homes will be delivered by this policy within the Leytonstone Strategic Location. The policy should therefore contribute to meeting local housing needs and a significant positive effect is identified.
	Significant positive	SA4: Most currently potentially available development sites within the strategic location are in close proximity to a Town or Local Centre, Primary School, Secondary School, Community Centre, Shopping Frontage, Place of Worship and Recreational facilities. Enhanced access to neighbouring green space may improve community

		cohesion and reduce deprivation. These factors should all contribute to achieving this SA objective and should result in significant positive effects.
	Significant positive	SA12: None of the potentially available development sites within this strategic location falls within close proximity to a RIG/LIG, and all such sites are previously developed land. Development of these sites would therefore be unlikely to result in adverse effects on soil quality and geological resources and is likely to achieve an efficient use of land. Intensification is also encouraged along High Road, which should contribute to efficient use of land. A potential significant positive effect is therefore identified.
	Significant positive	SA18: All potentially available development sites are within close proximity of a District Centre. Strengthening and support of High Road, as included in the policy, would likely result in significant improvements to the centre.
Policy 11: Whipps Cross Strategic Location	Significant positive	SA1: 1,700 new homes will be delivered by this policy within the Whipps Cross Strategic Location. The policy also stipulates that a proportion of these should be affordable for local people, thus local housing needs should be met.
	Significant positive	SA3: The site has good access to recreational facilities such as Hollow Pond, Epping Forest and sports facilities at Leyton Sixth Form College. The strategic location is situated on the Whipps Cross University Hospital site, which is due to be redeveloped to provide high quality healthcare. A local health and well-being centre will also be developed.
	Significant positive	SA12: None of the potentially available development sites within this strategic location falls within close proximity to a RIG/LIG, and all such sites are previously developed land. Development of these sites would therefore be unlikely to result in adverse effects on soil quality and geological resources and is likely to achieve an efficient use of land. A potential significant positive effect is therefore identified.
	Significant negative	SA15: The boundary of this strategic location overlaps with the Metropolitan Green Belt. The Whipps Cross policy aims to explore opportunities to increase access to Epping Forest, which, if uncontrolled, could negatively affect this area of Green Belt Land.
Policy 12: Bakers Arms Strategic Location	Significant positive	SA1: This policy will deliver 850 new homes to the Bakers Arms area of the Borough. The policy should therefore contribute to meeting local housing needs and a significant positive effect is identified.
	Significant positive	SA12: Bakers Arms is located well away from the Borough's LIGS and all potentially available development sites are located on previously developed land. This works towards protection of soil and geological resources and the efficient use of land.
	Significant positive	SA16: This policy requires new developments to consider local setting and character in their design, which may help to indirectly maintain and improve local distinctiveness within Bakers Arms. Bakers Arms Conservation Area is also protected by this policy, with enhancement encouraged.
	Significant positive	SA19: All potentially available development sites are located within walking distance of the Dunton Road employment site. Criteria 3 of this policy also supports the intensification of development for employment space and expansion of such developments to new Borough areas, such as refurbishment of the railway arches.

## 7.4 Central Waltham Forest

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

Local Plan Policy	Potential Effect	Potential Significant Effects Description
Policy: Central Waltham Forest	Significant Positive	SA1: This policy aims to increase the number of homes by 8,000 over the plan period. It is assumed that a range of sizes and tenures of homes will be provided in line with Policy 25: Affordable Housing Tenure and Policy 26: Housing Size and Mix, in order to meet the needs of the Borough.
	Significant positive	SA5: Walthamstow Central will be promoted as a transport link to the area, which may help to reduce all journey lengths, especially those by private car, due to the converging of many transport modes at this location. The policy also seeks to establish improved walking and cycling routes and permeability across the area. The policy also seeks to improve facilities and employment access within the central area. For this reason, a significant positive effect may result from the implementation of this policy.
	Significant negative	SA14: Walthamstow Wetlands and Epping Forest may have increased access from extended cycle networks resulting from the implementation of this policy. This may increase awareness and appreciation of these areas some of which are designated as European sites. However, it is unclear how this new access will be managed. An increase in visitors could lead to trampling, litter and destruction of key habitats. For this reason, a potential significant negative impact has been recorded for this SA objective and this will be investigated as part of the Local Plan HRA.
	Significant positive	SA18: The vitality of the central zone of Waltham Forest should be improved through the implementation of this policy, especially in Walthamstow Town Centre and in the Blackhorse Lane area. Further developments which may contribute to the night time economy will be encouraged by this policy, hence a potential significant positive effect has been identified for this SA objective.
	Significant positive	SA19: The local economy should benefit from an increase in employment space at Waltham Forest Town Hall Campus. Criterion D aims to retain, protect and intensify existing employment land including SIL and BEA, and co-location, where appropriate to support the delivery of a diverse and resilient economy. Hence, a minor positive impact has been recorded for this SA objective.
	Significant positive	SA20: Employment levels could be aided by an increase in employment space at Waltham Forest Town Hall Campus and Blackhorse Lane. As this area is within walking distance of good transport links, it is expected that this could provide employment for those living in and surrounding the central area of Waltham Forest. Jobs may also be created through the development of an evening economy, an aspect this policy encourages. For these reason, as potential significant positive impact has been identified for this SA objective.
	Significant positive	SA1: This policy will lead to the development of 3,150 new homes. The policy should therefore contribute to meeting local housing needs and a significant positive effect is identified.

Policy 13: Walthamstow Town Centre Strategic Location	Significant positive	SA5: The strategic location has good access to sustainable transport links, particularly rail services, as both Walthamstow Central (Victoria and Overground services) and St James Street (Overground services) stations are located within the strategic location. PTAL scores are also high (4-6B).
	Significant positive	SA12: Located well away from the Borough's LIGS and all potentially available development sites are on previously developed land. This works towards protection of soil and geological resources and the efficient use of land.
Policy 14: Forest Road Corridor Strategic Location	Significant positive	SA1: This policy will lead to the development of 1,250 new homes. The policy should therefore contribute to meeting local housing needs and a significant positive effect is identified.
	Significant positive	SA4: All potentially available development sites within the strategic location have good access to a number of community facilities. The policy aims to protect existing important community facilities as well as provide additional social infrastructure. This could help to build community cohesion. The strategic location 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.
	Significant positive	SA12: Located well away from the Borough's LIGS and all potentially available development sites are on previously developed land. This works towards protection of soil and geological resources and the efficient use of land.
	Significant positive	SA16: Policy aims to provide community and social infrastructure as well as the current retail offer. This could help to improve the local distinctiveness of the area. Place making principles, such as the local cultural and heritage setting must also be considered by future developments.
Policy 15: Blackhorse Lane Strategic Location	Significant positive	SA1: This policy will lead to the development of 1,650 new homes. The policy should therefore contribute to meeting local housing needs and a significant positive effect is identified.
	Significant positive	SA12: Located well away from the Borough's LIGS and all potentially available development sites are on previously developed land. This works towards protection of soil and geological resources and the efficient use of land.
	Significant positive	Policy aims to protect and redevelop Uplands Business Park for employment space and encourages opportunities for intensification at the site. This could help to ensure employment development is focused in an appropriate location.
Policy 16: Wood Street Strategic Location	Significant positive	SA1: This policy will deliver 500 new homes to the Wood Street area of the Borough. The policy should therefore contribute to meeting local housing needs and a significant positive effect is identified.
	Significant positive	SA3: Recreational and healthcare facilities are all well located within this strategic location. Public realm and space improvements encouraged by this policy could work towards improving the standards of health and wellbeing of residents within the strategic location.

	Significant positive	SA12: Located well away from the Borough's LIGS and all potentially available development sites are on previously developed land. This works towards protection of soil and geological resources and the efficient use of land.
	Significant positive	SA16: This policy includes public realm improvements which could include features to help to improve the local distinctiveness. Policies also aim to safeguard Wood Street Indoor Market, which is of historic value and unique to the area.

## 7.5 North Waltham Forest

Table 16: Summary of Potential Significant and Uncertain Effects for North Waltham Forest

Local Plan Policy	Potential Effect	Potential Significant Effects Description
Policy 17: North Waltham Forest	Significant positive	SA1: This policy will deliver 3,500 new homes to North Waltham Forest. It is assumed that a range of sizes and tenures of homes will be provided in line with Policy 25: Affordable Housing Tenure and Policy 26: Housing Size and Mix, in order to meet the needs of the Borough.
	Uncertain	SA11: Currently potentially available development sites within the North Circular Corridor strategic location which could be within flood zone 3. FRA will be required to determine suitability for development and development sites would need to pass the sequential test, in accordance with Policy 96: Managing Flood Risk. Policy 96: Managing Flood Risk also encourages developments to be resilient to climate change. An uncertain effect remains as FRA is required to demonstrate that 900 new homes can be delivered within this strategic location without increasing flood risk.
	Significant positive	SA12: It is assumed that development which occurs within this area will focus on currently potentially available development sites which are all previously developed land. A neutral effect is identified, and this is considered in more detail in the strategic location policies for the North Waltham Forest area.
	Significant negative	SA14: HRA screening has identified that all development within the borough could affect nearby European sites. Furthermore, the strategic locations within this part of the borough are within relatively close proximity to Natura 200 sites, including Epping Forest SAC and Lee Valley SPA. Therefore, a significant negative effects is identified.
	Significant positive	SA15: Green Belt and Metropolitan Open Land is directly protected by this policy, and although access is suggested for improvement, it is stipulated that this should only occur where appropriate. For this reason, a potential significant positive impact has been identified.

	Significant positive	SA18: Development is encouraged to occur around three district centres (Highams Park, North Chingford and Chingford Mount) as a result of this policy. The focusing of development to these areas is likely to increase the vitality and viability of these areas. Hence a significant positive effect has been recorded for this SA objective.
	Significant positive	SA19: Employment land will be both retained and intensified through the implementation of this policy. This is likely to improve the local economy and encourage employment developments in appropriate locations, hence a potential significant positive impact has been recorded.
	Significant positive	SA20: Employment within North Waltham Forest and surrounding areas should be increased by the implementation of this policy. Employment space will be intensified and created through this policy, and new job creation is a key focus of criterion B of this policy. Therefore, a potential significant positive effect has been identified for this SA objective.
Policy 18: North Chingford Strategic Location	Significant positive	SA1: 300 new homes will be delivered by this policy within the North Chingford Strategic Location. The policy should therefore contribute to meeting local housing needs and a significant positive effect is identified.
	Significant positive	SA5: The strategic location has good transport links, with Chingford railway station within walking distance of all currently potentially available development sites. The currently potentially available development sites are located within Chingford District centre. This policy states the intended use of underutilised backland areas and car parks is for housing development.
	Significant positive	SA12: North Chingford is located well away from the Borough's LIGS and all potential development sites are located on previously developed land. This works towards protection of soil and geological resources and efficient use of land.
	Significant negative	SA20: The North Chingford is located away from the Borough's Employment Areas (BEAs). No provision for expanding employment space or intensification of current BEAs in line with future population increase is covered within the policy. This could lead to a shortage of jobs within North Chingford, meaning residents must seek employment elsewhere.
Policy 19: South Chingford/ Chingford Mount Strategic Location	Significant positive	SA1: This policy will deliver 200 new homes to the strategic location. The policy should therefore contribute to meeting local housing needs and a significant positive effect is identified.
	Significant positive	SA12: Located well away from the Borough's RIGS/LIGS and all potentially available development sites are on previously developed land. This works towards protection of soil and geological resources and the efficient use of land.
Policy 20: Highams Park Strategic Location	Significant positive	SA1: 450 new homes will be delivered by this policy within the Highams Park Strategic Location. The policy should therefore contribute to meeting local housing needs and a significant positive effect is identified.
	Significant positive	SA3: All currently potentially available development sites within the strategic location have healthcare facilities within walking distance (<600m). The strategic location has good access to recreational facilities at Higham Park School and Rolls Sports Ground. The policy also requires future facilities such as schools and healthcare to be increased in line with population increase.

