

**Waltham Forest**

# **Local Plan**

**Part 1**

**Shaping the Borough 2020-2035**

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**Adopted 2024**

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Translation

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## Foreword

### Planning for the inclusive growth Waltham Forest needs

Waltham Forest is a vibrant borough, rich in culture and diversity. It is nationally recognised as a great place to live and a great place to do business. Our neighbourhoods are special. Each is unique, with its own characteristics, history and communities. They are what make our borough such an amazing place. By planning for good, inclusive growth of exemplar design quality, we can deliver new affordable homes, workspaces, community spaces, parks, open spaces and cultural and creative opportunities, whilst also ensuring that this unique character is protected and enhanced.

It's one of the most important jobs the Council has. And it is through our Local Plan that we do it.

For decades, London simply hasn't built enough homes. Population growth and a lack of house-building has led to soaring house prices in the whole of London, including Waltham Forest. If we don't build enough homes in the borough, our young people will never be able to purchase their own home and we will never deliver enough affordable housing to meet the needs of the 6,000 people on our housing register. Through our new Local Plan, we can do something about that. We can steer the delivery of the 27,000 new homes that we know the borough needs whilst ensuring that the infrastructure needed to support them is provided, that local jobs and other facilities are secured, that flood risk is reduced, that communities are safe, that air quality is improved and that the unique and special characteristics of the borough are protected and enhanced. And we can do all of that whilst progressing towards our goal of making Waltham Forest a Zero Carbon Borough.

In line with our Climate Action Plan and 15 Minute Neighbourhood corporate framework, our new Local Plan seeks to ensure that our residents have the things that matter most to lead healthy, fulfilling, and sustainable lives within their local area. By planning positively for future growth over the next fifteen years, we can shape the borough for the next generation. We can deliver 15 Minute Neighbourhoods across the borough, making sure that development makes lasting and positive impacts on our communities and that everyone benefits from the investment it brings. I am determined that we will do all we can to bring these benefits to everyone who lives, works and studies in Waltham Forest. Our Local Plan is fundamental to achieving a fairer and more equal borough.



Cllr Ahsan Khan - Deputy Leader and Portfolio Lead Member for Housing and Regeneration



Foreword

## Introduction and Background

**1.1** The Waltham Forest Local Plan sets out the Council's spatial and planning policy framework to promote, shape and manage growth in the borough over the next 15 years. Through robust and independently examined evidence it establishes what is needed in the borough, including 27,000 new homes and 52,000sqm of new employment space, and it identifies the most suitable and sustainable locations for the delivery of inclusive growth to meet these needs.

**1.2** The Local Plan aims to go as far as possible to meet the evidenced need for new homes in the borough, whilst also securing high quality design, protecting and enhancing the character of local areas, providing new and improved green spaces and public realm, responding to the climate emergency, improving air quality, reducing surface water flood risk, creating safer places, reducing fear of crime, maximising the number of local jobs and employment space, and delivering a whole range of community infrastructure, including health facilities, a new hospital, public transport/station improvements, facilities for young people and new cultural amenities.

**1.3** In 2019, Waltham Forest became the Mayor's first ever London Borough of Culture. Building on that success, the Local Plan seeks to deliver a lasting cultural legacy to the benefit of everyone in the borough by promoting culture and creativity.

**1.4** In November 2022, the Council launched its Climate Action Plan, which sets out Waltham Forest's commitment to reaching net zero carbon emissions by 2030. By planning for a Zero Carbon Borough, the Local Plan establishes the spatial and planning policy framework within which this will be achieved. This includes building energy efficient buildings, designing places for people not cars, ensuring we consume less and recycle more and creating a greener, more resilient borough.

**1.5** In February 2023 the Council introduced a 15 Minute Neighbourhood corporate framework. 15 Minute Neighbourhoods are places where people can easily reach most, if not all, of the facilities, experiences and activities they need on a daily basis, within a short walk, wheel, or cycle from home. The Local Plan's spatial strategy and planning policies will deliver this ambition through the creation of healthy, safe neighbourhoods, by tackling the impacts of the climate emergency, by celebrating culture in every community, by creating opportunities for socialising, leisure, and play, by designing open and accessible public spaces, by delivering more affordable, quality homes and by ensuring there are quality learning, skills development and employment opportunities within easy reach.

**1.6** Underpinning the Local Plan's spatial strategy is the fundamental principle that inclusive growth should be directed to previously developed sites. In their current state these sites may be dominated by swathes of hard surfaced car parks, or out of town, out of character, retail parks and supermarkets. In their place, the Local Plan seeks well designed, well landscaped, green and biodiverse new places that play their part in fighting the climate emergency, sit at the heart of vibrant 15 Minute Neighbourhoods, improve air quality across the borough and reduce the risk of surface water flooding. Furthermore, by directing inclusive growth to previously developed sites, the borough's existing green and open spaces can be preserved and enhanced.

## The Structure of the Local Plan

**1.7** The Waltham Forest Local Plan is being produced in two parts. This is Part 1 - it sets out the borough-wide spatial strategy and planning policies to guide development. It will be complemented by Part 2, a Site Allocations document, which will identify the key and strategic sites across the borough where it is anticipated inclusive growth will be delivered. Part 2 will establish key deliverables and expectations for these "site allocations" to ensure that the right development, of the highest quality, is delivered in the right places.

**1.8** The remaining sections of Local Plan Part 1 are structured as follows:

- Description of the borough (Spatial Portrait);
- Spatial Strategy;
- Thematic Planning Policies;
- Implementation and Monitoring; and
- Appendices.

**1.9** The thematic planning policies will be used to determine planning applications when they are submitted in the borough. Each of the policies has a specific role in delivering sustainable development, and where relevant, sets out the 'strategic' approach to the particular issue it addresses and the key points to be taken into consideration in decision-taking.

## The Role of the Local Plan

**1.10** Together with the London Plan (2021), the North London Waste Plan (2022) and the London Legacy Development Corporation (LLDC) Local Plan 2020-2036, the two parts of the Local Plan will form the Statutory Development Plan under section 38 of the 2004 Planning and Compulsory Purchase Act.

**1.11** The Local Plan will be supported by a series of Supplementary Planning Documents (SPDs), Neighbourhood Plans (as may be prepared) and other guidance including masterplans, design codes, planning briefs and area frameworks.

**1.12** Upon adoption, Local Plan Part 1 will replace, in whole, the Core Strategy (2012), Development Management Policies Document (2013), Walthamstow Town Centre Area Action Plan (2014) and Blackhorse Lane Area Action Plan (2015).

**1.13** The LLDC Local Plan remains the development plan for Temple Mills and Eton Manor for the purposes of decision making under s38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) ("the 2004 Act") until powers are transferred back to Waltham Forest.

**1.14** The Council is required to include a Policies Map in its Local Plan, which illustrates geographically the policies and proposals it contains. This is available alongside the Local Plan.

## National Policy Context

**1.15** All Local Plans are required to be consistent with the national policy set out within the National Planning Policy Framework (NPPF) (2021). The NPPF sets out the principles and objectives that are required to underpin approaches to plan-making and development management. Central to this is the “presumption in favour of sustainable development”, intended to ensure that sustainable development is pursued in a positive way. In general terms, this means that:

- Local Plans should positively seek to meet the development needs of their area and meet objectively assessed needs (such as housing growth) unless the harm of doing so would demonstrably conflict with the NPPF itself; and
- Decision-making, or "development management", should see that proposals that accord with development plans are approved without delay, and where plans are silent or out-of-date on an issue, permission should be granted for development.

**1.16** In accordance with the NPPF, the key strategic priorities that the Waltham Forest Local Plan must address include the following:

- The homes and jobs needed in the borough;
- Retail, leisure and other commercial development;
- Infrastructure provision for transport, telecommunications, waste management, water, flood risk and energy;
- Provision of health facilities, community and cultural infrastructure and other local facilities;
- Climate change mitigation and adaptation; and
- Conservation and enhancement of the natural, built and historic environment.

## The London Plan

**1.17** The London Plan (2021) is the statutory Spatial Development Strategy for Greater London prepared by the Mayor of London (“the Mayor”) in accordance with the Greater London Authority Act 1999 (as amended) (“the GLA Act”) and associated regulations.

**1.18** The Local Plan must be in ‘general conformity’ with the London Plan, and where appropriate, take account of Supplementary Planning Guidance (SPG) prepared by the Mayor, and any other strategies that sit alongside the London Plan.

## Neighbourhood Plans

**1.19** Neighbourhood Plans are optional plans prepared by local communities to set out the detailed planning policies and proposals for their specific area. The NPPF requires policies and proposals within any Neighbourhood Plans to be in general conformity with the "strategic policies" in the Local Plan. The Plan sets out strategic policies to address the strategic priorities of the borough, including an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for:

- a. housing (including affordable housing), employment, retail, leisure and other commercial development;

- b. infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- c. community facilities (such as health, education and cultural infrastructure); and
- d. conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.

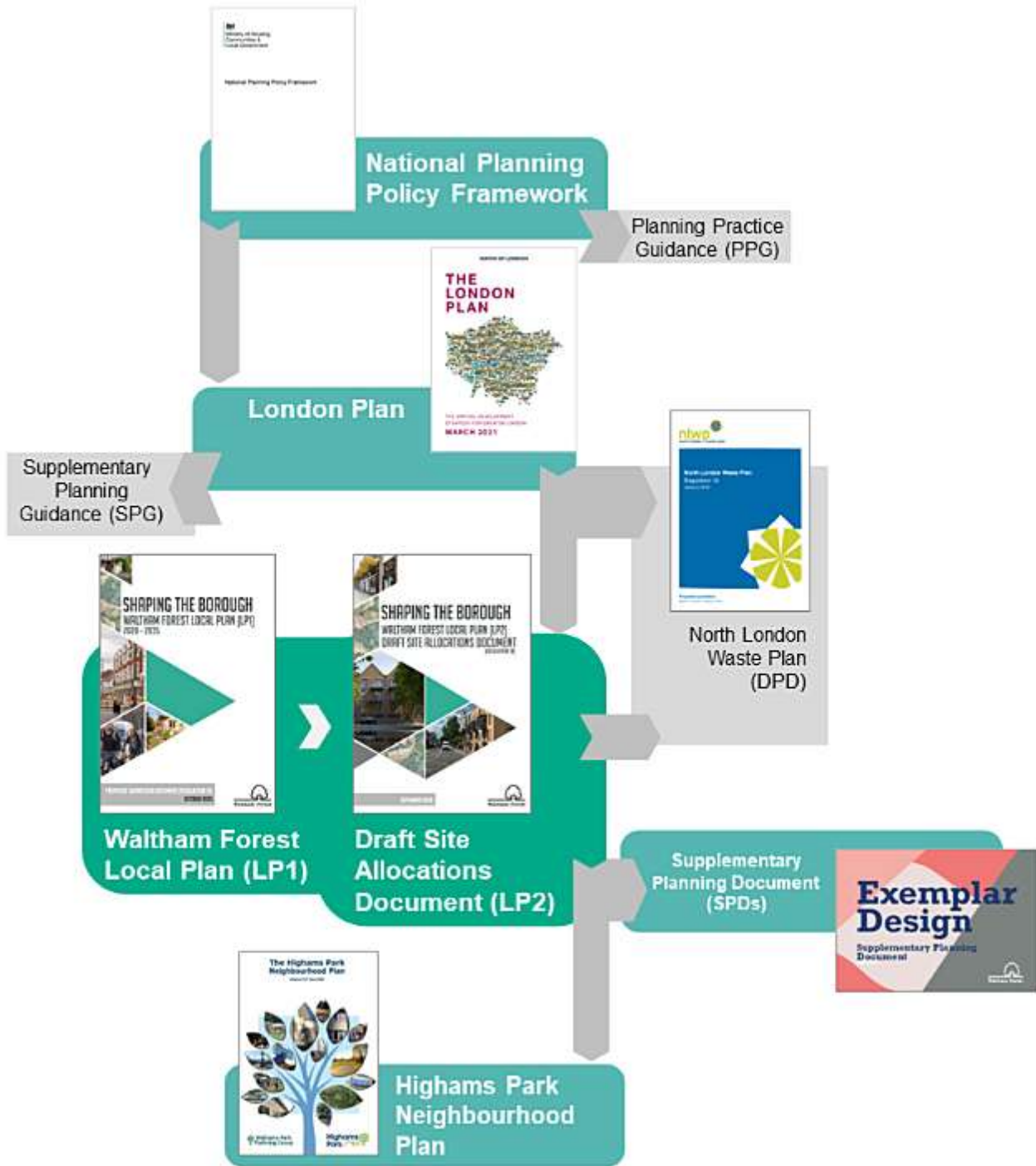


Figure 1.1 The planning policy framework

## Borough Portrait - Waltham Forest

**2.1** Waltham Forest is an outer borough in north east London. At 3,880 hectares, it is relatively small compared to many other outer London Boroughs, but it is very diverse in its make-up. It stretches from the Queen Elizabeth Olympic Park in the south to Epping Forest and Essex in the north, and is bookended by the River Lea and its associated reservoirs and marshes to the west and the Epping Forest to the east. Neighbouring London boroughs are Redbridge, Newham, Enfield, Hackney, and Haringey, while on its northern edge Waltham Forest also abuts Epping Forest District Council and the overarching Essex County Council.



