



**London Borough of Waltham Forest
Local Plan Draft Site Allocations Document (Regulation 18)
Sustainability Appraisal**

Non-Technical Summary



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1 Introduction

This Non-Technical Summary (NTS) summarises the findings of the Sustainability Appraisal (SA) Report for the Waltham Forest Draft Local Plan Site Allocations Document being prepared by the London Borough of Waltham Forest (LBWF) Council. The Site Allocations Document 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.

ClearLead Consulting Ltd have been commissioned by LBWF to undertake the SA of the Site Allocations Document. The SA Report accompanies the draft Site Allocations Document which sets out the Council's preferred site allocations for delivering new development up to 2035.

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

1.1 What is a Sustainability Appraisal?

An SA has been undertaken of the LBWF Site Allocations Document as required by the Planning and Compulsory Purchase Act 2004, the National Planning Policy Framework (February 2019) and 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. SA is used to evaluate Local Plans against a set of objectives developed in consultation with interested parties. The purpose of the assessment is to avoid adverse environmental, social and economic effects, as well as identifying opportunities to improve the quality of Waltham Forest and the quality of life of residents in the borough.

This SA sets out the appraisal of sites contained within the Site Allocations Document and the potential impact they could have on the three elements of sustainability: economy, environment and society. This work will be further refined for the proposed submission version of the Site Allocations Document in Spring 2021.

1.2 How to Comment on the Sustainability Appraisal

This report is being consulted on with the public and statutory consultees¹ 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 ten weeks from 24th September 2020 until 14th December 2020. We welcome your views on this SA Report during this period. A series of questions are set out below in order to guide responses.

¹ Environment Agency, Historic England and Natural England.

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 December 2020** to:
Planning Policy Team, London Borough of Waltham Forest,
First Floor
Magistrates Court,
Town Hall Complex,
Forest Road,
1 Farnan Avenue London
E17 4JFNX

1.3 The Waltham Forest Borough Council Draft Local Plan

The 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 (2012) for the LBWF.

The Council's Local Plan is being produced in two parts. The Proposed Submission Version of the Local Plan is the overarching strategic policy document and represents Part 1 of the Local Plan 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. The Site Allocations Document 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.

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 52,000m² 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.

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.

1.4 The Content of the Site Allocations Document

The Site Allocations Document sets out what uses and development the Council would prefer to be delivered 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, will include:

- 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 of 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. The public consultation was undertaken during the period 18th March to 23rd April 2020. The Council has since prepared a draft Site Allocations Document and the SA Report accompanies the Site Allocations Document in the Regulation 18 consultation.

Table NTS1 lists the sites currently included in the Site Allocations Document (SAD) and which have been assessed as part of this SA.

Table NTS1: Sites contained within the SAD

| Site reference | Site Name | Site reference | Site Name |
|----------------|---|----------------|---|
| SA01 | Leyton Mills Retail Park | SA33 | 152-154 Blackhorse Road |
| SA02 | New Spitalfields Market | SA34 | Standard Public House_1 Blackhorse Lane |
| SA03 | Bywaters Leyton | SA35 | Webbs |
| SA04 | 9 Osier Way Pocket Living | SA36 | 59-69 Sutherland Road |
| SA05 | The Score Centre | SA37 | Wood Street Library |
| SA06 | Lea Bridge Gasholders | SA38 | The Town Hall Campus, The Magistrates Town Hall Car Park and Sycamore House |
| SA07 | Lea Bridge Site | SA39 | Sterling House Willow House Homebase Forest Road |
| SA08 | Hare and Hounds Football Ground Former Wingate Stadium Site Lea Bridge Road | SA40a | Hylands Road Phase 1-2 |
| SA09 | Estate Way | SA40b | Hylands Road Phase 1-2 |
| SA10 | Low Hall Depot | SA41 | Crown Lea |
| SA11 | Leyton Leisure Lagoon Leyton Leisure Centre | SA42 | Wood Street Station Site |
| SA12 | TESCO Bakers Arms | SA43 | Travis Perkins |
| SA13 | Stanley Road Car Park | SA44 | Brandon Road Car Park |
| SA14 | 806 Community Place High Road Leyton | SA45 | Priory Court |
| SA15 | Leyton Bus Depot | SA46 | 234-240 Billet Road |
| SA16 | The Territorial Army Centre | SA47 | Dog Track Carpark and Sainsburys |
| SA17 | Whipps Cross University Hospital | SA48 | Cork Tree Retail Park |
| SA18 | Joseph Ray Road | SA49 | Morrisons Supermarket and Car Park |
| SA19 | Church Lane Car Park Leytonstone | SA50 | Sainsburys Hall Lane |
| SA20 | TESCO Leytonstone | SA51 | South Chingford Library |
| SA21 | Matalan Leytonstone | SA52 | Iceland Old Church Road |

| Site reference | Site Name | Site reference | Site Name |
|----------------|--|----------------|---|
| SA22a | Avenue Road and Langthorne Close (Snowberry Centre) | SA53 | Motorpoint, Sewardstone Road |
| SA22b | Avenue Road and Langthorne Close (Avenue Road Estate) | SA54 | Lea Valley Motor Company |
| SA22c | Avenue Road and Langthorne Close (Langthorne Centre) | SA55 | 60-74 Sewardstone Road |
| SA22d | Avenue Road and Langthorne Close (NELFT, Thorne Close) | SA56a | Budgens |
| SA22e | Avenue Road and Langthorne Close (Click Centre) | SA56b | Gresham Works |
| SA23 | Cathall Leisure Centre The Epicentre Community Centre Jubilee Centre | SA57 | UKPN Site |
| SA24 | B&M Howard Road | SA58 | Chingford Library and Assembly Hall |
| SA25 | Norlington Road Sites | SA59 | North City Motors North Chingford |
| SA26 | Walthamstow Central Bus Station | SA60 | Royal Epping Forest Golf Club |
| SA27 | The Mall | SA61 | Chingford Station Car Park and Bus Terminal |
| SA28 | St James Quarter | SA62 | 472_510 Larkshall Road and James Yard |
| SA29 | High Street Sainsburys | SA63 | Shell Garage Highams Park |
| SA30 | Wilkos Walthamstow High Street | SA64 | Larkwood Leisure Centre Nursery and land to rear of Larkwood Leisure Centre |
| SA31 | Osborne Grove | SA65 | Pear Tree House |
| SA32 | Stow Car Wash & Valeting Hoe Street Walthamstow Trades Hall | | |

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

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

Table NTS2 presents this information. This section presents the key sustainability issues currently affecting Waltham Forest and the predicted future evolution of the baseline without the draft Local Plan. This section is supported by Appendix A to the full SA Report which presents the full review of baseline data for the borough. Appendix B also presents the review of other policies and plans which could have an influence or be affected by the development of the draft local plan.

