

# London Borough of Waltham Forest Local Plan LP1 “Shaping the Borough”

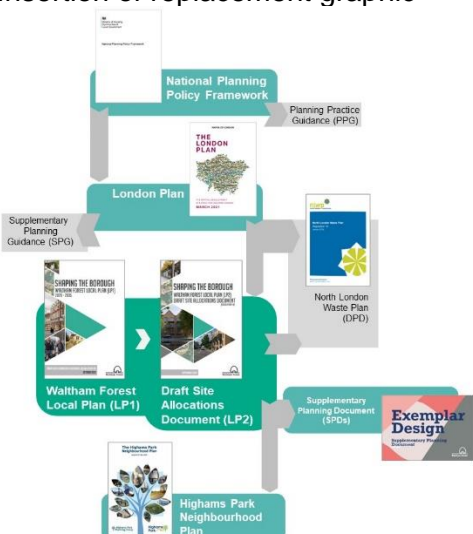
## Consolidated Schedule of additional modifications to Local Plan LP1

### Post March 2023 Hearing Sessions

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#### Chapter 1: Introduction and Background

Ref	Page	Policy / Paragraph	Modification
AM1	4	Figure 1.1	Insertion of replacement graphic 

**Chapter 2: Borough Portrait**

Ref	Page	Policy / Paragraph	Modification
AM2	5	2.1	<p>Waltham Forest is an outer borough in north east London. <del>At 3,880 hectares, it is relatively small at 3,880 ha compared to many other outer London Boroughs, but it is a very diverse borough in its make-up.</del> It stretches from the Queen Elizabeth Olympic Park in the south to the Epping Forest and Essex in the north, and is bookended by the River Lea and its associated reservoirs and marshes to the <del>West</del>west and the Epping Forest to the east. Neighbouring London boroughs are Redbridge, Newham, Enfield, Hackney, and Haringey, while on its northern edge it also abuts Epping Forest District Council and the overarching Essex County Council.</p>
AM3	5	2.2	<p>Like much of London, Waltham Forest is a collection of neighbourhoods built up around busy high streets and stations, or historic villages. <del>Town centres</del>The borough's <u>Town Centres</u> offer many diverse retail, cultural and entertainment opportunities, and boast some strong civic architecture. Walthamstow is also known for its street market, claimed to be the longest in Europe. <del>Waltham Forest became a borough in 1965 as part of the formation of the Greater London Council, bringing together the parishes of Leyton, Walthamstow and Chingford. These roughly align with the geographic areas of the borough identified in this Local Plan: South (Bakers Arms, Lea Bridge, Leyton, Leytonstone, Whipps Cross); Central (Blackhorse Lane, Forest Road Corridor, St James' Quarter, Walthamstow, Wood Street); and North (Chingford, Chingford Mount, Highams Park, North Circular Corridor, and Sewardstone oad). While South and Central areas of the borough have a dense urban character and busy street life, the borough becomes more suburban to the north with lower density housing and more open green spaces that flow into the Green Belt, Epping Forest and out to Essex.</del></p>
AM4	6	<p><b>New paragraph after 2.2</b></p>	<p><u>Waltham Forest became a borough in 1965 as part of the formation of the Greater London Council, bringing together the parishes of Leyton, Walthamstow and Chingford. These roughly align with the geographic areas of the borough identified in this Local Plan:</u></p> <ul style="list-style-type: none"> <li>• <u>South (Lea Bridge, Low Hall, Leyton, South Leytonstone, Leytonstone, Whipps Cross and Bakers Arms</u></li> <li>• <u>Central (Walthamstow Town Centre, Forest Road Corridor, Blackhorse Lane, and Wood Street); and</u></li> <li>• <u>North (North Chingford, South Chingford / Chingford Mount, Highams Park, Sewardstone Road and North Circular Corridor).</u></li> </ul> <p><u>Whilst the South and Central areas of the borough have a dense urban character and busy street life, the borough becomes more suburban to the north with lower density housing and more open green spaces that flow into the Green Belt, Epping Forest and out to Essex.</u></p>

<b>AM5</b>	<b>6</b>	<b>2.3</b>	The residential population of the borough was <del>276,983 in 2019</del> <u>278,400 in 2021,</u> <sup>(1)</sup> projected to rise to 328,082 by 2035. 54.3% aged 20-60 years old - a growth rate higher than the London average (1.7% annually compared to 1.3% ). Waltham Forest is one of the most diverse areas in the country with 48 per cent of residents from a minority ethnic background. There is an established South Asian community who have been living in the borough since before the 1960s, drawn from Pakistan, India and Bangladesh, as well as many residents from eastern Europe (Poland and Romania), Turkey, Ireland, and the Caribbean (Jamaica). The south and centre of the borough are significantly more diverse than the north: roughly half the local population are from <del>BAME ethnic minority backgrounds,</del> <u>compared to just a quarter in the north.</u>
<b>AM6</b>	<b>6</b>	<b>New paragraph after 2.3</b>	<u>There is archaeological evidence of human settlement in Waltham Forest as far back as the Bronze Age, although for most of the area's history it was primarily rural, agricultural land. The arrival of the railway during the latter half of the 19th century provoked rapid urban expansion, resulting in much of the character found today.</u>
<b>AM7</b>	<b>6</b>	<b>2.4</b>	<del>Although there has been settlement at Walthamstow since the 11th century, the area was primarily agricultural land until the arrival of the railway provoked rapid urban expansion during the latter half of the 19th century. South and central areas of the borough are characterised by Victorian and Edwardian town centres and terraced streets. These have been interrupted by interspersed with post-war social housing interventions as Walthamstow was heavily bombed estates, particularly following heavy bombing in the Second World War.</del>
<b>AM8</b>	<b>6</b>	<b>New paragraph after 2.4</b>	<u>The north of the borough was somewhat slower to develop, with activity primarily taking place during the 1910s-40s when many of its suburban semi-detached houses and terraces were built. Chingford and Highams Park have strong Edwardian Town Centres and some early examples of garden suburbs.</u>
<b>AM9</b>	<b>6</b>	<b>2.5</b>	<del>The north of the borough was developed primarily during the 1920s-30s when many of its suburban semi-detached houses and terraces were built. Chingford and Highams Park have strong Edwardian Town centres and some early 20th century examples of garden suburbs. There are more than 100 Grade II and Grade II* statutory listed buildings across the borough, including some striking examples of civic architecture such as Waltham Forest Town Hall (built in 1942) and Leytonstone Library (built in 1934). There are also more than 170 locally listed buildings, deemed to be of neighbourhood value. Key conservation areas – designated heritage assets that possess special architectural or historic interest – in the borough include: Bakers Arms, Browning Road, Chingford Green, Forest School, Leucha Road, Leyton Town Centre, Leytonstone, Lloyd Park, Orford Road, Ropers Field, Thornhill Road, Walthamstow St James, Walthamstow Village and Woodford Green – historic or architectural significance important at a local level.</del>
<b>AM10</b>	<b>6</b>	<b>New paragraph after 2.5</b>	<u>There are 15 conservation areas in the borough, designated for their special architectural or historic interest. These are: Bakers Arms, Browning Road, Chingford Green, Chingford Station Road, Forest School, Leucha Road, Leyton Town Centre, Leytonstone, Lloyd Park, Orford Road, Ropers Field, Thornhill Road, Walthamstow St James, Walthamstow Village and Woodford Green.</u>
<b>AM11</b>	<b>6</b>	<b>2.6</b>	The south and centre of the borough are connected to Central London by the Victoria and Central Lines. These have historically attracted commuters seeking to make the borough their home and more recently brought in people attracted by the expanding leisure and cultural opportunities, supporting an emerging night-time economy. Two overground rail lines serve the north <u>and east of the borough: the Liverpool Street to North Chingford line and newly electrified Gospel Oak and to Barking line.</u> The station at Lea Bridge was reopened in 2016 <u>connecting to Stratford and improvements, with further improvements planned, better connecting the borough to Stratford. Improvements to other local stations are planned, also planned, including the delivery of a new station entrance and step free access at Leyton Underground Station - significantly increasing station capacity.</u> In addition to this, the borough is seeking to deliver step-free access at all of its stations by 2040.

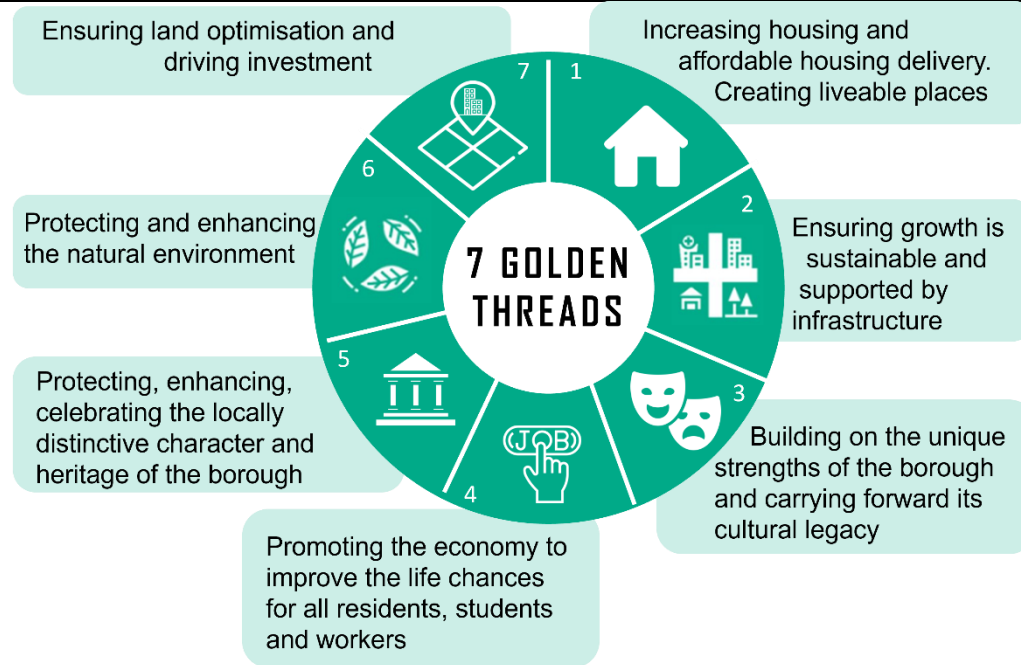
<b>AM12</b>	<b>6</b>	<b>New paragraph after 2.6</b>	<u>A large swathe of the north west of the borough remains relatively poorly served by public transport with low Public Transport Accessibility Level (PTAL) ratings. In conjunction with the Local Plan, Waltham Forest Council will be working with TfL on improving links and capacity in order to support the existing and anticipated growth in population.</u>
<b>AM13</b>	<b>7</b>	<b>2.7</b>	<del>The borough is intersected by several major road arteries, including the A406 North Circular, the A12, the A503 Forest Road and the A104 Lea Bridge Road. As well as providing good connections across London these can, however, these roads can create barriers between parts of the borough and contribute to localised poor air quality. However, a large swathe of the north west of the borough remains poorly served by public transport with low Public Transport Accessibility Level (PTAL) rating. In conjunction with the Local Plan, Waltham Forest Council will be working with TfL on improving links and capacity in order to support the existing and anticipated growth in population. The award-winning £30 million Enjoy Waltham Forest (Mini Holland) network of dedicated cycle lanes has improved connectivity between neighbourhood centres and reinforced the borough's commitment to reducing car use and promoting active travel.</del>
<b>AM14</b>	<b>7</b>	<b>New paragraph after 2.7</b>	<u>The award-winning £30 million <i>Enjoy Waltham Forest</i> (Mini Holland) network of dedicated cycle lanes has improved connectivity between neighbourhood centres and reinforced the borough's commitment to reducing car use and promoting active travel. Further improvements to pedestrian and cycle links, creating new and improved connections to employment, education and leisure opportunities across the borough will allow an even greater proportion of trips to be made by active modes of travel and further improve local air quality.</u>
<b>AM15</b>	<b>7</b>	<b>2.8</b>	<del>Waltham Forest was London's first became the Mayor of London's first-ever London Borough of Culture in 2019. Its busy programme of events left an ongoing legacy of commitment to cultural spaces and activity, as well as building strong community networks. Arts and Crafts pioneer William Morris (1834-96) is celebrated in and around Walthamstow. <u>It is home to an abundance of culture, creativity, heritage and enterprise – including the award-winning Grade II* listed William Morris Gallery was established in 2012 on the edge of Lloyd Park in the townhouse occupied by the Morris family from 1848 to 1856. A number of cinema buildings remain in some of the borough's town centres. Many of these are being rehabilitated and will support Waltham Forest's economic and cultural growth. For example, Walthamstow's EMD/Granada cinema and the Regal at Highams Park, Grade II listed Town Hall and Fellowship Square and the internationally recognised nature reserve, Walthamstow Wetlands, along with a wide range of ambitious arts, events, and experiences delivered by our thriving creative sector and communities across the borough.</u></del>
<b>AM16</b>	<b>7</b>	<b>New paragraph after 2.8</b>	<u>Culture is firmly embedded in the borough's regeneration and growth plans, including significant investment to restore the former Granada cinema to create Soho Theatre Walthamstow, a 1000 seat comedy venue, due to fully open in 2024. Levelling Up Funding has been awarded to develop Walthamstow Town Centre and the surrounding area as a cultural destination, with public realm improvements, reimagining of Vestry House Museum and enhancements to the famous mile long street market. Further north in the borough, plans are also in development to bring back to life The Regal cinema in Highams Park and make town centre upgrades in Chingford Mount.</u>
<b>AM17</b>	<b>7</b>	<b>2.9</b>	<del>As one of the five Olympic boroughs, Waltham Forest benefitted from investment linked to the 2012 London Olympic Games. It is home to the Lea Valley Ice Centre. Other key sporting presences in the community include Leyton Orient Football Club. Walthamstow's famous greyhound racing track closed in 2008 and the art deco stadium converted to housing. There are a number of local parks and allotments within the borough supporting outdoor recreation. South of <u>The recently launched 'Blackhorse Collective' Creative Enterprise Zone has brought a shared focus to the range of creative businesses and breweries in the Blackhorse Lane area, increasing their profile and generating further growth. Over the Plan Period, there will be an increased emphasis on the provision of suitable space to enable local entrepreneurs and creative organisations to remain and grow their businesses in the borough, there is access to the Olympic Park from Leyton and the Hackney Marshes football pitches for example</u></del>

			at Coronation Square in Leyton, and longer term plans for the New Spitalfields Market site, connecting with the Queen Elizabeth Olympic Park. The Council has also established a Creative Jobs Academy, working closely with local enterprises and training providers to up-skill local people, to enable them to benefit from the increased local employment opportunities in the creative sector.
AM18	7	2.10	Waltham Forest is one of London's greenest boroughs, with Metropolitan Green Belt and Metropolitan Open Space Land accounting for 27% of its area. Epping Forest is a deeply rooted part of the borough's identity, particularly in the north. The River Lea, River Ching, the William Girling and Banbury reservoirs and extensive wetlands, the extensive Walthamstow Wetlands give the borough a rich array of blue spaces. However the river and reservoirs can isolate adjacent areas and land within the valley, and will benefit from careful integration into the Local Plan's spatial strategy. Land within the Lea Valley is subject to flood risk. Many of these green and blue spaces are conservation sites and designated Sites of Special Scientific Interest supporting biodiversity within the borough. Further detail on these can be found in the accompanying Green Belt and Metropolitan Open Land Study and the Green and Blue Infrastructure Strategy. Waltham Forest Council declared a Full Climate Emergency in April 2019 and launched a Climate Action Plan in November 2022.
AM19	8	2.11	Industry and commerce in the borough are characterised by small and medium-sized enterprises (SMEs), particularly around the Walthamstow and Leytonstone areas. The largest employment sector in the borough is construction. In addition, creative and cultural businesses and food producers such as microbreweries have flourished over the past 15 years, with a high concentration in the Blackhorse Lane Creative Enterprise Zone. Although employment rates for 16-64 age groups is higher than broadly comparable with both London and national averages at 78.1%, the borough has pockets of deprivation, especially where areas are isolated due to poor transport connections

Chapter 3: Vision and Strategic Objectives			
Ref	Page	Policy / Paragraph	Modification
AM20	9	3.1	The Local Plan sets out the strategic priorities for development and sustainable growth of the borough over the next 15 years. There are <del>five</del> seven golden threads that shape the Local Plan. These are as follows, and are all considered to have equal value.

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Figure 3.1



Replacement graphic

Chapter 4: Spatial and Growth Strategy			
Ref	Page	Policy / Paragraph	Modification
AM21	16	4.5	At the heart of the National Planning Policy Framework (NPPF) is a presumption in favour of sustainable development, which underpins both plan making and decision-taking. This Local Plan acknowledges this important national policy requirement. The planning system must contribute to the achievement of sustainable development. For plan-making this means that plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change. For decision-taking this means approving development proposals that accord with an up-to-date development plans without delay; or where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless there are clear reasons as set in the NPPF for refusing development.
AM22	16	4.6	National planning policy (NPPF) mentions that local plans must meet the objectively assessed need for homes and jobs in their area. The amount of growth necessary to ensure that Waltham Forest caters for the objectively assessed needs of current and future residents and businesses up to 2035 takes into account London Plan targets and the Council's aspirations for

			<del>growth as justified through evidence base studies and regional planning policy requires Local Plans to go as far as possible in meeting identified housing need, so long as all other policy objectives are achieved.</del>
<b>AM23</b>	<b>17</b>	<b>4.7</b>	<del>The proposed increases in housing numbers, employment is supported by evidence base. Further information is provided in 'Decent Homes for Everyone' and 'Building a Resilient and Creative Economy'. With regard to retail need, the NPPF mentions that local authorities can focus on 10 years and not the whole of the development plan period. This plan makes provision for very modest increases in net additional quantitative capacity within the first 10 years (see Chapter 'Distinctive Town Centres and High Streets'). Given the nature of economic forecasts, and the current issues associated with the UK economy and retailing in particular, the forecasts become less reliable over time. Accordingly, a reduced weight has been given to forecasts to 2035.</del>
<b>AM24</b>	<b>17</b>	<b>4.8</b>	These key requirements must be planned for during the plan period and represents the most significant growth in a generation. The Council intends that the requirements for growth arising in Waltham Forest should be met within the <del>Borough</del> . <u>Policy 4 borough</u> . Policy 4 ' Location of Growth' sets out how the Council intends to sustainably deliver the growth targets set out above. Neighbourhood Plans can allocate additional growth to meet local needs at a scale which does not undermine the overall distribution strategy.
<b>AM25</b>	<b>17</b>	<b>4.9</b>	This Plan has been produced at a time of uncertainty arising from the Coronavirus pandemic. The evidence base supporting this plan was produced before the pandemic but the full effect of the pandemic is presently unknown and could take <del>some time</del> <u>some time</u> for new evidence to be become established and then modelled in future projections. In the circumstances, the Plan factors in the following assumptions: <ul style="list-style-type: none"> <li>• The trend towards rising demand for housing will continue. Such demand is from population increase and housing shortages in London generally and in the <del>Borough</del><u>borough</u> specifically;</li> <li>• A reduction in commuting patterns to workplaces outside the <del>Borough</del><u>borough</u> and the trend towards workplace mobility will reinvigorate a demand for flexible work spaces and local hubs;</li> <li>• There will be an increase in daytime working population in the <del>Borough</del><u>borough</u> arising from a reduction in commuting patterns and as more agile working strategies are adopted.</li> </ul>
<b>AM26</b>	<b>17</b>	<b>4.10</b>	In planning for the proposed level of growth, the Council recognises that long term forecasts as stated above may be susceptible to change. As projections are subject to uncertainty, forecasts may be subject to change to reflect emerging changes as and when new information becomes available. If, as a result of subsequent monitoring, growth forecasts need to be amended or policies cannot achieve the intended outcomes, this would trigger a review of this Plan. Further information on monitoring and implementation is included in <del>Chapter 'Promoting Sustainable Waste Management' and Chapter 'Delivering the Plan' of this plan.</del>
<b>AM27</b>	<b>19</b>	<b>4.14</b>	The policy draws attention to the Infrastructure Delivery Plan, providing in greater detail the anticipated infrastructure that we required during the plan period. This is a live document that will be reviewed throughout the plan period to ensure that decisions on infrastructure are made in light of up-to-date information. This provides flexibility as the role and nature of infrastructure providers will change over the period to <del>2035</del> <u>2038</u> .
<b>AM28</b>	<b>20</b>	<b>4.16</b>	The Council accepts the challenges arising from market uncertainties. Accordingly, this policy also sets out the Council's expectations where viability becomes an issue. As a general approach, developers will be expected to provide and pay for an independent assessment. Such evidence will be used to support decision making. Further information on this requirement is also included in 'Delivering the Plan' <del>(Implementation)</del> .
<b>AM29</b>	<b>21</b>	<b>4.18</b>	This policy identifies the broad geographical areas where consolidated regeneration efforts will be applied to deliver growth. These are referred to as <u>Strategic Locations</u> . In these areas, new development will be expected to provide a well balanced mix

			of economic, social and environmental benefits to support the development of a network of well-connected, sustainable, high quality, attractive, locally distinctive and healthy places. The above policy, together with other policies of this plan, steers most new development to those places that offer the best access to services and facilities <u>and public transport</u> (both now and for the foreseeable future). This can help reduce the need to travel, as well as making best use of existing infrastructure and previously developed land in built-up areas.
<b>AM30</b>	<b>21</b>	<b>4.20</b>	Site-specific proposals are set out in <del>the</del> <u>Local Plan 2 - Site Allocations-<del>DPD</del></u> . Other sites will be included in the Brownfield Land Register. Brownfield land registers provide information on sites that local authorities consider to be suitable for residential and mixed-use developments. <sup>(2)</sup>
<b>AM31</b>	<b>21</b>	<b>4.21</b>	This plan identifies 17 Strategic Locations. These are areas where substantial growth is expected to occur on larger sites or clusters of smaller sites to deliver the significant growth in housing, employment and infrastructure provision. Many of these areas encompass the designated centres of <u>Walthamstow</u> , including <u>Walthamstow Major Town Centre</u> , <u>District-CentreCentres</u> and Neighbourhood Centres and therefore represent a functional area within which a coordinated approach to redevelopment may be necessary to manage the cumulative impacts of growth in the area as whole and in the neighbouring areas
<b>AM32</b>	<b>29</b>	<b>4.44</b>	The character-led approach to intensification is supported by evidence from the Characterisation and Intensification Study (2019) <sup>(3)</sup> . This sets out in considerable detail the characteristics and design implications of each category of intensification. As guidance in interpreting the policy, a method of assessment involving 'Floor Area Ratio' (FAR) <del>will</del> <u>can</u> be applied. This compares the total floor area of a building or collection of buildings to site area. Rather than using density, this method better captures densities in mixed use developments, instead of simply residential uses as it includes all floor areas. <u>More detailed guidance on how to indentify and assess the character of an area, and the approach to character-led intensification that will be most acceptable, will be set out in the Exemplar Design Supplementary Planning Document (SPD).</u>

<b>Chapter 5: South Waltham Forest</b>			
<b>Ref</b>	<b>Page</b>	<b>Policy / Paragraph</b>	<b>Modification</b>
<b>AM33</b>	<b>31</b>	<b>5.1</b>	<del>This chapter sets out the spatial approach applicable to South Waltham Forest, incorporating the Southern Growth Zone. In this Plan, the borough is divided into three areas: South Waltham Forest, Central Waltham Forest and North Waltham Forest. Each of these parts are</del> <u>areas is made up of thriving places and diverse communities, rich in culture and heritage. The divergent character of each area presents different challenges and opportunities requiring a more locally distinctive policy response, respectful of area character. This chapter sets out the spatial and policy approach applicable to South Waltham Forest. The policies in the</u> <del>this section should be read in conjunction with other policies in the Local Plan. Plan and relevant Conservation Area Appraisals and Management Plans</del>
<b>AM34</b>	<b>31</b>	<b>5.3</b>	<del>The south</del> <u>South Waltham Forest</u> encompasses the area extending from Low Hall Sports Ground and the A104 Lea Bridge Road <del>to</del> <u>in the north to the Queen Elizabeth Olympic Park and A12 in the south, bounded by the Lee Valley Regional Park, River Lea and Epping Forest.</u> The A112 (Leyton High Road) runs north to south and broadly splits the area in half. <del>To the west of the A112 is the Southern Growth Zone, encompassing the</del> <u>are the</u> areas of Lea Bridge, Low Hall, <del>Church Road and Leyton Town Centre.</del> The east includes <u>the</u> Bakers Arms District Centre, Whipps Cross <del>and</del> <u>hospital,</u> Leytonstone Town Centre and South Leytonstone. <del>The rest of the area is supported by Neighbourhood Centres including Markhouse Corner.</del>



AM35	31	5.4	At the <del>Along its northern edge, the south area meets the central area, the civic hub of the borough. Here it</del> <u>South Waltham Forest abuts Walthamstow Wetlands and the reservoirs at Coppermill Lane. Both east and west are defined by green spaces - River Lea and Lee</u> <del>The River Lea, Lee Valley Regional Park (which is Metropolitan Open Land) and abuts the Hackney Marshes to the neighbouring borough boundary with Hackney. The east and Hackney Marshes are to the west. The eastern boundary is defined by Epping Forest and borders Wanstead Flats in the London Borough of Redbridge.</del>
AM36	31	5.5	<del>The area</del> <u>South of the Borough has two London Underground Stations, at Leyton and Leytonstone, both on the Central Line. There are also two and it has London Overground stations, at Leyton Midland Road and Leytonstone High Street – both on the Gospel Oak to Barking line. In addition, Lea Bridge Station provides Overground National Rail services to Tottenham Hale and Stratford. There are also aspirations for a further National Rail station at Ruckholt Road on the same line at Ruckholt Road.</u> <del>The area</del> <u>South Area has benefited from investment in new cycle routes together with improvements to the pedestrian environment, especially along the Lea Bridge Road, as part of Enjoy Waltham Forest (through the Transport for London "Mini Holland" programme). All of which make This makes the area highly accessible when walking and cycling.</u>
AM37	31	5.6	<del>The character of the south</del> <u>South Waltham Forest's character is predominantly Victorian with some Edwardian and post-war and modern development, and it. Its density is noticeably higher density than the north. That of the North of the Borough and there are higher levels of historic deprivation. Overall, the area is characterised by terraced streets, but also features larger developments, such as Ruckholt Road or Johnston Court in Oliver Road. Within South Waltham Forest, the Lea Bridge area is characterised by the employment land at Argall Avenue, Lammas Road and Rigg Approach, the reopened Lea Bridge Station and the new development at 97 Lea Bridge Road. Low Hall by the Depot and Church Lane by Estate Way. Whilst Leyton Mills centres on the Low Hall Depot and Low Hall Sports Ground, and Church Lane on the Estate Way Industrial Estate. The Leyton Mills Retail Park and Leyton Orient Football Club form distinctive parts of Leyton, whilst Whipps Cross is defined by the Whipps Cross hospital. Bakers Arms and Leytonstone are traditional town centres.</u>
AM38	32	<b>New Paragraph after 5.6</b>	<u>Public engagement on Area Frameworks for the Lea Bridge, Leytonstone Town Centre and South Leytonstone Strategic Locations has been carried out. Area Frameworks explore the development potential of the key and strategic sites in these locations and the wider benefits that associated investment should deliver around and between them. The outcomes of this consultation will inform Local Plan 2 - Site Allocations, and delivery plans will be produced based on the feedback provided from residents, businesses and other local stakeholders.</u>
AM39	32	5.7	<del>An additional aspect of the character of the area is that it includes some of the densest estates in the borough and high levels of historic deprivation alongside some of the Souths'</del> <u>South Waltham Forest has five Conservation Areas - Bakers Arms Town Centre, Browning Road Conservation Area and Leytonstone Conservation Area, Thornhill Road, Leytonstone, Browning Road, and Leyton Town Centre - all of which serve to increase the areas historic appeal and heritage value protect and enhance the area's historic interest and heritage significance.</u>
AM40	36	5.8	<del>The South has an of the Borough has the opportunity to deliver sustainable growth and transformative large scale regeneration, with the largest opportunity to delivery including the greatest potential to deliver new homes and jobs in the borough. This is due to its approximately proximity to Stratford City and the Queen Elizabeth Olympic Park, excellent links into central London and opportunity for redevelopment of brownfield land. The Local Plan seeks to capture the benefits arising from investment in Stratford, including the new development at the East Bank. The area has good access to high quality green spaces including Lea, including the Lee Valley Regional Park, Epping Forest, the Queen Elizabeth Olympic Park and Jubilee Park. In line with Policy 3 'location and management of growth' Policy 4 ' Location of Growth', development in the South of the Borough will be directed towards the Strategic Locations of Lea Bridge and Church Lane, Low Hall, Leyton, South Leytonstone, Leytonstone Town Centre, Whipps Cross and Bakers Arms; and identified Site Locations Opportunities within them; including the Leytonstone Tesco, Matalan and Church Lane sites. Strategic Location diagrams set out the main areas of focus within the</del>

			areas including Site Opportunity Locations, specifically Site Allocations identified in Local Plan 2. Growth and development will be directed to these Strategic Locations as they are sustainable locations for development with access to facilities including; shops, social and community infrastructure, open spaces and parks and public transport.
AM41	36	5.9	Both the <u>Waltham Forest Growth Capacity Study (2018)</u> and the GLA Strategic Housing Land Availability Assessment (SHLAA) (2017) identified the largest capacity of brownfield land in the South Waltham Forest to be in the South of the Borough. The Growth Capacity Study (2018) considers that the South Waltham Forest has the potential to deliver a minimum of 17,800 high 14,930 high-quality new homes across the South Area (see Policy 12 – Increasing Housing Supply (see Could not find ID- 6092546-1429)). The Strategic Local Plan 2 - Site Allocations DPD will set out the approach for many of these sites the sites on which these new homes will be delivered.
AM42	36	New Paragraph after 5.9	The South of the Borough also plays an important economic role and the Employment Land Study (2019) has identified the potential to deliver 3,250 new jobs over the (see Policy 24 ' Supporting Economic Growth and Jobs') .
AM43	36	5.10	The South also plays an important economic role within the borough and the Employment Land Study (2019) has identified the potential to deliver of 3,250 new jobs over the plan period (see Policy 25 – Supporting and boosting economic growth and local job creation). There is an opportunity within Leyton to deliver significant sustainable, mixed-use development around Leyton Mills and New Spitalfields. The area is called New Leyton. To support this growth sustainability in the South and at New Leyton of the Borough, the Council is considering how it can improve public transport accessibly in the area. The Council has found that there is a potential Potential for a new station has been identified at Ruckholt Road and the Council aspires to see this delivered to support new development in the area surrounding it.
AM44	36	5.11	Whipps Cross Hospital is important infrastructure asset for the borough and the wider sub region. Both Barts Trust Health NHS Trust and the Council understand that hospital needs investment and modernisation to ensure that it is fit for purpose and it can improve the care patients receive. The hospital will receive funding through the Government's £2.7 billion health and infrastructure program Health Infrastructure Plan, announced in 2019, to create a new state-of-the-art hospital
AM45	37	5.12	The South's retail South of the Borough's town centres need investment and support to compete be more. These include the designated centres of Leytonstone District Centre, Leyton District Centre and Thatched House Neighbourhood Centre. They are influenced by the role and function of Westfield Stratford and other nearby centres in proximity. They have a localised catchment which relies competitive. They have localised catchments which rely on high frequency food shopping trips and other linked trips to supporting service uses. They face greater significant challenges with on-going significant competition and the wider general pressures facing UK high streets. They need to be supported High Streets. This Plan aims to support them by promoting attractive uses and environmental improvements that will and embedding them at the heart of the approach to encourage residents to continue to spend locally to sustain their vitality and viability.
AM46	37	5.13	Development around transport nodes/hubshubs and nodes is supported in both the NPPF (2021) and the London Plan. These (2021) as they are considered to be more sustainable locations for new homes. The Council has aspirations to deliver In line with this approach, this Plan supports the delivery of new homes and an improved station entrance at to Lea Bridge Station Sites Site Opportunity Location in at in the Lea Bridge and Church Lane Strategic Location.
AM47	37	5.14	The South of the Borough is home to some of the borough's waste sites, as identified in the North London Waste Plan. Any proposals coming forward on these sites will be expected to adhere to policies set out in the adopted North London Waste Plan and Policy 95 – Waste Management and any proposals coming forward in the area industrial land (2022) and Policy 93 'Waste Management' of this Plan