	Significant positive	SA4: All currently potentially available development sites within this strategic location benefit from good access to a number of community facilities. The strategic location is considered to be deprived with regards to barriers to housing. The addition of more homes may help the barriers to existing housing and the policy should ensure facilities such as schools and healthcare are increased in line with the population increase.
	Significant positive	SA12: Highams Park is well away from the Borough's LIGS and all potential development sites are located on previously developed land. This works towards protection of soil and geological resources and efficient use of land.
	Significant positive	SA18: The strategic location is located within Highams Park District Centre, and all sites are within walking distance of the centre's facilities. All currently potentially available development sites will support the district centre. Criteria 5 and 6 aim to encourage a mix of activity to improve the vitality and viability of the District Centre.
	Significant positive	SA20: One currently potentially available development is located within a key Borough employment area. Development of further employment space at Hickman Avenue is encouraged by this policy, which should help to maintain employment within the Borough.
Policy 21: Sewardstone Road Strategic Location	Significant positive	SA1: 450 new homes will be delivered by this policy within the Sewardstone Road Strategic Location. The policy should therefore contribute to meeting local housing needs and a significant positive effect is identified.
	Significant positive	SA12: This strategic location is located 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 efficient use of land.
	Significant negative	SA19: Sewardstone Road strategic location is located outside of a town/district centre and the Borough's main employment areas and no provision for future employment provision is specified within the policy. It is not located in an appropriate location in the Borough's main employment area as it is located on the boundary of the Borough, which could mean that residents may seek employment opportunities in neighbouring Enfield.
	Significant negative	SA20: The strategic location is located outside of a town/district centre and the Borough's main employment areas which will not contribute to maintaining stable levels of employment in the borough.
Policy 22: North Circular Corridor Strategic Location	Significant positive	SA1: This policy will deliver 900 new homes to the North Circular area of the Borough. The policy should therefore contribute to meeting local housing needs and a significant positive effect is identified.
	Uncertain	SA11: Currently potentially available development sites within this strategic location could be within flood zone 3. FRA will be required to determine suitability for development and development sites would need to pass the sequential test, in accordance with Policy 96: Managing Flood Risk. Policy 96: Managing Flood Risk also encourages developments to be resilient to climate change. An uncertain effect remains as FRA is required to demonstrate that 900 new homes can be delivered within this strategic location without increasing flood risk.
	Significant positive	SA12: Located well away from the Borough's LIGS and all sites are located on previously developed land. The strategic location policy also details the need for intensification of development and the use of taller buildings to achieve higher density development. This works towards the protection of soil and geological resources, as well as increasing land efficiency.

## SA Findings for Thematic Policies

### 7.6 Decent Homes for Everyone

Table 17: Summary of the potential significant and uncertain effects of the Decent Homes for Everyone Theme

Local Plan Policy	Potential Effect	Potential Significant Effects Description
Policy 23: Increasing Housing Supply	Significant positive	SA1: The policy relates specifically to increasing housing supply by delivering a minimum of 18,000 homes by 2030 and 27,000 by 2035 and sets out criteria of how new homes will be delivered. It makes clear how new homes should not only be good quality but should be genuinely affordable and meet the needs of Waltham Forest's existing and future population. It therefore fully supports the achievement of this objective and addresses key sustainability issues and will result in a significant positive effect.
	Uncertain	SA11: The policy seeks to increase housing delivery in the borough to a minimum of 18,000 homes by 2030 and 27,000 homes by 2035. This high number of homes may increase flood risk depending on where development is located which is not specified within this policy. For this reason, an uncertain effect has been identified.
	Significant positive	SA12: The policy fully supports the achievement of this objective and key sustainability issues which can be seen clearly in Criteria D of the policy which states that new homes will be delivered by maximizing opportunities to increase the supply of additional homes on all suitable, appropriate and available sites including brownfield land, surplus public sector land and encouraging residential intensification. Criteria H of the policy also supports the development of small sites for new homes. It is therefore considered that the policy has a significant positive effect on this SA objective.
	Uncertain	SA14: The HRA of the Local Plan will determine whether this Local Plan policy will result in an adverse effect on Natura 2000 sites. An uncertain effect has therefore been identified at this time for this SA objective.
	Significant positive	SA18: The policy relates specifically to increasing housing supply and promotes the delivery of new homes next to transport hubs and on all suitable, appropriate and available sites including small sites, developing brownfield land and surplus public sector land. This contributes to maintaining and enhancing the vitality and viability of the Borough's town centres and promoting residential investment in town centres. It is therefore considered that the policy will have a significant positive effect.
Policy 24: Delivering Genuinely Affordable Housing	Significant positive	SA1: The policy promotes the delivery of affordable housing across the borough and sets out a number of criteria of how this will be achieved. It therefore fully supports the achievement of this objective and will help address the shortfall in the provision of affordable housing that are mixed and well-balanced in terms of tenure and income.
	Significant positive	SA18: The policy relates specifically to the delivery of genuinely affordable housing across the Borough and therefore promotes residential investment. This will contribute to maintaining and enhancing the vitality and viability of the

		Borough's town centres and support the achievement of this objective. It is therefore considered to have a significant positive effect.
Policy 25: Affordable Housing	Significant positive	SA1: Delivery of low-cost housing is a priority across the borough. To support this the policy requires housing schemes over 10 units to provide the following affordable housing tenure split: - low cost affordable rent: 70%; - intermediate housing products: 30%. It therefore fully supports the achievement of this objective and will help address the shortfall in the provision of affordable housing that are mixed and well-balanced in terms of tenure and income.
	Significant positive	SA18: The policy relates specifically to the delivery of affordable housing tenure on schemes over 10 units across the Borough and therefore promotes residential investment. This will contribute to maintaining and enhancing the vitality and viability of the Borough's town centres and support the achievement of this objective. It is therefore considered to have a significant positive effect.
Policy 26: Housing Size and Mix	No potential	significant or uncertain effects have been predicted for this policy.
Policy 27: Housing Design	Significant positive	SA3: The provision of amenity space has a significant impact on people's physical and mental health. This policy promotes the provision of a variety of amenity space depending on the size and type of new housing and requires all new housing to meet the minimum national standards for amenity space. It is therefore considered to have a positive significant effect.
	Significant positive	SA16: The policy requires new housing to provide well designed amenity space. The provision of amenity space offers a high-quality living environment which will contribute to maintaining and improving local distinctiveness. It is therefore considered to have a significant positive effect.
Policy 28: Access and Adaptable Housing	No potential	significant or uncertain effects have been predicted for this policy.
Policy 29: Redevelopment of existing housing and estate regeneration	Significant positive	SA1: The policy supports the achievement of this objective as it promotes the delivery of housing through the efficient use of existing land. It recognises how important the redevelopment of existing housing end estate regeneration can provide a range of tenures and genuinely affordable homes which is one of the key sustainability issues for this objective. It is therefore predicted to have a significant positive effect.
	Significant positive	SA12: The policy supports the achievement of this objective as it promotes the delivery of housing through the redevelopment of existing housing and estate regeneration using existing land and buildings. For example, Criteria A of the policy encourages the efficient use of underutilised housing estates with infill and Criteria C requires the loss of any existing housing to lead to a net increase in new homes. It is therefore considered to have a significant positive effect.
Policy 30: Other forms of Housing	Significant positive	SA1: The policy supports development schemes for alternative models of housing such as Built to Rent, Purpose Built Student Housing and Purpose-Built Shared Living Housing which will contribute to the achievement of this objective and key sustainability issues. It reinforces how different types of housing play an important role in the Borough. For

		example, Built to Rent can be delivered faster as it has a different economic model than build for sale homes. The policy is therefore considered to have a significant positive effect.
	Uncertain	SA12: An uncertain effect is predicted as this could result in greenfield land being developed if there is any available in the borough such as parks or amenity space which is not protected from development.
Policy 31: Small Sites	Significant positive	SA1: The policy promotes new housing development of small sites (defined as below 0.25ha) and encourages innovative approaches to housing delivery. This can be achieved through incremental intensification of existing residential areas and town centres where appropriate. It therefore fully supports the achievement of this objective and addresses key sustainability issues and will result in a significant positive effect.
	Uncertain	SA12: An uncertain effect is predicted as the policy does not specify that infill development should be on brownfield sites rather than small greenfield sites. This could lead to the irreversible development of some smaller greenfield sites. Mitigation is suggested below to help enhance this policy.
	Uncertain	SA14: The HRA of the Local Plan will determine whether this Local Plan policy will result in an adverse effect on Natura 2000 sites. An uncertain effect has therefore been identified at this time for this SA objective.
	Uncertain	SA15: An uncertain effect is predicted as the policy does not specifically mention if greenbelt and open space areas could be developed as a result of the implementation of this policy. Mitigation is suggested below to help enhance this policy.
	Significant positive	SA18: The policy relates specifically to promoting residential investment on small sites in existing residential areas and town centres. This will contribute to maintaining and enhancing the vitality and viability of the Borough's town centres and support the achievement of this objective. It is therefore considered to have a significant positive effect.
Policy 32: Housing in Multiple Occupation (HMOs) and Conversions	No potential	significant or uncertain effects have been predicted for this policy.
Policy 33: Downsizing	Significant positive	SA1: The policy supports the achievement of this objective and some key sustainability issues in that it promotes and encourages development proposals for self-contained older persons accommodation which also helps release existing family houses back onto the market. The policy encourages self-contained older persons accommodation on all developments of 150 dwellings or more in suitable locations. It is therefore considered to have a significant positive effect.
Policy 34: Supported and Specialist Accommodation	Significant positive	SA1: The policy supports the achievement of this objective and key sustainability issues in that it promotes and encourages housing schemes for supported and specialist accommodation which includes specialist older people's housing. In addition, Criteria B of the policy also supports these schemes if they meet the local and strategic housing needs. It is therefore considered to have a significant positive effect.
Policy 35: Gypsies and Travellers	No potential	significant or uncertain effects have been predicted for this policy.

