



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

Non-Technical Summary



Prepared on behalf of:

Waltham Forest Council

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1 Introduction

This Non-Technical Summary (NTS) summarises the findings of the Sustainability Appraisal (SA) Report for the draft Local Plan being prepared by the London Borough of Waltham Forest (LBWF) Council. The draft Local Plan will guide development in the Borough to 2035 and will replace the existing Local Plan Core Strategy adopted in 2012, which is now considered to be out of date.

ClearLead Consulting Ltd and CAG Consultants were commissioned by LBWF to undertake the SA of the draft Local Plan. The SA Report accompanies the draft Local Plan which sets out the Council's preferred approach to new development up to 2035 and includes draft planning policies.

The draft Local Plan carries forward and builds on the Direction of Travel consultation work undertaken between November and December 2017. During the earlier round of consultation, key planning issues for Waltham Forest were identified and a set of policy directions were put forward as options. The draft Local Plan sets out the preferred policy approach to address the issues identified during the first stage of consultation. These draft Local Plan policies are referred to within this report as spatial strategy policies and thematic policies.

The SA will play an important role in the evolution of the plan and consideration of all reasonable alternatives.

1.1 What is a Sustainability Appraisal?

An SA has been undertaken on the LWBF draft Local Plan as required by the Environmental Assessment of Plans and Programmes Regulations, 2004 (the SEA Regulations). SA is used to evaluate Local Plans against a set of objectives developed in consultation with interested parties. The purpose of the assessment is to avoid adverse environmental, social and economic effects, as well as identifying opportunities to improve the quality of Waltham Forest and the quality of life of residents in the Borough.

This SA sets out the appraisal of the spatial strategy policies and thematic policies considered from the draft Local Plan policies and the potential impact they could have on the three elements of sustainability: economy, environment and society. This work will be further refined for the publication version of the draft Local Plan.

It also sets out the alternative options previously assessed as part of the Direction of Travel consultation work of the strategic options and spatial strategy options.

1.2 Waltham Forest Borough Council Draft Local Plan

The London Borough of Waltham Forest (LBWF) Council are in the process of preparing a new Local Plan to guide development in the Borough. The new Local Plan, when adopted, will replace the currently adopted Core Strategy (2012) for the LBWF.

A new Local Plan is needed as the population in Waltham Forest is expected to grow by 21% by 2050¹. 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.

To date, 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 8th November to 22nd December 2017. The Council is currently developing its evidence base to support the new plan and this Sustainability Appraisal Report has been prepared alongside the draft Local Plan which was consulted on during the period 22nd July to 30th September 2019.

The LBWF Vision as set out in the draft 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.”

1.3 Strategic Objectives of the draft Local Plan

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.