The initial baseline data was gathered in January to March 2020. This identified data relevant to Waltham Forest, and was placed into the following categories:

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

This baseline was then consulted on with statutory consultees² between 18th March 2020 to 23rd April 2020. A subsequent update was undertaken in response to comments received, forming a post consultation version in August 2020. In some cases, the most recent data available, such as Census and SSSI condition data, is now in excess of five years old. This may not therefore reflect current trends within the borough. No other difficulties have been encountered in collating the baseline data. Some assumptions have been made in the assessments of the sites. These assumptions are detailed within Section 2.5 of the full SA Report.

² Natural England, Historic England and the Environment Agency

Table NTS2: Sustainability Issues & Likely Evolution without the Draft Plan

| Theme | Sustainability Issues | Likely Evolution Without the Draft Plan |
|--------------|---|--|
| Population | <ul style="list-style-type: none"> As the population continues to increase so does the demand for housing, infrastructure, facilities and employment. The population density within the borough exceeds both the London and the national averages. There is a need to create high quality places to live, work and recreate that are mixed and well-balanced in terms of tenure and income. Adequate support and facilities for older residents, including independent living, has been noted in particular to be needed. There is a need to build on the borough's arts, culture and sport strengths across the borough's diverse and changing population. There is a need to provide inclusive services; promote equal opportunities; oppose discrimination, intolerance and disadvantage through reducing inequalities and promoting community cohesion. There is a need to reduce the number of older people who feel socially isolated, by getting them actively participating in community life. | <ul style="list-style-type: none"> There is likely to be an increase in housing demand due the continued population increase within the borough. Continuing pressure to provide inclusive services which can meet the needs of all local residents. An increased demand for healthcare of those over 50. |
| Human Health | <ul style="list-style-type: none"> Currently a large proportion of the population are aged over 50 and this is projected to rise over the next 20 years (+26% rise by 2021³). 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. | <ul style="list-style-type: none"> There may be additional strain placed on the borough's health and social care resources due to the continual growth of proportion of the population over 50. The disparity between wards with regards to deprivation, overcrowding and poverty could widen Mental health issue of residents is expected to increase in |

³ GLA, 2015 Population projections

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| | <ul style="list-style-type: none"> • Need to increase levels of active travel throughout the borough in order to increase physical activity levels and tackle poor air quality. • 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. • Need to ensure that hospitals have fit for purpose facilities (i.e. less converted houses) that meet the needs of patients. | <p>severity and incidence, especially in those over 65. This could increase hospital admissions.</p> |
| Economy | <ul style="list-style-type: none"> • Ensure that ongoing business growth becomes a driver of productivity and fairer wages (e.g. encouraging the London Living Wage), in order to create an increase in the overall prosperity of the Waltham Forest borough. • Continue to support the Upper Lee Valley Development Opportunity Area and celebrate its industrial heritage. • Support 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. | <ul style="list-style-type: none"> • Pressure on industrial areas to provide business space may increase due to an increase in population and businesses within the borough. • There may be increased pressure on employment land for housing development, as the population of Waltham Forest continues to rise. • It has been noted 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. |
| Employment and Skills | <ul style="list-style-type: none"> • Investment is needed so that local people have the skills and ability to seize local growth opportunities and they are able to access and progress into high-quality, better paid employment in the borough. • There are large inequalities in employment and skill levels between wards within the borough. Need to ensure that regeneration is inclusive. • 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. | <ul style="list-style-type: none"> • Disparities in employment levels between wards may continue to widen. • Opportunities for new businesses in the area may not arise, preventing an increase in employment and demand for higher educated employees. |

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| | <ul style="list-style-type: none"> • 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. • 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. | <ul style="list-style-type: none"> • It has been noted 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. |
| <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Transport</p> | <ul style="list-style-type: none"> • Continual growth in car ownership will contribute to further air pollution, and associated impacts on climate, human health and biodiversity. • Need to work towards improving air quality and reducing noise impacts from transport. • There is a need to make public transport more accessible in some areas of the borough. • There is a need to promote walking and cycling (building on Enjoy Waltham Forest (“Mini Holland”) programmes) for local journeys in place of travel by private car. There should also be a focus on promoting public transport use instead of cars for medium and longer journeys. • There is a need to reduce car parking spaces in order to discourage private car use and improve air quality. • One in five journeys each weekday morning and afternoon involves trips to school, even though most journeys to schools are under a mile. There is a need to reduce school journeys by reducing Drop Off/Pick Up arrangements for new school developments, and encouraging sustainable, active travel amongst school pupils. • There is a need to provide electric vehicle infrastructure, such as charging points. • As the population grows, so does the need to change current infrastructure to meet the demands of all residents, whilst making it future proof. • Need to provide public transport capacity and safeguard land for transport. • Help to enhance London’s transport connectivity. • Improvements to road safety are needed to reduce casualties. • Need to make cycle parking safer and easier to use. | <ul style="list-style-type: none"> • Rise in car ownership is expected to continue. • Inadequate electric vehicle infrastructure. |
| <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Crime and Safet</p> | <ul style="list-style-type: none"> • 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. | <ul style="list-style-type: none"> • Continued increase in homicide and drugs related crime. |

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| | <ul style="list-style-type: none"> • 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. • There is no clear trend for crime across the borough, however rates are highest in High Street ward. | |
| Housing | <ul style="list-style-type: none"> • There is a disparity between the cost of housing and the amount that people are able to borrow to purchase a home, which means that many people are unable to access the property market. • There is a shortfall in the provision of affordable housing to meet the requirements of those in housing need. • Homelessness is expected to increase. • Need to offer greater quality, flexibility and choice to those who rent. • Need to increase the supply of well-designed housing of all tenures. • Need to introduce more flexible approaches for affordable housing contributions to encourage open market and mixed tenure specialist older people's housing. | <ul style="list-style-type: none"> • House prices will continue to rise above the London average, making it increasingly difficult for low income households to purchase property. |
| Townscape and Heritage | <ul style="list-style-type: none"> • A number of listed buildings are identified as being in poor condition and 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 21 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. | <ul style="list-style-type: none"> • Development may encroach on conservation area and could negatively affect townscape and heritage areas. • Assets on the 'Heritage at Risk' register may not be improved in condition. |
| Climate | <ul style="list-style-type: none"> • Reliance on the petrol or diesel-fuelled private car as the main mode of transport. • Greenhouse gas emissions need to be stabilised and reduced over time. • Need to provide electric vehicle infrastructure, such as charging points. • Need to plan for and implement/facilitate climate change adaptation, in respect of rising temperatures, water scarcity and extreme weather events, particularly heavy rainfall/flooding. | <ul style="list-style-type: none"> • Greenhouse gas emissions could rise. • Increase in mean annual temperatures. |