Policy 36: Community-Led, Self-Build and Custom Build Housing	Significant positive	SA1: The policy supports the achievement of this objective as it promotes schemes for community led housing, self-build and custom build housing projects. These can all play an important role in providing new homes for residents as well as supporting more flexible approaches to the provision of housing. It is therefore considered to have a significant positive effect.
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## 7.7 Building a Resilient and Creative Economy

Table 18: Summary of Potential Significant and Uncertain Effects for Building a Resilient and Creative Economy

Local Plan Policy	Potential Effect	Potential Significant Effects Description
Policy 37: Supporting Economic Growth and Jobs	Significant positive	SA18: The policy supports and promotes employment growth and Criteria A of the policy sets out the provision of a range of employment floorspace typologies to broaden the economic base and maximise additional employment floorspace. This will contribute to maintaining the enhancing the vitality and viability of the borough's town centres and is therefore considered to have a significant positive effect.
	Significant positive	SA19: The policy encourages the provision of a range of employment floorspace typologies including distribution uses, industrious space and new London mix. These typologies have been identified from the Waltham Forest Employment Land Review as being appropriate to meet the borough's projected needs in terms of employment floorspace. The policy therefore fully supports the achievement of the objective and will contribute positively to key sustainability issues. It is therefore considered to have a significant positive effect.
	Significant positive	SA20: The policy supports and promotes the provision of a minimum of 46,000 sqm of additional employment floorspace to help provide opportunities for employment growth in the borough. It is therefore predicted to fully support the achievement of this objective and to address key sustainability issues relating to employment.
Policy 38: Safeguarding Employment Land	Significant positive	SA18: The policy safeguards employment land to accommodate potential job growth which will contribute to maintaining and enhancing the vitality and viability of the borough's town centres. It will support and promote Strategic Industrial Locations and Borough Employment Areas and is predicted to have a significant positive effect.
	Significant positive	SA19: The policy safeguards employment land and promotes development on designated employment areas including Strategic Industrial Locations and Borough Employment Areas. This will help unlock opportunities to deliver additional floorspace capacity which will contribute towards the achievement of this objective. It is therefore predicted to have a significant positive effect.
	Significant positive	SA20: The policy protects and safeguards employment land and encourages the delivery of extra additional employment floorspace which will provide local employment opportunities. It is therefore considered to have a significant positive effect.

Policy 39: Managing Change in Designated Employment Areas	Significant positive	SA4: The policy promotes the co-location of employment with other uses that includes community/social infrastructure (Class D1 and D2) and Food and Beverages (Class A3). This co-location of uses will improve community cohesion and provide opportunities for place-making. It is therefore predicted to have a significant positive effect.
	Significant positive	SA18: The policy supports proposals for the regeneration of parts or whole areas of designated employment areas, and this can include co-location of employment with other appropriate uses. This will contribute to maintaining and enhancing the vitality and viability of the borough's town centres and is considered to have a significant positive effect.
	Significant positive	SA19: The proposals support the regeneration of designated employment sites and the co-location of employment with other appropriate uses. This could include co-locating employment sites with industrial sites and mixing industrial with appropriate non-industrial uses. It therefore fully supports the achievement of this objective and key sustainability issues and is predicted to have a significant positive effect.
	Significant positive	SA20: The policy promotes co-location of sites delivering employment use and non-employment uses and ultimately seeks to manage change in the regeneration of designated employment areas. It therefore fully supports the achievement of this objective and addresses key sustainability issues and is predicted to have a significant positive effect.
Policy 40: Approach to Non-Designated Employment Land	Significant positive	SA18: Non-designated employment sites provide suitable location for lighter, manufacturing and production uses for example. This will help meet the borough's demand for employment space and help maintain and enhance the vitality and viability of the Borough's town centres. It is therefore considered to have a significant positive effect.
	Significant positive	SA19: The policy protects non-designated employment land as locations for employment by supporting new development that is designed for employment use and to accommodate a range of appropriate identified future employment growth sectors. This includes employment sites for lighter industrial, manufacturing and production uses. It is therefore predicted to have a significant positive effect and address key sustainability issues.
	Significant positive	SA20: The policy protects non-designated employment land as locations for employment by supporting new development that is designed for employment use and to accommodate a range of appropriate identified future employment growth sectors. This will contribute to maintaining stable levels of employment in the Borough and is therefore considered to have a significant positive effect.
Policy 41: Offices and Workspaces	Significant positive	SA18: The policy promotes the provision of offices and flexible workspaces for small and medium sized enterprises in sustainable locations. New office development will contribute to the vitality, viability and vibrancy of the borough's town centres by creating footfall and daytime activity. It is therefore predicted to have a significant positive effect.
	Significant positive	SA19: Specific investment directed through the provision of new office space and workspaces into existing local areas including the Blackhorse Lane Creative Enterprise Zone will help improve the local economy by enabling employment development. It is therefore predicted to have a significant positive effect.
	Significant positive	SA20: The policy promotes the provision of offices and workspaces of varying sizes and it promotes low cost affordable spaces as part of mixed-use development. This will contribute to the growth of start-ups, SME's, creative and digital

		industries which will create new employment opportunities and help to maintain levels of employment in the borough. It is therefore predicted to have a significant positive effect.
Policy 42: Creative Enterprise Zone	Significant positive	SA16: The strengthening of the Creative Enterprise Zone throughout the Borough may help to increase local distinctiveness. Pockets of creative enterprises could be developed, as the clustering of 'creative, digital and cultural industries' will be encouraged/increased.
	Uncertain	SA18: The creation of Creative Enterprise Zones (CEZ) may help to draw people to the town centres if the CEZs are located here. However, it is unclear from this policy if these CEZ developments will be in town centres or further out in more isolated patches. Therefore, an uncertain effect has been recorded.
	Significant positive	SA19: Creative developments will be concentrated in already established areas of creative industry and retail, which have good links to public transport. This should ensure that employment resulting from these developments is in accessible and appropriate locations.
Policy 43: Local Jobs, Skills and Training	Significant positive	SA4: The policy fully supports the achievement of the objective and addresses key sustainability issues. Its primary purpose is to promote access to Waltham Forest residents to a broad range of local jobs, skills and training which has direct links to improving community cohesion and reducing inequalities. It is therefore considered to have a significant positive effect.
	Significant positive	SA18: The policy supports economic growth and employment opportunities through the creation and promotion of local jobs, skills and training. These all contribute to the achievement of this objective and the relevant key sustainability issues. For example, Criteria B of the policy supports the growth of existing and future start-ups, SME's and businesses. Furthermore, more businesses and employment in the area should increase spending in town centres. It is therefore considered to have a significant positive effect.
	Significant positive	SA19: The policy supports economic growth and employment opportunities through the creation and promotion of local jobs, skills and training. These all contribute to the achievement of this objective and the relevant key sustainability issues. For example, Criteria C of the policy supports the growth of existing and future business start-ups. It is therefore considered to have a significant positive effect.
	Significant positive	SA20: The policy fully supports the achievement of the objective and addresses key sustainability issues. Its primary purpose is to promote and support a broad range of employment and training opportunities and to ensure that all new major development offers employment opportunities to local residents. It is therefore considered to have a significant positive effect.
Policy 44: Railway Arches	Significant positive	SA12: The policy supports the achievement of this objective and addresses some relevant key sustainability issues as it promotes development at railway arches that can provide suitable and affordable locations for a range of uses e.g. general industrial use, commercial and retail use. It is therefore considered to have a significant positive effect.
	Significant positive	SA16: The policy fully supports the achievement of this objective and addresses all relevant key sustainability issues as it promotes development of railway arches to create attractive places to work and visit. It is therefore considered to have a significant positive effect.

	Significant positive	SA19: The policy supports the development of railway arches in the borough that can provide suitable and affordable locations for a range of employment development. It is therefore considered to have a significant positive effect.
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## 7.8 Promoting Culture and Creativity

Table 19: Summary of Potential Significant and Uncertain Effects for Promoting Culture and Creativity

Local Plan Policy	Potential Effect	Potential Significant Effects Description
Policy 45: Promoting Culture and Creativity	Significant positive	SA4: The implementation of this policy has the potential for a minor positive impact on this SA objective. The locating “of arts, culture, entertainment and visitor facilities” within central areas of the borough could help to ensure that all are able to access and use these facilities. Current cultural facilities will be maintained, and new developments of this type will also be encouraged. In addition, areas of outside space will be promoted for the use of cultural, recreational and sporting activities. Therefore, a potential significant positive impact has been recorded for this SA objective.
	Significant positive	SA18: The implementation of this policy has the potential for a significant positive effect on this SA objective. Development proposals concerning “arts, culture, entertainment and visitor facilities” will be focused within district centres. Funding may also be gained to further enhance these facilities. This should promote the town centres and help to make them vibrant places to visit.

## 7.9 Distinctive Town Centres and High Streets

Table 20: Summary of Potential Significant and Uncertain Effects for Distinctive Town Centres and High Streets

Local Plan Policy	Potential Effect	Potential Significant Effects Description
Policy 46: Protecting Pubs	No potential	significant or uncertain effects have been predicted for this policy.
Policy 47: Hierarchy of Centres	Significant positive	SA18: The policy supports the achievement of this objective as it protects and enhances the Borough's network of centres to provide a sustainable distribution of town centre facilities and services which contributes to the promotion of retail investment in town centres. It is therefore considered to have a significant positive effect.
	Significant positive	SA20: The policy supports the achievement of the objective as its primary purpose is to provide a sustainable distribution of town centre facilities and services to support local communities and also to protect and enhance existing

		centres. It is therefore considered to have a significant positive effect on helping to maintain stable levels of employment in the Borough.
Policy 48: New Retail, Office and Leisure Developments	Significant positive	SA4: The policy supports the delivery of new developments which includes leisure and cultural/tourism, entertainment, hotel, community and other service uses that is appropriate to the role and function of the particular centre or parade and its catchment. This also supports some key sustainability objectives such as the need to build on the borough's arts, culture and sport strengths and to deliver new facilities across the borough. It is therefore considered to have a significant positive effect.
	Significant positive	SA18: The policy promotes and supports a mix of retail, leisure and office development which will help retain and develop the Borough's town centres' vibrancy and vitality. It will therefore fully support the achievement of this objective and address key sustainability issues as it seeks to direct new investment into town centres. Consequently, it is predicted to have a significant positive effect.
Policy 49: Revitalisation, Adaptation and Regeneration in Designated Centres and Parades	Significant positive	SA12: The policy supports development proposals that involve the revitalisation, adaption and regeneration of the borough's designated centres/retail parades and other non-designated areas. It promotes the conversion and adaption of existing buildings to appropriate alternative uses and this includes vacant units. This exemplifies how the policy supports the achievement of this objective and is therefore considered to have a significant positive effect.
	Significant positive	SA18: This policy fully supports the achievement of this objective. For example, it seeks to encourage the development of flexible and adaptable units and establish Business Improvement Districts to create an improved environment for business and secure improvements in town centre performance. A mix of uses on individual sites and across an area will support vitality and viability. It is therefore considered to have a significant positive effect.

## 7.10 Social and Community Infrastructure

Table 21: Summary of Potential Significant and Uncertain Effects for Social and Community Infrastructure

Local Plan Policy	Potential Effect	Potential Significant Effects Description
Policy 50: Managing Changes of Use in Primary Shopping Areas		No potential significant or uncertain effects have been predicted for this policy.
Policy 51: Managing Changes of Use outside Primary Shopping Areas of Walthamstow Town Centre and the District Centres		No potential significant or uncertain effects have been predicted for this policy.
Policy 52: Managing Changes of Use in Neighbourhood Centres and Local Retail Parades		No potential significant or uncertain effects have been predicted for this policy.
Policy 53: Evening and Night-time Economy Uses		No potential significant or uncertain effects have been predicted for this policy.
Policy 54: Shopfronts and Signage		No potential significant or uncertain effects have been predicted for this policy.
Policy 55: Social and Community Infrastructure	Significant positive	SA3: New developments will have to contribute to new facilities to ensure the social and community infrastructure within the borough is adequate. This in turn may aid in increasing wellbeing of those living within Waltham Forest. For this reason, a significant positive impact has been identified for this SA objective.
	Significant positive	SA4: The implementation of this policy may aid in meeting the social and community facility needs of the Borough. New developments will have to contribute to new facilities to ensure the social and community infrastructure within Waltham Forest is adequate. For this reason, a minor positive impact has been identified for this SA objective.
	Significant positive	SA5: The implementation of this policy may aid in meeting the social and community facility needs of the Borough. New housing developments will have to contribute to new facilities to ensure the social and community infrastructure within the borough is adequate. Moreover, access to these facilities is encouraged to be through sustainable methods, such as walking, cycling and bus use. Therefore, a significant positive impact has been identified for this SA objective.

