



**Shaping the Borough
Waltham Forest Local Plan (LP2) Pre-Submission
Site Allocations Document (Regulation 19)
Sustainability Appraisal Report**



Waltham Forest

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1 Introduction

1.1 Background

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

The Council's Local Plan is being produced in two parts. Part 1 of the Local Plan is the overarching strategic policy document and the Site Allocations Document represents Part 2 of the Local Plan. The Local Plan Part 1 (LP1) contains policies which set out the level of growth to be delivered over the plan period, a spatial strategy including strategic development locations and development management policies. LP1 was submitted to the Secretary of State for Examination in May 2021. The Site Allocations Document (LP2) sits underneath the Local Plan Part 1 in the development plan hierarchy. It presents proposed site allocations which will deliver the growth set out within LP1.

This document relates to the Regulation 19 (second draft) LP2 which allocates sites where the Council considers development could come forward and sets out the parameters in which these sites should be redeveloped and brought forward.

The Council has aspirations for growth, including significant new housing and sustained economic growth, to provide jobs for local people and increase the supply of housing, including affordable units. The Waltham Forest Local Plan Part 1 sets targets to deliver 27,000 additional homes and 52,000sqm of employment floorspace in Waltham Forest by 2035. This growth will be focussed in three distinct areas: the South, Central and the North of the borough.

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

SA assesses the significant environmental, social and economic effects of the Local Plan, the "reasonable" alternatives to the Plan's strategy, policies and proposals; and the reasons for discounting alternatives. It also incorporates a process called Strategic Environmental Assessment (SEA). SA of Local Plans is required under Section 19 of the Planning and Compulsory Purchase Act 2004. The National Planning Policy Framework (July 2021) also requires SA of Local Plans.

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



Sites across the borough were selected to be included in the GLA Strategic Housing Land Availability Assessment to support the new London Plan. In addition, the Council carried out a Call for Sites in 2017 as part of the Direction of Travel Local Plan consultation. Once the London Plan set out the borough's new housing target the Council undertook further work to understand how it could be delivered and commissioned a Growth Capacity Study in 2018 which included a further "Call for Sites". A final "Call for Sites" was held as part of the Regulation 18 Draft Local Plan consultation in 2019. Some initial consultation was run with community groups on proposed sites in January 2020. A Regulation 18 version of the Site Allocations Document (LP2) was undertaken between December and January 2020. Since then, consultation comments have been responded to and a second iteration of LP2 prepared. This SA Report for the Site Allocations Document has been updated and sits alongside the Pre-Submission Site Allocations Document Regulation 19 (second draft) version of the Shaping the Borough, Waltham Forest Local Plan (LP2).

1.2 This document

This document is the SA Report for the Shaping the Borough, Waltham Forest Local Plan (LP2) Pre-Submission Site Allocations Document (Regulation 19).

The remaining sections of this document are structured as follows:

- **Section 2 Methodology** describes the approach to the SA;
- **Section 3 The Scope and Content of the draft Site Allocations Document** and sets out its vision and objectives
- **Section 4 Review of Other Programmes and Plans** describes how the context of SA. This section is supported by Appendix B;
- **Section 5: Summary of Baseline Data** including key sustainability issues, data gaps and future evolution of the baseline. This section is supported by Appendix A;
- **Section 6 Alternatives** describes the alternatives identified and assessed, the findings of the assessment of alternatives and the reasons for choosing the proposed site allocations;
- **Section 7 Results of the assessment of the draft Site Allocations Document** presents the potential significant effects of the Site Allocations Draft Local Plan. This section is supported by Appendix C;
- **Section 8 Potential Cumulative Effects** describes cumulative effects which may arise from development of the proposed site allocations, the local plans of neighbouring boroughs, as well as projects occurring in and around Waltham Forest.
- **Section 9 Mitigation** presents the measures put forward to offset potential significant negative and uncertain effects of the proposed site allocation; and
- **Section 11 Next Steps** sets out the next activities in the SA and Site Allocations Document.

1.3 Sustainability Appraisal and Strategic Environmental Assessment

SA of Local Plans is required under sections 19 of the Planning and Compulsory Purchase Act 2004. The National Planning Policy Framework (July 2021) also requires SA of Local Plans. The SA must incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations). The SEA Regulations transpose the SEA Directive (2001/42/EC) into English law and applies to a range of plans and programmes, including Local Plans. The SEA Directive aims at a high level of protection of the environment, and to integrate the consideration of the environment into the preparation and adoption of plans and with a view to promoting sustainable development.

Within the context of local planning in England, it is accepted practice to integrate the requirements of SA and SEA into a single assessment process, as set out in the Planning Practice Guidance¹ (updated 2020). The purpose of SA is to appraise the environmental, social and economic effects of plans and programmes. The SA 'testing' of the site allocations and their reasonable alternatives will help to develop the most sustainable policies and proposals as an integral part of the plan's development.

1.4 Habitats Regulations Assessment

In the UK, the Habitats Directive (92/43/EEC) has been transposed into domestic legislation as the Habitats Regulations 2017 which requires an assessment of any plans which are likely to have a significant effect on any protected European sites, i.e. Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar wetland sites. This is commonly referred to as a Habitats Regulations Assessment (HRA). This requirement includes strategic plans with an impact on land use.

An HRA of the draft Site Allocations Document has been undertaken. The proposed site allocations have been screened for Likely Significant Effects (LSEs) on European sites.

Natural England confirmed in an email on 12th August 2020² that the two European sites which need consideration in the HRA of the Site Allocations Document are:

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

The findings of the screening exercise have been incorporated into the SA of the proposed site allocations and this is reflected in the findings of the assessment presented in Section 7 of this report. Following screening, the next stage of HRA (Appropriate Assessment) has been undertaken. This is closely related to the parallel HRA of the Waltham Forest LP1. The HRA of LP1 is addressing potential strategic impacts from growth within Waltham Forest and surrounding areas. The HRA of the Site Allocations Document is in line with the LP1 HRA and addresses more localised potential effects of individual site locations, such as whether new residents of a site could access Epping Forest SAC for recreation or whether the development

¹ <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

² Email from Natural England dated 12/08/20



of certain sites could increase risks of urbanisation effects such as fly-tipping on either European site.

An HRA report for the Site Allocations Document has been prepared and will be consulted on during the Site Allocations Document Regulation 19 consultation period. The findings of the Appropriate Assessment stage of the HRA have been incorporated into the SA.

1.5 How to comment on this document

This report is being consulted on with the public and statutory consultees³ in order to provide information in support of the consultation on the Draft Site Allocations Document (Regulation 18) and to confirm that it provides sufficient information to ensure that a robust and legally compliant SA is being carried out. Other interested parties are also being notified and the document will be also available on the Council's website.

The consultation period on the Draft Site Allocations Document is from 8th November 2021 until 14th January 2022. We welcome your views on this SA Report during this period. A series of questions are set out below in order to guide responses.

Questions to guide responses:

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

How to comment:

Please provide responses by **5pm 14th January 2022** to:

Planning Policy Team
The London Borough of Waltham Forest
2nd Floor West
Waltham Forest Town Hall
Forest Road, London
E17 7JF

³ Environment Agency, Historic England and Natural England.

2 Approach to the SA

2.1 SA process and requirements

The SA process is shown in Figure 1. Stage A, Scoping, was completed in March 2020.

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

- Evaluate the potential effects of the Site Allocations Document implementation
- Identify and propose mitigation of significant adverse effects
- Propose appropriate monitoring of significant effects

Figure 1: The SA Process

Local Plan Stage 1: Pre-production - Evidence Gathering	SA Stages and Tasks
	Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope <i>A1: Identifying other relevant policies, plans and programmes, and sustainability objectives</i> <i>A2: Collecting baseline information</i> <i>A3: Identifying sustainability issues and problems</i> <i>A4: Developing the SA Assessment framework</i> <i>A5: Consulting on the scope of the SA</i>
Local Plan Stage 2: Production	SA Stages and Tasks
	Stage B: Developing and refining options and assessing effects <i>B1: Testing the plan objectives against the SA assessment framework</i> <i>B2: Developing the plan options and preparing an Initial or draft IIA Report (not a statutory report)</i> <i>B3: Predicting the effects of the plan and its alternatives</i> <i>B4: Evaluating the effects of the plan and its alternatives</i> <i>B5: Considering ways of mitigating adverse effects and maximising beneficial effects</i> <i>B6: Proposing measures to monitor significant effects of implementing local plans</i>
	Stage C: Preparing the formal SA Report <i>C1: Preparing the formal SA Report</i>
	Stage D: Consulting on the preferred options of the Local Plan and SA Report <i>D1: Public participation on the preferred options of the Local Plan and the SA Report</i> <i>D2(i): Appraising significant changes</i>
Local Plan Stage 3: Examination	SA Stages and Tasks
	D2 (ii): Appraising significant changes resulting from representations
Local Plan Stage 4: Adoption and monitoring	SA Stages and Tasks
	D3: Making decisions and providing information
	Stage E: Monitoring the significant effects of implementing the Local Plan <i>E1: Finalising aims and methods for monitoring</i> <i>E2: Responding to adverse effects</i>

2.2 Stage A: Scoping

The first stage (Stage A) of the SA process involved consultation on a SA Scoping Report which has been completed. In the SA Scoping Report, the topics set out within the SEA Regulations have been expanded into a number of sustainability topics as presented within Table 1 to include socio-economic topics as well as environmental. The SA topics are the same as those used in the SA of the Local Plan Part 1.

Table 1: SA Topics Compared with SEA topics

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

An SA Scoping Report for the Site Allocations Document was consulted on with the statutory consultees⁴ to confirm that it provides sufficient information to ensure that a robust and legally compliant SA is carried out. The scoping report was consulted on for five weeks with statutory consultees between 18 March 2020 to 23 April 2020. Comments were received from the three statutory consultees and amendments have been made to the Scoping Report and the SA Framework in response. A Post-Consultation version of the Scoping Report was published in August 2020 on the Council's website.

The Scoping Report presents baseline information on the environmental, social and economic characteristics of the plan area, including the likely evolution of the baseline within the plan period. The Scoping Report sets out a framework (called the 'SA Framework') for the assessment of the plan and its alternatives, identifying the significant effects that the assessment will need to focus on. The SA Framework is based on that being used in the SA of the Local Plan Part 1 but with objectives relating to crime, waste, energy and distinctiveness scoped out as these relate to design issues which are not within the remit of the Site Allocations Document. The final version of the SA Framework of the Site Allocations Document SA is shown in [Table 2](#).

⁴ Natural England, Historic England and the Environment Agency



In summary, the changes made to the SA Scoping Report following consultation are as follows:

- To place greater emphasis on archaeological heritage;
- To include additional documents in Table 3.7 Appendix A relating to cultural heritage;
- To revise some of the policy documents reviewed in Appendix A;
- Amend reference to the flood defence for the River Lee and clearer reference has been made to the management of existing flood defences and the creation of new defences including buffer zones alongside main rivers;
- Update the Water Framework Directive river waterbodies data;
- To strengthen the wording for the need for development to achieve biodiversity net gain;
- To further highlight how the natural environment can deliver measures to reduce the risk of climate change e.g. through green infrastructure and resilient ecological networks;
- The need for development to contribute to improving the status of waterbodies to achieve 'Good Overall Status', such as though installing rain planters and planting reed beds has been added to the key sustainability issues relating to water quality; and
- Include retrofitting of existing developments with SUDS systems, as well as requiring it for new developments, in the key sustainability issues.

Table 2: SA Framework Objectives

SA Objective	Description	Key Sustainability Issues
Social		
SA1	Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	<ul style="list-style-type: none"> • As the population continues to increase so does the demand for housing, infrastructure and facilities • The population density within the borough exceeds both the London and the national averages • There is a need to create high quality places to live, work and recreate that are mixed and well-balanced in terms of tenure and income • Promote high quality housing with a range of tenures to reduce health issues which arise from poor quality accommodation • There is a disparity between the cost of housing and the amount that people are able to borrow to purchase a home, which means that many people are unable to access the property market • There is a shortfall in the provision of affordable housing to meet the requirements of those in housing need • There is a potential shortfall in the provision of family accommodation and there is overcrowding, primarily in the private rental sector • Homelessness is expected to increase • Need to offer greater quality, flexibility and choice to those who rent. • There is a need to increase the supply of well-designed housing of all tenures • Need to introduce more flexible approaches for affordable housing contributions to encourage open market and mixed tenure specialist older people's housing.
SA2	Improve standard of health and wellbeing of those who live and work in the Borough	<ul style="list-style-type: none"> • Currently a large proportion of the population are aged over 50 and this is projected to rise over the next 20 years (+26% rise by 2021) • Improve life expectancies through promoting healthy lifestyles for all ages • Need to ensure adequate access to green spaces and recreational facilities to promote active and healthy lifestyles • Need to increase recognition of the growing evidence of a relationship between physical and mental health • Need to ensure that hospitals have fit for purpose facilities (i.e. less converted houses) that meet the needs of patients • Need to increase levels of active travel throughout the borough in order to increase physical activity levels and tackle poor air quality • Childhood obesity rates are higher within Waltham Forest than both regionally and nationally • TB remains a disease which is of high prevalence within the borough • There is a need to protect open space of varying types, which is used heavily by residents of the borough. For example, allotment space

SA Objective	Description	Key Sustainability Issues
SA3	Improve community cohesion and reduce inequalities through the provision of community facilities to meet local cultural, educational, recreational and social needs	<ul style="list-style-type: none"> • There are inequalities in health and life expectancy between ethnic groups • Disparities between wards, particularly between the north and south of the borough • Need to provide inclusive services; promote equal opportunities; oppose discrimination, intolerance and disadvantage through reducing inequalities and promoting community cohesion • Help to support development of successful neighbourhoods • There is a need to create high quality places to live, work and recreate that are mixed and well-balanced in terms of tenure and income • There is a need to protect open space of varying types, which is used heavily by residents of the borough. For example, allotment space • Adequate support and facilities for older residents, including independent living, has been noted in particular to be needed • Need to build on borough's arts, culture and sport strengths across the borough's diverse and changing population • Need to reduce the number of older people who feel socially isolated, by getting them actively participating in community life • Currently a large proportion of the population are aged over 50 and this is projected to rise over the next 20 years (+26% rise by 2021) • Need to ensure that growth supports the delivery of vital infrastructure and new facilities across the borough • Help to support development of successful neighbourhoods • Need to ensure that all residents have access to training and skills development to enable them to access and progress into high quality employment.
Environmental		
SA4	Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system, reducing car use for all journey lengths	<ul style="list-style-type: none"> • Continual growth in car ownership will contribute to further air pollution, and associated impacts on climate, human health and biodiversity • Need to work towards improving air quality and reducing noise impacts from transport • There is a need to make public transport more accessible in some areas of the borough • There is a need to promote walking and cycling (building on Enjoy Waltham Forest ("Mini Holland") programmes) for local journeys in place of travel by private car. There should also be a focus on promoting public transport use instead of cars for medium and longer journeys • There is a need to reduce car parking spaces in order to discourage private car use and improve air quality • One in five journeys each weekday morning and afternoon involves trips to school, even though most journeys to schools are under a mile. There is a need to reduce school journeys by reducing Drop Off/Pick Up arrangements for new school developments, and encouraging sustainable, active travel amongst school pupils

SA Objective	Description	Key Sustainability Issues
		<ul style="list-style-type: none"> • As the population grows, so does the need to change current infrastructure to meet the demands of all residents whilst making it future proof • Need to ensure that growth supports the delivery of vital infrastructure and new facilities across the borough • Need to provide public transport capacity and safeguard land for transport • Help to enhance London's transport connectivity • Improvements to road safety are needed to reduce casualties • Need to make cycle parking safe and easy to use • There is a need to provide electric vehicle infrastructure, such as charging points.
SA5	Reduce greenhouse gas emissions and promote low carbon growth	<ul style="list-style-type: none"> • Greenhouse gas emissions need to be stabilised and reduced over time • Help promote low carbon heat network • Need to identify opportunities for growth of the low carbon economy in the Upper Lee Valley • There is a need to provide electric vehicle infrastructure, such as charging points.
SA6	Improve air quality	<ul style="list-style-type: none"> • Continual growth in car ownership will contribute further air pollution • Reliance on the petrol or diesel-fuelled private car as the main mode of transport • Air pollution from the strategic road network is an issue across the borough and NO₂ emissions are remaining constant, not decreasing as predicted • Increasing use of biofuels (biodiesel and biomass) for heating schemes will cause further air quality issues • Need to help reduce pollution from road vehicles, buildings, industry and construction • Need to improve efficacy of measures within the AQMA • There is a need to provide electric vehicle infrastructure, such as charging points.
SA7	Improve water quality in rivers and groundwater and ensure the efficient use of water resources	<ul style="list-style-type: none"> • Diffuse urban water pollution exists in local rivers and water bodies • There should be no deterioration in the health and quality of existing water bodies and development should improve the status of water bodies to achieve 'Good Overall Status in accordance with the Water Framework Directive', such as through installing rain planters and reed beds • Increasing population will put strain on water resources • New development will need to allow for an 8 metre buffer zone on both sides of a main river to allow access to the flood defences for maintenance or essential remedial work as well as promoting green and blue infrastructure links, water quality and human health • Potential impacts of the Local Plan policies and site allocations on groundwater need to be identified and addressed.
SA8	Reduce the risk of flooding and improve resilience to climate change	<ul style="list-style-type: none"> • High number of properties at risk of flooding and there is a need to promote the construction of new flood resilience and resilience measures for existing and future properties to ensure they are resilient to the future effect of climate change and protected against future flood risk. <u>In response to this risk proposals have been developed for Critical Drainage Areas.</u>

SA Objective	Description	Key Sustainability Issues
		<ul style="list-style-type: none"> • Natural flood management techniques should be promoted • New development will need to incorporate SUDS to sustainably reduce flood risk and there is a need to encourage the retrofitting of existing developments with SUD systems • Ensure that existing flood defences are maintained responsibly by the riparian owner and for remedial works to be carried out where necessary • Need to promote the use of new technologies and innovation in flood mitigation measures • There will be an increasing need to plan for and implement/facilitate climate change adaptation, in respect of rising temperatures, water scarcity and extreme weather events, particularly heavy rainfall/flooding • There is a need to plan and prepare for the expected impacts of unavoidable climate change by developing adaptation responses and building resilience • New developments need to minimise vulnerability and provide resilience to climate change • There is a need to work with communities to help tackle climate change • No action has yet been taken to address the significant flood risk posed by Dagenham Brook, to both residential and commercial properties • Climate changes could interact with increased development to create more flooding events of a higher severity throughout the borough. Waltham Forest needs to be prepared and ready to respond to such events
SA9	Ensure the efficient use of land and buildings and protect soil quality and geological resources	<ul style="list-style-type: none"> • There is finite availability of previously developed land for development; this may result in the use of greenfield land in the future • There is a need to protect soils and the important ecosystem services they provide – particularly during construction and development • Need to protect designated geological sites.
SA10	Conserve and enhance biodiversity and the natural environment, improving resilience to climate change	<ul style="list-style-type: none"> • Support is needed to achieve local BAP targets • Need to promote effective land-management to support, protect and enhance biodiversity • Increases in population will cause a demand for more development, where there is a potential for loss of valuable habitats which have yet to be designated for nature conservation as a direct result • Consider and plan for the impacts of climate change on species and habitats • There is a need to help encourage people to engage with the ownership, design, management, maintenance and use of their environment as part of their own vision for their neighbourhood • Need to recognise the wider benefits of ecosystem services and manage impacts on biodiversity • Increase awareness that green infrastructure and resilient ecological networks play an important role in aiding climate change adaptation and resilience • Seek to enhance green infrastructure networks within the borough

SA Objective	Description	Key Sustainability Issues
		<ul style="list-style-type: none"> • Ensure current ecological networks are not compromised, and future improvements in habitat connectivity are not prejudiced • In line with NPPF paragraph 174, new development should achieve biodiversity net-gain in a hierarchical approach with on-site net-gain being preferred and off-site compensation as a last resort • Need to work to conserve and enhance the local environment.
Economic		
SA11	Protect the ecological integrity of SSSI and Natura 2000 sites	<ul style="list-style-type: none"> • Large areas of the SSSI sites are considered to be in either unfavourable with no change or to be in an unfavourable and declining condition • SSSIs and European sites within the borough are under threat from poor air quality, recreational pressure and urban effects (including issues with litter) • Need to protect and enhance the wildlife and habitats in Waltham Forest, in particular those of international, national and regional importance.
SA12	Maintain and enhance the quality of the green belt and open space areas	<ul style="list-style-type: none"> • Large areas of open space are Metropolitan Green Belt. There is a need to protect these areas of open space from development pressure • There is a need to protect open space of varying types, which is used heavily by residents of the borough. For example, allotment space.
SA13	Conserve and enhance the historic environment	<ul style="list-style-type: none"> • A number of listed buildings are identified as being in poor condition and are have been included on Historic England's Heritage at Risk Register. Opportunities exist to improve the condition of some listed buildings through development • The borough contains 20 Archaeological Priority Areas where there is significant known archaeological interest or potential for new discoveries • Ensure that the Conservation Areas, Heritage Assets (including archaeology) and features are preserved or enhanced • New developments should respect the urban and historic context, improve townscape and leave a positive architectural legacy • Impacts of future development on the local historic environment need to be considered • Heritage assets should be managed to sustain their significance • Ensure that everyone is able to participate in understanding and sustaining their local historic environment • Development could encroach on Conservation Areas and subsequently negatively affect townscape and heritage assets.

SA Objective	Description	Key Sustainability Issues
SA14	Maintain and enhance the vitality and viability of the borough's town centres	<ul style="list-style-type: none"> • Further action is needed in order to support and promote retail, business, cultural, leisure and residential investment in town centres • Support is required for the creation of the Creative Enterprise Zone around Blackhorse Lane.
SA15	Improve the local economy by enabling employment developments in appropriate places	<ul style="list-style-type: none"> • Lower than average salaries could affect the borough's ability to attract inward investment • Continue to support the Upper Lee Valley Development Opportunity Area and celebrate its industrial heritage • There are likely to be ongoing pressures on industrial sites, need to maintain industrial uses and promote strong local base of small businesses • Need to provide additional workspaces and promote denser, mixed use development with no net loss of business floor space.
SA16	Maintain stable levels of employment in the Borough	<ul style="list-style-type: none"> • Skills development in growth areas is also needed both for those who are currently unemployed or underemployed • Encourage and promote flexible working arrangements for residents to support people when gaining skills and moving into employment • Investment is needed so that local people have the skills and ability to seize local growth opportunities and they are able to access and progress into high-quality, better paid employment in the borough • There are large inequalities in employment and skill levels. between wards within the borough. Need to ensure that regeneration is inclusive • Ensure that ongoing business growth becomes a driver of productivity and fairer wages (e.g. encouraging the London Living Wage), in order to create an increase in the overall prosperity of the Waltham Forest Borough • There is a need to create fair employment and good work for all • In work support is needed to ensure sustainment of jobs, professional development and progression into better paid, secure higher quality jobs • Need to promote employment, training programmes and sector-based initiatives in the growth of skills to support creative and digital industries, construction and facilities management, retail and hospitality, and finance and business services.

2.3 Stage B: Alternative Options assessment

The alternative options considered include the following:

- Six strategic spatial options (Local Plan Part 1 Direction of Travel, 2017);
- A preferred spatial strategy option and an alternative spatial strategy in 2018 (reported within the Local Plan Part 1 SA Report (October 2019);
- In the Regulation 18 version of the Site Allocations Document (LP2) undertaken in 2020 22 alternative sites were identified by the council as having the potential to come forward if they became available and deliverable in the future and were assessed as alternatives alongside the proposed allocation sites. The alternative sites were assessed alongside the proposed site allocations to the same level of detail as the proposed allocation sites.

Eight of these alternative sites have now been chosen by the council as proposed allocation sites and are now being taken forward in the Regulation 19 LP2. The reasons for choosing and rejecting the alternatives sites are discussed in Section 6.

2.4 Stage C: Sites Assessment and Producing the SA Report

The Regulation 19 Site Allocations Document (LP2) allocates sites where the Council considers development could come forward and sets out the parameters in which these sites should be redeveloped and brought forward. For this document Stage C has involved another iteration of the sites assessments undertaken previously for the Regulation 18 Site Allocations Document taking into account the following changes:

- Site details changes to 11 of the sites in relation to changes to boundaries or to the proposed use of the site;
- Deletion of one site due to the developable area being too small;
- Eight alternative sites which were considered as alternatives at the Regulation 18 stage have been selected for inclusion in the Regulation 19 Site Allocations Document;
- Five new alternative sites identified for assessment and selected for inclusion in the Regulation 19 Site Allocations Document; and
- Amendments to site allocation policies to address mitigation and enhancement measures put forward in the SA at the Regulation 18 stage.

This stage of the SA involves identifying the significant environmental effects of the Site Allocations Document including short, medium and long term; permanent and temporary; positive and negative effects taking into account the changes listed above and documenting the SA process and presenting the findings within an SA Report. All new site allocation alternatives have been assessed against the SA Framework ([Table 2](#)) and reference has been made to the baseline data and key sustainability issues in the borough identified during the scoping stage.

Significance criteria set out in [Table 4](#) have been used to determine the potential sustainable performance of the policies.

Within the Site Allocation Document, sites for strategic future development have been identified within the three distinct areas of the Borough: the South, Central and the North of the borough, along with sites which may be required for the delivery of essential infrastructure to support growth. In total, 91 sites have been assessed, 75 of which are strategic allocations and a further 16 alternative sites were also assessed – see explanation above. For the Regulation 19 Site Allocations Document (LP2) a further five new sites have been identified for inclusion in this document.

A GIS layer was provided to the SA consultants in 2020 during the Regulation 18 stage detailing the location, size and shape of each site, along with information regarding the potential housing yield, site PTAL score and anticipated non-residential development. It should be noted that at that stage not all sites assessed had the same level of information available, for example, details of non-residential space to be provided. The assessment of these sites needed to consider site characteristics and location. This also needed to be done in a consistent manner, ensuring a 'level playing field'. In this case, time and resource limitation meant there was limited potential to generate data for all site options through site visits and/or discussions with site promoters. Available data was used to inform the assessment of each site against the SA Framework.

In 2021, the assessments of site allocations has been updated using the information presented within the Regulation 19 LP2 document. An updated spreadsheet of details was not made available at this time for the consultants but more consistent information on each allocation was provided within the LP2 document. In some regards, less details were provided in relation to each site allocation at the Regulation 19 stage compared with the Regulation 18 stage, for example, the amount of car parking some sites might provide has not been prescribed at the Regulation 19 stage and it is assumed that this will be dealt with on a case by case basis in accordance with Local Plan Part 1 policies, which promotes car-free developments unless in special circumstances which can be justified by developers. The five new sites introduced at the Regulation 19 stage have been assessed to the same level of detail as the other site allocations.

GIS analysis was not appropriate to support the assessment against the following SA objectives:

- SA1: Meet local housing needs through the provision of a range of tenures and sizes of new dwellings; and
- SA16: Maintain stable levels of employment in the borough.

This is because these SA objectives are not spatial i.e. whether a site could contribute to the achievement of these SA objectives does not relate to its location. However, non-spatial data was used to inform the RAG scoring of these SA objectives e.g. % of affordable housing a site is expected to deliver.

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



The RAG ratings (see Appendix C) then informed the assessment of site allocations against the SA framework. This approach is considered to be a robust and efficient method of integrating GIS into the SA assessment against the SA Framework.

Table 3: RAG Criteria

SA Objective	Indicator	RAG Criteria	Justification
SA1: Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	Could we use the housing data sent through? It shows affordable housing and market housing estimates, as well as the number of bedrooms estimates.	No affordable housing provision <49% affordable housing provision >50% affordable housing	Local Plan Part 1, Policy 24: Delivering genuinely affordable housing stipulates that 50% of new housing should be affordable homes
SA2: Improve standard of health and wellbeing of those who live and work in the Borough	Proximity to a GPs/Health centre	>800m 400-800m <400m	CIHT Planning for Walking Guidelines, 2015 ⁵
	Proximity to formal recreational facilities	>800m 400-800m <400m	CIHT Planning for Walking Guidelines, 2015 ⁶
	Proximity to informal recreational facilities	>800m 400-800m <400m	CIHT Planning for Walking Guidelines, 2015 ⁶
SA3: Improve community cohesion and reduce inequalities through the provision of community facilities to meet local, cultural, educational, recreational and social needs	Proximity to a Town, Local, Neighbourhood or District Centres	>0.8km walking distance <0.8km walking distance <0.4km walking distance <0.2km walking distance	CIHT Planning for Walking Guidelines, 2015 ⁶
	Proximity to a primary school	>3.2km <3.2km <1km	Home to School Transport and Travel Guidance, 2014 ⁶
	Proximity to a secondary school	>4.8km <4.8km <1km	Home to School Transport and Travel Guidance, 2014 ⁷

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

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

SA Objective	Indicator	RAG Criteria	Justification
	Proximity to a community centre	>800m 400-800m <400m	CIHT Planning for Walking Guidelines, 2015 ⁶
	Proximity to a place of worship	>800m 400-800m <400m	CIHT Planning for Walking Guidelines, 2015 ⁶
	Proximity to a shopping frontage	>800m 400-800m <400m	CIHT Planning for Walking Guidelines, 2015 ⁶
	Proximity to formal recreation facilities	>800m 400-800m <400m	CIHT Planning for Walking Guidelines, 2015 ⁶
	Proximity to informal recreational facilities	>800m 400-800m <400m	CIHT Planning for Walking Guidelines, 2015 ⁶
SA4: Improve opportunities for access to local services, facilities and employment through and integrated sustainable transport system, reducing car use for all journey lengths	Proximity to a bus stop	>400m <400m	CIHT Planning for Walking Guidelines, 2015 ⁶
	Proximity to a train/tube station	>800m <800m	CIHT Planning for Walking Guidelines, 2015 ⁶
	Proximity to an employment area	>800m 400-800m <400m	CIHT Planning for Walking Guidelines, 2015 ⁶
	PTAL Score	0-2 3-4 5-6B	TfL, Assessing Transport Connectivity in London, 2015 ⁷

⁷ Transport for London, Assessing Transport Connectivity in London, 2015

SA Objective	Indicator	RAG Criteria	Justification
SA5: Reduce greenhouse gas emissions and promote low carbon growth	Proximity to heat network	In existing network or proposed heat network Within Heat network priority areas Not within a heat network	https://maps.london.gov.uk/heatmap
	Proximity to electric charging points	On site Within 600m of public one More than 600m from	Professional judgement, including consideration of LP Part 1 policies Use zap map to locate https://www.zap-map.com/live/
SA6: Improve air quality	Proximity to a bus stop	>400m <400m	CIHT Planning for Walking Guidelines, 2015 ⁶
	Proximity to a train/tube station	>800m <800m	CIHT Planning for Walking Guidelines, 2015 ⁶
	PTAL Score	0-2 3-4 5-6B	TfL, Assessing Transport Connectivity in London, 2015 ⁸
	Ultra Low Emission Zone (ULEZ) expansion	Outside ULEZ Within ULEZ	Professional judgement
SA7: Improve water quality in rivers and groundwater and ensure the efficient use of water resources	Proximity to water courses	<10m 10-1000m >1000m	Cirra Environmental Good Practice on Site (Third Edition), 2010
	Groundwater source protection zone	Zone 1 Zones 2&3 Not within a protection zone	Environment Agency ⁸

⁸ <https://data.gov.uk/dataset/09889a48-0439-4bbe-8f2a-87bba26fbbf5/source-protection-zones-merged>

SA Objective	Indicator	RAG Criteria	Justification
SA8: Reduce the risk of flooding and improve resilience to climate change	Groundwater flooding zone	>75% 25-75% <25%	Environment Agency: Areas Susceptible to Groundwater Flooding Guidance ⁹
	Flood Zone	Zone 3 Zone 2 Zone 1	Environment Agency Guidance ¹⁰
SA9: Ensure the efficient use of land and buildings and protect soil quality and geological resources	Previously developed land?	No Part Yes	RTPI Practice Advice, 2017
	LIGs	LIG within or partially within site Adjacent to No LIG on or adjacent to site	Guide to London's Geodiversity Sites, London Geodiversity Partnership, 2017 ¹¹
SA10: Conserve and enhance biodiversity and the natural environment, improving resilience to climate change	Priority habitat and Local Nature Reserve	Includes or is adjacent <50m >50m	Professional judgement
SA11: Protect the ecological integrity of	Proximity to a SSSI Impact Risk Zone	Within a zone and development is over residential threshold	Natural England ¹²

⁹ Environment Agency Guidance, Areas Susceptible to Groundwater Flooding, 2010

¹⁰ Environment Agency, Flood risk Assessment: Local Planning Authorities Guidance <https://www.gov.uk/guidance/flood-risk-assessment-local-planning-authorities>

¹¹ Guide to London's Geodiversity Sites, London Geodiversity Partnership, 2017 https://www.google.com/maps/d/viewer?mid=116TfiykkXv8C31ZA2SiK-R_wP60&hl=en_US&ll=51.62502806356296%2C0.002624996484428266&z=14

¹² Natural England SSSI Impact Risk Zones https://naturalengland-defra.opendata.arcgis.com/datasets/dd6ff0bd464e42fea19f289423a1d22a_0

SA Objective	Indicator	RAG Criteria	Justification
SSSI and Natura 2000 sites		If in zone, and development is under the residential threshold or no residential development currently identified for that site Not within a SSSI impact zone	
	Recreational effects on Lee Valley SPA and Ramsar	Immediately adjacent to Not immediately adjacent to	Advised by Natural England by email dated 2 nd July 2020
	Recreational effects on Epping Forest SAC	<6.7km from Epping Forest SAC boundary >6.7km from Epping Forest SAC boundary	Based on the Waltham Forest Local Plan Draft Habitats Regulations Assessment Report (ClearLead Consulting, April 2020) and HRA expert judgement
	Urbanisation effects on Epping Forest SAC	<500m from Epping Forest SAC boundary > 500m from Epping Forest SAC boundary	Based on the Waltham Forest Local Plan Draft Habitats Regulations Assessment Report (ClearLead Consulting, April 2020) and HRA expert judgement
SA12: Maintain and enhance the quality of green belt and open space areas	Green Belt	Yes Part No	Policies 17 and 84 of the LBWF Draft Local Plan July 2019 protect MOL and Green Belt.
	Metropolitan Open Land		Policies G2 and G3 of the emerging London Plan 'Intend to Publish Version December 2019' protect London's Green Belt and MOL.
SA13: Conserve and enhance the historic environment	Conservation Area	Intersects or is adjacent <50m >50m	It is appropriate to 'flag' a site red where a site is within, intersects or is adjacent to a Conservation Area or Listed Building. It is also appropriate to flag sites that might more widely impact on the setting of a Conservation Area or Listed Building and a 50m threshold has been assumed. It is recognised that distance in itself is not a definitive guide to the likelihood or significance of effects on a heritage asset.
	Listed Buildings	Intersects or is adjacent <50m >50m	

SA Objective	Indicator	RAG Criteria	Justification
			It is also recognised that the historic environment encompasses more than just designated heritage assets.
	Locally listed buildings	Locally listed building on site No locally listed building on site	The Council will seek to retain buildings included on its local list of buildings of architectural/historic interest and encourage their sympathetic maintenance and enhancement. Alterations or extensions to locally listed buildings will be expected to achieve a high standard of design ¹³ .
	Proximity to a historic park or garden	<10m <25m >25m	RTPI Practice Advice 2019
	Archaeological priority zone	In Out	Historic England ¹⁴
SA14: Maintain and enhance the vitality and viability of the Borough's town centres	Town Centres (Walthamstow or District Centres)	>0.8km walking distance <0.8km walking distance <0.4km walking distance	CIHT Planning for Walking Guidelines, 2015 ⁶
SA15: Improve the local economy by enabling employment developments in appropriate places	Borough Employment Areas	>800m 400-800m <400m	CIHT Planning for Walking Guidelines, 2015 ⁶
	Strategic Industrial Locations (SIL)	No Yes	Professional judgement/London Plan Policy E5 of the emerging London Plan 'Intend to Publish Version December 2019' protects Strategic Industrial Locations (SILs) and within Policy SD1 Opportunity Areas.