<b>AM48</b>	<b>37</b>	<b>5.15</b>	The South of the Borough is home to important sporting and cultural venues. These include the <u>Lee Valley Ice Centre, the Lee Valley Riding Centre and Waterworks</u> the Lee Valley Waterworks Centre, Nature Reserve & Middlesex Filter Beds in Lea Bridge and Church Road Strategic Location; Leyton Orient, Ive Farm and the Hockey Football Club, "Feel Good Too" (formerly Ive Farm Fields) and the Lee Valley Hockey and Tennis Centre in Leyton; and the Heart of Leyton (Leyton Cricket Hub) in Bakers Arms and Leyton Green Leyton County Cricket Ground. There are opportunities to add to these facilities, including supporting the night-time economy (see <del>Policy 46 – Evening and Night-time Economy Uses</del> Policy_44 'Evening and Night-time Economy Uses') and these will be supported, in Strategic Locations and Town Centres (in accordance with <del>Policy 39 – Hierarchy of Centres</del> Policy 38 'Hierarchy of Centres'), and the borough's cultural and sporting needs (see <del>Policy 36 – Promoting Culture and Creativity</del> Policy 35 'Promoting Culture and Creativity').
<b>AM49</b>	<b>37</b>	<b>5.16</b>	The Council is committed to ensuring everyone feels safe within the borough. Lea Bridge and Bakers Arms have been identified as areas that require specific focus on <del>designing out crime</del> <u>Designing Out Crime and Secured by Design</u> measures. Developments which <del>seeks</del> seek to address this will be supported where they are in accordance with <del>Policy 60 – Design Out Crime</del> Policy 58 'Making Places Safer and Designing Out Crime'
<b>AM50</b>	<b>38</b>	<b>5.17</b>	The South <u>Waltham Forest</u> is home to some important heritage assets. This includes <del>three</del> five of the borough's conservation areas: Bakers Arms, <del>Bushwood</del> Thornhill Road, Leytonstone, Browning Road and Leyton Town Centre <del>and development.</del> <u>Development</u> which protects and enhances these areas, in line with <del>Policy 74 – Conservation Areas</del> Policy_72 'Conservation Areas', will be supported.
<b>AM51</b>	<b>38</b>	<b>5.18</b>	Encouraging walking and cycling is <del>important</del> a key priority for this Local Plan, the <del>Mayors</del> Mayor's Transport Strategy and the London Plan, <del>Public (2021)</del> . An interconnected green and blue infrastructure network, with public realm routes to key designations, facilities or amenities across the <del>Strategic Locations in the South have been identified on maps.</del> Other public realm routes <del>may</del> South of the Borough will be identified through <del>other</del> supporting planning policy documents and guidance as set out in <del>Policy 4 – Location of Growth</del> Policy 4 'Location of Growth' and <del>Policy 5 – Management of Growth</del> Policy 5 'Management of Growth', including the Green and Blue Spaces Supplementary Planning Document.
<b>AM52</b>	<b>38</b>	<b>5.19</b>	The tools set out in <del>Policies 4 and 5 Location of Growth and Management of Growth</del> include: <u>The implementation tools set out in Policy 4 'Location of Growth' and Policy 5 'Management of Growth' include:</u> <ul style="list-style-type: none"> <li>• <u>The Brownfield Land Register;</u></li> <li>• <u>Masterplan SPDs</u><u>Area-Based Supplementary Planning Documents and Masterplans; and</u></li> <li>• <u>Planning Briefs</u></li> </ul>
<b>AM53</b>	<b>38</b>	<b>5.20</b>	<u>These documents will provide more detail guidance to developers on the area. Furthermore,</u> <del>the Strategic Local Plan 2 -Site Allocations</del> <u>DPD</u> will set out site specific requirements for strategic and <del>critical</del> key sites across the South. <del>Neighbourhood Plans may come forward within Strategic Locations and the</del> of the Borough. The Council will work collaboratively with designated Neighbourhood Forums <u>to assist with their preparation of any Neighbourhood Plans that come forward.</u>
<b>AM54</b>	<b>38</b>	<b>5.21</b>	In order to deliver this policy, the Council will proactively engage with Duty to Cooperate partners and other stakeholders, including <u>neighbouring boroughs,</u> infrastructure and utility providers, developers, housing associations, <del>and</del> private landowners, and interested community groups, <del>to remove barriers to delivery.</del>

AM55	38	5.22	The policy <u>in this chapter</u> sets out where investment is required across the South <u>of the Borough</u> and is supported by <del>Waltham Forest's</del> <u>the Council's</u> inward investment work.
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Chapter 6: Central Waltham Forest			
Ref	Page	Policy / Paragraph	Modification
AM56	39	New Paragraph	<u>In this Plan, the borough is divided into three areas: South Waltham Forest, Central Waltham Forest and North Waltham Forest. Each of these areas is made up of thriving places and diverse communities, rich in culture and heritage. The divergent character of each area presents different challenges and opportunities requiring a more locally distinctive policy response, respectful of area character. This chapter sets out the spatial and policy approach applicable to Central Waltham Forest. The policies in this section should be read in conjunction with other policies in the Plan and relevant Conservation Area Appraisals and Management Plans.</u>
AM57	39	6.1	<del>This chapter sets out the spatial approach for Central Waltham Forest. The Central area</del> <u>The Central Area</u> provides the civic, economic and retail focus of the borough. It is home to many of Waltham Forest's cultural and creative industries and visitor attractions. The area's potential for good, <u>inclusive growth</u> is recognised by the Mayor of London <del>and in the London Plan,</del> with the <u>Upper-Lee Valley</u> designated as an Opportunity Area <del>at a sub-regional level; including in the London Plan (2021)</del> <u>and specific opportunities for growth identified at Walthamstow and Blackhorse Lane. The London Plan area is also located within the UK Innovation Corridor. The London Plan (2021) also designates Walthamstow and Wood Street as Strategic Areas for Regeneration. Walthamstow is designated as a Major Centre, with its evening economy being identified of regional</u> <del>night-time economy identified as being of regional or sub-regional importance.</del>
AM58	39	6.2	Central Waltham Forest encompasses the area extending south from <u>the A406 North Circular in the north</u> to Low Hall Sports Ground and the A104 Lea Bridge Road in the south. It is <del>bounded</del> <u>bound</u> by Walthamstow Wetlands and the London Borough of Haringey in the west. <del>The</del> <u>and the Epping Forest-SAC (Special Area of Conservation (SAC) and the London Borough of Redbridge lie</u> to the east. The A112 <u>(Chingford Road and Hoe Street)</u> runs north to south <del>and,</del> broadly splitting the area in half, <del>with the A503 splitting the borough</del> <u>and the A503 (Forest Road) runs across it from east to west.</u>
AM59	39	6.3	<del>The area</del> <u>Central Area</u> has two London Underground Stations, Walthamstow Central and Blackhorse Road, both on the Victoria Line. There are <del>also five</del> <u>five</u> London Overground services from <u>five stations</u> - Wood Street, Walthamstow Central Transport Interchange and St James Street on the Chingford to Liverpool Street line; <del>and Queens Road and Blackhorse Road on the Gospel Oak to Barking line. Walthamstow Central Transport Interchange also has a bus station serving North East London, which is a key bus network for the borough and North East London. St James Street Station also has a bus terminus. The area has benefited from investment in new walking and cycle routes, together with improvements to the pedestrian environment as part of Enjoy Waltham Forest (through Transport for London's "Mini-Holland" programme), all of which make the area highly accessible by sustainable modes of travel.</del>
AM60	39	6.4	The character of Central Waltham Forest is predominantly <u>defined by</u> Victorian and Edwardian terraces with some interwar and modern development, <del>The density of the area is noticeably higher than the northern part of the borough. Traditional forms of development along the terraced streets include the Warner Estates to the west of Lloyd Park. The density of the area is noticeably higher than that of North Waltham Forest.</del>

<b>AM61</b>	<b>39</b>	<b>6.5</b>	Walthamstow Central Transport Interchange is the transport focus for <del>the town centre</del> <u>Walthamstow Town Centre</u> , with retail concentrated around the Town Square and the main shopping centre of the The Mall situated between Selbourne Road and the High Street. Walthamstow Market is a key retail asset for Walthamstow Town Centre. At one kilometre long, the street market is <del>recorded</del> <u>often described</u> as the longest street market in Europe, having an extensive 180-year history and strong local support.
<b>AM62</b>	<b>40</b>	<b>6.6</b>	Hoe Street contains an eclectic mix of independent retailers and is home to the Grade II* listed <del>cinema of Victoria Halls (formerly the EMD and Granada Cinema's, which are</del> <u>former EMD Cinema, which is</u> currently subject to major investment by the Council to restore the listed auditorium to a <del>4,000</del> <u>1000</u> seat performance venue). <del>The centre piece of the area, and will become known as Soho Theatre, Walthamstow. Central to Walthamstow is The Scene; - an award-winning development with residential units</del> <u>homes, a cinema, and restaurants, and Central Parade; - a recently</u> Grade II listed building, which combines residential <del>units</del> <u>homes</u> with a mixed-use creative hub, co-working studio, exhibition and retail space.
<b>AM63</b>	<b>40</b>	<b>6.7</b>	<del>The Forest Road Corridor connects the Epping Forest at the Water Works at its Eastern</del> <u>its eastern</u> end with Walthamstow Wetlands at its western end. <del>Opening up the</del> <u>The</u> Town Hall Campus, with its Grade II* listed buildings and grounds, <del>for commercial and residential use alongside the civic function is being developed with commercial, cultural and residential uses alongside its civic function, to create a new area which will become</del> <u>place</u> known as 'Fellowship Square' and will provide. <del>This is providing a stimulus for further regeneration along this corridor. Also located on the Forest Road Corridor is the historic William Morris Gallery, Lloyd Park and Bell Corner.</del> <u>the corridor.</u>
<b>AM64</b>	<b>40</b>	<b>New paragraph after 6.7</b>	<u>Also located on Forest Road is the historic William Morris Gallery, Lloyd Park and Bell Corner.</u>
<b>AM65</b>	<b>40</b>	<b>6.8</b>	<del>The</del> <u>This Plan designates part of the</u> Blackhorse Lane area <del>is designated as a Creative Enterprise Zone (CEZ) in line with the London Plan policy; HC5 (see Policy_37 'Blackhorse Lane Creative Enterprise Zone (CEZ)'). This designation builds on Blackhorse Lane's rich history of manufacturing items such as textiles, glass, paint, aircraft engines and shop mannequins. The area is centred around developments which has excellent access to the Walthamstow Wetlands and the borough's main cultural attractions and is well served by Blackhorse Road Station. Within the Creative Enterprise Zone, development should provide flexible and creative spaces providing</del> <u>workspaces which provide</u> attractive and affordable office, <del>commercial and studio options for start-up and incubator businesses. Within the Creative Enterprise Zone, the Council supports alongside other uses. The Council will also support 'meanwhile' uses on a temporary basis for</del> <u>that allow</u> businesses to contribute to the variety and vibrancy of the area. <del>The area has excellent access to the Walthamstow Wetlands and the borough's main cultural attractions. Blackhorse Road Station Transport Hub is adjacent to Blackhorse Lane and provides opportunities for improving walking and cycling accessibility.</del>
<b>AM66</b>	<b>40</b>	<b>6.9</b>	Wood Street connects the Forest Road Corridor to <del>The</del> <u>Epping Forest at Hollow Ponds,</u> opposite Whipps Cross. This area has been subject to significant investment and regeneration in recent years to improve the experience for residents and visitors, including the housing estate regeneration of <del>Marlowe Road into future development at</del> <u>Marlowe Road and the delivery of the new Wood Street Library.</u> Wood Street is an attractive shopping destination with boutique independent shops, cafés, restaurants and bars. <del>In addition to this, the area is home to the</del> <u>and the</u> famous Wood Street Indoor Market, which provides space for small independent and niche retailers.

<b>AM67</b>	<b>40</b>	<b>6.10</b>	<del>The Walthamstow Village and Orford Road area is the historic, surviving village nucleus, centred on the ancient parish church and churchyard of St Mary's which is designated as a conservation area. Walthamstow Village is a. These areas have vibrant and diverse community which supports communities which support the growth of the borough's evening economy. It is also a culturally rich area, with the Vestry House museum presenting the expansive history of the Borough. Between Walthamstow Village and Wood Street is the Ravenswood Industrial Estate, which, whilst retaining much of its character, supports local employment opportunities and facilitates economic growth.</del>
<b>AM68</b>	<b>41</b>	<b>6.11</b>	The Higham Hill neighbourhood is situated to the North-West of the Central Area. It is predominately residential in character, but provides local retail and employment opportunities as well as access to key community services such as schools, a health centre and the local library.
<b>AM69</b>	<b>44</b>	<b>6.12</b>	<del>The identification of Walthamstow Town Centre as the Borough's major centre and principle economic hub (Policy 39 Hierarchy of Centres see Policy 38 'Hierarchy of Centres'), justifies the Council's decision to focus major investment in this area to promote sustainable economic growth in the business, retail, leisure, tourist and cultural sectors and to drive the borough's growing evening and night time economy (Policy 46 Evening and Night-time Economy Uses see Policy 44 'Evening and Night-time Economy Uses').</del>
<b>AM70</b>	<b>44</b>	<b>6.13</b>	<del>By supporting enhancements at the key gateway junctions of Hoe Street, Forest Road and Blackhorse Lane in the central area help to bolster the sense of arrival at these unique and distinctive parts of the Central Area. The enhancement of these junctions supports place-shaping at the nodes of Walthamstow Town Centre, the Town Hall campus and the Blackhorse Lane Area.</del>
<b>AM71</b>	<b>44</b>	<b>6.14</b>	<del>Due to the diverse nature of the Central Area, the Council is As set out in also committed to supporting Policy 10 'Central Waltham Forest' this Plan also supports inclusive growth outside Walthamstow Town Centre, in other parts of the Central Area such as, including Wood Street, Forest Road, Blackhorse Lane and which will complement Walthamstow Town Centre with their distinct characters. Blackhorse Lane being the Borough's Creative Enterprise Zone provides space for (Central Waltham Forest Policy clause D) the growing number of small independent creative sector businesses to locate and grow and Blackhorse Lane.</del>
<b>AM72</b>	<b>44</b>	<b>6.15</b>	The Council's plan for the Town Hall Campus sensitively restores the grade II listed Town Hall building and re-imagines the site as a mixed-use site with new homes, workspace and commercial outlets within a multi-purpose community asset that will become known as 'Fellowship Square' and be open to the community as a whole.
<b>AM73</b>	<b>44</b>	<b>6.16</b>	<del>Working in collaboration with Transport for London, the Council is committed to supporting the enhancement of Walthamstow Central Transport Interchange (including but not exclusively the Bus Station), and its establishment as one of outer-north North East London's key transport Interchanges, as this. This will brings greater potential for growth in the borough and also facilitates a greater share for facilitate increased use of more sustainable transport modes and reduced car dependency (Policy 62 Promoting Sustainable Transport see Policy 60 'Promoting Sustainable Transport', Policy 63 Active Travel, Policy 61 'Active Travel' and; Policy 64 Public Transport, Policy 62 'Public Transport'). In recognition of the essential service that they provide and the benefit that they bring to their respective district and neighbourhood centres, the Council will also support the enhancement of Wood Street Overground Station, St James Street Overground Station, Walthamstow Queens Road Overground Station and Blackhorse Road Station.</del>
<b>AM74</b>	<b>45</b>	<b>6.17</b>	Walthamstow's Historic Street Market is often recorded as the longest street market in Europe. It has an extensive 180-year history and is a local institution. The markets' market's primary function is as a key retail asset for the Borough borough.

			Supporting improvements in terms of its appearance, function and circulation will ensure that its strong local support continues against the <del>strong</del> competition from online and chain retailers.
<b>AM75</b>	<b>45</b>	<b>6.18</b>	<p>The Council recognises the importance of protecting its historic assets <u>and the unique character of each of its neighbourhoods</u>. The <del>St James's Area</del> James Street area, for example (including the St James Conservation Area) combines a mixture of retail, <del>cafés</del> office and residential uses, <del>much of which was constructed by the Warner family in the late nineteenth and early twentieth century and combined.</del> <u>Combined with the curving form of the street, the impressive architecture contributes to the a special sense of character. It is these inherent qualities that justify why the Council seeks to preserve and enhance the area.</u> In 2017 the conservation area was subject to a major investment to improve shopfronts and public realm to keep it looking its best for future generations to enjoy. <u>In recent years the area has been transformed. For example, in 2017 a major Heritage Lottery Fund investment improved 50 shopfronts and the public realm. Public art was funded through the St James Big Local programme and the 'Crate' meanwhile space on a formerly vacant car park site was delivered. Over the coming years, the St James Quarter will continue to transform, with new, high quality homes and the new NHS Health Centre. The Council will also continue work with key stakeholders, including Transport for London and Network Rail, to continue to improve station access, wayfinding, lighting and opportunities for opening railway arches for commercial uses and to bring them back into public use.</u></p>
<b>AM76</b>	<b>45</b>	<b>6.19</b>	<p>The Council will be supportive of proposals <del>of new tourist attractions and related developments in the Central Area that build</del> <u>which deliver new cultural and creative destinations and development which builds on the legacy of Waltham Forest being London's first "Borough of Culture" in 2019. The continual promotion of the' (2019) and the Council's own investment in cultural assets such as Soho Theatre Walthamstow, Hatherley Mews, Vestry House Museum and Chestnuts House as a creative enterprise hub, with Levelling Up Fund investment during 2023-2025. The continued promotion of cultural and creative attractions</u> <del>destinations will increase dwell times of visitors and tourists to the borough, which supports the growing visitor economy of the vibrant metropolitan town centres and high streets and encourages a thriving evening and night-time economy</del> <u>visitor and tourist footfall and dwell time in Walthamstow Town Centre, and support the growing leisure, hospitality and evening economy, generating local investment, training and employment opportunities.</u></p>
<b>AM77</b>	<b>45</b>	<b>New Paragraph after 6.19</b>	<p><u>Implementation</u></p> <p><u>The implementation tools set out in Policy 4 'Location of Growth' and Policy 5 'Management of Growth' include:</u></p> <ul style="list-style-type: none"> <li>• <u>The Brownfield Land Register</u></li> <li>• <u>Area-Based Supplementary Planning Documents and Masterplans; and</u></li> <li>• <u>Planning Briefs</u></li> </ul> <p><u>These documents will provide more detail guidance to developers on the area. Furthermore, Local Plan 2 - Site Allocations will set out site specific requirements for strategic and key sites across Central Waltham Forest. The Council will work collaboratively with designated Neighbourhood Forums to assist with their preparation of any Neighbourhood Plans that come forward.</u></p>

In order to deliver this policy, the Council will proactively engage with Duty to Cooperate partners and other stakeholders, including neighbouring boroughs, infrastructure and utility providers, developers, housing associations, private landowners and interested community groups.

The policy in this chapter sets out where investment is required across Central Waltham Forest and is supported by the Council's inward investment work.

**Chapter 7: North Waltham Forest**

Ref	Page	Policy / Paragraph	Modification
AM78	46	7.1	<del>This chapter sets out the spatial approach for North Waltham Forest, which principally covers Chingford, Chingford Mount and Highams Park. In this Plan, the borough is divided into three areas: South Waltham Forest, Central Waltham Forest and North Waltham Forest. Each of these areas is made up of thriving places and diverse communities, rich in culture and heritage. The divergent character of each area presents different challenges and opportunities requiring a more locally distinctive policy response, respectful of area character. This chapter sets out the spatial and policy approach applicable to North Waltham Forest. The policies in this section should be read in conjunction with other policies in the Local Plan, the Highams Park Neighbourhood Plan and North Chingford Conservation Area Appraisal relevant Conservation Area Appraisals and Management Plans.</del>
AM79	46	7.2	<del>The north of Waltham Forest encompasses the area extending northwards from the A406 North Circular to Epping Forest. The North Circular runs east to west through the borough, broadly splitting it in half, making the north of Waltham Forest North Waltham Forest is the largest of the borough's three sub areas, stretching up from the Banbury Reservoir and the south side of the North Circular as far as the boundaries with Epping Forest District Council to the North north. To the south of the North Circular, the area connects to the most significant area of growth in the borough, moving along the Lea Valley from Blackhorse Lane towards Leyton and Stratford. The west via the Lee Valley, the North Area is connected to significant growth areas at Blackhorse Lane and Leyton, and then onto Stratford. To the west, the area is defined by the River Lee Lea and Lee Valley Regional Park (which is Metropolitan Open Land), with the London Borough of Enfield lying further beyond the William Girling and George V reservoirs. To the east is the boundary with the London Borough of Redbridge.</del>
AM80	46	7.3	<del>Overall, the</del> <u>The character of the north North of the Borough is generally suburban. As such the area is lower in density compared to, it is generally of a lower density than the Central and South areas of the borough. The area</u> <u>Areas. North Waltham Forest is characterised by semi-detached houses and terraces interspersed with some larger detached properties. These are generally a mix of inter-war, Victorian and Edwardian homes often on larger plots which feature front and rear gardens. The area includes the borough's first Neighbourhood Plan area in Highams Park.</u>
AM81	46	7.4	<del>The regeneration potential of the area is recognised in the London Plan (2021). The Upper Lee Valley is designated as an Opportunity Area at sub-regional level and Highams Park is designated as a Strategic Area for Regeneration. In addition,</del>

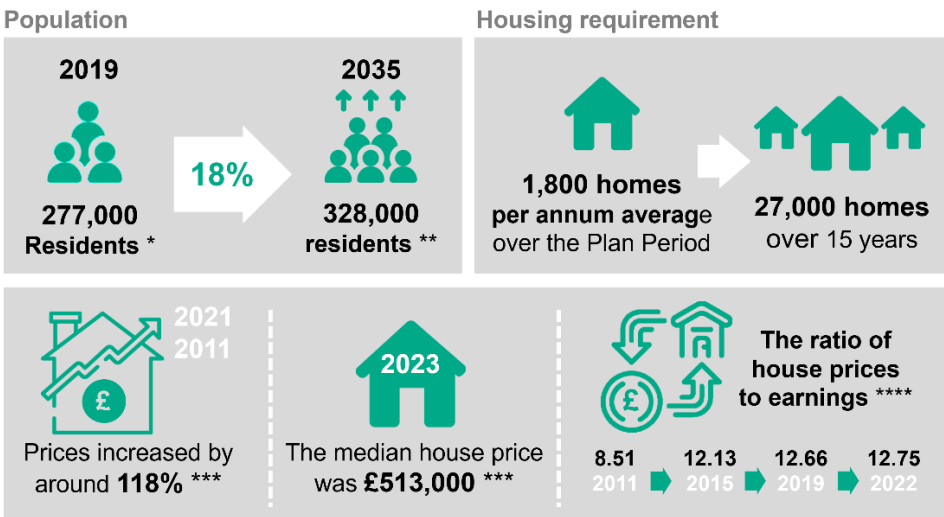


			<del>the area includes the borough's first neighbourhood plan area in Highams Park. Beyond London, at a wider regional level, the North of the borough is</del> <u>The area is also located within the UK Innovation Corridor.</u>
<b>AM82</b>	<b>46</b>	<b>7.5</b>	<del>The North of the borough has great opportunities for housing, employment and cultural growth. It is a mixed area of relatively low-density residential housing, employment land, and retail. The Epping Forest and the borough's fringe of Green Belt are major green assets which give this part of the borough an exceptional character. In the context of future development in the south of the borough</del> <u>Central and South Waltham Forest, and planned schemes emerging in adjacent boroughs, the area offers opportunities to improve linkages within the borough and with, to neighbouring areas and beyond.</u>
<b>AM83</b>	<b>50</b>	<b>7.6</b>	<del>The North of the Borough presents a significant but different transformational opportunity for good growth and regeneration in Waltham Forest and London as it sits between the suburbs and the forest. Development must support the need to deliver a minimum of 3,600 new quality homes. Employment land in the area will be expected to be intensified, with co-location a consideration to ensure the delivery of at least 1,950 additional jobs, and a mixed and resilient economy. that is different from the other two sub areas given its position between the suburbs and the forest.</del>
<b>AM84</b>	<b>50</b>	<b>7.7</b>	<del>New, high-quality homes will be expected to be provided delivered in parallel with new employment opportunities, in livable and mixed-use neighbourhoods providing enhancing the area's vibrancy and diversity. Community workspace/ commercial Retail, uses, workspace, retail, leisure, cultural and a suitable evening and night-time offer will be directed to designated district centres. Neighbourhood centres and local centres will provide retail and services.</del>
<b>AM85</b>	<b>51</b>	<b>7.8</b>	<del>The delivery of transformational regeneration and good growth should be based on place-making principles using the that respond to the unique character, heritage and culture of the area. The district centre in North Chingford provides the principal location for retail and community cultural activity in the local area each area. Development should protect and enhance the Chingford Green, Chingford Station Road, Ropers Field and Woodford Green Conservation Areas. Investment to regenerate retail in the area should contribute to the improvement of the Chingford Green conservation area and should be aimed at maintaining and improving the vitality and viability of the North Chingford District Centre</del> <u>district centres and neighborhood centres to encourage residents to continue to spend locally to sustain their long term prospects.</u>
<b>AM86</b>	<b>51</b>	<b>7.9</b>	<del>The South Chingford/Chingford Mount District centre provides the principal location for retail and community cultural activity in the local area. Investment to regenerate cultural and community uses</del> <u>Public engagement on an Area Framework for the Chingford Mount Strategic Location has been carried out. The Area Framework explores the development potential of the key and strategic sites in the area will contribute to maintaining and improving the vitality and viability of the district centre and the wider benefits that associated investment should deliver around and between them. The outcomes of this consultation will inform Local Plan 2 - Site Allocations, and a delivery plan will be produced based on the feedback provided from residents, businesses and other local stakeholders.</u>
<b>AM87</b>	<b>51</b>	<b>7.10</b>	<del>The Highams Park District Centre provides the principal location for retail, and community cultural activity in the local area. Investment to regenerate cultural and community uses in the area will contribute to maintaining and improving the vitality and viability of the district centre to encourage residents to spend locally to sustain their long term prospects whilst retaining the intrinsic character of the area as detailed in the Highams Park Neighbourhood Plan</del> <u>intrinsic character of the Highams Park area should be preserved and enhanced as detailed in the Highams Park Neighbourhood Plan. Improvement to Highams Park Overground Station entrance will be supported, to create an accessible public space, with opportunity for small retail units, events and markets in collaboration with the Highams Park Planning Group, local</u>

			<u>businesses and residents, and building on the initial study and engagement carried out through the GLA's High Streets for All programme in 2022.</u>
<b>AM88</b>	<b>51</b>	<b>7.11</b>	<u>Growth in the neighbouring borough London Borough of Enfield, together with the planned Crossrail 2 potential delivery of Crossrail 2 in the future, provide important opportunities to regenerate the Sewardstone Road neighbourhood centre to provide North Circular Corridor and Sewardstone Road Strategic Locations to provide industrial intensification and new housing and to contribute to its the improved vitality and viability of the Sewardstone Road Neighbourhood Centre. In addition, regeneration in this location these locations will provide greater connectivity for new residents to locations in both inside and outside of the borough by encouraging walking and cycling. This is an important Encouraging walking and cycling is a key priority for this Local Plan, the Mayor's Mayor's Transport Strategy and the London Plan - Public (2021). An interconnected green and blue infrastructure network, with public realm routes to key designations, facilities or amenities across the Strategic Locations in the North have been identified on maps. Other public realm routes may North of the Borough will be identified through other supporting planning policy documents and guidance as set out in Policy 3 Location Policy 4 ' Location of Growth' and Management of Growth {Policy 5 Management of Growth} including the Green and Blue Spaces Supplementary Planning Document.</u>
<b>AM89</b>	<b>51</b>	<b>7.12</b>	<u>In addition the planned development at Meridian Water in Enfield provides important opportunities to free up neglected open space on the Green Belt fringe of the A406 North Circular Road to provide leisure and biodiversity benefits to the occupiers of new development and to provide suitable alternative natural green space (SANGS) to mitigate the impact Suitable Alternative Natural Greenspace (SANG) to avoid harmful recreational impacts of development on the Epping Forest SAC (Policy 83 Special Area of Conservation (see Policy 81 'The Epping Forest and the Epping Forest Special Area of Conservation'). Growth in this area will enhance the character of the neglected urban fringe and contribute to the wider regeneration objectives set out in Policy 4 Location of Growth and Policy 5 Management of Growth.</u>
<b>AM90</b>	<b>52</b>	<b>7.13</b>	<u>The implementation tools set out in Policy 4 ' Location of Growth' and Policy 5 'Management of Growth' include:</u> <ul style="list-style-type: none"> <li>• <u>The Brownfield Land Register</u></li> <li>• <u>Masterplan SPDs Area-Based Supplementary Planning Documents and Masterplans; and</u></li> <li>• <u>Planning Briefs</u></li> </ul>
<b>AM91</b>	<b>52</b>	<b>7.14</b>	<u>These documents will provide more detail guidance to developers on the area. Furthermore, the Strategic Local Plan 2 - Site Allocations DPD will set out site specific requirements for strategic and critical key sites across the North of the borough. In addition to the existing Neighbourhood plan in Highams Park, Neighbourhood Plans may come forward within Strategic Locations and the Council will work collaboratively with The Council will continue to work collaboratively with the Highams Park Neighbourhood Plan Group, and support any other designated Neighbourhood Forums to prepare any other Neighbourhood Plans that come forward.</u>
<b>AM92</b>	<b>52</b>	<b>7.15</b>	<u>In order to deliver this policy, the Council will proactively engage with Duty to Cooperate partners and other stakeholders, including neighbouring boroughs, infrastructure and utility providers, developers, housing associations, private landowners, and interested community groups, to remove barriers to delivery.</u>
<b>AM93</b>	<b>52</b>	<b>7.16</b>	<u>The policy in this chapter sets out where investment is required across the North of the Borough and is supported by Waltham Forest's the Council's inward investment work.</u>