Figure 2.1 Waltham Forest in a regional context

### Neighbourhoods and Communities

**2.2** Like much of London, Waltham Forest is a collection of neighbourhoods built up around busy high streets and stations, or historic villages. The borough's town centres offer many diverse retail, cultural and entertainment opportunities, and boast some strong civic architecture. Walthamstow is known for its street market, claimed to be the longest in Europe.

**2.3** Waltham Forest became a borough in 1965 as part of the formation of the Greater London Council, bringing together the parishes of Leyton, Walthamstow and Chingford. These roughly align with the geographic areas of the borough identified in this Local Plan:

- South (Lea Bridge, Low Hall, Leyton, South Leytonstone, Leytonstone, Whipps Cross and Bakers Arms);

- Central (Walthamstow Town Centre, Forest Road Corridor, Blackhorse Lane, and Wood Street); and
- North (North Chingford, South Chingford / Chingford Mount, Highams Park, Sewardstone Road and the North Circular Corridor).

**2.4** Whilst the south and central areas of the borough have a dense urban character and busy street life, the borough becomes more suburban to the north with lower density housing and more open green spaces that flow into the Green Belt, Epping Forest and out towards Essex.

## Population

**2.5** The residential population of the borough was 276,983 in 2019,<sup>(1)</sup> projected to rise to 328,082 by 2035 - a growth rate higher than the London average (1.7% annually compared to 1.3%). Waltham Forest is one of the most diverse areas in the country with 48 per cent of residents from a minority ethnic background. There is an established South Asian community who have been living in the borough since before the 1960s, drawn from Pakistan, India and Bangladesh, as well as many residents from eastern Europe (Poland, Hungary, Bulgaria, Lithuania and Romania), Turkey, Ireland, and the Caribbean (Jamaica). The south and centre of the borough are significantly more diverse than the north: roughly half the local population are from ethnic minority backgrounds, compared to a quarter in the north.

## Built Environment

**2.6** There is archaeological evidence of human settlement in Waltham Forest as far back as the Bronze Age, although for most of the area's history it was primarily rural, agricultural land. The arrival of the railway during the latter half of the 19th century provoked rapid urban expansion, resulting in much of the character found today.

**2.7** The south and central areas of the borough are characterised by Victorian and Edwardian town centres and terraced streets interspersed with post-war social housing estates, introduced following heavy bombing in the Second World War.

**2.8** The north of the borough was somewhat slower to develop, with activity primarily taking place during the 1910s-40s when many of its suburban semi-detached houses and terraces were built. Chingford and Highams Park have strong Edwardian town centres and some early examples of garden suburbs.

**2.9** There are more than 100 statutory listed buildings across the borough, including some striking examples of civic architecture such as Waltham Forest Town Hall (built in 1942) and Leytonstone Library (built in 1934). There are also more than 170 locally listed buildings, deemed to be of historic or architectural significance at a local level.

1 ONS Mid-Year population estimate, 2019

**2.10** There are 15 conservation areas in the borough, designated for their special architectural or historic interest. These are: Bakers Arms, Browning Road, Chingford Green, Chingford Station Road, Forest School, Leucha Road, Leyton Town Centre, Leytonstone, Lloyd Park, Orford Road, Ropers Field, Thornhill Road, Walthamstow St James, Walthamstow Village and Woodford Green.

## Transport

**2.11** The south and centre of the borough are connected to central London by the Victoria and Central Underground lines. These have historically attracted commuters seeking to make the borough their home and more recently brought in people attracted by expanding leisure and cultural opportunities, supporting an emerging night-time economy. Two Overground lines serve the north and east of the borough: the Liverpool Street to North Chingford line and the Gospel Oak to Barking line. The station at Lea Bridge was reopened in 2016, with further improvements planned, better connecting the borough to Stratford. Improvements to other local stations are also planned, including the delivery of a new station entrance and step free access at Leyton Underground Station - significantly increasing station capacity. In addition to this, the borough is seeking to deliver step-free access at all of its stations by 2040.

**2.12** A large swathe of the north west of the borough remains relatively poorly served by public transport with low Public Transport Accessibility Level (PTAL) ratings. In conjunction with the Local Plan, Waltham Forest Council will be working with Transport for London (TfL) on improving links and capacity in order to support the existing and anticipated growth in population.

**2.13** The borough is intersected by several major road arteries, including the A406 North Circular, the A12, the A503 Forest Road and the A104 Lea Bridge Road. While providing good connections across London, these roads can create barriers between parts of the borough and contribute to localised poor air quality.

**2.14** The award-winning £30 million Enjoy Waltham Forest (Mini Holland) network of dedicated cycle lanes has improved connectivity between neighbourhood centres and reinforced the borough's commitment to reducing car use and promoting active travel. Further improvements to pedestrian and cycle links, creating new and improved connections to employment, education and leisure opportunities across the borough will allow an even greater proportion of trips to be made by active modes of travel, and further improve local air quality.

## Culture

**2.15** Waltham Forest became the Mayor of London's first-ever London Borough of Culture in 2019. It is home to an abundance of culture, creativity, heritage and enterprise – including the award-winning Grade II\* listed William Morris Gallery, Grade II listed Town Hall and Fellowship Square and the internationally recognised nature reserve, Walthamstow Wetlands – along with a wide range of ambitious arts, events, and experiences delivered by our thriving creative sector and communities across the borough.



**2.16** Culture is firmly embedded in the borough's regeneration and growth plans, including significant investment to restore the former Granada cinema to create Soho Theatre Walthamstow, a 1000 seat comedy venue, due to open in 2024. Levelling Up Funding has been awarded to develop Walthamstow Town Centre and the surrounding area as a cultural destination, with public realm improvements, the reimagining of Vestry House Museum, and enhancements to the famous mile long street market. Further north in the borough, plans are also in development to bring back to life The Regal cinema in Highams Park and to deliver town centre upgrades in Chingford Mount.

**2.17** The recently launched 'Blackhorse Collective' Creative Enterprise Zone (CEZ) has brought a focus to the range of creative businesses and breweries in the Blackhorse Lane area, increasing their profile and generating further growth. Over the Plan Period, there will be an increased emphasis on the provision of suitable spaces to enable local entrepreneurs and creative organisations to remain and grow their businesses in the borough, for example at Coronation Square in Leyton and as part of longer-term plans for the redevelopment of the New Spitalfields Market site, which will build on the success of and connect with Here East in the Queen Elizabeth Olympic Park. The Council has also established a Creative Jobs Academy, working closely with local enterprises and training providers to up-skill local people, to enable them to benefit from the increased local employment opportunities in the creative sector.

## Environment

**2.18** Waltham Forest is one of London's greenest boroughs, with Metropolitan Green Belt and Metropolitan Open Land (MOL) accounting for 27% of its area. Epping Forest is a deeply rooted part of the borough's identity, particularly in the north. The River Lea, River Ching, the William Girling and Banbury reservoirs and the extensive Walthamstow Wetlands give the borough a rich array of blue spaces. However the river and reservoirs can isolate adjacent areas, and will benefit from careful integration into the Local Plan's spatial strategy. Land within the Lea Valley is subject to flood risk. Many of these green and blue spaces are conservation sites and designated Sites of Special Scientific Interest supporting biodiversity within the borough. Further detail on these can be found in the accompanying Green Belt and Metropolitan Open Land Study and the Green and Blue Infrastructure Strategy. Waltham Forest Council declared a Full Climate Emergency in April 2019 and launched a Climate Action Plan in November 2022.

## Economy

**2.19** Industry and commerce in the borough are characterised by small and medium-sized enterprises (SMEs). In addition, creative and cultural businesses and food producers such as microbreweries have flourished over the past 15 years, with a high concentration in the Blackhorse Lane CEZ. Although employment rates for 16-64 age groups is broadly comparable with both London and national averages, the borough has pockets of deprivation, especially where areas are isolated due to poor transport connectivity.

## Vision and Strategic Objectives

**3.1** The Local Plan sets out the strategic priorities for development and sustainable growth of the borough over 15 years. There are seven golden threads that shape the Local Plan. These are as follows, and are all considered to have equal value.



Figure 3.1 The 7 golden threads

### Seven Golden Threads

- Increasing housing and affordable 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.
- Conserving, enhancing and celebrating the locally distinctive character and heritage of the borough.
- Protecting and enhancing the natural environment.
- Ensuring land optimisation and driving investment.

**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 our strengths as part of the capital and its outer fringe, and the identities of our eight historic town centres and the communities that have grown up around them, by 2035 the borough will be defined by a network of enterprising, culturally rich, well designed, sustainable neighbourhoods. It will attract people from across London and further afield to enjoy its cultural, creative and heritage attractions, green spaces and recreational opportunities.

**Liveable Waltham Forest**

Waltham Forest's vibrant network of distinctive and thriving town centres will become cultural community hubs, bringing the city to the suburbs and supporting creative, healthy and active lifestyles. A new vision of urban living will be embedded, whereby people can easily reach most, if not all, of the facilities, experiences and activities they need on a daily basis within a fifteen minute walk, wheel, or cycle from home. Building on the success of Enjoy Waltham Forest, the borough's extensive network of green spaces including Epping Forest, Walthamstow Wetlands, Green Flag Award parks, neighbourhood and pocket parks and urban spaces will connect town centres to new liveable neighbourhoods via 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 deliver a new model for 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 all 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-Stansed-Cambridge) to grow its own creative and cultural economy. Building on its growing and strongest sectors, Waltham Forest will become 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 full 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, Fellowship Square and, following its opening in 2024, Soho Theatre), its places, cultural offer and green and blue assets - including access to Epping Forest, the Lee Valley Regional Park, reservoirs and marshland - will be enhanced for residents and all to enjoy.

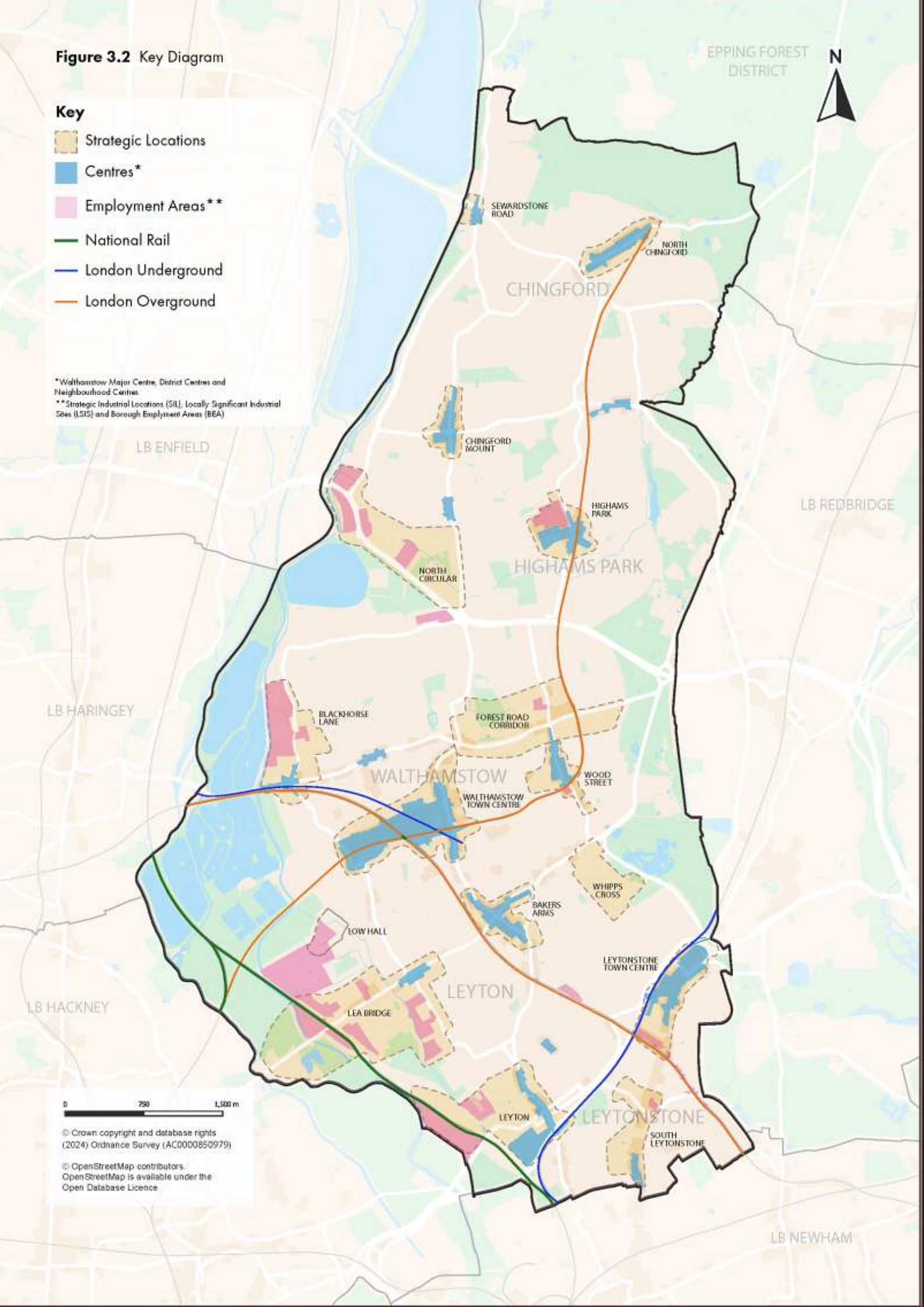
A key ambition of this Plan is to promote the borough as a vibrant place to live and visit. The Council aims to deliver a diverse and inclusive 24/7 economy in Waltham Forest's town centres (where appropriate) and culture venues, building a cultural legacy celebrating the creativity of the borough's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