¹³ London Borough of Waltham Forest Council website <https://www.walthamforest.gov.uk/content/conservation-areas-and-listed-buildings>

¹⁴ Greater London Archaeological Priority Areas <https://historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/greater-london-archaeological-priority-areas/>

SA Objective	Indicator	RAG Criteria	Justification
SA16: Maintain stable levels of employment in the Borough	PTAL Score	0-2 3-4 5-6B	TfL, Assessing Transport Connectivity in London, 2015 ⁸

The findings of the draft sites assessment are summarised in Section 7 and detailed assessment tables are presented in Appendix C.

Table 4: Significance definitions for SA

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

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

2.5 Assumptions and Limitations

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

Baseline data has been available across the Borough however there are cases where data gaps have been identified. This have been listed for each topic area in Section 5 of this report, Summary of Baseline Data. The baseline data was gathered between January and March 2020 and was considered up to date when published following consultation in August 2020.

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

Every effort is made to predict effects accurately; however, this is inherently challenging given limited understanding of precisely how the Site Allocations Document and Local Plan Part 1 will be implemented and limited by understanding of the baseline. Given uncertainties there is inevitably a need to make assumptions. Assumptions are made cautiously and explained within the assessment text. The aim is to strike a balance between comprehensiveness and conciseness/accessibility to the non-specialist. In many instances, given reasonable assumptions, it is not possible to predict 'significant effects', but it is possible to comment on merits (or otherwise) of the site allocations and alternatives in more general terms.

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

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

Site References	Assumption made
All sites	Local Plan Part 1 Policy 68: Managing Vehicle Traffic states that all new residential developments (major and minor) in the borough should be car-free. In some circumstances a developer may justify provision of car parking. Where car parking is required, considerations will apply including not exceeding car parking standards. It has been assumed that car-free developments will be delivered as much as possible within the borough through the development control system.
Sites SA05, SA06, SA07, SA08, SA09, SA46, SA47, SA48, SA52	It is assumed that no development will be permitted until developers can demonstrate that flood risk can be successfully mitigated in the design of the development.
All sites within an air quality focus area	It is assumed that any developments coming forward within air quality focus areas will put forward designs which are air quality positive, in accordance with Local Plan Part 1 Policy 90: Air Pollution.

Site References	Assumption made
Sites SA57 and SA58	City of London, Conservators of Epping Forest have commented at the Regulation 18 stage that these sites could affect the natural aspect of the forest edge in this area. It is assumed that this will be mitigated at the development design stage in accordance with Local Plan part 1 policies 83 (Epping Forest) and 56 (High Quality Design).
Site SA10	It has been assumed (and confirmed by LBWFC) that the leisure centre currently on site would be reprovided on site.
Site SA44	It has been assumed that the current community space will be reprovided on site.
Alternative site WND06	It has also been assumed that current community centre space at the site will be retained or reprovided on site.
Site SA33	The site contains some existing employment use which may not be replaced by the redevelopment.

2.6 How the requirements of the SEA regulations have been met

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

Table 6: Fulfilling the Requirements of the SEA regulations

What the regulations say ¹⁵	How this is addressed
An outline of the contents, main objectives of the plan or programme.	Set out in Section 3 of this document and supported by Appendix A.
An outline of the relationship with other relevant plans and programmes.	Set out in Section 4 of this document.
The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	Set out in Section 5 of this document and supported by Appendix B.
The environmental characteristics of areas likely to be significantly affected.	Section 3.3 of this document outlines the characteristics of the plan area in general and Section 5 outlines those areas likely to be significantly affected. These characteristics and potential interactions have been informed by information contained within the SA baseline data (Section 5).
Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.	Section 5 of this document outlines key sustainability issues related to each SA topic. This includes sites designated pursuant to Directives 79/409/EEC and 92/43/EEC. Further information will also be available in the separate Habitat Regulations Assessment (HRA) Report.
The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation.	Section 4 and Appendix A outline relevant environmental protection objectives. The way that those environmental objectives have been taken into account has been through integrating them into the SA Framework.
The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. The identification of the above effects should consider secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects.	Section 7 sets out the significant effects of the draft Local Plan and Section 6 discusses the significant effects of reasonable alternatives. Details of the nature of effects are provided within Appendix C (and Appendix D for alternative sites). This includes indirect (secondary), cumulative (cumulative and synergistic), duration (short/medium/long term), permanent or temporary and negative or positive effects. Definitions are provided within Table 4 in Section 2.4.
The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	Section 9 sets out mitigation measures for significant negative effects and uncertain effects.
An outline of the reasons for selecting the alternatives dealt with	Section 6 outlines the reasons for selecting the alternatives dealt with.
A description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.	Section 2 outlines the methodology for all stages of the SA and Section 2.5 specifically describes any technical difficulties that were encountered.

¹⁵ Please see Schedule 2 of the SEA regulations: *Information for Environmental Reports*.

Table 6: Fulfilling the Requirements of the SEA regulations

What the regulations say ¹⁵	How this is addressed
	Section 5 outlines data gaps.
A description of measures envisaged concerning monitoring.	Monitoring arrangements are set out in Section 10 and indicators will be detailed within the Adoption Statement.
A non-technical summary of the information provided under the above headings.	See separate non-technical summary.
The report must include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment.	The whole SA Report addresses this.
Consultation: Authorities with environmental responsibility, when deciding on the scope and level of detail of the information which must be included in the environmental report (Art. 5.4).	The Scoping Report was consulted on with key stakeholders ¹⁶ , adjoining boroughs and the public for a five week period from 18 March 2020 to 23 April 2020.
Authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme.	A version of the SA Report was consulted on alongside the Regulation 18 draft Site Allocations Document between 26 th October and 14 th December 2020. This version of the SA Report will be consulted on alongside the Regulation 19 draft Site Allocations Document which is being consulted on between 8 th November and 14 th January 2022.
EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country.	Section 7 presents the potential significant effects of the draft Site Allocations Document. The assessment has not identified any potential effects on other EU member states.
Taking the environmental report and the results of the consultations into account in decision-making (Art. 8). Provision of information on the decision: When the plan or programme is adopted, the public and any countries consulted under Art.7 must be informed and the following made available to those so informed: The plan or programme as adopted. A statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report of Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Art. 7 have been taken into account in accordance with Art. 8, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with. The measures decided concerning monitoring.	This will be set out in the SA Adoption Statement.
Monitoring of the significant environmental effects of the plan's or programme's implementation.	Monitoring arrangements are set out in Section 10 and indicators will be detailed within the Adoption Statement.

¹⁶ Environment Agency, Natural England, Historic England are the SEA statutory consultees.

3 The Content of the Waltham Forest Site Allocations Document

The SEA Regulations require information on:

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

The Waltham Forest Local Plan is formed of the Local Plan (Part 1) and the Site Allocations Document (Part 2). The Local Plan Part 1 sets out strategic policies and development management policies for delivering development across the borough. The Site Allocations Document forms Part 2 of the Local Plan and sets out where strategic development will be delivered across the borough. These two documents should be read together.

Once adopted, the Waltham Forest Local Plan (2020-2035) will shape and manage good growth, development and regeneration across the Borough for the next 15 years. It sets out how the Borough will meet the challenges of economic, environmental and social sustainability to ensure good growth and sustainable development. It aims to promote the sustainable growth of Waltham Forest.

The Site Allocation Local Plan sets out what uses and development the Council would prefer to be deliver on a range of identified sites across the borough. The plan period is the same as the Local Plan Part 1 – 2020-2035. The site allocations will set out the preferred use or mix of uses as well as set out any policy criteria or guidance for the development of the site. These sites are allocated to support the delivery of the Local Plan and the London Plan.

The Site Allocations Document area is shown in Figure 3.1. The Site Allocations Document includes:

- Proposed development site locations, for strategic development across the Borough;
- Sites associated with the delivery of essential infrastructure to support growth;
- Estimated timescales for delivery or development;
- The proposed use of potential sites i.e. for residential, employment or mixed use; and
- Specific mitigation required for the development of specific sites, and particular development constraints associated with sites.

The Council has consulted on the scope of the Site Allocations Document. A Regulation 18 version of the Site Allocations Document (LP2) was consultation on between October and December 2020. Since then, consultation comments have been responded to and a second iteration of the Site Allocations Document (LP2) prepared. This SA Report has been updated and sits alongside the Site Allocations Document (Regulation 19 (second draft)) version of the LP2.

3.1 The Main Objectives of the Site Allocations Document

The Local Plan Part 1 sets out strategic policies and development management policies for delivering development across the borough. The Site Allocations Document forms Part 2 of the Local Plan and sets out where strategic development will be delivered across the borough over the plan period 2020-2035. These two documents should be read together.

3.2 Plan Vision and Objectives

There are no separate vision or objectives for the Site Allocations Document. These are set out within the Local Plan Part 1 and are reproduced here in order to set the context of the Site Allocations Document. The Local Plan Part 1 (Regulation 19) vision and objectives are reproduced in Boxes 3.1 - 3.3:

Box 3.1: Waltham Forest Local Plan Six Golden Threads

The Local Plan sets out the strategic priorities for development of the borough over the next 15 years. There are five golden threads that shape the Local Plan; these will deliver the priorities set out in Council's Creating Futures corporate strategy. These are as follows and are all considered to have equal value.

Six Golden Threads

- Increasing housing delivery, creating liveable places
- Ensuring growth is sustainable and supported by infrastructure
- Building on the unique strengths of the borough and carrying forward its cultural legacy
- Promoting the economy to improve the life chances for all residents, students and workers
- Protect and enhance the natural environment
- Ensuring land optimisation and driving investment

Box 3.2: Waltham Forest Local Plan Vision

Waltham Forest in 2035

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

Liveable Waltham Forest

Waltham Forest's vibrant network of distinctive and thriving town centres will be cultural community hubs, bringing the city to the suburbs and supporting creative, healthy and active lifestyles. Building on the success of Enjoy Waltham Forest, the Borough's extensive network of green spaces including forest, open space, Green flagged parks, neighbourhood and pocket parks and urban space will help to connect these centres to new liveable neighbourhoods by integrated walking and cycling routes and improved public transport. These liveable neighbourhoods will include a choice and mix of genuinely affordable new homes, which along with an increasing number of local jobs will realise the Plan's ambitions to make the Borough the model of new metropolitan cultural suburbs.

Growing a creative, diverse and resilient economy in Waltham Forest

Attracting inward investment into Waltham Forest's dynamic economy is central to delivering transformational good growth and the success of this Plan. Successful growth in Waltham Forest will focus on improving life chances and job opportunities for its residents.

The Borough will maximise the advantages of its access to the most economically vibrant parts of London and its position in the UK Innovation Corridor (London-Stansted-Cambridge) to grow its own creative and cultural economy. Building on its growing and strongest sectors, Waltham Forest will be a leader in the capital's cultural, creative and digital economy, cementing its economic stability and resilience; extending its economic offer and helping residents to achieve their potential.

Waltham Forest as a place of leisure

Waltham Forest will be one of London's top locations for leisure and recreation. The Borough's diverse visitor attractions, (such as the William Morris Gallery, Walthamstow Wetlands and Victoria Halls) its places, cultural offer and green and blue assets which include access to Epping Forest, the Lee Valley Regional Park, reservoirs and marshland are for residents and all to enjoy.

A key ambition of this Plan is to promote the Borough as a vibrant place to live and visit. We aim to deliver a diverse and inclusive 24/7 economy in Waltham Forest's town centres (where appropriate) and culture venues, building a cultural legacy celebrating the creativity of the Borough's communities

Box 3.3: Walthamstow Local Plan Strategic Objectives

There are 13 strategic objectives that will deliver the vision for Waltham Forest by 2035, these are:

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

3.3 Overview of the Plan Area

Waltham Forest is an outer London Borough in the North East of London and is one of the greenest Boroughs in London. It is also one of the most diverse areas in the country with 48 per cent of residents from a minority ethnic background and is relatively small at approximately 3,880 hectares (ha). The Local Plan area is shown in Figure 1.

The North Circular Road (A406) divides the Borough into two main areas and is the extent of the expanded Ultra Low Emissions Zone (ULEZ) since 25 October 2021. The London Borough of Waltham Forest was created in 1965 by bringing together the parishes Chingford, Walthamstow and Leyton. These roughly align with the geographic areas of the borough identified in the Proposed Submission 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 Road).

The Borough is a collection of neighbourhoods built up around busy high streets and stations, areas of industry and a total of 1205ha of open space, parks and playing fields. The Green Belt in the borough is part of the Metropolitan Green Belt which surrounds London.

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

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

Waltham Forest Site Allocations Document (LP2). Sustainability Appraisal – SA Report 35

4 Review of Other Programmes and Plans

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

“An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes.” (Schedule 2, Paragraph 1); and

“The environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.” (Schedule 2, Paragraph 5).

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

For practical reasons, the scoping task of identifying related plans and programmes cannot yield an exhaustive or definitive list of legislative/non-legislative documents. The review has been focused to ensure that only policies that are current and of direct relevance to the Local Plan are reviewed. A detailed outline of the policy documents, the objectives and the targets reviewed is set out in Appendix A. Table 4.1 outlines the key messages of the PPP.

The completed review of policies, plans and programmes provides the context for the SA and helps to inform and SA Framework of objectives and sub-objectives which will guide the subsequent appraisal process (see Chapter 20).

4.1 Summary of Key Messages

Table 7 sets out the key messages drawn from the review of PPP. A more detailed review of these messages is available in Appendix A. The messages presented in Table 4.1 are reflected within the detailed SA Framework which can be found in Chapter 20.

Table 7: Key messages from PPP review

SA Topic	Key Messages from Review
Population	<ul style="list-style-type: none"> To create mixed and well balanced communities, which are well integrated and provide the conditions needed for all to live and work in harmony. To create safe and accessible environments and developments. To provide high quality spaces for the community, and prevent the loss of existing facilities. To create a Borough with the infrastructure and facilities which are capable of meeting current and future population needs, sustaining and improving services. Improve quality of life for all. Promote volunteering and other local activities for elderly people.

SA Topic	Key Messages from Review
	<ul style="list-style-type: none"> • There is a need to ensure there is adequate older persons' accommodation-supply has not previously met demand. • Culture, arts and sport are important to communities within Waltham Forest. • There is a need to promote and protect these activities, increasing participation.
Human Health	<ul style="list-style-type: none"> • Awareness of mental health, facilities to support those experiencing poor mental health and promoting ways of dealing with mental health all need to be promoted within the Borough. • Mental wellbeing needs to be monitored across the Borough. • Support for young people and families experiencing poor mental health needs to be promoted and provided for all. • Children and young adults need to be kept healthy and safe, ensuring they have dignity and choice in their lives. • Access to high quality open spaces and opportunities for sports needs to be maintained in line with population increases in order to support the physical and mental health of the community. • Fast food outlets need to be restricted within 400m of schools, youth facilities and parks, in order to help curb the proportion of children within the Borough who are obese or overweight. • Ensure that all have long, healthy and happy lives. • Tackle issues particularly prevalent in minority ethnic groups, such as diabetes, dementia and obesity. • Reduce inequalities in health across Waltham Forest. • Increase healthy life expectancy and reduce differences in life expectancy.
Economy	<ul style="list-style-type: none"> • Support and grow an economy for residents to live and work within the Borough. • Support small businesses. • Support the sustainable growth and expansion of all types of business and enterprise.
Employment and Skills	<ul style="list-style-type: none"> • Create flexible jobs, which are secure for those most in need. • Create workspaces which meet the needs of businesses within the Borough. • Ensure that all residents have access to training and skills development, to enable them to gain high quality employment. • Address inequalities in employment across the Borough. • Ensure young people have access to information on career and training opportunities. • Support those with lower skills and wages by providing training to increase their skill levels.
Transport	<ul style="list-style-type: none"> • Work towards a zero emission Borough, by decreasing the use of private cars and increasing sustainable transport use. • Promote walking, cycling and public transport and the associated health benefits. • Manage patterns of development to ensure that walk, cycling and public transport are fully utilised. • Increase the efficiency of transport. • Reduce road emissions and noise. • There is a need to ensure that, where development occurs, there is adequate public and sustainable transport options available. • Improve the quality and quantity of public transport. • Increase the availability of secure bicycle parking and make cycling safer.
Crime and Safety	<ul style="list-style-type: none"> • Ensure all feel safe within Waltham Forest, especially those who are residents. • Reduce incidents of anti-social behaviour, hate crime and intolerance and support victims. • Reduce the number of weapons on the streets and work to reduce knife crime. • Increase community engagement. • Provide support and education to local areas to tackle gang and youth violence problems.

SA Topic	Key Messages from Review
	<ul style="list-style-type: none"> • Ensure there is early prevention of crime and pathways out of crime are made available to young people. • Improve support for young offenders.
Housing	<ul style="list-style-type: none"> • Plan for a mix of housing based on current and future demographic needs. • Identify the size and tenure of housing required in locations around the Borough and ensure that future development is tailored to these needs. • There is a need for more homes, of which 50% should be affordable. • Create mixed and inclusive communities, including those with specialist housing. • Ensure housing is of high quality. • Homelessness needs to be tackled, particularly those who are rough sleepers. • The composition of households is undergoing changes, which will need to be reflected in the development of future accommodation. • A higher proportion of homes adapted for elderly people is likely to be required, as the demographics of the population continue to shift towards those over 65.
Townscape and Heritage	<ul style="list-style-type: none"> • Conserve heritage assets in a manner appropriate to their significance. • The connection between people and places they live in needs to be considered in future development, allowing integration of new developments into the existing built and historic environment. • Release land, where possible, for housing development. • Identify, record and protect (where appropriate) the archaeology and heritage assets of development sites. • Restoration of heritage assets is encouraged to given new vitality and use to otherwise vulnerable buildings, although consideration and protection of these assets will need to be carefully managed. • Promote the Borough's history and heritage as part of the culture of Waltham Forest. • All should be able to participate in the conservation and appreciation of heritage assets, and understanding of the significance of key assets should be promoted.
Climate	<ul style="list-style-type: none"> • There is a need to decrease greenhouse gas emissions from all anthropogenic sources. • A shift to 'cleaner' renewable energy sources is to be encouraged across the entire Borough. • Existing homes will need to increase in energy efficiency, and new homes will need to be energy efficient. Public buildings will also need to be retrofitted to increase energy efficiencies. • Adaptation to the effects of climate change will be required, including flooding and drought. • Future land use changes should not impact the ability of the Borough to react to future climate change induced conditions. • Long term resilience of homes, businesses and infrastructure should be increased. • Low carbon heat networks, which use decentralised energy sources are to be increased across London.
Air Quality	<ul style="list-style-type: none"> • Improving air quality is a priority. • Reduce emissions from transport and homes. • Go beyond legal requirements to protect human health and minimise inequalities • The Low Emission Zone has been introduced, with the expansion of the ULEZ in October 2021. • Communities will need to be supported to reduce exposure to poor air quality • Reduce inequalities in air quality. • Reduce the exposure of young children to poor air quality surrounding schools, nurseries and other educational establishments. • Promote sustainable design and construction to reduce emissions from the demolition and construction of buildings. • Monitor air pollution and reduce in line with agreed targets.

SA Topic	Key Messages from Review
Soil and Geology	<ul style="list-style-type: none"> • Protect and enhance valued landscapes and soils, preventing degradation. • Identify and remediate contaminated land. • Prevent soil pollution during construction and development.
Water	<ul style="list-style-type: none"> • Development in areas at risk of flooding should be avoided. • Development in one location should not affect flooding elsewhere. • Flood risks from all sources will need to be managed. • Water quality should be increased where possible. • The demand for water is likely to exceed current water supply if the population continues to increase. • Awareness of flooding risk management measures will need to be increased amongst residents and businesses. • There should be no deterioration in the health and quality of existing water bodies and development should improve the status of waterbodies to achieve 'Good Overall Status in accordance with the Water Framework Directive'. • Water pollution should be minimised and reversed. • Entry of pollutants to water needs to be restricted.
Biodiversity	<ul style="list-style-type: none"> • Impacts of development on biodiversity should be minimised. • Net gains should be provided where possible. • The benefits of wider ecosystem services need to be recognised. • Ecological networks need to be developed to create more robust ecosystems. • Green infrastructure and natural capital need to be recognised and protected. • Terrestrial and freshwater sites should be restored. • Woodland should be increased. • Invasive non-native species should be prevented from entering the Borough, and those already established should be eradicated. • Trees and woodlands should be enhanced and woodland protected. • Wildlife and habitats, particularly those of international, national and regional importance, should be protected and enhanced within Waltham Forest. • Seek opportunities to increase the area and number of priority and locally important habitats. • Help people to connect with nature and use open spaces by ensuring they are accessible to all. • Maintain existing ecological networks and create buffer zones around high quality habitats.
Landscape	<ul style="list-style-type: none"> • There is a need to map existing open spaces within the Borough, depicting current land use. • The quality, quantity and accessibility of open spaces should be assessed. • Areas of need and inequalities in open space should be identified and addressed. • Protect Green Belt and Metropolitan Open Land. • Promote or reinforce local distinctiveness. • Establish a strong sense of place, using streetscapes and buildings to create attractive, functional places to live, work and visit. • Create safe and accessible landscapes to help tackle the fear of crime and increase quality of life; • Ensure the built environment is visually attractive. • Protect Lee Valley Park from development which would not have a positive effect on the Park, including those outside of the Park boundaries.
Waste	<ul style="list-style-type: none"> • Work as part of the North London Waste Plan to manage and process as much waste as possible within the local area. • Eliminate food waste sent to landfill. • Eliminate avoidable waste of all kinds. • Increase the proportion of waste recycled, reused or composted. • Manage waste without endangering health or the environment (including water, air, soil plants and animals).

SA Topic	Key Messages from Review
	<ul style="list-style-type: none"> • Avoid nuisance from waste noise or odours. • Follow the waste hierarchy (Prevent waste, reuse, recycle, other recovery methods, dispose).

5 Summary of Baseline Data

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

5.1 Population

5.1.1 Introduction

The population of Waltham Forest in 2019 was estimated as 286,775¹⁷. Median age was 34.9 compared to the national average of 40. The Borough is one of the most diverse areas in the country, with 48% of residents from a minority ethnic background¹⁸.

5.1.2 Likely Future Conditions

The population of Waltham Forest is expected to continue to increase and at a faster rate than previously predicted. The current trend of growth of all ethnic groups is expected to continue.¹⁹ The revised ONS subnational population estimates put Waltham Forest in the top five local authorities in the country for the largest positive percentage difference between the actual and predicted population estimates²⁰. The population of Waltham Forest in 2011 was 12.5% higher than previously predicted. The overall increase in population between 2016 and 2021 is now projected to be around 16,700, a 6% increase²¹.

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

5.1.3 Sustainability Issues

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

- As the population continues to increase so does the demand for housing, infrastructure, facilities and employment;
- The population density within the Borough exceeds both the London and the national averages;
- There is a need to create high quality places to live, work and recreate that are mixed and well-balanced in terms of tenure and income;

¹⁷ Greater London Authority (GLA) London Data Store, 2018 round population projections, <https://data.london.gov.uk/dataset/projections> Accessed on: 08/01/2020

¹⁸ Waltham Forest, Statistics about the Borough, <https://www.walthamforest.gov.uk/content/statistics-about-borough> Accessed on: 08/01/2020

¹⁹ GLA ethnic demographic projections.

²⁰ ONS Population Estimates for England and Wales, Mid-2002 to Mid-2010 Revised (Subnational), 30 April 2013

²¹ GLA 2015 round population projections

- Adequate support and facilities for older residents, including independent living, has been noted in particular to be needed;
- There is a need to build on the Borough's arts, culture and sport strengths across the Borough's diverse and changing population;
- There is a need to provide inclusive services; promote equal opportunities; oppose discrimination, intolerance and disadvantage through reducing inequalities and promoting community cohesion; and
- There is a need to reduce the number of older people who feel socially isolated, by getting them actively participating in community life.

5.1.4 Data Gaps

Population estimates which are based on 2011 census data, are now almost a decade old. More recent data regarding populations is therefore expected to be available following the 2021 census. Similarly, more accurate Greater London Authority population estimates were due to be updated in 2020, but these were not available at the time of compiling the baseline data.

5.2 Human Health

5.2.1 Introduction

The World Health Organisation define health as 'a state of complete physical, mental and social well-being and not merely the absence of disease or infirmity'²². In 2015 Waltham Forest was in the top 10% of most deprived Boroughs in England. The Indices of Multiple Deprivation (IMD) is a qualitative study which looks at relative deprivation for small areas, using 37 key indicators. In terms of the overall measure of multiple deprivation, Waltham Forest is ranked as the 35th most deprived among the 326 local authorities in England²³. This is an improvement from 2010 where it was ranked 15th but it represents an overall decline from 47th in 2004²⁴. Out of 33 London Boroughs, Waltham Forest is 6th most deprived after neighbouring Boroughs of Hackney, Newham and Haringey as well as Tower Hamlets and Islington²⁵.

Likely Future Conditions

As the population of Waltham Forest ages, the demand for health and social care needs will increase. By 2031, 42% of all people aged over 50 are projected to be from a minority ethnic background, which are at a greater risk of developing cardiovascular disease compared to the general population²⁶. People aged 60 and over living with a life limiting condition is projected to rise by almost 30% by 2030²⁷.

²² World Health Organisation (1948) Preamble to the Constitution of the World Health Organisation

²³ Waltham Forest, Statistics about the Borough: <https://www.walthamforest.gov.uk/content/statistics-about-borough>

²⁴ Age UK Waltham Forest Profile: Deprivation in Waltham Forest: 08/01/2013

²⁵ Age UK Waltham Forest Profile: Deprivation in Waltham Forest: 08/01/2013

²⁶ Waltham Forest Joint Strategic Needs Assessment 2014/2015

²⁷ Age UK Waltham Forest Profile: Deprivation in Waltham Forest, 08/01/2013

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

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

With the ULEZ expanded into the southern part of the borough up to the North Circular road since 25 October 2021, air quality within the south of the borough may improve.

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

5.2.2 Sustainability Issues

The following sustainability issues have been identified:

- Currently a large proportion of the population are aged over 50 and this is projected to rise over the next 20 years (+26% rise by 2021²⁸);
- There are inequalities in health and life expectancy between ethnic groups;
- Disparities between wards, particularly between the north and south of the Borough;
- There is a need to improve life expectancies through promoting healthy lifestyles for all ages;
- Need to ensure adequate access to green spaces and recreational facilities to promote active and healthy lifestyles;
- Promote high quality housing with a range of tenures to reduce health issues which arise from poor quality accommodation;
- Need to increase recognition of the growing evidence of a relationship between physical and mental health;
- Need to increase levels of active travel throughout the borough in order to increase physical activity levels and tackle poor air quality;
- Childhood obesity rates are higher within Waltham Forest than both regionally and nationally;
- TB remains a disease which is of high prevalence within the Borough; and
- Need to ensure that hospitals have fit for purpose facilities (i.e. less converted houses) that meet the needs of patients.

²⁸ GLA, 2015 Population projections

5.2.3 Data Gaps

Some health data, such as the number of hospital emissions, has come from the 2011 Census. This data is therefore now almost a decade old, and further updates will not be available until after the 2021 Census. The production of an updated Healthy Weight Strategy post 2020 and a Joint Strategic Needs Assessment is currently underway, but neither document was available for use in the preparation of this report.

An open space strategy and a cultural infrastructure delivery plan are currently being prepared for Waltham Forest and were not available at the time of writing this report. When they are available, the findings will be incorporated into the SA.

5.3 Economy

5.3.1 Introduction

The number of new business registrations grew by 98% between 2011-2018 compared to the London average of 58.5%²⁹. The top five sectors which have seen the greatest amount of growth are: digital and creative (40%); construction (35%); professional and urban services (30%); manufacturing (35%); and retail (10%).³⁰ Despite this growth, the Borough is ranked 7th in London for unemployment. Compared to the rest of London, Waltham Forest has a comparatively small and lower value economy.

5.3.2 Likely Future Conditions

Forecast levels of job growth in Waltham Forest are for 8,100 additional jobs from 2018 to 2035³¹. The sector mix of the local economy may be beginning to shift from traditional sectors such as industry, manufacturing and retail to creative, digital and technical sectors. If productivity increases to the London level (+11%)³² it will allow the Borough's businesses to better compete with the wider economy.

There may be increasing demands on current industrial areas due to population growth and demand for housing.

Please note that there is a data gap in relation to the impact of the Covid-19 crisis on the economy of the borough and this creates some uncertainty about likely future conditions.

5.3.3 Sustainability Issues

The following sustainability issues have been identified:

- Ensure that ongoing business growth becomes a driver of productivity and fairer wages (e.g. encouraging the London Living Wage), in order to create an increase in the overall prosperity of the Waltham Forest Borough;

²⁹ ONS – Business Demographics and Survival Rates, by Borough, 2018

³⁰ Waltham Forest Economic Growth Strategy, 2016-2020

³¹ Employment Land Study, 2019

³² Waltham Forest Economic Growth Strategy, 2016-2020

- Continue to support the Upper Lee Valley Development Opportunity Area and celebrate its industrial heritage;
- Support is required for the creation of the Creative Enterprise Zone around Blackhorse Lane;
- Support development of successful neighbourhoods;
- Need to ensure that growth supports the delivery of vital infrastructure and new facilities across the Borough;
- Further action is needed in order to support and promote retail, business, cultural, leisure and residential investment in town centres;
- There are likely to be ongoing pressures on industrial sites, need to maintain industrial uses and promote strong local base of small businesses;
- Need to provide additional workspaces and promote denser, mixed use development with no net loss of business floor space.

5.3.4 Data Gaps

Data is not yet available on the impact of the Covid-19 crisis on the economy of the borough. Once available, this will also be incorporated into the SA.

5.4 Employment and Skills

5.4.1 Introduction

The number of jobs in Waltham Forest grew by 30% (the highest growth rate in London) between 2009 to 2014 compared to just 14% across London. In 2018, there were estimated to be 72,000 jobs in Waltham Forest.³³

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%)³⁴. Self-employment (14.6%) is also higher than the national and London average at 10.8% and 13.1% respectively. Waltham Forest is very much a small business economy with 76% of all companies employing four people or less and 94% employing 20 or less. Despite this, 220 larger businesses account for 55% of the all jobs in the Borough³⁵.

5.4.2 Likely Future Conditions

Forecast levels of job growth in the borough are for an additional 8,100 jobs across all sectors over the plan period. Ongoing support of the 'Steps into Work' campaign by the Council, which focuses on engaging those who are economically inactive / or are long term unemployed should help to continue this downward trend of unemployment. However, the situation regarding

³³ Nomis <https://www.nomisweb.co.uk/reports/lmp/la/1946157278/report.aspx#tabjobs>

³⁴ Nomis, Labour Market Profile - Waltham Forest, 2019

³⁵ Waltham Forest Economic Growth Strategy, 2016-2020

funding for this EU project surrounding Brexit is currently unclear. Without more support, the disparities in employment between wards may continue to widen.