Policy 56: Loss of Existing Social or Community Infrastructure	No potential significant or uncertain effects have been predicted for this policy.
Policy 57: Education and Childcare Facilities	No potential significant or uncertain effects have been predicted for this policy.

## 7.11 Promoting Health and Well-being

Table 22: Summary of Potential Significant and Uncertain Effects for Promoting Health and Well-Being

Local Plan Policy	Potential Effect	Potential Significant Effects Description
Policy 58: Promoting Healthy Communities	Significant positive	SA3: There is potential for a significant positive impact on this SA objective through the implementation of this policy. This policy could help to increase health and wellbeing within the Borough as it looks at reducing “indoor and outdoor pollutants and other environmental impacts on health and wellbeing”. Developments of 100 homes or more and other non-residential development types will also have to submit a Health Impact Assessment (HIA) in order to demonstrate the effects development may have on local communities. Open space access and provision are also addressed within this policy, which could support the enhancement of wellbeing. Healthcare facilities are also aimed to be improved throughout the Borough. Therefore, a significant positive effect has been recorded for this SA objective.
Policy 59: High Quality Environment	Significant positive	SA1: This policy will help to ensure that any new housing is built to the highest building and environmental standards, whilst also considering the lifestyle of future residents. This will help to meet the housing needs with the highest quality development. For this reason, a significant positive impact for has been recorded for this SA objective.
	Significant positive	SA2: This policy encourages “safe and accessible spaces for social interaction and community engagement”. The creation of a safe and communal environment is likely to aid in decreasing the risk and fear of crime within the Borough. However, this policy only applies to new developments. For this reason, a potential significant positive impact has been recorded, but of low magnitude for this SA objective.
	Significant positive	SA3: The implementation of this policy may aid in increasing the health and wellbeing of those living and working within the Borough, as all new development must be built to “contribute to a high-quality environment that enables healthier and active lifestyles and reduce health inequalities”. Hence a significant potential positive impact has been recorded for this SA objective. It is, however, worth noting that the magnitude of this impact may be limited, as only new developments will consider this policy.

Policy 60: Hot Food Takeaways	Significant positive	SA2: The implementation of this policy may help to ensure anti-social behaviour which may result from the clustering of hot food takeaways is reduced. Litter and noise associated with these types of developments may also be reduced. Therefore, a potential significant positive impact has been recorded for this SA objective.
	Significant positive	SA3: This policy may help to increase standard of health within the Borough, by preventing the clustering of hot food takeaway developments. In particular, development around “a primary school, a secondary school, a community college and youth facilities” is restricted, which may aid in preventing young people from using these shops to obtain fast, unhealthy foods in their daily routine. New takeaway businesses will also have to comply with the Waltham Forest Healthier Catering Commitment within 6 months of opening. Hence, a potential significant positive impact has been recorded for this SA objective.
Policy 61: Betting Shops and Payday Loan Shops	No potential significant or uncertain effects have been predicted for this policy.	

## 7.12 Creating High Quality Places

Table 23: Summary of Potential Significant and Uncertain Effects for Creating High Quality Places

Local Plan Policy	Potential Effect	Potential Significant Effects Description
Policy 62: Delivering High Quality Design	Significant positive	SA2: The policy fully supports development proposals which deliver high quality 'safe' design. For example: <ul style="list-style-type: none"> <li>- Part C of the policy criteria states that development proposals should provide appropriate safe connections with surrounding streets, paths and neighbouring development.</li> <li>- Part P of the policy criteria states that development proposals should 'facilitate inclusive, safe and accessible environments for all'.</li> <li>- Part Q of the policy criteria specifically makes reference of the requirement to incorporate measures to 'design out crime' into development proposals following guidance from the 'Secured by Design' Scheme.</li> </ul> These exemplify how the policy supports the achievement of this SA objective (SA2) and all relevant key sustainability issues and is therefore considered to have a significant positive effect.
	Significant positive	SA13: The policy supports the achievement of this objective (SA13) and key sustainability issues. It requires development proposals to 'incorporate high quality landscaping, tree planting and urban greening measures to maximise biodiversity and ecological interest' (criteria K of the policy). Criteria M of the policy specifically relates to implementing design measures that increase climate change resiliency. It is therefore predicted to have a significant positive effect.

	Significant positive	SA16: The policy fully supports the achievement of this objective (SA16) and key sustainability issues. In criteria A of the policy it states that 'development proposals should be supported by a clear and robust design rationale based on a sound understanding and analysis of local context and character'. Similarly, criteria B requires that development proposals to reinforce and/or enhance local character and distinctiveness. It is therefore considered to have a potentially significant positive effect.
Policy 63: Tall Buildings	Significant positive	SA1: The policy supports new development in principle and the achievement of this SA objective (SA1) as tall buildings can help optimise the use of land and assist in accommodating the borough's growth and these are likely to include housing provision and new dwellings. The policy is therefore considered to have a potentially significant positive effect.
	Significant positive	SA4: This policy supports the achievement of this objective (SA4) and key sustainability issues. For example, criteria A of the policy states that tall building development proposals will be assessed on their location in terms of accessibility to transport interchanges and nearby facilities such as shops, community facilities and other services. This will contribute to achieving key sustainability issues such as 'help to support development of successful neighbourhoods' as well as supporting the achievement of this objective overall. It is therefore considered to have a significant positive effect.
	Significant positive	SA5: This policy supports the achievement of this objective (SA5) and key sustainability issues. For example, criteria A of the policy states that tall building development proposals will be assessed on their location in terms of accessibility to transport interchanges and nearby facilities such as shops, community facilities and other services. This will contribute to achieving key sustainability issues such as 'help to support development of successful neighbourhoods' as well as supporting the achievement of this objective overall. It is therefore considered to have a significant positive effect.
	Significant positive	SA12: Supporting text to the policy states how tall buildings can help optimise the use of land in accommodating the borough's anticipated growth over the coming years. The policy requires development proposals for tall buildings to enhance the existing streetscape and to ensure its location is accessible to transport interchanges and nearby facilities and services. This promotes the efficient use of land and buildings and hence the policy is considered to support this objective rather than key sustainability issues. It is therefore predicted to have a significant positive effect.
	Significant positive	SA16: The policy fully supports the achievement of this objective (SA16) and addresses key sustainability issues. Criteria E and G of the policy require tall building proposals to demonstrate how they enhance the existing streetscape, townscape, landscapes, heritage and historic assets and their skylines, and to preserve landmarks and views identified in the Urban Design SPD. This can be particularly challenging in a predominantly low-rise borough like Waltham Forest. It is therefore considered to have a significant positive effect.
	Significant positive	SA18: The policy promotes tall building proposals if they meet the specific policy criteria. If this is achieved then tall buildings can help maintain and enhance the vitality and viability of the Borough's town centres. As stated in the

		supporting text to the policy, they can also support legibility at key destinations and become beacons for regeneration to stimulate further investment. It is therefore considered that the policy supports the achievement of this objective and addresses key sustainability issues and may result in a significant positive effect.
	Significant positive	SA19: The policy fully supports the achievement of this objective. For example, criteria D requires tall building proposals to demonstrate how they support legibility and high quality placemaking in the local area. tall buildings could address several of the key sustainability issues. Overall, it could potentially result in a significant positive effect on this SA objective.
Policy 64: Amenity	No potential	significant or uncertain effects have been predicted for this policy.
Policy 65: Designing Out Crime	Significant positive	SA2: The policy aims to improve community safety and cohesion by designing out crime. It promotes the design of new development to create safe environments and reduce crime and disorder. For example, Criteria A of the policy requires all new development to incorporate principles and practises of 'Designing out Crime' and 'Secured by Design'. Criteria C of the policy promotes safer streets and public realm improvements throughout the Borough. This fully supports the achievement of this objective and is therefore considered to have a significant positive effect.
	Significant positive	SA4: The policy aims to improve community safety and cohesion by designing out crime by working with partners to achieve this and by requiring all new development to incorporate principles and practices which design out crime. This will improve community cohesion and is therefore considered to have a significant positive effect
Policy 66: Advertisements	No potential	significant or uncertain effects have been predicted for this policy.

## 7.13 Sustainable Transport and Infrastructure

Table 24: Summary of Potential Significant and Uncertain Effects for Sustainable Transport and Infrastructure

Local Plan Policy	Potential Effect	Potential Significant Effects Description
Policy 67: Liveable Neighbour	Significant positive	SA3: The policy aims to create liveable neighbourhoods for everyone which provide access to clean air, eliminate road danger and to increase the number of trips made by walking, cycling and public transport. It therefore fully supports the achievement of this objective and addresses all relevant key sustainability issues as it supports development which improves the standard of health and wellbeing of those who live and work in the Borough. A significant positive effect is therefore predicted.
	Significant positive	SA5: One of the key sustainability issues for this objective is to promote walking and cycling for local journeys in place of travel by private car. This exemplifies how this policy fully supports the achievement of this objective and is considered to have a significant positive effect.

	Significant positive	SA9: The policy fully supports the achievement of this objective and addresses the relevant key sustainability issues as it supports development which improves air quality to create more attractive neighbourhoods for residents and visitors. It is therefore considered to have a significant positive effect.
	Significant positive	SA16: The policy aims to create liveable neighbourhoods for everyone which contribute towards enhancing streets to meet Healthy Streets across the public realm in the borough. It therefore fully supports the achievement of this objective and addresses all relevant key sustainability issues and is considered to have a significant positive effect.
Policy 68: Walking and Cycling	Significant positive	SA3: The policy promotes walking and cycling and therefore fully supports the achievement of this objective and key sustainability issues and is considered to have a significant positive effect.
	Significant positive	SA4: One of the key sustainability issues for this objective is to help support development of successful neighbourhoods. This exemplifies how this policy fully supports the achievement of this objective and is considered to have a significant positive effect.
	Significant positive	SA5: The policy promotes walking and cycling and improved accessibility by foot and cycle within neighbourhoods. It therefore fully supports the achievement of this objective and key sustainability issues and is considered to have a significant positive effect.
Policy 69: Public Transport	Significant positive	SA5: The policy promotes public transport and therefore fully supports the achievement of this objective and key sustainability issues and is considered to have a significant positive effect.
	Significant positive	SA18: A significant positive effect is likely in relation to this objective as the policy states that development should support and enhance public transport connectivity across the borough which will contribute to maintaining and enhancing the vitality and viability of the Borough's town centre. For example, the policy requires major development to contribute to the delivery of new rail, underground or overground infrastructure and improve local bus networks.
	Significant positive	SA20: The policy is likely to contribute to the achievement of this objective as public transport and enhanced public transport will help create new employment opportunities which is likely to encourage economic growth as well as maintaining stable levels of employment in the Borough. It is therefore considered to contribute a significant positive effect to helping maintain stable levels of employment.
Policy 70: Deliveries Freight and Servicing	Significant positive	SA9: The policy supports the achievement of this objective and addresses some key sustainability issues as it aims to minimise the adverse impacts of freight and servicing and minimise impacts on local transport networks. In Criteria D for residential and commercial development it promotes the use of zero emission vehicles such as cargo bikes and electric vehicles for servicing and deliveries. The policy also requires all development proposals to submit a Construction Logistics Plan. It is therefore considered to have a significant positive effect.
	Uncertain	SA14: There is insufficient information on which to determine the effect of the policy on the SA objective at this stage. For example, the effect would depend on the routing of freight vehicles and their proximity to SSSIs and European sites in the borough. Therefore, an uncertain effect is predicted and a mitigation measure is provided below.