Figure 3.2 Key Diagram

Key

- Strategic Locations
- Centres\*
- Employment Areas\*\*
- National Rail
- London Underground
- London Overground

\*Walthamstow Major Centre, District Centres and Neighbourhood Centres  
\*\*Strategic Industrial Locations (SIL), Locally Significant Industrial Sites (LSIS) and Borough Employment Areas (BEA)



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## Strategic Objectives

These strategic objectives will deliver the vision for Waltham Forest 2035. They will:

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 indigenous growth and attracting inward investment.
3. Improve life chances by improving job opportunities, upskilling residents and providing access to new skills, training and apprenticeship opportunities.
4. Support Waltham Forest's thriving, safe and attractive town centres by maintaining their distinctive roles and making them accessible to all.
5. Ensure that residents are able to meet their day to day needs within a 15 minute walk, wheel or cycle of their home. Conserve and enhance the borough's network of culturally diverse, inclusive and sustainable neighbourhoods and celebrate their locally distinctive character and heritage.
6. 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.
7. 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.
8. Improve the health and well-being of all who live, study and work in Waltham Forest.
9. Improve active and sustainable transport choices across the borough and beyond, building on the success of the Enjoy Waltham Forest programme and encouraging wider, fully integrated walking and cycling routes.
10. Promote exemplary standards of design in placemaking and the highest quality of development, whilst ensuring locally distinctive character and heritage is celebrated, protected and enhanced.
11. Develop a multi-functional network of green and blue infrastructure to deliver benefits for all including, where appropriate, increased public access.
12. Protect, restore and enhance the borough's natural environment to sustain biodiversity, habitats and species of conservation importance.
13. Conserve and enhance the borough's historic environment, distinctive character and heritage for future generations to enjoy.
14. Work with partners to protect and enhance the adjoining areas of regional, national and international natural importance in Epping Forest and the Lee Valley Regional Park.
15. Build Waltham Forest's resilience through addressing sustainability, efficient waste management and the effects of climate change at all stages in the development process.
16. Ensure that engagement in plan-making is effective and actively involves residents, local organisations (such as community groups), businesses, infrastructure providers and statutory consultees.



## Waltham Forest's Spatial and Growth Strategy

### Introduction

**4.1** Delivering the vision and spatial objectives as set out in the previous section will require a policy framework designed to deliver sustainable growth. This chapter sets out the Council's overall approach in promoting sustainable development and growth. A robust spatial strategy is required to deliver and manage growth to ensure that Waltham Forest continues to be recognised as a desirable place in which to live, enjoy work and do business. This section outlines the planned scale of growth and the locations in which good growth will be encouraged and enabled. It also sets out the overarching policies necessary to deliver sustainable good growth.

**4.2** This plan covers the period 2020-2035. During this period, many parts of the borough will experience physical changes to the built environment as a result of new development including significant growth in housing, social infrastructure and employment provision. The built environment will also need to withstand and adapt to the effects of climate change and the need to provide for low carbon, low emission living and transport. Furthermore the effects of growth on protected areas such as Special Protection Areas (SPA), Special Areas of Conservation (SAC) and Ramsar sites must be considered, ensuring that any significant impact is avoided or necessary mitigation measures employed. Delivering high quality, sustainable and resilient places through good design and effective masterplanning will be essential to the achievement of the Plan vision.

**4.3** The spatial strategy, set out in this chapter is driven by the overall vision, coupled with the Council's ambitions for growth. It sets out the locational priorities for development up to 2035. The strategy aims to ensure that growth is transformative in parts of the borough, but also sustainably balanced not only reflecting the character areas of the borough but also providing sufficient supporting social infrastructure, building on the borough's assets and opportunities.

**4.4** Maintaining and enhancing the borough's distinctive qualities and delivering high quality, sustainable, resilient places is vital to ensure the future prosperity of Waltham Forest. The spatial strategy, set out in the Plan, recognises existing development commitments and promotes a sustainable pattern of growth. It is supported by a framework for delivery set out in subsequent chapters of this document intended to promote and secure growth through the delivery of housing and employment in the most sustainable locations, but also delivering the required physical, social and community infrastructure.



**Policy 1****Presumption in Favour of Sustainable Development**

At the heart of the Local Plan Strategy is a desire to deliver sustainable growth; growth that is not for its own sake, but growth that brings benefits for all of Waltham Forest's new as well as existing communities.

When considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. Development proposals will be informed and shaped by the suite of policies that have been developed to ensure that development and growth are positive, work to the benefit of residents and businesses, and enhance the existing physical environment. The Council will achieve this by working proactively with applicants to jointly find solutions which mean that proposals can be approved wherever possible without delay, while at the same time securing development that improves the economic, social and environmental conditions in the borough.

Planning permission will be granted where applications accord with the policies in this Plan (and, where relevant, with policies in the London Plan, North London Waste Plan, LLDC Local Plan, adopted Neighbourhood Plans and Supplementary Planning Documents) when taken as a whole, unless other material considerations indicate otherwise.

**4.5** At the heart of the National Planning Policy Framework (NPPF) is a presumption in favour of sustainable development, which underpins both plan making and decision-taking. This Local Plan acknowledges this important national policy requirement. The planning system must contribute to the achievement of sustainable development. For plan-making this means that plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change. For decision-taking this means approving development proposals that accord with an up-to-date development plans without delay; or where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless there are clear reasons as set out in the NPPF for refusing development.

**Need for Development**

**4.6** National and regional planning policy requires Local Plans to go as far as possible in meeting identified housing need, so long as all other policy objectives are achieved.

## Policy 2

### Scale of Growth

Over the period 2023-2035, the Council will maximise opportunities for economic growth by promoting significant levels of housing and employment development involving minimum net increases of:

- A. 27,000 additional homes; and
- B. 52,000sqm employment floorspace.

**4.7** Since the start of the Plan Period in 2020, there have been 3,705 new homes (net) delivered against the requirement of 3,792. The requirement for these three years is based on the London Plan (2021) target for the borough of 1,264 new homes per year. From 2023 onwards, this Plan sets housing requirements for the borough (Policy 12 'Increasing Housing Supply') informed by detailed evidence of developable and deliverable site capacity and in response to the NPPF's (2021) requirement to go as far as possible to meet our Objectively Assessed Need for new homes. The Waltham Forest Strategic Housing Market Assessment shows the borough's housing need to be 1,810 dwellings per annum over the period 2014-2039.

Financial Year	Housing Completions	Housing requirement
2020-21	1,497	1,264
2021-22	987	1,264
2022-23	1,221	1,264

**Table 4.1 Housing completions 2020-23**

**4.8** These key requirements must be planned for during the Plan Period and represents the most significant growth in a generation. The Council intends that the requirements for growth arising in Waltham Forest should be met within the borough. Policy 4 'Location of Growth' sets out how the Council intends to sustainably deliver the growth targets set out above. Neighbourhood Plans can allocate additional growth to meet local needs at a scale which does not undermine the overall distribution strategy.

**4.9** This Plan has been produced at a time of uncertainty arising from the Coronavirus pandemic. The evidence base supporting this plan was produced before the pandemic but the full effect of the pandemic is presently unknown and could take some time for new evidence to be become established and then modelled in future projections. In the circumstances, the Plan factors in the following assumptions:

- The trend towards rising demand for housing will continue. Such demand is from population increase and housing shortages in London generally and in the borough specifically;

- A reduction in commuting patterns to workplaces outside the borough and the trend towards workplace mobility will reinvigorate a demand for flexible work spaces and local hubs;
- There will be an increase in daytime working population in the borough arising from a reduction in commuting patterns and as more agile working strategies are adopted.

**4.10** In planning for the proposed level of growth, the Council recognises that the long term forecasts as stated above may be susceptible to change. As projections are subject to uncertainty, forecasts may be subject to change to reflect emerging circumstances as and when new information becomes available. If, as a result of subsequent monitoring, growth forecasts need to be amended or policies cannot achieve the intended outcomes, this would trigger a review of this Plan. Further information on monitoring and implementation is included in 'Delivering the Plan'.

### Policy 3

#### Infrastructure for Growth

The Council will require development proposals to make viable provision for infrastructure that is necessary to accommodate additional demands arising from growth by:

- Working with infrastructure delivery bodies and agencies, landowners and developers to ensure that the growth outlined in this Local Plan is supported by necessary infrastructure as set out in the Infrastructure Delivery Plan. In particular, the Council will prioritise the timely delivery and success of the following key infrastructure projects including:
  - Redevelopment of Whipps Cross Hospital;
  - Ruckholt Road New Rail Station;
  - Reopening of the Meridian Line;
  - Walthamstow Central Station Transport Interchange; and
  - Leyton Underground Station Improvements;
- Ensuring the provision of expanded schools (including bulge classes) where there is capacity on existing sites to accommodate the pupils arising from new development, and new provision in identified 'areas of need' where population change and growth requires its provision ('Social and Community Infrastructure');
- Ensuring the provision of GP Practices and other health care facilities in central locations within walking distance to the residential catchments areas they are expected to serve ('Social and Community Infrastructure');
- Working with the telecommunications industry to maximise access to super-fast broadband, wireless hotspots and improved mobile signals for all residents and businesses. Where a fibre connection cannot currently be provided, infrastructure within the site should be designed to allow for fibre provision in the future ('Active Travel, Transport and Digital Infrastructure');

- E. Requiring robust evidence to be provided, where developers consider that viability issues will impact upon the delivery of required infrastructure and/or mitigation measures. This evidence will be used to determine whether an appropriate and acceptable level of contribution and/or mitigation can be secured;
- F. Requiring developers to provide, finance and/or contribute towards infrastructure provision which is fairly and reasonably related in scale and kind to the development, through Planning Obligations and the Community Infrastructure Levy (or any future replacement) in order to:
  - ensure appropriate provision of facilities and infrastructure for new residents;
  - mitigate any adverse impacts where appropriate;
  - avoid placing unreasonable additional burdens on the existing community or existing infrastructure; and
  - address cumulative impacts that might arise across multiple developments;
- G. Ensuring essential new infrastructure to support new development is operational no later than the completion of development or during the phase in which it is needed, whichever is earliest, unless otherwise agreed with relevant providers; and
- H. Refusing planning permission where appropriate agreements or processes ensuring criteria (F) and (G) above are not in place or cannot be met.

**4.11** A key objective of this Plan is to identify the necessary infrastructure projects required to support good growth. This Plan includes policies to secure the provision of the required levels of social and physical infrastructure and the timely delivery of these requirements particularly in locations where they will contribute positively to the well-being and social cohesion of local communities. In providing infrastructure to support development, close partnership working will be maintained with key agencies, relevant infrastructure providers and the development industry. There are a variety of organisations and bodies, including the Council, that are responsible for delivery. Some of the key public bodies include the Greater London Authority (GLA), Transport for London (TfL), Network Rail and train operators, Clinical Commissioning Group, National Health Service (NHS), Thames Water, National Grid, Electricity and Gas Companies, Metropolitan Police.

**4.12** Infrastructure includes a wide range of facilities and services including schools, medical facilities, community facilities, open space and public realm, roads, railways, cycle paths and flood defenses. New growth can place extra pressure on existing infrastructure and create a need for new services and facilities. With regards to public transport infrastructure provision, it will be important to ensure the integration of new development with future requirements for bus and rail infrastructure and services. This will include demand management measures as well as safeguarding existing infrastructure. Most needs generated by new development will necessitate improvements to existing infrastructure rather than completely new provision. The key strategic infrastructure projects which are expected to be delivered during the Plan Period are those listed here, but are under regular review. A comprehensive list of projects is included in the Infrastructure Delivery Plan.