Despite growing levels of qualification, Waltham Forest remains one of the worst paid areas of London; however, this gap has been narrowing. With new business interest in the area, particularly in the technology, digital and creative sectors, there may be a new demand for higher educated employees, which could drive up average salaries.

Please note that there is a data gap in relation to the impact of the Covid-19 crisis on employment and this creates some uncertainty about likely future conditions.

5.4.3 Sustainability Issues

The following sustainability issues have been identified:

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

5.4.4 Data Gaps

An Economic Recovery Strategy for Waltham Forest is being prepared but was not available for use in the preparation of this report. The findings will be incorporated into the next iteration of the SA.

Data is not yet available on the impact of the Covid-19 crisis on employment. Once available, this will also be incorporated into the SA.

5.5 Transport

5.5.1 Introduction

Waltham Forest has good public transport linking to the centre of London as well as direct links to Stansted Airport, although these transport links are clustered to the south of the Borough. The Borough has four underground stations (Leyton, Leytonstone Walthamstow Central and Blackhorse Lane) which are served by the Victoria and the Central lines. The Borough is also served by the two over ground services; the Gospel Oak to Barking (GOBLIN) Line and the Chingford to Liverpool Street Line, which forms a main commuter route to Central London. The Borough is also well served by buses, with 37 different routes.

Pre-Covid 19 pandemic the majority of people in the borough commuted using either a car or motorcycle, with the second most popular mode being walking. In total over a quarter (26%) used public transport on their daily commute; this is higher than the Outer London average of 22%, but less than the Greater London average of 29%. Car ownership is ranked 17th out of the London boroughs with an average of 0.8 cars per household³⁶. Levels of car ownership vary across the borough with a clear north-south split; there are more households with cars in the north of the borough compared to the south.

Car ownership in the borough has fluctuated since 2010. The number of vehicles registered within Waltham Forest saw an annual rise between 2010 and 2016, when 546,552 vehicles were registered within the borough³⁷. However, there has since been a decline in vehicle registrations, in 2018/19 and therefore the trend could be improving. This could in part be due to the implementation of the 'Mini Holland' project within the borough and increase in car free development.

Accessibility to public transport levels (PTAL) measures the density of public transport. It is a detailed and accurate measure of the accessibility of a location to the public transport network, which takes into account walk access time and service availability. Areas are graded between 0 and 6b, where a score of 0 is very poor access to public transport, and 6b is excellent access to public transport. Overall the borough is ranked 16th in London for accessibility to transport with a score of 3.6, this is slightly lower than the Greater London average of 3.8, but higher than the Outer London score of 3. The PTAL scores across the borough vary, with a distinct north-south divide. The wards of Leytonstone and Hoe Street have the best scores of 5.5 and 5.2 respectively. The wards with the least access to public transport are Valley and Endlebury, with a score of 2.4.

In 2013 Waltham Forest became successful in securing £30 million in funding from Transport for London and the Mayor of London for their pilot 'Mini Holland' project. The project aims to radically improve the borough's cycling infrastructure and increase the number of people choosing to walk, cycle or use public transport, by adding new safer crossing points, more pedestrianised areas and segregated cycle lines. Over 22km of cycle tracks have been

³⁶ GLA, London Borough Profiles, 2015

³⁷ GLA, London Borough Profiles, 2015

constructed, along with 400 secure cycle parking spaces³⁸. Since the pilot scheme has been introduced, traffic levels in key roads such as Francis Road have fallen by 60%³⁹.

5.5.2 Likely Future Conditions

Despite a high number of people in the Borough using public transport and good transport links, there is still a high dependency on the private car. Some areas, particularly around Walthamstow have seen improvements, and car ownership is beginning to stabilise. Currently 41% of journeys originating in Waltham Forest are made by car; with more improvements to cycling and pedestrian infrastructure this may start to fall. In general, the south of the Borough has better access to public transport compared to the north; this disparity may increase further car ownership and private car journeys in the north.

However, the ULEZ has now been extended into the southern part of the borough (up to the North Circular road) and electric vehicle use is increasing. There is a need to ensure that appropriate infrastructure, such as charging points, is provided. Increasing electric vehicle use will help to reduce air pollution from transport within the Borough.

5.5.3 Sustainability Issues

The following sustainability issues have been identified:

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

³⁸ Enjoy Waltham Forest Walking and Cycling Account 2017/18, November 2018

³⁹ Enjoy Waltham Forest Walking and Cycling Account 2017/18, Nov 2018

- Help to enhance London's transport connectivity;
- Improvements to road safety are needed to reduce casualties; and
- Need to make cycle parking safer and easier to use.

5.5.4 Data Gaps

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

5.6 Crime and Safety

5.6.1 Introduction

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

Between January 2019 and January 2020, 26,239 crimes were reported across the borough of Waltham Forest⁴⁰. The top three crimes recorded in the Borough over this 12 month period were:

- Violence Against the Person (25%): This includes a range of offences, such as harassment, assault without injury, death by dangerous driving and murder;
- Theft (21%): Crimes including theft from a person or vehicle, shoplifting and making off without payment; and
- Vehicle crime (18%): Any crime in which vehicles are stolen or interfered with.

5.6.2 Likely Future Conditions

Overall the number of reported crimes in Waltham Forest increased by 4.5% between 2017 and 2019. This juxtaposed the London trend of a decrease in reported crimes by 4.2%. There has been a considerable rise homicide and drugs related crimes; without intervention this could worsen.

5.6.3 Sustainability Issues

The following sustainability issues were identified:

- There has been an increase in homicide and drugs related crimes;
- The percentage of residents in the Borough that are worried about crime remains higher than the London average;

⁴⁰ Metropolitan Police Safer Neighbourhood Dashboard. <https://www.met.police.uk/sd/stats-and-data/met/crime-data-dashboard/> Accessed 21/02/2020.

- Need to provide safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life;
- Need to develop an approach to tackling crime, improving liveability and reducing anti-social behaviour; and
- There is no clear trend for crime across the Borough, however rates are highest in High Street ward.

5.6.4 Data Gaps

None identified.

5.7 Housing

5.7.1 Introduction

Waltham Forest is one of the fastest growing London Boroughs which is causing an increase in house prices⁴¹. Average house prices in Waltham Forest increased by 27% (for all property types) between June 2015 and June 2020 and are significantly higher than the average for England (an average price of £450,187 in Waltham Forest compared to £254,688 for England)⁴². However, average house prices in Waltham Forest remain lower than the average house prices across London but demonstrate convergence. The ratio of workplace-based earnings to house prices can be used to indicate affordability of house prices. Waltham Forest has a higher ratio than the average for London indicating that it is less affordable for the current residents⁴³. These changes have led to an increase in the proportion of rented properties instead of owner-occupied properties and an increase in homelessness in the area. These trends are mirrored in London⁴¹.

There is a significant difference between the northern and southern urban areas of the borough. The southern and central parts of the Borough are Victorian and Edwardian terraced houses. The northern section of the Borough generally has more open space and community facilities and the houses are built to higher specifications⁴⁴.

Waltham Forest, in general, follows the London and national trends for housing size. There is a large number of small households which gradually decreases with household size. The borough has a slightly higher than average proportion of houses with more than two occupants which is likely to be caused by the high house prices which encourages private renting and house shares.

5.7.2 Likely Future Conditions

Over 50% of households in Waltham Forest are classed as small households, comprising one or two people and 13% of households are lone parents. There are also a high number of households likely to be constituted of students sharing houses. The average cost of dwellings

⁴¹ 'Building for the Future Delivering Housing for Everyone in Waltham Forest' LBWF 2015

⁴² Land Registry <https://landregistry.data.gov.uk/>

⁴³ 'Median and Lower Quartile Ratio of House Prices to Workplace-Based Earnings' DCLG <https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoresidencebasedearningslowerquartileandmedian>

⁴⁴ Waltham Forest Housing Strategy 2008-2028

in Waltham Forest has increased rapidly in the past few years and is still increasing faster than the average London prices. It is becoming increasingly difficult for those on lower incomes to purchase a property and it is unlikely that the current situation will change in the foreseeable future. To combat this, LBWF aims to build more affordable housing.

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

5.7.3 Sustainability Issues

The following sustainability problems have been identified:

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

5.7.4 Data Gaps

Detailed housing tenure and the distribution of the population in different household types data is from the 2011 Census. This is due to be updated when data from the 2021 census is made available.

5.8 Townscape & Heritage

5.8.1 Introduction

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

UNESCO defines cultural heritage as the 'legacy of physical artefacts and intangible attributes of a group or society that are inherited from past generations, maintained in the present and

bestowed for the benefit of future generations'⁴⁵. Historic England defines a heritage asset as "A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Preserving cultural and built heritage can benefit communities by providing an essential educational resource, giving residents a sense of identity as well as contributing to the national and local economy.

Heritage assets include designated heritage assets and assets identified by the local planning authority (including local listing)⁴⁶. Heritage assets include archaeology and non-designated assets. Waltham Forest has 136 statutory Listed Buildings of which 15 are listed on the Historic England Heritage at Risk Register. Of the entries on the Heritage at Risk Register, six are stated to be in very bad condition whilst eight are stated to be in poor condition and one is in fair condition. The majority of these are showing slow signs of decay. However, St Peter in the Forest Church, St Mary's Churchyard, St Andrew's Church and St Margaret & Antioch Church, are stated to be at risk of immediate deterioration. Of the 14 listed, 12 have no solutions agreed or in place. House 698a on High Road and the Church of St Peter and St Paul have agreed solutions which are yet to be implemented.

In addition to the statutory listed buildings, LBWF has produced a list of local buildings which it considers to be of historical or cultural importance. The Council will seek to retain buildings included on its local list of buildings of architectural/historic interest and encourage their sympathetic maintenance and enhancement. There are also 14 Conservation Areas within the borough. The main purpose of Conservation Areas is to preserve or enhance areas of special historic or architectural interest and their settings and place added control on new developments.

Archaeological Priority Areas (APAs) are areas where there is significant known archaeological interest or potential for new discoveries. APAs are used to help protect archaeological remains that might be affected by development.

5.8.2 Likely Future Conditions

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

5.8.3 Sustainability Issues

The following sustainability issues have been identified:

- A number of listed buildings are identified as being in poor condition and are have been included on Historic England's Heritage at Risk Register. Opportunities exist to improve the condition of some listed buildings through development;
- The borough contains 20 Archaeological Priority Areas where there is significant known archaeological interest or potential for new discoveries;

⁴⁵ UNESCO, Tangible Cultural Heritage <http://www.unesco.org/new/en/cairo/culture/tangible-cultural-heritage/>
Accessed on: 19/05/2017

⁴⁶ Historic England website: <https://historicengland.org.uk/advice/hpg/hpr-definitions/h/536274/>

- Ensure that the Conservation Areas, Heritage Assets (including archaeology) and features are preserved or enhanced;
- New developments should respect the urban and historic context, improve townscape and leave a positive architectural legacy;
- Impacts of future development on the local historic environment need to be considered;
- Heritage assets should be managed to sustain their significance;
- Ensure that everyone is able to participate in understanding and sustaining their local historic environment; and
- Development could encroach on Conservation Areas and subsequently negatively affect townscape and heritage assets.

5.8.4 Data Gaps

Conservation Area Appraisals and Management Plans do not exist for all Conservation Areas within the Borough. Historic England has recommended that the LBWFC liaise with GLAAS over updating and improving the Local Plan heritage evidence base and that the local Historic Environment Record is consulted which is particularly relevant when site allocation options are considered.

A Cultural Infrastructure Plan is currently being prepared for Waltham Forest. When it is available, the findings will be incorporated into the SA.

5.9 Climate

5.9.1 Introduction

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

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

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

Emissions of carbon expressed as ‘per capita’ (per resident) allow a comparison across different areas. Per capita CO₂ emissions for Waltham Forest are significantly below those for the UK as a whole and are less than those for the Greater London area. a decrease in emissions from domestic and commercial/industrial sectors, but the transport sector has shown little change.

The main driver of decreasing emissions is the shift in electricity generation to more renewable sources from fossil fuels⁴⁷.

The Mayor of London is aiming to ensure that 25% of London's energy supply is from decentralised energy and the GLA Heat Map has been developed to identify areas of opportunity for decentralised energy⁴⁸. Figure 13.2 shows the south section of Waltham Forest with potential areas for decentralised energy highlighted in grey. The term decentralised energy refers to the generation of energy away from the main grid, close to the point of demand⁴⁹. Two areas are currently being constructed at Blackhorse Lane and Wood Street.

5.9.2 Likely Future Conditions

In the report 'A Summary of Climate Change Risks for London'⁵⁰, the likely effects of climate change on London are discussed. The following climatic changes have been predicted in the 2080s based on the medium scenarios:

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

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

⁴⁷ UK local authority and regional carbon dioxide emissions national statistics: 2005-2017

⁴⁸ GLA Heat Map, <https://maps.london.gov.uk/webmaps/heatmap/> Accessed on 13/01/2020

⁴⁹ The London Plan- Policy 5.5 Decentralised Energy Networks. <https://www.london.gov.uk/what-we-do/planning/london-plan/current-london-plan/london-plan-chapter-five-londons-response/poli-0> Accessed 24/02/2020

⁵⁰ 'A Summary of Climate Change Risks for London' Climate UK, 2012

5.9.3 Sustainability Issues

The following sustainability problems have been identified:

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

5.9.4 Data Gaps

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

5.10 Air Quality

5.10.1 Introduction

The entire Borough has been declared an Air Quality Management Area (AQMA) as a result of high levels of NO₂ and PM₁₀. The ongoing monitoring confirms that exceedances of the NO₂ annual and hourly objectives are exceeded on main roads. Road traffic emissions are currently the dominant source of NO₂, hence this is where poor air quality standards are clustered. For PM₁₀ emissions, monitoring has demonstrated that Waltham Forest is within the legal limits, however, even low levels of emissions can be harmful and the Council are working to reduce consumption⁵¹.

⁵¹ London Borough of Waltham Forest Air Quality Action Plan, 2018-2023.



The majority of Waltham Forest falls within the Transport for London Low Emission Zone (LEZ), which came into force on 4th February 2008. The LEZ applies to vehicles with potentially high emissions of pollutants of concern such as NO₂ and PM₁₀, largely heavy vehicles with diesel engines. The vehicles affected at the outset were lorries, buses and coaches but it was extended in October 2010 to include heavier vans and minibuses. The scheme does not currently apply to cars, motorcycles and small vans (under 1.205 tonnes unladen weight)⁵².

Similarly, the Transport for London ULEZ introduced on 8 April 2019 restricts vehicles which do not meet emissions standards for NO₂ and PM₁₀, through a daily charge, with penalty charges for those who do not comply⁵³. On 25 October 2021, the ULEZ was extended into the southern part of the borough. It could affect journey planning for those travelling to and from Waltham Forest, who may cross into this zone.

The Council has adopted a number of measures to improve air quality including encouraging cycling and walking instead of using private cars, and by promoting a culture of cycling, such as that in the Netherlands. They have also adopted anti-idling legislation and are raising awareness of the impacts of leaving engines idling. The Council has been running community and business engagement projects to reduce pollutant contribution and exposure.

5.10.2 Likely Future Conditions

It is likely that air pollution will continue to be an issue within the Borough given its proximity to the strategic road network. The NO₂ emissions have remained consistent, despite the introduction of schemes to discourage the use of private vehicles. Despite this, since monitoring began in the late 90's, the PM₁₀ concentration levels have also remained relatively consistent.

With the introduction of the ULEZ, which excludes polluting vehicles from entering London, air quality is expected to improve, although early indications are showing no significant change in levels of the pollutants of concern. A potential explanation for this is that the changes in vehicle technology are actually increasing emissions of NO₂ and it is increases in this source of primary NO₂ that is causing the exceedances at background monitoring locations. The introduction of the ULEZ into the borough in 2021 could help to improve air quality further. Other future conditions that may affect air quality are the increase in dispersed pollution sources such as commercial and residential boilers, diesel generators, Combined Heat and Power systems, energy networks, and use of biodiesel and biomass at commercial and residential sites⁵⁴.

5.10.3 Sustainability Issues

The following sustainability problems have been identified:

- Need to help reduce pollution from road vehicles, buildings, industry and construction;
- Reliance on the petrol or diesel-fuelled private car as the main mode of transport;
- Air pollution from the strategic road network is an issue across the Borough and NO₂ emissions have remained constant, not decreasing as predicted;

⁵² Transport for London <https://tfl.gov.uk/> Accessed 13/01/2020

⁵³ Transport for London Ultra Low Emission Zone <https://tfl.gov.uk/modes/driving/ultra-low-emission-zone> Accessed 11/03/2020

⁵⁴ Waltham Forest Air Quality Website - <https://www.walthamforest.gov.uk/content/air-quality>

- Increasing use of biofuels (biodiesel and biomass) will cause further air quality issues; and
- Need to improve efficacy of measures within the AQMA.

5.10.4 Data Gaps

None identified.

5.11 Soil and Geology

5.11.1 Introduction

Government policy promotes development on previously developed land rather than on greenfield land to make the most efficient use of a finite resource. Development within Waltham Forest is constrained by the designation of Green Belt and Metropolitan Open Land; all recent residential completions have taken place on previously developed land. Between 2004 and 2019, the proportion of new residential development on Previously Developed Land within Waltham Forest was 100%⁵⁵.

5.11.2 Likely Future Conditions

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

5.11.3 Sustainability Issues

The following sustainability problems have been identified:

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

5.11.4 Data Gaps

No data on existing contaminated land was identified.

5.12 Water

5.12.1 Introduction

Water resources and the provision of water infrastructure are also becoming of increasing concern in many areas, in response to increases in population. 5.2 million people in England

⁵⁵ London Borough of Waltham Forest: Authority Monitoring Report- Housing 2017/18

and Wales are deemed to be at risk of flooding⁵⁶. As the population rises the number of those at risk of flooding may also rise. Waterways offer a beneficial asset within an urban environment offering recreational activities, areas of open space as well as providing attractive places to live. In spite of this waterways in England are becoming increasingly polluted. Waltham Forest is no exception to this, with many of its lakes and reservoirs being severely polluted.

The River Ching and the River Lee are the two principal rivers that flow through Waltham Forest. The borough also contains the Chingford and Walthamstow Reservoirs which together make up one of the largest expanses of open water in London.

The main source of flood risk in Waltham Forest is fluvial flooding associated with the Lower Lee and its associated diversion channels and tributaries. According to the London assembly in 2014, 2,510 properties were considered to be at high risk (1 in 30 per year) of flooding⁵⁷. This was the highest of all the London Boroughs.

The River Lee last experienced severe flooding in 1947 and since then it has been heavily altered and defended, with a flood relief channel being completed in 1976, in order to prevent a repeat of the 1947 flooding. The wide concrete channel re-joins the River Lee at the Hackney Marshes. Historic cases of flooding, identified in a Level 1 SFRA in 2018, can be seen in Figure 16.1. This shows that there is no clear pattern of flooding, hence flooding is a ubiquitous issue across the Borough⁵⁸. Much of the western side of the Borough lies in Flood Zone 2, with some areas being classified as Flood Zone 3. Many of the areas alongside the River Ching are in Flood Zone 2 (see Figure 16.2). Although the River Lee is no longer tidal, the lower reaches have a tidal influence from the River Thames because the River Lee is 'tide locked' at high tide by Three Mills Lock. This can lead to an increase in water levels in the River Lee and Dagenham Brook⁵⁹.

Although flooding has not occurred recently, the Dagenham Brook also poses a risk to both residential and commercial properties in the densely populated area of Coppermill Lane and the Argall Avenue Industrial Estate. The last recorded flood was in 1977, with two near miss events in 1993 and 2000⁶⁰. The near misses were a direct result of the adjacent River Lee Flood Relief Channel running at full capacity. This still remains the principal threat to flooding in the Dagenham Brook. A scheme to reduce the risk of future flooding is being developed with the Environment Agency and stakeholders.

5.12.2 Likely Future Conditions

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

⁵⁶ National Flood Forum, 2017

⁵⁷ London Assembly, '20 London Boroughs have homes at 'high risk' of flooding' <https://www.london.gov.uk/press-releases/assembly/flood-risk-homes> Accessed on 16/05/2017

⁵⁸ London Borough of Waltham Forest Council, Level 1 Strategic Flood Risk Assessment, 2018

⁵⁹ Waltham Forest Local Flood Risk Management Strategy, 2014

⁶⁰ Environment Agency, Dagenham Brook Flood Alleviation Scheme, 2015

there will be an increase in areas subjected to flooding. Rising sea levels may also give rise to more extreme tidal flooding events, from the River Thames.

5.12.3 Sustainability Issues

The following sustainability issues were identified:

- Diffuse urban water pollution exists in local rivers and water bodies.
- Increasing population will put strain on water resources.
- Potential impacts of the Local Plan policies and site allocations on groundwater need to be identified and addressed.
- There should be no deterioration in the health and quality of existing water bodies and development should improve the status of waterbodies to achieve 'Good Overall Status in accordance with the Water Framework Directive', such as through installing rain planters and reed beds.
- High number of properties at risk of flooding and there is a need to promote flood resistance and resilience measures for these properties. In response to this risk proposals have been developed for Critical Drainage Areas.
- There is a need to promote construction of new flood resistance and resilience measures for existing and future properties to ensure they are resilient to the future effect of climate change and protected against future flood risk.
- Natural flood management techniques should be promoted.
- Ensure that existing flood defences are maintained responsibly by the riparian owner and for remedial works to be carried out where necessary.
- New development will need to allow for an 8 meter buffer zone on both sides of a main river to allow access to the flood defences for maintenance or essential remedial work as well as promoting green and blue infrastructure links, water quality and human health.
- New development will need to incorporate SUDS to sustainably reduce flood risk and there is a need to encourage the retrofitting of existing developments with SUD systems.
- Need to promote the use of new technologies and innovation in flood mitigation measures.
- No action has yet been taken to address the significant flood risk posed by Dagenham Brook to both residential and commercial properties.
- Climate change could interact with increased development to create more flooding events of a higher severity throughout the borough. Waltham Forest needs to be prepared and ready to respond to such events.

5.12.4 Data Gaps

There is a lack of recent data available concerning the health of water bodies within the Borough. This was last updated in 2016. The level 2 SFRA is also awaiting completion and should provide more detail on flooding within the Borough.

5.13 Biodiversity

5.13.1 Introduction

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

Whilst the majority of Waltham Forest is built up, the Borough benefits from open parkland, woodlands and reservoirs with 31%⁶¹ of the land consisting of open greenspace. Preserving open green spaces in urban environments is crucial for providing habitats for nature as well as enhancing peoples' wellbeing.

The Borough is bordered by Epping Forest in the north and east, and the Lee Valley runs which runs down the western side. Waltham Forest has two sites of international importance for nature conservation:

- Lee Valley SPA and Ramsar: This is a wetland of international importance.
- Epping Forest SAC: Epping Forest has been designated for its broad leaved deciduous woodland habitat.

There are also four SSSIs which have all been designated for biological interests within the borough⁶².

5.13.2 Likely Future Conditions

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

5.13.3 Sustainability Issues

The following sustainability issues have been identified:

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

⁶¹ Biodiversity in Waltham Forest, Report of Neighbourhoods Scrutiny Committee, December 2015

⁶² Natural England Designated Sites View, <https://designatedsites.naturalengland.org.uk/SiteSearch.aspx>

- Encourage people to engage with the ownership, design, management, maintenance and use of their environment as part of their own vision for their neighbourhood.
- Protect and enhance the wildlife and habitats in Waltham Forest, in particular those of international, national and regional importance.
- Need to recognise the wider benefits of ecosystem services; minimise impacts on biodiversity.
- Increase awareness that green infrastructure and resilient ecological networks play an important role in aiding climate change adaptation and resilience.
- Seek to enhance green infrastructure networks within the Borough.
- Ensure current ecological networks are not compromised, and future improvements in habitat connectivity are not prejudiced.
- In line with NPPF paragraph 174, new development should achieve biodiversity net-gain in a hierarchical approach with on-site net-gain being preferred and off-site compensation as a last resort.
- Work to conserve and enhance the local environment.

5.13.4 Data Gaps

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

There are several strategies relevant to the Borough which have not been updated within the last 5 years including the Natural Environment White Paper; England Trees, Woods and Forest Strategy and the England Biodiversity Strategy Climate Change Adaptation principles.

A green and blue infrastructure study is currently being prepared for the Borough and should be finalised in September. An open space strategy is also currently being prepared. When they are available, the findings from these studies will be incorporated into the SA.

5.14 Landscape

5.14.1 Introduction

Landscape character is defined as 'a distinct, recognisable and consistent pattern of elements in the landscape that makes one landscape different from another, rather than better or worse'⁶³. Landscape gives a locality its sense of place, making it different from neighbouring localities.

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

Waltham Forest covers an area of 3,882 ha with 1,205 ha or 31% of this area consisting of open space. Lee Valley Regional Park and Epping Forest partially lie within the borough which

⁶³ Landscape Character Assessment (2008) <http://www.landscapecharacter.org.uk/> Landscape Character Network

significantly contribute to the open space areas. A large proportion of the open space within Waltham Forest is either Metropolitan Green Belt (842ha) or Metropolitan Open Land (211 ha)⁶⁴. The western side of the borough encompasses a large part of the Lee Valley Regional Park, whilst the eastern borough boundary is dominated by Epping Forest. The borough slopes gradually from the forested hills in the east to the low-lying lands of the valley bottom, and ranges between 50m to 0m above sea level⁶⁵. The borough has seven premier parks⁶⁶ (Lloyd and Aveling Park, Leyton Jubilee Park, Ridgeway Park, Langthorne Park, Memorial Park, Abbots Park, and Coronation Gardens).

There are key vantage points in the borough where views of the City of London and Canary Wharf are glimpsed at a number of locations including Pole Hill and Leyton Station bridge. In addition, views across the Lee Valley to Alexandra Palace and Muswell Hill occur frequently through the central and western parts of the borough. Friday Hill provides longer views through the majority of the residential neighbourhoods.

5.14.2 Likely Future Conditions

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

5.14.3 Sustainability Issues

The following sustainability problems have been identified:

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

5.14.4 Data Gaps

A land use map has been used in this baseline which dates back to 2011, as a more recent map was not available. Since 2011, it is likely that some areas have undergone land use changes, hence there could now be some inaccuracies in this data.

The version of the open space strategy used in the PPP review was a draft version. A final version could have slightly different details, although it is expected that the key messages will not change.

A tall buildings strategy is currently being prepared for Waltham Forest. When it is available, the findings will be incorporated into the SA.

⁶⁴ London Borough of Waltham Forest Open Space Strategy, 2010

⁶⁵ London Borough of Waltham Forest Characterisation Study, 2009

⁶⁶ <https://walthamforest.gov.uk/content/general-information-parks-and-open-spaces> Accessed 24/02/2020.

5.15 Waste

5.15.1 Introduction

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

At present, over half of the rubbish generated in North London is sent for disposal outside of London million with over 70% of this going to landfill⁶⁷. There is a real need to reduce waste generation and for it to be managed in a more sustainable way, with an emphasis on reuse, recycling and recovery. Waltham Forest has worked jointly with six other North London Boroughs to produce a North London Joint Waste Strategy. A new energy-from-waste plant to serve North London is being developed in the London Borough of Enfield, just beyond the Waltham Forest boundary.

Waste production per household in Waltham Forest is higher than the national and London averages. There is a downward trend in volume of waste generated but Waltham Forest is now the 4th worst performing borough when it comes to recycling and waste. Waste collected per household is above the national average by over 100kg. However, Waltham Forest has seen an overall decrease in kg of waste generated between 2017/18 and 2018/19, reflecting the London and National trends⁶⁸. Waltham Forest recycled around 27% of household waste in 2017. This falls short of both the national average of 43.70% and the London average of 33.0%⁶⁹.

5.15.2 Likely Future Conditions

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

5.15.3 Sustainability Issues

The following sustainability issues have been identified:

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

⁶⁷ North London Waste Plan (Draft), 2015

⁶⁸ Local government association, Residual household waste per household in Waltham Forest (generated report)

⁶⁹ WRAP.org London key waste and recycling data <http://laportal.wrap.org.uk/LWARBKeyData.aspx> Accessed 14/01/2020



- Need to ensure that future development will not compromise the ability of the borough to deal with waste.

5.15.4 Data Gaps

An Annual Monitoring Report was not available after 2015 for the borough. Therefore, the current condition of waste production, collection and recycling could not be ascertained for 2019/20.

6 Alternatives

6.1 Introduction

This section describes how alternatives have been considered and assessed. The site selection process has been informed by the consideration of spatial strategies for the borough (i.e. 'top down') and the identification of available developments sites (i.e. 'bottom up'). The process followed for identifying proposed site allocations is described below. 98 alternatives sites have been assessed in total. 16 sites have been rejected. The reasons for selection and rejection can be found in Subsection 6.3 below.

Spatial strategy options have been considered in the SA of the Local Plan Part 1 and these are also discussed in this section.

6.2 Spatial strategy options

Spatial strategy options were assessed twice in the SA of the Local Plan Part 1. Firstly, strategic options were considered in the Direction of Travel document consulted on in November – December 2017. A preferred spatial strategy was then identified as performing most positively compared with other options. The preferred spatial strategy was subject to SA alongside the existing spatial strategy in the adopted Waltham Forest Core Strategy⁷⁰. The findings of the assessments of the spatial strategy options are presented with the SA Report of the Local Plan Part 1 which is available here: <https://www.walthamforest.gov.uk/content/local-plan>

The SA of strategic spatial strategy options for the Local Plan Part 1 fed into the development of a preferred spatial approach. This approach includes strategic locations as areas in which development should be focused. These areas do not have defined boundaries but are a general guidance of locations within Waltham Forest borough where the Council wish to locate future development. Site allocations have been identified within, but are not entirely limited to, the strategic locations.

6.3 Allocation Site Identification and Selection

The sites which have been considered for allocation have been sourced and developed from several evidential sources. These include:

- GLA SHLAA (2017);
- Waltham Forest Growth Capacity Study (2018);
- Waltham Forest Character and Intensification Study (2019);
- Waltham Forest Skyline Study (Draft, 2020); and
- Several 'Call for Sites' (2017-2020).

⁷⁰ Waltham Forest Local Plan Core Strategy Adopted March 2012 <https://www.walthamforest.gov.uk/content/core-strategy>

The starting point for the site selection process was to make sure that the range of options is as wide as possible so that all reasonable site options could be identified and assessed.

The GLA SHLAA methodology relied on identifying large sites (0.25 ha or greater), and modelling supply from small sites (<0.25ha). This represented 38% of overall housing capacity in London, and almost 50% in Waltham Forest. The sites identified in the SHLAA, along with public land ownerships and records of current and lapsed planning permission were analysed through the Growth Capacity Study (GCS), which undertook a suite of site identification work (desk-based and on-site surveys) to better understand how realistic delivering the small site target was, and the overall quantum of development which could be achieved through various intensification strategies.

The study considered 1,166 sites, which were reviewed through a stocktaking process, including review with Council officers, to eliminate sites which had been identified that were inappropriate for residential development. This reduced the number of sites being reviewed in the capacity estimation stage of the GCS process to 443. The GCS undertook a site discounting process based on assessment of availability and achievability, and 269 sites remained after this step.

The GCS provided a rough estimation of the quantum of development however, it was acknowledged that design work should be used to estimate development potential to better reflect the real development potential of sites, in acknowledgement of the densities that have been achieved recently within the borough and desire to optimise the use of land. This design work carried out through the Character and Intensification Study, the Skyline Study, and in some cases feasibility studies and masterplanning work, further refined the detail and identification of the sites considered to be reasonable alternatives for allocations at the Regulation 18 stage.

Sites selected for inclusion have been identified to be 'Strategic', meaning that they are estimated to deliver 100 or more residential units, or 'Critical', meaning that they are for <100 residential units, but are considered critical to delivering the strategic priorities of the Local Plan.

6.4 Alternative Sites

93 alternative sites were assessed at the Regulation 18 stage. 71 sites were selected as preferred sites and 22 sites were rejected at that stage.

At the Regulation 19 stage, one of the previously selected sites (Chingford Station Car Park and Bus Terminal) has been rejected as a reasonable alternative because it was not considered suitable or developable due to the site size being too small.

Six of the 22 rejected sites at the Regulation 18 stage have been reconsidered and selected as preferred site allocations in the Regulation 19 plan (sites prefixed with WND in Table 8). These are currently industrial sites. In addition, five new alternative sites have come forward and been assessed and selected as site allocations at the Regulation 19 stage. These sites are also listed in Table 8.

The sites listed in Table 8 have been selected in order to promote the development of the sites which are identified in the Employment Land Audit as being the most suitable sites to achieve



industrial intensification. The additional need is primarily for space in the B8 use class to support growth in the logistics and distribution sectors. The proposed allocation of the borough's most suitable sites for industrial intensification is designed to focus development to the most suitable locations for additional industrial capacity.

Previous assessment considered the suitability of the sites for delivering only residential uses. Where sites may also be considered to be suitable for the delivery of other (non-industrial) uses, this is to be tested through the Industrial Masterplan Approach (as identified for relevant sites within the Site Allocations Document). For sites where such work is sufficiently advanced, detail of design-led capacity is included in the allocation wording within the Site Allocations Document.

Table 8 provides detailed reasons for the selection of these alternatives in 2021. All other alternatives⁷¹ considered at the Regulation 18 stage have been taken forward into the Regulation 19 Site Allocations Document because they are either Strategic or Critical sites needed to deliver the strategic priorities of the Local Plan. Please note that some sites assessed at the Regulation 18 stage have since been combined during the Regulation 19 Site Allocations Document preparation. See Table 25 in Section 7.1 for further details.