¹ GLA 2015 round population projections

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

Figure 1: Waltham Forest Local Plan Boundary

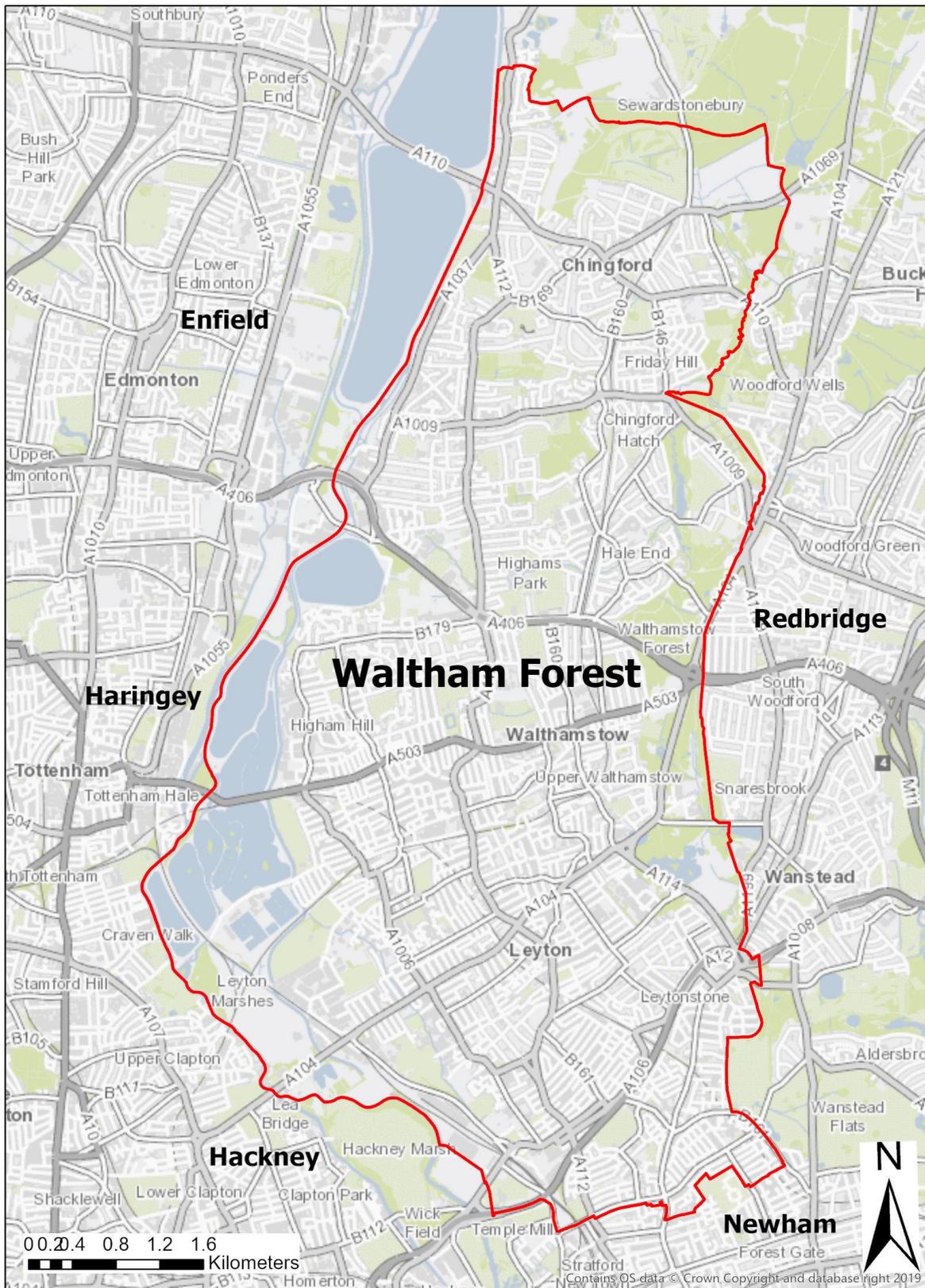


Table NTS1 lists the spatial strategy policies currently included in the First Draft Local Plan and which have been assessed as part of this SA.

Table NTS1: Draft Local Plan Spatial Strategy Policies

Policy number	Policy name
Policy 1	Presumption in Favour of Sustainable Development
Policy 2	Scale of Growth
Policy 3	Location and Management of Growth
Policy 4	Ensuring Good Growth
Policy 5	Encouraging Mixed Use Development and Intensification Mixed Use Development
Policy 6	South Waltham Forest
Policy 7	Lea Bridge and Church Road Strategic Location
Policy 8	Low Hall Strategic Location
Policy 9	Leyton Strategic Location
Policy	South Leytonstone Strategic Location
Policy 10	Leytonstone Strategic Location
Policy 11	Whipps Cross Strategic Location
Policy 12	Bakers Arms Strategic Location
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
Policy 17	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

Table NTS2 lists the thematic policies currently included in the First Draft Local Plan and which have been assessed as part of this SA.