**Chapter 8: Decent Homes for Everyone**

Ref	Page	Policy / Paragraph	Modification
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AM94	54	Figure 8.2	<p>Updated figure.</p>  <p><b>Population</b></p> <p>2019: 277,000 Residents *          2035: 328,000 residents ** (18% increase)</p> <p><b>Housing requirement</b></p> <p>1,800 homes per annum average over the Plan Period          27,000 homes over 15 years</p> <p><b>House prices</b></p> <p>Prices increased by around 118% *** (2011 to 2021)</p> <p>The median house price was £513,000 *** (2023)</p> <p>The ratio of house prices to earnings ****: 8.51 (2011), 12.13 (2015), 12.66 (2019), 12.75 (2022)</p> <p>* Mid Year Estimate (ONS, June 2020)          ** BPO, Medium Scenario (GLA, 2018) &amp; Housing Trajectory (LBWF)          *** Land Registry House Price Statistics          **** Median house price to median residence-based earnings ratio (ONS)</p>
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AM95	55	8.4	<p>The GLA Strategic Housing Land Availability Assessment (SHLAA) and Waltham Forest's Growth Capacity Study 2018 show the borough has enough capacity to deliver new homes. These assessments demonstrate that Strategic Locations across the borough have significant capacity for new homes by making effective use of land, intensification and increased density. Such opportunities will be explored through Area Supplementary Planning Documents (SPD), Masterplans and Planning Briefs, as set out in 'Waltham Forest's Spatial and Growth Strategy'. <del>In addition to this, new homes will be directed to around transport hubs and accessible locations across the borough.</del> Sites across the borough suitable for new homes will be listed on Waltham Forest's Brownfield Land Register. The Brownfield Land Register will enable Waltham Forest to have up to date and consistent information on sites for new homes, maintained in a transparent way through publishing as open data.</p>
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AM96	56	8.9	<p>Genuinely affordable housing is homes which meet the needs of households whose incomes are not sufficient to enable them to buy or rent housing on the open market. Waltham Forest has a high level of affordable housing need. The Strategic Housing Market Assessment (SHMA) has estimated that the need for the borough is 71%. Given the significant level of need and the difficulties local residents have in accessing the housing market, Waltham Forest seeks to prioritise the delivery of affordable housing and has set a strategic affordable housing target of 50% across the plan period, the approach to this is set out in Policy 13 'Delivering Genuinely Affordable Housing'.</p>
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<b>AM97</b>	<b>58</b>	<b>8.13</b>	The percentage of affordable housing on a scheme is to be measured in both habitable rooms and <del>units</del> homes, with the habitable room measurement to be used with reference to Part C of Policy 13 'Delivering Genuinely Affordable Housing'_to determine whether the threshold has been met.
<b>AM98</b>	<b>58</b>	<b>8.14</b>	Affordable housing will be first sought on-site and opportunities to deliver this will be maximised. However, in exceptional circumstances which can be demonstrated, affordable housing may be allowed to be delivered off site on another site, or a donor site, where this is not possible, a payment in lieu may be acceptable. <u>Further detail on these circumstances and calculations will be provided in and update to the Affordable Housing and Viability Supplementary Planning Document (SPD).</u>
<b>AM99</b>	<b>58</b>	<b>8.15</b>	Affordable housing contributions will be sought on alternative housing products such as Build to Rent, Purpose Built Shared Housing, Purpose Built Student Housing in line with the <del>Intend to Publish</del> London Plan (2021).
<b>AM100</b>	<b>59</b>	<b>8.17</b>	<del>The Intend to Publish</del> London Plan (2021) Policy H6 'Affordable Housing Tenure' <u>housing tenure</u> states that residential development should apply a split of: <ul style="list-style-type: none"> <li>• a minimum 30% low cost rented homes ;</li> <li>• <u>and a minimum 30% intermediate homes</u></li> </ul>
<b>AM101</b>	<b>59</b>	<b>8.18</b>	Both the GLA <del>SHMA</del> Strategic Housing Market Assessment (SHMA) and Waltham Forest SHMA show that there is a significant need for low cost rental housing <del>and because</del> . <u>Because of this,</u> the remaining 40% affordable housing tenure <u>in Waltham Forest</u> is expected to be for low cost rented homes. Delivery of low-cost rental housing will be the priority <del>unless there are</del> <u>other than in</u> exceptional circumstances. <del>There is still a strong need for intermediate housing products which is reflected in the policy. To follow the Fast Track Route, applicants will be expected to follow this tenure split in line with Intend to Publish London Plan Policy H5 'Threshold approach to applications'.</del>
<b>AM102</b>	<b>59</b>	<b>New Paragraph after 8.19</b>	<u>There is however, still a strong need for intermediate housing products which is also reflected in the policy. To follow the 'Fast Track Route' set out under Part C of Policy 13 'Delivering Genuinely Affordable Housing', applicants will be expected to follow this tenure split in line with London Plan (2021) Policy H5 'Threshold approach to applications'.</u>
<b>AM103</b>	<b>61</b>	<b>8.20</b>	It is important to ensure that new housing is accessible to all and is adaptable to the changing needs of residents throughout their lives. Housing developments which consider inclusive design and accessibility issues at an early stage and throughout the development process are the most successful at achieving this. Accessible housing allows residents of the borough to live dignified and independent lives. Wheelchair user <del>dwelling</del> <u>dwelling</u> s should be distributed throughout a development to provide a range of aspects, floor level locations, views and unit sizes. This policy should be read in-conjunction with <del>Intend to Publish</del> London Plan (2021) Policy D7 'Accessible housing'.
<b>AM104</b>	<b>61</b>	<b>8.21</b>	The redevelopment and intensification of existing housing and housing estates, particularly those <del>that are</del> poorly laid-out <del>housing developments-out and</del> of lower density, is critical in meeting the borough's housing needs. It is important that such schemes increase the number of homes, ensure that affordable homes are not lost and <del>provides</del> <u>provide</u> a range of tenures. There are opportunities also to increase the <del>standards</del> <u>standards</u> of the homes in their design, accessibility and safety, as well as improving <u>the environmental quality</u> of the local area. This policy should be read in conjunction with other policies in this Chapter <del>but also in Chapter 7</del> <u>and in 'Creating High Quality Places'</u> .
<b>AM105</b>	<b>63</b>	<b>8.23</b>	It is important that these non-traditional housing schemes are located near services and transport. In addition, the delivery of these types of new homes should not lead to a reduction in the quality of accommodation and such schemes will be expected to be of high quality. This policy should be read alongside <del>the Intend to Publish</del> London Plan (2021) Policies H11,

			H15 and H16 <del>these will be supported and encouraged where they are of high-quality design and provide and contribute towards genuinely affordable housing.</del>
<b>AM106</b>	<b>64</b>	<b>8.24</b>	Small sites will play an important part in meeting the borough's housing needs and target. Increasing the rate of housing delivery from small housing sites is a priority. Small sites are defined as those below 0.25ha. The delivery of small sites will be achieved through incremental intensification of existing residential areas and town centres, or in areas with adequate public transport accessibility, which is considered to be PTAL 3 to PTAL 6. Additional guidance in the form of Design Codes and <u>SPDs</u> <u>Supplementary Planning Documents (SPDs)</u> may be produced to assist with the accelerated delivery of such sites.
<b>AM107</b>	<b>66</b>	<b>8.25</b>	HMOs comprise of <del>small</del> shared dwelling houses or flats occupied by between 3 to 6 unrelated individuals who share basic facilities. HMOs can form an important part of the housing stock, if they are of high-quality design, provide good quality living standards and adequate space for people to live in. These developments are expected to be located near or in town centres, as well as near public transport. However, all too often this is not the case and the Council has enforced against many poor quality HMOs and will continue to do so.
<b>AM108</b>	<b>67</b>	<b>8.29</b>	<del>Supported and Specialist accommodation meets a required need in the borough providing for is required to meet the needs of older, disabled, and vulnerable people. The Intend to Publish in the borough. The London Plan (20192021) identifies an indicative benchmark figure of 110 dwellings per annum for Waltham Forest as required to meet the needs of older Londoners for supported and specialist housing.</del> Retention and refurbishment will be supported where it still meets the needs of residents and is of <del>the</del> appropriate design quality for current <u>and/or</u> future residents. For new developments, <del>it</del> <u>proposals</u> must meet identified need, be of high-quality design and be located in areas that have <u>the</u> facilities the residents require and be located close to public transport.
<b>AM109</b>	<b>69</b>	<b>8.32</b>	Community Led Housing, Self-Build and Custom Build Housing can assist in meeting the borough's housing need and in providing a wide range of housing choices. Such schemes will be supported, <del>and encouraged on small sites or as part of estate regeneration, and, where appropriate, as part of larger developments.</del> Waltham Forest has a statutory duty to have a self-build register, <del>however, it and</del> allows residents to not only register their interest to for self build and custom build plots but also to put themselves forward for development of community-led housing. Definitions are stated in Table 8.7 below.
<b>AM110</b>	<b>70</b>	<b>8.33</b>	The main tools the Council has in delivering the policies in this section of the Plan are the: <ul style="list-style-type: none"> <li>• Planning application process;</li> <li>• Affordable Housing and Viability <del>SPD and Section 106 contributions.</del> <u>Supplementary Planning Document (SPD);</u></li> <li>• <u>Developer Contributions Supplementary Planning Document (SPD);</u> and</li> <li>• <u>Section 106 legal agreements.</u></li> </ul>
<b>AM111</b>	<b>70</b>	<b>8.34</b>	Additionally, affordable housing grant from the GLA, the Council's <del>own</del> <u>Capital Delivery Program and Programme and the Council's owned</u> housing development company - <u>Sixty Bricks</u> <del>will - all</del> play an important role in delivering housing, <del>and affordable housing.</del>

**Chapter 9: Building a resilient and Creative Economy**

Ref	Page	Policy / Paragraph	Modification
AM112	71	9.3	<p>Prior to COVID-19, Waltham Forest was successfully transitioning from a low employment to a high employment borough. The percentage of Waltham Forest residents who are economically active (74.8%) is higher than the London average (78.1%), but lower than the national average (78.9%), with the proportion of the population in employment exceeding the London and Great Britain average. The number of new business registrations grew by 98% between 2011-2018 compared to the London average of 58.5%. The median weekly pay of residents is well above the national average, at £680 per week, and is converging with the London average.<sup>(35)</sup> However, in 2018-19, 5% of residents were unemployed, ranking it 10th highest out of London’s 33 Boroughs.</p>
AM113	72	9.5	<p>The Digital and Creative sectors have flourished in the Borough over the last decade, partially due to the migration of businesses from other London boroughs. In recognition of this, a <u>Local Creative Enterprise Zone (CEZ)</u> has been designated in Blackhorse Road (see Policy 36 <u>Blackhorse Creative Enterprise Zone Lane</u> (see Policy 37 <u>'Blackhorse Lane Creative Enterprise Zone (CEZ)'</u>)).</p>
AM114	72	9.6	<p>Waltham Forest’s Employment Land <del>Review</del><u>Study</u> (2019) has identified an objectively assessed need for 8,100 jobs equating to <del>52,000sqm</del><u>52,000 sqm</u> of employment floorspace (identified B2, B8 and Class E Part G i, ii, iii) over the plan period. The Employment Land Audit (<del>2020</del><u>2021</u>) demonstrates that this objectively assessed need can be delivered through efficient and effective use of existing employment sites.</p>
AM115	72	9.7	<p>The need for different uses is identified as being for:</p> <ul style="list-style-type: none"> <li>• <del>18,848sqm</del><u>18,848 sqm</u> of office space (Class E Part G i / ii)</li> <li>• <del>36,604sqm</del><u>36,604 sqm</u> of distribution space (B8)</li> <li>• <del>-4,215sqm</del><u>4,215 sqm</u> of industrial space (Class E Part G iii / B2)</li> </ul>
AM116	72	Figure 9.1	Updated graphic

**78%** of Waltham Forest's **working-age residents** are in **employment** (September 2022)\*




There are approximately **72,000 jobs** in Waltham Forest (September 2022)\*\*



**9%** of the borough's working age population are **self employed** (2022)\*



Only **1%** in the borough employ **more than 50 people** (2022)\*\*\*



**Over 90%** of **businesses** in the borough employ **fewer than 10 people** (2022)\*\*\*

\* Annual Population Survey (ONS)  
 \*\* Business Register and Employment Survey (ONS)  
 \*\*\* Inter Departmental Business Register (ONS)

<b>AM117</b>	<b>73</b>	<b>9.8</b>	In line with the London Plan (2021), the 52,000 sqm additional floorspace is expected to be delivered through intensification and consolidation across existing employment areas. These are the designated employment areas of Strategic Industrial Locations (SIL) and Borough Employment Areas (BEA), in addition to the Locally Significant Industrial Sites which are introduced in this Plan (LSIS) and Borough Employment Areas (BEA). The Employment Land Audit (2020/2021) demonstrates that it is possible to achieve this level of increase. The following policies on the management of SIL, LSIS and BEA, and Non-Designated Employment Land set out how this can be delivered. Town Centres are also a good location for offices and light industrial uses, as they are well connected and have facilities that workers may want to be close to, as well as the possibility of attracting local customers.
<b>AM118</b>	<b>73</b>	<b>9.9</b>	The Employment Land Study (2019) states that the focus should be on a range of typologies to meet future demand and need. These comprise distribution uses related to logistics, industrial space, and the New London Mix. Distribution space will be directed to areas across the borough which have good access to the strategic road network. New London Mix will be supported in BEAs and designated town centres, and this policy should be read in line with Policy 31 'Workspaces' and Policy 32 'Affordable Workspace'
<b>AM119</b>	<b>75</b>	<b>9.10</b>	Strategic Industrial Locations (SIL) are the capital's main reservoirs of industrial land and are of strategic economic importance for London and as such will be safeguarded. Distribution and industrial and distribution uses (Class E Part G iii, Class B2 and Class B8) are the main focus for these areas. Over the years, Waltham Forest has lost some of its

			industrial land to other uses; the remaining industrial land is therefore critical to the borough's economic success and any new development in the SIL should not lead to any overall loss of <del>employment</del> <u>industrial floorspace</u>
<b>AM120</b>	<b>75</b>	<b>9.11</b>	Renewal and <del>upgrading</del> <u>upgrade</u> of employment space to ensure it is high quality and fit for purpose is important. Such proposals will be supported especially where <del>it allows</del> <u>they allow</u> for future flexibility, including both subdivision and amalgamation, as required, to meet needs.
<b>AM121</b>	<b>76</b>	<b>9.13</b>	Renewal and <del>upgrading</del> <u>upgrade</u> of employment space to ensure it is high quality and fit for purpose is important. Such proposals will be supported especially where <del>it allows</del> <u>they allow</u> for future flexibility, including both subdivision and amalgamation, as required, to meet needs.
<b>AM122</b>	<b>77</b>	<b>9.15</b>	Renewal and <del>upgrading</del> <u>upgrade</u> of employment space to ensure it is high quality and fit for purpose is important. Such proposals will be supported especially where <del>it allows</del> <u>they allow</u> for future flexibility, including both subdivision and amalgamation, as required, to meet needs.
<b>AM123</b>	<b>79</b>	<b>9.18</b>	Co-location, intensification and consolidation approaches are supported on non-designated employment land and further guidance will be set out in the Industrial Intensification <del>SPD</del> <u>Supplementary Planning Document (SPD)</u> .
<b>AM124</b>	<b>79</b>	<b>9.19</b>	The London Plan <del>sets out a masterplan approach to managing change in SIL and LSIS and BEA in Policy E7 Industrial intensification, co-location and substitution. The main aim of the masterplan approach is to make sure that industrial land is working efficiently and effectively to meet employment need now and over the plan period. The approach advocated in the London Plan to deliver this is intensification and consolidation to increase employment floorspace capacity and support the economies of London and Waltham Forest</del> <u>(2021) outlines a process for achieving intensification of designated industrial areas to provide additional industrial capacity. In some circumstances, where it would be to the benefit of the wider area, and demonstrably helps meet industrial and employment needs, this could facilitate the consolidation of industrial use on a designated site, potentially allowing for the subsequent introduction of non-industrial uses into these areas in order to meet other planning objectives.</u>
<b>AM125</b>	<b>80</b>	<b>9.24</b>	These areas will be determined with reference to the following factors: <ul style="list-style-type: none"> <li>• Current utilisation of land and sites (including plot ratio);</li> <li>• Current condition of the stock; Deliverability including land ownership;</li> <li>• Servicing both inside and outside of the site;</li> <li>• Ability for different uses to exist together;</li> <li>• Businesses' <del>intention</del><u>intentions</u></li> </ul>
<b>AM126</b>	<b>81</b>	<b>9.26</b>	The London Plan <u>(2021)</u> sets out a masterplan approach to delivering any change in SIL <u>and LSIS</u> with further guidance set out in the Industrial Practice Note. The masterplan approach can be delivered by a public sector body or private developer/ landowner, as long as it <u>is agreed with the GLA and the Council</u> . Each masterplan should take account of the proposed future vision of the SIL <u>or LSIS</u> area. Viability and Delivery are key components of the masterplan to prevent the loss of important industrial space across the borough. This should be accompanied with a plan which sets out how existing business will be retained and accommodated in any redevelopment. These should include consideration <del>on business</del> <u>of businesses</u> that need grow on space. Part of the process of redevelopment will require businesses to be decanted while business space is upgraded. Early engagement with businesses will be vital to the success of any proposed development. To ensure this is delivered successfully, a decant strategy will be expected to be submitted.
<b>AM127</b>	<b>81</b>	<b>9.27</b>	To ensure that employment uses are delivered and that no further employment capacity is lost in the borough, the employment elements of proposed <del>master plan</del> <u>masterplan</u> will be phased to be delivered first. This could be delivered via a



			hybrid planning application. Both completion and operation of the employment space is expected to be delivered ahead of the first occupation of any other use.
<b>AM128</b>	<b>81</b>	<b>9.29</b>	Ensuring that servicing and deliveries can function across the SIL <del>and/or</del> <u>LSIS</u> , especially when delivering intensification, consolidation or change is important to ensuring businesses can run effectively. Any redevelopment of <del>the</del> <u>SIL or LSIS</u> should include a <del>servicing and management plan</del> <u>Servicing and Management Strategy</u> to understand how it will impact on the existing businesses and existing servicing arrangements. In addition, any impacts on the wider transport network should be set out.
<b>AM129</b>	<b>82</b>	<b>9.30</b>	Design mitigation between industrial and non-industrial uses will be important to ensure that co-location can be delivered effectively. This should be designed with the industrial uses in mind, ensuring that their operation is not compromised, and <del>use the Agent of Change Principle</del> <u>principle applied</u> to do this. Other design mitigation that should be <del>consider</del> <u>considered</u> are safety and security, layout and orientation, public realm, and environmental health impacts such as noise and air quality.
<b>AM130</b>	<b>83</b>	<b>9.32</b>	Workspaces vary in the type of space they provide, from more traditional dedicated office, studio and workshop space, <del>towards</del> <u>to</u> a more flexible co-working offer
<b>AM131</b>	<b>83</b>	<b>9.34</b>	<del>Strategic Industrial Locations, Locally Significant Industrial Sites, Borough Employment Areas</del> <u>SIL, LSIS, BEA</u> , Walthamstow Major Centre and the borough's District Centres and some Neighbourhood Centres have been identified as the main destinations for workspace development.
<b>AM132</b>	<b>83</b>	<b>9.35</b>	Workspaces sit across <del>Use Classes</del> <u>different use classes</u> . In SIL and LSIS, other than through the <del>Industrial Masterplan Approach</del> <u>approach</u> set out in Policy 30 'Industrial Masterplan Approach', only workspace which falls within the uses set out as appropriate in <u>Part A of</u> Policy 26 'Safeguarding and Managing Change in Strategic Industrial Locations (SIL)' and Policy 27 'Safeguarding and Managing Change in Locally Significant Industrial Sites (LSIS)' will be acceptable.
<b>AM133</b>	<b>83</b>	<b>9.36</b>	New workspace development will contribute to the vitality and vibrancy of the <del>boroughs</del> <u>borough's</u> town centres by creating footfall and daytime activity, and will be able to capitalise on the benefits of good public and sustainable transport connectivity via; <del>Enjoy</del> Waltham Forest, London Underground, London Overground and local bus services.
<b>AM134</b>	<b>83</b>	<b>9.37</b>	As the borough's Creative Enterprise Zone, Blackhorse Lane will continue to be an area for regeneration, with specific investment directed into the provision of new <del>office and</del> low cost studio and workspace to <del>supporting</del> <u>support</u> the area's existing and emerging creative industries.
<b>AM135</b>	<b>84</b>	<b>9.38</b>	<del>Space delivered needs to</del> <u>Workspace should</u> be flexible and adaptable to suit a range of needs and different occupants. <del>These include,</del> <u>including by</u> providing a range of sizes and types. New workspace should provide a basic fit out beyond shell and core. This will ordinarily include all finishes, suspended ceilings, raised floors, and the extension of mechanical and electrical services to the working area of the building. In general, the fit out must have all the essentials which could reasonably be expected by any occupier. <u>Early engagement with operators and potential occupiers is central to the design and delivery of successful workspace.</u>
<b>AM136</b>	<b>84</b>	<b>9.42</b>	<u>The pledge has four aims:</u>  The pledge has four aims: <ul style="list-style-type: none"> <li>• <del>limiting</del> <u>Limiting</u> the conversion of office space to residential space through permitted development rights;</li> <li>• <del>encouraging</del> <u>Encouraging</u> the provision of affordable workspace through planning policy and good practice;</li> </ul>

			<ul style="list-style-type: none"> <li>• <del>ensuring</del><u>Ensuring</u> new developments include non-residential space suitable for the needs of small businesses; <u>and</u></li> <li>• <del>seeking</del><u>Seeking</u> funding and partnerships to create new space for start-ups, small businesses, the creative industries and artists</li> </ul>
<b>AM137</b>	<b>85</b>	<b>9.43</b>	It is expected that <u>affordable</u> workspace will be delivered on site. Where this is not possible, payment in lieu will be accepted. The payment in lieu process will be set out in the <del>Planning Obligations SPD</del> <u>Developer Contributions Supplementary Planning Document (SPD)</u> . For space that is provided on site, it <u>is</u> expected that this will be delivered as space held at a discount below market rent. This will ensure that rents are set at an affordable level for local businesses.
<b>AM139</b>	<b>85</b>	<b>9.45</b>	Early engagement with operators and potential occupiers is central to the design and delivery of successful workspace. Further guidance will be provided in an Affordable Workspace Strategy and the <del>Planning Obligations SPD</del> <u>Developer Contributions Supplementary Planning Document (SPD)</u> .
<b>AM140</b>	<b>85</b>	<b>9.46</b>	Affordable workspace and contributions will be secured via Section 106 <del>agreement</del> <u>agreements</u> .
<b>AM141</b>	<b>86</b>	<b>9.49</b>	It is important for all Waltham Forest residents to have access to opportunities for training and skill development. The <del>Planning Obligations SPD</del> <u>Developer Contributions Supplementary Planning Document (SPD)</u> sets out the structure for the negotiation and compliance of S106 obligations to capture the opportunities of growth and ensure Waltham Forest residents have access to high quality employment across the borough.
<b>AM142</b>	<b>86</b>	<b>9.51</b>	There is opportunity to widen the type of uses within <del>in</del> the borough's railway arches to support wider commercial, business and service uses, falling in the rest of Class E <u>and drinking establishments</u> , especially around station hubs, town centres or as part of wider regeneration and renewal. This will help to boost the vitality and vibrancy of the area surrounding the railway arches and contribute to the diversity of town centres.
<b>AM143</b>	<b>87</b>	<b>9.52</b>	Some railway arches are located in residential and noise sensitive areas. Similar to the borough's employment sites, it is important for new developments to adopt suitable design measures to avoid impacts and reduce disturbances to sensitive uses, obstruction of public realm and adverse impacts to the railway line.
<b>AM144</b>	<b>87</b>	<b>9.54</b>	The main tools the Council has in delivering the policies in this section of the Plan are: <u>Industrial Masterplans</u> ; <ul style="list-style-type: none"> <li>• Industrial Intensification <del>SPD</del><u>Supplementary Planning Document (SPD)</u>;</li> <li>• <del>Planning Obligations SPD</del><u>Developer Contributions Supplementary Planning Document (SPD)</u> and Section 106 contributions-; <u>and</u></li> <li>• <del>Planning</del><u>The planning</u> application process</li> </ul>

Chapter 10: Promoting Culture and Creativity			
Ref	Page	Policy / Paragraph	Modification
AM145	88	10.1	Waltham Forest is an important cultural centre in London and the borough's designation as the first ever Mayor of London Borough of Culture in 2019 is testament to this. The Local Plan <del>therefore</del> plays an important role in ensuring the Council builds a lasting legacy from the <del>opportunity 2019 presents which benefits</del> <u>opportunities 2019 presented, which benefits the whole of its culturally diverse population.</u> The Council is preparing a cultural impact strategy around three themes: <u>culture as a bond; culture as identity and culture as the future.</u> The Local Plan's role in delivering this is to ensure that places <del>where culture is produced and consumed are supported, protected and enhanced</del>
AM146	88	New Paragraph after 10.1	<u>The Council has approved a new Destinations Strategy to establish Waltham Forest as a "Destination Borough", engaging residents, enabling creativity, celebrating our individuality and utilising our resources to ensure viability, impact &amp; legacy, and is now working on a specific Culture Strategy to develop its vision and ambitions further around facilitation of cultural production and programming across the borough and support for creative organisations, including affordable work space.</u>
AM147	88	10.2	<p><del>Culture Infrastructure capture</del> <u>infrastructure captures</u> both cultural consumption (places where culture is experienced, participated in, exhibited or sold) and culture production (places of creative production, where creative work is made, usually by artists, performers, makers, etc), in alignment with the London Cultural Infrastructure Plan (2019) and Map. Taking this definition into consideration, Waltham Forest has been a leading borough in recognising the value of investing in culture and has sought to take forward interventions to help support this. The Council identified, based on the Audience Spectrum Page population grouping <u>profiling tool</u>, <sup>(68)</sup> that <del>77% of residents are urban and culturally diverse – where their arts and cultural activities happens in their communities and outside the mainstream (46% Kaleidoscope Creativity and 31% Experience Seekers).</del> There is also an important representation of students and recent graduates in this group. This group is higher than London residents overall, with 47%. <u>Waltham Forest is most strongly comprised of two population groups:</u></p> <p><u>Kaleidoscope Creativity (46% of Waltham Forest residents, compared with only 32% of London residents overall). The profile for this grouping suggests these residents are “urban and culturally diverse, their arts and cultural activity happens in their community and outside the mainstream (Lower engagement)”;</u> and</p> <p><u>Experience Seekers (31% of Waltham Forest residents, compared with only 15% of London residents overall). The profile for this grouping suggests these residents are</u></p>
AM148	88	10.3	The creative and cultural economy is an important economic contributor <del>and</del> <u>in the borough,</u> <del>and</del> <u>it is growing.</u> Cultural, arts, entertainment and visitor attractions support the vitality and vibrancy of the borough's places. It is also an important part of the community and social infrastructure <del>in</del> <u>of</u> the borough as it brings people together, encouraging community cohesion and building social capital. Nationally, Arts Council England has identified that arts and culture directly contributed £10.6 billion in 2016 to the national economy with the indirect (supply chain) with induced spending effects of this adding a further £12 billion of value. These figures <del>have increased year on year since the first report of this</del> <u>its kind was published in 2013, as well as employment which by 2016 was</u> <u>did employment figures in the sector - which, by 2016, were over 360,000</u> <sup>(79)</sup> .
AM149	89	10.4	Creative Businesses have <del>been growing</del> <u>grown</u> faster in Waltham Forest <del>compared with London</del> <u>than London as a whole,</u> achieving 85% growth over the five-year period <del>(2014-2019)</del> <u>from 2014 to 2019.</u> <sup>(810)</sup> This is equivalent to an additional 885 businesses and exceeds the growth rate across all industries in the <del>Borough</del> <u>borough</u> (52%). <del>As the</del> <u>Figure</u>

			<p>10.2 Business Activity by Creative Sub-Sector in Waltham Forest (2014 - 2019) shows, the largest creative <del>subsector</del><u>sub-sector (2014 - 2019)</u> is IT, software and computer service <del>with (38%)</del>, followed by Film, TV, video, radio and photography <del>with (20%)</del>. In terms of <del>employment</del><u>employment</u>, the borough has 2,500 creative sector jobs, which makes up 4% of total employment. This falls below the London average <del>(of 10%)</del> and, but is in line with the Outer London average <del>(of 5%)</del>. Nevertheless, creative jobs <del>have expanded by 64% in the borough and this over the five year period from 2013 to 2018, which is equivalent to an increase of circa. 1,000 jobs over a five-year period (2013-2018).</del><sup>(911)</sup></p>
<b>AM150</b>	<b>90</b>	<b>10.5</b>	<p>The Council's Cultural Infrastructure Study (2020) <del>has</del> identified that there are a significant number of creatives living and working in the borough. These <u>are</u> artists, designers and other creative professionals, and the creative industries contribute strongly to the local economy. It is a sector that is supported in the borough. Accordingly, <del>this policy</del> <u>the policy in this chapter</u> should be read in conjunction with policies in the previous chapter: 'Building a Resilient and Creative Economy'.</p>
<b>AM151</b>	<b>91</b>	<b>10.6</b>	<p>Waltham Forest's cultural attractions are not <del>only museums</del> <u>limited to museums and galleries</u>, such as the <del>Vestry, William Morris Gallery, Queen Elizabeth's Elizabeth</del> Hunting Lodge and Vestry House Museum, but <u>also include</u> important outdoor space such as Epping Forest, <del>Lea Lee</del> Valley Regional Park and the <u>Walthamstow Wetlands and Fellowship Square</u>. There is scope to use outdoor space and public realm for cultural purposes and events. Public art, exhibitions and events play an important role allowing everyone to have access to culture and these are supported and encouraged.</p>
<b>AM152</b>	<b>91</b>	<b>10.7</b>	<p>This policy seeks to promote culture, creativity, public art and entertainment as part of the place making process and <u>in order to enhance local identity</u>. <del>New major developments</del> <u>Where necessary, new major developments that propose cultural or entertainment uses outside Major or District Centres</u> will need to follow the sequential test set out in <del>and demonstrate why they are not located in a major or district centres</del>. Areas Policy 40 'New Retail, Office and Leisure Developments'. However, <u>as set out in Policy 36 'Promoting Culture and Creativity' areas</u> in the borough that are highly accessible by public transport, but <del>are outside of major or district centres</del> will also be considered to be appropriate locations for major developments for <u>outside Major or District Centres, are considered appropriate for major arts, culture, entertainment and visitor facilities</u> as well as smaller scale proposals. <del>The Council's Culture Infrastructure Study identifies how cultural space can provide valuable facilities and play an important role in positioning London and the borough as a culture reference.</del></p>
<b>AM153</b>	<b>92</b>	<b>10.8</b>	<p>Ensuring that land and facilities are used efficiently is important for the borough and <u>will may</u> require the dual use of sites for a <del>wider</del> range of uses, including cultural uses. Cultural uses also have the ability to activate vacant units in town centre locations and along high streets. <del>It will also be expected that</del> <u>Where appropriate, social and community infrastructure uses will be expected to offer space for arts and culture</u>. There is also an opportunity to use the public realm and outside space for cultural activities, especially in parks and town centres.</p>
<b>AM154</b>	<b>92</b>	<b>10.9</b>	<p>The Council <del>intends to</del> <u>will</u> support opportunities to use vacant buildings, land and open spaces for flexible and temporary meanwhile uses or 'pop-ups', especially for alternative cultural day and night-time uses. This <del>is</del> <u>also presents an</u> opportunity for community uses, particularly those that are transient or may <u>have operate on a short lifetime frame</u>. Cultural and creative uses, whether long or short term, can enliven town centres <del>whilst also reducing and reduce</del> anti-social behaviour.</p>