⁷¹ With the exception of Chingford Station Car Park and Bus Terminal rejected as a reasonable alternative because it is considered too small.

Table 8: Additional Sites Selected at the Regulation 19 Stage as Site Allocations

Site Ref	Site Name	Reason for Selection
WND02 now SA68	Highams Park Industrial Estate	<p>To direct the delivery of additional industrial floorspace to the most suitable locations as identified in the Employment Land Audit as having supportive conditions to enable industrial intensification on the site.</p> <p>Identified capacity of an additional 18,800 sqm of floorspace (typology dependant). Site is well-integrated to the town centre and local transport and provision of local jobs in this location will support sustainable movement and the delivery of 15 minute neighbourhoods.</p>
WND03 now SA69	Blackhorse Lane SIL3 (formerly Uplands)	<p>To direct the delivery of additional industrial floorspace to the most suitable locations as identified in the Employment Land Audit as having supportive conditions to enable industrial intensification on the site.</p> <p>The Employment Land Audit highlights that co-location with other employment/light industrial uses is deemed most suitable. A framework has been prepared to provide a coordinated plan across the whole of Blackhorse Lane SIL, support industrial reprovion and provide controls to protect industrial uses if development happens.</p>
WND04 now SA71	Rigg Approach SIL5	To direct the delivery of additional industrial floorspace to the most suitable locations as identified in the Employment Land Audit as having supportive conditions for industrial use.
WND15 now SA72	Lammas Road SIL6	To direct the delivery of additional industrial floorspace to the most suitable locations as identified in the Employment Land Audit as having supportive conditions for industrial use.
WND17 now SA73	Orient Way SIL7 (formerly Golden Business Park (SIL7))	To direct the delivery of additional industrial floorspace to the most suitable locations as identified in the Employment Land Audit as having supportive conditions to enable industrial intensification on the site. The site has excellent access to the M11 and Central London via A12, making it a particularly strong proposition for logistics and distribution uses. Identified capacity of an additional 16,000 sqm of floorspace (typology dependant).
WND21 now SA74	Deacon Trading Estate (Cabinet Way)	<p>To direct the delivery of additional industrial floorspace to the most suitable locations as identified in the Employment Land Audit as having supportive conditions to enable industrial intensification on the site.</p> <p>The site has excellent access to the North Circular road, making it a particularly strong proposition for logistics and distribution uses. Site proposed in a representation made to the Regulation 18 consultation.</p>

Site Ref	Site Name	Reason for Selection
2021 new site SA65	Hainault Road	<p>To direct the delivery of additional industrial floorspace to the most suitable locations as identified in the Employment Land Audit as having supportive conditions to enable industrial intensification on the site.</p> <p>Identified capacity of an additional circa 2,750 sqm of floorspace (typology dependant). Site is well-integrated to the town centre and local transport and provision of local jobs in this location will support sustainable movement and the delivery of 15 minute neighbourhoods.</p>
2021 new site SA66	Howard Road	<p>To direct the delivery of additional industrial floorspace to the most suitable locations as identified in the Employment Land Audit as having supportive conditions to enable industrial intensification on the site.</p> <p>Identified capacity of an additional c.4,500 sqm of floorspace (typology dependant). Site is well-integrated to the town centre and local transport and provision of local jobs in this location will support sustainable movement and the delivery of 15 minute neighbourhoods. Audit concludes that the site is suitable for small, light industrial or other employment (office) uses.</p>
2021 new site SA67	Barrett Road	<p>To direct the delivery of additional industrial floorspace to the most suitable locations as identified in the Employment Land Audit as having supportive conditions to enable industrial intensification on the site.</p> <p>Identified capacity of an additional c.3,000 sqm of floorspace (typology dependant). Site is well-integrated to the town centre and local transport and provision of local jobs in this location will support sustainable movement and the delivery of 15 minute neighbourhoods.</p>
2021 new site SA70	Argall Avenue SIL4	<p>To direct the delivery of additional industrial floorspace to the most suitable locations as identified in the Employment Land Audit as having supportive conditions to enable industrial intensification on the site.</p> <p>Argall Avenue is the borough's largest reservoir of industrial land, and is allocated for continued industrial use. The allocation highlights the industrial character of the SIL, and support for intensification of floorspace.</p>
2021 new site SA75	Lea Bridge Hotel Site	<p>This site was proposed in a representation made to the Regulation 18 consultation. Evidence for the suitability, availability and achievability of the site for delivering residential use was provided, and the Council in considering the evidence, agrees with this submission. As such, it is proposed for allocation.</p>

Reasonable alternative sites identified and assessed in the SA which have been rejected from inclusion within the Site Allocations Document are listed in Table 9. The potential sustainability effects of the rejected sites are presented within Appendix D and are summarised in Sections 6.4.1 and 6.4.2.

Table 9: Rejected Sites

Site Ref	Site Name
WND01	Aldriche Way Estate
WND05	Waltham Forest College
WND06	Queens Road Recreation Ground
WND07	Bus station, Leyton (LLDC)
WND08	Rail for London Ltd. Car Park, North Chingford
WND09	The Drive Estate
WND10	Thames Water Depot
WND11	Lea Valley Ice Centre
WND12	Royal Mail Sorting Office, Skeltons Lane
WND13	Leyton Motors, Coopers Lane
WND14	Garage premises, High Road Leyton
WND16	Royal Mail Sorting Office, Church Hill
WND18	Costco and Land at Harbet Road
WND19	Waltham Park Way (BEA)
WND20	Trinity Way and Avenue Business Park (BEA)
WND22	Walthamstow Business Centre

6.4.1 Sustainability Performance of the Rejected Sites

The key for potential sustainability effects is presented in Table 10:

Table 10: Key to Potential Effects Symbols

Symbol	Definitions of Significance of Effects Against the SA Objectives
++	Significant Positive Effect: the site supports the achievement of this objective; it addresses all relevant sub-objectives and could result in a potentially significant beneficial effect e.g. improved access by walking and cycling modes to a local or town centre
+	Minor Positive Effect: the site supports the achievement of this objective; it addresses some relevant sub-objectives, although it may have only a minor beneficial effect
0	Neutral Effect: the site has no impact or effect and is neutral insofar as the benefits and drawbacks appear equal and neither is considered significant

Symbol	Definitions of Significance of Effects Against the SA Objectives
?	Uncertain Effect: Uncertain or insufficient information on which to determine the assessment at this stage
-	Minor Negative Effect: the site appears to conflict with the achievement of this objective; it does not address relevant sub-objectives and may result in minor adverse effects
- -	Significant Negative Effect: the site works against the achievement of this objective; it could exacerbate relevant sub-objectives and may result in a potentially significant adverse effect e.g. loss of all or part of a designated ecological site of national importance.

An uncertain effect was identified in relation to all rejected sites in relation to 'SA Objective 11: Protect the ecological integrity of SSSI and Natura 2000 sites'. The parallel HRA screening exercise in 2020 screened in all allocations because likely significant effects could result from all sites on Natura 2000 sites. The reasons for screening in each site differs and details can be found in Appendix C. The HRA has since been updated based on the selected site allocations within the Regulation 19 Site Allocations Document (LP2).

In summary, the rejected sites generally performed positively. However, it was noticeable that there is a greater level of uncertainty within the assessment of the rejected sites. Some of the uncertain effects relate to SA15 (Improve the local economy by enabling employment developments in appropriate places) because some of the alternative sites are currently designed for employment uses (such as Borough Employment Areas or Strategic Industrial Land) and it is currently uncertain whether redeveloping those sites would result in the loss of employment space and jobs.

In contrast with the proposed site allocations, potential significant negative effects have also been identified in relation to SA12 (Maintain and enhance the quality of the green belt and open space areas for some of the alternative sites).

Potential cumulative effects of the rejected sites are identified in Appendix D. Please note that some allocation sites reference numbers have since been changed. Information about potential cumulative effects was available to inform the selection of allocation sites to be included within the Regulation 19 Site Allocations Document.

6.4.2 Potential Sustainability Effects of the Rejected Alternative Sites Assessed

Table 11 Summary of potential significant effects for Site WND01: Aldriche Way Estate

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	+	-	-	-	0	?	0	0	+	0	?	0	0	+	+	+
Potential significant positive effects	None.															
Potential significant negative and uncertain effects	<ul style="list-style-type: none"> SA4: Site WND01 is located within 400m of an employment area and within 800m of a bus stop, but lies over 800m from the nearest station, Highams Park. A PTAL score of 2 for some areas of the site also suggests access to and services from the public transport network do not currently meet the needs of residents. Development of this site could therefore increase car use and journey lengths. It is expected that Local Plan Part 1 Policies 68: Walking and Cycling and 69: Public Transport, will help to maximise sustainable access where possible, although they are unlikely to increase rail access. Therefore, a potential significant negative effect has been identified. SA6: Site WND01 has poor access to the public transport network, and although it will be a car-free development, the ULEZ extension in 2021 will not include this site. This could encourage future residents to use private cars, exacerbating existing air quality issues. However, the exact number of dwellings and development uses on sites are currently unclear, hence an uncertain effect has been recorded for SA6. 															

Table 12 Summary of potential significant effects for Site WND05: Waltham Forest College

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	?	++	++	-	+	0	0	0	++	0	?	0	?	+	+	+
Potential significant positive effects	<ul style="list-style-type: none"> SA2: This site has access to space for formal recreation facilities, such as gym and Chestnuts Field within 400m walking distance of the site. A GP practice is also within 800m of the site, which should help to ensure residents are able to maintain a healthy lifestyle and good wellbeing. Therefore, an overall indirect significant positive effect has been recorded. SA3: This site has good access to most facilities, such several local schools, shops, place of worship and recreation space within walking distance of the site. Although a community centre is not available within walking distance, it is expected that Local Plan Part 1 Policy 96 Infrastructure and Developer Contributions could ensure that infrastructure provision is considered prior to development, and provided on site where appropriate. Therefore, a potential indirect significant positive effect has been identified. SA9: This site is not located on or nearby a locally important geological resource and is entirely previously developed land. Development of the site will also help to increase density of development in the area; hence a potential significant positive effect has been identified. 															

Potential significant negative and uncertain effects	<ul style="list-style-type: none"> SA1: The details of development for this site are currently unclear, and the number and typology of residential units is not identified. Therefore, an uncertain effect has been recorded. SA13: Site WND05 is Waltham Forest College, a locally listed building. It is unclear how development of this site could affect this local heritage asset, as although Local Plan Part 1 Policy 77 Locally Listed Buildings, aims to protect such assets, demolition is permitted in some cases. Therefore, an uncertain effect has been recorded.
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Table 13 Summary of potential significant effects for Site WND06: Queens Road Recreation Ground

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	++	++	-	0	0	0	0	++	0	?	0	0	+	?	?
Potential significant positive effects	<ul style="list-style-type: none"> SA1: Site WND06 will provide 50% affordable housing in accordance with Local Plan Part 1 Policy 24 'Delivering genuinely affordable housing', which amounts to 93 units. It could also provide 93 market housing units. The development should provide a range of different tenures and sizes of dwellings which will help to meet the market and affordable housing needs of the borough, therefore a significant positive effect has been identified. SA2: Site WND06 is <800m from St James Medical Practice, and lies adjacent to Kelmscott Leisure Centre. Thomas Gamuel Park is also within 800m of the site, which could help to ensure future residents of the site are able to maintain healthy and active lifestyles, with good wellbeing. Therefore, a potential indirect significant positive effect has been recorded. SA3: This site has good access to local services and facilities, with local schools, shops, places of worship and recreation space within 800m walking distance of the site. Site WND06 is also adjacent to Walthamstow Leisure Centre and Multisport Centre, as well as Kelmscott Secondary School. The site is currently used as a community centre, and it has been assumed that this will be retained or reprovided on site, hence a potential significant positive effect has been recorded. SA9: This site is not located on a local geological resource, and is partially previously developed land. Development of the site will also help to increase density of development in the area, hence a potential significant positive effect has been identified, although it is noted that this is of low magnitude due to the size of the site. 															
Potential significant negative and uncertain effects	<ul style="list-style-type: none"> No additional significant negative or uncertain effects. 															

Table 14 Summary of potential significant effects for Site WND07: Bus station, Leyton (LLDC)

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	?	?	?	?	+	0	0	?	++	0	?	0	0	+	?	?
Potential significant positive effects	<ul style="list-style-type: none"> SA9: This site is not located on or nearby a locally important geological resource and is entirely previously developed land. Development of the site will also help to increase density of development in the area, hence a potential significant positive effect has been identified. 															
Potential significant negative and uncertain effects	<ul style="list-style-type: none"> SA1: The details of development for this site are currently unclear, and the number and typology of residential units are not known. Therefore, an uncertain effect has been recorded. SA2: Site WND07 is adjacent to an area of open space and Lee Valley Tennis and Hockey Centre. Hackney Marshes are also within walking distance of the site. This good access to recreational areas and facilities should help to ensure residents are able to lead a healthy and active lifestyle. However, there is poor access to healthcare, with the closest GP practice (Leyton Healthcare) over 800m walking distance away, which could prevent some residents from accessing the healthcare they require. This site is also located along Ruckholt Road (an air quality focus area) and adjacent to a railway line, both of which could be sources of air and noise pollution. Local Plan Part 1 Policy 90 Air Pollution requires the development to be air quality positive which should improve local air quality. The Local Plan policy on noise, vibration and light pollution should also mitigate for any negative effects on new residents due to the location. It is uncertain how many new homes will be delivered on this site at the time of assessment and therefore it is not certain what the magnitude of poor access to healthcare facilities would be. An uncertain effect is therefore identified. SA3: The details of development for this site are currently unclear, hence the potential contribution towards or need for community facilities and services cannot be assessed. Therefore, an uncertain effect has been recorded. SA4: This site is located within walking distance of an employment area and 400m of a bus stop, however, there is poor access to the rail network and the site PTAL score of 3 suggests that public transport services are currently limited. Development of the site is therefore unlikely to aid in integrating public transport or reducing car journey lengths. However, Local Plan Part 1 Policy 64 Public Transport does require development to support and enhance public transport connectivity, which could help to maximise accessibility of the site. An overall uncertain effect is recorded. SA8: Site WND07 is located within Flood Zone 3 and in an area >75% susceptible to groundwater flooding. Development of this site could therefore adversely affect flooding in the area. Policy 93 Managing Flood Risk requires all developments to be subject to a flood risk assessment where the development may be affected by sources of flooding other than fluvial and surface water flooding. An appropriate on and off-site flood mitigation strategy will need to be provided, in accordance with this policy, in order to decrease vulnerability as well as a detailed on-site surface water management and sustainable drainage strategy with Sustainable Drainage Systems (SuDS). The development will need to achieve greenfield runoff rates for off-site discharge rates through the use of SuDS following the drainage hierarchy in the new London Plan. Due to the need for the site to pass the sequential and exception test in order to be allocated, and the need for evidence to be prepared to prove that the site can be safely designed, the potential effect is currently uncertain. 															

	<ul style="list-style-type: none"> SA15: This site is located within 800m of a borough employment area and would not result in the loss of any business floor space or industrial uses. This site should also deliver a mixed use development, although it is currently unclear if this will include new employment or business space. Therefore, an uncertain effect has been recorded. SA16: An uncertain effect has been identified, as it is currently unclear what type, if any, employment space will be provided at this site.
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Table 15 Summary of potential significant effects for Site WND08: Rail for London Ltd. Car Park, North Chingford

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	-	+	+	0	+	0	0	++	0	?	0	0	+	++	+
Potential significant positive effects	<ul style="list-style-type: none"> SA1: The site will provide 50% affordable housing in accordance with Local Plan Part 1 Policy 24 'Delivering genuinely affordable housing', which amounts to 8 units. It is assumed that the site could also provide 8 market housing units. The development should provide a range of different tenures and sizes of dwellings which will help to meet the housing needs of the borough, therefore a significant positive effect is identified. SA9: This site is located on previously developed land, and development could help to improve land use efficiency. The site is also not located within any LIGs, hence a potential significant positive effect has been identified, although it is noted that this is of low magnitude due to the size of the site. SA15: This site will deliver a mixed use development with some new employment space, which is likely to include shared workspace. The site is not within a SIL but is within 800m of a borough employment area. Therefore a significant positive effect has been identified. 															
Potential significant negative and uncertain effects	No additional significant negative or uncertain effects identified.															

Table 16 Summary of potential significant effects for Site WND09: The Drive Estate

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	-	++	0	+	0	0	0	++	0	?	0	0	+	+	+
Potential significant positive effects	<ul style="list-style-type: none"> SA1: Site WND09 will provide 50% affordable housing in accordance with Local Plan Part 1 Policy 24 'Delivering genuinely affordable housing', which amounts to 300 units. It could also provide 300 market housing units. The development should provide a range of different tenures and sizes of dwellings which will help to meet the market and affordable housing needs of the borough, therefore a significant positive effect has been identified. SA3: This site has good access to most facilities, such as several local schools, shops, place of worship and recreation space within walking distance of the site. Although a formal place of worship is not available within walking distance, it is expected that Local Plan 															

	<p>Part 1 Policy 96 Infrastructure and Developer Contributions could ensure that infrastructure provision is considered prior to development, and provided on site where appropriate. Therefore, a potential indirect significant positive effect has been identified.</p> <ul style="list-style-type: none"> SA9: This site is not located on or nearby a locally important geological resource and is entirely previously developed land. Development of the site will also help to increase density of development in the area; hence a potential significant positive effect has been identified.
Potential significant negative and uncertain effects	No additional potential negative or uncertain effects identified.

Table 17 Summary of potential significant effects for Site WND10: Thames Water Depot

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	+	-	-	0	0	0 -	?	++	0	?	--	?	0	+	+
Potential significant positive effects	<p>SA1: Site WND10 will provide 50% affordable housing in accordance with Local Plan Part 1 Policy 24 'Delivering genuinely affordable housing', which amounts to 198 units. It could also provide 198 market housing units. The development should provide a range of different tenures and sizes of dwellings which will help to meet the market and affordable housing needs of the borough, therefore a significant positive effect has been identified.</p> <p>SA9: This site is not located on or nearby a locally important geological resource, and is entirely previously developed land. Development of the site will also help to increase density of development in the area, hence a potential significant positive effect has been identified.</p>															
Potential significant negative and uncertain effects	<ul style="list-style-type: none"> SA8: Site WND10 is located within Flood Zone 3. Development of this site could therefore adversely affect flooding in the area. However, Local Plan Part 1 Policy 86: Managing Flood Risk could help to ensure potential effects are identified prior to construction, as a sequential test and flood risk assessments must first be carried out for the site. Therefore, an overall neutral score has been given. Policy 96 'Managing Flood Risk' requires all developments to be subject to a flood risk assessment where the development may be affected by sources of flooding other than fluvial and surface water flooding. An appropriate on and off-site flood mitigation strategy will need to be provided, in accordance with this policy, in order to decrease vulnerability as well as a detailed on-site surface water management and sustainable drainage strategy with SuDS. The development will need to achieve greenfield runoff rates for off-site discharge rates through the use of SuDS following the drainage hierarchy in the new London Plan. Due to the need for the site to pass the sequential and exception test in order to be allocated, and the need for evidence to be prepared to prove that the site can be safely designed, the potential effect is currently uncertain. SA12: Site WND10 lies within the Walthamstow/Hackney Marshes area of Metropolitan Open Land. Although Local Plan Part 1 Policy 84: Green Infrastructure and the Natural Environment does aim to protect such land, development on MOL is not entirely excluded. Development of this site could therefore lead to the permanent and irreversible loss of this land, hence a potential significant negative effect has been recorded. 															

	<ul style="list-style-type: none"> SA13: Site WND10 is located outside of conservation zones and away from historic parks and gardens. However, it is within the current River Lea and Tributaries Archaeological Priority Zone. Any adverse impacts on this APZ should be identified and mitigated through Local Plan Part 1 Policy 80: Archaeological Priority Zones. There are also two locally listed Grade II buildings within 20m of the site (the former turbine house at Lea Bridge and the main office buildings for Thames Water). Whilst Policy 82: Locally-Listed Buildings aims to protect and retain these historic assets, it is unclear from this policy if the setting of the two nearby buildings will be considered. Therefore, an uncertain effect has been recorded.
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Table 18 Summary of potential significant effects for Site WND11: Lee Valley Ice Centre

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	?	+	?	-	0	0	0-	0	++	?	?	--	0	0	+	+
Potential significant positive effects	<ul style="list-style-type: none"> SA9: This site is not located on a local geological resource, and is partially previously developed land. Development of the site will also help to increase density of development in the area, hence a potential significant positive effect has been identified, although it is noted that this is of low magnitude due to the size of the site. 															
Potential significant negative and uncertain effects	<ul style="list-style-type: none"> SA1: Site WND11 will provide 50% affordable housing in accordance with Local Plan Part 1 Policy 24 'Delivering genuinely affordable housing', although it is not known at the time of assessment how many this will be. It is also unclear if there will be any market housing supplied, therefore an uncertain effect has been recorded. SA3: This site has poor access to several facilities, including local shops, places of worship and a community centre. Residents of this site may seek access to facilities in the neighbouring borough of Hackney, which is closer for some services. Local Plan Part 1 Policy 100: Infrastructure and Developer Contributions could ensure that infrastructure provision is considered prior to development, and provided on site where appropriate. The site also has access to schools and sites for recreation within walking distance of the site. However, it is currently unclear if the development of this site will lead to the loss of the current ice rink, which acts a source of formal recreation for the area. Therefore, a potential uncertain effect has been identified. SA10: This site includes and is surrounded by priority habitats, specifically, lowland grassland and broadleaf deciduous woodland. Development of this site could therefore lead to the damage and potential loss of these habitats and associated ecosystems. Local Plan Part 1 Policy 86: Biodiversity and Geodiversity aims to protect and enhance biodiversity resources within the borough. However, there are caveats within the policy which allow for destruction of habitats if appropriate mitigation and compensation measures are put in place. It is unclear if this would be the case with development at this site, hence an uncertain effect has been recorded. 															

Table 19 Summary of potential significant effects for Site WND12: Royal Mail Sorting Office, Skeltons Lane

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	++	+	+	0	+	0	0	++	0	?	0	0	++	++	++
Potential significant positive effects	<ul style="list-style-type: none"> SA2: This site has good access to healthcare and recreational facilities which are within 400m walking distance from the site. Therefore, a potential significant positive effect has been identified in relation to SA2. SA9: This site is located on previously developed land, so the development of the site could help to improve land use efficiency. The site is also not located within any LIGs, hence a potential significant positive effect has been identified, although it is noted that this is of low magnitude due to the size of the site. SA14: The site is within 400m of Bakers Arms District Centre and will therefore have a potential significant positive effect on SA14 in accordance with Local Plan Part 1 Policy 5 Management of Growth as it will provide a mixed use development site in close proximity to one of the borough's district centres. SA15: This site will deliver a mixed use development with some new employment space, which is likely to include shared workspace. The site is also located within a Borough employment area and is not in a Strategic Industrial Location. Therefore, a potential significant positive effect has been identified. SA16: The site will deliver mixed use development including flexible employment space which will help maintain stable levels of employment in the borough. It has good accessibility to the public transport network and therefore to other employment areas in the borough. It also has the potential to support high quality employment in a range of uses due to the size and scale of the site therefore a potential significant positive effect has been identified. 															
Potential significant negative and uncertain effects	No additional potential negative or uncertain effects identified.															

Table 20 Summary of potential significant effects for Site WND13: Leyton Motors, Coopers Lane

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	++	+	+	0	+	0	0	++	0	?	0	0	++	++	+
Potential significant positive effects	<ul style="list-style-type: none"> SA2: This site has good access to healthcare and recreational facilities which are within 400m walking distance from the site. Therefore, a potential significant positive effect has been identified in relation to SA2. SA9: This site is located on previously developed land, so the development of the site could help to improve land use efficiency. The site is also not located within any LIGs, hence a potential significant positive effect has been identified, although it is noted that this is of low magnitude due to the size of the site. 															

	<ul style="list-style-type: none"> SA14: The site is within 400m of Bakers Arms District Centre and will therefore have a potential significant positive effect on SA14 in accordance with Local Plan Part 1 Policy 3 Management of Growth as it will provide a mixed use development site in close proximity to one of the borough's district centres. SA15: This site will deliver a mixed use development with some new employment space, which is likely to include shared workspace. The site is also located within a Borough employment area and is not in a Strategic Industrial Location. Therefore, a potential significant positive effect has been identified.
Potential significant negative and uncertain effects	No additional potential negative or uncertain effects identified.

Table 21 Summary of potential significant effects for Site WND14: Garage premises, High Road Leyton

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	++	+	+	0	+	0	0	++	0	?	0	0	++	++	+
Potential significant positive effects	<ul style="list-style-type: none"> SA2: This site has good access to healthcare and recreational facilities which are within 400m walking distance from the site. Therefore, a potential significant positive effect has been identified in relation to SA2. SA9: This site is located on previously developed land, so the development of the site could help to improve land use efficiency. The site is also not located within any LIGs, hence a potential significant positive effect has been identified, although it is noted that this is of low magnitude due to the size of the site. SA14: The site is within 400m of Bakers Arms District Centre and will therefore have a potential significant positive effect on SA14 in accordance with Local Plan Part 1 Policy 5 Management of Growth as it will provide a mixed use development site in close proximity to one of the borough's district centres. SA15: This site will deliver a mixed use development with some new employment space, which is likely to include shared workspace. The site is also located within a Borough employment area and is not in a Strategic Industrial Location. Therefore, a potential significant positive effect has been identified. 															
Potential significant negative and uncertain effects	No additional potential negative or uncertain effects identified.															

Table 22 Summary of potential significant effects for Site WND16: Royal Mail Sorting Office, Church Hill

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	-	+	++	0	++	0	0	++	0	?	0	0	++	+	+
Potential significant positive effects	<ul style="list-style-type: none"> SA4: Site WND16 has access to East London Office Centre employment area, a bus stop and Walthamstow Central tube and train station within walking distance. A PTAL score of 6a across the entire site also suggests that there are frequent services from these transport links. These good public transport links should help to ensure that future residents of the site are able to access services and employment they require, without the need for a private car. Therefore, a potential significant positive effect has been identified. SA6: This site has good public transport links, and will be included within the expansion of the ULEZ in 2021. Development of this site could therefore aid in reducing private car use and reducing associated emissions, thus indirectly aiding to improve air quality. Therefore, a potential significant positive effect has been identified. SA9: This site is not located on or nearby a locally important geological resource, and is entirely previously developed land. Development of the site will also help to increase density of development in the area; hence a potential significant positive effect has been identified. SA14: Site WND16 is located within Walthamstow Town Centre and will provide 102 new dwellings, hence development of this site is likely to help in increasing the vitality and viability of the area. Therefore, a potential significant positive effect has been recorded. 															
Potential significant negative and uncertain effects	No additional potential negative or uncertain effects identified.															

Table 23 Summary of potential significant effects for Site WND19: Waltham Park Way (BEA)

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	+	+	?	0	0	0	?	++	0	?	0	0	0	?	?
Potential significant positive effects	SA9: The site is PDL and will not have any effect on geological resources. The redevelopment of the site therefore supports the achievement of SA9 and should result in a significant positive effect.															
Potential significant negative and uncertain effects	<ul style="list-style-type: none"> SA4: The site is located on a borough employment area and is located near to another borough employment areas (also being considered as an allocation site option WND20). The site has good access to a bus stop but a low PTAL score suggesting services are limited. It is more than 800m from a train station. It is difficult to see how residents of the development will be able to access local facilities/services and employment without investment in improved public transport and walking and cycling access. Therefore an uncertain effect is identified. SA8: The site lies within fluvial flood zone 2 but is in an area with a low (<25% risk of groundwater flooding). Local Plan Part 1 Policy 93 Managing Flood Risk requires all developments to be subject to a flood risk assessment where the development may be affected 															

	<p>by sources of flooding. An appropriate on and off-site flood mitigation strategy will need to be provided, in accordance with this policy, in order to decrease vulnerability as well as a detailed on-site surface water management and sustainable drainage strategy with Sustainable Drainage Systems (SuDS). The development will need to achieve greenfield runoff rates for off-site discharge rates through the use of SuDS following the drainage hierarchy in the new London Plan and with this mitigation in place a neutral effect is identified overall. Due to the need for the site to pass the sequential and exception test in order to be allocated, and the need for evidence to be prepared to prove that the site can be safely designed, the potential effect is currently uncertain.</p> <ul style="list-style-type: none"> SA15: This site will deliver a mixed use development with some new employment space. The site is currently a borough employment area. It is expected to be redeveloped with no net loss of non-residential floor space. The location does not have good public transport access and therefore a minor negative effect is identified. SA16: This site will deliver a mixed use development with some new employment space, which is likely to include shared workspace. There will be no net loss in non-residential use on the site. Although the site is within 800m of the nearest Borough employment area it has a poor PTAL score currently which may mean that accessing employment opportunities further afield for residents may be limited. It is uncertain whether the redevelopment of this site will maintain stable levels of employment in the borough as it is proposed that it will replace a business park with flexible workspace and it is not known if this will result in maintaining or increasing employment on this site.
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Table 24 Summary of potential significant effects for Site WND22: Walthamstow Business Centre

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	-	++	-	0	0	0	0	++	0	?	0	0	+	++	+
Potential significant positive effects	<ul style="list-style-type: none"> SA3: This site has good access to most facilities, such several local schools, shops, place of worship and recreation space within walking distance of the site. Although a formal place of worship and recreation facilities are not available within walking distance, it is expected that Local Plan Part 1 Policy 96 Infrastructure and Developer Contributions could ensure that infrastructure provision is considered prior to development, and provided on site where appropriate. SA9: This site is not located on or nearby a locally important geological resource and is entirely previously developed land. Development of the site will also help to increase density of development in the area; hence a potential significant positive effect has been identified. SA15: Site WND22 is located within walking distance of an employment area and Wood Street District Centre, and is not located on strategic industrial land. Development of this site could also deliver new employment space, which is likely to include shared workspace. Therefore, a potential significant positive effect has been identified. 															
Potential significant negative and uncertain effects	No additional potential negative or uncertain effects identified.															

7 Assessment of Selected Site Allocations

7.1 Introduction

This section presents the potential significant and uncertain effects of the allocation sites proposed within the Site Allocations Document (LP2). The sites are mainly clustered in the strategic locations and the findings of the assessments are presented by strategic location in Tables 25 to 98. There are five sites which fall outside of a strategic location.

Changes were made to some proposed site allocations after the Regulation 18 consultation. These changes related to site boundaries or to the proposed use of the site. Details are shown in Table 25.

Table 25: Changes to Site Allocations in Regulation 19 Stage

Site Ref	Site Name	Description of Changes
SA03	Bywaters, Leyton and Osier Way	Boundary change. Combined into one site.
SA21	Avenue Road Estate and Thorne Close	Boundary change. Combined into one site.
SA39	Hylands Road Phase 1 and 2	Boundary change. Combined into one site.
SA55	UKPN, Budgens and Gresham Works North Chingford	Boundary change. Combined into one site.
SA68	Highams Park Industrial Estate	Boundary change
SA69	Blackhorse Lane SIL3	Boundary change
SA71	Rigg Approach SIL5	Proposed Change of Use
SA72	Lammas Road SIL6	Proposed Change of Use
SA73	Orient Way SIL7	Proposed Change of Use
SA74	Deacon Trading Estate (Cabinet Way)	Proposed Change of Use

All sites have been subject to assessment against the SA Framework of objectives. Summaries of the significant effects (including uncertain effects) are provided in this section with reference to the SA objectives in Table 2. Mitigation measures to offset potential negative or uncertain effects can be found within the detailed assessments in Appendix C and are discussed in Section 9. Some mitigation measures put forward in the Regulation 18 stage in 2020 have since been incorporated into the wording of the Site Allocations Document and where this is the case this have been identified in Section 9.

The assessment of proposed site allocations was informed by the results of a RAG assessment for each location. This used GIS to add context and clear indication of the impacts which could arise from the site allocations. The methodology for this is described within Section 2.4 of this report. The RAG results are detailed within Appendix C. The key for the potential effects is presented in Table 9 in Section 6.4.

7.2 Assessment Findings

7.2.1 Potential Significant Effects Common to Most Sites

There are a number of significant effects which are common to most of the sites. Whilst these potential effects are shown as symbols on the summary tables, the description of these common effects have been omitted from the tables below and are described here in order to reduce repetition.

The assessment has identified that all of the site allocations which are anticipated to deliver some affordable housing could result in a potential significant positive effect in relation to 'SA Objective 1: Meet local housing needs through the provision of a range of tenures and sizes of new dwellings'. The only sites which are not predicted to result in this effect are those which will not provide any affordable housing or residential uses.

7.2.2 SA11: Potential Effects on European Sites

The allocation sites contained within the Local Plan (Part 2) Site Allocations Document were screened for Likely Significant Effects on European sites in October 2021 in the separate HRA. All of the site allocations were screened in for further assessment in the HRA (the appropriate assessment stage of the HRA). The results of the HRA screening were:

- LSEs identified for all allocation sites in relation to air quality on Epping Forest Special Area of Conservation (SAC);
- LSEs identified for all allocation sites in relation to recreation on Epping Forest SAC from all site allocations (apart from SA47 Cork Tree Retail Park, SA68 Highams Park Industrial Estate, and SA70 Argall Avenue SIL4 on which no residential use is proposed);
- LSEs identified in relation to urbanisation effects on Epping Forest SAC from the following allocation sites:
 - SA15 The Territorial Army Centre;
 - SA16 Whipps Cross University Hospital;
 - SA19 Tesco, Leytonstone;
 - SA39 Hylands Road Phase 1 and 2;
 - SA40 Crown Lea;
 - SA42 Travis Perkins;
 - SA52 Motorpoint, Sewardstone Road;
 - SA56 Chingford Library and Assembly Hall ;
 - SA57 North City Autos, Chingford;
 - SA58 Royal Epping Forest Golf Club; and
 - SA62 Pear Tree House.