Policy 71: Construction Logistics Plan	No potential significant or uncertain effects have been predicted for this policy.	
Policy 72: Managing Vehicle Traffic	Significant positive	SA3: The policy promotes car-free lifestyles and the benefits from reducing the need to travel by private car can have on the health and wellbeing of those who live in the borough. It can also increase physical activity. The policy also promotes car clubs in new development which encourages residents to walk, cycle or take public transport. It is therefore considered to fully support the achievement of this objective and key sustainability issues and to have a significant positive effect.
	Significant positive	SA7: The policy promotes car free development, the provision of electric charge points where parking is proposed and requires all operational vehicles to be electric vehicles. These provide some examples of how the policy fully supports the achievement of this objective and key sustainability issues.
	Significant positive	SA9: The policy sets out criteria for effectively managing car use and private car travel which will bring improved air quality and decreased local congestion. It is therefore predicted to have a significant positive effect.
Policy 73: Electric Vehicles	Significant positive	SA7: The policy promotes the use of electric cars where the development provides car parking or increased vehicles on borough's roads and requires for example, new development to provide infrastructure for electric vehicle charging. This will help reduce air quality emissions in the borough and is therefore considered to have a significant positive effect.
	Significant positive	SA9: The policy fully supports the achievement of this objective and key sustainability issues as an accelerated up take of electric vehicles and ultra-low emission vehicles will help reduce air quality in the borough. It is therefore considered to have a significant positive effect.
Policy 74: Assessing, Mitigating and Monitoring Transport Impacts	Significant positive	SA5: This is an overarching transport policy that sets out the documentation to be submitted with new development proposals, to be prepared in line with current best practice guidance e.g. Transport Assessment, site Travel Plan and Construction Logistics Plan (CLP). It is therefore considered that the policy supports the objective and relevant key sustainability issues and is likely to have a significant positive effect.
	Significant positive	SA9: The policy fully supports the achievement of this objective and addresses some key sustainability issues as its purpose it to assess, mitigate and monitor transport impacts of development. It is therefore considered to have a significant positive effect.
Policies 75 and 76: Utilities and Digital Infrastructure	Significant positive	SA20: Both policies are likely to contribute to SA20 as improved digital infrastructure in particular will help create new employment opportunities which is likely to encourage economic growth as well as maintaining stable levels of employment in the Borough. These policies will support existing businesses and new investment, particularly the digital policy and are considered to contribute a significant positive effect to helping maintain stable levels of employment.

## 7.14 Enhancing and Preserving our Heritage

Table 25: Summary of Potential Significant and Uncertain Effects for Enhancing and Preserving our Heritage

Local Plan Policy	Potential Effect	Potential Significant Effects Description
Policies 77 and 79: Designated Heritage Assets and Conservation Areas	Uncertain	SA17: The policies relate directly to the protection, conservation and enhancement of the Borough's designated heritage assets and Conservation Areas and fully supports the achievement of this objective and all relevant key sustainability issues. This is positive, however, as the policies allow for some harm i.e. loss of a designated heritage asset or demolition of any building in a Conservation Area then the overall effects could be uncertain.
	Significant positive	SA18: The policy aims to protect and enhance the Borough's identity and sense of place and in relation to Conservation Areas it specifically states for example, that the Council will permit development which 'preserves or enhances the character or appearance of the area'. This supports the achievement of this objective (SA18) and the policy also supports the key sustainability issue as it promotes and permits development which secures optimum viable use of a site along with development which enhances the character or appearance i.e. the vitality of the area. Consequently, it is considered to have a significant positive effect if new development achieves the policy objectives and this sustainability objective.
Policy 78: Listed Buildings	Significant positive	SA16: This policy supports the achievement of this objective and addresses the relevant key sustainability issues and could result in a potentially significant positive effect. The specific policy criteria make clear the importance of maintaining and improving local distinctiveness through for example, the reinstatement of historic building features and the respecting the setting of nearby buildings. The policy further states how this work should be carried out using traditional, historic or original material, employing specialist advice and craftsmanship. It is therefore considered to have a significant positive effect.
	Significant positive	SA17: The policy fully supports the achievement of this objective and would address all relevant key sustainability issues. For example, the policy states that all proposals for Listed Buildings should seek to conserve and enhance significance by retaining, repairing and (where appropriate) reinstate historic features and fabric. It is therefore be considered to have a significant positive effect.
Policy 80: Archaeological Priority Zones	No potential	no potential significant or uncertain effects have been predicted for this policy.
Policy 81: Non-Designated Heritage Assets	Significant positive	SA16: The policy protects non-designated heritage assets and it states how there will be a strong presumption in favour of their retention and sympathetic maintenance and enhancement. This demonstrates how the policy supports the achievement of this objective (SA16) and addresses the relevant key sustainability issues and is therefore considered to have a potentially significant positive effect.

	Significant positive	SA17: The policy fully supports the achievement of this objective (SA17) and all relevant key sustainability issues and is therefore considered to have a significant positive effect. It makes it clear how proposals to alter or extend an asset should ensure the character and setting of the building or asset is maintained or enhanced and that any proposals which would involve the demolition of, or drastic alterations to these properties is resisted.
Policy 82: Locally Listed Buildings	Significant positive	SA16: The policy seeks to protect and retain locally listed buildings, recognising their architectural and historic interest that makes them significant to the borough. Any alterations or extensions to locally listed buildings will be expected to achieve a high standard of design, paying close attention to the special interest of the locally listed building and its setting. This will contribute to maintaining and improving local distinctiveness and preserving local character and history. The policy supports the achievement of this objective and key sustainability issues and is therefore considered to have a significant positive effect.
	Significant positive	SA17: The policy seeks to protect and retain locally listed buildings, recognising their architectural and historic interest that makes them significant to the borough. Total loss of locally listed buildings will be strongly resisted. This exemplifies how the policy fully supports the achievement of this objective and some key sustainability issues and is therefore considered to have a significant positive effect.
Policy 83: Highams Area of Special Character	Significant positive	SA17: The policy protects the Highams Area of Special Character which has local architectural and historic significance and any development proposals will be expected to pay close attention to the area's defined character. This will contribute to conserving and enhancing the historic built environment within the Highams Area of Special Character and some key sustainability issues. It is therefore predicted to have a significant positive effect.

## 7.15 Protecting and Enhancing the Environment

Table 26: Summary of Potential Significant and Uncertain Effects for Protecting and Enhancing the Environment

Local Plan Policy	Potential Effect	Potential Significant Effects Description
Policy 84: Green Infrastructure and the Natural Environment	Significant negative	SA15: This policy directly refers to the Green Belt and Metropolitan Open Land (MOL), detailing the criteria which development on this land must meet. However, this policy does not entirely rule out future development within the Green Belt and instead relies on "national policy and the London Plan" to prevent development within the area. Development on this land would have permanent effects, which cannot be mitigated against. For this reason, a significant negative effect has been recorded for this SA objective.

Policy 85: Open Spaces, Sport and Recreation	Significant positive	SA15: The implementation of this policy has the potential to cause a significant positive effect on this SA objective. Open space provision would be assessed for new housing development sites, and adequate new space created where this is lacking. Development on parks already existing within the Borough would be prevented, as well as development which could alter the setting of these areas. Facilities surrounding open space would also be encouraged, such as toilets and cafes, which may help to improve the quality of these spaces for those using them. For these reasons, a potential significant positive effect is recorded for this SA objective.
Policy 86: Biodiversity and Geodiversity	Significant positive	SA14: The implementation of this policy has the potential for a significant positive effect on SSSI and Natura 2000 sites. It aims to ensure the protection of such sites through methods such as a biodiversity survey, and limits harmful developments within these areas. This is expected to aid in the recovery of these sites. For this reason, a potential significant positive impact has been recorded for this SA objective.
	Significant positive	SA16: This policy has potential to result in a significant positive effect on this SA objective. Through the protection of nationally and locally recognised sites, such as Walthamstow Wetlands, Waltham Forest may be maintained or enhanced as an attractive and distinctive place to live, work and visit. Therefore, an indirect significant positive effect has been recorded.
Policy 87: The Lee Valley Regional Park and Epping Forest	Uncertain	SA1: This policy seeks to protect Lee Valley and Epping Forest Natura 2000 sites from potential effects of development. This policy may therefore conflict with the achievement of this SA objective. HRA screening has identified potential significant effects from housing development on the Natura 2000 sites. This will be investigated within the Local Plan HRA which will be available later in 2019.
Policy 88: Waterways	Uncertain	SA13: This policy has the potential for a minor positive effect on this SA objective. Through considering Flood Defence Consent, development should address flooding risk from future climate change events. However, it is unclear how close “adjacent” sites to water courses will have to be to fall under the remit of this policy. For this reason, an uncertain impact has been recorded.
Policy 89: Food Growing and Allotments	No potential significant or uncertain effects have been predicted for this policy.	

## 7.16 Ensuring Climate Change Resilience

Table 27: Summary of Potential Significant and Uncertain Effects for Ensuring Climate Change Resilience

Local Plan Policy	Potential Effect	Potential Significant Effects Description
Policy 90: A Zero Carbon Borough	Significant positive	SA7: The policy strongly advocates a zero-carbon borough and sets out a number of policy criteria which developments should meet to maximise energy efficiency and reduce the borough's carbon footprint. For example, Criteria B requires all major development proposals to prepare an energy assessment, and strongly encourages all minor non-residential developments to prepare one too. The policy fully supports the achievement of this objective and key sustainability issues and is considered to have a significant positive effect.
	Significant positive	SA8: The policy strongly advocates a zero-carbon borough and sets out a number of policy criteria which developments should meet to maximise energy efficiency and reduce the Borough's carbon footprint. For example, Criteria B requires all major development proposals to prepare an energy assessment, and strongly encourages all minor non-residential developments to prepare one too. The policy fully supports the achievement of this objective and key sustainability issues and is considered to have a significant positive effect.
	Significant positive	SA11: The policy seeks to minimise greenhouse gas emissions, reduce the borough's carbon footprint and maximise energy efficiency within developments which will all improve the borough's resilience to climate change and help reduce the risk of flooding. It is therefore considered to have a significant positive effect.
Policy 91: Decentralised and Renewable Energy	Significant positive	SA7: The policy requires new development to maximise its use of decentralised energy systems which will increase lower carbon heating efficiency and help decrease carbon emissions in the borough. This fully supports the achievement of this objective and key sustainability issues. It is therefore considered to have a significant positive effect.
	Significant positive	SA8: The policy promotes the adoption of decentralised energy systems and major developments as defined in the policy criteria will be expected to install communal heating systems and connect to decentralised energy networks. This fully supports the achievement of this objective and key sustainability issues. It is therefore considered to have a significant positive effect.
Policy 92: Sustainable Design and Construction	Significant positive	SA6: The policy promotes sustainable design and construction, and this includes minimising waste during the construction and operations phases of development as shown in Criteria H. Criteria I of the policy also requires new development to provide a clear strategy of adequate waste and recycling storage and collection facilities. It is therefore considered to fully support the achievement of this objective and address key sustainability issues and to have a significant positive effect.
	Significant positive	SA7: The policy promotes sustainable design and construction and includes a number of criteria that will help reduce greenhouse gas emission and promote low carbon growth. For example, Criteria J of the policy supports the low carbon retrofitting of existing buildings to reduce carbon emissions and Criteria F requires all built development to achieve at