AM155	92	10.10	<p>The Council is preparing a Cultural Strategy which will set out <del>the</del><u>a</u> list of cultural enhancement projects to be delivered including:</p> <ul style="list-style-type: none"> <li>• Subsidised spaces for cultural tenants and creative workspace including artist studios. Permanent arts commissions integrated within landscaping or building features.</li> <li>• Early activation through temporary creative projects <del>through the</del><u>during a</u> development's construction phase.</li> <li>• Support for local festivals and related cultural activity.</li> <li>• Creative ways for local communities to participate, co-create and share good practice</li> </ul>
AM156	92	10.11	<p>In securing these projects, the Council <del>intends to</del><u>will</u> work proactively with developers and applicants <del>for planning permission.</del></p>
AM157	93	10.13	<p>Public houses play an important role at the heart of many local communities, and the National Planning Policy Framework (NPPF) (<del>2012</del><u>2021</u>) identifies them as a community <del>facility that contributes</del><u>facilities that contribute</u> to enhancing the sustainability of communities and residential environments. They have historically provided social hubs for diverse communities, especially LGBTQ+ <sup>(40)</sup><del>and BAME</del><u>Ethnic</u> <sup>(44)</sup><del>communities;</del><u>Minority communities, as well as</u> making a positive social contribution to townscape and local identity. Today they <del>provide</del><u>play</u> an important role in promoting community cohesion; <del>and offering</del><u>and</u> offering opportunities for people from different walks of life to mix. More than just a place to relax and drink, they can provide social, recreational and cultural facilities and services, hosting events; <del>and clubs,</del><u>and</u> <del>provide</del><u>providing</u> informal meeting spaces for local interest groups and visitors.</p>
AM158	94	10.14	<p>Public houses also have a strong role to play in supporting the local economy. They can help bring activity and vibrancy to <del>our</del><u>high</u> streets, and provide employment opportunities, both directly, and indirectly; <del>by supporting food suppliers and brewing industries.</del> Supporting such <del>industries</del><u>businesses</u> is particularly <del>important</del><u>relevant</u> given the importance of the food and drinks industry to Waltham Forest.</p>
AM159	94	10.15	<p>The Council identified 69 pubs in the borough in <u>2020</u> <sup>(42)</sup><del>13</del> <del>The 2019 Pubs Cultural Report,</del> <u>Both the 2019 London Pubs Annual Data Note, Cultural Infrastructure Report (August 2019) (part of The Mayor of London's</u> <del>the Mayor's Cultural Infrastructure Plan,</del><u>) and the borough's Cultural Infrastructure Study (2020)</u> registered that over recent years local pubs across London and the borough have been lost. This policy therefore seeks to protect those pubs that exist <del>and also allow,</del> <u>whilst allowing</u> for new ones to <u>be delivered</u> in town centres and other accessible locations, particularly where they provide wider community <del>facilitates</del><u>facilitates</u> and employment.</p>
AM160	94	10.16	<p>Given the value public houses bring to local communities, evidence must be provided that all avenues for retaining them have been exhausted before alternative <u>community uses can be considered</u>. <del>Further detail on the applications of this policy is included in the Waltham Forest Pubs Supplementary Planning Document.</del> With regard to marketing evidence, firstly, evidence should be provided that the existing business is no longer financially viable. Insufficient evidence of attempts to diversify the business may indicate that the public house use could be made viable. As a failing public house may be given a new lease of life under alternative ownership, the Council will require evidence that it has been sufficiently marketed for <del>such use</del><u>24 months</u> without genuine interest before any alternative <u>community uses</u> can be considered.</p>

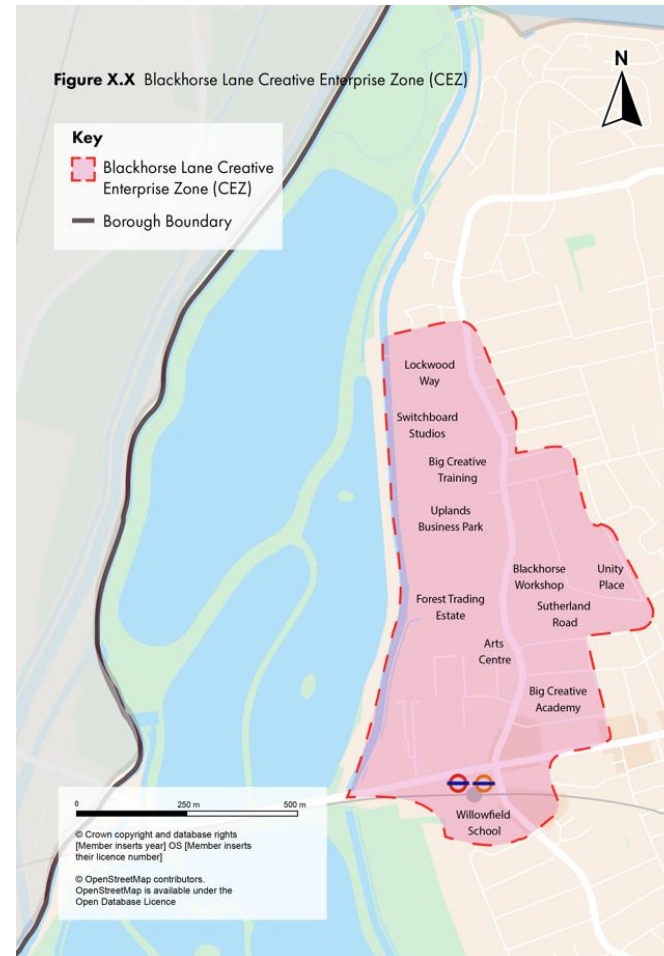
AM161

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10.17

Blackhorse Lane is home to many of the borough's creative and cultural industries. Examples of the spaces and uses located in the area include Blackhorse Workshop, Big Creative Academy, Switchboard Studios and Gnome House (see figure 10.3). It is not only the spaces and businesses located in Blackhorse Lane that make it an important area but how this has turned into an ecosystem the way in which they function as a creative ecosystem, with important supply chains linked across the area. It is because of this ecosystem that the Council has selected it to be identified it as a Creative Enterprise Zone in line with the Intend to Publish London Plan (20192021) Policy HC5 'Supporting London's culture and creative industries Culture and Creative Industries', criteria B and C, and using the Mayor's self-accreditation scheme. Figure 10.3 also sets out the boundary of the Creative Enterprise Zone where the policy takes effect applies.

Replacement CEZ Map 10.3:



<b>AM162</b>	<b>97</b>	<b>10.18</b>	<p>Creative Enterprise Zones are focused around <u>the following</u> four pillars:</p> <p><del>Space:</del><b>Space:</b> Permanent, affordable, creative workspace and live-work spaces at below market rents and ensuring no net loss of space;</p> <p><del>Skills and support:</del><b>Skills and support:</b> Building entrepreneurial skills and offering business support to artists, start-ups, sole traders, micro-sized and small businesses, developing career pathways and opportunities for progression into the creative industries and supporting sectors;</p> <p><del>Policy:</del><b>Policy:</b> Local Plans with pro-culture policies in planning, housing, business development, technology and infrastructure, and supportive business rates policies; and</p> <p><del>Community:</del><b>Community:</b> Embedding creative production in communities, creating socially-inclusive places and strong links with education providers.</p>
<b>AM163</b>	<b>97</b>	<b>10.19</b>	<p>The <del>policy</del><u>Local Plan</u> seeks to meet the objectives of the four pillars by protecting and supporting the delivery of new <del>space;</del><u>creative workspace</u>, securing Section 106 contributions towards jobs in creative industries, providing infrastructure to support <u>the</u> creative economy and by having pro -culture polices. <del>This policy aims to do this and is supported by a range of policies across the rest of the Plan and the London Plan.</del></p>
<b>AM164</b>	<b>97</b>	<b>10.20</b>	<p>Affordable workspace will be secured via Section 106 agreement with further <del>Section 106 SPD</del><u>guidance provided in the Developer Contributions Supplementary Planning Document (SPD)</u>. Affordable workspace is defined here as workspace that provides rents maintained below the market rate in line with Policy 33 'Affordable Workspace' and <del>in the Intend to Publish London Plan (2019)</del><u>London Plan</u> Policy E3 'Affordable Workspace'. In the Blackhorse <u>Lane</u> CEZ the priority will be affordable workspace for <u>the</u> cultural and creative sectors <u>, in line with Policy 33 – Affordable Workspace.</u></p>
<b>AM165</b>	<b>97</b>	<b>New Paragraph</b>	<p><u>Development proposals in the CEZ are expected to adhere to the Agent of Change principle in order to ensure that the continued industrial and creative functions of Blackhorse Lane are protected.</u></p>

<b>Chapter 11: Distinctive Town Centres and High Streets</b>			
<b>Ref</b>	<b>Page</b>	<b>Policy / Paragraph</b>	<b>Modification</b>
<b>AM166</b>	<b>98</b>	<b>11.1</b>	<p>This section sets out the policies for managing growth and change in <del>town centre uses</del><u>the borough's town centres</u>. The National Planning Policy Framework (NPPF) (2021) defines main town centre uses as including retail, leisure, entertainment facilities, recreation uses, offices and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities). In planning for <u>good, inclusive growth</u>, it is necessary to</p>

			ensure that there is a good choice and range of town centre uses at the most appropriate locations for existing and future residents.
<b>AM167</b>	<b>98</b>	<b>11.2</b>	<p>Policies in this chapter of the <del>plan</del><u>Plan</u> have been prepared at a time of uncertainty associated with the Covid-19 pandemic. <del>While</del><u>Whilst</u> the full effects of the pandemic in the <del>short, medium or long term remain uncertain</del><u>long term are yet to be seen</u>, it is expected that the trend towards changing consumer habits which started prior to Covid-19 will continue, <del>also</del> <u>- accelerated by the life style</u><u>lifestyle</u> changes associated with greater homeworking and less travel to <del>central locations such as the</del> Central London and other places for work or other economic activity. Accordingly, <del>the Council considers</del><u>it is likely</u> that there will <u>continue to</u> be a larger day-time <del>population</del><u>populations</u> working locally for the foreseeable future, presenting an opportunity for the borough's centres to re-imagine themselves <del>in terms of workspaces (touchdown, meeting spaces), shopping facilities etc, capturing linked trips and local spend</del> <u>to capture local trips and spend that were previously diverted elsewhere.</u></p>
<b>AM168</b>	<b>98</b>	<b>11.3</b>	<p><del>It is however acknowledged that there would be some challenges for some commercial occupiers that may be forced to close resulting from the adjustments to the spatial organisation of activities that may arise.</del> Accordingly, <del>a</del> flexible policy approach has been set out in this chapter <del>of the plan</del> to guide and manage change going forward, supported by other initiatives the Council is taking to restore confidence in the <del>boroughs designated</del><u>borough's town centres</u> and deliver ambitious plans to re-shape them for the future. <u>See, for example, the</u> <del>In this regard, the Council has published the strategy document -</del> Waltham Forest High Streets Action Plan, June 2020.</p>
<b>AM169</b>	<b>98</b>	<b>11.4</b>	<p>Prior to the Covid-19 pandemic, an assessment of the need for retail floorspace during the <del>plan period</del><u>Plan Period</u> (up to 2035) was undertaken as part of the Waltham Forest Retail &amp; Town Centres Study 2019. Evidence from the study indicates a reduced requirement for net additional retail floorspace across the Borough in short to medium term. For convenience retail, the study indicates a projected need of only <del>4700</del><u>1,700</u> sqm by 2029 and <del>3600</del><u>3,600</u> sqm by 2035. Comparison retail floorspace need is also projected to be <del>3700</del><u>3,700</u> sqm by 2029 and 15,000 by 2035. The study notes the significant impact upon available net additional quantitative capacity arising from recent retail commitments and also a number of factors including the on-going challenges faced by the UK retail sector generally. Crucially, the study also notes that less reliance should be placed upon the 2035 forecast due to the time periods involved, <u>and the NPPF advice (2021) advises that local authorities can focus upon</u> <del>on</del> at least 10 years into the future <del>and not the whole of the development plan period</del><u>rather than the whole Plan Period</u>. Accordingly, <del>the plan</del><u>this Local Plan</u> places a reduced weight on 2035 forecasts.</p>
<b>AM170</b>	<b>100</b>	<b>11.5</b>	<p>Waltham Forest has a well-established network of <del>town</del><u>designated</u> centres, <u>made up of Walthamstow Town Centre (as the borough's Major Centre), District and Neighbourhood Centres and Local Retail Parades.</u> The borough's network of <u>designated</u> centres are not just focal points for shopping and services, but also hubs for people to work, live and socialise. In planning for <u>inclusive</u> growth, the borough's <u>designated</u> centres will need to evolve and adapt to meet new challenges and become successful and attractive destinations for shopping, employment, entertainment and leisure <del>activities.</del><u>The NPPF activities.</u> The NPPF (2021) requires Local Plans to define a network and hierarchy of <u>designated</u> centres that is resilient to anticipated economic changes. <del>This policy</del> Policy 39 'Hierarchy of Centres' accords with the NPPF (2021) and the London Plan (2021) by defining the centres within Waltham Forest's town centres hierarchy and setting out the locational priorities for directing growth to individual centres in the hierarchy. <del>It is also necessary to protect these centres and parades to safeguard the provision of the town centre services and facilities for local residents, businesses and visitors to the borough.</del></p>



			<del>These centres have developed over many years and will need to be improved to perform their respective roles in the provision of town centre services and facilities.</del>
<b>AM171</b>	<b>100</b>	<b>New Paragraph</b>	<u>It is also necessary to protect these designated centres and parades to safeguard the provision of town centre services and facilities for local residents, businesses and visitors to the borough. These centres have developed over many years and will need to be invested in and improved to perform their respective roles successfully.</u>
<b>AM172</b>	<b>100</b>	<b>11.6</b>	<del>Walthamstow Town Centre</del> <b>Walthamstow Town Centre</b> is the primary retail centre and economic heart of the borough. <del>District centres</del> <b>District Centres</b> have a more localised role and <del>are intended to complement Walthamstow by providing</del> <u>provide</u> reasonably sized facilities for main and bulk convenience food shopping and a reasonable range of comparison shopping facilities. These centres have some small to medium or large food store anchors together with some comparison shopping. This <del>plan</del> <u>Plan</u> seeks to reinforce their role by ensuring the provision of appropriate local shopping, leisure and community facilities to make them the hub of everyday life for the communities they serve.
<b>AM173</b>	<b>100</b>	<b>11.7</b>	<del>Neighbourhood centres will</del> <b>Neighbourhood Centres</b> provide local convenience shopping facilities for local residents within walking distance of their homes. They <del>will</del> <u>should</u> be the hub for other facilities provided in and around them, such as small office and service uses, schools, doctor's surgeries, community centres and open space. <del>These centres will be</del> <u>Neighbourhood Centres are expected to provide neighbourhood centre type uses and facilities commensurate with their scale and function within the hierarchy.</u>
<b>AM174</b>	<b>100</b>	<b>11.8</b>	<del>Local Retail Parades</del> <b>Local Retail Parades</b> comprise a small <del>grouping</del> <u>groupings</u> of shops within one or two parades often including <del>the newsagent, a general grocery store, a post office and occasionally a pharmacy, hairdresser</del> <u>newsagents, general grocery stores, sub post offices and occasionally pharmacies, hairdressers and/or other small shops of a local nature.</u> These parades serve immediate local needs only and provide primarily convenience goods within residential, commercial or mixed-use areas. To create more sustainable development forms, <u>including 15 Minute Neighbourhoods,</u> careful management of local retail parades will be necessary to encourage the development of <del>an</del> <u>appropriate grouping</u> <u>groupings</u> of local shops and facilities.
<b>AM175</b>	<b>101</b>	<b>New paragraph</b>	<u>In line with national policy and the London Plan, this policy seeks to direct new investment in main town centres uses (as defined by the NPPF (2021)) and other supporting services and facilities to the borough's designated centres.</u>
<b>AM176</b>	<b>101</b>	<b>11.9</b>	Schemes that are poorly located can detract from quality of life, and compromise the achievement of social and environmental objectives, for example by drawing trade away from existing centres and leading to their decline. The London Plan (2021) designates Walthamstow Town Centre as a major centre. Accordingly, it is necessary to protect its dominant position and improve its trading performance for shopping activities, particularly higher order comparison goods. <u>Accordingly, This Plan therefore directs the majority of additional retail growth will be located into this centre. In addition, investment will order to deliver 15 Minute Neighbourhoods, additional investment will also be directed to other district and neighbourhood centres</u> <del>the borough's District and Neighbourhood Centres,</del> subject to available site specific capacity and <u>wider</u> impact considerations.
<b>AM177</b>	<b>101</b>	<b>11.10</b>	<del>In line with national policy and the London Plan, this policy seeks to direct new investment in main town centres uses (as defined by the NPPF) and other supporting services and facilities to the designated centres.</del>

<b>AM178</b>	<b>101</b>	<b>11.11</b>	Locating retail development and other main town centre uses within Walthamstow Town Centre, District and Neighbourhood Centres is the most sustainable way of meeting the needs of borough residents. It helps maximise the accessibility of facilities and promotes linked trips which reduces the need to travel and can increase footfall to the benefit of businesses. The scale and distribution of new retail, leisure or office development will need to be carefully controlled in order to ensure that new facilities do not detract from the success of the borough's designated centres, or make it more difficult for residents, workers and visitors to meet their shopping and leisure needs in a sustainable way.
<b>AM179</b>	<b>102</b>	<b>11.12</b>	To retain and develop their vibrancy and vitality, the designated centres must <del>also</del> have an appropriate mix and balance of <u>uses</u> - not only retail, but <u>also</u> leisure, cultural and service provision <del>which all contribute to a centre's success. In particular, in response to the</del> backdrop of changes in retailing <del>with, particularly</del> the continued growth in online shopping, it is necessary to ensure that the borough's centres vary in scale, function and composition of uses. Accordingly <del>when considering proposals,</del> the individual situation of centres will be taken into account <del>in the determination of proposals when determining planning applications.</del>
<b>AM180</b>	<b>102</b>	<b>11.13</b>	The sequential approach, as required by <del>government policy (NPPF)</del> <u>the NPPF (2021)</u> indicates that <del>town, district and local centres</del> <u>Major, District and Neighbourhood Centres</u> are the preferred locations for <del>the</del> main town centre uses. This approach indicates that first preference for new developments should be within centres, <u>followed</u> by edge-of-centre locations. Out-of-centre locations should be the last in the order of preference.
<b>AM181</b>	<b>102</b>	<b>11.14</b>	The submission of <del>impact assessments</del> <u>Retail Impact Assessments</u> for retail and leisure developments <del>located</del> <u>proposed</u> outside town centres is in accordance with the NPPF <u>(2021)</u> . This is an important requirement as part of the validation process of a planning application
<b>AM182</b>	<b>102</b>	<b>11.15</b>	Generally, a <del>retail impact assessment</del> <u>Retail Impact Assessment</u> is necessary when the proposed development is of a scale likely to have an appreciable impact on the trade of existing or committed retail, leisure and office developments in the surrounding area. The NPPF <u>(2021)</u> sets out the scope of impact assessments. It mentions that where an application fails to satisfy the sequential test or is likely to have significant adverse impacts it should be refused. Therefore it is expected that the scope of any such assessment would be agreed with the Council in advance before the impact assessment work commences. Impact assessments will need to take into account the wider cumulative impacts on town centre health and investment where there are commitments (i.e. planning permissions) and development plan allocations for similar types of retail and leisure use in the wider catchment.
<b>AM183</b>	<b>102</b>	<b>11.16</b>	This <del>plan</del> <u>Plan</u> sets a local floorspace threshold of <del>200 sqm</del> <u>2500 sqm</u> , over which proposals will require <u>Retail Impact Assessments</u> . The policy also applies to extensions and the amalgamation of existing retail units which <u>would</u> result in the creation of a single unit exceeding <del>200</del> <u>2500</u> sqm. It also <del>generally applies to s73 and s106a</del> <u>Section 73 and Section 106a</u> applications to vary conditions associated with planning permission. <del>As justification, it is considered that many small out-of-centre developments could cumulatively impact on the vitality and viability of nearby designated centres and parades.</del> <u>permissions.</u>
<b>AM184</b>	<b>103</b>	<b>11.17</b>	This threshold is <del>also</del> considered necessary to implement the Council's planning objective to consolidate town centre activities in <del>the</del> designated centres, support the vitality and viability of the designated centres and manage the proliferation of retail and other town centre uses throughout the borough. In applying this threshold, the Council will ensure that vulnerable

			centres/local parades do not experience further decline from trade diversion arising from the development of out-of-centre retail, leisure and office developments.
<b>AM185</b>	<b>104</b>	<b>11.18</b>	There are a number of retail and commercial premises outside the designated centres and parades, particularly along the main road corridors of the borough including Forest Road, Chingford Mount Road, Lea Bridge Road, Hoe Street, Leyton High Road and Leytonstone High Road. The current challenges facing the retailing industry <del>arising from</del> , <u>including the growth of online shopping, and changing shopping patterns etc</u> , could lead to significant vacancies in some frontages. This policy seeks to manage retail decline by consolidating retail activities within compact retail core areas of the designated centres and parades and also encourage alternative uses in declining areas that may occur through the process of change.
<b>AM186</b>	<b>104</b>	<b>11.19</b>	Residential development appropriately located in designated centres <del>e.g. - for example</del> on the upper floors of shops and other commercial buildings in town centres <del>have</del> <u>has</u> an important role to play in complementing new and existing retail and commercial uses. The provision of an appropriate mix of uses, both within areas and in individual buildings, has positive benefits for the borough's designated centres. A mix of uses on individual sites and across an area will support vitality and viability and promote the creation of successful places.
<b>AM187</b>	<b>104</b>	<b>11.22</b>	The development of distinctive centres, each with a unique 'offer' in terms of the range of activities <del>offered</del> and place setting is particularly necessary to support the vitality and viability of the <del>Borough's</del> <u>borough's town</u> centres. This policy seeks to encourage a greater degree of differentiation and specialisation between centres and avoid competition with regard to the types/nature of activities offered and to create a more diverse offer in different places.
<b>AM188</b>	<b>104</b>	<b>11.23</b>	<del>Policy 39 (4)</del> <u>The policy also</u> seeks to ensure that satisfactory standards are achieved in terms of how new uses are integrated in both function and design with adjoining uses along commercial and shopping frontages. This particularly relates to areas of change or renewal, where shops are declining and being replaced by alternative uses. In such areas, it is <del>necessary</del> <u>particularly important</u> to ensure that proposals contribute to the general appearance and character of the area, <del>in particular, especially</del> at street level.
<b>AM189</b>	<b>105</b>	<b>11.24</b>	Accordingly, in determining planning applications, <del>the nature of the proposed use and the implications on neighbouring amenity will be important considerations. In addition, the impact of the proposed use on the character and function of the parade or frontage in which it is located is equally important, that is, how well (in</del> <u>will be important considerations. That includes how well - in terms of design and appearance)</u> <del>the proposed use can be integrated within the existing street block or frontage. The nature of the proposed use and any implications on neighbouring amenity will be equally important considerations.</del>
<b>AM190</b>	<b>105</b>	<b>11.25</b>	In some situations, responsive design solutions will be necessary to ensure satisfactory integration. For example, <del>in predominantly commercial frontages businesses who find themselves next to newly converted residential units may face complaints from residential neighbours regarding noise, traffic or other issues. For this reason, the comprehensive redevelopment or conversion of a group of properties along a retail or commercial parade would be better. Accordingly, it will be important to ensure that conversions to residential uses are coordinated and well managed</del> <u>it will be important to ensure that conversions to residential uses - where they align with the policies of this Plan and any other local planning guidance or directions - are coordinated and well managed. Without such an approach, businesses in predominantly commercial frontages, who find themselves next to newly converted residential units may face complaints from residential neighbours regarding noise, traffic or other issues.</u>
<b>AM191</b>	<b>105</b>	<b>11.26</b>	This section sets the policies that will apply in managing changes of use within and outside the designated centres. Well managed, <del>changes of use could</del> <u>can</u> bring positive regeneration benefits. National permitted development rights play an

			important role in helping high streets adapt to changes in how people shop and use the high street. The impact of online retailing on shopper behaviour and its consequences for town centres and high streets has been evident in recent years nationally and locally. Government policy ( <del>NPPF, 2019</del> in the NPPF (2021)) acknowledges the need for greater flexibility for changes of use to occur in high streets and town centres by allowing existing premises to change to a wider range of uses.
<b>AM192</b>	<b>105</b>	<b>11.27</b>	The Town and Country Planning (Use Classes) Order 1987 (as amended) puts uses of land and buildings into various categories known as 'Use Classes'. <del>The</del> <u>In 2020, the Business and Planning Act 2020</u> introduced a significant change to the Use Classes Order. <del>New regulations (effective from 1 September 2020), and</del> introduced a broad category of 'commercial, business and service' uses, known as Class E, along with Class F 'community and learning'. The new Class E effectively <del>amalgamates the existing</del> <u>amalgamated previous</u> Class A1 (retail), Class A2 (financial and professional services), <u>Class A3</u> (restaurants/cafes), <u>Class B1</u> (offices) along with health/medical uses, creches, nurseries (all formerly D1 uses) and indoor sports/recreation (formerly D2 use). <del>Permission</del> <u>Under permitted development rights, planning permission</u> is not required to change between any of the uses within the new Class E, <u>or between Class E and Class C3 (dwellinghouses)</u> . The policies in this section of the Plan apply where planning permission is required for a change of use.
<b>AM193</b>	<b>106</b>	<b>New Paragraph</b>	<u>Primary Shopping Areas are identified at the heart of the borough's designated centres. The Council considers it necessary to prioritise investment in these areas and protect and consolidate their existing uses in order to support their vitality and viability. The policies map shows the extent of these areas, reflecting the combined areas of primary and secondary frontages as included in the previous plan. These generally represent areas that are well connected, contiguous and in predominantly retail use.</u>
<b>AM194</b>	<b>107</b>	<b>11.32</b>	Outside the designated Primary Shopping Areas there should be greater opportunities for encouraging <del>an even greater</del> diversity of uses. These areas <del>will still be important locations</del> <u>are important</u> for some types of activities requiring a town centre <del>location</del> <u>locations</u> . Accordingly, a range of uses will be supported in these locations. <del>This policy seeks</del> Policy 41 'Revitalisation, Adaptation and Regeneration in Designated Centres and Parades' <u>and</u> Policy 42 'Managing Changes of Use In and Outside Primary Shopping Areas' <u>seek</u> to encourage complementary services and facilities in all designated centres. <del>These uses will also be important in generating</del> <u>This approach seeks to generate</u> footfall and linked trips to all parts of <del>a each</del> centre. Appropriate uses include those listed under the policy, but <u>are</u> not confined to just these. Acceptable uses must be of a scale appropriate to serve the local catchment, <u>and designed in</u> accordance with Policy 47 (A) Policy 45 'Shopfronts and Signage'. <del>The acceptance</del> <u>acceptability</u> of these uses will be subject to compliance with other policies of the plan, in particular <del>that</del> in this Plan. In particular, they should not give rise to unacceptable impacts on the living and working conditions of neighbours or occupiers <del>of in the surrounding area,</del> in <u>accordance</u> <del>according</del> with Policy 59 (Amenity).
<b>AM195</b>	<b>108</b>	<b>New Paragraph</b>	<u>Policy 39 'Hierarchy of Centres' sets out the hierarchy of centres. This includes Neighbourhood Centres and Local Retail Parades. Neighbourhood Centres represent local activity hubs for retail and other town centre activities. It is necessary to protect these designated areas in order to provide accessible shopping facilities for all local residents and the creation of 15 Minute Neighbourhoods across the borough.</u>
<b>AM196</b>	<b>108</b>	<b>11.33</b>	<del>Policy 39 sets out the hierarchy of centres. This includes Neighbourhood Centres and Local Retail Parades. Neighbourhood centres represent local activity hubs for retail and other town centre activities. It is necessary to protect these designated</del>