- LSE identified for site allocation SA69 Blackhorse Lane SIL3 in relation to recreation and urbanisation on Lee Valley SPA and Ramsar site.

With regards to potential air quality effects, an air quality assessment has been undertaken for the HRA which identified that growth in Waltham Forest resulting from the Local Plan (Parts 1 and 2) could increase air pollution on roads within 200m of Epping Forest SAC. An air quality mitigation strategy has therefore been developed which includes measures to reduce traffic and air pollution and models the efficacy of mitigation on air quality in these areas. The air quality mitigation strategy is currently being consulted on with Natural England.

The appropriate assessment in the HRA relation to potential urbanisation effects on Epping Forest SAC has put forward mitigation in the form of development guidelines for the allocation sites listed above which have been incorporated into the Local Plan (Part 2) Site Allocations Document. Policy 83 The Epping Forest and the Epping Forest Special Area of Conservation within the Local Plan Part 1 also provides mitigation for development within Waltham Forest in order to avoid potential adverse effects from urbanisation on Epping Forest SAC:

“C. Planning applications for development and allocations within 500m⁷² of the Epping Forest SAC must demonstrate through project level HRA that the development will not generate adverse urban effects on the integrity of the SAC.”

With regards to potential recreation effects on Epping Forest, a package of measures is being developed by the London Borough of Waltham Forest in partnership with Natural England, the City of London, Conservators of Epping Forest and neighbouring authorities in order to protect Epping Forest SAC. The mitigation measures are referred to within Local Plan Part 1 Policy 81 and include a combination of contributions to SAMMs (Strategic Access Monitoring and Management Strategy) and (Suitable Alternative Natural Green Space). A SANGS Strategy and a Mitigating the Impact of Development on SAC SPD are being prepared at the time of writing.

The appropriate assessment of allocation site SA69 identified that increased noise levels within the site during the sensitive winter period, particularly during construction, could disturb the designated bird species within the SPA/Ramsar. Therefore, a risk of an adverse effect on the integrity of the Lee Valley SPA/Ramsar could not be ruled out, but Local Plan Part 1 Policy 84 The Lee Valley Regional Park provides suitable mitigation which will address potential urban effects in relation to developments at Blackhorse Lane:

“F. Planning applications for development at Blackhorse Lane will need to be accompanied by a project level HRA to ensure the development will not generate adverse urban effects on the integrity of the Lee Valley SPA and Ramsar.”

On the basis of the mitigation measures being developed in consultation with Natural England and the City of London Conservators of Epping Forest, the requirements of policies within LP1, and the mitigation wording added to relevant site allocations within the Local Plan (Part 2) Site Allocations Document, the appropriate assessment has concluded that there will be no adverse effects on European sites resulting from the Waltham Forest Local Plan (Part 2) alone and in combination.

⁷² Please note that this distance is proposed to be modified to 400m as agreed with Natural England and the City of London, Conservators of Epping Forest in a meeting on 13th October 2021.

7.3 Assessment Findings

7.3.1 Lea Bridge and Church Lane

Table 26 Summary of potential significant effects for Site SA06: Lea Bridge Station Sites

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	--	-	-	0	0	0	0	+	+	0	0	0	0	+	+
Potential significant positive effects	No additional potential negative or uncertain effects identified.															
Potential significant negative and uncertain effects	<ul style="list-style-type: none"> SA2: This site has poor access to recreation sites, although the closest GP Practice, Seymour Medical Centre is within 800m walking distance. This site is spread across a road junction and situated next to a train line. Future residents could therefore be permanently impacted by noise and light pollution. Air pollution could also adversely impact the health of future residents, due to the location of this site across Lea Bridge Road, an air quality focus area. However, Local Plan Part 1 Policy 90 Air Pollution requires the development to be air quality positive which should improve local air quality. The Local Plan policy on noise, vibration and light pollution should also mitigate for any negative effects on new residents due to the location. Due to the poor access to recreation, a significant negative effect is identified. 															

Table 26 Summary of potential significant effects for Site SA05: Lea Bridge Gasholders

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	+	+	-	?	+	0	0	0	++	0	0	0	0	0	?	+
Potential significant positive effects	<ul style="list-style-type: none"> SA9: This site is not located on or nearby a locally important geological resource, and is partially previously developed land. Development of the site will also help to increase density of development in the area. The site could include some contaminated land, as the area was previously a gas works. However, Local Plan Part 1 Policy 95 Contaminated Land, should ensure such land is assessed and remediated where required, hence a potential significant positive effect has been identified. 															
Potential significant negative and uncertain effects	<ul style="list-style-type: none"> SA4: This site is not located within walking distance of an employment area or train station, and the site PTAL score of 2 would suggest that public transport links are currently poor. The site is within walking distance of a town or district centre. Development of the site is therefore unlikely to aid in integrating public transport or reducing car journey lengths. Local Plan Part 1 Policy 64 Public Transport does require development to support and enhance public transport connectivity, which could help to maximise accessibility of the site. However, it is not certain that this can be achieved on this site and therefore an uncertain effect is identified. 															

	<ul style="list-style-type: none"> SA15: The site is over 800m from Markhouse Corner Neighbourhood centre, although less than 800m from Heybridge Way employment area. Site SA05 is partially located on strategic industrial land, and it is currently unclear if this will be retained through development. Policy 26: Safeguarding and Managing Strategic Industrial Locations (SIL) does aim to do so, although the removal of SIL is not explicitly ruled out. Therefore, an uncertain effect has been recorded.
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Table 27 Summary of potential significant effects for Site SA07: Former Leyton F.C. Football Ground

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	++	+	-	+	0	0	0	++	0	0	0	0	0	++	+
Potential significant positive effects	<ul style="list-style-type: none"> SA2: This site currently has areas of both formal and informal recreation within 800m walking distance of the site. A new GP surgery will also be provided alongside development at the site, which could help to improve access to healthcare for residents of SA07 as well as those in the surrounding area. Therefore, an indirect potential significant positive effect has been identified in relation to SA2. SA9: This site is not located on or nearby a locally important geological resource, and is entirely previously developed land. Development of the site will also help to increase density of development in the area; hence a potential significant positive effect has been identified. SA15: All sites are expected to provide some flexible employment space. This site is not located on any strategic industrial land, and is located adjacent to Heybridge Way employment area. It is also within 400m walking distance of the Markhouse Corner neighbourhood centre. Development of this site will also help to increase mixed use density in the area. Therefore, a potential significant positive effect has been identified. 															
Potential significant negative and uncertain effects	No additional potential negative or uncertain effects identified.															

Table 28 Summary of potential significant effects for Site SA08: Church Road / Estate Way LSIS

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	+	?	-	+	0	0	0	++	0	0	0	0	0	++	+
Potential significant positive effects	<ul style="list-style-type: none"> SA9: This site is not located on a local geological resource and is entirely previously developed land. Development of the site will also help to increase density of development in the area, hence a potential significant positive effect has been identified, although it is noted that this is of low magnitude due to the size of the site. SA15: All sites are expected to provide some flexible employment space. This site is not located on any strategic industrial land, and is located within 400m of Heybridge Way employment area. It is also within 800m walking distance of the Markhouse Corner neighbourhood centre. Development of this site will also help to increase mixed use density in the area. Therefore, a potential significant positive effect has been identified. 															

Potential significant negative and uncertain effects	<ul style="list-style-type: none"> SA3: This site has good access to some facilities, such as Markhouse Neighbourhood centre, a primary school and place of worship. However, some of these facilities are currently on site, and it is unclear if development of the site will lead to the loss of these services. Therefore, an uncertain effect has been recorded.
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Table 29 Summary of potential significant effects for Site SA71: Rigg Approach SIL5

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	?	-	-	0	+	0	0	0	+	0	0	0	0	0	++	+
Potential significant positive effects	<ul style="list-style-type: none"> SA15: The site is over 800m from Markhouse Corner Neighbourhood centre and Heybridge Way employment area. Development will be expected to provide replacement SIL compliant industrial floorspace capacity and should look to provide an uplift. A potential significant positive effect is therefore identified. 															
Potential significant negative and uncertain effects	<ul style="list-style-type: none"> SA1: Intensification of industrial floorspace is proposed, with the introduction of other uses subject to the two-stage industrial masterplan process. Uncertain whether residential uses will be introduced in the future. As it is an intensification, it may bring more employment to the area and could impact housing demand in the area. The magnitude of the intensification is still unclear and therefore the effects are uncertain. 															

Table 30 Summary of potential significant effects for Site SA72: Lammas Road SIL6

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	?	-	-	0	0	0	0	0	+	0	0	0	0	0	++	+
Potential significant positive effects	<ul style="list-style-type: none"> SA15: The site is over 800m from Markhouse Corner Neighbourhood centre and Heybridge Way employment area. Development will be expected to provide replacement SIL compliant industrial floorspace capacity and should look to provide an uplift. A potential significant positive effect is therefore identified. 															
Potential significant negative and uncertain effects	<ul style="list-style-type: none"> SA1: Reprovision of industrial floorspace is proposed, with the introduction of other uses subject to the two-stage industrial masterplan process. It is therefore uncertain whether residential uses will be introduced in the future. 															

Table 31 Summary of potential significant effects for Site SA73: Orient Way SIL7

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	?	0	-	-	0	0	0	0	++	0	0	0	0	0	++	+
Potential significant positive effects	<ul style="list-style-type: none"> SA9: This site is not located on or nearby a locally important geological resource, and is entirely previously developed land. Development of the site will also help to increase density of development in the area, hence a potential significant positive effect has been identified. SA15: The site is over 800m from Markhouse Corner Neighbourhood centre and Heybridge Way employment area. This site is located on strategic industrial land. Development will be expected to provide replacement SIL compliant industrial floorspace capacity and should look to provide an uplift. A potential significant positive effect is therefore identified. 															
Potential significant negative and uncertain effects	<ul style="list-style-type: none"> SA1: Reprovision of industrial floorspace is proposed, with the introduction of other uses subject to the two-stage industrial masterplan process. It is therefore uncertain whether residential uses will be introduced in the future. 															

7.3.2 Low Hall

Table 32 Summary of potential significant effects for Site SA09: Low Hall Depot

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	-	--	-	+	0	0	0	++	0	0	0	0	0	++	+
Potential significant positive effects	<ul style="list-style-type: none"> SA9: This site is not located on a local geological resource and is partially previously developed land. Development of the site will also help to increase density of development in the area, hence a potential significant positive effect has been identified, although it is noted that this is of low magnitude due to the size of the site. SA15: Development of this site should help to deliver 16,400m² of employment space and includes some strategic industrial land. Development of this site could therefore help to maintain, if not increase, the employment space available in this area. Therefore, a potential significant positive effect has been recorded. 															
Potential significant negative and uncertain effects	<ul style="list-style-type: none"> SA3: Although this site has good access to several schools (adjacent to Barn Croft Primary and within 1km of Kelmscott Secondary) and recreation space, there is poor access to other facilities, such as shops, places of worship and a community centre. This could prevent some residents from accessing the facilities they require to meet their needs, and is unlikely to be mitigated by local plan policies, as the location of the site is on the periphery of the built environment. Hence a significant negative effect has been recorded. 															

Table 33 Summary of potential significant effects for Site SA70: Argall Avenue SIL4

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	0	-	0	++	+	+	0	-	0	0	0	--	0	?	++	++
Potential significant positive effects	<ul style="list-style-type: none"> SA4: This site has good access to a bus stop on site and while the nearest train station is more than 800m away this is because of the size of the site (from site exit Lea Bridge train station is 500m). A Borough Employment Area lies adjacent to the site. Generally, there is good access to local services and facilities, including designated cycle paths to encourage active travel options. Strategic cycle and pedestrian routes through this site will be protected and further enhanced in line with the development guidelines within LP2, aiding to increase active travel permeability both for direct users of the site and those travelling through it. SA15: The site is currently used for industrial purposes. Development will be expected to provide replacement SIL compliant industrial floorspace capacity and should look to provide an uplift. A potential significant positive effect is therefore identified. SA16: The site is currently used for industrial purposes, but development of the site would lead to the creation of further industrial floorspace and, presumably, employment. This could help to enable further employment for such sectors in an established industrial / employment area. The site has good public transport connections and therefore a potential significant positive effect is identified. 															
Potential significant negative and uncertain effects	<ul style="list-style-type: none"> SA12: This site lies within the Walthamstow/Hackney Marshes area of Metropolitan Open Land (MOL). Although Local Plan Part 1 Policy 84: Green Infrastructure and the Natural Environment does aim to protect such land, development on MOL is not entirely excluded. Development of this site could therefore lead to the permanent and irreversible loss of this land, hence a potential significant negative effect has been recorded. 															

7.3.3 Blackhorse Lane

Table 34 Summary of potential significant effects for Site SA32: 152-154 Blackhorse Road

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	+	++	++	+	+	0	0	++	0	0	0	0	+	+	+
Potential significant positive effects	<ul style="list-style-type: none"> SA3: The site is well located to many community facilities, including a community centre, recreation, town centre, places of worship, a secondary school opposite the site and a primary school within a 2 min walk. The redevelopment of the site should place new residents in an area with good provision of community facilities which should support community cohesion. SA4: The site has good access to a train station and bus stops, although the bus service may be slightly limited. It is within walking distance of primary and secondary schools (which currently have capacity) and is within 400-800m of a borough employment area. The development would be car-free and residents would have good access to facilities via sustainability transport modes. It is therefore considered that a potential significant positive effect could occur in relation to SA4. SA9: The site is PDL and will not have any effect on geological resources. The redevelopment of the site therefore supports the achievement of SA9 and should result in a significant positive effect. 															

Potential significant negative and uncertain effects	No additional potential negative or uncertain effects identified.
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Table 35 Summary of potential significant effects for Site SA34: Webbs Site

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	0	0	?	+	+	0	0	++	0	0	0	0	+	++	+
Potential significant positive effects	<ul style="list-style-type: none"> SA9: The site is PDL and will not have any effect on geological resources. The redevelopment of the site therefore supports the achievement of SA9 and should result in a significant positive effect. SA15: The site is located within Borough Employment Area (BEA) and, according to aerial photos, is currently a vacant derelict site. It is owned by the Greater London Authority. The redevelopment of this site would provide a mixed use development including flexible workspace. The redevelopment of the site would support the existing BEA. The development would address some of the key sustainability issues and therefore a potential significant positive effect is identified. 															
Potential significant negative and uncertain effects	<ul style="list-style-type: none"> SA4: Although this site has good access to a bus stop and is adjacent to a borough employment area, it has a low PTAL score suggesting that public transport reliability or services in this area are limited. The nearest train station is more than 800m away from the site. Local Plan Part 1 Policy 64 Public Transport requires major developments to support and enhance public transport connectivity across the borough and to contribute to bus services and sustainability transport infrastructure. As it is uncertain what potential there is for such improvements to be made in this area, an uncertain effect is identified. 															

Table 36 Summary of potential significant effects for Site SA35: 59-69 Sutherland Road

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	+	+	?	+	+	0	0	++	0	0	0	0	0	++	++
Potential significant positive effects	<ul style="list-style-type: none"> SA9: This site is not located on or nearby a locally important geological resource and is entirely previously developed land. Development of the site will also help to increase density of development in the area, hence a potential significant positive effect has been identified. SA15: The development of this site would lead to 5,440m² of industrial floorspace being created within an area designated as LSIS, alongside some residential development. This should help to ensure development for employment occurs within an appropriate location. SA16: The site will deliver mixed use development including 5,440m² of industrial floorspace within a designated LSIS, which should help to employment opportunities within the borough. Therefore, a potential significant positive effect has been identified. 															
Potential significant negative and uncertain effects	<ul style="list-style-type: none"> SA4: This site has good walking access to a bus stop and employment uses but is more than 800m from the nearest train station and has a low PTAL score. In order for the area to be redeveloped, investment in public transport and walking and cycling infrastructure 															

	would be needed to achieve a sustainable development and tackle poor air quality within the borough. This investment would improve current access to sustainable transport in this area but is dependent on mitigation provided by Local Plan Part 1 policies being implemented. Therefore an overall uncertain effect is identified.
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Table 37 Summary of potential significant effects for Site SA33: 1 Blackhorse Lane

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	+	++	++	+	+	0	0	++	0	0	0	0	0	+	+
Potential significant positive effects	<ul style="list-style-type: none"> SA3: This site is well located to many community facilities, including a community centre, recreation, town centre, a secondary school opposite the site and a primary school within a short walk; and is reasonably well located for a place of worship (within 800 metres). The redevelopment of the site should place new residents in an area with good provision of community facilities which should support community cohesion. SA4: This site has good access to a train station and bus stops, is within walking distance of primary and secondary schools (which currently have capacity) and is within 400m of a borough employment area. The development would be car-free and residents would have good access to facilities via sustainability transport modes. It is therefore considered that a significant positive effect could occur in relation to SA4. SA9: This site is PDL and will not have any effect on geological resources. The redevelopment of the site therefore supports the achievement of SA9 and should result in a significant positive effect. 															
Potential significant negative and uncertain effects	No additional potential negative or uncertain effects identified.															

Table 38 Summary of potential significant effects for Site SA69: Blackhorse Lane SIL3

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	?	0	?	0	?	0	0	++	0	0	?	0	+	++	+
Potential significant positive effects	<ul style="list-style-type: none"> SA1: Site SA69 will provide 2,300 new dwellings, 35% of which will be affordable in accordance with Local Plan Part 1 Policy 13 'Delivering genuinely affordable housing'. The development should provide a range of different tenures and sizes of dwellings which will help to meet the market and affordable housing needs of the borough, therefore a significant positive effect has been identified. SA9: The site is PDL for industrial use, as Uplands Business Park, and will not have any effect on geological resources. The redevelopment of the site therefore supports the achievement of SA9 and should result in a significant positive effect. 															

	<ul style="list-style-type: none"> SA15: The site is currently SIL, and a significant part of the Blackhorse Lane BEA. The development of this site for industrial use, has the potential for a significant positive effect, as it is delivering on an existing Uplands Business Site, promotes employment, intensifies industrial floorspace and represents a significant positive effect as maintaining industrial uses is a key sustainability issue.
<ul style="list-style-type: none"> Potential significant negative and uncertain effects 	<ul style="list-style-type: none"> SA2: The proposed site is greater than >800m to healthcare, formal and informal recreational facilities. The development of 2,300 new homes alongside the industrial floorspace proposed, could lead to residents unable to access the health and wellbeing services they require. It is noted that there is potential for colocation of other uses, but this is subject to the two-stage master process. Therefore, an overall uncertain effect has been recorded. SA4: This site has good walking access to a bus stop and employment uses but is more than 800m from the nearest train station and has a low PTAL score. This indicates that public transport provision is poor in the area, which could lead some to use private cars. It is noted that Policy 63: Active Travel should help to ensure there are adequate pedestrian and cycle routes to the site and could lead to a positive effect on SA4, however, uncertainty remains over the public transport provision, hence an overall uncertain effect has been recorded. SA6: This site currently has a low PTAL score but good access to a bus stop and is within a ULEZ zone, which could discourage private car use. The site is located within an air quality Focus Area (Blackhorse Lane) which has been identified as having high levels of pollution and human exposure to pollutants. Due to the scale of the site, its location within Blackhorse Lane and the industrial nature of this allocation, the development will need an Air Quality Assessment, in accordance with LP1 Policy 90: Air Pollution. It is also unclear if this site will be able to achieve the air quality positive status mandated in criterion C of policy 90, hence an overall uncertain effect has been recorded. SA12: The proposed site is large and partially located within the green belt. Development of this site could therefore have direct effects on the green belt and it's quality through both construction on site and through industrial activities once operational. Potential adverse effects could be mitigated through Policy 79: Green Infrastructure and the Natural Environment, however it is unclear if the outcomes of criterion B can be achieved on an industrial site, hence an overall uncertain effect has been recorded.

7.3.4 Leyton

Table 39 Summary of potential significant effects for Site SA02: New Spitalfields Market

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	0	?	0	+	0	0	0	++	0	0	0	0	0	++	+
Potential significant positive effects	<ul style="list-style-type: none"> SA9: This site is not located on or nearby a locally important geological resource and is entirely previously developed land. Development of the site will also help to increase density of development in the area; hence a potential significant positive effect has been identified. SA15: This site is located within walking distance of an employment area and Leyton District Centre, and is not located on strategic industrial land. Development of this site will also deliver 32,657m2 of new employment space, which is likely to include shared 															

	workspace and would not result in the loss of any business floor space or industrial uses. Therefore, a potential significant positive effect has been identified.
Potential significant negative and uncertain effects	<ul style="list-style-type: none"> SA3: The site has access to Kingsmead Primary School, Chobham Academy and sites for recreation within walking distance of the site. However, this site has poor access to some facilities, including local shops and a community centre. Residents of this site may seek access to facilities in the neighbouring borough of Hackney, which is closer for some services. Local Plan Part 1 Policy 96 Infrastructure and Developer Contributions could ensure that infrastructure provision is considered prior to development, and provided on site where appropriate, however it is uncertain whether this will be delivered. Therefore, an uncertain effect has been identified.

Table 40 Summary of potential significant effects for Site SA03: Auckland Road LSIS, Leyton

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	++	?	?	+	0	0	0	++	0	0	0	0	+	?	+
Potential significant positive effects	<ul style="list-style-type: none"> SA2: This site is <800m walking distance from Leyton GP practice, allotments, Jubilee Park, Coronation Gardens and Ive Farm Sports Ground. These facilities should aid in helping future residents to maintain a healthy and active lifestyle, as well as good wellbeing. Therefore, a potential indirect significant positive effect has been recorded. SA9: This site is not located on or nearby a locally important geological resource and is entirely previously developed land. Development of the site will also help to increase density of development in the area. However, this site was previously a sewage processing plant, hence the land and remaining infrastructure on site could be contaminated. Development here could potentially spread contamination, however, Local Plan Part 1 Policy 95 Contaminated Land should help to ensure that potential risks are identified through a site investigation and potential remediation agreed. This will include the identification of on and off site receptors and the monitoring of impacts where appropriate. Therefore, an overall significant positive effect has been identified. 															
Potential significant negative and uncertain effects	<ul style="list-style-type: none"> SA3: This site has poor access to some facilities, including local shops and a community centre but access to Newport Primary School, secondary schools and sites for recreation within walking distance. Local Plan Part 1 Policy 96 Infrastructure and Developer Contributions could ensure that infrastructure provision is considered prior to development, and provided on site where appropriate, however it is uncertain whether this will be delivered. Therefore, an uncertain effect is identified. SA4: This site is located within walking distance of an employment area, however, there is poor access to the rail and bus networks; the site PTAL score of 1b-3 would suggest that public transport links are currently poor. Development of the site is therefore unlikely to aid in integrating public transport or reducing car journey lengths. However, Local Plan Part 1 Policy 64 Public Transport does require development to support and enhance public transport connectivity, which could help to maximise accessibility of the site. It is unclear if this can be achieved at the site, therefore an uncertain effect has been recorded. SA15: Site SA03 is located within walking distance of an employment area and Leyton District Centre, however, it is also located on Locally Significant Industrial Land. Development of this site will contain residential development, and potentially reprovide 33,000m² 															

	of LSIS compliant industrial floorspace. It is unclear if this will occur on site or elsewhere in London, hence an overall uncertain effect has been recorded.
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Table 41 Summary of potential significant effects for Site SA04: The Score Centre

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	++	++	?	+	0	0	0	++	0	0	0	0	++	++	+
Potential significant positive effects	<ul style="list-style-type: none"> SA2: This site is <800m walking distance from Leyton GP practice, allotments, Jubilee Park, Coronation Gardens and Ive Farm Sports Ground. These facilities should aid in helping future residents to maintain a healthy and active lifestyle, as well as good wellbeing. Therefore, a potential significant positive effect has been recorded. SA3: This site has good access to several facilities, including local shops, schools and places of worships. There are also sites for informal and formal recreation within walking distance of the site. Therefore, potential significant positive effect has been recorded. SA9: This site is not located on or nearby a locally important geological resource and is entirely previously developed land. Development of the site will also help to increase density of development in the area, hence a potential significant positive effect has been identified. SA15: This site is located within walking distance of an employment area and Leyton District Centre, and is not located on strategic industrial land. Development of this site will also deliver 11,057m2 of new employment space, which is likely to include shared workspace and would not result in the loss of any business floor space or industrial uses. Therefore a potential significant positive effect has been identified. 															
Potential significant negative and uncertain effects	<ul style="list-style-type: none"> SA4: This site is located within walking distance of an employment area, however, there is poor access to the rail network and the site PTAL score of 2-3 would suggest that public transport links are currently poor. Development of the site is therefore unlikely to aid in integrating public transport or reducing car journey lengths. However, Local Plan Part 1 Policy 64 Public Transport does require development to support and enhance public transport connectivity, which could help to maximise accessibility of the site. It is unclear if this can be achieved at the site, therefore an uncertain effect has been recorded. 															

Table 42 Summary of potential significant effects for Site SA01: Leyton Mills Retail Park

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	0	?	0	+	0	0	0	++	+	0	0	0	+	++	+
Potential significant positive effects	<ul style="list-style-type: none"> SA9: This site is not located on or nearby a locally important geological resource and is entirely previously developed land. Development of the site will also help to increase density of development in the area, hence a potential significant positive effect has been identified. SA15: This site is located within walking distance of an employment area and Leyton District Centre, and is not located on strategic industrial land. Development of this site will also deliver 41,000m2 of new employment space, which is likely to include shared 															

	workspace and would not result in the loss of any business floor space or industrial uses. Therefore a potential significant positive effect has been identified.
Potential significant negative and uncertain effects	<ul style="list-style-type: none"> SA3: This site has poor access to some facilities, such as a community centre and open space. However, Local Plan Part 1 Policy 96 Infrastructure and Developer Contributions could ensure that infrastructure provision is considered prior to development, and provided on site where appropriate. The site also has access to Newport Primary School, Chobham Academy and formal recreation facilities within walking distance of the site. As the site is lacking access to a community centre and informal open space an uncertain effect on community cohesion and equality is identified.

7.3.5 South Leytonstone

Table 43 Summary of potential significant effects for Site SA21: Avenue Road Estate and Thornes Close

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	++	+	+	0	+	0	-	++	+	0	0	0	++	+	+
Potential significant positive effects	<ul style="list-style-type: none"> SA2: The site is currently within 400-800m of healthcare facilities and once developed this site will provide a consolidated health/ medical centre for residents, and retain the current Lime Tree Surgery, improving access to community healthcare. Both informal and formal recreation facilities are within 400-800m of the site, and the site proposes a reprovision of community infrastructure, necessary to meet the needs of Local Plan Policy 48, set out in LP1. SA9: This site is located on previously developed land, so the development of the site could help to improve land use efficiency. The site is also not located within any LIGs, hence a potential significant positive effect has been identified. SA14: The site will deliver mixed use development within walking distance <0.4km to the town centre / high street of Leytonstone. Consequently, development will help to maintain enhance the vitality and viability of this centre. It has therefore been identified as having a potential significant positive effect. 															
Potential significant negative and uncertain effects	No additional potential negative or uncertain effects identified.															

Table 44 Summary of potential significant effects for Site SA23: B&M and adjoining sites

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	+	++	-	+	0	0	0	++	0	0	0	0	0	+	+
Potential significant positive effects	<ul style="list-style-type: none"> SA3: This site is within 800m of Langthorne Park, Leyton High Road local shops and Epicentre community centre. It also has good access to several primary schools, and a secondary school. A place of worship and formal recreation facilities are also within walking distance of the site. The good accessibility to these facilities should aid residents of the site in meeting social, recreational, educational and cultural needs, hence an indirect significant positive effect has been identified. SA9: This site is not located on or nearby a locally important geological resource and is entirely previously developed land. Development of the site will also help to increase density of development in the area, hence a potential significant positive effect has been identified. 															
Potential significant negative and uncertain effects	No additional potential negative or uncertain effects identified.															

Table 45 Summary of potential significant effects for Site SA66: Howard Road

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	?	+	+	-	-	0	0	0	+	-	0	0	0	0	+	+
Potential significant positive effects	No potential significant positive effects identified.															
Potential significant negative and uncertain effects	<ul style="list-style-type: none"> SA1: The allocation would not result in the loss of any residential uses. No net-loss of industrial floorspace, with the introduction of other uses subject to the two-stage industrial masterplan process is proposed for this allocation. It is therefore not certain whether residential uses will be introduced. 															

Table 46 Summary of potential significant effects for Site SA22: Cathall Road Leisure Centre, The Epicentre Community Centre, Jubilee Centre (also known as Leytonstone Leisure Centre & West Community Centre)

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	++	++	-	+	0	0	0	++	0	0	0	0	0	++	0
Potential significant positive effects	<ul style="list-style-type: none"> SA2: The leisure centre currently present at this site will be reprovided, along with 246 new homes. This should help to ensure residents of the site as well as the surrounding area are able to access facilities to maintain good physical wellbeing. Sites for informal recreation, 															

	<p>such as Cathall Green, are also within 400m walking distance of the site and the nearest GP practice, Harrow Road Practice, is within 800m walking distance. Therefore, an indirect potential significant positive effect has been identified.</p> <ul style="list-style-type: none"> SA3: This site is within 800m of Langthorne Park, Leyton High Road local shops. It also has good access to several primary schools, and a secondary school. A place of worship and formal recreation facilities are also within walking distance of the site. This site should also provide community and leisure centre uses on site as a result of development. The good accessibility to these facilities should aid residents of the site in meeting social, recreational, educational and cultural needs, hence a potential significant positive effect has been identified SA9: This site is not located on or nearby a locally important geological resource, and is entirely previously developed land. Development of the site will also help to increase density of development in the area, hence a potential significant positive effect has been identified. SA15: This site is not located on any strategic industrial land, and is located within 600m of Howard Road employment area. It is also within 800m walking distance of the Thatched House neighbourhood centre. Development of this site will also help to increase mixed use density in the area, with 7,600m² of health and community space proposed. Therefore, a potential significant positive effect has been identified.
Potential significant negative and uncertain effects	No additional potential negative or uncertain effects identified.

7.3.6 Leytonstone Town Centre

Table 47 Summary of potential significant effects for Site SA17: Joseph Ray Road

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	++	++	++	+	++	0	0	++	0	0	0	0	+	++	++
Potential significant positive effects	<ul style="list-style-type: none"> SA2: This site is <800m walking distance from the Allum GP practice and Wanstead Park, an area which contains both formal and informal recreation facilities. These facilities should aid in helping future residents to maintain a healthy and active lifestyle, as well as good wellbeing. Therefore, a potential indirect significant positive effect has been recorded. SA3: This site has good access to a variety of facilities, including Leytonstone District Centre, George Tomlinson Primary School, a secondary school, church, youth centre and Wanstead Flats within walking distance from the site. This should enable future residents of the site to access the educational, cultural, and social services they require as a result of development for the site. It is noted that there is currently a lack of access to formal recreation facilities, however new facilities are due to open soon. Therefore, a potential significant positive effect has been recorded for this SA objective. 															

	<ul style="list-style-type: none"> SA4: This site is currently an employment area, with a bus stop and Leytonstone High Road tube station within 400m walking distance. A PTAL score of 5-6a for the site also suggests that there are frequent services from these transport links. These good public transport links should help to ensure that future residents of the site are able to access services and employment they require, without the need for a private car. Therefore, a potential significant positive effect has been identified. SA6: This site has good public transport links, and will be included within the expansion of the ULEZ in 2021. Development of this site could therefore aid in reducing private car use and reducing associated emissions, thus indirectly aiding to improve air quality. Therefore, a potential significant positive effect has been identified. SA9: This site is not located on or nearby a locally important geological resource, and is entirely previously developed land. Development of the site will also help to increase density of development in the area, hence a potential significant positive effect has been identified. SA15: This site will deliver a mixed use development with 8,041m² of new industrial floorspace. The site is also a borough employment area and would not result in the loss of any business floor space or industrial uses and therefore a potential significant positive effect has been identified. SA16: A potential significant positive effect has been identified, as this site will provide 8,041m² of new industrial floorspace, alongside residential development. There are also good public transport links to the site, evidenced by a PTAL score of 5 for the site. Therefore, an overall significant positive score has been recorded.
Potential significant negative and uncertain effects	No additional potential negative or uncertain effects identified.

Table 48 Summary of potential significant effects for Site SA18: Church Lane Car Park, Leytonstone

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	++	++	++	0	++	0	0	++	0	0	0	0	+	?	?
Potential significant positive effects	<ul style="list-style-type: none"> SA2: This site is <800m walking distance from the Allum GP practice and Wanstead Park, an area which contains both formal and informal recreation facilities. This site also lies adjacent to the Church Lane Community Garden. These facilities should aid in helping future residents to maintain a healthy and active lifestyle, as well as good wellbeing. Therefore, a potential indirect significant positive effect has been recorded. SA3: This site has good access to a variety of facilities, including Leytonstone District Centre, George Tomlinson Primary School, a secondary school, church, youth centre and Wanstead Flats within walking distance from the site. This should enable future residents of the site to access the educational, cultural, and social services they require as a result of development for the site. Therefore, a potential significant positive effect has been recorded for this SA objective. SA4: This site is within walking distance of Joseph Road employment area, with a bus stop and Leytonstone High Road tube station within 400m walking distance. A PTAL score of 6a for the site also suggests that there are frequent services from these transport links. 															