		least a 35% on site carbon reduction below Part L 2013 of the Building Regulations. It is therefore considered to have a significant positive effect.
	Significant positive	SA8: The policy promotes and supports low carbon sustainable development and sets out a number of criteria of how the sustainable delivery of development can be achieved. It is therefore considered to have a significant positive effect.
Policy 93: Air Pollution	Significant positive	SA9: The policy requires that new development mitigates any adverse air pollution impacts and sets out criteria of how this can be achieved. This includes the need to undertake Air Quality Assessments for certain types of development. The policy fully supports the achievement of this objective and addresses key sustainability issues and is therefore considered to have a significant positive effect.
Policy 94: Water	Significant positive	SA10: The policy promotes the efficient use of water and requires that new development should prevent any adverse impacts on water quality and water supply. Criteria B of the policy states that new development should introduce water efficiency measures. The policy also recognises how an increasing population will put a strain on water resources, for example, Criteria E states how new development should protect existing water and sewerage infrastructure and manage pressure on combined sewer networks. It is therefore considered to have a significant positive effect.
Policy 95: Contaminated Land		No potential significant or uncertain effects have been predicted for this policy.
Policy 96: Managing Flood Risk	Significant positive	SA11: The policy relates specifically to how development should manage flood risk and sets out a number of criteria of how this can be implemented. It fully supports the achievement of this objective and addresses key sustainability issues and is therefore considered to have a significant positive effect.
Policy 97: Overheating	Significant positive	SA8: The policy sets out criteria for how overheating can be prevented. For example, Criteria A states how optimising the layout, orientation, materials, technology and design of new development to minimise any adverse impacts on internal and external temperature, reflection, over-shadowing, micro-climate and wind movement. The policy promotes the construction of energy efficient buildings and is therefore predicted to have a significant positive effect.

## 7.17 Promoting Sustainable Waste Management

Table 28: Summary of Potential Significant and Uncertain Effects for Promoting Sustainable Waste Management

Local Plan Policy	Potential Effect	Potential Significant Effects Description
Policy 99: Waste Management	Significant positive	SA6: The policy specifically relates to the sustainable management of waste and sets out how the borough can achieve this. For example, Criteria D encourages new development to include adequate and well-designed internal and external storage facilities for residual waste and recycling. The policy fully supports the achievement of this objective and addresses key sustainability issues including the need to increase recycling and recovery and is therefore considered to have a significant positive effect.
Policy 100: Infrastructure and Developer Contributions	No potential significant or uncertain effects have been predicted for this policy.	
Policy 101: Monitoring and Promoting the Achievement of Growth Targets	Significant positive	SA18: The policy monitors and promotes the achievement of growth targets relating to housing, affordable housing, employment space and retail space. The delivery of these developments will contribute to maintaining and enhancing the vitality of the borough's town centres. It is therefore predicted to have a significant positive effect.
	Significant positive	SA19: The policy monitors and promotes the delivery of employment space and sites to ensure the related targets are met. If these sites are delivered it will improve the local economy and is therefore predicted to have a significant positive effect.
	Significant positive	SA20: The policy monitors and promotes the delivery of employment space and sites to ensure the related targets are met. If these sites are delivered, then it will create employment opportunities that will contribute to maintaining stable levels of employment in the borough. It is therefore predicted to have a significant positive effect.

# 8 Potential Cumulative Effects

## 8.1 Introduction

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

- 8.2 Potential cumulative effects which could occur as a result of policies within the draft Local Plan;
- 8.3 Potential cumulative effects which could occur in combination with other plans and projects.

## 8.2 Cumulative Effects - Local Plan Policies

This section considers the potential cumulative effects which may result from the implementation of the proposed Local Plan policies. Below are some general cumulative effects which are predicted to occur.

General/overarching cumulative effects of the Local Plan Policies

1. The proximity of some strategic locations to one another could lead to high density of development in some areas of Waltham Forest. Leytonstone town centre and South Leytonstone both border each other, as do Walthamstow Central, Forest Road Corridor and Wood Street. This is likely to cause increased strain on public transport, as residents and workers will all need access to different parts of the Borough (or beyond) for employment and recreation. Although some transport improvement is detailed within specific plan policies, this will have to be coordinated and mindful of development throughout the borough, in order to prevent a significant negative effect on SA5: Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system, reducing car use for all journey lengths.
2. Several strategic locations are situated adjacent to or include land within flood zones 2 and 3. This works against SA11: Reduce the risk of flooding and improve resilience to climate change. Although some mitigation could be sought through Sustainable Drainage Systems (SuDS) and Flood Risk Assessment (FRA), it should be considered that using this method in multiple locations is unlikely to mitigate all effects of flooding. Furthermore, the proposed increase in development intensity is likely to increase surface water run off (due to an increase in impermeable surfaces), which could worsen the flood risk in previously identified and new areas of the Borough.
3. It is possible that development within Waltham Forest could lead to increased pressure on and loss of important locally and internationally designated wildlife sites. There are currently SSSIs, SPAs and Natura 2000 sites all located within the Borough. The development of multiple sites throughout the Borough could therefore have potential significant negative effects on the protected sites and biodiversity of Waltham Forest.
4. A significant positive cumulative effect has been identified for SA1 (Meet local housing needs through the provision of a range of tenures and sizes of new dwellings) objective, resulting from the combination of policies 75 (Utilities infrastructure), 76 (Digital Infrastructure) and policy 62 (Delivering High-Quality Design). The combination of the aforementioned policies should help to increase the quality of new homes developed, ensuring that adequate infrastructure is included in the designs for future housing proposals.

### 8.3 Potential Cumulative Effects with Other Plans and Projects

This section details the potential effects which could arise from the implementation of the Local Plan spatial strategy working in combination with growth planned in neighbouring areas (Table 29) and with projects coming forward within the Borough (Table 30).

Table 29: Potential Cumulative Effects with Other Plans

Local Authority	Proposed Growth	Potential cumulative effects with Waltham Forest Local Plan
London Borough of Enfield	<p>A new Local Plan is being prepared and reviewed in response to consultation comments received between December 2018 and February 2019. It is predicted that Enfield's population could exceed 400,000 by 2032.</p> <p>The extant Core Strategy<sup>42</sup> plans for growth concentrated in town centres and on previously developed land in the south and east of the Borough. Up to 2026 the plan aims to deliver approximately 11,000 new homes and the number of jobs will increase by a minimum of 6,000. Large scale growth and regeneration will be focused in four broad locations - Central Leaside and North East Enfield in the Upper Lee Valley, the area around the North Circular Road at New Southgate and the Borough's major town centre - Enfield Town.</p> <p>The strategic objectives for Enfield are to strengthen retail, public services and employment, protecting biodiversity, reducing the borough's carbon footprint, enhancing quality of life and living environments and reducing the need to travel, all of which are likely to result in sustainability positive effects.</p>	<p>The current spatial strategy in Enfield concentrates growth in areas which border Waltham Forest. Ponders End, Meridian Water and Edmonton are all in the east of the Borough of Enfield and could potentially combine with potential effects of growth to the east of LB Waltham Forest such as the North Circular Corridor, Sewardstone Road and North Chingford strategic locations.</p> <p>Traffic levels are high within Waltham Forest and the entire borough is an AQMA. The A110 and A406 (North Circular) in Waltham Forest also pass through Enfield borough. Traffic generated in Enfield may contribute to traffic in Waltham Forest and population growth, despite investment in public transport and aims to create sustainable communities, could potentially exacerbate this. A potential uncertain cumulative effect is therefore identified in relation to SA9 (air quality).</p> <p>The part of the Lee Valley SPA/Ramsar site which is located within LB Waltham Borough is called the 'Walthamstow Wetlands'. Walthamstow Wetlands was opened to the public in 2017 and is London's largest urban wetland nature reserve. Public access to the Wetlands is managed. With growth in both Enfield and within the west of Waltham Forest Borough, there is potential for a cumulative negative effect on the Lee Valley SPA/Ramsar site, but it is too early to tell whether the opening of the site will have any detrimental effect on its integrity. No monitoring data is available yet. Therefore, a significant cumulative effect is identified with regards to SA14 (protect the ecological integrity of SSSI and Natura sites) as well as an</p>

<sup>42</sup> The Enfield Plan Core Strategy 2010-2025 Adopted November 2010

Local Authority	Proposed Growth	Potential cumulative effects with Waltham Forest Local Plan
		uncertain cumulative effect is identified in relation to SA9 (air quality). This will need to be investigated as part of the AA of the Waltham Forest Local Plan which will be available in autumn 2019.
Haringey	<p>Strategic Policies were adopted by the council in 2013, to replace the Unitary Development Plan (UDP), with subsequent alterations adopted on the 24 July 2017<sup>43</sup>. The plan aims to deliver a minimum 19,800 net new homes over the plan period to 2026. The Council's overall strategy for managing future growth in Haringey is to promote the provision of homes, jobs and other facilities in the areas with significant redevelopment opportunities at, or near, transportation hubs, and support appropriate development at other accessible locations, with more limited change elsewhere.</p> <p>The Tottenham Hale Area of Growth is located to the east of the borough, close to the Lee Valley Regional Park and the boundary with Waltham Forest.</p>	<p>With growth in both Haringey and Waltham Forest there is potential for a significant cumulative negative effect on the Lee Valley SPA/Ramsar site with regards to recreational pressure and water supply.</p> <p>Potential investments and policies to improve walking and cycling in both Haringey and Waltham Forest could help to limit any increase in air pollution which could result from population growth predicted. However, it is not certain that growth in both boroughs would not increase air pollution which could increase nitrogen deposition on the Lee Valley SPA and Ramsar site which lies on the boundary between the two boroughs. Therefore, an uncertain cumulative effect is identified in relation to SA9 (air quality) and potential significant cumulative (in combination) negative effects are identified with regards to SA14 (protect the ecological integrity of SSSI and Natura sites). This will need to be investigated as part of the AA of the LBWF Local Plan which will be available in autumn 2019.</p>
London Borough of Hackney	<p>LB Hackney Council is developing a new Local Plan (LP33), which currently undergoing final public examination prior to adoption later in 2019. The draft Local Plan includes an objective to deliver up to 26,250 additional homes and 23,000 new jobs. Mixed used development with residential, employment, retail, leisure and community facilities will be focused in the designated town centres of Dalston and Hackney Central, and in Shoreditch (none of which are close to the boundary with Waltham Forest). New office development will be directed to the most sustainable locations in the Borough, including within the City Fringe Opportunity Area and the borough's Town Centres to support Hackney's economy. Mixed used, housing led development will be encouraged along the borough's key corridors (including Lea Valley Edge which borders Waltham Forest). This development</p>	<p>The A104 and A12 pass between the boroughs of Waltham Forest and Hackney. Despite planned investments and policies promoting sustainable development in both boroughs it is possible that traffic could increase with the growth proposed in both boroughs. An uncertain cumulative effect is therefore identified in relation to SA9 (air quality).</p> <p>With growth in both Hackney and Waltham Forest there is potential for a significant cumulative negative effect on the Lee Valley SPA/Ramsar site in relation to recreation pressure and water supply. An uncertain cumulative effect is identified with regards to SA14 (protect the ecological integrity of SSSI and Natura sites). This will be investigated as part of the AA of the LB Waltham Forest Local Plan which will be available in autumn 2019.</p>