			<p><del>areas in order to provide accessible shopping facilities for all local residents.</del> To minimise the need to travel, ideally all residential properties should be within a reasonable walking distance of a full range of essential shops. However, the Council accepts that it may not be possible to retain all shops in the borough as <del>in some situations</del> the viability of retail uses depends on many other economic factors. Where there is sufficient population to support <del>these</del> <u>retail uses however</u>, the policy seeks to safeguard <del>such units, them</del> - particularly those that are reasonably sized with adequate servicing facilities. Retention of such <del>units</del> <u>uses</u> will help to attract new retailers and therefore contribute to the provision of a good range of essential shops.</p>
<b>AM197</b>	<b>108</b>	<b>11.34</b>	<p>Local <u>Retail Parades</u> are smaller activity hubs where retail activity is more dominant. They often have a key footfall-generating <del>feature</del> <u>features</u> or retail '<u>anchor</u>' <u>anchors</u> and contain the minimum number or range of shops which the Council considers necessary to enable the centre to perform its local shopping role. The <del>need to protect</del> <u>protection of</u> these parades is <del>important</del> particularly <u>important</u> to meet day <u>-to -day</u> shopping needs. Where planning permission is required, this policy therefore seeks to generally resist proposals <del>resulting</del> <u>that would result</u> in the loss of shops within designated parades.</p>
<b>AM198</b>	<b>108</b>	<b>11.36</b>	<p>In implementing <del>the</del> <u>this</u> policy, it is accepted that there may be situations where the retention of a shop <u>or service</u> may be impossible for economic reasons or a lack of control arising from the Use <del>classes</del> <u>Classes</u> Order. This policy will <u>therefore</u> be applied flexibly - the overriding objective being to ensure that the surrounding area is not deficient in essential local shops such that residents' <del>accessibility to local parades is not seriously compromised</del> <u>ability to meet their day-to-day shopping needs is seriously compromised</u>. As a guide, <u>this may be the case</u> if they need to walk more than a 10 minute distance by foot (800m) to the nearest facility. Accordingly, the number and range of uses within the nearby local area will be an important consideration.</p>
<b>AM199</b>	<b>109</b>	<b>11.39</b>	<p>The corner shop is the old faithful of any neighbourhood. It is <del>important</del> particularly <u>important</u> for the elderly and people with disabilities who cannot easily travel <del>far</del> for top up convenience goods. <del>They are also desirable from a sustainable point of view, in that people are not dependent on car use to visit these for their day to day top up convenience shopping need.</del> Accordingly, <u>they</u> <u>Accordingly, corner shops</u> need to be protected. In managing changes of use, this policy seeks to ensure that <del>resident's</del> <u>residents'</u> access to these facilities are not compromised to the extent that they are completely lost. <del>Accordingly, in</del> <u>In</u> considering changes of use, the Council will ensure that residents in the local catchment area of the proposal can conveniently walk to other nearby shops or parades.</p>
<b>AM200</b>	<b>110</b>	<b>11.40</b>	<p>Changes of use in <del>such locations</del> <u>often</u> <u>entails</u> <u>non designated locations can often entail</u> the removal of former shopfronts and the construction of new ground floor frontages. This policy seeks to ensure that satisfactory standards are achieved in terms of how the proposed use is integrated with adjoining uses in both function and appearance.</p>
<b>AM201</b>	<b>112</b>	<b>11.45</b>	<p>Design and environmental quality issues are important to town centre vitality and viability. Shopfronts play a key part in establishing and defining the visual character of high streets and shopping parades. <del>There is continuing commercial pressure for new designs and modifications in relation</del> <u>In managing necessary changes</u> to shop fronts. <del>In managing such changes, important considerations will be,</del> the effect of alterations and changes of use on the street scene and the potential for the <u>successful</u> residential use of upper floors <u>will be important considerations</u>.</p>
<b>AM202</b>	<b>112</b>	<b>11.46</b>	<p><u>In most cases, a shop style window display</u> <u>displays</u> are necessary to protect the townscape <u>and street scene</u> of commercial/shopping areas. Window displays help to maintain the attractiveness and continuity of the shopping frontage and can provide information for users and visitors. In support of this policy, further guidance <del>will be provided through a</del> <u>Shopfront Design Guide</u> is provided in the <u>Shopfront Design Supplementary Planning Document (SPD)</u>.</p>

Chapter 12: Social and Community Infrastructure			
Ref	Page	Policy / Paragraph	Modification
AM203	115	12.1	It is important that new development in Waltham Forest is supported by appropriate social and community infrastructure. Providing and improving access to such facilities greatly improves the quality of life for residents, builds strong communities and helps to address inequalities and social exclusion. <u>It is also fundamental to the delivery of successful 15 Minute Neighbourhoods.</u>
AM204	116	12.4	<del>With the population projected to grow in Waltham Forest and to accommodate the needs of future residents, there will be a need to protect, enhance and provide new social and community facilities.</del>
AM205	116	12.5	<del>The Council will seek to protect existing facilities and will support improvements and more</del> <u>With the population projected to grow in Waltham Forest, and to meet the needs of both existing and future residents, this Plan seeks to protect and enhance existing community and social infrastructure and provide new facilities. This will include supporting improvements to existing facilities and encouraging more efficient and intensive use of existing sites. <del>Co</del>Where appropriate, co-locating multiple facilities on a single site can be an efficient way to improve both quality and accessibility.</u>
AM206	116	12.6	Where community facilities are provided, the Council will seek to secure community benefits through sharing schemes and joint user agreements <u>where suitable and appropriate</u>
AM207	116	12.7	<del>The Council's Planning Department</del> <u>Local Planning Authority</u> works closely with other <del>internal departments,</del> <u>Council services</u> such as Public Health, Highways, Waste and Parks to develop, implement and monitor the delivery of new and improved infrastructure. <del>As</del> <u>The Local Planning Authority,</u> <u>also works closely with external partners including WEL Clinical Commissioning Group<sup>(15)</sup> to plan for the future needs of the borough and the NHS North East London <sup>(16)</sup>.</u> <del>The Council will continue to work in partnership with all relevant services and organisations to ensure that new development is provided with sufficient healthcare services,</del> <u>the infrastructure that is needed is provided in the most suitable locations, at the right time. Over the lifetime of the plan it is very likely that there will be more changes in the ways that health and other public services are delivered and provided. Close partnership working will therefore be essential to ensure that communities continue to have the best possible access to the facilities they need.</u>
AM208	116	New Paragraph	<u>The Council maintains an annually updated Infrastructure Delivery Plan (IDP) to assess the types, quantities and locations of the infrastructure provision that currently exists, and what is needed to meet future needs.</u>
AM209	117	12.8	<del>Development proposals will be</del> <u>are expected to mitigate any impacts</u> <del>site specific impacts</del> <u> on local infrastructure by way of Section 106 and/or Section 278 Highways agreements, in accordance with Regulation 122 of the CIL Regulations</u> <del>legal agreements.</del> <u>The majority of planning permissions in the borough will be</u> <del>are</del> <u> also be liable for a Community Infrastructure Levy (CIL) payment towards the funding of infrastructure. The Council will also continue to work with a range of partners and organisations to prioritise and allocate the financial contributions secured from development and, where possible, use such</u>

			funds to leverage further capital and revenue investment, <del>aeressfrom</del> both the public and private <u>sources</u> , by way of match funding. Further guidance will be provided in the Developer Contributions Supplementary Planning Document (SPD).
<b>AM210</b>	<b>117</b>	<b>12.9</b>	<del>As part of making sure this happens, the Council maintains an annually updated Infrastructure Delivery Plan (IDP) to assess the types quantities and locations of the existing provision of infrastructure and to match future provision to future needs.</del>
<b>AM211</b>	<b>117</b>	<b>12.10</b>	The Council will work with all relevant stakeholders to encourage the design of flexible community facilities that can accommodate a range of needs <u>and</u> , where appropriate <del>to enable, for example community use for</del> , <u>enable wider community access - for example weekend and evening access to</u> sports facilities in schools and colleges. Additional analysis will also be undertaken to identify infrastructure needs on a more localised basis to better understand the evolving needs arising for specific groups, <u>particularly those with protected characteristics.</u>
<b>AM212</b>	<b>117</b>	<b>New Paragraph</b>	<u>Where social or community facilities could be lost, applicants will be required to provide robust evidence that the site has been marketed for at least 24 months, that the form of the marketing has been appropriate, and that, despite best endeavours, no tenant (or purchaser) interested in using the site or floorspace for a social or community use can be found.</u>
<b>AM213</b>	<b>117</b>	<b>12.11</b>	Waltham Forest is <del>experiencing rapid population growth which has a significant impact on local school place planning. The Council has ahas a</del> Statutory Duty to: <ul style="list-style-type: none"> <li>• Ensure sufficient school places - (Section 4 (1) Education Act 1996 as amended)<sup>(4617)</sup>; <u>Increase opportunities for parental choice - (Section 2 of the Education and Inspectors Act 2006<sup>(4718)</sup>, Education Act 1996 as amended);</u></li> <li>• Comply with any preference expressed by parents provided compliance with the preference would not prejudice the provision of efficient education or the efficient use of resources - (Section 86 Schools Standards and Framework Act 1998<sup>(4819)</sup>); <u>and</u></li> <li>• Ensure fair access to educational opportunity - (Education Act 1996 as amended)</li> </ul>
<b>AM214</b>	<b>117</b>	<b>12.12</b>	<del>Paragraph 94 of the National Planning Policy Framework states that</del> <u>'95 of the NPPF (2021) states that</u> 'it is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local Planning Authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should: <ol style="list-style-type: none"> <li>a. give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and,</li> <li>b. work with school's promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.' </li></ol>
<b>AM215</b>	<b>118</b>	<b>12.13</b>	<del>The Draft London Plan (2021) states that in order</del> 'to ensure there is a sufficient supply of good quality education and childcare facilities to meet demand and offer education choice, Boroughs should (1) identify and address local needs and any shortages in supply, both locally and sub-regionally, including cross-boundary issues (2) identify sites for future provision through the Local Plan process, particularly in areas with significant planned growth and/or need (3) ensure that development proposals for housing and commercial facilities incorporate suitable childcare provision and encourage nursery provision within primary schools, where there is a need'.

AM216	118	12.16	The Council Local Plan supports the exercise of the Council's statutory functions, as both Local Planning Authority and Local Education Authority, <del>will ensure that the Local Plan supports the exercise of their statutory functions, as.</del> As set out above, <del>with a view it seeks to</del> (a) <del>securing secure</del> diversity in the provision of schools, and (b) <del>increasing increase</del> opportunities for parental choice, (c) <del>the need for securing that secure</del> special educational provision is made for pupils who have special educational needs, and (d) make alternative provision for pupils at risk of exclusion or unable to attend school due to illness, <del>exclude or excluded from school for more than six days.</del>
AM217	121	12.21	The main method for calculating primary school requirements in Waltham Forest is the cohort survival method. The base information used for forecasting the number of children entering reception is the number of births within the borough and the number of children in reception classes (obtained from the January School Census for the previous year). The birth figures are provided by the Office for National Statistics (ONS). The birth data from ONS allows the historical uptake factor to be calculated and this represents the number of children born in the authority who then <del>goes go</del> on to attend schools in the Borough.
AM218	122	12.24	Secondary phase historical data is used to calculate the transfer rate from Year Six to Year Seven. A transfer rate of approximately 90% is applied to the Year Six projected rolls to calculate the projected Year Seven intake. This is based in part on a five-year average transfer. In addition, the <del>Borough have</del> borough has historically been a net exporter of pupils at Year Seven, but this trend is slowing due to our neighbouring boroughs being less able to accommodate Waltham Forest resident applications than they have received in the past. The <del>Boroughs</del> borough's projections support the expected increase in retention rate going forward.

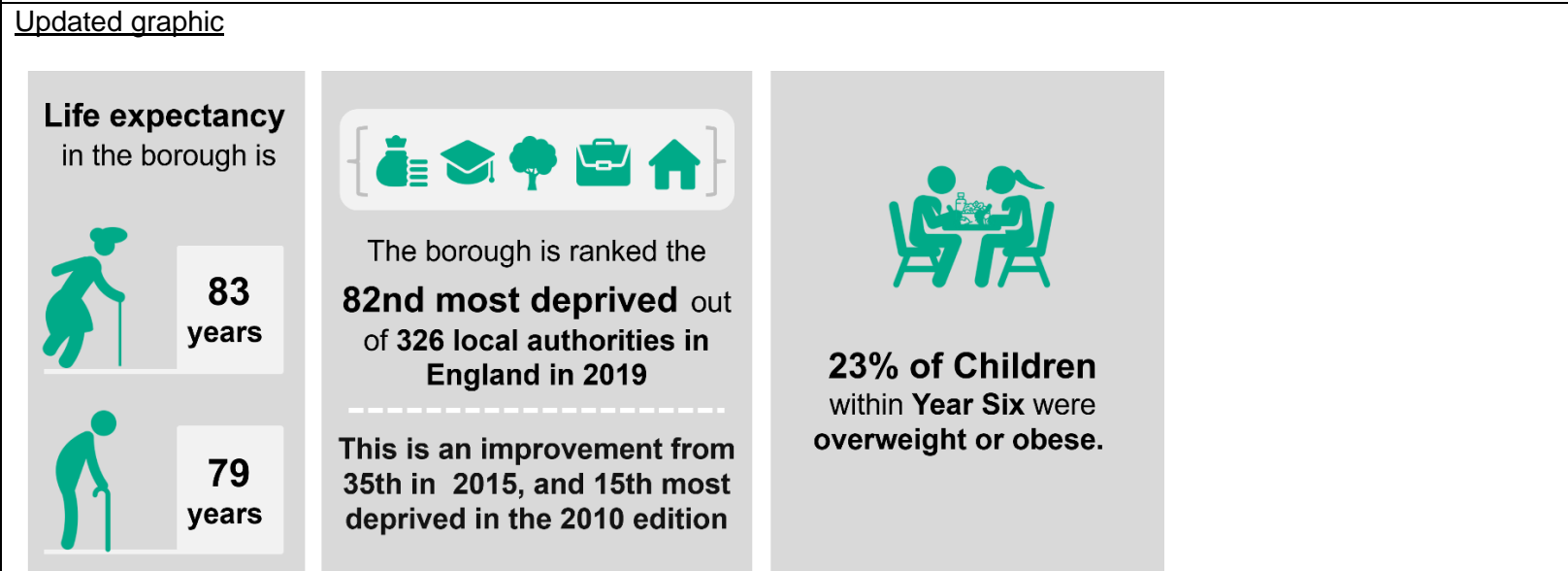
Chapter 13: Promote Health and Wellbeing			
Ref	Page	Policy / Paragraph	Modification
AM219	123	New paragraph after 13.2	<p><u>In 2022, the Council published a local report by the Marmot Institute about health inequalities affecting our residents (29). Waltham Forest were the first local authority in London to work with Professor Marmot and his team of researchers, after asking them to examine the many factors which affect the health and wellbeing of our residents, following the Covid 19 pandemic. The report closely focused on:</u></p> <p><u>Life expectancy and health outcomes;</u></p> <p><u>Factors that impact on health, like access to housing, food, education and jobs; and Residents views about the factors affecting their wellbeing, including access to health services.</u></p> <p><u>The findings highlight that life expectancy for residents in the south of Waltham Forest is up to 7 years lower than in the north. For example, Lea Bridge has the lowest life expectancy and Chapel End has the highest life expectancy. The findings from</u></p>



the report also highlights how this gap in life expectancy and health outcomes can impact on residents leading to issues which can affect their everyday lives such as how they get access to housing, jobs, food and education.

The Council is already acting on the recommendations of the report, and will publish a full action plan in 2023, working with its key delivery partners, including health services, the police, residents and community groups.

AM220 124 Figure 13.2



AM221 125 13.6

Enabling residents, workers and visitors to live active lifestyles in the borough will encourage them to make healthier choices and make the borough more sustainable. ~~Policy 56 (Delivering High-Quality Design)~~ Policy 53 'Delivering High-Quality Design' sets out principles for achieving this, in addition and with regard to the policies in the Sustainable Transport Chapter 'Active Travel, Transport & Digital Infrastructure'. Specifically, the Healthy Streets Approach introduced by Transport for London sets out how this can be achieved and should be considered along with the Council's policies on walking and cycling, cycling and train journeys.

AM222 125 13.7

Mitigation of environmental impacts such as noise and air pollution are important to ensuring people can live healthy lives. Policy 90 (Air Pollution) sets out the approach the Council expects Council's expectations to ensure better air quality and complements Policy 53 'Noise, Vibration and Light Pollution', which sets out the approach to ensuring noise does not adversely impact residents' well-being.

AM223 125 13.8

Health Impact Assessments are an important tool to ensuring ensure that the health and well-being impacts of new developments are considered. ~~Policy 51 (Health Impact Assessments) sets out when such assessments should be undertaken as these~~ Where appropriate, they can provide a comprehensive tool for ensuring how development can mitigate its adverse impacts in order to make development mitigates any potential adverse impacts and makes the most of its positive and beneficial aspects. Policy 51 'Health Impact Assessments' sets out when such assessments should be undertaken.

<b>AM224</b>	<b>125</b>	<b>13.9</b>	Ensuring people have access to social and community infrastructure is important to enable people to participate in social activities to encourage interaction and prevent isolation. Social infrastructure <del>also</del> includes access to education <del>as well as</del> <u>and</u> health facilities. Policies 48 'Social and Community Infrastructure' and Policy 49 'Education and Childcare Facilities' set out the Council's approach.
<b>AM225</b>	<b>126</b>	<b>13.10</b>	To ensure residents and visitors have access to necessary social infrastructure, large-scale developments that incorporate social infrastructure such as free drinking fountains, free public toilets, seating and shade as part of the development will be supported within the borough's <u>designated Major and District Town Centres</u> (see Policy 39 'Hierarchy of Centres'). Access to these forms of social infrastructure is a necessity for urban environments and should be freely available to meet the needs of all residents <u>of, and visitors to, the borough.</u>
<b>AM226</b>	<b>126</b>	<b>13.11</b>	Improvements and enhancements to the borough's public green and open spaces will ensure all residents and visitors have safe access to well-maintained spaces and facilities. <u>Further guidance will be provided on the creation of a connected network of green and blue infrastructure across the borough in the Green and Blue Spaces Supplementary Planning Document (SPD).</u>
<b>AM227</b>	<b>126</b>	<b>13.12</b>	Food growing <del>will</del> <u>can</u> benefit the physical and mental well-being of residents through the provision of fresh and healthy food, as well as exposure and access to the natural environment and wildlife. Policy 86 'Food Growing and <u>Allotments</u> ' sets out <del>the approach to</del> how this will be secured.
<b>AM228</b>	<b>127</b>	<b>13.13</b>	Health Impact Assessments (HIA) <del>are one of the tools that can be used to not only assess the health and well-being impacts of development, but also embed health and well-being into new developments. The Draft London Plan HIA London Plan (2021) defines Health Impact Assessments as "a systematic framework to identify the potential impacts of a development proposal, policy or plan on the health and well-being of the population and highlight any health inequalities that may arise". There are many different tools that can be used to undertake a HIA including the HUDU HIA Tool Health Impact Assessment, including the Healthy Urban Development Unit (HUDU) Health Impact Assessment tool <sup>(2932)</sup> or the Ben Cave Associates tool <sup>(3033)</sup> and the Public Health HIA Guidance. All of these and other methods and any future approaches</del> <u>Any Health Impact Assessment method will be acceptable, as long as they set out clearly the health and well-being impacts of development and the proposal, how they have or can be addressed in the design of the development, will be mitigated (where necessary) and what the benefits of the proposals will be.</u>
<b>AM229</b>	<b>127</b>	<b>13.15</b>	<del>It is widely understood that a lot of crime is opportunistic. As such, the planning process can minimise opportunities for such behaviour through the design of new developments. By taking opportunities to maximise 'natural surveillance', and making clear distinctions between public and private space, the opportunities for criminal or anti-social behaviour can be reduced. The Council's approach to this is</del>
<b>AM230</b>	<b>128</b>	<b>13.16</b>	<del>The impact of noise and vibration can be</del> <u>a material consideration in determining a planning application</u> applications. Applicants will be expected have regard for the <del>Government's</del> <u>Government's</u> Noise Policy Statement for England, <del>Intend to Publish</del> <u>London Plan Policy (2021) Policies D13 and D14 and the Mayor's Environmental Strategy <sup>(34)</sup> on ambient noise.</u>
<b>AM231</b>	<b>128</b>	<b>13.17</b>	Appropriate lighting can play a vital role in <del>enhancing</del> <u>ensuring</u> community safety <u>in the evening and at night,</u> by enhancing <u>environmental quality and opportunities for natural surveillance.</u> It can also be beneficial in terms of highlighting and enhancing landmark structures, <u>helping people navigate around the boorugh.</u> However, such benefits need to be balanced against the detrimental effects <u>excessive lighting can have on wildlife and excessive energy consumption, and as concerns about energy consumption.</u> As such national planning policy seeks to minimise light pollution from new development. In <del>areas particularly sensitive to wildlife such as</del> <u>certain circumstances, particularly ecologically sensitive areas such as Special</u>

			<u>Areas of Conservation (SAC), Sites of Special Scientific Interest (SSSI) or and Special Protection AreaAreas (SPA), it may be necessary for developers to employ a suitably qualified and accredited lighting engineer.</u>
<b>AM232</b>	<b>129</b>	<b>13.18</b>	<u>There are a significantly highis a significant number of hot food takeaways across the borough. The overconcentrationAn over-concentration of hot food takeaways and poor availability of healthier fast-food options reduces the opportunities for residents and visitors to make healthy food choices</u>
<b>AM233</b>	<b>129</b>	<b>13.19</b>	<u>The overconcentrationOver -concentration of hot food takeaways within the borough's designated town-centres, and retail parades has can also have a detrimental impact on thetheir character, vitality and function-of the shopping area. In an effort to reduce further proliferation of these uses and encourage healthier lifestyles, Policy 54 'Hot Food Takeaways' introduces restrictions to prevent new hot food takeaways will prevent the clustering of hot food takeawayscreating clusters of such uses in highly accessible areas.</u>
<b>AM234</b>	<b>129</b>	<b>13.20</b>	<u>Childhood obesity is a cause for concern inAddressing childhood obesity is an important priority for the borough. Public Health England Data shows that the prevalence of obesity amongst year 6 school students in the borough exceeds the England average. <sup>(3135)</sup> Restricting hot food takeaways within 400 metres walking distance of nurseries, primary schools, secondary schools, community colleges and youth facilities is a positive measure to manage the health implications related to rising levels of childhood obesity and help promote healthier communities.</u>
<b>AM235</b>	<b>129</b>	<b>13.21</b>	<u>Restricting hot food takeaways within 400 metres walking distance of nurseries, primary schools, secondary schools, community colleges and youth facilities is a positive measure to manage the health implications related to rising levels of childhood obesity and help promote healthier communities.</u>
<b>AM236</b>	<b>129</b>	<b>13.22</b>	<u>The borough's Healthier Catering Commitment is a voluntary scheme that seeks to help food businesses-and outlets and caterers to make healthy improvements to their food options. This includes various small actions around reducing the consumption of fat, salt and sugar and increase-increasing access to fruit and vegetables.</u>
<b>AM237</b>	<b>130</b>	<b>13.23</b>	<u>This policy considers the health and well-being implications raised by Betting Offices and Pay Day Loan Shops. Thesebetting and pay day loan shops. Both have been part of the Waltham Forest economy for a number of years. However, there have been public concerns arising from their operation and location, but in recent years, both have given rise to significant public concern - particularly in some areas of the borough. Accordingly, they need to be carefully managed. With regard to betting shops, this relates to gambling and its effects on the wider determinants of health and well-being. Research in some local areas of the UK indicates that gambling could adversely affect theResearch has shown that gambling can adversely affect determinants of health, and influence criminal activity, - for example to pay off debt or continue gambling. Therefore, whilewhilst such uses may be appropriate in supporting designated centres where they can contribute to retail diversity, it is necessary to control their location in localother more localised areas.</u>
<b>AM238</b>	<b>130</b>	<b>13.24</b>	<u>The Index of Multiple Deprivation (IMD) is the official measure of relative deprivation in England and is part of a suite of outputs that form the Indices of Deprivation (IoD). The Borough was ranked as 35th most deprived local authority in England (out of 326) in 2015 and the 7th most deprived borough in London. In applying this policy reference will be made to areas of deprivation as identified. <sup>(32)</sup> The impact of clusters of betting shops and payday loan shops is recognised by national publications, other research studies and the London Plan. Such uses have been associated with wide ranging public health consequences that disproportionately affect vulnerable groups in ways that contribute to and exacerbate existing social inequalities.</u>

AM239	130	13.25	Research evidence undertaken by the Royal Society of Public Health <sup>(3336)</sup> assessed a range of businesses for their impacts on health. It found that an increase in presence of payday loan shops on high streets is problematic when an increasing number of individuals and families are finding themselves in financial difficulty. It also found that there was a link between severe debt and poor mental health and that half of those with debt also have a mental health problem. Severe debt has also implications for increased domestic violence, food poverty, fuel poverty, increased suicide risks and strains on family relationships. Furthermore, people most likely to use payday loans are those who struggle on low incomes, low levels of savings and a lack of financial education. A report from the Office of Fair Trading identified that 60% of people taking out payday loans as 'vulnerable', with the most vulnerable groups including unemployed, single parents and older people. Other evidence from the Royal Society of Public Health <sup>(3437)</sup> also note that the impact of debt on lives is not just financial and that payday lenders have the most negative impact on mental wellbeing.
AM240	130	New Paragraph	<u>The Index of Multiple Deprivation (IMD) is the official measure of relative deprivation in England and is part of a suite of outputs that form the Indices of Deprivation (IoD). In the 2019 Index of Multiple Deprivation (IMD) Waltham Forest was ranked the 82nd most deprived borough nationally (out of 317 districts) and the 12th most deprived London borough (out of 32). In applying this policy, reference will be made to areas of deprivation as identified.</u> <sup>(38)</sup>

Chapter 14: Creating High Quality Places			
Ref	Page	Policy / Paragraph	Modification
AM241	133	14.4	Waltham Forest has a well-established, independent, expert design review process. This supports the delivery of <del>high quality places</del> <u>Exemplar Design</u> by providing tailored design advice for individual development proposals, with the aim of improving and enhancing them for the benefit of the borough and local people. Applicants will be expected to use this service at an appropriate stage in the planning process to ensure robust design scrutiny that embeds the borough's aspirations for high quality development.
AM242	133	14.5	It is important that approved <del>design</del> <u>Exemplar Design</u> quality is retained from the granting of planning permission through to completion of built schemes. This will be achieved by ensuring that sufficient design information is submitted in support of planning applications and using clearly worded planning conditions to secure quality once permission is granted. Where appropriate, the continued use of the <del>design review panel</del> <u>Design Review Panel</u> may be necessary to review amendments to an approved scheme or details submitted to discharge planning conditions. The use of legal agreements to retain the planning architect, or require a design champion or design certifier will also be considered where appropriate.
AM243	134	14.7	<del>Good</del> <u>Exemplar design and high-quality place-making</u> create environments that make active choices easy and attractive. "Active Design" <sup>(41)</sup> , published by Sport England with support from Public Health England, is a guidance document intended to help unify health, design and planning by promoting the right conditions and environments for individuals and communities to lead active and healthy lifestyles.

<b>AM244</b>	<b>136</b>	<b>14.8</b>	In the right places, and with exemplary architectural quality, <del>Taller and Tall</del> <u>and design</u> , tall buildings can make a positive contribution to the character and skyline of the borough. They can help to optimise the use of land and assist in accommodating the borough's anticipated growth over the coming years, providing new homes and economic opportunities. They can <u>also</u> help people navigate through the borough by providing reference points on the skyline and drawing attention to key destinations. <del>They can also, and they can</del> become beacons for regeneration <del>and stimulate</del> , <u>stimulating</u> further investment.
<b>AM245</b>	<b>137</b>	<b>14.9</b>	It is important to note however, that <del>Taller and Tall</del> tall buildings are not always necessary to achieve intensification and good growth. For sites or areas that are sensitive to height, lower approaches to intensification are likely to be more suitable. It is also recognised that <del>they</del> tall buildings can present a number of challenges which must be addressed and managed sensitively in the context of their immediate and wider surroundings.
<b>AM246</b>	<b>137</b>	<b>14.10</b>	The London Plan <del>suggests</del> <u>(2021) says</u> that local authorities should define what is considered to be a tall building, as this may vary in different parts of the capital and should take into account local character and context. This is an important consideration in Waltham Forest, where there are significant variations in character, townscape and sensitivity to growth and intensification.
<b>AM247</b>	<b>139</b>	<b>14.15</b>	External amenity space is an integral part of successful housing design. It is important to ensure that all new residential development <del>provides</del> <u>provides</u> an appropriate amount of external amenity space to meet the needs of residents. <del>It should be, that it is of a suitable qualitative standard and allows</del> <u>that it allows</u> for a variety of amenity space functions. <del>The provision of</del> <u>Access to high quality</u> external amenity space and play areas can have a significant positive <del>impact</del> <u>impacts</u> on people's physical and mental health and well-being. Well landscaped outdoor amenity spaces, particularly gardens, can also help reduce the urban heat island effect. For flats and maisonettes, private external amenity spaces provided in the form of balconies, terraces or gardens are often of greater value in terms of privacy and usability than communal external areas. <del>It is therefore expected that</del> <u>This Plan therefore expects a component of private external amenity spaces will</u> <u>space, meeting or exceeding the minimum standard set out in</u> Policy 58 'Residential Space Standards', <u>to contribute to external amenity space requirements wherever possible.</u>
<b>AM248</b>	<b>140</b>	<b>14.17</b>	Protecting the amenity of both existing neighbours and future occupiers is critical to delivering sustainable, <u>inclusive</u> growth across the borough. Any impacts on amenity likely to result from development proposals will be carefully assessed in relation to their associated environmental, health and social impacts, both for the immediate surroundings and the wider environment. Specific attention will be paid to potentially harmful impacts such as perceived sense of enclosure, loss of daylight and sunlight, loss of privacy, loss of outlook, overcrowding, isolation, exposure to odours, noise and vibration, <del>and</del> <u>poor</u> air quality and poorly controlled waste storage and removal. Further guidance <del>can be found in the updated Urban Design SPD (or subsequent equivalent)</del> <u>will be set out in the Exemplar Design Supplementary Planning Document (SPD)</u> . The degree of harm to amenity will always be considered on a case by case basis.
<b>AM249</b>	<b>141</b>	<b>14.18</b>	<del>A primary objective in all new development is to</del> <u>Ensuring that the borough is safe is a priority for Waltham Forest, and fundamental to the primary objective of this Plan to to</u> promote high quality places that are inclusive, <u>well</u> connected and attractive for all users. <del>However, good urban design also</del> <u>Exemplar Design</u> has an important role to play in promoting safe, active places <del>and the Council</del> <u>community safety, reducing crime and disorder and reducing the perception of crime and</u>

			<del>disorder. The Council also recognises the important and complementary role that “designing out crime”</del> <u>Designing Out Crime</u> can have in contributing to good place making.
<b>AM250</b>	<b>141</b>	<b>14.19</b>	<del>Ensuring that the borough is safe is a priority for Waltham Forest. Anti-social behaviour does not just make life unpleasant; it prevents a peaceful community life and, it degrades the environment, and it can have a big impact on resident’s</del> <u>residents’</u> mental health and wellbeing. The planning process can minimise opportunities for such behaviour through the careful design of new developments, without compromising the principles of good place making. By taking opportunities to maximise ‘natural/passive surveillance’, and making clear distinctions between public and private space, the opportunities for criminal or anti-social behaviour can be reduced. <u>In order to achieve this, proposals will be expected to incorporate guidance on ‘Designing Out Crime’.</u>
<b>AM251</b>	<b>141</b>	<b>14.20</b>	<del>The design and layout of the physical environment is key to creating safe environments and reducing crime and disorder. “Designing out crime” and designing in community safety should be core principles in planning any new development, town centres, public spaces, transport hubs and streets. Development will be expected to reflect guidance on “Designing out crime”.</del>