	<p>These good public transport links should help to ensure that future residents of the site are able to access services and employment they require, without the need for a private car. Therefore, a potential significant positive effect has been identified.</p> <ul style="list-style-type: none"> SA6: This site has good public transport links, and will be included within the expansion of the ULEZ in 2021. Development of this site could therefore aid in reducing private car use and reducing associated emissions, thus indirectly aiding to improve air quality. Therefore, a potential significant positive effect has been identified. SA9: This site is not located on or nearby a locally important geological resource, and is entirely previously developed land. Development of the site will also help to increase density of development in the area; hence a potential significant positive effect has been identified.
Potential significant negative and uncertain effects	<ul style="list-style-type: none"> SA15: This site is located within 800m of a borough employment area and would not result in the loss of any business floor space or industrial uses. This site should also deliver a mixed use development, although it is currently unclear if this will include new employment space. Therefore, an uncertain effect has been recorded. SA16: An uncertain effect has been identified, as it is currently unclear what type, if any, employment space will be provided at this site.

Table 49 Summary of potential significant effects for Site SA20: Matalan, Leytonstone

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	++	++	++	+	++	0	0	++	0	0	0	0	+	?	?
Potential significant positive effects	<ul style="list-style-type: none"> SA2: This site is <800m walking distance from the Allum GP practice and Wanstead Park, an area which contains both formal and informal recreation facilities. These facilities should aid in helping future residents to maintain a healthy and active lifestyle, as well as good wellbeing. Therefore, a potential indirect significant positive effect has been recorded. SA3: This site has good access to a variety of facilities, including Leytonstone District Centre, George Tomlinson Primary School, a secondary school, church, youth centre and Wanstead Flats within walking distance from the site. This should enable future residents of the site to access the educational, cultural, and social services they require as a result of development for the site. Therefore, a potential indirect significant positive effect has been recorded for this SA objective. SA4: This site does not have an employment area within walking distance of the site, however, the site does have good access to public transport, with a bus stop and Leytonstone tube station both within 400m. Services from these transport links are also good, as evidenced by a PTAL score of 6a for the site. This should ensure that residents are able to access services and facilities they require via public transport, thus reducing private car journeys. Therefore, a potential significant positive effect has been identified in relation to SA4. SA6: This site has good public transport links, and will be included within the expansion of the ULEZ in 2021. Development of this site could therefore aid in reducing private car use and reducing associated emissions, thus indirectly aiding to improve air quality. Therefore, a potential significant positive effect has been identified. SA9: This site is not located on or nearby a locally important geological resource, and is entirely previously developed land. Development of the site will also help to increase density of development in the area; hence a potential significant positive effect has been identified. 															

Potential significant negative and uncertain effects	<ul style="list-style-type: none"> SA15: This site is located within 400m of a borough employment area and would not result in the loss of any business floor space or industrial uses. This site should also deliver a mixed use development, although it is currently unclear if this will include new employment space. Therefore, an uncertain effect has been recorded. SA16: An uncertain effect has been identified, as it is currently unclear what type, if any, employment space will be provided at this site.
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Table 50 Summary of potential significant effects for Site SA19: Tesco, Leytonstone

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	++	++	+	0	+	-	0	++	0	0	0	0	++	++	+
Potential significant positive effects	<ul style="list-style-type: none"> SA2: This site is <400m walking distance from the Green Man Medical Centre and Wanstead Park, an area which contains both formal and informal recreation facilities. These facilities should aid in helping future residents to maintain a healthy and active lifestyle, as well as good wellbeing. Furthermore, development of the site will be encouraged to provide publicly accessible open spaces. Therefore, a potential indirect significant positive effect has been recorded. SA3: This site has good access to a variety of facilities, including Leytonstone District Centre, primary and secondary schools, places of worship, youth centre and Henry Reynolds Garden and Wanstead Flats within walking distance from the site. Development of the site will also include educational and community uses on site. This should enable future residents of the site to access the educational, cultural, and social services they require as a result of development for the site. Therefore, a potential indirect significant positive effect has been recorded for this SA objective. SA9: This site is not located on or nearby a locally important geological resource, and is entirely previously developed land. Development of the site will also help to increase density of development in the area; hence a potential significant positive effect has been identified. SA14: This site is located within Leytonstone District Centre and a site requirement includes the need to create an active frontage onto Leyton High Road, hence development of this site could contribute to the vitality and viability of this town centre area. Therefore, a potential significant positive effect has been recorded, although it is noted that this is of low magnitude due to the size of the site. SA15: This site will deliver a mixed use development with 14,000m² of new retail and town centre floorspace, which is likely to support local jobs. Although the site is not within walking distance of a borough employment area, it would increase business floor space within the borough and would not result in the loss of industrial uses. Therefore a potential significant positive effect has been identified. 															
Potential significant negative and uncertain effects	No additional potential negative or uncertain effects identified.															

7.3.7 Whipps Cross

Table 51 Summary of potential significant effects for Site SA16: Whipps Cross University Hospital

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	+	?	?	0	-	0	0	++	0	0	0	0	0	-	+
Potential significant positive effects	<ul style="list-style-type: none"> SA9: This site is located on previously developed land, so the development of the site could help to improve land use efficiency. The site is also not located within any LIGs, hence a potential significant positive effect has been identified, although it is noted that this is of low magnitude due to the size of the site. 															
Potential significant negative and uncertain effects	<ul style="list-style-type: none"> SA3: The site has good access to primary and secondary schools which are within 1km and to informal recreation which is under 400m away. It is also within 400-800m to a shopping frontage, place of worship and formal recreation. However, it is not easily accessible to a town or local centre or to a community centre which are more than 800m walking distance. Local Plan Part 1 Policy 96 'Infrastructure and Developer Contributions' states that the Local Planning Authority will support development proposals that provide adequate contributions towards physical, social and community, green and transport infrastructure to meet the needs associated with the development. Therefore, new community facilities could potentially be provided as part of the redevelopment of this site although it is uncertain that they could be delivered. Distance of the site to a town centre cannot be improved. As access to some facilities is currently lacking an uncertain effect is identified because the provision of new facilities would be needed to achieve a positive effect and that is reliant on implementation of Local Plan Part 1 Policy 96 Infrastructure and Developer Contributions as well as Local Plan Part 1 Policy 47 Social and Community Infrastructure. SA4: The site is within 400m of a bus stop but has poor access to an employment area which is within 400-800m walking distance and to a train or tube station which is over 800m away. It also has a low PTAL score. Therefore, a potential significant negative effect has been identified, although it is noted that future improved transport access for example via the new Elizabeth Line to the south (as per the Vision of Local Plan Part 1) could modify the predicted effect to a positive one. Such an increase could be contributed to by the development via Local Plan Part 1 Policy 64 Public Transport but it's not certain that this could be delivered. An uncertain effect is therefore identified. 															

Table 52 Summary of potential significant effects for Site SA15: The Territorial Army Centre

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	+	+	+	0	+	0	+	++	0	0	0	0	0	+	+
Potential significant positive effects	<ul style="list-style-type: none"> SA9: This site is located on previously developed land, so the development of the site could help to improve land use efficiency. The site is also not located within any LIGs, hence a potential significant positive effect has been identified, although it is noted that this is of low magnitude due to the size of the site. 															
Potential significant	No additional potential negative or uncertain effects identified.															

negative and uncertain effects	
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7.3.8 Bakers Arms

Table 53 Summary of potential significant effects for Site SA12: Stanley Road Car Park

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	+	+	+	0	+	0	0	++	0	0	0	0	+	?	?
Potential significant positive effects	<ul style="list-style-type: none"> SA9: This site is located on previously developed land, so the development of the site could help to improve land use efficiency. The site is also not located within any LIGs, hence a potential significant positive effect has been identified, although it is noted that this is of low magnitude due to the size of the site. 															
Potential significant negative and uncertain effects	<ul style="list-style-type: none"> SA15: The site is located within a Borough employment area and would not result in the loss of any business floor space or industrial uses. This site will also deliver a mixed use development alongside residential development, however, the precise nature of the other uses to be developed here are currently unknown, hence an overall uncertain score has been recorded. SA16: The site will deliver mixed use development, however it is unclear if this will include flexible employment space which could help maintain stable levels of employment in the borough. It has the potential to support high quality employment in a range of industries and services but this will be limited due to the size of the site. Overall, an uncertain effect has been recorded until further development details are known. 															

Table 54 Summary of potential significant effects for Site SA75: Lea Bridge Hotel Site

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	+	-	-	?	0	0	0	0	++	0	0	0	0	0	-	+
Potential significant positive effects	<ul style="list-style-type: none"> SA9: This site is located on previously developed land, so the development of the site could help to improve land use efficiency. The site is also not located within any LIGs, hence a potential significant positive effect has been identified, although it is noted that this is of low magnitude due to the size of the site. 															
Potential significant negative and uncertain effects	<ul style="list-style-type: none"> SA4: This site is located within walking distance of an employment area and offers good access to bus transport links. However, there is poor access to train networks and a low PTAL score would suggest access to public transport is currently poor. Local Plan Part 1 Policy 64: Public Transport does require development to support and enhance public transport connectivity, which could help to maximise accessibility of the site. It is unclear if this can be achieved at the site, therefore an uncertain effect has been recorded. SA15: This site will deliver a mixed use development with some new employment space. However, this site is not well located with regards to public transport and therefore an uncertain effect is identified. 															

Table 55 Summary of potential significant effects for Site SA11: TESCO, Bakers Arms

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	+	++	++	0	++	0	0	++	0	0	0	0	+	++	+
Potential significant positive effects	<ul style="list-style-type: none"> SA3: The site is highly accessible to community facilities and is within 400m or less of the local centre, a place of worship, formal recreation facilities and a community centre. It is also located within 1km to primary and secondary schools and informal recreation. Therefore, a significant positive effect has been recorded. SA4: The site is located off the A112 (Leyton High Road) and is easily accessible to a range of sustainable transport links i.e. 400m of a bus stop and within 800m of Leyton Midland Road Overground Station. It is also located within 400m of an employment site and should include some employment use. Therefore, a significant positive effect has been recorded. SA6: The site is located adjacent to one of the borough's Air Quality focus areas (Leyton High Road) which has been identified as having high levels of pollution and human exposure so in line with Local Plan Part 1 Policy 90 Air Pollution the development should include measures in the design to improve the existing air quality in the area. The site has good access to a train and bus station, with both located within 800m of the site. The expansion of the ULEZ in October 2021 will also include this site and the site will be a car-free development so no parking will be provided on site which will help to reduce the reliance on private cars and associated emissions. Overall, the site supports the achievement of this objective and is considered to have a potential significant positive effect. SA9: This site is located on previously developed land, so the development of the site could help to improve land use efficiency. The site is also not located within any LIGs, hence a potential significant positive effect has been identified, although it is noted that this is of low magnitude due to the size of the site. SA15: This site will deliver a mixed use development with residential units and re-provision of retail floorspace. The site is also located within a Borough employment area and would not result in the loss of any business floor space or industrial uses and therefore a potential significant positive effect has been identified. 															
Potential significant negative and uncertain effects	No additional potential negative or uncertain effects identified.															

Table 56 Summary of potential significant effects for Site SA13: 806 Community Place, High Road Leyton

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	+	++	++	0	++	0	0	++	0	0	0	0	+	0	0
Potential significant positive effects	<ul style="list-style-type: none"> SA3: The site is highly accessible to community facilities, with reprovion planned on site, and is within 400m or less of the local centre, a place of worship and formal recreation facilities. It is also located within 1km to primary and secondary schools and informal recreation. Therefore, a significant positive effect has been recorded. SA4: The site is located off the A112 (Leyton High Road) and is easily accessible to a range of sustainable transport links i.e. 400m of a bus stop and within 800m of Leyton Midland Road Overground Station. It is also located within 400m of an employment site. Therefore a significant positive effect has been recorded. SA6: The site is located adjacent to one of the borough's Air Quality focus areas (Leyton High Road) which has been identified as having high levels of pollution and human exposure so in line with Local Plan Part 1 Policy 90 Air Pollution the development should include measures in the design to improve the existing air quality in the area. The site has good access to a train and bus station, with both located within 800m of the site. The expansion of the ULEZ will also include this site and the site will be a car-free development so no parking will be provided on site which will help to reduce the reliance on private cars and associated emissions. Overall, the site supports the achievement of this objective and is considered to have a potential significant positive effect. SA9: This site is located on previously developed land, so the development of the site could help to improve land use efficiency. The site is also not located within any LIGs, hence a potential significant positive effect has been identified, although it is noted that this is of low magnitude due to the size of the site. 															
Potential significant negative and uncertain effects	No additional potential negative or uncertain effects identified.															

Table 57 Summary of potential significant effects for Site SA14: Leyton Bus Depot

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	++	++	++	0	++	0	0	++	0	0	0	0	+	?	+
Potential significant positive effects	<ul style="list-style-type: none"> SA2: This site has good access to formal and informal recreation as it is located within 400m of Abbots Park (identified as a Premier Park in the Local Plan), Knotts Green Park and Leyton Leisure Centre. The site is also within 400m of healthcare and a GP surgery. Therefore, a potential significant positive effect has been identified in relation to SA2. SA3: This site is highly accessible to community facilities and is within 400m or less of the local centre, a place of worship, informal and formal recreation facilities, and a community centre. It is also located within 1km of primary and secondary schools. Therefore, a significant positive effect has been recorded. 															

	<ul style="list-style-type: none"> SA4: This site is located off the A112 (Leyton High Road) and is easily accessible to a range of sustainable transport links i.e. 400m of a bus stop and within 800m of Leyton Midland Road Overground Station. It is also located within 400m of an employment site and should include some employment use. Therefore, a significant positive effect has been recorded. SA6: This site is located adjacent to one of the borough's Air Quality focus areas (Leyton High Road) which has been identified as having high levels of pollution and human exposure so in line with Local Plan Part 1 Policy 90 Air Pollution the development should include measures in the design to improve the existing air quality in the area. The site has good access to a train and bus station, with both located within 400m of the site. The expansion of the ULEZ includes this site which will help to reduce the reliance on private cars and associated emissions. Overall, the site supports the achievement of this objective and is therefore considered to have a potential significant positive effect. SA9: This site is located on previously developed land, a former bus depot so the development of the site could help to improve land use efficiency. The site is also not located within any LIGs, hence a potential significant positive effect has been identified, although it is noted that this is of low magnitude due to the size of the site.
Potential significant negative and uncertain effects	<ul style="list-style-type: none"> SA15: This site will deliver a mixed use development with some town centre use space which may include new employment space. The site is not located within a Borough employment area and would not result in the loss of any business floor space or industrial uses. Due to uncertainties surrounding the exact nature of space to be provided, an overall uncertain effect has been recorded.

Table 58 Summary of potential significant effects for Site SA10: Leyton Leisure Lagoon

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	++	++	++	0	++	0	0	++	• 0	0	0	0	+	+	+
Potential significant positive effects	<ul style="list-style-type: none"> SA2: This site has good access to healthcare and recreational facilities which are within 400m walking distance from the site. Therefore, a potential significant positive effect has been identified in relation to SA2. SA3: The site is highly accessible to community facilities and is within 400m or less of the local centre, a place of worship, recreation facilities and a community centre. It is also located within 1km to primary and secondary schools. Therefore, a significant positive effect has been recorded. SA4: This site is located off the A112 (Leyton High Road) and is easily accessible to a range of sustainable transport links i.e. 400m of a bus stop and within 800m of Leyton Midland Road Overground Station. It is also located within 400m of an employment site and should include some employment use. Therefore a significant positive effect has been recorded. SA6: This site is located adjacent to one of the borough's Air Quality focus areas (Leyton High Road) which has been identified as having high levels of pollution and human exposure so in line with Local Plan Part 1 Policy 90 Air Pollution the development should include measures in the design to improve the existing air quality in the area. The site has a high PTAL score so excellent access to public transport with a train and bus station located within 800m of the site. The expansion of the ULEZ will help to reduce the reliance on 															

	<p>private cars and associated emissions. Overall, the site supports the achievement of this objective and is considered to have a potential significant positive effect.</p> <ul style="list-style-type: none"> SA9: This site is located on previously developed land is not located within any LIGs, hence a potential significant positive effect has been identified, although it is noted that this is of low magnitude due to the size of the site.
Potential significant negative and uncertain effects	No additional potential negative or uncertain effects identified.

7.3.9 Wood Street

Table 59 Summary of potential significant effects for Site SA40: Crown Lea

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	+	+	-	0	+	0	+	++	0	0	0	0	+	++	+
Potential significant positive effects	<ul style="list-style-type: none"> SA9: This site is located on previously developed land, so the development of the site could help to improve land use efficiency. The site is also not located within any LIGs, hence a potential significant positive effect has been identified, although it is noted that this is of low magnitude due to the size of the site. SA15: This site will deliver a mixed use development with some new employment space, which is likely to include shared workspace. The site is also located within a Borough employment area and would not result in the loss of any business floor space or industrial uses and therefore a potential significant positive effect has been identified. 															
Potential significant negative and uncertain effects	No additional potential negative or uncertain effects identified.															

Table 60 Summary of potential significant effects for Site SA41: Wood Street Station Site

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	+	+	++	+	+	0	+	++	0	0	0	0	+	++	+
Potential significant positive effects	<ul style="list-style-type: none"> SA4: The site is within 400m of a bus stop and employment area and within 800m to Wood Street Station so it will support the achievement of this objective. However, it has PTAL score of 3-4 which is moderate to good. Development of the site is expected to facilitate step-free access to Wood Street Station, helping to increase rail access for those travelling within and through the borough. Therefore, a potential significant positive effect has been identified. 															

	<ul style="list-style-type: none"> SA9: This site is located on previously developed land, so the development of the site could help to improve land use efficiency. The site is also not located within any LIGs, hence a potential significant positive effect has been identified, although it is noted that this is of low magnitude due to the size of the site. SA15: This site will deliver a mixed-use development with some new employment space, which is likely to include shared workspace. The site is also located within a Borough employment area and would not result in the loss of any business floor space or industrial uses and therefore a potential significant positive effect has been identified.
Potential significant negative and uncertain effects	No additional potential negative or uncertain effects identified.

Table 61 Summary of potential significant effects for Site SA42: Travis Perkins

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	+	+	-	+	+	0	+	++	0	0	0	0	+	++	+
Potential significant positive effects	<ul style="list-style-type: none"> SA9: This site is located on previously developed land, so the development of the site could help to improve land use efficiency. The site is also not located within any LIGs, hence a potential significant positive effect has been identified, although it is noted that this is of low magnitude due to the size of the site. SA15: This site will deliver a mixed-use development with some new employment space, which is likely to include shared workspace. The site is also located within a Borough employment area and would not result in the loss of any business floor space or industrial uses and therefore a potential significant positive effect has been identified. 															
Potential significant negative and uncertain effects	No additional potential negative or uncertain effects identified.															

Table 62 Summary of potential significant effects for Site SA43: Brandon Road Car Park

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	+	+	-	+	+	+	0	+	++	0	0	0	0	+	0	0
Potential significant positive effects	<ul style="list-style-type: none"> SA9: This site is located on previously developed land, so the development of the site could help to improve land use efficiency. The site is also not located within any LIGs, hence a potential significant positive effect has been identified, although it is noted that this is of low magnitude due to the size of the site. 															

Potential significant negative and uncertain effects	No additional potential negative or uncertain effects identified.
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Table 63 Summary of potential significant effects for Site SA67: Barrett Road

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	?	+	+	+	+	+	0	+	++	+	0	0	0	0	++	+
<ul style="list-style-type: none"> Potential significant positive effects 	<ul style="list-style-type: none"> SA9: The site is PDL and will not have any effect on geological resources. The redevelopment of the site therefore supports the achievement of SA9 and should result in a significant positive effect. SA15: This site will deliver a mainly industrial use development, with 2,900m² of industrial floorspace. The site is located <400m within a borough employment area and not in a Strategic Industrial Location. The site therefore will contribute further to growth of the industrial economy in the area, therefore a potential significant positive effect has been identified. . 															
Potential significant negative and uncertain effects	<ul style="list-style-type: none"> SA1: The allocation would not result in the loss of any residential uses. No net-loss of industrial floorspace, with the introduction of other uses subject to the two-stage industrial masterplan process is proposed for this allocation. It is therefore not certain whether residential uses will be introduced. 															

7.3.10 Forest Road Corridor

Table 64 Summary of potential significant effects for Site SA36: Wood Street Library

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	+	++	0	+	0	0	0	++	0	0	0	?	+	+	+
Potential significant positive effects	<ul style="list-style-type: none"> SA3: This site has good access to most facilities, such as several local schools, shops, place of worship and recreation space within walking distance of the site. Although a community centre is not available within walking distance, it is expected that Local Plan Part 1 Policy 96 Infrastructure and Developer Contributions and the Social and Community Infrastructure policy (Policy 48) could ensure that infrastructure provision is considered prior to development, and provided on site where appropriate. Therefore, a potential indirect significant positive effect has been identified. SA9: This site is not located on or nearby a locally important geological resource and is entirely previously developed land. Development of the site will also help to increase density of development in the area; hence a potential significant positive effect has been identified. 															

Potential significant negative and uncertain effects	<ul style="list-style-type: none"> SA13: This site is Wood Street library, a locally listed building. It is unclear how development of this site could affect this local heritage asset, as although Local Plan Part 1 Policy 77 Locally Listed Buildings, aims to protect such assets, demolition is permitted in some cases. Therefore, an uncertain effect has been recorded.
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Table 65 Summary of potential significant effects for Site SA38: Sterling House and Willow House and Homebase, Forest Road

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	-	++	-	+	0	0	0	++	0	0	0	0	+	+	+
Potential significant positive effects	<ul style="list-style-type: none"> SA3: This site has good access to most facilities, such several local schools, shops, place of worship and recreation space within walking distance of the site. Although a formal place of worship and formal recreation facilities are not available within walking distance, it is expected that Local Plan Part 1 Policy 96 Infrastructure and Developer Contributions could ensure that infrastructure provision is considered prior to development, and provided on site where appropriate. SA9: This site is not located on or nearby a locally important geological resource and is entirely previously developed land. Development of the site will also help to increase density of development in the area; hence a potential significant positive effect has been identified. 															
Potential significant negative and uncertain effects	No additional potential negative or uncertain effects identified.															

Table 66 Summary of potential significant effects for Site SA37: Fellowship Square (Town Hall Campus)

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	++	++	-	+	0	0	0	++	0	0	0	0	0	?	+
Potential significant positive effects	<ul style="list-style-type: none"> SA2: This site has access to space for formal recreation facilities, such as gym and Chestnuts Field within 400m walking distance of the site. A GP practice is also within 800m of the site, which should help to ensure residents are able to maintain a healthy lifestyle and good wellbeing. Therefore, an overall indirect significant positive effect has been recorded. SA3: This site has good access to most facilities, such several local schools, shops, place of worship and recreation space within walking distance of the site. Although a community centre is not available within walking distance, it is expected that Local Plan Part 1 Policy 96 Infrastructure and Developer Contributions could ensure that infrastructure provision is considered prior to development, and provided on site where appropriate. Therefore, a potential indirect significant positive effect has been identified. SA9: This site is not located on or nearby a locally important geological resource and is entirely previously developed land. Development of the site will also help to increase density of development in the area, hence a potential significant positive effect has been identified. 															

Potential significant negative and uncertain effects	<ul style="list-style-type: none"> SA15: The development of this site will not result in the loss of strategic industrial land, and lies within walking distance of an employment area. This site should also deliver a mixed use development, although it is currently unclear if this will include a net increase in employment / business space. Therefore, an uncertain effect has been recorded.
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Table 67 Summary of potential significant effects for Site SA39: Hylands Road Phase 1 & 2

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	--	-	-	0	0	0	0	++	0	0	-	0	0	+	+
Potential significant positive effects	<ul style="list-style-type: none"> SA9: This site is not located on or nearby a locally important geological resource and is entirely previously developed land. Development of the site will also help to increase density of development in the area, hence a potential significant positive effect has been identified. 															
Potential significant negative and uncertain effects	<ul style="list-style-type: none"> SA2: This site is located on the periphery of the borough, with informal open space available within 400m walking distance of the site. However, there are no GP practices or formal recreation facilities within 800m walking distance of the site. This could prevent future residents from maintaining a healthy lifestyle and good wellbeing. Therefore, a potential significant negative effect has been recorded for this SA objective. SA3: This site is <400m from informal recreation space and <800m from Wood Street District Centre and shopping frontage. It is also within walking distance of primary and secondary schools, such as Waltham Forest College. However, the site currently lacks access to some facilities, such as a community centre, place of worship and formal recreation facilities. This could inhibit future residents from meeting all their cultural, recreational and social needs and could prevent community cohesion. Therefore, a potential significant negative effect has been identified. SA4: This site is located within walking distance of a bus stop, however, there is poor access to the rail network and employment areas. The site PTAL score of 2 would suggest that public transport services are currently limited. Development of the site is therefore unlikely to aid in integrating public transport or reducing car journey lengths. However, Local Plan Part 1 Policy 69: Public Transport does require development to support and enhance public transport connectivity, which could help to maximise accessibility of the site. It is unclear if this can be achieved at the site, therefore an uncertain effect has been recorded. 															

7.3.11 Walthamstow Town Centre

Table 68 Summary of potential significant effects for Site SA31: Stow Car Wash & Valeting and Walthamstow Trades Hall

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	++	++	0	++	0	0	0	++	0	0	0	0	+	++	+
Potential significant positive effects	<ul style="list-style-type: none"> SA2: This site is <800m walking distance from a GP practice and Lloyd park, an area which contains both formal and informal recreation facilities. These facilities should aid in helping future residents to maintain a healthy and active lifestyle, as well as good wellbeing. Therefore, a potential indirect significant positive effect has been recorded. SA3: This site has good access to a variety of facilities, including Walthamstow Town Centre, Greenleaf Primary School, a secondary school, places of worship, Waltham Forest Assembly Hall and Lloyd park within walking distance from the site. This should enable future residents of the site to access the educational, cultural, and social services they require as a result of development for the site. Therefore, a potential indirect significant positive effect has been recorded for this SA objective. SA5: This site is located within the district heat network, and there is an electric charging point within 600m of the site. This should help to ensure the development of the site works towards low carbon growth; therefore, a potential significant positive effect has been identified. SA9: This site is not located on or nearby a locally important geological resource, and is entirely previously developed land. Development of the site will also help to increase density of development in the area; hence a potential significant positive effect has been identified. SA15: This site will deliver a mixed-use development with 1,000m2 of new employment space, which is likely to include shared workspace. The site is also located <800m from a borough employment area and would not result in the loss of any business floor space or industrial uses and therefore a potential significant positive effect has been identified. 															
Potential significant negative and uncertain effects	No additional potential negative or uncertain effects identified.															

Table 74 Summary of potential significant effects for Site SA25: Walthamstow Central Bus Station

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	+	+	++	0	++	0	0	++	0	0	0	0	++	+	+
Potential significant positive effects	<ul style="list-style-type: none"> SA4: This site has access to East London Office Centre employment area, a bus stop and Walthamstow Central tube and train station within 400m walking distance. A PTAL score of 6 across the entire site also suggests that there are frequent services from these transport links. These good public transport links should help to ensure that future residents of the site are able to access services and employment they require, without the need for a private car. Therefore, a potential significant positive effect has been identified. 															

	<ul style="list-style-type: none"> SA6: This site has good public transport links, and will be included within the expansion of the ULEZ in 2021. Development of this site could therefore aid in reducing private car use and reducing associated emissions, thus indirectly aiding to improve air quality. Therefore, a potential significant positive effect has been identified. SA9: This site is not located on or nearby a locally important geological resource, and is entirely previously developed land. Development of the site will also help to increase density of development in the area; hence a potential significant positive effect has been identified. SA14: This site is located within Walthamstow Town Centre and will provide 205 new dwellings, hence development of this site is likely to help in increasing the vitality and viability of the area. Therefore, a potential significant positive effect has been recorded.
Potential significant negative and uncertain effects	No additional potential negative or uncertain effects identified.

Table 69 Summary of potential significant effects for Site SA28: High Street Sainsburys

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	+	+	++	0	++	0	0	++	0	0	0	0	++	++	++
Potential significant positive effects	<ul style="list-style-type: none"> SA4: This site has access to East London Office Centre employment area, a bus stop and Walthamstow Queens Road tube station within walking distance. A PTAL score of 5 across the entire site also suggests that there are frequent services from these transport links. These good public transport links should help to ensure that future residents of the site are able to access services and employment they require, without the need for a private car. Therefore, a potential significant positive effect has been identified. SA6: This site has good public transport links, and will be included within the expansion of the ULEZ in 2021. Development of this site could therefore aid in reducing private car use and reducing associated emissions, thus indirectly aiding to improve air quality. Therefore, a potential significant positive effect has been identified. SA9: This site is not located on or nearby a locally important geological resource, and is entirely previously developed land. Development of the site will also help to increase density of development in the area; hence a potential significant positive effect has been identified. SA14: This site is located within Walthamstow Town Centre and will provide 300 new dwellings and 4,000m² of new employment space, hence development of this site is likely to help in increasing the vitality and viability of the area. Therefore, a potential significant positive effect has been recorded. SA15: This site will deliver a mixed-use development with 4,000m² of new employment space, which is likely to include shared workspace. The site is also located <800m from a borough employment area and would not result in the loss of any business floor space or industrial uses and therefore a potential significant positive effect has been identified. 															

	<ul style="list-style-type: none"> SA16: A potential significant positive effect has been identified, as this site will provide 4,000m² of new employment space, alongside residential development. There are also good public transport links to the site, evidenced by a PTAL score of 6 for the site. Therefore, an overall significant positive score has been recorded.
Potential significant negative and uncertain effects	No additional potential negative or uncertain effects identified.

Table 70 Summary of potential significant effects for Site SA30: Osborne Grove

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	+	+	+	++	0	++	0	0	++	0	0	0	0	++	+	+
Potential significant positive effects	<ul style="list-style-type: none"> SA4: This site has access to a bus stop and Walthamstow Queens Road tube station within walking distance. A PTAL score of 5 across the entire site also suggests that there are frequent services from these transport links. The development of this site will also include shops as well as business space. These good public transport links should help to ensure that future residents of the site are able to access services and employment they require, without the need for a private car. Therefore, a potential significant positive effect has been identified. SA6: This site has good public transport links, and will be included within the expansion of the ULEZ in 2021. Development of this site could therefore aid in reducing private car use and reducing associated emissions, thus indirectly aiding to improve air quality. Therefore, a potential significant positive effect has been identified. SA9: This site is not located on or nearby a locally important geological resource, and is entirely previously developed land. Development of the site will also help to increase density of development in the area, hence a potential significant positive effect has been identified. SA14: This site is located within Walthamstow Town Centre and will provide 30 new dwellings and a range of new retail and employment space, hence development of this site is likely to help in increasing the vitality and viability of the area. Therefore, a potential significant positive effect has been recorded. 															
Potential significant negative and uncertain effects	No additional potential negative or uncertain effects identified.															

Table 71 Summary of potential significant effects for Site SA29: Wilkos, Walthamstow High Street

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	+	+	++	0	++	0	0	++	0	0	0	0	++	+	+
Potential significant positive effects	<ul style="list-style-type: none"> SA4: This site has access to a bus stop and Walthamstow Queens Road tube station within walking distance. A PTAL score of 5 across the entire site also suggests that there are frequent services from these transport links. These good public transport links should help to ensure that future residents of the site are able to access services and employment they require via public transport, without the need for a private car. Therefore, a potential significant positive effect has been identified. SA6: This site has good public transport links, and will be included within the expansion of the ULEZ in 2021. Development of this site could therefore aid in reducing private car use and reducing associated emissions, thus indirectly aiding to improve air quality. Therefore, a potential significant positive effect has been identified. SA9: This site is not located on or nearby a locally important geological resource, and is entirely previously developed land. Development of the site will also help to increase density of development in the area; hence a potential significant positive effect has been identified. SA14: This site is located within Walthamstow Town Centre and will provide 98 new dwellings, hence development of this site is likely to help in increasing the vitality and viability of the area. Therefore, a potential significant positive effect has been recorded. 															
Potential significant negative and uncertain effects	No additional potential negative or uncertain effects identified.															

Table 72 Summary of potential significant effects for Site SA27: St James Quarter

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	++	++	++	++	++	0	0	++	0	0	0	0	++	+	+
Potential significant positive effects	<ul style="list-style-type: none"> SA2: This site is <800m walking distance from a GP practice, St James park, allotments, and several gyms. These facilities should aid in helping future residents to maintain a healthy and active lifestyle, as well as good wellbeing. Therefore, a potential indirect significant positive effect has been recorded. SA3: This site has good access to a variety of facilities, including Walthamstow Town Centre, Primary and secondary schools, places of worship, The Mill Community Centre and St James park within walking distance from the site. This should enable future residents of the site to access the educational, cultural, and social services they require as a result of development for the site. Therefore, a potential indirect significant positive effect has been recorded for this SA objective. SA4: This site has access to a bus stop and St James Street tube station within walking distance, although a PTAL score of 4 for some areas of the site suggests that services from these transport links are not comprehensive. The site is also located away from designated 															

	<p>employment areas, although it is assumed that the development would provide some new flexible employment space. Public transport links could help to ensure that future residents of the site are able to access services and employment they require via public transport, without the need for a private car. Therefore, a potential significant positive effect has been identified.</p> <ul style="list-style-type: none"> SA5: This site is located within the heat network, and there is an electric charging point within 600m of the site. This should help to ensure the development of the site works towards low carbon growth; therefore, a potential significant positive effect has been identified. SA6: This site has good public transport links, and will be included within the expansion of the ULEZ in 2021. Development of this site could therefore aid in reducing private car use and reducing associated emissions, thus indirectly aiding to improve air quality. Therefore, a potential significant positive effect has been identified. SA9: This site is not located on or nearby a locally important geological resource, and is entirely previously developed land. Development of the site will also help to increase density of development in the area; hence a potential significant positive effect has been identified. SA14: This site is located within Walthamstow Town Centre and will provide 300 new dwellings, hence development of this site is likely to help in increasing the vitality and viability of the area. Therefore, a potential significant positive effect has been recorded.
Potential significant negative and uncertain effects	No additional potential negative or uncertain effects identified.