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| | <ul style="list-style-type: none"> • Need to continue to promote the construction of energy efficient buildings, and to support the installation of renewable and low or zero carbon technology. • Need to plan and prepare for the expected impacts of unavoidable climate change by developing adaptation responses and building resilience. • New developments need to minimise vulnerability and provide resilience to climate change. • Need to work with communities to help tackle climate change. • Help promote low carbon heat network. • Need to identify opportunities for growth of the low carbon economy in the Upper Lee Valley. | |
| <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Air Quality</p> | <ul style="list-style-type: none"> • Need to help reduce pollution from road vehicles, buildings, industry and construction. • Reliance on the petrol or diesel-fuelled private car as the main mode of transport. • Air pollution from the strategic road network is an issue across the borough and NO₂ emissions have remained constant, not decreasing as predicted. • Increasing use of biofuels (biodiesel and biomass) will cause further air quality issues; and • Need to improve efficacy of measures within the AQMA. | <ul style="list-style-type: none"> • Air pollution will continue to be an issue. • Vehicle ownership will continue to rise. |
| <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Soils and Geology</p> | <ul style="list-style-type: none"> • There is finite availability of previously developed land for development; this may result in the use of greenfield land in the future. • There is a need to protect soils and the important ecosystem services they provide – particularly during construction and development. • There is a need to protect designated geological sites. | <ul style="list-style-type: none"> • It is unclear if there will be sufficient previously developed land to sustain new development. This could lead to increased development pressure on greenfield sites. |

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| Water | <ul style="list-style-type: none"> • 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. | <ul style="list-style-type: none"> • Increases in population will drive further water demand in the borough, thus increasing pressure on water resources. • Loss of green space could decrease water infiltration, increase surface runoff, therefore increasing flood risk. |
| Biodiversity | <ul style="list-style-type: none"> • Large areas of the SSSI sites are considered to be in either unfavourable with no change or an unfavourable and declining condition. • Increases in population will cause a demand for more development, where there is a potential for loss of valuable habitats which have yet to be designated for nature conservation as a direct result. • SSSIs and European sites within the borough are under threat from poor air quality, recreational pressure and urban effects (including issues with litter). | <ul style="list-style-type: none"> • The condition of SSSIs may continue to decline, and in some cases increase due to worsening air quality. |

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| | <ul style="list-style-type: none"> • 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. • 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. | |
| Landscape | <ul style="list-style-type: none"> • Large areas of open space are Metropolitan Green Belt. There is a need to protect these areas of open space from development pressure. • Need to work to conserve and enhance the local environment. • Need to establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit. • Need to work towards conserving local character and history, by reflecting the identity of local surroundings and materials. This should not prevent or discourage appropriate innovation. | <ul style="list-style-type: none"> • Development pressure could lead to the loss of amenity land or open space. |
| Waste | <ul style="list-style-type: none"> • The amount of waste produced is reducing but still exceeds both the London and national average. • The London Plan encourages greater self-sufficiency for waste management in London and sustainable transportation of waste. • Recycling is increasing but continues to fall short of government targets. • Need to minimise the impact of municipal waste management on the borough's environment. • Need to reduce the carbon footprint of municipal waste. • Need to ensure that all waste is managed in the most environmentally friendly way. • Need to ensure that future development will not compromise the ability of the borough to deal with waste. | <ul style="list-style-type: none"> • Generation of waste is slowly expected to decrease. |

2 How the Plan and its Alternatives Were Assessed

The sustainability issues and the environmental protection objectives of other plans, programmes and policies which are relevant to the Site Allocations Document have been reviewed and these, along with the sustainability issues identified through the baseline review have been used to develop a framework of sustainability objectives which have been used to assess the plan. The SA Framework is presented in Table NTS3.

Table NTS3: SA Framework

| SA Objective | Description |
|--------------|--|
| SA1 | Meet local housing needs through the provision of a range of tenures and sizes of new dwellings |
| SA2 | Improve standard of health and wellbeing of those who live and work in the borough |
| SA3 | Improve community cohesion and reduce inequalities through the provision of community facilities to meet local cultural, educational, recreational and social needs |
| SA4 | Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system, reducing car use for all journey lengths |
| SA5 | Reduce greenhouse gas emissions and promote low carbon growth |
| SA6 | Improve air quality |
| SA7 | Improve water quality in rivers and groundwater and ensure the efficient use of water resources |
| SA8 | Reduce the risk of flooding and improve resilience to climate change |
| SA9 | Ensure the efficient use of land and buildings and protect soil quality and geological resources |
| SA10 | Conserve and enhance biodiversity and the natural environment, improving resilience to climate change |
| SA11 | Protect the ecological integrity of SSSI and Natura 2000 sites |
| SA12 | Maintain and enhance the quality of the green belt and open space areas |
| SA13 | Conserve and enhance the historic environment |
| SA14 | Maintain and enhance the vitality and viability of the borough's town centres |
| SA15 | Improve the local economy by enabling employment developments in appropriate places |
| SA16 | Maintain stable levels of employment in the borough |

3 Assessment of Alternatives and the Reasons for Choosing the Plan

The alternative options considered include the following:

- Six strategic spatial options (Local Plan Part 1 Direction of Travel, 2017);
- A preferred and an alternative spatial strategy options in 2018 (reported within the Local Plan Part 1 SA Report (October 2019));
- 22 alternative sites which will not be included within the Site Allocations Document but the council consider have the potential to come forward. It should be noted that these sites are not considered to be available and deliverable at present. However, the local authority is aware that these sites may come forward either as alternative sites or as well as the proposed sites. These alternative sites have therefore been assessed as alternative sites to the proposed allocation sites in case they do become available and deliverable in the future.

The alternative sites are listed in Table NTS4 below.