<sup>43</sup> Haringey's Local Plan 2013 – 2026 (formerly the Core Strategy) March 2013 consolidated with alterations since 2017

Local Authority	Proposed Growth	Potential cumulative effects with Waltham Forest Local Plan
	<p>is intended to deliver improvements to the public realm, new community facilities and other measures that promote healthy streets that easily link different neighbourhoods, open spaces public transport hubs, and civic areas by walking and cycling.</p>	
<p>London Borough of Newham</p>	<p>The Newham Local Plan was adopted in December 2018 to replace the previous Core Strategy and Detailed Sites and policies Development Plan Document. The new plan covers a 15year period to 2033<sup>44</sup>. The Local Plan aims to deliver a minimum of 43,00 new homes by 2033, as well as up to 60,000 new jobs.</p> <p>Development of high density, mixed use and sustainable in terms of location and design are encouraged throughout Newham, but particularly in the following strategic locations:</p> <ul style="list-style-type: none"> <li>(a) Stratford and West Ham</li> <li>(b) Royal Docks</li> <li>(c) Canning Town and Custom House</li> <li>(d) Beckton</li> <li>(e) Urban Newham</li> </ul>	<p>No potential cumulative effects have been identified. The Forest Gate growth area in LB Newham is promoted as a town centre for regeneration by the Newham Local Plan. A total of 7856 new dwellings are required to be developed within urban Newham by 2033, which could lead to increased traffic and demands on public transport. However, the LB Waltham Forest spatial strategy includes strong policies for the strategic locations to the south of Waltham Forest which should help to strengthen these locations (Leyton and South Leytonstone) and discourage residents from travelling south to Forest Gate to access services, facilities and employment.</p>
<p>London Borough of Redbridge</p>	<p>The Redbridge Local Plan was adopted in March 2018. It aims to deliver up to 17,237 new homes across the borough<sup>45</sup>. The Local Plan directs new development including new homes, shops, businesses, leisure facilities and infrastructure to:</p> <ul style="list-style-type: none"> <li>(a) The borough's Investment and Growth Areas of: i Ilford; ii Crossrail Corridor; iii Gants Hill; iv South Woodford; and v Barkingside.</li> <li>(b) The borough's main town centres.</li> <li>(c) Other identified Opportunity Sites.</li> </ul> <p>The objectives of the Local Plan include increasing energy efficiency, encouraging sustainable patterns of transport, improving access to employment, supporting the strategic</p>	<p>The South Woodford Growth Area is located within the west of Redbridge borough, close to the boundary with Waltham Forest. So too is the town centre of Wanstead where growth will also be directed.</p> <p>Traffic levels are high within Waltham Forest and the entire borough is an AQMA. The A12 and North Circular roads pass through Redbridge and Waltham Forest boroughs. Traffic generated in Redbridge may contribute to traffic in Waltham Forest and population growth could potentially exacerbate this, despite investment in public transport and policies within the Waltham Forest Local Plan to improve air quality. An uncertain cumulative effect is therefore identified in relation to SA9 (air quality).</p>

<sup>44</sup> Newham Local Plan, 2018-2033, adopted December 2018

<sup>45</sup> Redbridge Local Plan 2015 - 2030

Local Authority	Proposed Growth	Potential cumulative effects with Waltham Forest Local Plan
	<p>industrial Locations in the borough, and protecting conditions for biodiversity.</p>	<p>Growth within Redbridge borough could contribute to recreational pressure on the Epping Forest SAC, a part of which is located on the boundary between the two boroughs. This could potentially combine with increased recreational pressure from growth in Waltham Forest. A potential significant negative cumulative (in combination) effect is therefore identified in relation to SA14 (protect the ecological integrity of SSSI and Natura sites).</p>
<p>Epping Forest District</p>	<p>The adopted Local Plan is dated 2006. An updated Local Plan has been prepared for the period 2011-2033 (Submission version dated December 2017) which made provision for a minimum of 11,400 new homes through:</p> <ul style="list-style-type: none"> <li>• The creation of Garden Town Communities around Harlow;</li> <li>• Development of previously developed land and some open space land within existing settlements;</li> <li>• Development of previously developed land within the Green Belt; Greenfield/Green Belt land on the edge of settlements;</li> <li>• Development of some grades of agricultural land; and</li> <li>• Development of some smaller sites in rural communities.</li> </ul> <p>Most development is to be directed to Harlow (circa 3,900 new homes), followed by Epping (1305), Loughton (1021), Waltham Abbey (858) and North Weald Basset (1050).</p> <p>Following examination, the Inspectors report (dated 2<sup>nd</sup> August 2019) concluded that the Local Plan is not currently sound and requires further major modifications before it can be accepted. Issues include air quality and recreation/urbanisation effects on Epping Forest SAC identified within the plan HRA which require further investigation and mitigation.</p>	<p>The draft spatial strategy in Epping Forest District directs the majority of development to settlements which are not on the boundary with Waltham Forest. Nevertheless, some development is directed to Loughton and Waltham Abbey in the south of Epping Forest District, and smaller scale development may also occur in smaller settlements in that area.</p> <p>Work is underway to further investigate and develop mitigation to address the potential negative effects on the integrity of Epping Forest SAC with regards to air quality and recreation/urbanisation resulting from growth in Epping Forest district. Such effects could potentially combine with the effects of growth in Waltham Forest (and other neighbouring local authorities). Potential significant negative cumulative (in combination) effects are therefore identified in relation to SA14 (protect the ecological integrity of SSSI and Natura sites) and SA9 (air quality).</p> <p>These potential effects will need to be investigated as part of the AA of the LBWF Local Plan which will be available in autumn 2019.</p>
<p>The London Plan, 2016</p>	<p>The London Plan recognises the deprivation within Waltham Forest, and clearly sets out strategy to deal with this. For example, the London Legacy Development Corporation (LLDC), which involves several local authorities having a coordinated</p>	<p>There is potential for a cumulative positive effect to result from the implementation of the Waltham Forest Local Plan working in combination with the London Plan in relation to SA1 (housing), SA3 (health), SA19 (local economy) and SA20 (employment). Both plans</p>

Local Authority	Proposed Growth	Potential cumulative effects with Waltham Forest Local Plan
	response to issues in the area surrounding the Queen Elizabeth Olympic Park.	recognise the need to channel investment into Waltham Forest, in order to regenerate areas of the Borough which currently do not adequately serve local people.

Table 30: Potential Cumulative Effects with Other Projects

Project	Description	Potential cumulative effects with Waltham Forest Local Plan
Crossrail 1 and Crossrail 2	LB Redbridge will benefit from the first phase of Crossrail which is currently being built. LB Enfield, Haringey and Hackney as well as Waltham Forest will benefit from Crossrail 2 which is currently in the planning stages. There is some uncertainty over the delivery of Crossrail 2 which, if it goes ahead, would be operational in the 2030s. Crossrail 2 will bring opportunities for more economic growth within the boroughs which contain the route and in neighbouring areas such as Waltham Forest, if public transport links to the Crossrail 2 stations can be provided.	Potential significant positive cumulative effects are likely to result from the combination of growth as set out within the Waltham Forest spatial strategy and the Crossrail projects, particularly Crossrail 2, in relation to SA5 (access) and SA20 (employment). Growth directed to the Sewardstone Road and North Circular Corridor/Meridian Water Extension and Blackhorse Lane should benefit from increased accessibility to public transport, increased access to central London, support to the local economy and increased job opportunities. Development toward the south east of the Borough could also benefit from Crossrail 1.
Deephams Sewage Works, Edmonton	From 2017 to 2019, £250 million was invested into the sewage treatment works to expand the service offer to more residents across London. This has been done to achieve a higher effluent quality, as well as decrease odour emissions from the site.	<p>Although just outside Watford Borough, this project has the potential to work in combination with the Waltham Forest Local Plan to positively affect the South West of Waltham Forest.</p> <p>Odour emissions from the site have been decreased, which is likely to improve the living environment of those around Edmonton as well as areas of the Lee Valley, such as William Girling Reservoir. The quality of effluent emitted into the River Lee will be comparably better compared with before the works were completed, which is likely to improve both the river itself as well as the environment surrounding it. This may enhance local open space within Waltham Forest.</p> <p>Invasive species management has been carried out in the areas such as Japanese knotweed, which should help to prevent the spread of such species within Waltham Forest. Hence, a potential positive cumulative effect has been identified in relation to SA10 (water), SA9 (air quality) and SA13 (biodiversity and geodiversity).</p>

<p>North London Heat and Power Project</p>	<p>The North London Heat and Power Project is a decade long project to create a plant able to deal with non-recyclable waste through combustion, to produce low carbon energy in the form of heat and steam.</p>	<p>This Edmonton based project borders the West of Waltham Forest Borough, close to the Lee Valley Regional Park. This project may work in combination with the Waltham Forest Local Plan in order to positively affect several of the SA objectives:</p> <ul style="list-style-type: none"> <li>- Climate change resilience (SA7) may be improved through the reduction in carbon emissions related to waste management;</li> <li>- Air quality improvement (SA9) is a key objective of this project, which is likely to improve the nearby air quality in nearby Boroughs such as Waltham Forest;</li> <li>- 2,500 jobs created through the construction of the plant could help to employ those living within Waltham Forest (SA20).</li> <li>- 325 local apprenticeships and skills training opportunities could provide local education for young people (SA20).</li> <li>- The environment surrounding Edmonton may be improved by this project, thus the air quality in the Lee Valley Regional Park could be improved. Not only would the environment be improved, but so would the quality of open space available to those living within Waltham Forest (SA9, SA13 and SA15).</li> <li>- Waste management needs will also be met for residents in areas surrounding the project (SA6).</li> </ul>
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# 9 Mitigation and Enhancement Measures

## 9.1 Mitigation

This section details mitigation for uncertain and significant negative effects of the Draft Local Plan.

Table 31: Proposed mitigation measures for the Draft Local Plan

Theme	Policy	Explanation and Mitigation Measures to Minimise or Avoid Effects
Spatial Strategy	1, 2, 3	SA14: The HRA of the Local Plan will determine whether this policy, in combination with other policies within the Local Plan, could result in adverse effects on Natura 2000 sites. This will be updated once HRA results are available, which will give further clarity on the uncertain and significant negative effects identified.
	3	SA13: The inclusion of the term "existing green space" within criterium D may help to ensure that all green space is protected from development rather than solely space which is already protected. This may help to modify the potential significant negative effect identified into a minor positive effect.
South Waltham Forest	11 (Whipps Cross)	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 they do not compromise the area's contribution to the Green Belt purposes. This should help to mitigate the identified significant negative effect identified.
Central Waltham Forest	Central Waltham Forest	SA14: The HRA of the Local Plan will determine whether this policy, in combination with other policies within the Local Plan, could result in adverse effects on Natura 2000 sites. This will be updated once HRA results are available, which will give further clarity on the significant negative effect identified.
North Waltham Forest	17	SA11: FRA is required to demonstrate that 900 homes can be delivered within the North Circular Corridor strategic location without increasing flood risk. This could assessment could help to mitigate the uncertain effect identified by providing more clarity on the suitability of sites.
	17	SA14: The HRA of the Local Plan will determine whether this policy, in combination with other policies within the Local Plan, could result in adverse effects on Natura 2000 sites. This will be updated once HRA results are available, which will give further clarity on the negative effect identified.
	18	SA20: Strengthening or intensification of current Borough Employment Areas in line with population increase could be covered within the policy which would help to provide more jobs within close proximity of this strategic location. This should help to mitigate the significant negative effect identified.
	21	SA19 and SA20: The addition of employment land protection to this policy may help to ensure that new residents of the 450 new homes will be able to find employment within the Borough. Intensification of current employment land could help to increase employment space.
	22	SA11: FRA is required to demonstrate that 900 homes can be delivered within this strategic location without increasing flood risk. This assessment would help to add clarity, thus could mitigate the uncertain effect identified.
Decent homes for everyone	23	SA11: The policy could be enhanced to achieve a positive effect for SA11 if it states how housing development should be prioritised in areas where there is a low flood risk, unless the development meets the criteria for developing in a high risk flood zone as set out in Policy 94 Managing Flood Risk. This should mitigate the identified uncertain effect.
	30	SA12: To enhance the sustainability performance of the policy, the policy wording could make it clear that the development of brownfield land is favoured over greenfield land. This would help to mitigate the uncertain effect identified.