**4.13** This policy seeks to ensure the necessary infrastructure or appropriate mitigation is provided. The Council is preparing a Site Allocations Development Plan Documents (DPD) to complement this plan (Local Plan Part 2 - Site Allocations). Site-specific opportunities will be taken to support and ensure the timely delivery of infrastructure. Cumulatively, a number of developments (on small and large sites) can create additional demands and burdens on existing infrastructure, which may require suitable mitigation measures to be implemented. Accordingly, this policy seeks to set out the Council expectations in considering infrastructure requirements.

**4.14** The policy draws attention to the IDP, providing in greater detail the anticipated infrastructure that we required during the Plan Period. This is a live document that will be reviewed throughout the Plan Period to ensure that decisions on infrastructure are made in light of up-to-date information. This provides flexibility as the role and nature of infrastructure providers will change over the period to 2035.

**4.15** In ensuring the timely delivery of infrastructure, the provision of infrastructure will need to be linked directly to the phasing of development. To safeguard this, the Council intends to place formal arrangements/agreements with relevant bodies to ensure that all funding sources, in addition to developer contributions, are explored. Developer contributions will continue to be an important mechanism to address any shortfalls in social and physical infrastructure that arise as a direct result of new developments subject to viability considerations. The full range of infrastructure requirements, projects and programmes, phasing and funding arrangements are included in the IDP.

**4.16** The Council accepts the challenges arising from market uncertainties. Accordingly, this policy also sets out the Council's expectations where viability becomes an issue. As a general approach, developers will be expected to provide and pay for an independent assessment. Such evidence will be used to support decision making. Further information on this requirement is also included in 'Delivering the Plan'.

## Location and Management of Growth

**4.17** This section sets out the Council's approach to spatial distribution of growth and the strategic policies that will apply in ensuring good management of growth. The distribution of growth to the identified areas as outlined below takes into account national planning policy principles set out in the NPPF. Local Plans are required to take account of the varied roles and character of different areas and actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in sustainable locations.

### Policy 4

#### Location of Growth

A sustainable approach to accommodating growth will be achieved by focusing new development, regeneration and investment activities primarily in Strategic Locations and other Site Opportunity Locations (Figure 4.1). These will be the primary locations for growth involving the following minimum levels of new homes and jobs with supporting infrastructure.

- A. **South Waltham Forest:** A minimum of 13,340 new homes and 3,250 new jobs in the Strategic Locations of Lea Bridge, Low Hall, Leyton, South Leytonstone, Leytonstone Town Centre, Whipps Cross and Bakers Arms;
- B. **Central Waltham Forest:** A minimum of 6,810 new homes and 1,600 jobs in the Strategic Locations of Blackhorse Lane, Walthamstow Town Centre, Forest Road Corridor and Wood Street;
- C. **North Waltham Forest:** A minimum of 1,710 new homes and 1,940 jobs in the Strategic Locations of North Chingford, Sewardstone Road, Chingford Mount, Highams Park and the North Circular Corridor; and
- D. **Elsewhere in Borough:** A minimum of 5,150 new homes outside the identified Strategic Locations.

**4.18** This policy identifies the broad geographical areas where consolidated regeneration efforts will be applied to deliver growth. These are referred to as Strategic Locations. In these areas, new development will be expected to provide a well balanced mix of economic, social and environmental benefits to support the development of a network of well-connected, sustainable, high quality, attractive, locally distinctive and healthy places. The above policy, together with other policies of this Plan, steers most new development to those places that offer the best access to services and facilities and public transport (both now and for the foreseeable future). This can help reduce the need to travel, as well as making best use of existing infrastructure and previously developed land in built-up areas.

**4.19** This strategy directs most forms of new development and growth to the more sustainable locations, particularly South Waltham Forest, which represents the largest and most transformative location for growth in the borough over the Plan Period. Other growth locations will also have an important role in creating a network of well connected, sustainable

and locally distinctive and healthy places. They will act as the primary locations for growth and investment in homes and jobs with supporting infrastructure. These locations have been identified to optimise connectivity and access to services and jobs (see Key Diagram, Figure 3.2).

**4.20** Site-specific proposals are set out in Local Plan Part 2 - Site Allocations. Other sites will be included in the Brownfield Land Register. Brownfield land registers provide information on sites that local authorities consider to be suitable for residential and mixed-use developments.<sup>(2)</sup>

### Strategic Locations

**4.21** This Plan identifies 17 Strategic Locations. These are areas where substantial growth is expected to occur on larger sites or clusters of smaller sites to deliver the significant growth in housing, employment and infrastructure provision. Many of these areas encompass the designated centres, including Walthamstow Major Town Centre, District Centres and Neighbourhood Centres and therefore represent a functional area within which a coordinated approach to redevelopment may be necessary to manage the cumulative impacts of growth in the area as whole and in the neighbouring areas.

**4.22** The distribution of growth in the identified Strategic Locations builds on existing committed and pipeline development. Opportunities in these areas will allow new development in a range of sites (small, medium and large) spread throughout the borough. A broader range of sites will provide greater choice in the provision of different housing and employment types.

**4.23** Focusing growth in the identified Strategic Locations will reduce the pressure for substantial incremental development in predominately established residential and more sensitive areas. By promoting synergy in clusters of sites/areas, more sustainable places and growth locations will be created. In these areas, new homes and jobs will be delivered close to community facilities and public transport and there will be enhanced opportunities for developing a unique sense of community and place. Distributing significant growth to these areas will bring the opportunity to transform places and communities, delivering renewal and strategic scale regeneration.

**4.24** The identification of the Strategic Locations has been derived and informed by the outcome of previous consultation and the Local Plan evidence base. At the Issues and Options stage (Direction of Travel, 2017), alternative locations for accommodating growth were presented. There was strong support for the combined approach involving a dispersed pattern of growth in identified hubs, town centres and opportunity locations. Sites at these locations have been tested for their potential capacity through the Growth Capacity Study (2018) and alongside the large scale regeneration opportunity presented in the south of the borough, this forms the basis and rationale for distributing growth.

2 The Town and Country Planning (Brownfield Land Register) Regulations 2017 and the Town and Country Planning (Permission in Principle) Order 2017 require local planning authorities to prepare and maintain this register. Sites should be at least 0.25 hectares or capable of supporting at least 5 dwellings and must be suitable, available and achievable. The register is published annually.

**4.25** There is, however, still some development which is expected to take place outside of the identified Strategic Locations within North, Central or South Waltham Forest. In Policy 4 'Location of Growth', this is referred to as "elsewhere in the Borough".

### Site Opportunity Locations

**4.26** This Plan identifies a number of Site Opportunity Locations (see Figure 4.1). These sites are spread throughout the borough. In this document, they represent indicative locations from which sites would be selected to support the key growth aspirations of the Plan. Further guidance on these sites, those selected as 'strategic' or 'key sites' will be included in the Site Allocations DPD, which represents Part 2 of the Council's Local Plan. Local Plan Part 2 - Site Allocations includes a site selection methodology. Redevelopment on these sites will contribute to overall housing and employment provision with supporting infrastructure.

## Policy 5

### Management of Growth

In planning for growth, the Council will seek to achieve an appropriate balance between physical, social and economic development and environmental protection. Growth will be distributed and managed by:

- A. Directing and consolidating any new retail and other town centres uses including leisure, offices and new social infrastructure facilities to the designated centres and maximising residential opportunities in these centres through mixed use development. ('Distinctive Town Centres and High Streets');
- B. Protecting, promoting and managing designated employment areas to secure more jobs for local people ('Building a Resilient and Creative Economy');
- C. Protecting designated sites, areas and green space (Green Belt, Metropolitan Open Land, Special Protection Areas, Special Areas of Conservation and Sites of Special Scientific Interest; including Epping Forest SAC and SSSI and Lee Valley Regional Park SPA and Ramsar) and conserving biodiversity including wildlife. ('Protecting and Enhancing the Environment');
- D. Conserving the heritage significance of Conservation Areas, Listed Buildings, Archaeological Priority Areas and other heritage assets ('Conserving and Enhancing our Heritage'). Heritage assets in these locations will be secured and supported with investment to embed the rich cultural and heritage opportunities of the borough;
- E. Making effective use of previously developed land, except where land is of high environmental value or purposely safeguarded or protected for particular uses as identified on the Policies Map. In considering suitable sites for growth proposals, the redevelopment of underused and vacant land, in particular sites identified in the Local Plan Part 2 - Site Allocations and included on the Brownfield Land Register, will be prioritised;
- F. Promoting good design and high quality placemaking ('Creating High Quality Places'), by ensuring that development is planned and implemented in a coordinated way, guided by Supplementary Planning Documents (SPDs), Masterplans, Planning Briefs, Design



Codes and other relevant Design Guidance where appropriate. Pending the preparation and adoption of masterplan SPDs for the identified Strategic Locations, proposals for major development coming forward will be considered on the basis of good growth principles and policies included in this plan and the London Plan;

- G. Supporting the preparation of broad concept plans/planning framework guidance by stakeholder groups or developers for small areas or clusters of sites. The approval process for such plans will be mainly via Supplementary Planning Document (SPD) legislation; and
- H. Applying a comprehensive set of actions to implement the Plan strategy including:
  - i. ensuring that infrastructure required to support growth is phased and viably funded in line with the Infrastructure Delivery Plan (IDP), which will be prepared and updated on a regular basis;
  - ii. resisting any proposed development that will prejudice the future development of a neighbouring site and/or prohibit the comprehensive development of a larger site;
  - iii. working with duty to co-operate partners, stakeholders and the development industry to maximise development opportunities; and
  - iv. where necessary, using compulsory purchase powers to tackle land issues which inhibit regeneration and the proper planning of the area.

## Area-Based SPDs and Masterplans

**4.27** Within Strategic Locations generally, the Council intends to prepare area-based SPDs and/or masterplans to guide and co-ordinate development. The purpose of a masterplan is to ensure that sites come forward in a coherent manner and contribute to the overall vision and objectives for the area, as developed through the consultation process. When prepared and adopted, such guidance will be given weight as a material consideration in determining planning applications.

**4.28** Masterplans have an important role in providing guidance to developers, landowners and residents. They will be based upon an understanding of the place or location and informed by available evidence including the local context, heritage designations and other development constraints. They will set out the intended implementation and phasing of development, identifying responsibilities for delivery and sources of funding. They will also provide a clear focus for partners, including businesses, community services, community groups and public transport providers to work together to bring investment into the area.

**4.29** Prior to the preparation of masterplan SPDs, it is expected that some sites may come forward for redevelopment. This policy therefore welcomes the establishment of development partnerships where necessary in bringing forward such sites for redevelopment through an agreed design concept plan, phasing strategy or masterplan.

**4.30** The role of planning briefs will be particularly important in bridging the gap between the development plan and a planning application. They will be used to promote the development of nearby sites, address a particular site constraint or opportunity and give further guidance on the interpretation of the development plan policies and principles set out in the Plan.

**4.31** The design policies of this Plan, along with a range of thematic policies and principles will be used to inform the preparation of masterplan SPDs and planning briefs. Through consultation work on their preparation, local communities will have further opportunities to help shape proposals for local areas and neighbourhoods.

## Policies Map

**4.32** The Policies Map shows the areas of the borough where the area-based policies of the Plan would apply.

**4.33** The borough is heavily built up with large areas predominately in established residential use. Outside the established protected areas such as Green Belt/MOL, it is considered that additional housing and employment needs could be accommodated as part of mixed-use development without purposely allocating land for specific uses.