Table NTS2: Draft Local Plan Thematic Policies

Policy number	Policy name
Policy 23	Increasing Housing Supply
Policy 24	Delivering Genuinely Affordable Housing
Policy 25	Affordable Housing Tenure
Policy 26	Housing Size and Mix
Policy 27	Housing Design
Policy 28	Accessible and Adaptable Housing
Policy 29	Redevelopment and Intensification of Existing Housing and Housing Estates
Policy 30	Other Forms of Housing
Policy 31	Small Sites
Policy 32	Housing in Multiple Occupation (HMO) and Conversions
Policy 33	Downsizing
Policy 34	Supported and Specialist Accommodation
Policy 35	Gypsies and Travellers
Policy 36	Community -Led Housing, Self Build and Custom Build Housing
Policy 37	Supporting Economic Growth and Jobs
Policy 38	Safeguarding Employment Land
Policy 39	Managing Change in Designated Employment Areas
Policy 40	Approach to Non-Designated Employment Land

Policy 41	Offices and Workspaces
Policy 42	Creative Enterprise Zone
Policy 43	Local Jobs, Skills and Training
Policy 44	Railway Arches
Policy 45	Promoting Culture and Creativity
Policy 46	Protecting Pubs
Policy 47	Hierarchy of Centres
Policy 48	New Retail, Office and leisure Developments
Policy 49	Revitalisation, Adaptation and Regeneration in Designated Centres and Parades
Policy 50	Managing Changes of Use in Primary Shopping Areas
Policy 51	Managing Changes of Use Outside Primary Shopping Areas of Walthamstow Town Centre and the District Centres
Policy 52	Managing Changes of Use in Neighbourhood Centres and Local Retail Parades
Policy 53	Evening and Night-time Economy Uses
Policy 54	Shopfronts and Signage
Policy 55	Social and Community Infrastructure
Policy 56	Loss of Existing Social or Community Infrastructure
Policy 57	Education and Childcare Facilities
Policy 58	Promoting Healthy Communities
Policy 59	High Quality Environment
Policy 60	Hot Food Takeaways
Policy 61	Betting Shops and Payday Loan Shops
Policy 62	Delivering High-Quality Design
Policy 63	Taller Buildings
Policy 64	Amenity
Policy 65	Designing Out Crime
Policy 66	Advertisements
Policy 67	Liveable Neighbourhoods for All
Policy 68	Walking and Cycling
Policy 69	Public Transport
Policy 70	Deliveries Freight and Servicing
Policy 71	Construction Logistics Plans
Policy 72	Managing Vehicle Travel Traffic
Policy 73	Electric Vehicles
Policy 74	Assessing, Mitigating and Monitoring Transport Impacts
Policy 75	Utilities Infrastructure
Policy 76	Digital Infrastructure
Policy 77	Designated Heritage Assets
Policy 78	Listed Buildings
Policy 79	Conservation Areas
Policy 80	Archeological Priority Zones
Policy 81	Non-Designated Heritage Assets
Policy 82	Locally-Listed Buildings
Policy 83	Highams Area of Special Character
Policy 84	Green Infrastructure and the Natural Environment
Policy 85	Open Spaces Sport and Recreation
Policy 86	Biodiversity and Geodiversity
Policy 87	The Lee Valley Regional Park and Epping Forest
Policy 88	Waterways
Policy 89	Food Growing Allotments
Policy 90	A Zero Carbon Borough
Policy 91	Decentralised and Renewable Energy
Policy 92	Sustainable Design and Construction
Policy 93	Air Pollution
Policy 94	Water
Policy 95	Contaminated Land
Policy 96	Managing Flood Risk
Policy 97	Overheating

Policy 99	Waste Management
Policy 100	Infrastructure and Developer Contributions
Policy 101	Monitoring and Promoting the Achievement of Growth Targets

1.4 What is the current situation in the Draft Plan Area?

In order to test whether the draft Local Plan will contribute to improving the economic, social and environmental situation in Waltham Forest, we need to understand the how things are currently and how they might change without a Local Plan.

Table NTS3 presents this information. This section presents the key sustainability issues currently affecting Waltham Forest and the predicted future evolution of the baseline without the draft Local Plan. This section is supported by Appendix A to the full SA Report which presents the full review of baseline data for the Borough. Appendix B also presents the review of other policies and plans which could have an influence or be affected by the development of the draft local plan.