<b>Chapter 15: Active Travel and Digital Infrastructure</b>			
<b>Ref</b>	<b>Page</b>	<b>Policy / Paragraph</b>	<b>Modification</b>
<b>AM252</b>	<b>142</b>	<b>15.1</b>	<del>Technological and behavioural changes in the last decade have brought exciting opportunities to re-evaluate how people and goods move; - and their interaction with the urban environment. This chapter covers Sustainable Transport and Digital Infrastructure, where both of which play a fundamental role in the development of Waltham Forest and the quality of its residents’ quality of lives and health. In many cases, transport involves choices - Both connect individuals and communities, facilitate access to job opportunities and for businesses to connect goods to markets, linking into the global marketplace. There are important choices to make when it comes to transport - for example, whether to walk, cycle, take public transport or a private car. However,It is recognised that choice in many situations could be limited by personal preferences, travel conditions, environmental concerns or other local circumstances. Transport is also a driver as well as a marker of economic development. It connects individuals and communities, facilitates access to job opportunities and for businesses to connect goods to markets, linking to the global marketplace</del> <u>These choices also have important consequences for the future of the borough.</u>
<b>AM253</b>	<b>142</b>	<b>15.2</b>	<del>The</del> <u>In 2018, the Council’s Digital and Technology Strategy 2018 sets set</u> out the importance of connectivity to <u>inclusive, sustainable growth</u> in Waltham Forest. The services enabled by digital technology <del>will benefit residents through the potential for economic growth drivers and jobs in addition to delivering Council</del> <u>benefit residents in a number of ways, including access to jobs and learning opportunities and the delivery of council services</u> such as libraries and social care. The internet has created entirely new fields of commerce which did not exist <del>some years ago</del> <u>even in the recent past</u> , and its impact extends to all sectors - <u>enabling new capabilities, products and services.</u> With the advent of 5G, <del>the</del> <u>quality, speed and extent of</u>

			connectivity are important factors not just for local residential communities but also for <del>future business and businesses making economic decisions</del> , including where companies decide to expand or locate new facilities. <u>In 2023, Waltham Forest will be launching an ambitious Digital Inclusion Strategy and three-year programme to tackle the personal, structural, and financial barriers that prevent some of the borough's residents from thriving in an increasingly digital world.</u>
<b>AM254</b>	<b>143</b>	<b>15.3</b>	Waltham Forest's Transport Infrastructure Investment Strategy, Vision 2020 for Cycling, and Local Implementation Plan 3 (LIP3) (2019), set out the borough's vision for a transport network that <del>improves</del> <u>would improve</u> the quality of life of all residents, <del>and unlocks</del> <u>unlock</u> significant opportunities for <del>i n c l u s i v e</del> , <u>sustainable</u> growth.
<b>AM255</b>	<b>143</b>	<b>15.4</b>	The Council's main objective is to deliver an affordable, accessible, and future-proofed public transport network that allows residents and business to access opportunities, while creating attractive, healthy and safe neighbourhoods that share the benefits of active travel across all people that live in, or visit the borough.
<b>AM256</b>	<b>143</b>	<b>15.5</b>	<u>Building on the success of that vision, the Council's ongoing objective is to deliver an affordable, accessible, and future-proofed public transport network that allows residents and businesses to access opportunities, whilst creating attractive, healthy and safe 15 Minute neighbourhoods where the benefits of active travel are shared by all.</u> In order to achieve this, the Council will continue to work closely with the Essex County Council (ECC), Epping Forest District Council (EPDC), neighbouring boroughs <u>London Boroughs</u> , Transport for London (TfL) and other relevant public sector bodies.
<b>AM257</b>	<b>143</b>	<b>15.6</b>	Waltham Forest is committed to meeting the Mayor of London's Transport Strategy <sup>(46)</sup> objectives to deliver a transport network that improves the health and wellbeing of all Londoners, and to achieve an 80% mode share for active and sustainable travel by 2041. <u>To achieve this target, a significant shift towards walking, cycling and public transport use is needed over the next 20 years. This is encapsulated in the Council's 15-Minute Neighbourhood Corporate Strategy<sup>(47)</sup>, which presents an effective way of creating healthier, active communities and people-friendly places.</u>
<b>AM258</b>	<b>143</b>	<b>15.7</b>	<del>To achieve this target, a significant shift towards walking, cycling and public transport use is needed over the next 20 years. In order to achieve this, the Council has been working to deliver '15-minute neighbourhoods' <sup>(35)</sup> as an effective way of creating healthier, active communities, and people-friendly places.</del>
<b>AM259</b>	<b>143</b>	<b>15.8</b>	<del>This is</del> <u>The 15-Minute Neighbourhood approach is all about living locally, giving people the ability to meet most of their daily needs within a 15-minute walk, wheel or cycle from home, with safe. Safe cycling and local public transport infrastructure is integral to this.</u> Development will be expected to contribute to these aims by enhancing active and public local transport networks, <del>and minimising the need to travel through good design and location</del> <u>locating the right development in the right places.</u>
<b>AM260</b>	<b>144</b>	<b>15.9</b>	The delivery of vibrant, healthy, liveable and safe <del>neighbourhoods</del> <u>15 Minute Neighbourhoods</u> , meeting the Mayor of London's Transport Strategy aims, will increase the <del>active use of streets which is essential for the physical and mental</del> <u>physical activity and related well-being</u> . The promotion of '20-minute neighbourhoods' will increase well-being benefits and <del>physical activity benefits</del> amongst people who travel within Waltham Forest, <del>especially including the proportion of physically inactive adults in the Borough</del> <u>borough</u> (26.6%), which is higher the London average (22%) <sup>(3649)</sup> .
<b>AM261</b>	<b>145</b>	<b>15.11</b>	As set out in the Waltham Forest LIP3 (2019) <del>and the Council's Public Service Strategy (2020)</del> , the delivery of safe, active, and low traffic neighbourhoods is a proven approach to improving the health and wellbeing of communities. Drawing on the TfL's 'Healthy Streets' principles, <del>and the Mayor's 'Vision Zero' and 'London Streetspace Plan' (LSP)</del> , the Council aims to

			realise these benefits through creation of self-sufficient, attractive and safe '15-minute neighbourhoods' <u>Minute Neighbourhoods</u> for everyone. This will reduce the impact of motor traffic on air quality, climate change, congestion and road safety, and rebalance street space towards people who walk, <u>wheel</u> , cycle, and spend time in their local streets, whilst improving people's mental well-being and reducing their risk of chronic illnesses and cardiovascular disease.
<b>AM262</b>	<b>145</b>	<b>15.12</b>	<del>The Council is committed that wayfinding</del> <u>Wayfinding</u> through the 'Enjoy Waltham Forest' programme is a key tool for enabling a modal shift towards walking, cycling, <u>and using active travel to access public transport</u> ; <u>and</u> . <u>Similarly, providing real time information on services</u> . <del>New Development contributions should improve</del> <u>is a key tool to increasing access to public transport</u> . <u>New development in the borough should contribute to improving</u> the experience of walking and cycling, <u>and the improvement of wayfinding to link</u> <u>including wayfinding that links</u> key infrastructure, transport nodes, green spaces and canal towpaths where appropriate
<b>AM263</b>	<b>145</b>	<b>15.13</b>	Air pollution is associated with health issues, including respiratory conditions, heart disease and cancer affecting the most vulnerable in society, such as children and older people <sup>(37)</sup> . <del>It must be noted that in the Borough</del> <sup>(50)</sup> <u>In Waltham Forest, nearly 65% of Nitrogen Oxide (NOx) emissions come from road traffic</u> <sup>(3851)</sup> . Consistent with the Council's Climate <u>Emergency Strategy</u> <u>Action Plan</u> <sup>(52)</sup> , <del>this plan seeks to satisfy the target of a 30% further reduction in</del> <u>Plan seeks to reduce</u> road transport and achieve the National Air Quality objective of reducing NOx emissions. The air quality in terms of NOx emissions is expected to improve between 2013 – 2020 based on forecasts for 2020 (GLA, 2016) <sup>(3953)</sup> ; and new developments are expected to contribute to and enhance sustainable transport initiatives (e.g. Car Club, Electric Vehicles and Bikes), safe road crossings where needed; and high quality placemaking with seating, signage and increased tree and vegetation coverage.
<b>AM264</b>	<b>147</b>	<b>15.14</b>	As stated in the Mayor of London's 'Healthy Streets for London' report, increasing physical exercise <del>present</del> <u>is</u> an important tool <del>to in</del> <u>tackling</u> many of the borough's health challenges, including mental health disorders (affecting 22.5% of the population aged 16+) <sup>(4055)</sup> , cardiovascular disease ( <u>a common cause of death in the borough</u> ), hypertension (11% of the patients in NHS Waltham Forest Clinical Commission Group), obesity (10.5% of children in Reception, 23.4% of children in Year 6 and 52.9% of residents 18+), and diabetes (10.1% of the borough population) <sup>(4456)</sup> . While Waltham Forest enjoys a higher than average mode ( <u>across outer London</u> ) share for active travel <del>across outer London</del> , there is significant potential to increase this number, <u>and it further</u> . It is estimated by TfL that 240,700 more trips could be cycled every day in the borough, and 73,400 could be walked.
<b>AM265</b>	<b>147</b>	<b>15.16</b>	As an example of this, in recent years, <del>the Council</del> through the 'Enjoy Waltham Forest' programme, <u>the Council</u> has evidenced the importance of prioritising <del>in new developments the need of maintaining road users away from the car, where appropriate</del> . <del>Figure 15.1</del> <sup>(42)</sup> <u>road users other than private cars in new developments</u> . <sup>(57)</sup> The 2018 report entitled ' <u>Impacts of an active travel intervention with a cycling focus in a suburban context</u> ', shows the benefits <del>that</del> <u>that</u> Waltham Forest has achieved by delivering high quality infrastructure, interventions and <del>training</del> <u>training</u> , which has certainly increased residents' levels of cycling and walking. The Council <u>will seek</u> to continue these achievements by promoting active travel when assessing planning applications.
<b>AM266</b>	<b>150</b>	<b>15.18</b>	<del>Complementing the transformation of neighbourhoods, provision of</del> <u>Provision of</u> a public transport network that is fit for purpose, accessible, and future-proofed is vital to unlocking <del>future</del> <u>sustainable and inclusive growth</u> and improving the life chances of people who live and work in Waltham Forest.
<b>AM267</b>	<b>150</b>	<b>15.19</b>	While the borough has strong connections to Underground, Overground, National Rail, bus and active travel networks, significant improvements are needed to




			ensure infrastructure is able to support changing demands of residents, businesses and visitors. To support the Council's ambitious plans for regeneration and <u>inclusive growth</u> , the Council's Transport Infrastructure: Growth & Investment Strategy (2018) and LIP3 (2019) has identified a number of major rail and bus projects to improve <del>the</del> local and London-wide connectivity. In addition the borough is set to benefit from its proximity to the Elizabeth Line and, <u>in future potentially</u> , Crossrail 2 <del>which will unlock development potential in the south and the west of the borough</del>
<b>AM268</b>	<b>150</b>	<b>15.20</b>	The Council has long <u>-term</u> aspirations to reinstate the rail service referred to as the <del>Hall Farm Curve</del> <u>Meridian Line</u> and has previously campaigned for this project. This is a short stretch of track linking the Chingford to Liverpool Street route to the Coppermill Junction to Stratford line. This will meet the increasing need to connect the Borough to Stratford City, the Olympic Park and other major regeneration areas in the Lower Lea Valley. The Council will continue work with partners to develop a business case for this project.
<b>AM269</b>	<b>151</b>	<b>15.22</b>	In accordance with Policy 64 'Public Transport', new development will be expected to mitigate <del>the</del> <u>its</u> impact on local public transport services, as well as improving connectivity to areas that are under-served by public transport, in line <u>with</u> the 'Planning a Smarter, Greener Bus Network' in the Council's Transport Infrastructure: Growth & Investment Strategy (2018) and with <del>Regulation 122</del> <u>the Community Infrastructure Levy Regulations</u>
<b>AM270</b>	<b>151</b>	<b>15.23</b>	This requirement will apply for example, where there are no bus network routes or an area is <del>underserved</del> <u>under-served</u> by public transport. The objective in this case should be to improve connectivity and operation of the bus network (including bus priority works, provision of new or extended bus routes, or increasing frequency of existing services). The borough is committed to working closely with TfL and developers to unlock funding for bus services. All contributions towards new transport infrastructure will be further guided by requirements specified in <del>the</del> <u>Policy 94 'Infrastructure and Developer Contributions'</u> and the <del>S106 Planning Obligations</del> <u>Developer Contributions Supplementary Planning Document (SPD)</u> .
<b>AM271</b>	<b>154</b>	<b>15.26</b>	In Waltham Forest, while vehicle kilometres driven has reduced, the Department for Transport <del>estimate</del> <u>estimates</u> that between 2013 and 2016 there <del>has been</del> <u>was</u> an increase of 23% in LCVs and HGVs, which make up 20% on traffic on these roads. The borough is committed to working with developers and TfL to reduce the levels and impact of construction, servicing and delivery freight, utilising best practice guidance, such as in the TfL Freight and Servicing Action Plan
<b>AM272</b>	<b>155</b>	<b>15.28</b>	This policy applies to all development. However, the Council accepts that judgement on a case by case is also required to whether a development proposal will generate a significant impact on the road network. Where appropriate, detailed CLPs will be required prior to commencement of <del>the development. This will be required at sites that will or have the potential to impact on the highway network public transport services, sustainable transport, have difficult access, may affect nearby developments or surrounding residents.</del> <u>development. All applications should apply and adhere to the CLP guidance at <a href="#">Construction Logistics</a> and <del>template</del> <u>use templates</u> provided by the Council and TfL websites</u>
<b>AM273</b>	<b>155</b>	<b>15.29</b>	CLPs are a key tool in managing the environmental and safety impact of freight and deliveries to construction sites. When applied, <del>this will enable</del> <u>they enable</u> the reduction of the volume and risk of construction movements, consolidation of vehicle movements, <del>re-timing</del> <u>re-timing</u> of deliveries out of peak hours, <del>avoid</del> <u>avoidance</u> of areas and times with high levels of vulnerable road users <del>shift</del> , <u>the shifting of</u> road based deliveries towards other modes such as rail and water based modes and <del>coordinate</del> <u>the coordination of</u> activities between nearby sites.

<b>AM274</b>	<b>155</b>	<b>15.30</b>	In addition to reducing the environmental impacts of construction, effective application of CLPs delivers wider benefits to applicants by enabling reduced costs through efficient, well-planned working practices and the reduction in the frequency and volume of deliveries. The use of logistics and consolidation centres provide wider benefits, including reduced risk of theft of materials on-site, consolidation of vehicle movements, a more secure supply chain, and shared waste management.
<b>AM275</b>	<b>156</b>	<b>15.31</b>	<p>A CLP will be expected for most development sites where new building work is taking place. The CLP requirements depend on the potential impact of the site on the highway, as viewed by <u>the Council's Highways department</u>, which will determine the level of impact. The impacts are considered in terms of location, size, number of construction vehicle trips, temporary highways arrangements, access, and other factors (see table below). Detailed CLPs will be required from sites that are deemed to have the potential to detrimentally impact the highway network, road safety, congestion, or the environment through construction access. This includes sites that:</p> <ul style="list-style-type: none"> <li>• Will generate high levels of construction traffic to the site;</li> <li>• Will impact local and regional road capacity and congestion throughout the construction stages; and</li> <li>• <del>Increase</del><u>Will increase</u> the cumulative impact of construction traffic or movements within the local area.</li> </ul>
<b>AM276</b>	<b>156</b>	<b>15.32</b>	In locations with high levels of development, area-wide CLPs will be developed by the Council. Development within areas covered by <del>Area</del> area-wide CLPs will be expected to adhere to these plans by developing site specific CLPs that conform the <del>Area</del> area-wide CLP, and where appropriate, <del>contribute</del> <u>contributing</u> to their development and monitoring. S106 <del>requests will be made to enable</del> legal agreements will secure appropriate monitoring of approved <del>CLP's</del> <u>CLPs</u> during the construction period, to ensure that development sites are using the agreed vehicle routes and Planned Measures.
<b>AM277</b>	<b>158</b>	<b>15.33</b>	As outlined in <del>the</del> TfL's 'Healthy Streets for London' Report, car ownership is a key determinant of transport choice and car use across London. Effective management is essential to reducing private car travel, and realising the health and wellbeing benefits of improved air quality, decreased noise disturbance and local congestion, and increased physical activity. The car parking standards (included in Appendix 1) are intended to assist in achieving, by 2041, <del>the Mayor's aim</del> target of 80% of trips <u>being</u> made by sustainable transport modes, <del>reduce</del> <u>reducing</u> the level of car use and ownership by 12% <del>and increase,</del> <u>increasing</u> the level of sustainable transport modes by 55%; <del>and reduce the,</del> and <u>reducing</u> CO2 emissions.
<b>AM278</b>	<b>158</b>	<b>15.34</b>	In line with the Mayor's target above, which are also part of Council's 'Transport Infrastructure: Growth & Investment Strategy' (2018) and 'LIP3' (2019); <del>and taking into consideration the Ultra-Low Emission Zone (ULEZ) expected to be extended by 2021</del> <u>expanding across all London boroughs from 29 August 2023</u> , Waltham Forest is committed to accelerating the London-wide trends towards car-free and low-car development, <del>and have set.</del> <u>The</u> maximum car parking standards <u>are set</u> to reflect this.
<b>AM279</b>	<b>158</b>	<b>15.35</b>	The Council has <del>been</del> <u>an excellent track record</u> of promoting sustainable transport and active travel modes across the borough <del>and</del> especially where <del>development</del> <u>developments</u> are well connected to public transport, active travel networks, and local amenities. <del>Between 2016 and 2018, 48 car-free developments in Waltham Forest were secured through Section 106 agreements, delivering an average parking ratio of 0.1 spaces per unit across 3,043 new homes.</del> This follows an upwards shift in people travelling by foot, bicycle and public transport in Waltham Forest, and a five per cent reduction in the number of car kilometres driven on borough roads since 2016 (the third highest decrease across all boroughs).

<b>AM280</b>	<b>158</b>	<b>15.36</b>	The Council recognises that less-well connected areas may require some levels of car parking within new developments, and this will be reflected within robust assessments of relevant local factors including potential public transport provision. <del>The TfL's PTALs</del> <u>TfL's PTALs</u> and <del>existing borough's CPZs</del> <u>the distribution of existing CPZs in the borough</u> show that the North of the Borough <del>have</del> <u>has</u> a lower accessibility level to public transport, and a higher car dependence, where between 0%-37.5% <sup>(4560)</sup> of the population do not have access to a car, compared with the South and Central Area with a 50%-75%.
<b>AM281</b>	<b>159</b>	<b>15.37</b>	Car clubs <del>also provide</del> <u>play</u> an important role in supporting people to transition away from car ownership, especially when paired <u>with</u> wider incentives, such as management of residential parking, improvements in public transport, and new cycling and walking facilities. <del>It is shown</del> <u>Evidence provided</u> by CarPlus, <del>which shows that</del> <u>car club members are more likely to walk, cycle or take public transport, and that 28% of car club members based in London have reduced the number of vehicles owned by their household since joining a car club.</u>
<b>AM282</b>	<b>162</b>	<b>15.51</b>	As set out in the <del>Draft New</del> <u>Adopted</u> London Plan to achieve greater digital connectivity than set out in part R1 of the building regulations <sup>(4863)</sup> new development should seek to: a) safeguard existing communications infrastructure, or where a significant adverse impact has been identified, prepare an impact statement and implement a mitigation plan as necessary through a Section 106 agreement prior to occupation of the proposed development, especially in relation to mobile connectivity b) co-locate services where possible on existing structures, such as masts, or within appropriate street furniture, such as street lighting, to ensure the effective use of public realm to accommodate well-designed and located mobile digital infrastructure that mitigates the impact of new infrastructure on the existing built environment C) ensure that sufficient ducting space is provided for future digital connectivity infrastructure.
<b>AM283</b>	<b>164</b>	<b>15.58</b>	The main tools the Council has in delivering the policies in this section of the Plan are through: <ul style="list-style-type: none"> <li>• <u>The Infrastructure Delivery Plan (IDP) and Infrastructure Delivery Schedule; Masterplans;</u></li> <li>• <u>Developer Contributions Supplementary Planning Document (SPD);</u></li> <li>• <del>Planning Obligations SPD and Section 106 contributions.</del> <u>agreements and contributions; Community Infrastructure Levy;</u></li> <li>• <del>Planning</del> <u>The planning application process;</u></li> <li>• <u>The Council's role as Local Highway Authority; and The Council's role as Lead Local Flood Authority</u></li> </ul>

<b>Chapter 16: Enhancing and Preserving our heritage</b>			
<b>Ref</b>	<b>Page</b>	<b>Policy / Paragraph</b>	<b>Modification</b>
<b>AM284</b>	<b>165</b>	<b>16.1</b>	Waltham Forest has a rich multi-layered historic environment that contributes significantly to the distinctive and unique identity of the borough. This adds to the quality of life and well-being <del>to</del> <u>of</u> all who study, live, work or visit the borough.

AM285	165	16.2	Whether in the form of individual listed buildings, conservation areas or other heritage assets such as <del>parks, gardens and landscapes, or</del> below-ground archaeology; <u>protecting and enhancing this our heritage</u> is an important aspect of the role the Council plays on behalf of the community in fulfilling the government's key planning principles, as set out in the National Planning Policy Framework (NPPF).
AM286	165	Figure 16.1	<p>Updated graphic</p>  <p>117 statutory Listed Buildings</p> <p>15 Conservation Areas</p> <p>171 entries on the Local List</p> <p>1 Area of Special Character</p> <p>21 Archaeological Priority Areas</p> <p>5 Parks and Gardens of Local Historic Interest</p>
AM287	165	16.3	<p>The Council has a positive strategy for the conservation , <u>enhancement</u> and enjoyment of the historic environment that includes;</p> <ul style="list-style-type: none"> <li>• Guidance and advice for owners and developers in relation to the historic environment and how its assets should be conserved.</li> <li>• Identifying and managing heritage assets at risk through neglect, decay or other threats, and seeking their return to appropriate and sustainable use.</li> <li>• A continuing programme producing and reviewing Conservation Area appraisals, management plans and <u>periodically</u> updating the Archaeological Priority <del>Zones</del><u>Areas</u>. Continuing to work closely with heritage organisations such as Historic England, national and local amenity societies and other relevant stakeholders in considering proposals affecting heritage assets within the borough, and in promoting and raising awareness of local heritage matters generally.</li> </ul>

			<ul style="list-style-type: none"> <li>Support for local communities in promoting, valuing and identifying other locally significant <del>historic buildings and heritage assets</del> within the borough, including producing a <u>list of Local Heritage ListAssets.</u></li> </ul>
AM288	166	16.4	<p>The <del>protection</del><u>conservation and enhancement</u> of heritage assets is a key consideration in assessing development proposals, and all development will be required to protect the significance, character, appearance and setting of heritage assets, whether <del>nationally</del> designated or non-designated, so that they are sustained for the benefit of existing and future generations. <del>This</del><u>In the context of Waltham Forest this is particularly important when considering non-nationally-designated heritage assets, due to the limited number of designated heritage assets within the borough</u></p>
AM289	167	New Paragraph after Policy 72	<p><del>Designated Heritage Assets: Conservation Areas; Statutorily Listed Buildings; and</del> <b>Designated Heritage Assets:</b> World Heritage Site, Scheduled Monument, Listed Building, registered park and garden, registered battlefield, conservation area <u>designated under the relevant legislation, and Non-Designated Assets that are</u> Asset of archaeological interest if <del>it</del><u>that</u> holds, or potentially holds, evidence of past human activity, <u>worthy of expert investigation at some point whether inside or outside of Archaeological Priority Zones</u><u>Areas.</u></p> <p><del>Non-designated Heritage assets</del><b>Non-designated Heritage assets:</b> Locally Listed buildings<u>Heritage Assets;</u> Parks and Gardens of Local Historic Interest; <del>and the Highams Area</del><u>Areas</u> of Special Character.</p>
AM290	167	16.5	<p>National planning policy places a strong emphasis on the conservation of heritage assets appropriate to their significance. <del>Designated Historic Assets with more significance have a greater</del> <u>The greater the significance of a Designated Heritage Asset, the greater the</u> presumption in favour of its conservation. This is irrespective of the degree of any potential harm that may be caused by a development proposal.</p>
AM291	167	16.6	<p>The Council will look favourably on proposals that creatively and sensitively reuse and adapt heritage assets, especially those currently not in use or which are on the Heritage At Risk Register. <u>The Council recognises that in many cases the best use of a heritage asset will be the original use for which it was designed, and will support retention and reintroduction of these uses where possible.</u></p>
AM292	167	16.7	<p>Not all of Waltham Forest's heritage is designated, and it is therefore important to recognise the value of our <del>undesigned</del> <u>non-designated</u> historic environment in planning for the future. Many buildings are of significance to the local environment, even though they may not be protected by law. <u>Therefore, a balanced judgement considering the scale of harm and the significance of the asset in question is required for development proposals affecting non-designated heritage assets.</u></p>
AM293	167	16.8	<p>In addition to the need to identify and assess the particular significance of any heritage asset that may be affected by a proposal, it is also essential to consider the impact of proposed development on the setting of such assets. The significance of a heritage asset derives not only from its physical presence and historic fabric but also from its setting – the surroundings in which it is experienced.</p>
AM294	167	16.9	<p>Historic England's Setting of Heritage Assets provides clear guidance on <del>settings</del><u>setting</u> which the Council will take into account in the consideration of development proposals, and which applicants are strongly advised to refer to in bringing forward relevant schemes.</p>

<b>AM295</b>	<b>170</b>	<b>16.11</b>	The <del>borough</del> <u>Borough</u> has a diverse range of listed buildings, from the late medieval Walnut Tree House in Leyton, <del>erto</del> the civic grandeur of Walthamstow Town Hall, to the distinctive Moorish design of the former Granada Cinema. However, in numerical terms, they represent a finite asset and for that reason their loss/substantial demolition will not be permitted unless the Council is satisfied that every possible alternative approach for restoration, conversion or re-use has been thoroughly explored and found to be impracticable.
<b>AM296</b>	<b>170</b>	<b>16.12</b>	Section 7 of the <del>Act</del> <u>Planning (Listed Buildings and Conservation Areas) Act 1990</u> states that prior consent must be obtained from the local authority before any demolition (in whole or in part), alteration or extension works go ahead which would affect the character of a building of special architectural or historic interest. It is a criminal offence to carry out any such works without consent.
<b>AM297</b>	<b>170</b>	<b>16.13</b>	<del>Together with Historic England the Council maintains</del> The Council supports Historic England in maintaining a Heritage at Risk Register, highlighting statutorily listed buildings that are assessed to be at risk for a variety of reasons, be that vacancy, deterioration of fabric, or poor structural condition. <del>The Heritage at Risk Register is a fluid document which changes each year, but at present there are 15 sites on the register, including several churches, a cinema, a water pumping station, and residential Georgian properties.</del>
<b>AM298</b>	<b>170</b>	<b>16.14</b>	The purpose of the register is to monitor and provide the basis for solutions to the issues these buildings face, and the Council will therefore work with <del>owners</del> <u>stakeholders</u> to facilitate the successful refurbishment and repair of these assets, with the long-term objective of putting them back into viable and sustainable uses.
<b>AM299</b>	<b>170</b>	<b>16.15</b>	Appropriate temporary uses will also be considered that could prevent further decay of the asset, provide improved security and/or allow an increased prospect of sustainable re-use. The Council may also be able to offer assistance and advice on external grant <del>_giving</del> bodies.
<b>AM300</b>	<b>170</b>	<b>16.16</b>	The most viable use for a heritage asset may not be the use for which it was originally intended, and proposals that bring 'At Risk' buildings back into sustainable uses that maintain and enhance the buildings significance will be looked on favourably.
<b>AM301</b>	<b>171</b>	<b>16.17</b>	Complementary to its aim of improving the environment of the borough as a whole, the Council seeks to conserve, and, wherever possible, enhance those buildings and areas which are of special value. This can be achieved by designating <del>Conservation Areas</del> <u>conservation areas</u> , recognising special character and historic significance of wider areas beyond that of individual buildings or structures. To date <del>14</del> , <u>fifteen</u> such areas have been designated <u>in the borough</u> .
<b>AM302</b>	<b>171</b>	<b>16.18</b>	The borough's <del>Conservation Areas</del> <u>conservation areas</u> vary in character, and include the well-preserved medieval heart of Walthamstow Village, the cohesiveness of the Warner housing developments in Lloyd Park and Leucha Road, and the town centres of Leyton and Chingford, amongst others.
<b>AM303</b>	<b>171</b>	<b>16.21</b>	The Council currently has Article 4 Directions in place for nine of its <del>fourteen</del> <u>fifteen</u> <del>Conservation Areas</del> <u>conservation areas</u> . The use of Article 4 Directions is in recognition of the harm that can often be caused <u>under Permitted Development</u> , to character and appearance by inappropriate changes such as the replacement of traditional timber windows and doors with modern plastic alternatives, <u>the replacement of</u> natural roofing materials such as clay and slate tiles with concrete and plastic tiles, poorly located satellite dishes, removal of original chimney stacks and changes to front gardens with hardstanding for vehicles
<b>AM304</b>	<b>172</b>	<b>16.22</b>	The Council will therefore use <del>this mechanism to ensure good management of Conservation Areas by encouraging appropriate changes to residential properties so as to preserve or enhance the character of the Conservation Area</del> <u>Article 4 Directions to protect the local amenity of conservation areas, by requiring planning applications be submitted for certain</u>

			<del>works.</del> When considering changes to properties within a <del>Conservation Area</del> <u>conservation area</u> , applicants are advised to contact the Council's Conservation Officer for further specialist advice.
<b>AM305</b>	<b>172</b>	<b>16.23</b>	The history of Waltham Forest dates from the time of the earliest Bronze Age settlements in the Forest. Archaeology is an important way in which greater knowledge about the history of the borough can be discovered. The evaluation and assessment of archaeological remains should take place before the point of <del>application,</del> <u>making a planning application.</u> However, it is recognised that the opportunity to carry out archaeological investigations often only arises when construction work begins
<b>AM306</b>	<b>172</b>	<b>16.24</b>	The Greater London Archaeology Advisory Service (GLAAS), part of Historic England, provides archaeological advice to local authorities, developers and their agents, and local people. They maintain the Greater London Historic Environment Record (formerly the Greater London Sites and Monuments Record) and have defined 21 Archaeological Priority <del>Zones</del> <u>Areas (APAs)</u> in the borough for their particular archaeological interest. The Council is committed to consulting GLAAS on all relevant applications and schemes that will impact non-designated assets of archaeological interest and sites that fall within Archaeological Priority <del>Zones</del> <u>Areas</u> under the criteria set out in <del>paragraph 16.25</del> <u>below.</u>
<b>AM307</b>	<b>173</b>	<b>16.25</b>	<del>Enlisting the</del> <u>The expert advice of GLAAS in line with the guidelines below and providing information as set out below for desk based assessments will potentially facilitate open trench investigations prior to development taking place; will be sought in relation to:</u> <ul style="list-style-type: none"> <li>• All major planning applications over 0.5 hectares whether in an <del>APZ</del> <u>APA</u> or not;</li> <li>• All Environmental Impact Assessment Scoping requests and Environmental Statements;</li> <li>• Any application supported by an archaeological desk-based assessment;</li> <li>• Minor planning applications in any APA (tiers 1 to 3);</li> <li>• Any domestic basement applications in APA tiers 1 and 2 only;</li> <li>• Householder and equivalent-scale very minor applications in APA tier 1 only; Proposed substantial demolition or major alterations to historic buildings; Submission of details in relation to archaeological conditions; <u>and</u></li> <li>• Appeals on applications for which an archaeological issue has previously been identified</li> </ul>
<b>AM308</b>	<b>174</b>	<b>16.27</b>	The Council maintains a list of <del>buildings, gardens and landscapes of local</del> <u>locally listed heritage assets</u> of architectural and historic interest separate to those on the Secretary of State's statutory list for the borough. The list will be reviewed and updated periodically. These are not subject to additional statutory controls, but the Council will encourage their <del>preservation</del> <u>conservation</u> through its normal town planning controls, with a firm preference for their retention <u>and enhancement</u> as part of development.
<b>AM309</b>	<b>174</b>	<b>16. 28</b>	Due to the limited number of statutory listed buildings within the borough, locally listed <del>buildings, gardens and landscapes</del> <u>heritage assets</u> are considered to take on a greater significance than might be found elsewhere. As a result, the council will be preparing <del>an SPD document</del> <u>a revised and updated Local List document and supporting SPD</u> to provide greater clarity on <del>preserving</del> <u>conserving, enhancing and managing locally listed buildings gardens and landscapes</u> <u>heritage assets.</u>
<b>AM310</b>	<b>174</b>	<b>New Paragraph after Policy 78</b>	The Highams Area of Special Character was designated by the Council in 1988 in recognition of the area's cohesive <u>architectural and landscape quality. Its interest lies in its historical relationship with the Warner family, who developed a number of residential areas within the Borough from the late nineteenth century onwards and was one their last major projects to complete.</u>