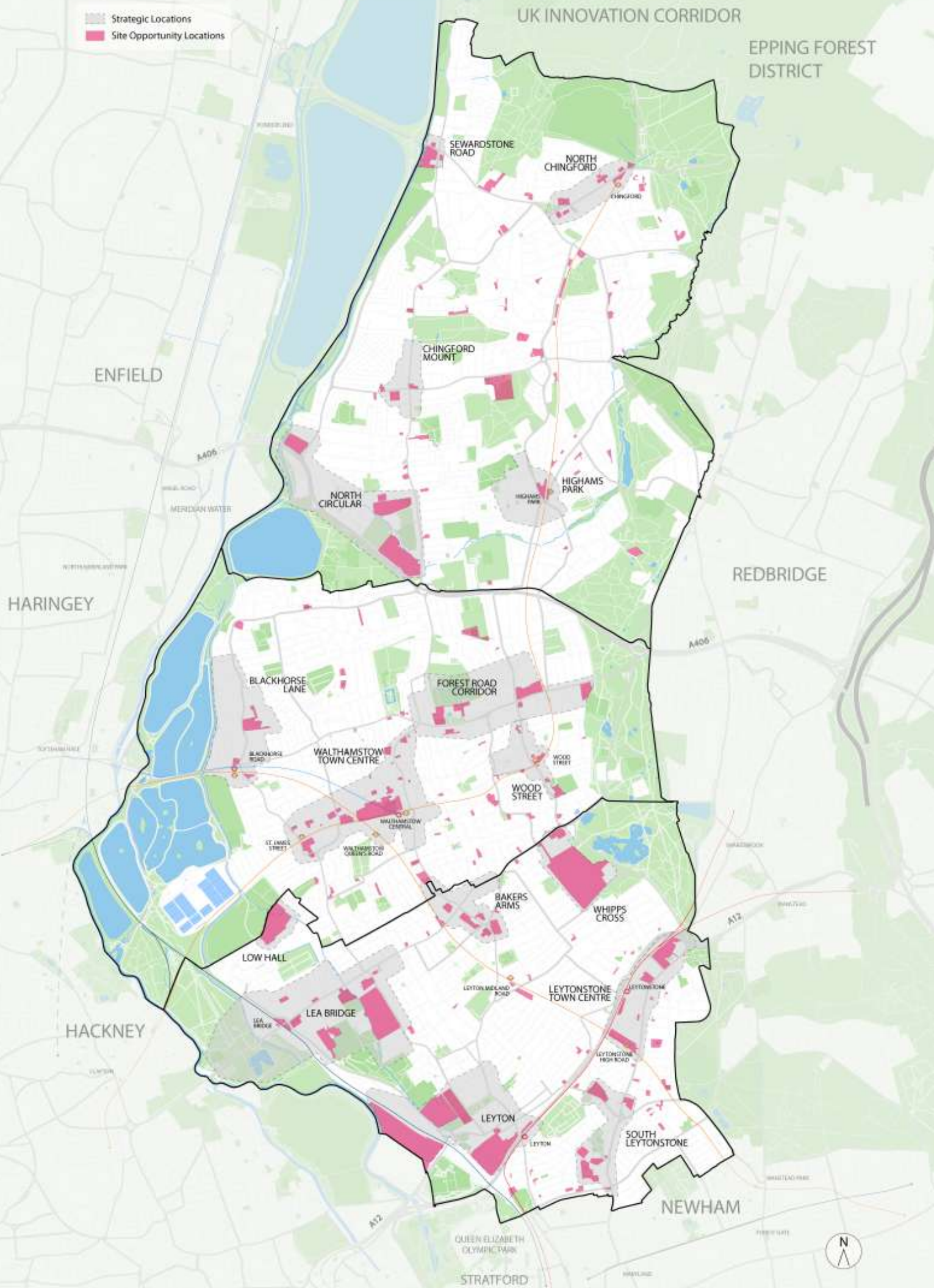
## Brownfield Land Register

**4.34** To guide decision making, the Council intends to make effective use of the Brownfield Land Register as provided for by the NPPF and Regulation 3 of the Town and Country Planning (Brownfield Land Register) Regulations 2017. This Register identifies the brownfield sites in the borough that the Council considers suitable for housing and other uses. Where

necessary, the Council will apply Part 2 of the Register (Permission In Principle) on those sites more likely to benefit from this mechanism. This should provide clear signals to potential developers about opportunities, and certainty to local communities about the intended future of those sites.

**4.35** Sites selected for the purposes of the Brownfield Register will come from evidence base studies including the GLA Strategic Housing Land Availability Assessment, Growth Capacity Study and 'Call for Sites' exercises the Council will undertake from time to time. The current Growth Capacity Study (2018) provides a high-level assessment of potential sites. This is an indicative list of possible sites, which will require further monitoring and testing for suitability, availability and achievability for future housing, social infrastructure and employment developments.

**Figure 4.1** Strategic Locations and Site Opportunity Locations



## Good Growth and Management of Growth

**4.36** The London Plan seeks to promote good growth in London by building strong inclusive communities, making the best use of land, creating a healthy city, building more homes and affordable housing to address the housing crisis, growing a good economy and increasing efficiency and climate change resilience. The Council supports the London Plan approach. This Plan seeks to ensure that Waltham Forest's future growth is pursued and planned in the most sustainable way in accordance with these good growth principles. This section sets out the overarching policy principles enshrined in the Plan. This includes maintaining a good balance between economic, social and environmental objectives, creating livable attractive places for people to live, study, work and visit, as well as capturing climate change objectives, such as reducing the borough's carbon footprint and creating resilient and adaptive environments in response to the "Climate Emergency" for the benefit of all Waltham Forest residents.

### Policy 6

#### Ensuring Good Growth

In ensuring good growth, development proposals will be expected to satisfy the following requirements, unless demonstrably impossible to do so:

- A. Make efficient use of land through mixed-use development and intensification (Policy 7 'Encouraging Mixed Use Development' and Policy 8 'Character-Led Intensification');
- B. Contribute to improving and enabling healthier lifestyles ('Promoting Health and Well-Being' and Policy 61 'Active Travel');
- C. Provide a broad range of housing choice by size and tenure including affordable housing and cater for people with special housing needs ('Decent Homes for Everyone');
- D. Contribute to providing for a wide range of local employment opportunities that offer a choice of jobs in different sectors of the economy ('Building a Resilient and Creative Economy');
- E. Support the creation of successful neighbourhood communities (15 Minute Neighbourhoods, where every resident is able to meet most or all of their needs within a short walk, wheel or bike ride from home) and the provision of adequate social and physical infrastructure ('Social and Community Infrastructure', Policy 61 'Active Travel', and Policy 62 'Public Transport');
- F. Incorporate high quality design solutions and contribute positively to the quality of the physical environment ('Creating High Quality Places');
- G. Ensure that new development proposals (including the alteration and refurbishment of existing buildings, extensions and change of use of buildings) are inclusively designed and usable by all to promote equality of opportunity ('Creating High Quality Places');
- H. Contribute to the response to climate change, through mitigation and adaptation, the use of sustainable building materials, low carbon heating and energy efficiency, low carbon transport, electrical vehicles and active travel ('Addressing the Climate Emergency' and 'Active Travel, Transport and Digital Infrastructure');

- I. Protect and enhance existing green and blue infrastructure, including open space and leisure facilities, biodiversity and nature conservation ('Protecting and Enhancing the Environment');
- J. Create safe environments, which incorporate appropriate design solutions and crime prevention measures that assist in reducing crime, the fear of crime and anti-social behaviour ('Creating High Quality Places'); and
- K. Protect heritage assets including conservation areas and listed buildings ('Conserving and Enhancing our Heritage').

**4.37** This Plan seeks to deliver a sustainable balance of development through the overarching policy principles set out above. These are covered in detailed policies in other chapters of the Plan. Land is a valuable resource. In providing for future needs, it is necessary to make the best use of land as efficiently as possible. Accordingly, this policy seeks to ensure the reuse of previously developed land and buildings. The way people interact with the physical environment (built and natural) also has a significant impact on health and well-being. Providing a range of housing types and employment spaces is also necessary to achieve the overall objectives of the Plan.

**4.38** Other important policy principles enshrined in the Plan seek to encourage the highest sustainability standards in development. This should help generate wider benefits to support climate change objectives regarding carbon reduction, energy efficiency, low carbon heating, and the use of renewable resources. The built environment will need to be resilient to the potential impacts of climate change.

## Mixed Use Development and Intensification

**4.39** In accommodating growth, this Plan supports the principle of mixed-use development. Ensuring the appropriate mix of uses on individual sites and across areas of the borough can be beneficial in a number of ways, including reducing the need to travel between homes, jobs and services. The appropriate mix of uses ensures that a range of activities are provided throughout the day, thus increasing community safety and security, and contributing to the creation of areas that are diverse, distinctive and successful. A mixed use approach to development also allows for the most efficient use of land, with other uses developed above those that need direct ground floor access or street-level frontage, such as shops. As such, it provides more opportunities for the development of housing and employment floorspace.

**4.40** Intensification is not new in Waltham Forest. It has already been occurring in the borough for years through both large-scale and micro-scale development, such as housing extensions. To accommodate the significantly higher growth required by this Plan, however, intensification will need to increase and accelerate. The challenge is to ensure that the right forms of intensification occur at the right locations. Intensification supports the sustainability of the built environment by optimising the use of existing infrastructure, including de-centralised energy networks, statutory utilities, roads and parks. It also supports the use of existing social facilities, services and amenities, such as fire stations, libraries, recreation spaces and schools. In addition, intensification provides opportunities to integrate housing options for people of all ages and stages of life into established communities and helps revitalise existing neighbourhoods.

### Policy 7

#### Encouraging Mixed Use Development

In contributing towards the supply of homes and jobs, mixed use development proposals will be encouraged across the borough particularly in Strategic Locations.

- A. In considering whether a mix of uses should be sought, the most appropriate mix of uses for a site and whether that mix can practically be achieved, the Council will consider the following:
- i. The location of the development and the character of the area;
  - ii. Whether the proposed mix of uses would be appropriate in the existing street frontage;
  - iii. The design quality of the proposal;
  - iv. The financial and economic viability of the proposal;
  - v. The contribution that land use swaps and off-site contributions could make;
  - vi. Any other planning objectives considered to be a priority for the area;

- vii. The extent to which planning conditions could be used to protect the amenity of existing and future residents and businesses, and;
  - viii. The compatibility of the proposed use(s) with existing, proposed and adjoining uses;
- B. Where new commercial units are proposed as part of mixed-use residential schemes, proposals must be supported by an implementation/marketing strategy to secure the timely occupation of such units. Where alternative uses are proposed as replacement uses in consented schemes, supporting market evidence will be required to demonstrate that the unit has been advertised on reasonable and realistic terms over a period of two years.

**4.41** While recognising the positive benefits that could come from mixed use developments, they may not be appropriate in all circumstances or locations. Accordingly, where planning permission is required, the acceptability of such uses will need to be carefully considered. The policy identifies the criteria that will be applied in considering mixed use proposals.

**4.42** There are many forms of mixed use development. Vertical mixed use development combines different uses within the same building. Typically, this could be in the form of more public uses on the lower floor such as retail shops, restaurants, or commercial businesses, and the provision of other uses on the upper floors such as residential homes, hotel rooms, or office space. Alternatively, horizontal mixed use development could consist of single-use buildings within an area or site which allows for a range of land uses, providing for a variety of complementary and integrated uses that are walkable and within a neighbourhood area or larger site. In some cases, mixed use development may be more complex and slower to deliver than corresponding single function schemes. Barriers to delivering mixed use development are often linked to development economics with implications for land ownership and place management. This policy seeks to ensure that all elements of schemes proposed and consented for mixed use development can be delivered.

**4.43** This Plan recognises the positive contribution that mixed-use developments provide to support the vitality and viability of local areas. However, there have been instances in the borough where some new housing-led, mixed use developments have detracted from local areas due to the existence of vacant ground floor commercial units following the completion of the residential aspects of the scheme. Part B of the policy seeks to manage this issue by requiring developers to proactively work towards ensuring the timely occupation of units through the submission of a marketing/implementation strategy to plan for and provide assurance that any non-residential ground floor spaces provided in new mixed use developments do not remain vacant for long periods.



## Policy 8

### Character-Led Intensification

Opportunities for intensification of development involving housing and employment uses will be promoted at appropriate locations, justified in accordance with the following approach:

- A. **Reinforcement:** applicable to sites/areas with robust and desirable character where opportunities for redevelopment will involve modest intensification;
- B. **Transition:** applicable to sites/areas where considerable intensification would be justified, resulting in some change in existing character; and
- C. **Transformation:** applicable to sites/areas with a fragmented urban grain, where a transformative approach to intensification and change to existing character can be justified to deliver substantially more development.

**4.44** Intensification involves the development of a property, site or area at a higher density than currently exists, through development, redevelopment, infill and expansion or conversion of existing buildings. This Plan seeks to achieve the optimum amount of intensified good growth and sustainable development. This policy seeks to encourage intensification within built up areas across the borough in order to ensure that the right forms of intensification occur at the right locations. Typically, reinforcement will apply to sites/areas outside the designated centres, major routes, borough arrival points and Strategic Locations. Transition will apply to the designated centres, major routes, borough arrival points and Strategic Locations. Transformation will apply to sites in the Strategic Locations with high public transport accessibility and significant planned infrastructure investment.

**4.45** The character-led approach to intensification is supported by evidence from the Characterisation and Intensification Study (2019)<sup>(3)</sup>. This sets out in considerable detail the characteristics and design implications of each category of intensification. For guidance in interpreting the policy, a method of assessment involving 'Floor Area Ratio' (FAR) can be applied. This compares the total floor area of a building or collection of buildings to site area. Rather than using density, this method better captures densities in mixed use developments, instead of simply residential uses as it includes all floor areas. More detailed guidance on how to identify and assess the character of an area, and the approach to character-led intensification that will be most acceptable, will be set out in the Exemplar Design Supplementary Planning Document (SPD).