The initial baseline data was gathered in April-July 2017. This identified data relevant to Waltham Forest, and was placed into the following categories:

- Population;
- Human Health;
- Economy;
- Employment and Skills;
- Transport;
- Crime and Safety;
- Housing;
- Townscape and Heritage;
- Climate;
- Air Quality;
- Soil and Geology;
- Water;
- Biodiversity;
- Landscape; and
- Waste.

This baseline was then consulted on and updated in September 2017 a further brief update was undertaken in 2019. In some cases, the most recent data available, such as Census and SSSI condition data, is now in excess of five years old. This may not therefore reflect current trends within the Borough. No other difficulties have been encountered in collating the baseline data. Some assumptions have been made in the assessments of the Local Plan. These assumptions are detailed within Section 2.5 of the full SA Report.

Table NTS3: Sustainability Issues & Likely Evolution without the Neighbourhood Plan

Theme	Sustainability Issues	Likely Evolution Without the Draft Local Plan
Population	<ul style="list-style-type: none"> • 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. 	<ul style="list-style-type: none"> • There is likely to be an increase in housing demand due the continued population increase within the Borough. • Continuing pressure to provide inclusive services which can meet the needs of all local residents. • An increased demand for healthcare of those over 50.
Human Health	<ul style="list-style-type: none"> • 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 20212). • 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. • 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. 	<ul style="list-style-type: none"> • There may be additional strain placed on the Borough's health and social care resources due to the continual growth of proportion of the population over 50. • The disparity between wards with regards to deprivation, overcrowding and poverty could widen • Mental health issue of residents is expected to increase in severity and incidence, especially in those over 65. This could increase hospital admissions.

² GLA, 2015 Population projections

	<ul style="list-style-type: none"> • 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. 	
<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Economy</p>	<ul style="list-style-type: none"> • 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. 	<ul style="list-style-type: none"> • Pressure on industrial areas to provide business space may increase due to an increase in population and businesses within the Borough. • There may be increased pressure on employment land for housing development, as the population of Waltham Forest continues to rise.
<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Employment and Skills</p>	<ul style="list-style-type: none"> • 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. 	<ul style="list-style-type: none"> • Disparities in employment levels between wards may continue to widen. • Opportunities for new businesses in the area may not arise, preventing an increase in employment and demand for higher educated employees.

	<ul style="list-style-type: none"> • 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. 	
Transport	<ul style="list-style-type: none"> • 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. 	<ul style="list-style-type: none"> • Rise in car ownership is expected to continue • Inadequate electric vehicle infrastructure
Crime and Safety	<ul style="list-style-type: none"> • 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. 	<ul style="list-style-type: none"> • Continued increase in racist and religious hate crime.
Housing	<ul style="list-style-type: none"> • There is a disparity between the cost of housing and the amount that people are able to borrow to purchase a home, which means that many people are unable to access the property market. 	<ul style="list-style-type: none"> • House prices will continue to rise above the London average, making it

	<ul style="list-style-type: none"> • 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. 	<p>increasingly difficult for low income households to purchase property.</p>
<p>Townscape and Heritage</p>	<ul style="list-style-type: none"> • 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. 	<ul style="list-style-type: none"> • Development may encroach on conservation area and could negatively affect townscape and heritage areas, • Assets on the Heritage at Risk register may not be improved in condition.
<p>Climate</p>	<ul style="list-style-type: none"> • 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. 	<ul style="list-style-type: none"> • Greenhouse gas emissions could rise. • Increase in mean annual temperatures.

	<ul style="list-style-type: none"> • Help promote low carbon heat network. • Need to identify opportunities for growth of the low carbon economy in the Upper Lee Valley. 	
Air Quality	<ul style="list-style-type: none"> • 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 NO2 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. 	<ul style="list-style-type: none"> • Air pollution will continue to be an issue. • Vehicle ownership will continue to rise.
Soils and Geology	<ul style="list-style-type: none"> • 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. 	<ul style="list-style-type: none"> • It is unclear if there will be sufficient previously developed land to sustain new development. This could lead to increased development pressure on greenfield sites.
Water	<ul style="list-style-type: none"> • 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. 	<ul style="list-style-type: none"> • Increases in population will drive further water demand in the Borough, thus increasing pressure on water resources. • Loss of green space could decrease water infiltration, increase surface runoff, therefore increasing flood risk.
Biodiversity	<ul style="list-style-type: none"> • 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. 	<ul style="list-style-type: none"> • The condition of SSSIs may continue to decline, and in some cases increase due to worsening air quality.