Table NTS4: Alternative Sites

| Site reference | Site Name |
|----------------|--|
| WND01 | Aldriche Way Estate |
| WND02 | Highams Park BEA |
| WND03 | Uplands |
| WND04 | Rigg Approach |
| 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 |
| WND15 | Lammas Road (SIL) |
| WND16 | Royal Mail Sorting Office, Church Hill |
| WND17 | Golden Business Park (SIL7) |
| WND18 | Costco and Land at Harbet Road |
| WND19 | Waltham Park Way (BEA) |
| WND20 | Trinity Way and Avenue Business Park (BEA) |
| WND21 | Deacon Trading Estate (BEA) |
| WND22 | Walthamstow Business Centre |

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 Strategy⁴. 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 the Borough that Waltham Forest Council wish to locate future development. Site allocations have been identified within, but are not entirely limited to, the strategic locations.

The alternative sites have been assessed alongside the proposed site allocations to the same level of detail as the proposed allocation sites. The detailed potential sustainability effects of the alternative sites are presented within Appendix C and are summarised in Section 4.2 of this report.

⁴ Waltham Forest Local Plan Core Strategy Adopted March 2012
<https://www.walthamforest.gov.uk/content/core-strategy>

4 Sustainability Assessment of the Draft Site Allocations Document

4.1 Sites Assessment

The sites detailed within the Site Allocations Document were assessed for their sustainability effects. The plan has generally performed very positively, and the assessment has identified that the draft Site Allocations Document is likely to result in 238 potential significant positive effects across 71 sites.

A total of 10 potential significant negative and 128 potential uncertain effects were identified. The uncertain effects predominately related to SA objective 11 (SA11) which concerns the protection of the ecological integrity of Natura 2000 sites. It is possible that development within Waltham Forest could lead to increased pressure on important internationally designated wildlife sites located within the borough. The potential for such affects arising as a result of the plan alone and in combination with development in neighbouring areas is being investigated within the parallel Habitats Regulations Assessment which has not yet been concluded. Once it has been concluded the SA will be updated.

Uncertain effects identified for SA objective 4 (SA4) relate to delivery of improvements to sustainable transport connections.

A summary of the potential effects of the proposal site allocations against all of the SA objectives is presented in Table NTS6. A key to the effects is provided in Table NTS5.

Table NTS5: Significance definitions for Sustainability Appraisal

| 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 key sustainability issues and could result in a potentially significant beneficial effect e.g. improved | Permanent 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: <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; |

| Symbol | Definitions of Significance of Effects Against the SA Objectives | Assumptions on the nature of effects |
|--------|--|---|
| | access by walking and cycling modes to a local or town centre | <ul style="list-style-type: none"> • 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 key sustainability issues, although it may have only a minor beneficial effect | Reversible Infrequent or intermittent Magnitude: Low 20-40% of receptor or capacity affected. The size, nature and location of a proposed scheme would: <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 key sustainability issues and may result in minor adverse effects | Reversible Infrequent or intermittent Magnitude: Low 20-40% of receptor or capacity affected. The size, nature and location of a proposed scheme would: <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. |

| Symbol | Definitions of Significance of Effects Against the SA Objectives | Assumptions on the nature of effects |
|--------|--|---|
| -- | <p>Significant Negative Effect: the site allocation works against the achievement of this objective; it could exacerbate relevant key sustainability issues 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> | <p>Permanent Irreversible 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"> 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. |

Table NTS6: Summary of Potential Effects.

| Site ref | SA1 | SA2 | SA3 | SA4 | SA5 | SA6 | SA7 | SA8 | SA9 | SA10 | SA11 | SA12 | SA13 | SA14 | SA15 | SA16 |
|----------|-----|-----|-----|-----|-----|-----|-----|-----|-----|------|------|------|------|------|------|------|
| SA01 | ++ | -- | ? | ? | + | 0 | 0 | 0 | ++ | + | ? | 0 | 0 | + | ++ | + |
| SA02 | ++ | -- | ? | ? | + | 0 | 0 | 0 | ++ | 0 | ? | 0 | 0 | 0 | ++ | + |
| SA03 | ++ | ++ | ? | ? | + | 0 | 0 | 0 | ++ | 0 | ? | 0 | 0 | + | ++ | + |
| SA04 | ++ | ++ | ? | ? | + | 0 | 0 | 0 | ++ | 0 | ? | 0 | 0 | + | ? | ? |
| SA05 | ++ | ++ | ++ | ? | + | 0 | 0 | 0 | ++ | 0 | ? | 0 | 0 | + | ++ | + |
| SA06 | + | + | - | ? | + | 0 | 0 | 0 | ++ | 0 | ? | 0 | 0 | 0 | ? | + |
| SA07 | ++ | -- | - | - | 0 | 0 | 0 | ? | + | 0 | ? | 0 | 0 | 0 | + | + |
| SA08 | ++ | ++ | + | - | + | 0 | 0 | ? | ++ | 0 | ? | 0 | 0 | 0 | ++ | + |
| SA09 | ++ | + | ? | - | + | 0 | 0 | ? | ++ | 0 | ? | 0 | 0 | 0 | ++ | + |
| SA10 | ++ | - | -- | - | 0 | 0 | 0 | ? | ++ | 0 | ? | 0 | 0 | 0 | ++ | + |
| SA11 | ++ | ++ | ++ | ++ | 0 | ++ | 0 | 0 | ++ | 0 | ? | 0 | 0 | + | + | + |