<b>AM311</b>	<b>174</b>	<b>New Paragraph</b>	<u>Built on a much more suburban scale compared to their other developments, the Highams Estate adopted an Arts and Crafts idiom, with a number of 'standard designs' used for properties. Key features include use of brick at ground floor and roughcast render at first floor, timber panelled front doors, red and brown clay roof tiles, and planted front gardens.</u>
<b>AM312</b>	<b>174</b>	<b>16.29</b>	<del>The Highams Area of Special Character was designated by the Council in 1988 in recognition of the area's cohesive architectural and landscape quality. Although not deemed to be of sufficient interest to be merited with conservation area designation, and not therefore being a statutory consideration within the planning process, the Council seeks where applications are submitted within the estate, the Council will seek to ensure the area's special interest is protected. The Council has made an Article 4 Direction to ensure elements of the character of the estate are preserved and enhanced through the planning process, including those material qualities outlined above and in the Highams Area of Special Character Information Leaflet, available on the council's website.</del>

**Chapter 17: Protecting and enhancing the environment**

<b>Ref</b>	<b>Page</b>	<b>Policy / Paragraph</b>	<b>Modification</b>
<b>AM313</b>	<b>175</b>	<b>17.1</b>	The borough has an extensive resource of accessible green and blue infrastructure which includes ponds, parks, wetlands, reservoirs, rivers, ditches and streams; forest, lakes and open spaces. Waltham Forest is host to <del>€</del> <u>six</u> areas of Metropolitan Open Land, <del>€</del> <u>three</u> Sites of Metropolitan Importance to Nature Conservation, 10 Sites of Borough Importance to Nature Conservation, 14 Sites of Local Importance to Nature Conservation, 4 Sites of Special Scientific Interest, 1 Local Nature Reserve, Epping Forest and the Lee Valley Regional Park. The Lee Valley Special Protection Area (SPA) and RAMSAR site (21) lies along the western edge of the Borough and the Epping Forest Special Area of Conservation (SAC) lies to the east.
<b>AM314</b>	<b>175</b>	<b>17.2</b>	From Epping Forest at the north and eastern sides of the Borough and the Walthamstow Wetlands and Lee Valley Regional Park to the south and the west, Waltham Forest is one of the greenest London Boroughs. <del>This plan seeks to maximize the valuable benefits of the borough's parks and open spaces as places which</del> <u>The borough's natural green spaces in Epping Forest and the Lee Valley Regional Park are augmented by parks. The Council's Open Space Needs Assessment (2018)<sup>(65)</sup> identifies seven Premier Parks in the borough:</u> <ul style="list-style-type: none"> <li>• <del>provide opportunities for healthy recreation</del></li> <li>• <del>are richly biodiverse environments and places to visit and experience nature</del></li> <li>• <del>create the setting for highly quality cultural neighbourhoods, linking development and greenspace</del></li> <li>• <del>increase the resilience of the borough's built environment to climate change and flooding</del></li> </ul>



AM315	175	17.3	<p>The borough's natural green spaces in Epping Forest and the Lee Valley Regional Park are augmented by parks. The Council's Open Space Needs Assessment (2018) identifies seven Premier Parks in the borough:</p> <p>Abbotts Park;  Coronation gardensGardens;  Langthorne Park;  Lloyd &amp; Aveling Park;  Memorial Park; Ridgeway Park; and  Leyton Jubilee Park (which has recently been expanded by the new sports facilities and parkland at Ive Farm).</p>
AM316	176	17.4	<p>The premier parksPremier Parks are supplemented by a network of smaller, less formally - managed parks throughout the borough, such as Sidmouth Park in Leyton, which provide opportunities for activities such as dog walking and play for children. Further details of these parks can be found on the Policies Map.</p>
AM317	176	17.5	<p>The borough also includes blue spaces and water bodies in the form of main rivers (including the River Ching, Dagenham Brook, the Lee, the Lee Navigation and the Lee Flood Relief Channel) in addition to reservoirs in Chingford and Walthamstow, and the Waterworks attraction on Lea Bridge Road. These are connected to leisure and boating activities in the wider Lee Valley Regional Park on the River LeaLee and its Navigation.</p>
AM318	176	17.6	<p>The land area of Waltham Forest covers approximately 3,881 hectares. Cumulatively Green Belt and MOL account for approximately 27% of the borough's land area. The NPPF (Para 134) sets out2021) (paragraphs 137 and 138) sets out the important functions that the Green Belt has in assisting urban regeneration by encouraging the recycling of derelict and other urban land by preventing encroachment and urban sprawl through inappropriate development. Whilst Metropolitan Open Land (MOL) has a similar degree of protection as strategic open land, its protection derives from the London Plan and its purpose is to provide open breaks in the urban area in order to maintain the structure of London.</p>
AM319	176	New Paragraph after 17.6	<p><u>This Plan seeks to maximize the valuable benefits of the borough's green and blue spaces as places which:</u></p> <ul style="list-style-type: none"> <li>• <u>Provide opportunities for healthy recreation;</u></li> <li>• <u>Are richly biodiverse environments and places to visit and experience nature;</u></li> <li>• <u>Create the setting for highly quality, cultural, 15 Minute Neighbourhoods, linking development and greenspace;</u></li> <li>• <u>Increase the resilience of the borough's built environment to climate change and flooding.</u></li> </ul>
AM320	176	17.7	<p>Overall, the borough's green and blue spaces are vital assets within the urban fabric which further the physical and mental health and wellbeing of the borough's residents and which makes up so much of the character of the borough. As such <del>it</del>they is to be protected and enhanced by the policies in this plan.</p>

<b>AM321</b>	<b>178</b>	<b>17.8</b>	Green infrastructure is defined in the NPPF (2021) as: " <u>A network of multi-functional green space and blue spaces and other natural features</u> , urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity". Green infrastructure is complemented by blue infrastructure which comprises the borough's large scale waterbodies such as the reservoirs and the Walthamstow Wetlands.
<b>AM322</b>	<b>178</b>	<b>17.10</b>	Delivery of green infrastructure may involve measures such as the planned retention and provision of high quality trees and the use of natural and green landscaping in new development through to the delivery of park and open space improvements to maximise the potential for residents to meet and interact. As such, <del>this approach</del> it will deliver benefits for all in the form of accessibility and connectivity across the borough. <u>Further guidance will be provided in the Green and Blue Spaces Supplementary Planning Document (SPD).</u>
<b>AM323</b>	<b>178</b>	<b>17.11</b>	Integral <del>into</del> this is Green Belt and Metropolitan Open Land (MOL). Chapter 13 of the NPPF (2021) sets out the fundamental aims of Green Belt policy and the framework for its protection from urban sprawl. In a London context, these apply equally to MOL which provides strategic open land within the urban area. <del>Together,</del> <u>In addition to Sites of Importance to Nature Conservation (SINC) Local Green Space (LGS) and statutory sites (Sites of Special Scientific Interest (SSSI), Special Protection Areas (SPA) and Special Areas of Conservation (SAC)),</u> Green Belt and MOL provide some of Waltham Forest's most important natural resources, <del>making.</del> <u>Together these make a</u> valuable contribution to the London-wide green infrastructure network. <del>Accordingly the Council seeks to accord such land the highest level of protection in line with national and regional policy. Improvements to its quality and accessibility are therefore encouraged.</del>
<b>AM324</b>	<b>179</b>	<b>17.13</b>	Effective maintenance is essential where open spaces and landscape infrastructure is provided, and development which benefits from <del>its</del> proximity to public open space should contribute to its ongoing maintenance. Where new open space is provided on-site as part of new developments, its design, integration with existing development and ongoing maintenance should be carefully considered at an early stage to ensure maximum benefits <u>are delivered</u> and unnecessary delays to provision are avoided.
<b>AM325</b>	<b>179</b>	<b>17.14</b>	<del>It is</del> <u>Green corridors and networks of green islands deliver benefits in supporting biodiversity and mitigating against the impacts of climate change and pollution. Richness and diversity in bird and bat populations in urban areas is strongly affected by tree numbers and distribution. It is therefore vital to protect and strengthen the network of Green Corridors in the Borough</u> <del>borough</del> and to support measures to improve the links to Green Corridors in neighbouring <del>Boroughs and Districts</del> boroughs and districts. This can be done through landscaping and the careful siting and design of buildings. <del>Green corridors and a network of green islands deliver benefits in supporting biodiversity and mitigating against the impacts of climate change and pollution. Richness and diversity in bird and bat populations in urban areas is strongly affected by tree numbers and distribution.</del> Establishing corridors and links with suitable native trees would improve the environment for local people significantly and help to "buffer" and support Epping Forest's biodiversity <del>and,</del> <u>thus</u> adding to the natural capital assets of London.
<b>AM326</b>	<b>182</b>	<b>17.17</b>	Access to high quality sports facilities, both outdoor playing fields and pitches, and indoor sports halls and swimming pools are important in developing and maintaining healthy communities. The Playing Pitch Strategy <sup>(6069)</sup> acknowledging the projected rise in the borough's population over the plan period, recommends improvement to outdoor sports facilities

			such as improvements to pitch quality, security, floodlighting and better changing facilities. However, the borough faces a shortfall in built facilities such as swimming pools and sports halls as acknowledged by Sport England studies in the borough. <sup>(5470)</sup>
<b>AM327</b>	<b>183</b>	<b>17.18</b>	In line with London Plan (2021) Policy S5, the co-location of sports facilities particularly within new and existing schools, colleges, commercial schemes and community centres should be considered positively in planning applications for mixed use development. This will help ensure the right mix of facilities in the right places to stimulate and to meet sporting demand and increase participation.
<b>AM328</b>	<b>186</b>	<b>17.19</b>	Waltham Forest has many spaces of biodiversity significance. These require a high level of protection, enhancement and management, and the Council works closely with bodies such as neighbouring authorities, Natural England and the Conservators of Epping Forest in this regard. Because of their overall importance, potential impacts from development proposals have to be rigorously assessed. Ecological assessments must be developed from the earliest stages of the pre-application process and should demonstrate as a minimum how the resource will be retained, enhanced and if necessary restored. This is particularly relevant in order to establish and improve links between areas of nature conservation importance, for instance, between Epping Forest and other wooded areas (e.g. Larks Wood) in the Borough. Accordingly development is expected to provide biodiversity benefits in accordance with the principle of net gain set out in the Draft London Plan and as set out in the Planning Obligations SPD; London Plan (2021). Further guidance will be provided in the Green and Blue Spaces and Developer Contributions Supplementary Planning Documents (SPDs).
<b>AM329</b>	<b>186</b>	<b>17.20</b>	Protected species and priority species of plants and animals are defined in the Waltham Forest, Lee Valley, London and UK Biodiversity Action Plans (BAPS). Sites of importance for their biodiversity value are mainly in Epping Forest and the Lee Valley and these important biodiversity and green infrastructure assets are the foundation for future enhancements to the borough's green infrastructure.
<b>AM330</b>	<b>186</b>	<b>17.21</b>	The highest level of protection is accorded to Ramsar sites, Special Protection Areas (SPA), Special Areas for Conservation (SAC) and Sites of Special Scientific Interest (SSSIs) in the borough. There is a statutory requirement to consult Natural England in cases where development may affect these sites. Sites of Metropolitan, Borough or Local Importance for Nature Conservation and Green Corridors are also priorities for protection, enhancement and management. Consequently, proposals which either alone or in combination are likely to have an adverse impact on any internationally designated wildlife site, have to <u>must</u> be assessed to make sure they satisfy the requirements of the Conservation of Habitats and Species Regulations. These are the Regulations which determine site specific impacts to avoid or mitigate against impacts identified.
<b>AM331</b>	<b>186</b>	<b>17.22</b>	Where planning permission is granted, planning conditions will ensure that appropriate measures are taken to protect and enhance biodiversity where it may be impacted by development. Measures to recover or relocate habitats should only be a last resort with a preference for the protection, <u>and</u> enhancement of existing habitats <u>on site</u> wherever possible <u>and</u> . <u>Proposals</u> must accommodate the mitigation hierarchy set out in London Plan (2021) Policy G6, and demonstrate biodiversity net gain using the Natural England Biodiversity metric (or agreed equivalent) in order to promote wider environmental net gain. The principle of biodiversity net gain requires developers to ensure habitats for wildlife are enhanced and left in a measurably better state than they were pre-development. The start of the process is a robust assessment of the existing habitat typology and its condition before submitting plans. Employing the Natural England Biodiversity metric, improvements to biodiversity have to be demonstrated. These improvements may include, <u>for example</u> , the creation of green corridors,

			increased tree planting , or enhancing existing habitat in open spaces as set out in the <u>Planning Obligations SPD; Green and Blue Spaces and Developer Contributions Supplementary Planning Documents (SPDs).</u>
<b>AM332</b>	<b>187</b>	<b>17.23</b>	<p>The <del>Draft</del> <u>Policy G5 of the London Plan (Policy G5 2021)</u> promotes the importance of sustainable urban greening as a fundamental element of site and building design proposals . This may include the incorporation of living roofs and walls or spaces for species to nest, roost or hibernate. <u>Examples include the installation of Swift bricks and bird/bat boxes in developments and providing safe routes for hedgehogs between different areas of habitat.</u> This is especially important in order to protect species or mitigate against any unavoidable loss, such as at brownfield sites. As well as providing a valuable habitat, landscaping serves to reduce the urban heat island effect created by climate change. In accordance with the <del>Climate Change Strategy</del> <u>Action Plan</u>, climate change tolerant species and/or native species are preferable in landscaping schemes. For developments of 10 <del>units</del> <u>homes</u> and above, developers will be encouraged to exceed the Urban Greening Factor <del>targets</del> <u>target scores</u> set out in <del>Policy G6</del> <u>Policy G5</u> of the <del>Draft London Plan</del>. As the <del>Local Plan</del> progresses, updated UGF targets specific to the borough may be developed into a <u>London Plan (2021)</u>. Further guidance will be provided in the <u>Green and Blue Spaces Supplementary Planning Document</u> which <del>provide further details on the soft landscaping approach that the Council is promoting in new development. (policies 79 – 80 (SPD).</del></p>
<b>AM333</b>	<b>187</b>	<b>17.25</b>	Geodiversity is also a key factor in the borough's cultural identity. The geodiversity of any area is an equally important part of its natural heritage as its biodiversity. Conservation, sustainable management, educational use and interpretation of geodiversity are thus as important as <del>that of</del> biodiversity or archaeology.
<b>AM334</b>	<b>187</b>	<b>17.26</b>	National policy requires sites with geological conservation interests to be protected. The <del>draft</del> <u>London Plan (2021)</u> stipulates that development proposals should give locally important geological sites <del>the</del> <u>a</u> level of protection commensurate with their importance. The protection provided in this Plan includes a presumption against hydraulic fracturing, otherwise known as 'fracking', on the basis that the British Geological Survey concluded in a 2014 report for the Department of Energy and Climate Change that “there is no significant Jurassic shale gas potential in the Weald Basin”. From this, <del>the draft</del> <u>London Plan (2021)</u> concludes that it is highly unlikely that there is any site that is geologically suitable for a fracking development in London
<b>AM335</b>	<b>187</b>	<b>17.27</b>	Planning for aggregates at the strategic level is provided by the <u>London Plan (2021)</u> . Waltham Forest has no requirement for a landbank apportionment in the <del>ITP-London Plan 2019</del> <u>(2021)</u> . However, the <u>London Plan (2021)</u> notes that there could be some potential for aggregate extraction beyond the boroughs identified. There is no history of gravel extraction in Waltham Forest in the recent past. As far as is known, the only materials present are gravels laid in shallow deposits across much of Leyton and South Walthamstow. They are mainly built over and their extraction is unlikely to be practical either in environmental or economic terms. Other deeper deposits are understood to be located in the Lee Valley, mainly on protected land owned by the Lee Valley Regional Park Authority and Thames Water Plc.
<b>AM336</b>	<b>188</b>	<b>17.29</b>	Through the use of Tree Preservation Orders ( <del>TPOTPOs</del> ), the Council will continue to protect trees that contribute to the amenity of an area or that are under threat from inappropriate pruning works or removal.
<b>AM337</b>	<b>188</b>	<b>17.30</b>	The trees of Waltham Forest are an important asset that provide numerous benefits to residents and visitors. <u>The London Urban Forest Plan (2020)<sup>(71)</sup> sets out the benefits of the urban forest and its place in the National Park City<sup>(72)</sup>.</u> These benefits include their contribution to <u>positive physical and mental health</u> , character and place making, the provision of habitats and biodiversity, the provision of shade and reductions to the urban heat island effect. Trees also play an important role in enhancing air quality and reducing surface water flooding. As such, it is important that existing trees are retained and complemented with new tree planting.

<b>AM338</b>	<b>189</b>	<b>17.31</b>	Tree planting should form an integral part of any development scheme and <u>trees</u> should be considered essential features for establishing well designed, high quality places. It is therefore important to plan for the planting of new trees part of a successful development. When identifying locations for new trees, it is vital that eventual root and branch growth <del>of a tree</del> are taken into account <del>when determining</del> <u>in order to determine accurately</u> how much space will be needed in the future to ensure the tree survives and thrives.
<b>AM339</b>	<b>189</b>	<b>17.32</b>	Existing trees should be integrated positively into new development. At the earliest stage of design, the relationship between the built form and retained trees <del>shall</del> <u>should</u> be fully considered. The appropriate arboricultural information should be obtained <del>and applied</del> , <u>applied and submitted as part of any planing application</u> to demonstrate that layouts have been informed by appropriate surveys and tree constraints mapping information.
<b>AM340</b>	<b>189</b>	<b>17.33</b>	Tree planting schemes should include a diverse range of appropriate species, ages and <del>sizes</del> <u>sizes</u> in order to contribute to a feeling of place, <del>-</del> <u>providing</u> instant impact and a biodiverse mature habitat, whilst complementing <del>the</del> <u>building</u> architecture.
<b>AM341</b>	<b>189</b>	<b>17.34</b>	Tree planting should seek to enhance public areas within developments whilst ensuring clear sightlines and open outlook are maintained so as not to <del>affect</del> <u>compromise</u> community safety. This should be achieved through appropriate species selection and well-designed planting schemes.
<b>AM342</b>	<b>189</b>	<b>17.36</b>	In exceptional circumstances, trees may be removed where the wider public planning benefit would outweigh their retention. The amenity value of existing trees should be evaluated through <u>the</u> Capital Asset Valuation of Amenity Trees (CAVAT) <u>method</u> and re-provided by the planting of mature trees of appropriate species across the scheme and/or <u>making</u> financial reimbursements to mitigate the loss of amenity, biodiversity and other benefits. CAVAT is a tool for measuring the amenity value of trees. It expresses the value of a tree in monetary terms in a way that is directly related to the quantum of public benefits that each tree provides.
<b>AM343</b>	<b>189</b>	<b>New Paragraph below 17.36</b>	<u>Any proposal that requires the removal of a significant tree to occasion development will require robust justification. The Council will resist the unsubstituted loss of trees and there is a general presumption towards retention, backed up by appropriate protection. Typically, the more prominent the tree the greater the likelihood it should be protected and retained. Where exceptional circumstances as referred to above arise, the council will expect a strong written justification by a suitably qualified individual, based upon and accompanied by the requisite standard of current evidence in support of the proposed tree removal.</u>
<b>AM344</b>	<b>190</b>	<b>17.37</b>	Epping Forest is a former Royal Forest, now managed by the City of London as the Conservators of Epping Forest since it was given to the people of London under the Epping Forest Act of 1878. The Epping Forest is a Natura 2000 Special Area of Conservation under the EC Habitats Directive transposed into UK law under the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. Natura 2000 is a network of sites selected to ensure the long-term survival of Europe's most valuable and threatened species and habitats. <sup>(5273)</sup>
<b>AM345</b>	<b>191</b>	<b>17.38</b>	<del>The</del> Epping Forest is the largest open space in London. It comprises ancient woodland and acid grassland occupying an area of approximately 2,450-hectares bordering London and Essex. It stretches from Manor Park to just north of Epping, with the main body of the Forest being located to the west of Loughton. Two thirds of the Forest has been designated a Site of Special Scientific Interest (SSSI) and a Special Area of Conservation (SAC).
<b>AM346</b>	<b>191</b>	<b>17.39</b>	Broadly, <u>the</u> Forest comprises a mix of habitats <sup>(5374)</sup> as follows: Inland water bodies (6%), Bogs, Marshes, Fens (0.2%), Heath, Scrub (3.8%), Dry grassland, Steppes (20%) and Broad-leaved deciduous woodland (70%).

<b>AM347</b>	<b>191</b>	<b>17.40</b>	Owing to its location and its general accessibility, it is a popular visitor destination. There are 52 different car parks and four visitor centres on Epping Forest land. (Epping Forest Visitor Survey 2019 Footprint Ecology p3) The most recent estimate of visitor use indicate around 4.2 million visitors each year. <sup>(54)</sup> .
<b>AM348</b>	<b>191</b>	<b>17.41</b>	As distinct from the larger part of the Forest, <del>The forest,</del> the Epping Forest SAC forms the edge of the borough along its northern aspect where the borough abuts the administrative area of Epping Forest District Council and the eastern edge where the borough abuts the London Borough of Redbridge with the London borough of Newham lying further to the south beyond Wanstead Flats. It should be noted that the entirety of Waltham Forest Borough lies within the <del>6.36km</del> <u>6.2km</u> Zone of influence (ZOI) of the SAC.
<b>AM349</b>	<b>191</b>	<b>17.42</b>	In recent years <del>however</del> the challenge to <del>balance</del> <u>of balancing</u> the needs of the high (and growing) numbers of visitors with the natural aspect of the Forest and the nature conservation interest <u>of the SAC</u> has become more challenging. Accordingly, the Council has been working with neighbouring authorities in London and Essex as part of the Memorandum of Understanding (MoU) Group under the “Duty to Cooperate” introduced under the Localism Act 2011.
<b>AM350</b>	<b>191</b>	<b>17.44</b>	There are known current challenges to the integrity of the SAC in which Waltham Forest plays a role. These include in particular, threats posed by air pollution and recreational pressures. The main threats and challenges are set out in Natural England’s (NE’s) European Site Conservation Objectives: <sup>(5575)</sup>
<b>AM351</b>	<b>193</b>	<b>17.47</b>	The Lee Valley Regional Park is a major asset for Waltham Forest providing valuable benefits to local communities in terms of access to nature and to healthy outdoor recreation. The Council supports Lee Valley Regional Park Authority ‘s Park Development Framework. The Council will work cooperatively with the Lee Valley Regional Park Authority in protecting and enhancing the Lee Valley Regional Park and the Special Protection Area- <u>(SPA). Development proposals that would result in additional urbanisation or recreation effects will be encouraged to have early discussions and engagement with Natural England on potential mitigation measures.</u>
<b>AM352</b>	<b>194</b>	<b>17.50</b>	Waterways in Waltham Forest support a range of ecological resources, many of which are covered under European and national legislation. <del>Enhancement measures</del> <u>Environmental net benefits</u> such as naturalisation and deculverting are valuable for the management of nature conservation and flood risk of waterways. Wider regeneration objectives can be met through the enhancement of the quality and amenity value of the water environment. To ensure this is achieved, the Council will consult the Environment Agency so that adequate evaluation can be undertaken and statutory consents can be granted. It is preferable that <del>Flood Defence Consent</del> <u>an Environmental Permit</u> is obtained after planning permission has been granted.
<b>AM353</b>	<b>194</b>	<b>New Paragraph</b>	<u>Environmental Permits are required for any activities which will take place on or within 8m of a main river (16m if tidal), on or within 8m of a flood defence or culvert (16m if tidal), involving quarrying or excavation within 16m of a main river, flood defence or culvert in a floodplain more than 8m from the riverbank, culvert of flood defence structure and there is no planning permission.</u>
<b>AM354</b>	<b>194</b>	<b>17.51</b>	The presence of the River Lee and the Lee Valley Regional Park are among the key defining characteristics of the borough . Water quality and water resource management have direct impacts on the public’s ability to enjoy the Park’s leisure, sporting and nature conservation facilities and sites. Water is intrinsic to many of the Park’s nationally and internationally recognised sites, such as the Lee Valley Special Protection Area (SPA) and <del>RAMSAR</del> <u>Ramsar</u> site (Following the international

			Convention on Wetlands held in Iran in 1971). The Park is also host to the Walthamstow Reservoirs and Marshes, the Waterworks attraction on Lea Bridge Road, in addition to boating activities on the River Lee and <del>its navigation Canal(s)</del> <u>the River Lee Navigation</u> .
<b>AM355</b>	<b>195</b>	<b>New Paragraph after 17.53</b>	<u>Waterways are also valuable for freight transport, providing key routes through London. It is therefore important that such use is not inhibited, but increased.</u>
<b>AM356</b>	<b>195</b>	<b>17.54</b>	<del>Waterways are also valuable for freight transport, providing key routes through London. It is therefore important that such use is not inhibited and increased.</del> The Council is keen to increase public access to waterways for recreation, but this should be balanced with the need to prevent undue disturbance on sensitive species and habitats. This is particularly relevant in the case of the <u>Walthamstow Wetlands</u> <del>has been achieved at the Walthamstow Wetlands,</del> where the aspiration <del>has been to</del> establish better access to nature, enhance heritage assets and foster connectivity with other open spaces including the <u>Queen Elizabeth Olympic Park</u> . <del>Accordingly</del> <u>has been realised</u> . Where relevant, the Council will seek to retain these benefits through the planning application process and the use of <del>planning obligations</del> <u>developer contributions</u> as set out in the <del>Planning Obligations SPD</del> <u>Developer Contributions Supplementary Planning Document (SPD)</u> .
<b>AM357</b>		<b>86</b>	<b>Policy 86 - Food Growing and Allotments</b>  Existing allotments are accorded the highest level of protection in this <del>plan</del> <u>Plan</u> .  A. There should be no net loss of allotment sites, and the intensification of land currently used to grow food will be <del>acceptable</del> <u>supported</u> where management arrangements allow.  Development proposals will be expected to contribute to the supply, quality and accessibility of private and communal spaces on which to grow food and flowers. This may be in the form of financial or on-site contributions. On-site contributions must be supported by a maintenance plan at application stage.
<b>AM358</b>	<b>196</b>	<b>17.59</b>	The main tools the Council has in delivering the policies in this section of the Plan are through <u>the planning application process and allocation of sites in Local Plan 2- Site Allocations</u> . Other tools and initiatives available to support implementation <u>include</u> : <ul style="list-style-type: none"> <li>• <del>Planning application process</del></li> <li>• <del>Planning Obligations SPD and Section 106 contributions.</del></li> <li>• <del>Mitigating the Impact of Development on SAC/SPA SPD.</del></li> </ul> The Council will also work with partners including neighbouring local authorities, the <del>Conserefvators</del> of Epping Forest and Natural England to improve access to open space <del>recreational areas and to protect designated sites such as Epping Forest and the Lee Valley Regional Park.</del> <ul style="list-style-type: none"> <li>• <u>Developer Contributions through Community Infrastructure Levy (CIL) and Section 106 contributions;</u></li> <li>• <u>The Green and Blues Spaces Supplementary Planning Document (SPD) (including the Suitable Alternative Natural Greenspace Strategy) and the Developer Contributions Supplementary Planning Document (SPD); and</u></li> </ul>

- Ongoing work with partners, including neighbouring local authorities, the Conservators of Epping Forest, the Lee Valley Regional Park Authority and Natural England to improve access to open space recreational areas and to protect designated sites such as the Epping Forest SAC and the Lee Valley Regional Park SPA.