Landscape	<ul style="list-style-type: none"> • 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. 	<ul style="list-style-type: none"> • Development pressure could lead to the loss of amenity land or open space.
Waste	<ul style="list-style-type: none"> • 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. 	<ul style="list-style-type: none"> • Generation of waste is slowly expected to decrease.

2 How the Plan and its Alternatives Were Assessed

The sustainability issues and the environmental protection objectives of other plans, programmes and policies which are relevant to the draft Local Plan have been reviewed and these, along with the sustainability issues and problems identified through the baseline review have been used to develop a framework of sustainability objectives which have been used to assess the plan. The SA Framework is presented in Table NTS4.

Table NTS4: SA Framework

SA Objective	Description
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
SA3	Improve standard of health and wellbeing of those who live and work in the Borough
SA4	Improve community cohesion and reduce inequalities through the provision of community facilities to meet local cultural, educational, recreational and social needs
SA5	Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system, reducing car use for all journey lengths
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
SA9	Improve air quality
SA10	Improve water quality in rivers and groundwater and ensure the efficient use of water resources
SA11	Reduce the risk of flooding and improve resilience to climate change
SA12	Ensure the efficient use of land and buildings and protect soil quality and geological resources
SA13	Conserve and enhance biodiversity and the natural environment, improving resilience to climate change
SA14	Protect the ecological integrity of SSSI and Natura 2000 sites
SA15	Maintain and enhance the quality of the green belt and open space areas
SA16	Maintain and improve local distinctiveness
SA17	Conserve and enhance the historic built environment
SA18	Maintain and enhance the vitality and viability of the Borough's town centres
SA19	Improve the local economy by enabling employment developments in appropriate places
SA20	Maintain stable levels of employment in the Borough

3 Assessment of Alternatives and the Reasons for Choosing the Plan

3.1 Introduction

This section of the SA Report describes the SA work undertaken to date on the draft Local Plan and how it has evolved.

It summarises the findings of the appraisal work which helped inform the strategic options and spatial strategy options that have then been developed further into the draft Local Plan policies. Appendices E and F to the full SA Report provides a summary of the output of this work, which is described below.

3.2 Appraisal of the draft Local Plan 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 NTS5: Directions of Travel Options Appraised

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

The potential significant sustainability effects of each option appraised are presented in Tables 8 and 9 within the full SA Report. Full details on the assessment are contained in

Appendix F and the full report is available here <https://walthamforest.gov.uk/content/evidence-base-development-plan-documents>