Table 73 Summary of potential significant effects for Site SA26: The Mall

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	+	+	++	+	+	0	0	++	0	0	0	0	++	++	++
Potential significant positive effects	<ul style="list-style-type: none"> SA4: The site has access to East London Office Centre employment area, a bus stop and Walthamstow Queens Road tube station within walking distance. A PTAL score of 6 across the entire site also suggests that there are frequent services from these transport links. These good public transport links should help to ensure that future residents of the site are able to access services and employment they require, without the need for a private car. Development of this site is also expected to provide new station access, further aiding to increase public transport access for users of this site, as well as others in the borough. Therefore, a potential significant positive effect has been identified. SA9: This site is not located on or nearby a locally important geological resource, and is entirely previously developed land. Development of the site will also help to increase density of development in the area; hence a potential significant positive effect has been identified. SA14: The site is located within Walthamstow Town Centre and will provide around 540 new dwellings and new employment space, hence development of this site is likely to help in increasing the vitality and viability of the area. Therefore, a potential significant positive effect has been recorded. 															

	<ul style="list-style-type: none"> SA15: This site will deliver a mixed use development with new employment space, which is likely to include shared workspace. The site is also located <800m from a borough employment area and would not result in the loss of any business floor space or industrial uses and therefore a potential significant positive effect has been identified. SA16: A potential significant positive effect has been identified, as this site will provide new employment space, alongside residential development. There are also good public transport links to the site, evidenced by a PTAL score of 6 for the site. Therefore, an overall significant positive score has been recorded.
Potential significant negative and uncertain effects	No additional potential negative or uncertain effects identified.

7.3.12 Highams Park

Table 74 Summary of potential significant effects for Site SA59: 472-510 Larkshall Road and James Yard

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	+	+	-	0	-	0	0	+	0	0	0	0	++	+	+
Potential significant positive effects	SA14: Site 59 is located within Highams Park District Centre, hence development of the site could help to enhance the vitality of the area by improving site appearance, as well as residential and employment space available. Therefore, a potential significant positive effect has been identified.															
Potential significant negative and uncertain effects	No additional potential negative or uncertain effects identified.															

Table 75 Summary of potential significant effects for Site SA60: Shell Garage, Higham Park

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	+	-	+	-	0	-	0	0	+	0	0	0	0	++	+	+
Potential significant positive effects	SA14: Site SA60 is located within Highams Park District Centre, hence development of the site could help to enhance the vitality of the area by improving site appearance, as well as residential and employment space available. Therefore, a potential significant positive effect has been identified, although it is noted that this is of low magnitude due to the size of the site.															
Potential significant	No additional potential negative or uncertain effects identified.															

negative and uncertain effects	
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Table 76 Summary of potential significant effects for Site SA68: Highams Park Industrial Estate

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	?	-	-	-	0	-	0	0	+	0	0	0	0	0	++	+
Potential significant positive effects	<ul style="list-style-type: none"> SA15: All sites are expected to provide some employment space and there will be no net loss of current employment space from this site. The site is not located on any strategic industrial land, and is located within the Highams Park Industrial estate employment area. Therefore, a potential significant positive effect has been identified, as dense, mixed use development will be achieved whilst intensifying industrial floorspace. 															
Potential significant negative and uncertain effects	<ul style="list-style-type: none"> SA1: A minimum of no net-loss of industrial floorspace, with the introduction of other uses subject to the two-stage industrial masterplan process is proposed for this allocation. It is therefore not certain whether residential uses will be introduced. 															

7.3.13 North Circular

Table 77 Summary of potential significant effects for Site SA46: Sainsbury's Car Park and Adjacent Sites

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	++	?	?	0	0	0	0	++	0	0	0	0	0	--	?
Potential significant positive effects	<ul style="list-style-type: none"> SA2: This site has good access to informal recreation and is also within 800m walking distance of formal recreation facilities. It is more than 800m from the nearest healthcare facilities (GP). As a development which is over 100 new dwellings a health impact assessment will be required as part of the development proposals in accordance with Local Plan Part 1 Policy 50 Promoting Healthy Communities. New community facilities could be provided through the Local Plan Part 1 Policy 96 'Infrastructure and Developer Contributions' which states that the Local Planning Authority will support development proposals that provide adequate contributions towards physical, social and community, green and transport infrastructure to meet the needs associated with the development. Due to the reasonably good access that this site has to recreation facilities, and the potential for new facilities to be provided as part of this large development, a potential significant positive effect is recorded. SA9: This site was previously a plastic works and therefore survey will be required to ascertain whether any remedial works are required to redevelop the site for residential use. Local Plan Part 1 Policy 95: Contaminated Land requires developments to address issues arising from contaminated land. The site is PDL and will not have any effect on geological resources. The redevelopment of the site therefore supports the achievement of SA9 and should result in a significant positive effect. 															

<p>Potential significant negative and uncertain effects</p>	<ul style="list-style-type: none"> • SA3: The site has good access to informal recreation space and a place of worship. It also has good access to a secondary school with capacity. Walthamstow Primary Academy is approx. 15 min walk from the site and has capacity. However, a community centre, shopping frontage and town centre are more than 800m from the site. Local Plan Part 1 Policy 96 'Infrastructure and Developer Contributions' states that the Local Planning Authority will support development proposals that provide adequate contributions towards physical, social and community, green and transport infrastructure to meet the needs associated with the development. Therefore, new community facilities could potentially be provided as part of the development of this large site. As access to some facilities is currently lacking an uncertain effect is identified because the provision of new facilities would be needed to achieve a positive effect and that is reliant on implementation of Local Plan Part 1 Policy 96 Infrastructure and Developer Contributions as well as Local Plan Part 1 Policy 47 Social and Community Infrastructure. • SA4: This site is located near to a borough employment area which may provide access to employment for some residents, plus some employment space will be provided as part of the development. However, the site has a poor PTAL score, is more than 800m to the nearest bus stop and the nearest train station is >800m away. The site is not far from the proposed cycle route which would connect it to Chingford Station in the north and Walthamstow Central to the south. It is difficult to see how residents of the development will be able to access local facilities/services and employment without investment in improved public transport and walking and cycling access. Therefore an uncertain effect is identified. • SA15: This site will deliver a mixed use development with some residential and retail uses. It is assumed that the car dealership currently on site will not be reprovided and that there will be a net reduction in the number of jobs supported by the site when considering the loss of the dealership and the reduction in size of the Sainsburys supermarket. The site does not have a good PTAL score. It is unlikely the redevelopment of this site will improve the local economy by enabling employment developments in an appropriate place and therefore a potential significant negative effect is identified. • SA16: This site will deliver a mixed use development with some new retail space, which is likely to include a smaller Sainsburys supermarket. Although the site is within 800m of the nearest Borough employment area it has a poor PTAL score currently which may mean that accessing employment opportunities further afield for residents may be limited. It is assumed that the car dealership currently on site will not be reprovided and that there will be a net reduction in the number of jobs supported by the site when considering the loss of the dealership and the reduction in size of the Sainsburys supermarket. It is uncertain whether the redevelopment of this site will maintain stable levels of employment in the borough.
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Table 78 Summary of potential significant effects for Site SA48: Morrisons Supermarket and Car Park

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	+	+	?	0	0	0	0	++	0	0	0	0	+	?	+
Potential significant positive effects	<ul style="list-style-type: none"> SA9: This site is PDL and will not have any effect on geological resources. The redevelopment of the site therefore supports the achievement of SA9 and should result in a significant positive effect. 															
Potential significant negative and uncertain effects	<ul style="list-style-type: none"> SA4: This site has good access to bus stops but the nearest train/underground station is >800m away and the area has a poor PTAL score of 2. However, the site is not far from the proposed cycle route which would connect it to Chingford Station in the north and Walthamstow Central to the south. Without improved PTAL scores through investment in public transport it is uncertain whether this site will have good access to a sustainable transport system, therefore an uncertain effect is identified. SA15: This site will deliver a mixed-use development with some new employment space, which is likely to include shared workspace plus a smaller Morison's supermarket. However, this site is not well located with regards to public transport and therefore an uncertain effect is identified. 															

Table 79 Summary of potential significant effects for Site SA47: Cork Tree Retail Park

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	0	0	0	0	0	0	0	0	++	0	0	0	0	0	+	+
Potential significant positive effects	<ul style="list-style-type: none"> SA9: This site is PDL and will not have any effect on geological resources. The redevelopment of the site therefore supports the achievement of SA9 and should result in a significant positive effect. 															
Potential significant negative and uncertain effects	No additional significant negative or uncertain effects identified.															

Table 80 Summary of potential significant effects for Site SA63: North Circular Road SIL 2

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	?	+	?	?	0	0	0	0	++	0	0	--	0	0	++	++
Potential significant positive effects	<ul style="list-style-type: none"> SA9: The site is PDL and will not have any effect on geological resources. The redevelopment of the site therefore supports the achievement of SA9 and should result in a significant positive effect. SA15: This site would lead to the intensification of industrial floorspace in an area designated as SIL, leading to 90,000m2 of industrial floorspace on this site. A potential significant positive effect has been recorded. 															

	<ul style="list-style-type: none"> SA16: The redevelopment of this site will intensify industrial floorspace in an area designated as SIL, helping to support existing and create opportunities for new jobs within the industrial sector. Therefore, a potential significant positive effect has been identified.
Potential significant negative and uncertain effects	<ul style="list-style-type: none"> SA1: It is currently unclear if this site will provide any residential development, as industrial uses will be developed, with other uses subject to a two stage masterplan process, hence an uncertain effect has been recorded. SA3: The site has good access to primary and secondary schools within approx. 20-25 min walk. The nearest primary school (Walthamstow Primary Academy) has capacity however, the nearest secondary school (Walthamstow Academy) is currently operating over capacity. Retail and recreation facilities are within reasonable walking distance (<800m) although there is some difficulty in crossing the A406 North Circular road in this area. There is no place of worship, community centre town or local centre within 800m of the site. Due to the lack of access to some community facilities and the barrier presented by the A406 North Circular road which limits access to the Chingford Mount area, it is uncertain whether the redevelopment of this site would help to improve community cohesion and inequalities. However, it is possible that new residents may be able to access facilities within the new Meridian Water regeneration area in Enfield but it is located over 1km away and would currently take 30 mins to walk to. Construction of Meridian Water will take place over the next 25 years. An uncertain effect is identified overall. SA4: The site has good access to a bus stop but is over 800m to a train station. The site is a 30 min walk from the Meridian Water rail station in Enfield borough. PTAL scores are poor at this site. Residents of a redevelopment at this site could potentially access jobs within the Meridian Water regeneration area within Enfield borough which is currently a 30 min walk away and will be delivered over the next 25 years. It is difficult to see how residents or workers of the development will be able to access local facilities/services and employment without investment in improved public transport and walking and cycling access. Therefore an uncertain effect is identified. SA12: This site lies partially within Green Belt land and therefore a significant negative effect is identified.

Table 81 Summary of potential significant effects for Site SA74: Deacon Trading Estate (Cabinet Way)

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	?	+	0	-	0	?	0	0	++	0	0	0	0	0	++	-
Potential significant positive effects	<ul style="list-style-type: none"> SA9: The site is PDL and will not have any effect on geological resources. The development of the site therefore supports the achievement of SA9 and should result in a significant positive effect. SA15: This site will improve the local economy, providing opportunities for employment within the borough. The site is also located within a borough employment area and site requirements detail the need to reprovide 7,800m² of current floorspace, with the opportunity for uplift of provision. Therefore a potential significant positive effect has been identified. 															
Potential significant negative and	<ul style="list-style-type: none"> SA1: The allocation would not result in the loss of any residential uses. This site currently contains the condition of a minimum of no net-loss of industrial floorspace, with the introduction of other uses subject to the two-stage industrial masterplan process is proposed for this allocation. It is therefore not certain whether residential uses will be introduced. 															

uncertain effects	<ul style="list-style-type: none"> SA6: The site has good access to a bus stop but is over 800m from train station. The site is an approx. 35 min walk from the Meridian Water rail station in Enfield borough. PTAL scores are poor at this site. The development will be just outside the expanded ULEZ therefore it is unlikely that this site will contribute to improvements in air pollution in this area. The site is also on the North Circular road which is an air quality Focus Area which is a location that has been identified as having high levels of pollution and human exposure. Therefore, in line with Local Plan Part 1 Policy 90 'Air Pollution' the development will need to demonstrate on-site measures to improve air quality and be accompanied by investment in public transport and walking and cycling in order to provide sustainable access to site for future employees. It is also unclear if this site will be able to achieve the air quality positive status mandated in criterion C of policy 90, hence an overall uncertain effect has been recorded.
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Table 82 Summary of potential significant effects for Site SA64: Justin Road / Trinity Way

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	?	+	+	?	0	0	0	0	++	0	0	0	0	0	++	++
<ul style="list-style-type: none"> Potential significant positive effects 	<ul style="list-style-type: none"> SA9: The site is PDL and will not have any effect on geological resources. The redevelopment of the site therefore supports the achievement of SA9 and should result in a significant positive effect. SA15: This site would lead to the intensification of industrial floorspace in an area designated as SIL, leading to 21,700m² of industrial floorspace on this site. A potential significant positive effect has been recorded. SA16: The redevelopment of this site will intensify industrial floorspace in an area designated as SIL, helping to support existing and create opportunities for new jobs within the industrial sector. Therefore, a potential significant positive effect has been identified. 															
<ul style="list-style-type: none"> Potential significant negative and uncertain effects 	<ul style="list-style-type: none"> SA1: It is currently unclear if this site will provide any residential development, as industrial uses will be developed, with other uses subject to a two stage masterplan process, hence an uncertain effect has been recorded. SA4: The site is located on a borough employment area and is located near to two other employment areas (also being considered as allocation site options). It has good access to a bus stop but a low PTAL score suggesting services are limited. It is more than 800m from a train station. The site is not far from the proposed cycle route which would connect it to Chingford Station in the north and Walthamstow Central to the south. Pedestrian access could be improved by the introduction of access points to adjacent roads. It is difficult to see how residents of the development will be able to access local facilities/services and employment without investment in improved public transport and walking and cycling access. Therefore an uncertain effect is identified. 															

7.3.14 Chingford Mount

Table 83 Summary of potential significant effects for Site SA50: Former South Chingford Library Site

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	+	?	-	0	-	0	0	+	0	0	0	0	0	0	0
Potential significant positive effects	No additional significant positive effects.															
Potential significant negative and uncertain effects	SA3: The site has good access to a current formal recreation area, good access to primary schools, and reasonable access to secondary schools. However, there is no place of worship, community centre, shop frontage, or town or local centre located within 800m of the site, which could inhibit the ability of residents to access the facilities they require. However, as the site is large enough to constitute local centre of sorts in its own right, the eventual outcome will depend to some extent on the nature of the development itself. Therefore, an overall uncertain effect has been recorded.															

Table 84 Summary of potential significant effects for Site SA49: Sainsburys, Hall Lane

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	+	+	+	0	+	0	0	+	0	0	0	0	+	+	0
Potential significant positive effects	No additional significant positive effects identified.															
Potential significant negative and uncertain effects	No additional significant negative or uncertain effects identified.															

Table 85 Summary of potential significant effects for Site SA51: Albert Corner

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	+	+	+	0	+	0	0	+	0	0	0	0	+	+	+
Potential significant positive effects	No additional significant positive effects identified.															
Potential significant negative and uncertain effects	No additional significant negative or uncertain effects identified.															

7.3.15 Sewardstone Road

Table 86 Summary of potential significant effects for Site SA54: 60-74 Sewardstone Road

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	+	+	-	0	0	0	0	++	0	0	0	0	+	+	+
Potential significant positive effects	SA9: This site is located on previously developed land and is not located within any LIGs, hence a potential significant positive effect has been identified (it is noted that this is of low magnitude due to the size of the site).															
Potential significant negative and uncertain effects	No additional significant negative or uncertain effects identified.															

Table 87 Summary of potential significant effects for Site SA52: Motorpoint, Sewardstone Road

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	+	?	-	0	0	0	0	++	0	0	0	0	+	+	+
Potential significant positive effects	SA9: This site is located on previously developed land and is not located within any LIGs, hence a potential significant positive effect has been identified.															
Potential significant negative and uncertain effects	<ul style="list-style-type: none"> SA3: The site has mixed accessibility to community facilities. It is within 400m of a local centre and shopping frontage, more than 800m of a community centre, place of worship and recreational facilities, 3.2km of a primary school, and 4.8km of a secondary school. It is noted, however, that the local primary school is over-subscribed & the secondary is at 94% capacity. In accordance with Local Plan Policy 100 'Infrastructure and Developer Contributions', the development would need to contribute adequate contributions towards physical, social and community, green and transport infrastructure to meet the needs associated with the development and this would could education and community centre facilities. An uncertain effect is identified as it is not certain how this would be implemented and whether it would contribute to community cohesion (i.e. school spaces may not be provided in the immediate vicinity). 															

Table 88 Summary of potential significant effects for Site SA53: Lee Valley Motor Company

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	+	0	-	0	0	-	0	++	0	0	0	0	+	+	+
Potential significant positive effects	SA9: This site is located on previously developed land and is not located within any LIGs, hence a potential significant positive effect has been identified (it is noted that this is of low magnitude due to the size of the site).															
Potential significant negative and uncertain effects	No additional significant negative or uncertain effects identified.															

7.3.16 North Chingford

Table 89 Summary of potential significant effects for Site SA58: Royal Epping Forest Golf Club

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	-	-	+	0	+	0	0	++	0	0	0	0	+	+	+
Potential significant positive effects	SA9: This site is located on previously developed land, and development could help to improve land use efficiency. The site is also not located within any LIGs, hence a potential significant positive effect has been identified, although it is noted that this is of low magnitude due to the size of the site.															
Potential significant negative and uncertain effects	No additional significant negative or uncertain effects identified.															

Table 90 Summary of potential significant effects for Site SA56: Chingford Library and Assembly Hall

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	+	++	+	0	+	0	0	++	0	0	0	0	+	++	+
Potential significant positive effects	<ul style="list-style-type: none"> SA3: This site also currently has good access to the local centre, primary and secondary schools, as well as a place of worship and community centre (which will continue to be provided on the site itself). Therefore, an overall significant positive effect has been recorded. SA9: This site is located on previously developed land, which is currently used as a library and assembly hall. Hence, development of the site could help to improve land use efficiency. The site is also not located within any LIGs, hence a potential significant positive effect has been identified, although it is noted that this is of low magnitude due to the size of the site. SA15: This site will deliver FSA43 a mixed-use development with some new employment space, which is likely to include shared workspace. The site is not within a SIL but is within 800m of a borough employment area. The development would not result in the loss of any business floor space or industrial uses and therefore a significant positive effect has been identified. 															
Potential significant negative and uncertain effects	No additional significant negative or uncertain effects identified.															

Table 91 Summary of potential significant effects for Site SA55: UKPN, Budgens and Gresham Works North Chingford

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	+	+	++	+	0	+	0	0	++	0	0	0	0	++	++	+
Potential significant positive effects	<ul style="list-style-type: none"> SA3: This site has good access to the local centre, primary and secondary schools, as well as a place of worship and community centre (which will continue to be located on a nearby site). Therefore, an overall significant positive effect has been recorded. SA9: This site is located on previously developed land, and development could help to improve land use efficiency. The site is also not located within any LIGs, hence a potential significant positive effect has been identified, although it is noted that this is of low magnitude due to the size of the site. SA14: This site is within 400m (walking distance) of a district centre (North Chingford), and is therefore expected to enhance the vitality of the district centre. Development of the site should replace retail facilities and improve the public realm, which should contribute positively towards SA14. SA15: This site will deliver a mixed use development with some new employment space, which is likely to include shared workspace. The site is not within a SIL but is within 800m of a borough employment area. Therefore a significant positive effect has been identified. 															
Potential significant negative and uncertain effects	No additional significant negative or uncertain effects identified.															

Table 92 Summary of potential significant effects for Site SA57: North City Autos, Chingford

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	-	++	+	0	+	0	0	++	0	0	0	0	+	++	+
Potential significant positive effects	<ul style="list-style-type: none"> SA3: The site is not within 800m of an existing community centre but is otherwise well-connected for community cohesion, with good access to the local centre, primary and secondary schools, recreation land, and a place of worship. Therefore, an overall significant positive effect has been recorded. SA9: This site is located on previously developed land, and development could help to improve land use efficiency. The site is also not located within any LIGs, hence a potential significant positive effect has been identified, although it is noted that this is of low magnitude due to the size of the site. SA15: This site will deliver a mixed-use development with some new employment space, which is likely to include shared workspace. The site is not within a SIL but is within 800m of a borough employment area. Therefore a significant positive effect has been identified. 															
Potential significant negative and uncertain effects	No additional significant negative or uncertain effects identified.															

7.3.17 Sites Outside of Strategic Locations

Table 93 Summary of potential significant effects for Site SA24: Norlington Road Sites

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	+	0	-	0	+	0	0	++	0	0	0	0	0	++	+
Potential significant positive effects	<ul style="list-style-type: none"> SA9: This site is located on previously developed land, so the development of the site could help to improve land use efficiency. The site is also not located within any LIGs, hence a potential significant positive effect has been identified, although it is noted that this is of low magnitude due to the size of the site. SA15: The site is not located within a Strategic Industrial Location, but it is within 400m of a Borough Employment Area. The development of this site will also provide 12,850m² of industrial floorspace, hence a potential significant positive effect has been identified. 															
Potential significant negative and uncertain effects	No additional potential negative or uncertain effects identified.															

Table 94 Summary of potential significant effects for Site SA65: Hainault Road

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	?	?	-	-	+	0	0	0	++	0	0	0	0	0	++	+
Potential significant positive effects	<ul style="list-style-type: none"> SA9: This site is located on previously developed land which could help to improve land use efficiency. The site is also not located within any LIGs, hence a potential significant positive effect has been identified, although it is noted that this is of low magnitude due to the size of the site. SA15: This is mainly an industrial site with new employment spaces and shared workspaces. The site is also located within a borough employment area and is not in a Strategic Industrial Location. Plans state no net-loss of industrial floor space. There is potential for other mixed uses subject to the two-stage industrial masterplan process, which could further employment offer within the borough. 															
Potential significant negative and uncertain effects	<ul style="list-style-type: none"> SA1: A minimum of no net-loss of industrial floorspace, with the introduction of other uses subject to the two-stage industrial masterplan process is proposed for this allocation. It is therefore not certain whether residential uses will be introduced. SA2: The site lies more than 800m from a GP/health care centre, informal and formal recreation. As an industrial site this could have adversely affect the health and wellbeing of those who work on the site. If residential uses are introduced on the site, new residents would have limited access to recreation and GP services. An uncertain effect is therefore identified, as the final details of site development are not yet known. 															

Table 95 Summary of potential significant effects for Site SA44: Priory Court

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	++	++	?	-	?	0	0	++	0	0	0	0	0	?	?
Potential significant positive effects	<ul style="list-style-type: none"> SA2: This site is within 800m walking distance of Penrhyn Surgery and Lloyd Park. There is also allotment space adjacent to the site and Priory Court Playgrounds <300m from the site. These services and facilities should help residents of the site to maintain a healthy and active lifestyle, with good wellbeing. Hence a potential significant positive effect has been recorded. SA3: This site is within 1km of The Winns Primary School and Walthamstow Academy. Forest Road Neighbourhood Centre is also <800m walk from this site, as is a place of worship. Access to informal and formal open space is also good, with Lloyd Park and Priory Court playgrounds nearby. Therefore, a potential indirect significant positive effect has been recorded, as it is expected that residents will be able to meet cultural, educational and social facilities from this site. SA9: This site is not located on a local geological resource, and is partially previously developed land. Development of the site will also help to increase density of development in the area, hence a potential significant positive effect has been identified, although it is noted that this is of low magnitude due to the size of the site. 															
Potential significant negative and uncertain effects	<ul style="list-style-type: none"> SA4: This site lacks access to the public transport network, with no bus stop or trains station within walking distance of the site. This is further evidenced by a PTAL score of 1b. There are also no employment areas within walking distance of the site. The location of this site is therefore likely to prevent future residents from travelling within and to the site via sustainable modes, and could encourage an increase in car use. Local Plan Part 1 Policy 64 Public Transport could help to mitigate potential negative effects by ensuring development 															

	<p>at this site is accompanied by improvements to local transport infrastructure. However, it is unclear if this will be mandatory or achievable, hence an overall uncertain effect has been recorded.</p> <ul style="list-style-type: none"> SA6: This site currently has poor access to public transport, with no bus stop or train station within walking distance of the site. This could lead to an increase in private car use by those accessing the site and local emissions could increase, thus local air quality could worsen. It is unclear if Local Plan Part 1 Policy 64 Public Transport, could help to improve public transport connections, hence an overall uncertain effect has been recorded. SA15: This site is located within 800m of Forest Road Neighbourhood Centre and is not located on strategic industrial land. However, the site is not within walking distance of an employment area. Although this site should also deliver a mixed use development, it is currently unclear if this will include new employment or business space. Therefore, an uncertain effect has been recorded. SA16: An uncertain effect has been identified, as it is currently unclear what type, if any, employment space will be provided at this site and therefore whether it will support local employment.
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Table 96 Summary of potential significant effects for Site SA61: Larkwood Leisure Centre, Nursery and Land to the rear of Larkwood Leisure Centre

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	++	?	?	0	0	0	0	++	+	0	0	0	0	0	0
Potential significant positive effects	<ul style="list-style-type: none"> SA2: This site is not within 800m of a healthcare facility; while access to formal and informal recreation is good, with the former within 400m of the site and the latter within 800m. SA9: Much of this site is located on previously developed land; hence its development will improve land use efficiency. The site is also not located within any LIGs, hence a potential significant positive effect has been identified, which will be of higher magnitude owing to the size of the site. 															
Potential significant negative and uncertain effects	<ul style="list-style-type: none"> SA3: The site has good access to a current formal recreation area, and reasonable access to primary and secondary schools. However, there is no place of worship, community centre, or town or local centre located within 800m of the site, which could inhibit the ability of residents to access the facilities they require (although the site is large enough to constitute local centre of sorts in its own right). Policy 96 could aid in ensuring infrastructure for facilities and services is provided, although it is uncertain if this would be on site. Therefore, an overall uncertain effect has been recorded. SA4: Access to public transport is reasonable, with a bus stop within 400m and a railway station within 800m. In addition, there is an employment centre within 800m, and development of the site could include some employment space. However, a PTAL score of two for the site would suggest that services are infrequent from these transport connections, which could affect the ability of future residents to use sustainable transport modes for all journeys. Overall, an uncertain effect has been identified, as although it is noted that an increase in service frequency could modify the predicted effect to a positive one it is not clear if this is feasible or realistic. 															

Table 97 Summary of potential significant effects for Site SA62: Pear Tree House

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	-	-	+	0	+	0	0	++	0	0	0	0	+	0	0
Potential significant positive effects	SA9: This site is located on previously developed land, and development could help to improve land use efficiency. The site is also not located within any LIGs, hence a potential significant positive effect has been identified, although it is noted that this is of low magnitude due to the size of the site.															
Potential significant negative and uncertain effects	No additional significant negative or uncertain effects identified.															

Table 98 Summary of potential significant effects for Site SA45: 234_240 Billet Road

SA objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
Score	++	+	++	?	0	0	0	0	++	0	0	0	0	0	0	0
Potential significant positive effects	<ul style="list-style-type: none"> SA3: Although not located within 800m of a district centre or a place of worship, this site is otherwise well located, with a community centre within 800m, primary and secondary schools within 1km, and shops and formal and informal recreation facilities within 400m. The redevelopment of the site should therefore place new residents in an area with reasonably good provision of community facilities which should support community cohesion. SA9: This site is PDL and will not have any effect on geological resources. The redevelopment of the site therefore supports the achievement of SA9 and should result in a significant positive effect. 															
Potential significant negative and uncertain effects	<ul style="list-style-type: none"> SA4: This site is not particularly accessible. Although within 400m of a bus stop (the low PTAL score suggests infrequent services) and within 800m of an employment area, there is no train or tube station nearby. It is difficult to see how residents of the development will be able to access local facilities/services and employment without investment in improved public transport and walking and cycling access. Therefore an uncertain effect is identified. 															

8 Potential Cumulative Effects of the Proposed Allocation Sites

8.1 Introduction

This section describes potential cumulative effects which may arise as a result of the Regulation 19 Site Allocations Document. These are presented as:

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

8.2 Potential Cumulative Effects Identified

This section considers the potential cumulative effects which may result from the allocation of sites together within the Site Allocations Document. Below are some cumulative effects which it is predicted all allocation sites could contribute to.

Potential cumulative effects most sites could contribute to:

1. A significant positive cumulative effect has been identified for SA1 (Meet local housing needs through the provision of a range of tenures and sizes of new dwellings) objective, resulting from all of the allocation sites which have been identified as having potential to provide new housing. The combined deliver of sites could contribute to an overall significant positive effect with regards to meeting local housing needs and providing an improved range of tenures and sizes of new dwellings.
2. There is an opportunity for a positive cumulative effect from developments in the borough if they provide employment space for specific sectors to enable them to grow and support each other in clusters or hubs. However, as most allocation sites do not included requirements to support specific sectors, an uncertain potential cumulative effect has been identified for most sites in respect of SA15 (Improve the local economy by enabling employment developments in appropriate places).
3. There is potential for a positive cumulative effect on maintaining stable levels of employment across the borough from all development sites if they will provide mixed use development. However, employment levels are also determined by the macro economic climate and at the time of writing this creates uncertainty with regards to employment in the borough during the short / medium term. An uncertain potential cumulative effect has therefore been identified in relation to SA16 (Maintain stable levels of employment in the Borough).

Other potential cumulative effects have been identified resulting from the development of one or more sites together:

Lea Bridge & Church Lane Strategic Location

SA3 (Improve community cohesion and reduce inequalities through the provision of community facilities to meet local, cultural, educational, recreational and social needs): The development of sites SA05, SA06, SA07, SA71, SA72, and SA73 in combination could increase pressure on local primary schools. The nearest primary for all these sites is Sybourn Primary School, which is already at 99% capacity. Development of these sites, would create at least an additional 1,067 dwellings to the area, could therefore exacerbate existing capacity issues. These sites are also all lacking access to a community centre. However, the precise details of development are currently unknown for sites SA71, SA72 and SA73, with potential for further residential development alongside the proposed industrial use developments. Therefore, there is potential for a cumulative negative effect, but an overall uncertain cumulative effect has been recorded due to the unknown nature of residential development and educational provision in the area.

Stewardstone Road Strategic Location

SA4 (Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system, reducing car use for all journey lengths): Potential cumulative negative effect on traffic from development sites SA52, SA53 and SA54 which could all increase the use of private car use due to limited public transport in the Sewardstone Road area and high dependence on cars in the north of the borough.

North Chingford Strategic Location

SA2 (Improve standard of health and wellbeing of those who live and work in the Borough): There is potential for a significant negative cumulative effect to occur in relation to pressure on healthcare facilities with other sites in the North Chingford cluster (SA57, SA58 and SA62).

SA3 (Improve community cohesion and reduce inequalities through the provision of community facilities to meet local, cultural, educational, recreational and social needs): There is potential for a significant negative cumulative effect to occur from development of sites SA62 and SA58, as they are not well-located for access to community centres and places of worship. A coordinated approach to addressing lack of access may be needed.

SA14 (Maintain and enhance the vitality and viability of the Borough's town centres): Considered collectively, owing to the number and location of the individual sites, the site allocations in the North Chingford strategic location could result in a minor positive cumulative effect on vitality and viability of Chingford district centre.

Wood Street Strategic Location

SA5 (Reduce greenhouse gas emissions and promote low carbon growth): There is potential for a significant positive cumulative effect if sites SA41, SA42, SA43 and SA67 are developed in this area as it would improve the viability of existing and/or proposed district heat networks. Therefore, a significant positive cumulative effect could result in relation to the reduction of greenhouse gas emissions and achieving low carbon growth in the borough.

SA14 (Maintain and enhance the vitality and viability of the Borough's town centres): Potential for a significant positive cumulative effect across all sites in this area (sites SA40-43) as they will provide mixed use development which should contribute to enhancing the vitality and viability of Wood Street district centre.



Bakers Arms and Layton Green Strategic Location

SA14 (Maintain and enhance the vitality and viability of the Borough's town centres): Potential for a significant positive cumulative effect across all sites within this cluster as they will provide mixed use development which should contribute to enhancing the vitality and viability of Bakers Arms district centre.

Blackhorse Lane Strategic Location

SA4: an uncertain cumulative effect is recorded in relation to development at sites SA34 and SA35 because there is currently uncertainty that the required investment in sustainable transport would be delivered in order for a positive effect to be achieved.

SA5 (Reduce greenhouse gas emissions and promote low carbon growth): If a number of development sites within this location, including sites SA32, SA33, SA34, SA35 and SA69 are all developed, it would improve the viability of district heat networks and a significant positive cumulative effect could result in relation to the reduction of greenhouse gas emissions and achieving low carbon growth in the borough.