| Site ref | SA1 | SA2 | SA3 | SA4 | SA5 | SA6 | SA7 | SA8 | SA9 | SA10 | SA11 | SA12 | SA13 | SA14 | SA15 | SA16 |
|----------|-----|-----|-----|-----|-----|-----|-----|-----|-----|------|------|------|------|------|------|------|
| SA12 | ++ | + | ++ | ++ | 0 | ++ | 0 | 0 | ++ | 0 | ? | 0 | 0 | + | ++ | + |
| SA13 | ++ | + | + | + | 0 | + | 0 | 0 | ++ | 0 | ? | 0 | 0 | + | + | + |
| SA14 | ++ | + | ++ | ++ | 0 | ++ | 0 | 0 | ++ | 0 | ? | 0 | 0 | + | + | + |
| SA15 | ++ | ++ | ++ | ++ | 0 | ++ | 0 | 0 | ++ | 0 | ? | 0 | 0 | + | + | + |
| SA16 | ++ | + | + | + | 0 | + | 0 | + | ++ | 0 | ? | 0 | 0 | 0 | + | + |
| SA17 | ++ | + | ? | ? | 0 | - | 0 | 0 | ++ | 0 | ? | 0 | 0 | 0 | - | + |
| SA18 | ++ | ++ | ++ | ++ | + | ++ | 0 | 0 | ++ | 0 | ? | 0 | 0 | + | ++ | ++ |
| SA19 | ++ | ++ | ++ | ++ | 0 | ++ | 0 | 0 | ++ | 0 | ? | 0 | 0 | + | ? | ? |
| SA20 | ++ | ++ | ++ | + | 0 | + | - | 0 | ++ | 0 | ? | 0 | 0 | + | ++ | + |
| SA21 | ++ | ++ | ++ | ++ | + | ++ | 0 | 0 | ++ | 0 | ? | 0 | 0 | + | ? | ? |
| SA22a | ++ | ++ | ++ | - | + | 0 | 0 | 0 | ++ | 0 | ? | 0 | 0 | 0 | + | + |
| SA22b | ++ | ++ | ++ | - | + | 0 | 0 | 0 | ++ | 0 | ? | 0 | 0 | 0 | + | + |
| SA22c | ++ | ++ | ++ | - | + | 0 | 0 | 0 | ++ | 0 | ? | 0 | 0 | 0 | + | + |
| SA22d | 0 | 0 | 0 | + | + | 0 | 0 | 0 | ++ | 0 | ? | 0 | ? | 0 | 0 | + |
| SA22e | + | ++ | ++ | - | + | 0 | 0 | 0 | ++ | 0 | ? | 0 | 0 | 0 | ++ | + |
| SA23 | ++ | ++ | ++ | - | + | 0 | 0 | 0 | ++ | 0 | ? | 0 | 0 | 0 | ++ | + |
| SA24 | ++ | + | ++ | - | + | 0 | 0 | 0 | ++ | 0 | ? | 0 | 0 | 0 | ? | + |
| SA25 | ++ | + | 0 | - | 0 | + | 0 | 0 | ++ | 0 | ? | 0 | 0 | 0 | + | + |
| SA26 | ++ | + | + | ++ | 0 | ++ | 0 | 0 | ++ | 0 | ? | 0 | 0 | ++ | + | + |
| SA27 | ++ | + | + | ++ | + | + | 0 | 0 | ++ | 0 | ? | 0 | 0 | ++ | ++ | ++ |
| SA28 | ++ | ++ | ++ | ++ | ++ | ++ | 0 | 0 | ++ | 0 | ? | 0 | 0 | ++ | + | + |
| SA29 | ++ | + | + | ++ | 0 | ++ | 0 | 0 | ++ | 0 | ? | 0 | 0 | ++ | ++ | ++ |
| SA30 | ++ | + | + | ++ | 0 | ++ | 0 | 0 | ++ | 0 | ? | 0 | 0 | ++ | + | + |
| SA31 | + | + | + | ++ | 0 | ++ | 0 | 0 | ++ | 0 | ? | 0 | 0 | ++ | + | ++ |
| SA32 | ++ | ++ | ++ | 0 | ++ | 0 | 0 | 0 | ++ | 0 | ? | 0 | 0 | + | ++ | + |
| SA33 | ++ | + | ++ | ++ | + | + | 0 | 0 | ++ | 0 | ? | 0 | 0 | + | + | + |
| SA34 | ++ | + | ++ | ++ | + | + | 0 | 0 | ++ | 0 | ? | 0 | 0 | 0 | + | + |
| SA35 | ++ | 0 | 0 | ? | + | + | 0 | 0 | ++ | 0 | ? | 0 | 0 | + | + | + |

| Site ref | SA1 | SA2 | SA3 | SA4 | SA5 | SA6 | SA7 | SA8 | SA9 | SA10 | SA11 | SA12 | SA13 | SA14 | SA15 | SA16 |
|----------|-----|-----|-----|-----|-----|-----|-----|-----|-----|------|------|------|------|------|------|------|
| SA36 | ++ | + | + | ? | + | + | 0 | 0 | ++ | 0 | ? | 0 | 0 | 0 | ? | ? |
| SA37 | ++ | + | ++ | 0 | + | 0 | 0 | 0 | ++ | 0 | ? | 0 | ? | + | + | + |
| SA38 | ++ | ++ | ++ | - | + | 0 | 0 | 0 | ++ | 0 | ? | 0 | 0 | 0 | ? | + |
| SA39 | ++ | - | ++ | - | + | 0 | 0 | 0 | ++ | 0 | ? | 0 | 0 | + | + | + |
| SA40a | ++ | -- | -- | ? | 0 | 0 | 0 | 0 | ++ | 0 | ? | 0 | 0 | 0 | + | + |
| SA40b | ++ | -- | -- | ? | 0 | 0 | 0 | 0 | ++ | 0 | ? | 0 | 0 | 0 | + | + |
| SA41 | ++ | + | + | - | 0 | + | 0 | + | ++ | 0 | ? | 0 | 0 | + | ++ | + |
| SA42 | ++ | + | + | + | + | + | 0 | + | ++ | 0 | ? | 0 | 0 | + | ++ | + |
| SA43 | ++ | + | + | - | + | + | 0 | + | ++ | 0 | ? | 0 | 0 | + | ++ | + |
| SA44 | + | + | - | + | + | + | 0 | + | ++ | 0 | ? | 0 | 0 | + | ++ | + |
| SA45 | ++ | ++ | ++ | ? | - | ? | 0 | 0 | ++ | 0 | ? | 0 | 0 | 0 | ? | ? |
| SA46 | ++ | + | + | ? | 0 | 0 | 0 | 0 | ++ | 0 | ? | 0 | 0 | 0 | ? | ? |
| SA47 | ++ | + | ? | ? | 0 | 0 | 0 | ? | ++ | 0 | ? | 0 | 0 | 0 | ? | ? |
| SA48 | 0 | 0 | 0 | -- | 0 | ? | 0 | ? | ++ | 0 | ? | 0 | 0 | 0 | ? | ? |
| SA49 | ++ | + | + | ? | 0 | 0 | 0 | ? | ++ | 0 | ? | 0 | 0 | + | ? | + |
| SA50 | ++ | + | + | + | 0 | + | 0 | 0 | + | 0 | ? | 0 | 0 | + | + | 0 |
| SA51 | ++ | + | ? | - | 0 | - | 0 | 0 | + | 0 | ? | 0 | 0 | 0 | + | - |
| SA52 | ++ | + | + | + | 0 | + | 0 | 0 | + | 0 | ? | 0 | 0 | + | + | 0 |
| SA53 | ++ | + | ? | - | 0 | 0 | 0 | ? | ++ | 0 | ? | 0 | 0 | + | + | + |
| SA54 | ++ | + | 0 | - | 0 | 0 | - | 0 | ++ | 0 | ? | 0 | 0 | + | + | + |
| SA55 | ++ | + | + | - | 0 | 0 | 0 | 0 | ++ | 0 | ? | 0 | 0 | + | + | + |
| SA56a | + | + | ++ | + | 0 | + | 0 | 0 | ++ | 0 | ? | 0 | 0 | + | ++ | + |
| SA56b | + | + | ++ | + | 0 | + | 0 | 0 | ++ | 0 | ? | 0 | 0 | + | ++ | + |
| SA57 | 0 | + | + | + | 0 | + | 0 | 0 | ++ | 0 | ? | 0 | 0 | + | ++ | + |
| SA58 | ++ | + | ++ | + | 0 | + | 0 | 0 | ++ | 0 | ? | 0 | 0 | + | ++ | + |
| SA59 | ++ | - | ++ | + | 0 | + | 0 | 0 | ++ | 0 | ? | 0 | 0 | + | ++ | + |
| SA60 | ++ | - | - | + | 0 | + | 0 | 0 | ++ | 0 | ? | 0 | 0 | + | + | + |
| SA61 | ++ | - | + | + | 0 | + | 0 | 0 | ++ | 0 | ? | 0 | 0 | + | ++ | + |