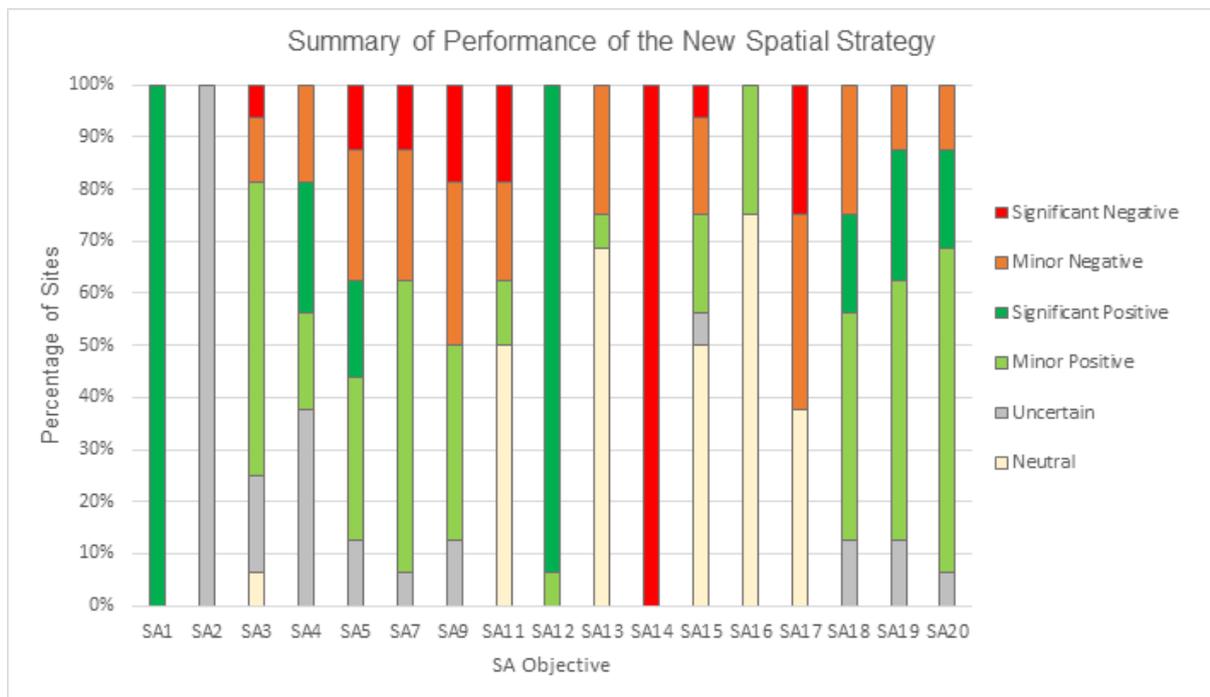
3.3 Appraisal of the draft Local Plan Spatial Strategy Options

A Growth Capacity Study was completed in June 2018 on behalf of LBWF³ 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 3.2), 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 as set out in the adopted Core Strategy. The summary of findings for the New Spatial Strategy (Figure 1) and Existing Spatial Strategy (Figure 2) are detailed below. Section 6.3 of the full SA report presents the summary findings of the assessments of the two spatial strategy options in greater detail.

New Spatial Strategy

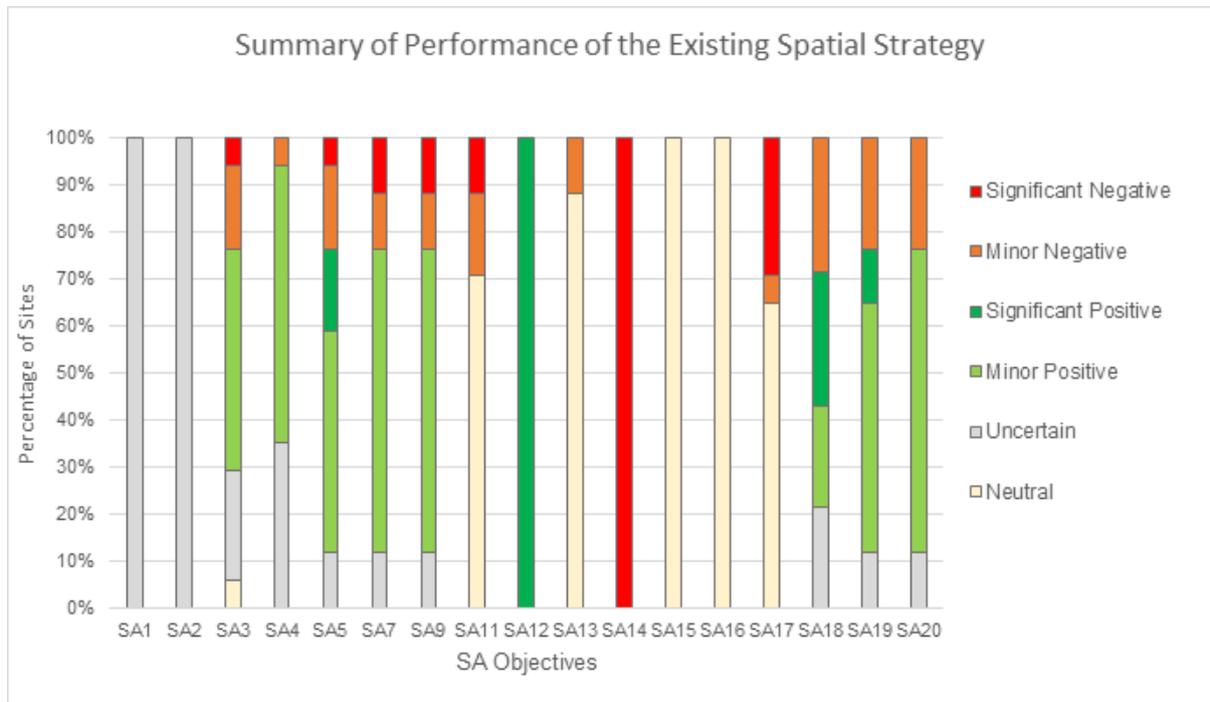
Figure 2: Summary of the Performance of the New Spatial Strategy