North Circular Strategic Location

SA3 (Improve community cohesion and reduce inequalities through the provision of community facilities to meet local, cultural, educational, recreational and social needs): There is a potential for a significant negative effect on community cohesion and equalities should sites, SA47, SA63 and SA74 all be developed, which all have limited access to community facilities.

SA4 (Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system, reducing car use for all journey lengths): Potential significant negative cumulative effect with other potential allocation sites in the North Circular area which are lacking public transport access (Sites SA46, SA47, SA48, SA63, SA64 and SA74).

Leytonstone Town Centre Strategic Location

SA6 (Improve air quality): The development of sites SA17, SA18 and SA20 in the Leytonstone Town Centre area is likely to aid in improving air quality, as these sites all have good access to public transport and will be included in the ULEZ expansion in 2021. This should reduce car use and associated emissions, thus indirectly helping to improve air quality. Therefore, a potential indirect significant positive cumulative effect has been identified.

SA14 (Maintain and enhance the vitality and viability of the Borough's town centres): The development of sites SA17, SA18, SA19, SA20 and SA21 in the Leytonstone District Centre area could aid in enhancing the vitality and viability of this town centre area, bringing around 1,710 new dwellings and 26,000m² of new business space to the area. Therefore, a potential significant positive cumulative effect has been identified.

Walthamstow Town Centre Strategic Location

SA4 (Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system, reducing car use for all journey lengths): The development of sites SA25, SA26, SA27, SA28, SA29 and SA30 and in the Walthamstow Town centre area should help to create 920 new homes which are well connected to the public transport network. The development of all these sites in combination could help to increase



sustainable travel use in the area, decreasing car use. Therefore, a potential significant positive cumulative effect has been identified.

SA6 (Improve air quality): The development of sites SA25, SA26, SA27, SA28, SA29 and SA30 and in the Walthamstow Town Centre area are likely to support improving air quality, as these sites all have good access to public transport and will be included in the ULEZ expansion in 2021. This should reduce car use and associated emissions, thus indirectly helping to improve air quality. Therefore, a potential significant positive cumulative effect has been identified.

SA14 (Maintain and enhance the vitality and viability of the Borough's town centres): The development of sites SA25, SA26, SA27, SA28, SA29 and SA30 in the Walthamstow Town Centre area is likely to enhance the vitality of this town centre, by creating new retail space, 4,000m² business space and 920 new homes. This works towards the objective SA14, thus a potential cumulative significant positive effect has been identified.

Highams Park Strategic Location

SA2 (Improve standard of health and wellbeing of those who live and work in the Borough): sites SA59, SA60 and SA68 in the Highams Park area have poor access to healthcare and recreation facilities and their development could lead to an increase in the number of residents in this area unable to access the facilities required to maintain or improve their standard of health and wellbeing. The cumulative effect of developing several sites in clusters also has the potential to increase pressure on existing healthcare services, due an increase in demand. Therefore, a potential minor negative cumulative effect has been identified.

SA4 (Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system, reducing car use for all journey lengths): There is potential for a significant negative cumulative effect to occur, resulting from the development of Sites SA59, SA60 and SA68 in combination, as all have poor access to public transport, evidenced by low PTAL scores. This could increase the number of journeys made by private car and decrease the sustainable travel.

SA14 (Maintain and enhance the vitality and viability of the Borough's town centres): There is potential for a positive cumulative effect to result from the development of sites SA59, SA60 and SA68 as these are all within or adjacent to the Highams Park district centre. The development of both sites in combination is likely to improve the vitality of the area, hence a potential positive cumulative effect has been identified.

8.3 Potential Cumulative Effects with Other Plans and Projects

This section details the potential effects which could arise from the implementation of the Local Plan spatial strategy working in combination with growth planned in neighbouring areas (Table 99) and with projects coming forward within the Borough (Table 104).

Table 99: Potential Cumulative Effects with Other Plans

Local Authority	Proposed Growth	Potential cumulative effects with Waltham Forest Local Plan
London Borough of Enfield	<p>A new Local Plan is being prepared and reviewed in response to consultation comments received between December 2018 and February 2019. It is predicted that Enfield's population could exceed 400,000 by 2032.</p> <p>The extant Core Strategy⁷³ plans for growth concentrated in town centres and on previously developed land in the south and east of the Borough. Up to 2026 the plan aims to deliver approximately 11,000 new homes and the number of jobs will increase by a minimum of 6,000. Large scale growth and regeneration will be focused in four broad locations - Central Leaside and North East Enfield in the Upper Lee Valley, the area around the North Circular Road at New Southgate and the Borough's major town centre - Enfield Town.</p> <p>The strategic objectives for Enfield are to strengthen retail, public services and employment, protecting biodiversity, reducing the borough's carbon footprint, enhancing quality of life and living environments and reducing the need to travel, all of which are likely to result in sustainability positive effects.</p>	<p>The current spatial strategy in Enfield concentrates growth in areas which border Waltham Forest. Ponders End, Meridian Water and Edmonton are all in the east of the Borough of Enfield and could potentially combine with potential effects of growth to the east of LB Waltham Forest such as the North Circular Corridor, Sewardstone Road and North Chingford strategic locations.</p> <p>Traffic levels are high within Waltham Forest and the entire borough is an AQMA. The A110 and A406 (North Circular) in Waltham Forest also pass through Enfield borough. Traffic generated in Enfield may contribute to traffic in Waltham Forest and population growth, despite investment in public transport and aims to create sustainable communities, could potentially exacerbate this. An Air Quality Mitigation Strategy is being prepared by London Borough of Waltham Forest which details the measures being put in place to reduce traffic levels and air pollution within Waltham Forest over the LP1 plan period. This includes the policies within the LP1 which seek to build on the success of the 'Enjoy Waltham Forest' project⁷⁴, establish 15-minute neighbourhoods to enable residents to meet their daily needs close to home without the use of private cars and improve walking and cycling and public transport provision. Forecasts by the Department for</p>

⁷³ The Enfield Plan Core Strategy 2010-2025 Adopted November 2010

⁷⁴ <https://enjoywalthamforest.co.uk/>

Local Authority	Proposed Growth	Potential cumulative effects with Waltham Forest Local Plan
		<p>Transport⁷⁵ identify that traffic within London Boroughs is going to consists of a much higher number of EV within the medium-term. The forecasts predict that there will be a 500% increase in EV within Waltham Forest by 2025. With the strong transport policies in the LP1 in place along with Government forecasts, no residual cumulative effect is identified.</p> <p>The part of the Lee Valley SPA/Ramsar site which is located within LB Waltham Borough is called the 'Walthamstow Wetlands'. Walthamstow Wetlands was opened to the public in 2017 and is London's largest urban wetland nature reserve. Public access to the Wetlands is managed. With growth in both Enfield and within the west of Waltham Forest Borough, there is potential for a cumulative negative effect on the Lee Valley SPA/Ramsar site. However, mitigation has been put in place within the LP1 policies and is set out within the HRA Report (April 2021) to address potential effects from the Waltham Forest LP1 on Lee Valley SPA/Ramsar site. No residual cumulative effect identified.</p>
Haringey	Haringey's development plan is currently made up of the Strategic Policies, Development Management Policies, Site Allocations and Tottenham Area Action Plan, alongside the London Plan. Strategic Policies were adopted by the council in 2013, to replace the Unitary Development Plan (UDP), with subsequent alterations adopted on the 24 July 2017 ⁷⁶ . The plan aims to deliver a minimum 19,800 net new homes over the plan period to 2026. The Council's overall strategy for managing future growth in Haringey is to promote the provision of homes, jobs and other facilities in the areas with significant redevelopment opportunities at, or near, transportation hubs,	<p>With growth in both Haringey and Waltham Forest there is potential for a significant cumulative negative effect on the Lee Valley SPA/Ramsar site with regards to recreational pressure and water supply. Potential investments and policies to improve walking and cycling in both Haringey and Waltham Forest could help to limit any increase in air pollution which could result from population growth predicted. In addition, an Air Quality Mitigation Strategy is being prepared by London Borough of Waltham Forest which details the measures being put in place to reduce traffic levels and air pollution within Waltham Forest over the LP1 plan period. This includes the policies within the LP1 which seek to build on the success of the 'Enjoy Waltham Forest'</p>

⁷⁵ Electric Vehicle Charging Point Strategy London Borough of Waltham Forest 2020 – 2025 available here: <https://www.walthamforest.gov.uk/content/electric-vehicle-charging-points>

⁷⁶ Haringey's Local Plan 2013 – 2026 (formerly the Core Strategy) March 2013 consolidated with alterations since 2017

Local Authority	Proposed Growth	Potential cumulative effects with Waltham Forest Local Plan
	<p>and support appropriate development at other accessible locations, with more limited change elsewhere.</p> <p>The Tottenham Hale Area of Growth is located to the east of the borough, close to the Lee Valley Regional Park and the boundary with Waltham Forest.</p>	<p>project⁷⁷, establish 15-minute neighbourhoods to enable residents to meet their daily needs close to home without the use of private cars and improve walking and cycling and public transport provision. Forecasts by the Department for Transport⁷⁸ identify that traffic within London Boroughs is going to consist of a much higher number of EV within the medium-term. The forecasts predict that there will be a 500% increase in EV within Waltham Forest by 2025. With the strong transport policies in the LP1 in place along with Government forecasts, no residual cumulative effect is identified.</p>
London Borough of Hackney	<p>On 22 July 2020, the Hackney Local Plan 2033 was adopted. The Local Plan includes an objective to deliver up to 26,250 additional homes and 23,000 new jobs. Mixed use development with residential, employment, retail, leisure and community facilities will be focused in the designated town centres of Dalston and Hackney Central, and in Shoreditch (none of which are close to the boundary with Waltham Forest). New office development will be directed to the most sustainable locations in the Borough, including within the City Fringe Opportunity Area and the borough's Town Centres to support Hackney's economy. Mixed use, housing led development will be encouraged along the borough's key corridors (including Lea Valley Edge which borders Waltham Forest). This development is intended to deliver improvements to the public realm, new community facilities and other measures that promote healthy streets that easily link different neighbourhoods, open spaces public transport hubs, and civic areas by walking and cycling.</p>	<p>The A104 and A12 pass between the boroughs of Waltham Forest and Hackney. Despite planned investments and policies promoting sustainable development in both boroughs it is possible that traffic could increase with the growth proposed in both boroughs. An Air Quality Mitigation Strategy is being prepared by London Borough of Waltham Forest which details the measures being put in place to reduce traffic levels and air pollution within Waltham Forest over the LP1 plan period. This includes the policies within the LP1 which seek to build on the success of the 'Enjoy Waltham Forest' project⁷⁹, establish 15-minute neighbourhoods to enable residents to meet their daily needs close to home without the use of private cars and improve walking and cycling and public transport provision. Forecasts by the Department for Transport⁸⁰ identify that traffic within London Boroughs is going to consist of a much higher number of EV within the medium-term. The forecasts predict that there will be a 500% increase in EV within Waltham Forest by 2025. With the strong transport policies in the LP1 in place along with Government forecasts, no residual cumulative effect is identified.</p>

⁷⁷ <https://enjoywalthamforest.co.uk/>

⁷⁸ Electric Vehicle Charging Point Strategy London Borough of Waltham Forest 2020 – 2025 available here: <https://www.walthamforest.gov.uk/content/electric-vehicle-charging-points>

⁷⁹ <https://enjoywalthamforest.co.uk/>

⁸⁰ Electric Vehicle Charging Point Strategy London Borough of Waltham Forest 2020 – 2025 available here: <https://www.walthamforest.gov.uk/content/electric-vehicle-charging-points>

Local Authority	Proposed Growth	Potential cumulative effects with Waltham Forest Local Plan
		With growth in both Hackney and Waltham Forest there is potential for a significant cumulative negative effect on the Lee Valley SPA/Ramsar site in relation to recreation pressure and water supply. This has been investigated within the HRA Report (April 2021) and no potential negative effects have been identified.
London Borough of Newham	<p>The Newham Local Plan was adopted in December 2018 to replace the previous Core Strategy and Detailed Sites and policies Development Plan Document. The new plan covers a 15 year period to 2033⁸¹. The Local Plan aims to deliver a minimum of 43,00 new homes by 2033, as well as up to 60,000 new jobs.</p> <p>Development of high density, mixed use and sustainable in terms of location and design are encouraged throughout Newham, but particularly in the following strategic locations:</p> <ul style="list-style-type: none"> (a) Stratford and West Ham (b) Royal Docks (c) Canning Town and Custom House (d) Beckton (e) Urban Newham 	No potential cumulative effects have been identified. The Forest Gate growth area in LB Newham is promoted as a town centre for regeneration by the Newham Local Plan. A total of 7856 new dwellings are required to be developed within urban Newham by 2033, which could lead to increased traffic and demands on public transport. However, the LB Waltham Forest spatial strategy includes strong policies for the strategic locations to the south of Waltham Forest which should help to strengthen these locations (Leyton and South Leytonstone) and discourage residents from travelling south to Forest Gate to access services, facilities and employment.
London Borough of Redbridge	<p>The Redbridge Local Plan was adopted in March 2018. It aims to deliver up to 17,237 new homes across the borough⁸². The Local Plan directs new development including new homes, shops, businesses, leisure facilities and infrastructure to:</p> <ul style="list-style-type: none"> (a) The borough's Investment and Growth Areas of: i Ilford; ii Crossrail Corridor; iii Gants Hill; iv South Woodford; and v Barkingside. (b) The borough's main town centres. (c) Other identified Opportunity Sites. 	<p>The South Woodford Growth Area is located within the west of Redbridge borough, close to the boundary with Waltham Forest. So too is the town centre of Wanstead where growth will also be directed.</p> <p>Traffic levels are high within Waltham Forest and the entire borough is an AQMA. The A12 and North Circular roads pass through Redbridge and Waltham Forest boroughs. Traffic generated in Redbridge may contribute to traffic in Waltham Forest and population growth could</p>

⁸¹ Newham Local Plan, 2018-2033, adopted December 2018

⁸² Redbridge Local Plan 2015 - 2030

Local Authority	Proposed Growth	Potential cumulative effects with Waltham Forest Local Plan
	<p>The objectives of the Local Plan include increasing energy efficiency, encouraging sustainable patterns of transport, improving access to employment, supporting the strategic industrial Locations in the borough, and protecting conditions for biodiversity.</p>	<p>potentially exacerbate this, despite investment in public transport and policies within the Waltham Forest Local Plan to improve air quality.</p> <p>An Air Quality Mitigation Strategy is being prepared by London Borough of Waltham Forest which details the measures being put in place to reduce traffic levels and air pollution within Waltham Forest over the LP1 plan period. This includes the policies within the LP1 which seek to build on the success of the 'Enjoy Waltham Forest' project⁸³, establish 15-minute neighbourhoods to enable residents to meet their daily needs close to home without the use of private cars and improve walking and cycling and public transport provision. Forecasts by the Department for Transport⁸⁴ identify that traffic within London Boroughs is going to consist of a much higher number of EV within the medium-term. The forecasts predict that there will be a 500% increase in EV within Waltham Forest by 2025. With the strong transport policies in the LP1 in place along with Government forecasts, no residual cumulative effect is identified.</p> <p>Growth within Redbridge borough could contribute to recreational pressure on the Epping Forest SAC, a part of which is located on the boundary between the two boroughs. This could potentially combine with increased recreational pressure from growth in Waltham Forest. Mitigation in the form of policy wording within LP1 has been put in place in order to avoid this potential effect and a 'toolbox approach' (including Suitable Alternative Natural Greenspace (SANG) provision and contributions to an Epping Forest Strategic Access Monitoring and Management Strategy (SAMMS)) will be implemented in Waltham Forest Borough and other areas within 6.2km of the Epping Forest SAC boundary, in order to mitigate for recreational and urbanisation effects on Epping Forest. An SPD is being prepared by the London</p>

⁸³ <https://enjoywalthamforest.co.uk/>

⁸⁴ Electric Vehicle Charging Point Strategy London Borough of Waltham Forest 2020 – 2025 available here: <https://www.walthamforest.gov.uk/content/electric-vehicle-charging-points>

Local Authority	Proposed Growth	Potential cumulative effects with Waltham Forest Local Plan
		Borough of Waltham Forest Council to provide a detailed mechanism for the mitigation of the potential effects on Epping Forest SAC by developers. With this mitigation in place, no residual cumulative is effect identified.
Epping Forest District	<p>The adopted Local Plan is dated 2006. An updated Local Plan has been prepared for the period 2011-2033 (Submission version dated December 2017) which made provision for a minimum of 11,400 new homes through:</p> <ul style="list-style-type: none"> • The creation of Garden Town Communities around Harlow; • Development of previously developed land and some open space land within existing settlements; • Development of previously developed land within the Green Belt; Greenfield/Green Belt land on the edge of settlements; • Development of some grades of agricultural land; and • Development of some smaller sites in rural communities. <p>Most development is to be directed to Harlow (circa 3,900 new homes), followed by Epping (1305), Loughton (1021), Waltham Abbey (858) and North Weald Basset (1050).</p> <p>Following examination, the Inspectors report (dated 2nd August 2019) concluded that the Local Plan is not currently sound and requires further major modifications before it can be accepted. Issues include air quality and recreation/urbanisation effects on Epping Forest SAC identified within the plan HRA which require further investigation and mitigation.</p>	<p>The draft spatial strategy in Epping Forest District directs the majority of development to settlements which are not on the boundary with Waltham Forest. Nevertheless, some development is directed to Loughton and Waltham Abbey in the south of Epping Forest District, and smaller scale development may also occur in smaller settlements in that area.</p> <p>Mitigation in the form of policy wording within LP1 has been put in place in order to avoid this potential effect and a 'toolbox approach' (including SANG provision and contributions to an Epping Forest SAMMS) will be implemented in Waltham Forest Borough and other areas within 6.2km of the Epping Forest SAC boundary, in order to mitigate for recreational and urbanisation effects on Epping Forest. An SPD is being prepared by the London Borough of Waltham Forest Council to provide a detailed mechanism for the mitigation of the potential effects on Epping Forest SAC by developers. With this mitigation in place, no residual cumulative is effect identified.</p> <p>An Air Quality Mitigation Strategy is being prepared by London Borough of Waltham Forest which details the measures being put in place to reduce traffic levels and air pollution within Waltham Forest over the LP1 plan period. This includes the policies within the LP1 which seek to build on the success of the 'Enjoy Waltham Forest' project⁸⁵, establish 15-minute neighbourhoods to enable residents to meet their daily needs close to home without the use of private cars and improve walking and cycling and public transport provision.</p>

⁸⁵ <https://enjoywalthamforest.co.uk/>

Local Authority	Proposed Growth	Potential cumulative effects with Waltham Forest Local Plan
		<p>Forecasts by the Department for Transport⁸⁶ identify that traffic within London Boroughs is going to consists of a much higher number of EV within the medium-term. The forecasts predict that there will be a 500% increase in EV within Waltham Forest by 2025. With the strong transport policies in the LP1 in place along with Government forecasts, no residual cumulative effect is identified.</p>
<p>The London Plan, 2019 (intend to publish version)</p>	<p>The London Plan recognises the deprivation within Waltham Forest, and clearly sets out strategy to deal with this. For example, the London Legacy Development Corporation (LLDC), which involves several local authorities having a coordinated response to issues in the area surrounding the Queen Elizabeth Olympic Park.</p>	<p>There is potential for a cumulative positive effect to result from the implementation of the Waltham Forest Local Plan working in combination with the London Plan in relation to SA1 (housing), SA3 (health), SA19 (local economy) and SA20 (employment). Both plans recognise the need to channel investment into Waltham Forest, in order to regenerate areas of the Borough which currently do not adequately serve local people.</p>

⁸⁶ Electric Vehicle Charging Point Strategy London Borough of Waltham Forest 2020 – 2025 available here: <https://www.walthamforest.gov.uk/content/electric-vehicle-charging-points>

Table 104: Potential Cumulative Effects with Other Projects

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

Project	Description	Potential cumulative effects with Waltham Forest Local Plan
	combustion, to produce low carbon energy in the form of heat and steam.	<p>significant positive cumulative effects in relation to the following SA objectives:</p> <ul style="list-style-type: none"> - Climate change resilience (SA7) may be improved through the reduction in carbon emissions related to waste management; - Air quality improvement (SA9) is a key objective of this project, which is likely to improve the nearby air quality in nearby Boroughs such as Waltham Forest; - 2,500 jobs created through the construction of the plant could help to employ those living within Waltham Forest (SA20). - 325 local apprenticeships and skills training opportunities could provide local education for young people (SA20). - The environment surrounding Edmonton may be improved by this project, thus the air quality in the Lee Valley Regional Park could be improved (SA9).

9 Mitigation and Enhancement Measures

This section details mitigation measures identified to offset uncertain and significant negative effects of the proposed site allocations. Mitigation measures are common to some sites and they have therefore been grouped together in Table 105.

Enhancement measures have also been put forward in the assessments of the proposal site allocations where opportunities exist to improve the performance of sites where potential minor positive or neutral effects have been identified. Enhancement measures are provided within Appendix C.

Mitigation and enhancement measures have also been put forward for the alternative sites but as they are not being proposed as allocations, the mitigation and enhancement measures for those sites are not included in this section. They can be found in Appendix C.

In addition to the measures put forward in Table 105, column K of the assessment worksheets in Appendix C identifies any Local Plan Part 1 policies (Regulation 19 Proposed Submission version) which provide mitigation for potential effects arising from the development of site allocations. The Local Plan Part 1 policies which provide mitigation are:

- Policy 5: Management of Growth;
- Policy 13: Delivering Genuinely Affordable Housing;
- Policy 15: Housing Size and Mix;
- Policy 26: Safeguarding and Managing Strategic Industrial Locations (SIL);
- Policy 48 Social and Community Infrastructure;
- Policy 50: Promoting Healthy Communities;
- Policy 51: Health Impact Assessment;
- Policy 63: Active Travel;
- Policy 64: Public Transport;
- Policy 68: Managing Vehicle Traffic;
- Policy 69: Electric Vehicles (EV);
- Policy 72: Designated Heritage Assets;
- Policy 73: Listed Buildings;
- Policy 74: Conservation Areas;
- Policy 75: Archaeological Assets and Archaeological Priority Zones;
- Policy 76: Non-Designated Heritage Assets;
- Policy 77: Locally Listed Buildings;
- Policy 80: Parks Open Spaces and Recreation;
- Policy 81: Biodiversity and Geodiversity;
- Policy 83: The Epping Forest and the Epping Forest Special Area of Conservation;
- Policy 84: The Lee Valley Regional Park;
- Policy 85: Protecting and Enhancing Waterways and River Corridors;
- Policy 86: Food Growing and Allotments;
- Policy 87: A Zero Carbon Borough;
- Policy 88: Decentralised and Renewable Energy;
- Policy 89: Sustainable Design and Construction;
- Policy 90: Air Pollution;
- Policy 91: Water Quality and Water Resources;

- Policy 92: Contaminated Land Policy;
- Policy 93: Managing Flood Risk; and
- Policy 96: Infrastructure and Developer Contributions.

The mitigation provided by the Local Plan policies is taken into account in the effects of the site allocations (and rejected sites) which are reported in Sections 6, 7 and 8 of this report.

Table 100: Mitigation measures for the proposed site allocations

Mitigation Measures	Sites Measure Applies to
SA1: Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	
Further development details are required for the site, in order to determine the potential effects on SA1.	SA63, SA64, SA65, SA66, SA67, SA71, SA72, SA73
SA2: Improve standard of health and wellbeing of those who live and work in the Borough	
Site allocation policy text should require the need for additional healthcare facilities to be assessed and any shortfall contributed to as a part of the development. The assessment should take account of in combination needs of allocation sites / developments nearby and facilities should be provided in a co-ordinated manner as far as possible.	SA57, SA58, SA59, SA60, SA62, SA68, SA75
This site has poor access to recreation. The provision of recreation facilities (formal and informal) in this area should be assessed and provided as a part of the development if a need is identified.	SA06
New formal recreation space, a community centre and a healthcare facility are needed within walking distance. This could also help to increase access to such services for existing residents of the surrounding area and improve community cohesion.	SA39
For this site to be redeveloped with some residential uses, access to GP/healthcare facilities and recreation should be improved through the provision of new facilities.	SA65
Further details of site development and the two stage masterplan process could help to mitigate the potential uncertain effect identified. The inclusion of recreation and healthcare space on site could modify the uncertain effect to a significant positive.	SA69
SA3: Improve community cohesion and reduce inequalities through the provision of community facilities to meet local cultural, educational, recreational and social needs	
Site allocation policy text could include a requirement to contribute to community and educational facilities required to meet needs of new development locally, in a coordinated manner with other development within the area. The policies for these site allocations should require contributions to a primary school and a community centre provision, in order to meet future needs created by development at the sites together.	SA05, SA06, SA07, SA52, SA62, SA58, SA61, SA71, SA72, SA73
Site allocation policy text could include a requirement to contribute to new community facilities such as a community centre, local shops and place of worship required to meet needs of new residents locally, in a coordinated manner with other development within the area.	SA16, SA50

Mitigation Measures	Sites Measure Applies to
A community centre, shopping frontage and town centre are more than 800m from the site. The need for new community facilities in order to ensure community cohesion and equality of access for new residents should be assessed and any new facilities required should be provided as part of the development.	SA16, SA46
Site allocation policy text should include a requirement to ensure that the need for community facilities and local retail are assessed and contributed to as appropriate in accordance with the Local Plan policies on Developer Contributions and Infrastructure and Social and Community Infrastructure.	SA02, SA03, SA09
Clarification is needed as to the re-provision of facilities planned for this site. If some existing facilities will not be re-provided through development, then future residents may not be able to access the services and facilities they require and re-provision would be required in this neighbourhood if there is a demonstrated need.	SA08
New formal recreation space, a community centre and a healthcare facility are needed within walking distance. This could also help to increase access to such services for existing residents of the surrounding area and improve community cohesion.	SA39
A coordinated approach to the provision of community facilities and assessment of access to facilities will be needed for new developments in this part of the borough, with consideration of facilities being provided in the borough of Enfield at the Meridian Water regeneration area.	SA47, SA63, SA74
For this site to be redeveloped with some residential uses, access to community facilities should be improved through the provision of new facilities.	SA65
SA4: Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system, reducing car use for all journey lengths	
Site allocation policy text should require public transport improvements as well as good walking and cycling infrastructure to be provided with the development in order to deliver a sustainable development of the site in accordance with LP policies relating to public transport and active travel.	SA05, SA46, SA48, SA35, SA45, SA03, SA73
Public transport services and walking and cycling access to this site should be improved in order to maintain the site's use for retail centre.	SA47
Site allocation policy text should require assessment of cumulative effects from nearby developments on sustainable transport and, if identified as necessary following assessment, further investment in local transport infrastructure in this area, in order to ensure all future residents are able to travel via sustainable modes in and around the borough.	SA52, SA53, SA54, SA59, SA60, SA68, SA75
Investment in public transport and walking and cycling access to this site would be required in accordance with Local Plan Part 1 Policy 64 Public Transport in order to improve sustainable access as part of the development.	SA03, SA04, SA16, SA39, SA44, SA50, SA61
In order for the site to be redeveloped for mixed uses it would need to be delivered with investment in public transport and walking and cycling infrastructure in order to achieve a sustainable development and tackle poor air quality within the borough. Improved accessibility across roads in this area, including the North Circular, should be investigated in order to improve access. These requirements should be included within an allocation policy for this site.	SA46, SA47, SA48, SA63, SA64, SA74

Mitigation Measures	Sites Measure Applies to
Support car club development, cycle hires facilities and other sustainable transport initiatives, such as electric vehicle, charging infrastructure and pocket parks on site could encourage more sustainable travel to work where train network links are poor.	SA65, SA69
The development should prevent private car use by those accessing the site through investing in local infrastructure, enabling employees wider access to sustainable transport. E.g. on-site EV charging points and secure bike sheds, as well as improved bus and rail links to the site.	
SA6: Improve air quality	
Investment in public transport and walking and cycling access to this site would be required in accordance with Local Plan Part 1 Policy 64 Public Transport in order to improve sustainable access as part of the development.	SA44, SA61
Site allocation policy text should require public transport improvements as well as good walking and cycling infrastructure to be provided with the development in order to deliver a sustainable development of the site in accordance with LP policies relating to public transport and active travel.	SA52
SA12: Maintain and enhance the quality of green belt and open space areas	
It is recommended that site considerations specifically address the need to conserve the current setting and quality of the green belt designation.	SA69
SA13: Conserve and enhance the historic environment	
This site is Wood Street library, a locally listed building. It is unclear how development of this site could affect this local heritage asset, as although the Local Plan Part 1 policy on Locally Listed Buildings aims to protect such assets, demolition is permitted in some cases. Therefore, an uncertain effect has been recorded. Further details of the development proposed at this site are required, in order to determine if there is potential for a significant negative effect to occur.	SA36
SA15: Improve the local economy by enabling employment developments in appropriate places	
With reference to the Employment Land Study (August 2019) it is recommended that the site allocation policy text is refined to ensure that the employment space provision on this allocation site and others nearby support specific sectors.	All proposed site allocations
The type of employment to be provided on the site and the anticipated jobs yield could be stipulated within site allocation policy text.	SA46
Further details of the non-residential floorspace proposed for this site could be stipulated within site allocation policy text.	SA20, SA37, SA44
Further details of development on site will need to be obtained in order to determine the precise nature of potential effects.	SA03, SA12, SA14, SA18, SA60
A development condition of this site could be included within site allocation policy text to retain the existing SIL at the southern end of this site.	SA05

Mitigation Measures	Sites Measure Applies to
SA16: Maintain stable levels of employment in the Borough	
The type of employment to be provided on the site and the anticipated jobs yield could be stipulated within site allocation policy text.	SA20, SA46
Further detail of the proposed development at this site would aid in mitigating the uncertain effect recorded with regards to maintaining employment levels in the Borough.	SA18, SA20, SA44, SA60
There is nothing more that the plan can do to address the uncertainty related to the macro economic climate i.e. providing flexible workspaces in mixed use developments which should support the high levels of self-employed residents in the borough and also support homeworking which may become more prevalent over the long term.	All proposed site allocations

10 Proposed Monitoring Arrangements

The SEA Regulations require monitoring of the significant environmental effects of implementing the Waltham Forest Local Plan parts 1 and 2. Monitoring should cover the significant economic and social effects, as well as the environmental ones.

The requirements of the SEA Regulations focus on monitoring the significant negative and unforeseen effects of the plan. Therefore, monitoring will focus on the residual effects which are significantly negative or uncertain, as presented within sections 7 and 8.

The Local Plan includes a Monitoring Strategy which will be reported on through the Authority Monitoring Report (AMR). The outcome of the monitoring process will inform whether or not the Local Plan should be reviewed. At this stage, two primary areas of risk have been identified:

- Insufficient sites coming forward for housing and/or employment development due to difficulties in land assembly and development viability, the consequence of which being that housing and employment delivery fall behind the projected trajectory and the Borough fails or is likely to fail to meet its Objectively Assessed Needs for housing and employment.
- Infrastructure delivery, either in the form of on-site delivery or financial contributions to support off-site, is insufficient to deliver the provision of critical infrastructure, without which, development cannot proceed.

Appendix 5 of the LP1 'Monitoring Indicators and Targets' sets out the performance indicators and targets by which the progress of the plan will be monitored. All of the LP1 indicators set out within Appendix 5 of the LP1 will provide information in relation to the sustainability effects of the plan including housing, employment development and jobs delivery and maintaining greenbelt. Via planning conditions, the London Borough of Waltham Forest will also be ensuring that development proposals demonstrate biodiversity net gain using the Natural England Biodiversity metric (or agreed equivalent), and for developments of 10 units and above, developers will be encouraged to exceed the Urban Greening Factor targets scores set out in Policy G6 of the London Plan. Biodiversity improvements will therefore be monitored in this way.

Enhancement of open space will be monitored through the delivery of the emerging 'Mitigating the Impact of Development on SAC SPD' and air quality within the Borough is monitored on an ongoing basis.

In monitoring outcomes, a proactive approach will be used by the Council. Where necessary, new indicators will be created and obsolete indicators will be deleted or amended to meet changing circumstances in the way data is collated.

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.

The 'Monitoring Indicators and Targets' set out within the Local Plan Appendix 5 will be checked following the Local Plan Examination in order to ensure that the indicators address all of the predicted residual effects identified in the SAs of LP1 and LP2 (Site Allocations Document). If



they don't, new indicators will be identified. The monitoring indicators will be presented within the SA adoption statement.

11 Next steps

This SA Report is being published for consultation alongside the Regulation 19 version of the Draft Site Allocations Document.

Following consultation on both this report and the Site Allocations Document, comments received on both the plan and this SA Report will be considered. Any necessary changes will be made to the SA Report and to the Site Allocations Document in response to consultee comments prior to its Submission to the Secretary of State.

The SEA Regulations require monitoring of the significant environmental effects of implementing the Site Allocations Document (LP2). SA monitoring will cover the significant economic and social effects, as well as the environmental ones. A proposed monitoring schedule will be included within the adoption statement which will be published as soon as possible after the Site Allocations Document (LP2) is adopted. The proposed monitoring schedule will focus specifically on the monitoring of any residual significant negative or uncertain effects.

Table 101: Waltham Forest Local Plan Site Allocations Document Timetable

Plan Activity	Timeframe
Consultation on Regulation 19 Local Plan (Part 2) Site Allocations Document	8 November 2021 to 14 January 2022
Examination in Public	Q2 2022
Local Plan (Part 2) Site Allocations Document is adopted subject to receipt of the Inspector's Report	Q4 2022