| Site ref | SA1 | SA2 | SA3 | SA4 | SA5 | SA6 | SA7 | SA8 | SA9 | SA10 | SA11 | SA12 | SA13 | SA14 | SA15 | SA16 |
|----------|-----|-----|-----|-----|-----|-----|-----|-----|-----|------|------|------|------|------|------|------|
| SA62 | ++ | + | + | - | 0 | - | 0 | 0 | + | 0 | ? | 0 | 0 | ++ | + | + |
| SA63 | + | - | + | - | 0 | - | 0 | 0 | + | 0 | ? | 0 | 0 | ++ | + | + |
| SA64 | ++ | ++ | -- | ? | 0 | 0 | 0 | 0 | + | 0 | ? | 0 | 0 | 0 | + | - |
| SA65 | ++ | - | - | + | 0 | + | 0 | 0 | ++ | 0 | ? | 0 | 0 | + | + | + |

4.2 Alternative Sites

The alternative sites were in the same way as the proposed site allocations in order to identify potential sustainability effects associated with developing them. The alternative sites also generally performed very positively, and the assessment has identified that the alternative sites, if considered together, would likely result in 59 potential significant positive effects across the 22 sites.

It is noticeable that there is a greater level of uncertainty within the assessment of the alternative sites with 62 potential uncertain effects identified. 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). It is currently uncertain whether redeveloping those sites would result in the loss of employment space.

An uncertain effect has been identified in relation to all alternative sites in relation to ‘SA Objective 11: Protect the ecological integrity of SSSI and Natura 2000 sites’. The parallel HRA screening exercise has 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 to the main SA Report. The HRA has not yet been concluded. Once it is concluded this SA will be updated.

A total of 6 potential significant negative effects were recorded. 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) because these sites are located within green belt or open space areas.

A summary of the potential effects of the alternative sites against all of the SA objectives is presented in Table NTS7.

Table NTS7: Summary of Potential Effects for Alternative sites.

| Site ref | SA1 | SA2 | SA3 | SA4 | SA5 | SA6 | SA7 | SA8 | SA9 | SA10 | SA11 | SA12 | SA13 | SA14 | SA15 | SA16 |
|----------|-----|-----|-----|-----|-----|-----|-----|-----|-----|------|------|------|------|------|------|------|
| WND01 | + | - | - | -- | 0 | ? | 0 | 0 | + | 0 | ? | 0 | 0 | + | + | + |
| WND02 | + | - | - | - | 0 | - | 0 | 0 | + | 0 | ? | 0 | 0 | + | ++ | + |
| WND03 | ++ | ? | 0 | ? | + | + | 0 | ? | ++ | 0 | ? | 0 | 0 | 0 | ? | + |
| WND04 | ++ | -- | - | - | + | 0 | 0 | 0 | + | 0 | ? | 0 | 0 | 0 | ? | + |
| WND05 | ? | ++ | ++ | - | + | 0 | 0 | 0 | ++ | 0 | ? | 0 | ? | + | + | + |
| WND06 | ++ | ++ | ++ | - | 0 | 0 | 0 | 0 | ++ | 0 | ? | 0 | 0 | + | ? | ? |
| WND07 | ? | ? | ? | ? | + | 0 | 0 | ? | ++ | 0 | ? | 0 | 0 | + | ? | ? |
| WND08 | ++ | - | + | + | 0 | + | 0 | 0 | ++ | 0 | ? | 0 | 0 | + | ++ | + |
| WND09 | ++ | - | ++ | 0 | + | 0 | 0 | 0 | ++ | 0 | ? | 0 | 0 | + | + | + |
| WND10 | ++ | + | - | - | 0 | 0 | 0 | ? | ++ | 0 | ? | -- | ? | 0 | + | + |
| WND11 | ? | + | ? | - | 0 | 0 | 0 | 0 | ++ | ? | ? | -- | 0 | 0 | + | + |
| WND12 | ++ | ++ | + | + | 0 | + | 0 | 0 | ++ | 0 | ? | 0 | 0 | ++ | ++ | ++ |
| WND13 | ++ | ++ | + | + | 0 | + | 0 | 0 | ++ | 0 | ? | 0 | 0 | ++ | ++ | + |
| WND14 | ++ | ++ | + | + | 0 | + | 0 | 0 | ++ | 0 | ? | 0 | 0 | ++ | ++ | + |
| WND15 | ++ | -- | - | - | 0 | 0 | 0 | 0 | + | 0 | ? | - | 0 | 0 | ? | + |
| WND16 | ++ | - | + | ++ | 0 | ++ | 0 | 0 | ++ | 0 | ? | 0 | 0 | ++ | + | + |
| WND17 | ++ | - | - | ? | 0 | 0 | 0 | ? | ++ | 0 | ? | 0 | 0 | 0 | ? | + |
| WND18 | ++ | + | ? | ? | 0 | 0 | 0 | ? | ++ | 0 | ? | -- | 0 | 0 | ? | + |
| WND19 | ++ | + | + | ? | 0 | 0 | 0 | ? | ++ | 0 | ? | 0 | 0 | 0 | ? | ? |
| WND20 | ++ | + | + | ? | 0 | 0 | 0 | ? | ++ | 0 | ? | 0 | 0 | 0 | ? | ? |
| WND21 | ++ | ++ | ? | ? | 0 | 0 | 0 | ? | ++ | 0 | ? | 0 | 0 | 0 | ++ | + |
| WND22 | ++ | - | ++ | - | 0 | 0 | 0 | 0 | ++ | 0 | ? | 0 | 0 | + | ++ | + |