³ Troy Planning & Design (June 2018) London Borough of Waltham Forest Growth Capacity Study **need confirmation of ref from LBWF please can Kelvin or Charlotte provide?**

Existing Spatial Strategy

Figure 3: Summary of the Performance of the Existing Spatial Strategy



4 Sustainability Assessment of the First Draft Local Plan

4.1 Policy Assessment

Following the assessment of strategic locations, the draft Local Plan policies were assessed for their sustainability effects. The plan has generally performed very positively, and the assessment has identified that the draft Local Plan is likely to result in 201 significant positive effects across 77 policies.

A total of 9 significant negative and 15 uncertain effects were predicted for all policies. These were mostly identified for SA14 (Protect the ecological integrity of SSSI and Natura 2000 sites). 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.

A summary of significant negative and uncertain effects for all SA objectives is presented below.

Table NTS6: Summary of Potential Significant Negative and Uncertain Effects.

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 negative	SA14: The scale of development proposed by the policy has the potential for significant adverse effects on European sites.
Policy 3: Location and Management of Growth	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.

Local Plan Policy	Potential Effect	Potential Significant Effects Description
Policy 11: Whipps Cross Strategic Location	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: Central Waltham Forest	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.
Policy 17: North Waltham Forest	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 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.
Policy 18: North Chingford Strategic Location	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 21: Sewardstone Road Strategic Location	Significant negative	SA19: The 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. The strategic location is located on the boundary of the Borough, which could mean that residents will be more inclined to 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 and no provision for future employment provision is specified within the policy. The strategic location is located on the boundary of the Borough, which could mean that residents will be more inclined to seek employment opportunities in neighbouring Enfield.

Local Plan Policy	Potential Effect	Potential Significant Effects Description
Policy 22: North Circular Corridor Strategic Location	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.
Policy 23: Increasing Housing Supply	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.
	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.
Policy 30: Other forms of Housing	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	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.
Policy 42: Creative Enterprise Zone	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.
Policy 70: Deliveries Freight and Servicing	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.
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.

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 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.

4.2 Cumulative effects

Several cumulative effects were also identified as having the potential to result from a combination of two or more policies. Four cumulative effects were predicted to occur with relation to SA objectives 1, 5, 11 and 14. The cumulative effect identified for SA1 was a significant positive cumulative effect. For the SA objectives 5, 11 and 14 the effects were potentially significantly negative and these are described below:

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 at multiple locations 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. Hence, a potential significant cumulative effect has been identified for SA14.

4.3 Mitigation

The SA report has recommended mitigation measures to address potential significant negative effects and uncertainties identified and this mitigation is presented below in Table NTS7.

Table NTS7: Proposed Mitigation Measures

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.

5 Monitoring

The SEA Regulations require monitoring of the significant environmental effects of a plan. SA monitoring should cover the significant economic and social effects, as well as the environmental ones.

The following monitoring schedule (Table NTS8) sets out how the potential effects associated with each of the sustainability themes within the Local Plan could be monitored. Following a review of the Waltham Forest draft 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 NTS8: 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.

6 Next Steps

This SA Report is being published for consultation in October/November 2019 for a 6-week period.

Following consultation on the draft Local Plan and the SA report, 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 NTS9).

Table NTS9: 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 2020/21