	23, 31	SA14: The HRA of the Local Plan will determine whether this policy, in combination with other policies within the Local Plan, could result in adverse effects on Natura 2000 sites. This will be updated once HRA results are available, which will give further clarity on the uncertain identified.
	31	SA12 and SA15: To enhance this policy in relation to SA12 it is recommended that the policy specifies that infill development applies to brownfield land rather than greenfield land. Similarly, the policy should make reference to greenbelt land and open spaces to support SA15, thus mitigating any potential negative effects. Policies 84: Green Infrastructure and the Natural Environment, Policy 85: Open Spaces, Sport and Recreation and policy 86: Biodiversity and Geodiversity should also help to prevent the development of key greenfield sites.
Building a Resilient and Creative Economy	42	SA18: A spatial map of current or proposed Creative Enterprise Zones would add certainty to the assessment of this policy, and it is therefore recommended that this is added to the supporting text of the policy. The addition of a requirement for Creative Enterprise Zones to be developed within Town Centre areas could help to ensure that town centre vitality is maintained. These measures could help to mitigate the identified uncertain effect.
Sustainable Transport and Infrastructure	70	SA14: The HRA of the Local Plan will determine whether this policy, in combination with other policies within the Local Plan, could result in adverse effects on Natura 2000 sites. This will be updated once HRA results are available, which will give further clarity on the uncertain identified.
Enhancing and Preserving our Heritage	77, 79	SA17: No mitigation has been identified for the uncertain effect on heritage assets resulting from these policies. As the policies allow for some development of such assets within the Borough to occur, it is not fully understood at this stage how the heritage of Waltham Forest as a whole may be affected.
Protecting and Enhancing the Environment	84	SA15: There is potential for a significant negative effect on SA15 to arise due to a lack of clear criteria setting out which circumstances development could be permitted under; this could result in the permanent loss of greenfield and Green Belt land, which could not be mitigated. Currently, the London Plan, which this policy appears to rely on for deciding development, will allow it if the development fits the Local Plan policies. This could lead to confusion as well as the development of areas which are not best suited, or which could be irreversibly changed. Clearly stating the other policies to which this policy refers would add clarity to the policy and could prevent the permanent loss of greenfield and Green Belt land.
	87	SA1: The Local Plan HRA, when available later in 2019, will identify mitigation required to ensure that housing development can be delivered in a way which avoids adverse effects on Natura 2000 sites.
	88	SA13: Biodiversity and climate change resilience- Rewording of point 2 to include all developments undergoing Flood Defence Consent (FDC) could help to ensure all development is adequately prepared for the risk of flooding, especially that resulting from climate change. This could help to mitigate the identified uncertain effect.

## 9.2 Enhancements

This section details ways in which the Draft Local Plan policies could be altered, in order to enhance an identified minor positive effect, or modify a minor negative effect to minor positive effect.

Table 32: Enhancements Measures

Policy	Enhancement
Policy 3	SA14 and 15: The addition of enhancement of designated sites and spaces to this policy may increase the number of developments which aim to improve local wildlife sites and other open space, thus making the identified minor positive effect a significant one.
Policy 6	SA16: In order to maintain and improve distinctiveness within the borough and to avoid coalescence of distinct settlements within the borough, the policy could require adequate consideration of the need to maintain the character of separate

	distinct parts of the Borough. This could modify the identified minor negative effect to a minor positive effect.
Policy 7	SA3: The policy would perform better if it included the provision of new healthcare facilities within this strategic location which would increase access to healthcare 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. SA4: the policy would perform better if it specifically required improved access to community facilities including a community centre and recreational facilities.
Policy 8	SA3: The policy would perform better if it included the provision of new healthcare facilities within this strategic location which would increase access to healthcare 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.
Policy 9	SA3: The policy would perform better if it included the provision of new healthcare facilities within this strategic location which would increase access to healthcare 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.
Policy 10	SA17: Policy 10 Leytonstone would perform more positively if it included specific protection for Listed Buildings within this strategic location and for historic assets including conservation areas adjacent to the area which could be negatively affected by developments.
Policy 11	SA15: The incorporation of trees and hedgerows within the development could help maintain the natural capital value of the Green Belt. SA19: this policy could perform more positively if it more specifically supported employment developments as well as supporting the redevelopment of the University Hospital.
Policy 13	SA20: The addition of a quota of jobs or employment space to be provided in this area would strengthen the performance of this policy against SA 20 in relation to maintaining stable levels of employment in the Borough, given the large number of dwellings predicted to be developed here.
Policy 15	SA3: If this policy specifically required new healthcare facilities to meet the needs of residents, the policy would perform more positively with regards to health and wellbeing.
Policy 19	SA19 and 20: Improved provision of employment space in this policy would help it perform more positively with regards to supporting the local economy and maintaining and improving employment levels.
Policy 20	SA17: Policy could require design to ensure avoidance of negative effects on and enhancing the setting of the nearby listed buildings within criteria 8.
Policy 21	SA5, SA7 & SA9: The policy could perform more positively with improvements to public transport provision within this strategic location, in order to improve PTAL scores.
Policies 24 and 29	SA8: These policies could be enhanced by promoting the redevelopment of existing housing to be more energy efficient, low carbon and more sustainable to help conserve energy and achieve the objectives of SA8.
Policy 34	It would be helpful for this policy to signpost (i.e. add a footnote) in the policy to where the definitions can be found for 'sheltered accommodation', 'extra care accommodation', 'residential nursing care accommodation'.
Policy 36	It would be helpful for this policy to signpost (i.e. add a footnote) in the policy to where the definitions can be found of 'community led housing', 'self-build' and 'custom build' housing projects.
Policy 59	This policy could be enhanced by stating the development types which this policy applies to within the policy itself. This would add clarity to the policy and its application.
Policy 60	This policy could be enhanced with the addition of the need to make appropriate recycling and waste facilities with the development of new hot food takeaways. This would cause a significant positive effect on SA6: Waste.
Policy 61	It is recommended that this policy is combined with Policy 60: Hot Food Takeaways, as many of the impacts are similar for both policies.

Policy 62	<p>It is recommended that the policy is enhanced to include energy efficient design which will promote the construction of energy efficient buildings. This will strengthen the policy in relation to the achievement of SA8 and link with Draft Local Plan Policies 91: A zero carbon borough and 96: Sustainable Design and Construction. This could enhance the identified potential minor positive effect to a significant positive effect.</p> <p>Similarly, we recommend that the policy is strengthened to promote water efficiency in line with Draft Local Plan Policy 94: Water, in order to mitigate the potential minor negative effect identified in relation to SA10.</p>
Policy 63	<p>SA7: The identified minor positive effect could be enhanced with the addition of low carbon design and by including reference to the supporting Local Plan Policy which specifically relates to zero carbon (Policy 90).</p> <p>We recommend that the policy is enhanced to include energy efficient design and renewable energy generation in greater detail, which will promote the construction of energy efficient tall buildings. This will strengthen the policy and minor positive effect in relation to the achievement of SA8 and link with Local Plan Policies 90: A zero carbon borough and 92: Sustainable Design and Construction.</p> <p>With regards to SA11, it is recommended that Policy 96 is referred to in this policy for more specific design considerations relating to flooding and climate change. This could enhance the potential minor positive effect identified.</p>
Policies 75 and 76	<p>For SA3 and SA4, the policies could be enhanced with the addition of a requirement to address social isolation to ensure that there are adequate community meeting places available and good public realm design to encourage social interaction.</p>
Policy 85	<p>There is potential for part d of this policy to be more effective if placed into Policy 84: Green Infrastructure Network, as this policy already starts to address the provision of and access to open space within the Borough. This could result in a potential significant positive impact for SA15, as both Green Belt and open space would be clearly mentioned in the policy.</p> <p>Clarity could be added to the policy by including a definition or map of open space, to which this policy is referring.</p>
Policy 86	<p>SA13: By specifically defining the spatial extent of “in the vicinity” when referring to biodiversity resources near development sites (paragraph C), clearer decisions could be made about if this policy should be considered prior to development. This may help to ensure that all areas in and around sites of high biodiversity are protected, and that adequate mitigation can be put in place in a timely manner.</p>

# 10 Proposed Monitoring Schedule

## 10.1 Introduction

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

The following monitoring schedule in Table 33 below sets out how the potential effects associated with each of the options within the Waltham Forest Local Plan could be monitored. Following a review of the Waltham Forest Local Plan after the consultation period, it is proposed that this schedule is refined to focus specifically on the monitoring of any residual significant negative or uncertain effects.

**Table 33: Proposed Monitoring Schedule**

Sustainability Theme	Monitoring Indicators
Housing	Annual number of housing completions and percentage of annual targets/projections. Annual number of affordable dwellings delivered and percentage of target.
Climate Change: Flooding	Number of strategic flood risk assessments undertaken. Applications granted contrary to Environment Agency advice. Net change in surface water run-off rates.
Land use and soil	Net loss / gain in designated geological sites. Development requiring compensation and % with appropriate schemes secured. Net loss of best and most versatile agricultural land.
Biodiversity	Net loss / gain of SSSI, Natura 2000 sites, priority habitats and local wildlife sites. Biodiversity enhancement secured through new development. Habitat Regulations Assessments undertaken. Development requiring compensation and % with appropriate schemes secured.
Open Space	Net change in the amount of open space. Financial contributions to open space provision.
Historic Environment	Conservation Area Assessments – Changes in character compared to previous assessments. Change in the number and condition of heritage assets ‘at risk’. Community perception of changes to their settlements.
Town centres	Vacancy rates in town centres.

# 11 Next steps

This SA Report is being published for consultation (after the consultation of the Draft Local Plan) for a 6-week period.

Following consultation on both this report and the Draft Local Plan, comments received on both the Local Plan and this SA Report will be considered. Any necessary changes will be made to the SA Report and to the Local Plan in response to consultee comments.

A publication version of the Local Plan is expected to be published in Spring 2020 and this will be accompanied by an updated version of the SA Report (see Table 34).

Table 34: Waltham Forest Local Plan Timetable

Local Plan Activity	Timeframe
Draft Local Plan Consultation (Preferred Options)	September/October 2019
Consultation comments considered	Autumn/ Winter 2019
Consultation on Proposed Submission Plan	Spring 2020
Local Plan is adopted subject to receipt of the Inspector's Report by Winter (2020/21)	Spring/Summer 2021