4.3 Potential Cumulative effects of the Proposed Site Allocations

Several cumulative effects were also identified as having the potential to result from a combination of two or more site allocations. Four potential cumulative effects were predicted to occur with relation to SA objectives 1, 11, 15 and 16 as described below.

For **SA11** the cumulative effect was identified as having an uncertain cumulative effect in relation to the protected sites and biodiversity of Waltham Forest. Development within Waltham Forest could lead to increased pressure on important locally and internationally designated wildlife sites. There are currently SSSIs and Natura 2000 sites located within and near to the borough. The HRA screening of sites (stage 1 of the HRA) has identified potential in-combination effects from the development of allocation sites in respect of recreation pressure and urbanisation effects on Epping Forest SAC and Lee Valley SPA and Ramsar site and air quality effects on Epping Forest SAC.

The Appropriate Assessment (stage 2 of the HRA) is currently underway. It has so far concluded that there will be no adverse effects from the Site Allocations Document on the Lee Valley SPA and Ramsar site. It has not been possible yet to conclude the HRA in relation to potential effects on Epping Forest SAC in relation to air quality and in combination with development in neighbouring areas and therefore uncertain effects have been identified in the SA at this stage. The SA will be updated once the HRA has been concluded.

In contrast, for the SA objectives 1, 15 and 16 the cumulative effects were identified as being potentially significantly positive as follows:

- **SA1:** A potential 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 delivery 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.
- **SA15:** 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 there are currently no requirements for any of the allocation sites to support specific sectors, an uncertain potential cumulative effect has been identified for all sites in respect of SA15 (Improve the local economy by enabling employment developments in appropriate places).
- **SA16:** 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 positive and negative effects have been identified resulting from the development of one or more sites together. These are summarised below.

Lea Bridge & Church Lane Strategic Location: a potential significant negative cumulative effect has been identified in relation to a number of site allocations in relation to 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 SA07, SA06 and SA08, in combination could increase pressure on local primary schools. In addition, in relation to SA8 (Reduce the risk of flooding and improve resilience to climate change), the development of sites SA10, SA08, SA09, SA03 and SA04 in combination could lead to a decrease in infiltration and lag time from rain to Dagenham brook. T

Stewardstone Road Strategic Location: a potential significant negative cumulative effect has been identified in relation to a number of site allocations in relation to SA4 (Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system, reducing car use for all journey lengths). Traffic from development of sites SA55, SA53 and SA54 together could all increase the use of private car use due to limited public transport and cycling infrastructure access in the Sewardstone Road area.

North Chingford Strategic Location: 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 (SA65, SA61 and SA59). There is also potential for a significant negative cumulative effect to occur from development of sites SA65 and SA60, 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.

However, 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: There is potential for a significant positive cumulative effect if sites SA43 and SA44 were brought forward and developed in this area as it would improve the viability of existing and/or proposed district heat networks. There is also a potential for a significant positive cumulative effect to occur from development of all sites in this cluster (sites SA41-44) 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: There is potential for a significant positive cumulative effect across all sites within this strategic location 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: If a number of development sites within this location, including sites SA33, SA34, SA35 and SA36 and were brought forward, 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. An uncertain cumulative effect is recorded in relation to development at sites SA35 and SA36 because there is currently uncertainty that the required investment in sustainable transport would be delivered in order for a positive effect to be achieved.

North Circular Strategic Location: There is potential for a significant negative cumulative effect to occur with other potential allocation sites in the North Circular area which are lacking public transport access (Sites SA47, SA49, SA48), in relation to SA4 (Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system, reducing car use for all journey lengths).

Leyton Strategic Location: There is potential for a significant negative cumulative effect to occur from the development of sites SA01, SA02, SA03, SA04 and SA05 together, as all these sites are expected to require healthcare services from Leyton health centre. There is potential for a significant negative cumulative effect to occur as a result of the development of sites SA01, SA02, SA03, SA04 and SA05 in combination, as all five sites lack good public transport connections. If all six sites are delivered, 6,728 new homes will be created, along with 94,914m² of employment space. This could lead to an increase in demand for public transport in an area where this is lacking, and lead to an increase in private car journeys.

South Leytonstone Strategic Location: The development of sites SA22a, SA22b, SA22c and SA22e in combination could help to ensure a community with good access to a range of facilities is achieved which could help support improvements in community cohesion and equality of access, therefore, a potential significant positive cumulative effect has been identified. However, there is potential for a significant negative cumulative effect to occur, resulting from the development of sites SA22a, SA22b, SA22c, SA22d, SA22e, SA23 and SA24 in combination, as all have poor access to public transport, evidenced by poor PTAL scores.

Leytonstone Town Centre Strategic Location: The development of sites SA18, SA19 and SA21 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 in relation to air quality. In addition, the development of sites SA18, SA19, SA20 and SA21 in the Leytonstone District Centre area could help to enhance the vitality and viability of this town centre area. Therefore, a potential significant positive cumulative effect has been identified.

Forest Road Corridor Strategic Location: The development of sites SA40a and SA40b together could lead to the creation of 136 dwellings with poor access to healthcare facilities and formal recreation space. Therefore, a potential significant negative cumulative effect has been recorded.

Walthamstow Town Centre Strategic Location: The development of in this strategic location could help to increase sustainable travel use in the area, decreasing car use. Development of these sites should also support improving air quality, as most have good access to public transport and will be included in the ULEZ expansion in 2021. Therefore, potential significant positive cumulative effects have been identified. The development of sites in the Walthamstow Town Centre area is also likely to result in a significant positive cumulative effect in enhancing the vitality of this town centre.