## Chapter 18: Addressing the Climate Emergency

Ref	Page	Policy / Paragraph	Modification
AM359	197	18.1	At a Full Council Meeting in April 2019, Waltham Forest declared a Climate Emergency. Strategically addressing climate change is a key challenge facing the borough in delivering sustainable development. <del>With significant pressure for growth, we</del> <u>We</u> must ensure that new development adds to the borough's capacity for resilience in mitigating and adapting to any adverse climate change impacts. Careful management must be taken to minimise any further impact on the natural environment now that the borough has formally declared a climate emergency.
AM360	197	New Paragraph after 18.1	<u>Waltham Forest is committed to reaching net zero carbon emissions by 2030. To achieve this target, the Council has published a Climate Action Plan <sup>(77)</sup> which sets out 20 actions across the following four areas:</u> <ol style="list-style-type: none"> <li>1. <u>Energy efficient buildings - ensure all residents can live comfortably and affordably</u></li> <li>2. <u>A place for people not cars - where residents can travel affordably, safely and easily using active travel, like walking and cycling, and sustainable mass transport, like bus and rail.</u></li> <li>3. <u>Consuming less, recycling more - where we produce less waste, use less plastic, and meet our needs in new collaborative ways through sharing, reusing and repairing.</u></li> <li>4. <u>A greener, more resilient borough - promote nature, health and wellbeing and increases the resilience of communities to future heatwaves and floods.</u></li> </ol>
AM361	198	18.2	<del>To align with London Plan targets, (2021) targets and the transition towards zero carbon set out in our forthcoming Climate Change Strategy will be strongly supported. A</del> <u>the Council's ambition for zero carbon emissions by 2030, a clear carbon reduction target must be set to support this ambition and attention focused on delivering energy efficient development in accordance with the Mayor's energy hierarchy. This energy hierarchy aims to minimise demand and address supply and renewable energy provision. This will be the context for the use of smart technologies and low-carbon and renewable energy sources.</u>
AM362	199	New Paragraph after 18.3	<u>The Council encourages energy efficiency improvements to existing buildings going beyond minimum building regulations requirements. Applications for retrofitting Listed buildings or properties in conservation areas should seek advice from the Council's Conservation Officer at an early stage. This would confirm if planning permission is required and consider whether</u>



			<u>installing the energy efficiency measures would have a detrimental impact on the building. Further guidance will also be provided in the Retrofit and Residential Extension Supplementary Planning Document (SPD).</u>
<b>AM363</b>	<b>199</b>	<b>18.5</b>	<u>Carbon Offset Fund (COF) contributions will be expected from all major developmentsrelevant development where carbon targets cannot be met on-site. This will fund carbon reduction projects within the borough and will help to offset the carbon impact of development. It is recognised that on-site reductions have a greater impact on reducing carbon emissions than financial contributions 'in lieu and therefore we would expect that' and therefore the Council expects all developments achieve a minimum of 35% on -site carbon reduction as per Policy 87 'A Zero Carbon Borough'.</u>
<b>AM364</b>	<b>200</b>	<b>New Paragraph after Policy 88</b>	<u>The London Plan (2021) recognises that decentralised energy and local secondary heat sources will become an increasingly important element of London's energy supply and help London become more self-sufficient and resilient in relation to its energy needs.</u>
<b>AM365</b>	<b>200</b>	<b>18.6</b>	<u>The 2016 London Plan set a target to generate 25% of its heat and power through local decentralised energy systems by 2025 with proposals to further reduce carbon emissions through the use of zero or low-emission, decentralised energy where feasible. The adoption of decentralised energy systems increases heating efficiencyadoption of district heating systems is a form of decentralised energy which increases heating efficiency, allows quicker decarbonisation of heat and will help Waltham Forest decrease its carbon emissions. DevelopmentsNew development in the borough will therefore be expected to install communal heating systems and instigate or connect to decentraliseddistrict heating energy networks where appropriate, to provide a more sustainable source of heating and hot water in line with the London Plan.</u>
<b>AM366</b>	<b>201</b>		<u>By aiming to exceed national standards (such as Building Regulations) and encouraging development that enhances the natural environment, this policy will further support low-carbon, sustainable development. Accordingly, all non-residential developments will be also expected to achieve BREEAM (Building Research Establishment Environmental Assessment Method) targets (a minimum of BREEAM 'very good'). The adoption of sustainable design principles, use of sustainable construction methods and building materials in addition to measures to increase resource efficiency will be supported. This will help to reduce greenhouse gas emissions, aid prevention of adverse environmental impacts, and help to ensure resilience to the impacts of climate change. Guidance as set out in the Mayor of London's 'The Control of Dust and Emissions During Construction and Demolition' Supplementary Planning Guidance (SPG) <sup>(78)</sup> should also be followed.</u>
<b>AM367</b>	<b>201</b>	<b>18.7</b>	<u>If BREEAM, Home Quality Mark, Passivhaus or the Mayor's Sustainable Design and Construction Supplementary Planning Guidance (SPG) <sup>(79)</sup> is replaced or amended during the lifetime of the planthis Plan, the equivalentequivalent replacement requirements will be applied.</u>
<b>AM368</b>	<b>201</b>	<b>New Paragraph after 18.7</b>	<u>Applications for retrofitting Listed buildings or properties in Conservation Areas to ensure greater energy efficiency, should seek advice from the Council's Conservation Officer at an early stage. This would confirm if planning permission and/or listed building consent is required and consider whether installing the energy efficiency measures would have a detrimental impact on the heritage significance of the building or the conservation area. A new Retrofit and Residential Extensions Supplementary Planning Document (SPD) will provide additional guidance on this.</u>
<b>AM369</b>	<b>202</b>	<b>18.8</b>	<u>Air pollution has significant impacts on climate and human health. It is essential that exposure to atmospheric pollutants is minimised across the borough. Due to its high air pollution levels, Waltham Forest has published an Air Quality Action Plan</u>

			<del>(2018)</del> for 2023 to 2028 <sup>(80)</sup> establishing plans to improve local air quality; <u>which is a priority within the borough.</u> Existing concentrations of nitrogen dioxide and particulates (PM2.5, PM10) are of considerable concern and pose a significant threat to human health; <u>particularly</u> where they are most heavily concentrated along major roads and in areas of high motor vehicle activity.
<b>AM370</b>	<b>202</b>	<b>18.9</b>	Development that aims to improve upon air quality neutral standards will be strongly supported, <u>and larger scale developments in particular will be expected to be air quality positive in line with the London Plan (2021).</u> Innovative design solutions, urban greening and other mitigation strategies will also be encouraged to improve air quality in all <del>developments</del> <u>relevant development proposals.</u> In accordance with the London Plan, <del>air quality assessments (2021),</del> <u>Air Quality Assessments</u> will be required for major developments, developments associated with sensitive uses/receptors and where considerable demolition will occur.
<b>AM371</b>	<b>202</b>	<b>18.10</b>	<del>Air quality assessments</del> <u>Quality Assessments</u> will also be required where there will be a significant increase in vehicular traffic and the use of more polluting technologies including the use of <del>non-road mobile machinery</del> <u>Non-Road Mobile Machinery</u> (NRMM) in construction. This will help to identify any major sources of pollution, constraints placed on sites by poor air quality, suitable land uses for sites, and design strategies that could improve air quality. Direct exposure to air pollution will be minimised through intelligent design of new development, and the plan will support on/off-site measures where they clearly demonstrate the delivery of air quality improvements in line with the London Plan.
<b>AM372</b>	<b>202</b>	<b>New Paragraph after 18.10</b>	<u>Development proposals will be required to submit Transport Assessments in line with the requirements of Policy 65 'Development and Transport Impacts', to ensure that there is an overall net reduction in traffic and improvement in air quality across the borough as a result of Plan policies. Traffic which may affect air quality within 200m of the Epping Forest Special Area of Conservation (SAC) will be monitored through Policy 97 'Monitoring Growth Targets'</u>
<b>AM373</b>	<b>203</b>	<b>18.11</b>	Maintaining a high level of water supply and quality are critical within the borough, as are measures to improve water use efficiency. Climate change increases the likelihood of serious and prolonged droughts, owing to increasing temperatures and climatic variability. <del>New</del> <u>Without appropriate control and mitigation,</u> development can lead to decreased water quality through pollution and put stress on the existing water supply and waste-water infrastructure. With water demand soon <del>forecasted</del> <u>forecast</u> to exceed water supply, the borough needs to adapt to increasing water scarcity, especially during summer months and it must ensure the prevention of water pollution through new development. This policy aims to address both issues, and will support development that devises appropriate mitigation measures to protect water quality in line with the Thames River Basin Management Plan and Catchment Flood Management Plans.
<b>AM374</b>	<b>203</b>	<b>New Paragraph after 18.11</b>	<u>In line with the London Plan (2021), water efficiency measures will be required to help maximise water supply and the Council will require developers to meet water consumption targets of 105 litres plus an allowance of 5 litres per-person for external water use or less per day per person in residential developments.</u>
<b>AM375</b>	<b>203</b>	<b>18.12</b>	<del>In line with the London Plan,</del> water efficiency measures will be supported to help maximise water supply and we will strongly encourage developers to meet water consumption targets of 105 litres plus an allowance of 5 litres per person for external water use or less per day per person in residential developments. Water saving and reuse fittings and appliances, alternative water sources and low water-consuming landscaping can all help to maximise water efficiency. Developers should follow best practice guidance as set out in the Mayor of London's 'Sustainable Design and Construction' <del>SPG</del> <u>Supplementary Planning Guidance (SPG).</u>

			In addition, non-residential development and refurbishments will be required to achieve maximum BREEAM water credits to help conserve water.
<b>AM376</b>	<b>203</b>	<b>18.13</b>	The mismanagement of sewer systems leads to significant contamination from foul water in the borough's open surface water. Careful management of this infrastructure is therefore critical, and we will ensure that new development proposals incorporate designs that prevent cross-contamination between foul and surface water, as required in the London Plan (2021). The sufficient provision of wastewater infrastructure capacity will also be essential in order to appropriately manage foul and wastewater, in addition to minimising the pressure placed on combined sewer networks. This will further reduce the risk of contamination and water pollution, which will lead to a more sustainable water supply and improved health.
<b>AM377</b>	<b>204</b>	<b>18.14</b>	Land that is seen to be affected by contamination will require thorough site visits and desk-based research, in addition to appropriate remediation strategies where new development is expected. <del>In addition, this Local Plan will support developments which have proposed</del> <u>This Plan supports developments which include mitigation measures to reduce the impact of land contamination on people and the environment, whilst and carefully manages the impact of development on sensitive receptors will be also carefully managed.</u>
<b>AM378</b>	<b>204</b>	<b>New Paragraph after 18.14</b>	<u>When undertaking site assessments, site investigations, desk-based research and Preliminary Risk Assessments (PRAs) the guidance to be consulted includes The Environment Agency's approach to groundwater protection (2018), the Model Procedures for the Management of Land Contamination (CLR11), and Managing and reducing land contamination: guiding principles (GPLC).</u>
<b>AM379</b>	<b>207</b>	<b>18.16</b>	Surface Water runoff should be mitigated by the use of sustainable urban drainage systems (SuDs) which are calculated inline with runoff estimation methods set out in CIRIA C753, (The SuDs Manual), and the incorporation of recycling of grey water and utilisation of natural filtration methods where possible. Urban greening, landscaping and other mitigation strategies within this green and blue infrastructure approach (see Policy 79 'Green Infrastructure and the Natural Environment') will also be strongly encouraged in new and existing development to minimise the impacts of flooding from multiple sources (including surface water, groundwater and watercourses). Development will also be expected to follow the drainage hierarchy to ensure off-site discharge rates meet greenfield runoff rates, utilising SuDS in particular. Maximising water storage capacity will help to alleviate the intensity of flood events by providing a greater volume for rainfall attenuation; a key strategy to increase long-term resiliency across the borough.
<b>AM380</b>		<b>18.17</b>	Climate change will increase the severity and frequency of extreme heat events in the borough over the coming years. Where the Urban Heat Island will exacerbate these increased temperatures, Waltham Forest must seek to mitigate and adapt to increase its resiliency. This policy aims to address the issue of overheating, and this <del>plan</del> <u>Plan</u> will support development that utilises sustainable design and construction principles to help reduce internal and external temperatures and improve human comfort.
<b>AM381</b>		<b>18.18</b>	To analyse their risk of overheating, new developments will be required to undertake overheating assessments in line with <u>CIBSE Chartered Institute of Building Services Engineers (CIBSE) guidance as set out in the GLA's 'guidance on preparing energy assessment guidance as part of planning applications'</u> . Development proposals should also adopt the London Plan's cooling hierarchy to mitigate overheating and avoid reliance on air conditioning systems. This cooling hierarchy includes

			measures such as passive ventilation, active low-carbon cooling systems, mechanical ventilation, energy efficient design, high ceilings, shading and green infrastructure, which can all serve to reduce internal temperatures. To reinforce this, new development will also be expected to provide appropriate mitigation measures to address overheating, and the plan will strongly encourage the use of blue-green infrastructure and urban greening as sustainable cooling options for both internal and external environments.
<b>AM382</b>		<b>New Paragraph after 18.18</b>	<p>The main tools the Council has in delivering the policies in this section of the Plan are through the planning application process and allocation of sites in Local Plan 2 - Site Allocations. Other tools and initiatives available to support implementation include:</p> <ul style="list-style-type: none"> <li>• <u>The Waltham Forest Climate Action Plan;</u></li> <li>• <u>Relevant Mayoral Supplementary Planning Guidance;</u></li> <li>• <u>Chartered Institute of Building Services Engineers Knowledge and Research; and Retrofit and Residential Extensions, Developer Contributions, Exemplar Design and</u></li> <li>• <u>Green and Blue Places Supplementary Planning Documents (SPDs).</u></li> </ul>

<b>Chapter 19: Promoting Sustainable Waste Management</b>			
<b>Ref</b>	<b>Page</b>	<b>Policy / Paragraph</b>	<b>Modification</b>
<b>AM383</b>	<b>208</b>	<b>19.2</b>	Historically, waste management has involved the collection of waste and its subsequent transportation for disposal at landfill sites. These days, greater focus is placed on the environmental impacts of waste generation and the importance of using resources efficiently. Accordingly, there has been significant changes to waste management <del>evident</del> , <u>as evidenced</u> by the increasing opportunities for residents to separate waste prior to kerbside collections, efficient transportation of materials, use of advanced mechanical recycling facilities and even use of waste as a renewable energy source. The increased focus on the importance of management means that an appropriate network of waste management facilities must be planned for locally.
<b>AM384</b>	<b>208</b>	<b>19.3</b>	The seven North London Boroughs, as Waste Planning Authorities (WPA) <del>are preparing a Waste Local Plan,</del> <u>have prepared the North London Waste Plan (NLWP) which was adopted in Waltham Forest in March 2022.</u> This requirement comes from Article 28 of the European Union (EU) Waste Framework Directive, the National Waste Management Plan for England and the National Planning Policy for Waste (NPPW). The partnership project involves the London Boroughs of Barnet, Camden, Enfield, Hackney, Haringey, and Islington & Waltham Forest.

<b>AM385</b>	<b>209</b>	<b>19.4</b>	This policy must be read in conjunction with other policies of the Plan-including Policy 56: Delivering High-Quality Design, Policy 59: Residential Amenity, Policy 66 'Deliveries, Freight and Servicing' and Policy 89 'Sustainable Design and Construction'.
<b>AM386</b>	<b>209</b>	<b>19.6</b>	The North London Waste Plan (NLWP) <del>is currently at examination with modifications to be consulted upon in summer 2020</del> was adopted by Waltham Forest in March 2022. The plan identifies a range of suitable sites/areas to meet the <del>north London boroughs</del> North London Boroughs' future waste management needs and thereby support increased self-sufficiency for London and better use of resources. It sets out a range of policies designed to support determination of planning applications for waste facilities <del>as well as</del> <u>and to</u> ensure a more general and sustainable approach to waste and resource management.
<b>AM387</b>	<b>209</b>	<b>19.7</b>	The NLWP plans for all principal waste streams including: <ul style="list-style-type: none"> <li>• Local Authority Collected Waste (LACW): Waste collected by a Local Authority, including household and trade waste;</li> <li>• Commercial and Industrial (C&amp;I): Waste produced by businesses and industry;</li> <li>• Construction, Demolition &amp; Excavation (CD&amp;E): Waste generated as a result of delivering infrastructure projects, building, renovation and the maintenance of structures; Hazardous: A sub -category of all waste streams where the material produced is hazardous and requires specialist treatment;</li> <li>• Agricultural Waste: Waste produced by farming and forestry activity;</li> <li>• Waste Water / Sewage Sludge: Waste produced from washing, cleaning and hygienic activities to create waste water and sewage effluents; and</li> <li>• Low level radioactive waste (LLW): Waste associated with the undertaking of <del>x-rays</del> <u>x-rays</u> and laboratory testing using low level radioactive substances.</li> </ul>
<b>AM388</b>	<b>210</b>	<b>19.8</b>	As part of the North London Waste Authority, the Council will ensure that waste and refuse is dealt with sustainability and in alignment with the North London Waste Plan (NLWP) <del>once it is adopted as well as during the interim period before its adoption. This plan.</del> <u>This Plan</u> will also ensure the protection and retention of existing waste sites as required in the London Plan (2021).
<b>AM389</b>	<b>210</b>	<b>19.9</b>	The NLWP contains policies covering the following issues: Existing waste management sites; <ul style="list-style-type: none"> <li>• Locations for new waste management facilities;</li> <li>• Windfall sites;</li> <li>• Re-use &amp; Recycling Centres ;</li> <li>• Assessment criteria for waste management facilities and related development; Energy recovery and decentralised energy;</li> <li>• Waste-Water Treatment Works and Sewage Plant; and Control of Inert Waste</li> </ul>
<b>AM390</b>	<b>210</b>	<b>19.10</b>	<del>Once adopted the NLWP will form</del> <u>The NLWP forms</u> part of the overarching planning framework used for the determination of planning applications relating to proposed or existing waste facilities in Waltham Forest and North London generally.

<b>AM391</b>	<b>210</b>	<b>19.12</b>	The Council <del>has published separate</del> publishes additional guidance for developers on the provision of waste and recycling facilities in new developments ( <del>Waltham Forest Waste and Recycling Guidance for Developers</del> ). This sets out the operational requirements and standards expected relating to the provision of external waste storage areas/spaces for dry recycling, food waste recycling, and measures to enable safe, regular and easy refuse collections and to alleviate traffic congestion. <u>Further guidance will also be included in the Exemplar Design Supplementary Planning Document (SPD).</u>
<b>AM392</b>	<b>211</b>	<b>19.14</b>	The main tools the Council has in delivering the policies in this section of the Plan are through : <ul style="list-style-type: none"> <li>• the planning application process;</li> <li>• <u>The Exemplar Design Supplementary Planning Document (SPD) and other informal guidance for developers; and</u></li> <li>• ongoing work with the North London Waste Plan partner boroughs.</li> </ul>

<b>Chapter 20: Delivering the Plan</b>			
<b>Ref</b>	<b>Page</b>	<b>Policy / Paragraph</b>	<b>Modification</b>
<b>AM393</b>	<b>212</b>	<b>20.1</b>	This section provides an overview of the ways in which the Council will deliver and monitor the delivery of this Local Plan, including its Vision, Strategic Objectives and Policies, <del>including</del> <u>and</u> how the Council will: <ul style="list-style-type: none"> <li>• Take forward and implement the overall spatial strategy and area based policies as set out;</li> <li>• Make use, where appropriate, of the Councils planning powers and tools to support the delivery of sites allocated in the plan;</li> <li>• Make use of Planning Obligations and the Community Infrastructure Levy (CIL) to mitigate development impacts and fund essential infrastructure;</li> <li>• Take account of development viability, risk and contingency; Monitor the progress and success of the plan;</li> <li>• If required, trigger a review of the plan.</li> </ul>
<b>AM394</b>	<b>212</b>	<b>20.3</b>	The development management process will be key in the way which the Local Plan will be implemented. Both the overall spatial strategy and the detailed policies of the Local Plan will provide the starting point for the determination of planning applications, together with the National Planning Policy Framework (NPPF), the London Plan and any other relevant Supplementary Planning Documents ( <del>SPD's</del> <u>SPDs</u> ), Neighbourhood Plans or other material considerations where relevant.
<b>AM395</b>	<b>212</b>	<b>20.5</b>	The Council has a key place-shaping role to play and will make use of all appropriate mechanisms and assets, including:

			<ul style="list-style-type: none"> <li>• Producing more detailed guidance in the form of Supplementary Planning Documents (<u>SPD's</u>SPDs), Development Plan Documents (<u>DPD's</u>DPDs), masterplans or planning briefs to support community, landowners or developers with specific area _based regeneration and delivery, particularly where new development opportunities arise over the life-time of the plan;</li> <li>• Proactive coordination of the borough's statutory and non-statutory functions, including (but not limited to) as Local Planning Authority, Education Authority, Local Highways Authority, Lead Local Flood Authority, Public Health Commissioner, supported by other key departments including Parks and Open Space, Community Safety, Air Quality and Design and Conservation, amongst others;</li> <li>• Facilitating access to government grants as they arise, European funding and prudential borrowing;</li> <li>• Strategically <del>prioritised</del><u>prioritise</u> investment of the Council's Community Infrastructure Levy (CIL) and Carbon Offset Fund (COF);</li> <li>• Effective and efficient use of Section 106 Agreements to secure affordable housing provision and mitigate the impacts of development at the local level, such as impacts on Air Quality;</li> <li>• Working in partnership with other statutory delivery agencies (e.g._The Greater London Authority, Transport for London (TfL), Waltham Forest Clinical Commissioning Group (CCG), Utility companies including water, electric and gas, the Environment Agency, Natural England, Sport England_etc) to ensure that essential infrastructure is provided; Working in a positive spirit of partnership with landowners and developers and other private sector organisations including Business Improvement Districts, Trader Associations and other business networks to secure deliverable development proposals and investments;</li> <li>• Engaging with education and skills providers and other organisations to support skills and training initiative in the <del>Borough</del><u>borough</u>;</li> <li>• Use of funding and incentives available through opportunities like Housing Zones and Enterprise Zones;</li> <li>• Efficient and effective application of Development Management, Enforcement and other regulatory functions;</li> <li>• Use of the Council's Compulsory Purchase powers to assist with site assembly challenges where appropriate;</li> <li>• Support for locally driven aspirations including Neighbourhood Planning, Assets of Community Value (ACV) and other local initiatives;</li> <li>• Use of other funding sources and mechanisms such as Housing Infrastructure Fund, Good Growth Fund, New Homes Bonus, Business Rates Retention, National Heritage Lottery Fund, development incentives and other incentives as and when they arise; Proactive use of the Councils assets to facilitate and assist delivery.</li> </ul>
<b>AM396</b>	<b>214</b>	<b>20.9</b>	<p>With regard to improvements in transport infrastructure, funding opportunities include:</p> <ul style="list-style-type: none"> <li>• Local Implementation Plan (LIP) / <u>Streetspace</u> funding Transport for London (TfL) Growth Fund</li> <li>• TfL Step Free Programme</li> <li>• TfL Liveable Neighbourhoods fund</li> <li>• Department for Transport (DfT) Access for All Programme</li> <li>• Low Emissions Neighbourhood funding</li> <li>• <u>Developer contributions</u></li> </ul>

<b>AM397</b>	<b>214</b>	<b>20.12</b>	<p>Planning Obligations are used for three principal purposes:</p> <ul style="list-style-type: none"> <li>• <b>Prescribe</b> the nature of development e.g requiring a given proportion of housing is affordable;</li> <li>• <b>Compensate</b> for the loss or damage arising from a development e.g loss of employment or open space</li> <li>• <b>Mitigate</b> a developments impact e.g through increased public transport provision</li> </ul>
<b>AM398</b>	<b>215</b>	<b>20.20</b>	<p><del>It should be noted that at the time of writing, Government is consulting on proposals through the White Paper</del>  <u>The Council notes Government's proposals</u> to merge the existing Community Infrastructure Levy (CIL) and Section.106 Planning Obligations to create a new 'Infrastructure Levy', with any payments due under the new system linked to the final value of a development. The Council is committed to securing maximum investment leverage in the boroughs infrastructure and will work proactively with regard to any future successor regulations as enacted by Parliament throughout the lifespan of the plan-</p>
<b>AM399</b>	<b>217</b>	<b>20.25</b>	<p><del>The Borough wide IDP will also be supplemented by Site Delivery Plans, where necessary. The IDP</del>  <u>IDP</u> and any supporting infrastructure delivery analysis should be considered a 'live document' and will be updated regularly to ensure progress is measured and ensure funding, initiatives and actions are targeted.</p>
<b>AM400</b>	<b>218</b>	<b>20.26</b>	<p>The Council and its stakeholders recognise that the housing and commercial property markets are inherently cyclical and that this plan has been prepared at a time when the market has experienced a period of sustained economic and value growth, albeit with a decreasing level of confidence and certainty in the wider London and national economy arising from the <del>referendum on the UK's membership of</del>  <u>departure of the UK from</u> the European Union.</p>
<b>AM401</b>	<b>218</b>	<b>20.27</b>	<p><u>This Plan is supported by a Whole Plan Viability Study. Planning Policy Guidance mentions that where up-to-date policies have set out the contributions expected from development, planning applications that fully comply with them should be assumed to be viable and the applicant will need to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage.</u></p>
<b>AM402</b>	<b>218</b>	<b>20.30</b>	<p>In addition to annual performance monitoring through the AMR, at the end of 5 years after the adoption of the Local Plan, the Council in conjunction with its stakeholders will undertake a comprehensive analysis of the cumulative housing, employment and infrastructure delivery to date in the <del>Borough</del>  <u>borough</u>. If delivery is lagging significantly behind the projected cumulative target for the period or delivery is not being supported or guided by the policies of the plan, the Council will undertake a review of the Local Plan and its implementation mechanisms to create a conducive environment for key sites to come forward for delivery.</p>
<b>AM403</b>	<b>219</b>	<b>20.31</b>	<p>The Local Plan sets out how the <del>Borough</del>  <u>borough</u> will develop over the plan period to 2033, identifying where the homes, jobs, services and infrastructure will be delivered and the type of distinctive places and environments that we want to see created.</p>
<b>AM404</b>	<b>219</b>	<b>20.33</b>	<p>Monitoring the impact of the plan is crucial to the successful delivery of our current plan and to inform the development of any future development plan for the <del>Borough</del>  <u>borough</u>. Statutorily, under Section 113 of the Localism Act 2011 and Section</p>



			35 of the Planning and Compulsory Purchase Act 2004, each year the Council must produce reports which assess the implementation of the Waltham Forest Local Plan and the extent to which its policies and targets are being achieved.
<b>AM405</b>	<b>219</b>	<b>20.35</b>	Some of the indicators that have been included will be influenced by many factors and not just the Local Plan, but they still provide a useful way of monitoring the overall outcomes that the document is seeking to help the Borough achieve. For some policies, quantitative indicators will not be appropriate, and the main focus will be on monitoring whether there have been any significant challenges with implementing the policies through the development management process, for example because of a change in circumstances. For other policies, it will be important to monitor key projects that will help deliver those policies, not all of which will be specifically mentioned in the Local Plan. It will also be important to monitor the wider policy context, to ensure the Local Plan remains consistent and in conformity to the London Plan, <del>National</del> <u>national</u> policy and other key plans and strategies which influence growth and development in the <del>Borough</del> <u>borough</u> .
<b>AM406</b>	<b>219</b>	<b>20.36</b>	If, as a result of monitoring, issues are identified in terms of a policy not achieving its intended outcome, or key policy and delivery targets are not being met, this may give rise to or trigger a review of the Local Plan and the policies contained therein (see Policy_97 'Monitoring Growth Targets').
<b>AM407</b>	<b>220</b>	<b>20.38</b>	The HDT compares the net homes delivered over the preceding three years to the homes that should have built over the same period. Full details of the methodology are set out in the HDT Measurement Rule Book <sup>(5684)</sup> .
<b>AM408</b>	<b>220</b>	<b>20.40</b>	As required by the National Planning Policy Framework and Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012, the Local Planning Authority will initiate a full review of the plan within 5 years of adoption. The purpose of the review is to ensure the <del>Borough's</del> <u>borough's</u> development frameworks <del>take</del> <u>take</u> account of changing circumstances affecting the area, or any relevant changes in national planning or plan making policy. Relevant strategic policies will need updating at least once every five years if the <del>Borough's</del> <u>borough's</u> local housing need figure has changed significantly or is expected to change significantly in the near future.
<b>AM409</b>	<b>220</b>	<b>20.41</b>	As part of the overall Monitoring Strategy, the Council will monitor progress towards the achievement of key growth targets as set out in Policy 97 'Monitoring Growth Targets'. Monitoring is required to ensure that the policies set out in the plan are relevant and effective. Regular monitoring will include analysis of delivery data and trends, take account of changes in legislation at the sub-regional and national level and reviewing the <del>plan's</del> <u>plan's</u> supporting evidence base where necessary. Monitoring progress against targets also provides a basis to trigger a whole or partial review of the plan, policies, strategies or actions to reflect changing circumstances.

<b>Glossary</b>			
<b>Ref</b>	<b>Page</b>	<b>Policy / Paragraph</b>	<b>Modification</b>

<b>AM410</b>	<b>280</b>	<b>NEW</b>	<b>15 Minute Neighbourhood-</b> <u>15-Minute Neighbourhoods are places where people can easily reach most, if not all, of the facilities, experiences and activities they need on a daily basis, within a short walk, wheel, or cycle from home</u>
<b>AM411</b>	<b>280</b>		<p>Affordable housing- <del>housing</del><u>Housing</u> for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions:</p> <p>Affordable housing for rent- <del>meets</del><u>Meets</u> all of the following conditions: (a) the rent is set in accordance with the Government's rent policy for Social Rent or Affordable Rent, or is at least 20% below local market rents (including service charges where applicable); (b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent) Starter homes- Generally a starter home is a compact house or flat specifically designed and built to meet the requirements of young people buying their first home per Sections 2 and 3 of the Housing and Planning Act 2016 .</p> <p>Discounted market sales housing- <u>Housing that</u> is that sold at a discount of at least 20% below local market value. Eligibility is based on local incomes and local house prices and provisions should be in place to ensure housing remains at a discount for future eligible households.</p> <p><del>Other affordable routes to home ownership</del><u>Other affordable routes to home ownership- this</u><u>This</u> includes shared ownership, relevant equity loans, other low cost homes for sale (at a price equivalent to at least 20% below local market value) and rent to buy (which includes a period of intermediate rent).</p>
<b>AM412</b>	<b>280</b>		<b>Agent of Change pPrinciple</b> The principle places the responsibility <del>of</del> <u>for</u> mitigating the impact of nuisances (including noise) from existing nuisance-generating uses upon proposed new development.
<b>AM413</b>	<b>281</b>	<b>NEW</b>	<b>Audience Spectrum Data-</b> <u>Audience Spectrum is a population profiling tool which describes attendance, participation and engagement with the arts, museums and heritage, as well as behaviours, attitudes and preferences towards such organisations.</u>
<b>AM414</b>	<b>284</b>	<b>NEW</b>	<b>Enjoy Waltham Forest -</b> <u>A programme to reduce our dependency on cars in favour of increased walking, cycling and public transport, using funding from various sources to tackle key issues surrounding road safety, air quality and public health.</u>
<b>AM415</b>	<b>285</b>	<b>NEW</b>	<b>Exemplar Design-</b> <u>Waltham Forest's underlying approach to ensuring that all new development in the borough delivers the highest architectural and design quality that responds positively to the existing character and context of the local area. Exemplar Design is expected to be sustainable and inclusive, and to achieve community safety, good health outcomes, neighbourliness and resource efficiency.</u>
<b>AM416</b>	<b>289</b>	<b>NEW</b>	<b>Plan Period -</b> <u>This is the time frame the Local Plan covers. This Plan covers the period 2020-2035.</u>

AM417	290		<p><del>Secured by Design</del>—police flagship initiative supporting the principles of designing out crime; e.g. windows and doors that carry secured by design approval and have been assessed to provide a high degree of resistance to break-ins</p> <p><u>Secured by Design - A crime prevention initiative operated by the Police Service to guide and encourage those engaged within the specification, design and build of new homes and other properties, including refurbishments to adopt crime prevention measures. Design Guides published on the SBD website cover a range of building sectors, including residential, education, health, transport and commercial and provide a valuable source of reference to architects, developers, self-builders, local authority planners and police officers.</u></p>
AM418	292	NEW	<p><u><b>Suitable Alternative Natural Greenspaces (SANGs)</b>- Sustainable Alternative Natural Greenspaces or SANGs are areas that are designated with the aim of protecting a Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) or Special Areas of Conservation (SAC) from recreational pressures by providing alternative green space to attract people away from the sites that need protecting.</u></p>