**4.46** The application of Policy 8 'Character-Led Intensification', the policies in 'Creating High Quality Places', Local Plan Part 2 - Site Allocations and the Exemplar Design SPD should enable the effective and efficient use of land, ensuring that appropriate density and intensification is achieved in a manner that is informed by, and responds to, the character and context of the site under consideration. In accordance with this method, and to avoid under-utilisation of land, as a guide, development proposals will be encouraged to deliver a FAR of at least 1.0, unless exceptional circumstances prevent this.

3 [Waltham Forest Character and Intensification Study \(2019\)](#)

## Implementation

**4.47** The policies and proposals of this chapter of the Plan will be delivered primarily through the determination and implementation of planning applications for the development and use of land and buildings. However, the success of the Local Plan will be dependent on partnership working between the Council, developers, infrastructure providers, and other interested stakeholders. Delivering the Spatial Strategy will require the following delivery tools:

- **Local Plan Part 2 - Site Allocations DPD** will identify and allocate land for particular types of development or use to deliver the Local Plan vision and objectives. It complements this Plan.
- **Area-based SPDs/masterplans** will be used to guide and co-ordinate development in Strategic Locations and elsewhere as may be necessary.
- **Planning briefs** will be used where necessary to bridge the gap between the Local Plan and a planning application.
- **Neighbourhood Plans** will have a crucial role in expanding and adding to the policies and proposals of this Local Plan to address detailed local circumstances. They are optional plans produced by a designated neighbourhood organisation to guide the development of a neighbourhood or local area. Where prepared, the Council expects these to support the aspirations of the Local Plan to promote growth in the local areas identified and address local housing needs. They should not constrain the delivery of Plan strategy as set out above. They will be expected to provide further detail in translating the strategic policies of this Plan or specify (as may be necessary) additional design standards and controls for the good management of the Neighbourhood Plan area. They should seek to promote growth in the local areas identified and address local housing needs.

## South Waltham Forest

**5.1** In this Plan, the borough is divided into three areas: South Waltham Forest, Central Waltham Forest and North Waltham Forest. Each of these areas is made up of thriving places and diverse communities, rich in culture and heritage. The divergent character of each area presents different challenges and opportunities requiring a more locally distinctive policy response, respectful of area character. This chapter sets out the spatial and policy approach applicable to South Waltham Forest. The policies in this section should be read in conjunction with other policies in the Plan and relevant Conservation Area Appraisals and Management Plans.

**5.2** The south of the borough offers the greatest opportunities for regeneration and good, inclusive growth, both during the Plan Period and beyond. The area's potential is recognised by the Mayor of London in the London Plan (2021), with the Lee Valley designated as an Opportunity Area at a sub-regional level. The area is also located within the UK Innovation Corridor. In the London Plan (2021) Leyton, Leytonstone and Bakers Arms are designated as town centres which are located within Strategic Areas for Regeneration.

**5.3** South Waltham Forest encompasses the area extending from Low Hall Sports Ground and the A104 Lea Bridge Road in the north to the Queen Elizabeth Olympic Park and A12 in the south. The A112 (Leyton High Road) runs north to south and broadly splits the area in half. To the west of the A112 are the areas of Lea Bridge, Low Hall and Leyton Town Centre. The east includes the Bakers Arms District Centre, Whipps Cross Hospital, Leytonstone Town Centre and South Leytonstone.

**5.4** Along its northern edge, South Waltham Forest abuts Walthamstow Wetlands and the reservoirs at Coppermill Lane. The River Lea, Lee Valley Regional Park and Hackney Marshes are to the west. The eastern boundary is defined by Epping Forest and Wanstead Flats in the London Borough of Redbridge.

**5.5** The south of the borough has two London Underground Stations at Leyton and Leytonstone, both on the Central Line and it has London Overground stations at Leyton Midland Road and Leytonstone High Street – both on the Gospel Oak to Barking line. Lea Bridge Station provides National Rail services to Tottenham Hale and Stratford. There are also aspirations for a further National Rail station on the same line at Ruckholt Road. The South Area has benefited from investment in new cycle routes together with improvements to the pedestrian environment, especially along the Lea Bridge Road, as part of [Enjoy Waltham Forest](#) (through the Transport for London "Mini Holland" programme). This makes the area highly accessible when walking and cycling.

**5.6** South Waltham Forest's character is predominantly Victorian with some Edwardian, post-war and modern development. Its density is noticeably higher than that of the north of the borough and there are higher levels of historic deprivation. Overall, the area is characterised by terraced streets, but also features larger developments such as Ruckholt Road or Johnston Court in Oliver Road. Within South Waltham Forest, the Lea Bridge area is characterised by the employment land at Argall Avenue, Lammas Road and Rigg Approach, the reopened Lea Bridge Station and the new development at 97 Lea Bridge Road. Low Hall centres on the Low Hall Depot and Low Hall Sports Ground, and Church Lane on the Estate

Way Industrial Estate. The Leyton Mills Retail Park and Leyton Orient Football Club form distinctive parts of Leyton, whilst Whipps Cross is defined by the Whipps Cross Hospital. Bakers Arms and Leytonstone are traditional town centres.

**5.7** Public engagement on Area Frameworks for the Lea Bridge, Leytonstone Town Centre and South Leytonstone Strategic Locations has been carried out. Area Frameworks explore the development potential of the key and strategic sites in these locations and the wider benefits that associated investment should deliver around and between them. The outcomes of this consultation will inform Local Plan 2 - Site Allocations, and delivery plans will be produced based on the feedback provided from residents, businesses and other local stakeholders.

**5.8** South Waltham Forest has five Conservation Areas - Bakers Arms, Thornhill Road, Leytonstone, Browning Road, and Leyton Town Centre - all of which serve to protect and enhance the area's historic interest and heritage significance.



### South Waltham Forest Vision

The south of the borough has the greatest opportunities for regeneration and good growth. By 2035, its neighbourhoods and town centres will be better connected, creating a new and exciting part of the city.

Inward investment in the area will have delivered 14,930 new, high quality homes (including genuinely affordable homes) and 3,250 new jobs, all of which will be served by improved transport infrastructure, employment land and accessibility.

Lea Bridge, Low Hall and Leyton will become distinctive neighbourhoods with new, quality homes. Lea Bridge, Low Hall and Church Road will continue to be the largest employment areas in the borough, becoming the dynamic hub of a diverse, growing and resilient creative economy which retains its industrial nature.

A new station at Ruckholt Road will further improve the connectivity of Leyton, opening opportunities for a new mixed use neighbourhood at Leyton Mills. In the early years of the plan period, Coronation Square will have been delivered. It will be a desirable and liveable part of the borough with a new health hub, pre-school nursery, enhanced leisure centre, commercial space for shops and businesses and an attractive civic square.

The more established areas of Leytonstone Town Centre, South Leytonstone and Bakers Arms will be enhanced by building on their historic and cultural characteristics, transitioning into attractive metropolitan town centres with new quality homes. Whipps Cross will be an important community hub, centring on a brand-new state-of-the-art hospital, supporting community and health services and new, high quality homes. These areas will benefit from improved transport access via the new Elizabeth Line to the south.

All of these places will be defined by their access to high quality green and open space across the south of the borough, including the Lee Valley Regional Park. [Enjoy Waltham Forest](#) and other active travel improvements will provide enhanced walking and cycling access to social and community infrastructure, including a thriving cultural offer and unique sporting facilities.

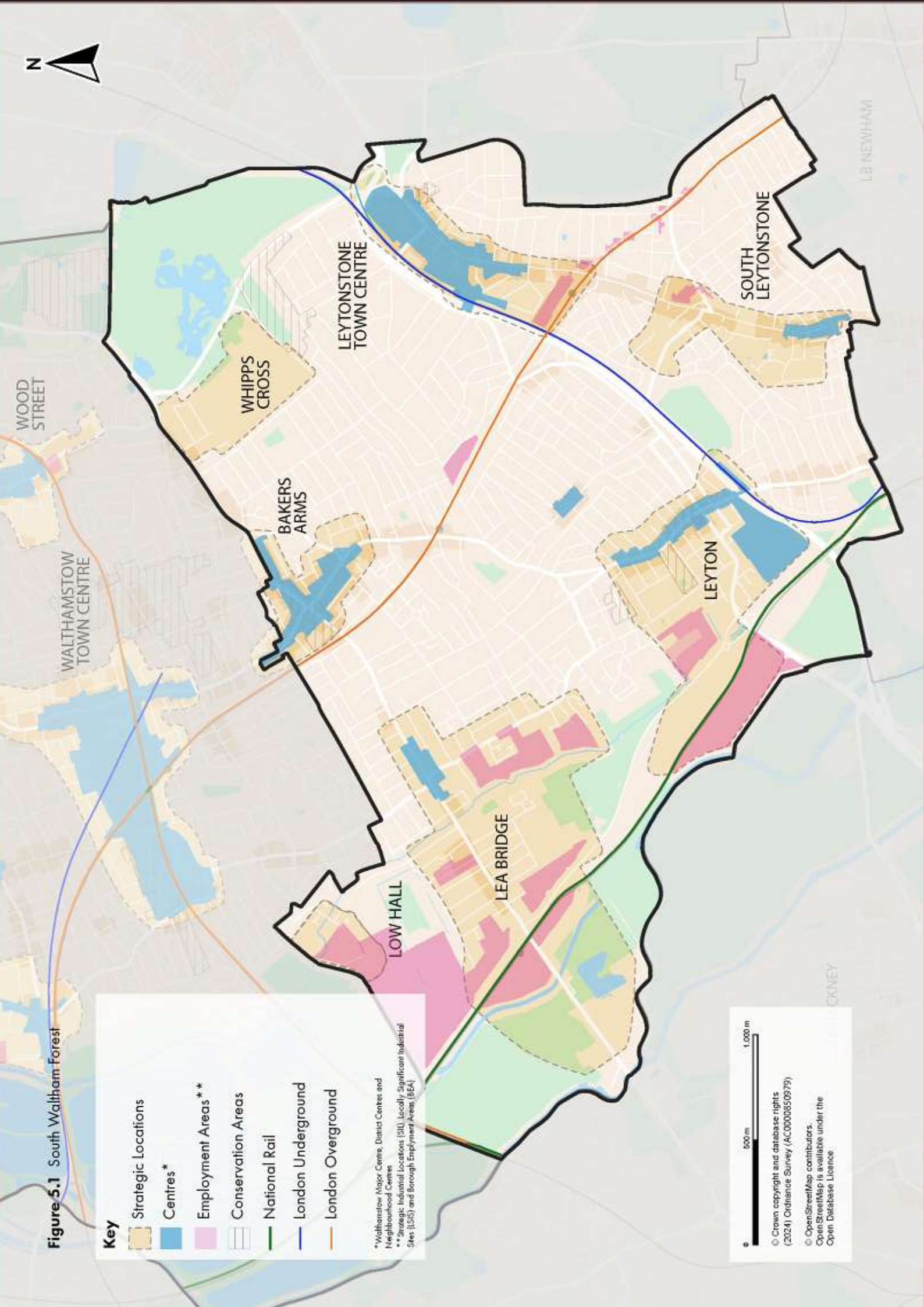


Figure 5.1 South Waltham Forest

**Key**

- Strategic Locations
- Centres\*
- Employment Areas\*\*
- Conservation Areas
- National Rail
- London Underground
- London Overground

\*Walthamstow Major Centre, District Centres and Neighbourhood Centres  
\*\*Strategic Industrial Locations (SIL), Locally Significant Industrial Sites (LSIS) and Borough Employment Areas (BEA)



0 500 m 1,000 m

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**Policy 9****South Waltham Forest**

As the priority area for regeneration and good growth, proposals will be supported where they:

- A. Contribute to the delivery of a minimum of 14,930 new quality homes across South Waltham Forest comprising of:
  - i. 1,640 new homes in the Lea Bridge Strategic Location;
  - ii. 610 new homes in the Low Hall Strategic Location;
  - iii. 6,740 new homes in the Leyton Strategic Location;
  - iv. 650 new homes in the South Leytonstone Strategic Location;
  - v. 1,580 new homes in the Leytonstone Town Centre Strategic Location;
  - vi. 1,490 new homes in the Whipps Cross Strategic Location;
  - vii. 630 new homes in the Bakers Arms Strategic Location; and
  - viii. 1,590 new homes outside Strategic Locations;
- B. Promote and support the delivery of at least 3,250 new jobs in South Waltham Forest;
- C. Support the creation of a new mixed use neighbourhood of Leyton Mills in the Leyton Strategic Location, focused around a potential new station at Ruckholt Road, in accordance with Local Plan Part 2 - Site Allocations, and/or as part of masterplan proposals;
- D. Enable the delivery of a new state-of-the-art hospital at Whipps Cross, in accordance with Local Plan Part 2 - Site Allocations, and/or as part of masterplan proposals;
- E. Enable investment in, and the regeneration of Leytonstone District Centre (including Tesco, Matalan, and Church Lane Car Park), Leyton District Town Centre and Thatched House Neighbourhood Centre (see Policies Map);
- F. Fully realise redevelopment opportunities in the Lea Bridge Strategic Location, including supporting further improvements to Lea Bridge Station, in accordance with Local Plan Part 2 - Site Allocations, and/or as part of masterplan proposals;
- G. Re-provide the waste services from the Leyton Refuse and Recycling Centre in line with the requirements of the North London Waste Plan (Policy 1);
- H. Contribute to the cultural and sporting assets available to the south of the borough, to enhance the visitor economy, support the area's local centres and businesses and build a vibrant evening and night-time offer;
- I. Deliver improvements at Lea Bridge and Bakers Arms that improve safety and incorporate Designing Out Crime and Secured by Design principles (see Policy 58 'Making Places Safer and Designing Out Crime');
- J. Provide strong links to the adjoining Queen Elizabeth Olympic Park, International Quarter and Stratford City;
- K. Preserve or enhance the Bakers Arms, Thornhill Road, Leytonstone, Browning Road, and Leyton Town Centre Conservation Areas (see Policy 72 'Conservation Areas');
- L. Contribute to improving walking and cycling connectivity around the wider area via public realm improvements;

- M. Create opportunities to improve and grow the visitor, sporting and wider cultural offer of the Lee Valley Regional Park and its venues; including the Lee Valley Ice Centre, the Lee Valley WaterWorks Centre and the Lee Valley Hockey and Tennis Centre, thereby ensuring their long-term sustainability and contribution to the visitor economy of the borough;
- N. Contribute to the management and mitigation of the impact of development on the Epping Forest Special Area of Conservation (EFSAC) (in line with the requirements of Policy 81 'Epping Forest and the Epping Forest Special Area of Conservation') and the Lee Valley Special Protection Area (in line with the requirements of Policy 82 'The Lee Valley Regional Park'); and protect and enhance the Green Belt and Metropolitan Open Land (MOL) (in line with the requirements of Policy 77 'Green Infrastructure and the Natural Environment') and improving access where appropriate.

**5.9** The south of the borough has the opportunity to deliver sustainable growth and transformative large scale regeneration, including the greatest potential to deliver new homes and jobs in the borough. This is due to its proximity to Stratford City and the Queen Elizabeth Olympic Park, excellent links into central London and opportunity for redevelopment of brownfield land. The Local Plan seeks to capture the benefits arising from investment in Stratford, including the development at the East Bank. The area has good access to high quality green spaces, including the Lee Valley Regional Park, the Queen Elizabeth Olympic Park and Jubilee Park. In line with Policy 4 'Location of Growth' development in the south of the borough will be directed towards the Strategic Locations of Lea Bridge, Low Hall, Leyton, South Leytonstone, Leytonstone Town Centre, Whipps Cross and Bakers Arms, specifically the Site Allocations identified in Local Plan 2. Growth and development will be directed to these Strategic Locations as they are sustainable locations for development with access to facilities including shops, social and community infrastructure, open spaces and parks and public transport.

**5.10** Both the Waltham Forest Growth Capacity Study (2018) and the GLA Strategic Housing Land Availability Assessment (SHLAA) (2017) identified the largest capacity of brownfield land in Waltham Forest to be in the south of the borough. The Growth Capacity Study (2018) considers that South Waltham Forest has the potential to deliver 14,930 high-quality new homes (see Policy 12 'Increasing Housing Supply'). Local Plan Part 2 - Site Allocations will set out the approach for many of the sites on which these new homes will be delivered.

**5.11** The south of the borough also plays an important economic role and the Employment Land Study (2019) has identified the potential to deliver 3,250 new jobs over the Plan Period (see Policy 24 'Supporting Economic Growth and Jobs').

**5.12** There is an opportunity to deliver significant sustainable, mixed-use development around Leyton Mills and New Spitalfields. To support this growth sustainability in the south of the borough, the Council is considering how it can improve public transport accessibly in the area. Potential for a new station has been identified at Ruckholt Road and the Council aspires to see this delivered to support new development in the area surrounding it.



**5.13** Whipps Cross Hospital is important infrastructure asset for the borough and the wider sub-region. Both Barts Health NHS Trust and the Council understand that the hospital needs investment and modernisation to ensure that it is fit for purpose and it can improve the care patients receive. The hospital will receive funding through the Government's £2.7 billion Health Infrastructure Plan, announced in 2019, to create a new state-of-the-art hospital.

**5.14** The south of the borough's town centres need investment and support to be more competitive. They have localised catchments which rely on high frequency food shopping trips and other linked trips to supporting service uses. They face significant challenges with on-going competition and the wider general pressures facing UK High Streets. This Plan aims to support them by promoting attractive uses and environmental improvements and embedding them at the heart of the 15 Minute Neighbourhood approach to encourage residents to continue to spend locally to sustain their vitality and viability.



**5.15** Development around transport hubs and nodes is supported in both the NPPF (2021) and the London Plan (2021) as they are considered to be more sustainable locations for new homes. In line with this approach, this Plan supports the delivery of new homes and an improved entrance to Lea Bridge Station in the Lea Bridge Strategic Location.

**5.16** The south of the borough is home to some of the borough's waste sites. Any proposals coming forward on these sites will be expected to adhere to policies set out in the adopted North London Waste Plan (2022) and Policy 93 'Waste Management' of this Plan.

**5.17** The south of the borough is home to important sporting and cultural venues. These include the Lee Valley Ice Centre, the Lee Valley Riding Centre and the Lee Valley Waterworks Centre, Nature Reserve & Middlesex Filter Beds in Lea Bridge; Leyton Orient Football Club, "Feel Good Too" (formerly Ive Farm Fields) and the Lee Valley Hockey and Tennis Centre in Leyton; and the Leyton County Cricket Ground. There are opportunities to add to these facilities, including supporting the night-time economy (see Policy 44 'Evening and Night-Time Economy Uses'), in Strategic Locations and Town Centres (see Policy 38 'Hierarchy of Centres'), and the borough's cultural and sporting needs (see Policy 35 'Promoting Culture and Creativity').

**5.18** The Council is committed to ensuring everyone feels safe within the borough. Lea Bridge and Bakers Arms have been identified as areas that require specific focus on Designing Out Crime and Secured by Design measures. Developments which seek to address this will be supported where they are in accordance with Policy 58 'Making Places Safer and Designing Out Crime'.

**5.19** South Waltham Forest is home to some important heritage assets. This includes five of the borough's conservation areas: Bakers Arms, Thornhill Road, Leytonstone, Browning Road and Leyton Town Centre. Development which protects and enhances these areas, in line with Policy 72 'Conservation Areas', will be supported.

**5.20** Encouraging walking and cycling is a key priority for this Local Plan, the Mayor's Transport Strategy and the London Plan (2021). An interconnected green and blue infrastructure network, with public realm routes to key designations, facilities or amenities across South Waltham Forest will be identified through supporting planning policy documents and guidance as set out in Policy 4 'Location of Growth' and Policy 5 'Management of Growth', including the Green and Blue Spaces Supplementary Planning Document.

## Implementation

**5.21** The implementation tools set out in Policy 4 'Location of Growth' and Policy 5 'Management of Growth' include:

- The Brownfield Land Register;
- Area-based Supplementary Planning Documents and masterplans; and
- Planning Briefs.

**5.22** These documents will provide more detail guidance to developers on the area. Furthermore, Local Plan Part 2 - Site Allocations will set out site specific requirements for strategic and key sites across the South of the Borough. The Council will work collaboratively with designated Neighbourhood Forums to assist with their preparation of any Neighbourhood Plans that come forward.

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

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



## Central Waltham Forest

**6.1** In this Plan, the borough is divided into three areas: South Waltham Forest, Central Waltham Forest and North Waltham Forest. Each of these areas is made up of thriving places and diverse communities, rich in culture and heritage. The divergent character of each area presents different challenges and opportunities requiring a more locally distinctive policy response, respectful of area character. This chapter sets out the spatial and policy approach applicable to Central Waltham Forest. The policies in this section should be read in conjunction with other policies in the Plan and relevant Conservation Area Appraisals and Management Plans.

**6.2** Central Waltham Forest provides the civic, economic and retail focus of the borough. It is home to many of Waltham Forest's cultural and creative industries and visitor attractions. The area's potential for good, inclusive growth is recognised by the Mayor of London, with the Lee Valley designated as an Opportunity Area in the London Plan and specific opportunities for growth identified at Walthamstow and Blackhorse Lane. The area is also located within the UK Innovation Corridor. The London Plan also designates Walthamstow and Wood Street as Strategic Areas for Regeneration. Walthamstow is designated as a Major Centre, with its night-time economy identified as being of regional or sub-regional importance.

**6.3** Central Waltham Forest encompasses the area extending south from the A406 North Circular in the north to Low Hall Sports Ground and the A104 Lea Bridge Road in the south. It is bound by Walthamstow Wetlands and the London Borough of Haringey in the west and the Epping Forest Special Area of Conservation (SAC) and the London Borough of Redbridge to the east. The A112 (Chingford Road and Hoe Street) runs north to south, broadly splitting the area in half, and the A503 (Forest Road) runs across it from east to west.

**6.4** The Central Area has two London Underground Stations, Walthamstow Central and Blackhorse Road, both on the Victoria Line. There are London Overground services from five stations: Wood Street, Walthamstow Central Transport Interchange and St James Street on the Chingford to Liverpool Street line and Queens Road and Blackhorse Road on the Gospel Oak to Barking line. Walthamstow Central Transport Interchange also has a bus station serving North East London, which is a key bus network for the borough and North East London. St James Street Station also has a bus terminus. The area has benefited from investment in new walking and cycle routes, together with improvements to the pedestrian environment as part of Enjoy Waltham Forest (through Transport for London's "Mini-Holland" programme), all of which make the area highly accessible by sustainable modes of travel.

**6.5** The character of Central Waltham Forest is predominantly defined by Victorian and Edwardian terraces with some inter-war and modern development. Traditional forms of development along the terraced streets include the Warner Estates to the west of Lloyd Park. The density of the area is noticeably higher than that of North Waltham Forest.

**6.6** Walthamstow Central Transport Interchange is the transport focus for Walthamstow Town Centre, with retail concentrated around the Town Square and the main shopping centre of the The Mall situated between Selbourne Road and the High Street.

Walthamstow Market is a key retail asset for Walthamstow Town Centre. At one kilometre long, the street market is often described as the longest street market in Europe, having an extensive 180 year history and strong local support.



**6.7** Hoe Street contains an eclectic mix of independent retailers and is home to the Grade II\* listed former EMD Cinema, which is currently subject to major investment by the Council to restore the listed auditorium to a 1000 seat performance venue, and will become known as Soho Theatre, Walthamstow. Central to Walthamstow is The Scene - an award-winning development with residential homes, a cinema and restaurants, and Central Parade - a Grade II listed building, which combines residential homes with a mixed-use creative hub, co-working studio, exhibition and retail space.

**6.8** Forest Road connects Epping Forest at its eastern end with Walthamstow Wetlands at its western end. The Town Hall Campus, with its Grade II\* listed buildings and grounds is being developed with commercial, cultural and residential uses alongside its civic function, to create a place known as 'Fellowship Square'. This is providing a stimulus for further regeneration along the corridor.

**6.9** Also located on Forest Road is the historic William Morris Gallery, Lloyd Park and Bell Corner.

**6.10** This Plan designates part of the Blackhorse Lane area as a Creative Enterprise Zone (CEZ) in line with the London Plan Policy HC5 (see Policy 37 'Blackhorse Lane Creative Enterprise Zone'). This designation builds on Blackhorse Lane's rich history of manufacturing items such as textiles, glass, paint, aircraft engines and shop mannequins. The area has excellent access to the Walthamstow Wetlands and the borough's main cultural attractions and is well served by Blackhorse Road Station. Within the Creative Enterprise Zone, development should provide flexible and creative workspaces which provide attractive and

affordable options for start-up and incubator businesses alongside other uses. The Council will also support 'meanwhile' uses on a temporary basis that allow businesses to contribute to the variety and vibrancy of the area.

**6.11** Wood Street connects the Forest Road Corridor to Epping Forest at Hollow Ponds, opposite Whipps Cross. This area has been subject to significant investment and regeneration in recent years to improve the experience for residents and visitors, including the housing estate regeneration at Marlowe Road and the delivery of the new Wood Street Library. Wood Street is an attractive shopping destination with boutique independent shops, cafés, restaurants and bars and the famous Wood Street Indoor Market, which provides space for small independent and niche retailers.