Highams Park Strategic Location: Sites SA62 and SA63 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 such facilities. The cumulative effect of developing several sites in this area has the potential to increase pressure on existing healthcare services, due an increase in demand. Therefore, potential negative cumulative effects have been identified.

There is also potential for a minor negative cumulative effect to occur, resulting from the development of Sites SA62 and SA63 in combination, as all have poor access to public transport, evidenced by poor PTAL scores. This could increase the number of journeys made by private car and decrease the prevalence of sustainable travel. However, there is potential



for a positive cumulative effect to result from the development of sites SA62 and SA63 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.

4.4 Mitigation

The SA report has recommended mitigation measures to address potential significant negative effects and uncertainties identified and this mitigation is presented below in Table NTS8.

Table NTS8: Proposed Mitigation Measures

| Mitigation Measures | Sites Mitigation Measure Applies to |
|--|--|
| SA2: Improve standard of health and wellbeing of those who live and work in the borough | |
| Site allocation policy text should include a requirement to contribute to healthcare facilities required to meet needs of new development locally, in a coordinated manner with other development within the area. | SA60, SA65 |
| 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. | SA02, SA03, SA04, SA05, SA10, SA62, SA63, SA65, SA60, SA61, SA59 |
| 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. | SA07 |
| The creation of a footbridge over the railway line could enhance access to open space to the south of Lee Valley Tennis and Hockey Centre. On a development of this size, the provision of informal recreation space on site would also help to mitigate a potential significant negative effect. This requirement should be added to the allocation policy wording. | SA01 |
| 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. | SA40a, SA40b |
| 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 should include a requirement to ensure that the need for community facilities and informal recreation space are assessed and contributed to as appropriate in accordance with the Local Plan policies on Developer Contributions and Infrastructure and Social and Community Infrastructure. | SA01 |
| 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. | SA07, SA06, SA08, SA53, SA65, SA60, SA64 |
| Site allocation policy text could include a requirement to contribute to 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. | SA10, SA51, SA17, SA47 |

| Mitigation Measures | Sites Mitigation Measure Applies to |
|--|--|
| 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, SA04 |
| Clarification is needed as to the reprovision of facilities planned for this site. If some existing facilities will not be reprovided through development, then future residents may not be able to access the services and facilities they require and reprovision would be required in this neighbourhood if there is a demonstrated need. | SA09 |
| The new LBWF Open Space Strategy expected in 2020 may help to identify additional needs for informal recreation space in the Highams Park area. Opportunities for increase access to information recreation space in this area should be sought. | SA62, SA63 |
| 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. | SA40a, SA40b |
| SA4: Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system, reducing car use for all journey lengths | |
| An increase in public transport service frequency in accordance with the Local Plan Part 1 Policy 64 Public Transport would improve the performance of this site. This should be made a requirement of the allocation policy wording. | SA64, SA51, SA50 |
| Site allocation policy text should require the assessment of need for improved sustainable transport infrastructure and services in combination with other nearby developments in order to provide a co-ordinated sustainable transport network in this area which meets the needs of new residents, in accordance with the Local Plan Part 1 policies relating to public transport and active travel. | SA22a, SA22b, SA22c, SA22e, SA24, SA23, SA55 |
| 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. | SA06, SA47, SA49, SA48, SA36, SA46, SA02, SA03, SA53 |
| 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. | SA04, SA05, SA01 |
| 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. | SA02, SA03, SA04, SA05, SA01, SA17, SA40a, SA40b, SA45, SA64 |
| SA 6: 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. | SA45, SA64 |

| Mitigation Measures | Sites Mitigation Measure Applies to |
|---|--|
| 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. | SA53 |
| SA8: Reduce the risk of flooding and improve resilience to climate change | |
| LBWF to undertake sequential and exception test for this site. Undertake site FRA to demonstrate it can be safely designed for residential use. | SA10, SA07, SA06, SA08, SA09, SA03, SA04, SA53, SA47, SA49, SA48 |
| Unless addressed within the SFRA level 2 (not available at the time of assessment), the need to assess for in combination effects on flood risk to Dagenham Brook in relation to other development sites in this area should be added to the relevant site allocation policy text. | SA10, SA08, SA09, SA03, SA04 |
| SA9: Ensure the efficient use of land and buildings and protect soil quality and geological resources | |
| The site allocation policy wording should require the provision of an equivalent area of green space to that lost in the development, and maximise maintained tree coverage on the site. | SA64 |
| SA11: Protect the ecological integrity of SSSI and Natura 2000 sites | |
| The HRA of the Site Allocation Document will assess the potential for adverse effects on Epping Forest SAC resulting from development of each site alone and put forward any recommended mitigation, in light of mitigation being developed within in the Local Plan Part 1 policies and the Local Plan Part 1 HRA. | All proposed site allocation |
| 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. | SA37 |
| 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. | SA47, SA48 |
| Further details of the non-residential floorspace proposed for this site could be stipulated within site allocation policy text. | SA04, SA21, SA45, SA38 |
| 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. | SA06 |
| Industrial uses could be required to be provided on the allocation to prevent the loss of industrial uses across the Greater London region. | SA36 |

| Mitigation Measures | Sites Mitigation 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. | SA04, SA21, SA45, SA47, SA48, |
| 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. There are good transport links to and from this site, which gives potential for a positive effect to occur if employment space is provided. | SA36 |
| 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 |

5 Next Steps

This SA Report is being published for consultation alongside the Regulation 18 version of the Draft Site Allocations Document.

Following consultation on both this report and the Draft 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.

A publication version of the Site Allocations Document is expected to be published in Spring 2021 and this will be accompanied by an updated version of the SA Report (see Table NTS9).

The SEA Regulations require monitoring of the significant environmental effects of implementing the Site Allocations Document. SA monitoring will cover the significant economic and social effects, as well as the environmental ones. Details of proposed monitoring arrangements will be included within the next iteration of the SA Report which will present the potential residual effects of the Regulation 19 Site Allocations Document. The arrangements for monitoring will need to focus on the monitoring of any residual significant negative or uncertain effects.

Table NTS9: Waltham Forest Local Plan Site Allocations Timetable

| Plan Activity | Timeframe |
|--|-------------------------|
| Draft Site Allocations Document Consultation (Preferred Options) | September/December 2020 |
| Consultation comments considered | Q1 2021 |
| Consultation on Proposed Submission Plan | Q2 2021 |
| Submission | Q4 2021 |
| Examination | Q1 2022 |
| Adoption | Q3 2022 |