**6.12** The Walthamstow Village and Orford Road area is the historic village nucleus, centred on the ancient parish church and churchyard of St Mary's. These areas have vibrant and diverse communities which support the growth of the borough's evening economy. It is a culturally rich area, with the Vestry House museum presenting the expansive history of the borough. Between Walthamstow Village and Wood Street is the Ravenswood Industrial Estate, which supports local employment opportunities and facilitates economic growth.

**6.13** The Higham Hill neighbourhood is situated to the north-west of Central Waltham Forest. It is predominately residential in character, but provides local retail and employment opportunities as well as access to key community services such as schools, a health centre and local library.

### Central Waltham Forest Vision

Central Waltham Forest is the civic, creative, economic and retail heart of the borough supported by the other centres.

Over the Plan Period Walthamstow Town Centre will continue to thrive as a vibrant and active Major Town Centre. It will become the primary hub for entertainment, culture and the evening and night-time economy. There will be a continued focus on retail as well as strengthening the centre's role as a location for employment and study through the provision of flexible, creative workspaces and higher education facilities at the new University of Portsmouth Campus. New high quality homes will also be delivered, ensuring the delivery of a mixed and vibrant 15 Minute Neighbourhood. St James Quarter will continue to develop into a well connected neighbourhood with high quality new homes, workspaces and community facilities, and accessible, safe and well designed public spaces for people to gather, enjoy and relax.

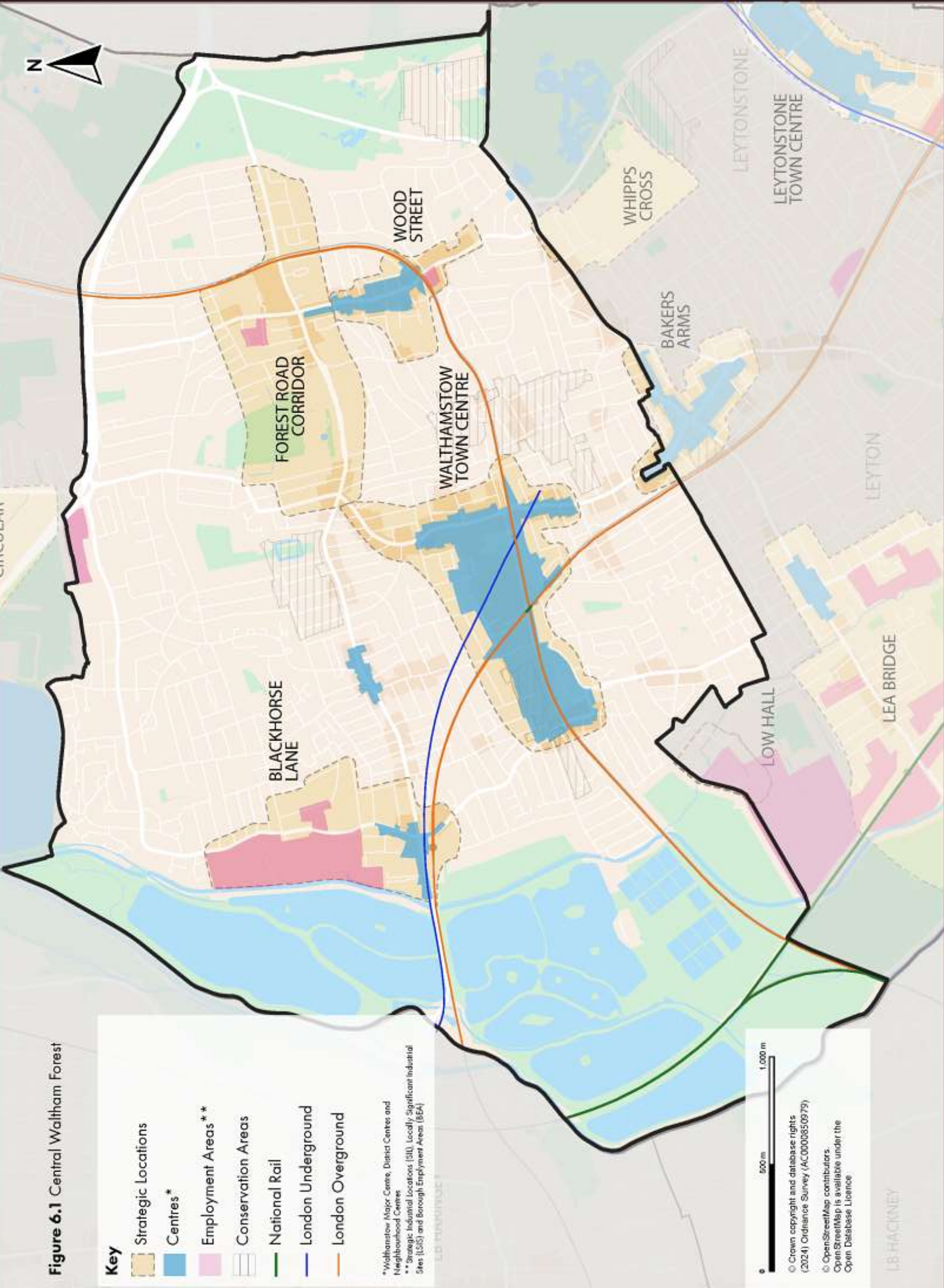
Fellowship Square (the former Waltham Forest Town Hall Campus) will become the focus of a transformational cultural redevelopment forming a new, dynamic and active neighbourhood consisting of new, high quality homes, workspace, shops and public realm whilst retaining its civic function. It will act as a catalyst for long-term regeneration of the Forest Road Corridor, creating clear links between Walthamstow Town Centre and Wood Street, together providing a well-connected network of vibrant centres for local residents and visitors to work in, live in and enjoy.

As the borough's Creative Enterprise Zone, Blackhorse Lane will continue to support Waltham Forest's creative economy and form the heart of a creative living and working community, with new jobs, quality homes, shops and cafes alongside the existing and regionally significant light industrial, manufacturing and production uses.

Building on its village feel, Wood Street will become an increasingly attractive destination, serving its growing local population with a diverse range of independent shops and a varied food, drink and cultural offer. Through the Marlowe Road development, the new Wood Street Library has been delivered, and Trowbridge Plaza and the new playspace have become important public spaces for events and markets.

Areas such as Walthamstow Village, Ravenswood Industrial Estate and the St James Quarter will be supported and enhanced, including in relation to the growth of the evening economy.

**Figure 6.1** Central Waltham Forest



**Key**

- Strategic Locations
- Centres\*
- Employment Areas\*\*
- Conservation Areas
- National Rail
- London Underground
- London Overground

\*Walthamstow Major Centre, District Centres and Neighbourhood Centres  
 \*\* Strategic Industrial Locations (SIL), Locally Significant Industrial Sites (LSIS) and Borough Employment Areas (BEA)

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**Policy 10****Central Waltham Forest**

As the civic and creative centre of the borough, proposals will be supported where they:

- A. Contribute to the delivery of a minimum of 8,700 new quality homes and jobs across the Central Area comprising of:
  - i. 1,850 new homes in the Walthamstow Town Centre Strategic Location;
  - ii. 1,470 new homes in the Forest Road Corridor Strategic Location;
  - iii. 3,090 new homes in the Blackhorse Lane Strategic Location;
  - iv. 400 new homes in the Wood Street Strategic Location; and
  - v. 1,890 outside Strategic Locations;
- B. Promote and support the delivery of at least 3,000 new jobs in Central Waltham Forest;
- C. Promote Walthamstow Town Centre as a major creative and economic hub of the borough, in accordance with its status as a Major Centre in the London Plan by:
  - i. Supporting proposals that seek to expand the current town centre offer, particularly the retail mix and quality, flexible workspace, cultural infrastructure and supporting the developing evening economy and associated hospitality sector;
  - ii. Supporting proposals that seek to establish and consolidate the development of a cultural quarter and evening economy at the eastern end of the High Street and a residential neighbourhood, with retail, leisure, evening economy and community and health infrastructure as part of the emerging St James Quarter at the western end of the High Street, whilst preserving or enhancing the St James Conservation Area and recent heritage shopfront and public realm investment; and
  - iii. Encouraging proposals that seek to consolidate the role and function of Walthamstow Central transport hub as a key transport interchange in outer north London, whilst supporting its potential for development and enhancement;
- D. Enable investment and the regeneration of the Wood Street District Centre and Blackhorse Lane Neighbourhood Centre;
- E. Support the Blackhorse Lane Creative Enterprise Zone in line with Policy 37 'Blackhorse Lane Creative Enterprise Zone';
- F. Enable delivery of Fellowship Square as a new multi-purpose hub and liveable neighbourhood with supporting community, social infrastructure and retention of existing civic functions, whilst conserving and enhancing the significance of the listed buildings on the site;
- G. Support proposals for new visitor attractions and related developments in the Walthamstow Town Centre Strategic Location, to complement existing cultural assets and emerging opportunities that the launch of Soho Theatre Walthamstow and investment in Hatherley Mews, Vestry House Museum and Chestnuts House in Hoe Street will generate in the local economy from 2024 onwards, increasing dwell time for residents, tourists and visitors to the borough and building on the legacy of being London's first 'Borough of Culture' in 2019;

- H. Protect, promote and enhance Walthamstow Market as a unique community asset of Walthamstow Town Centre;
- I. Preserve or enhance the heritage significance of the Lloyd Park, Walthamstow Village, Orford Road, Walthamstow St James, Leucha Road and Forest School Conservation Areas, in line with Policy 72 'Conservation Areas';
- J. Contribute to the management of and mitigation of the impact of development on the Epping Forest Special Area of Conservation (EFSAC) (see Policy 81 'Epping Forest and the Epping Forest Special Area of Conservation') and the Lee Valley Special Protection Area (see Policy 82 'The Lee Valley Regional Park'); and protect and enhance the Green Belt and Metropolitan Open Land (MOL) (see Policy 77 'Green Infrastructure and the Natural Environment'), improving access where appropriate.

**6.14** The identification of Walthamstow Town Centre as the borough's major centre and principle economic hub (see Policy 38 'Hierarchy of Centres') justifies the Council's decision to focus major investment in this area to promote sustainable economic growth in the business, retail, leisure, tourist and cultural sectors and to drive the borough's growing evening and night time economy (see Policy 44 'Evening and Night-Time Economy Uses').

**6.15** As set out in Policy 10 'Central Waltham Forest' this Plan also supports inclusive growth outside Walthamstow Town Centre, in other parts of the Central Area, including Wood Street, Forest Road, and Blackhorse Lane.



**6.16** Working in collaboration with Transport for London (TfL), the Council is committed to supporting the enhancement of Walthamstow Central Transport Interchange, and its establishment as one of north east London's key transport interchanges. This will bring greater potential for growth in the borough and also facilitate increased use of more sustainable transport modes and reduced car dependency (see Policy 60 'Promoting Sustainable Transport', Policy 61 'Active Travel' and Policy 62 'Public Transport'). In recognition of the essential service that they provide and the benefit that they bring to their respective district and neighbourhood centres, the Council will also support the enhancement of Wood Street Overground Station, St James Street Overground Station, Walthamstow Queen's Road Overground Station and Blackhorse Road Station.

**6.17** Walthamstow's Historic Street Market is often recorded as the longest street market in Europe. It has an extensive 180-year history and is a local institution. The market's primary function is as a key retail asset for the borough. Supporting improvements in terms of its appearance, function and circulation will ensure that its strong local support continues against the competition from online and chain retailers.

**6.18** The Council recognises the importance of protecting its historic assets and the unique character of each of its neighbourhoods. The St James Street area (including the St James Conservation Area), for example, combines a mixture of retail, cafés, office and residential uses, constructed by the Warner family in the late nineteenth and early twentieth century. Combined with the curving form of the street, the impressive architecture contributes to a special sense of character. In recent years the area has been transformed. For example, in 2017 a major Heritage Lottery Fund investment improved 50 shopfronts and the public realm. Public art was funded through the St James Big Local programme and the 'Crate' meanwhile space on a formerly vacant car park site was delivered. Over the coming years, the St James Quarter will continue to transform, with new, high quality homes and the new NHS Health Centre. The Council will also continue to work with key stakeholders, including Transport for London and Network Rail, to continue to improve station access, wayfinding, lighting and opportunities for opening railway arches for commercial uses and to bring them back into public use.



**6.19** The Council will be supportive of proposals which deliver new cultural and creative destinations and development which builds on the legacy of the 'Borough of Culture' (2019) and the Council's own investment in cultural assets such as Soho Theatre Walthamstow, Hatherley Mews, Vestry House Museum and Chestnuts House as creative enterprise hubs, with Levelling Up Fund investment during 2023-2025. The continued promotion of cultural and creative destinations will increase visitor and tourist footfall and dwell time in Walthamstow Town Centre, and support the growing leisure, hospitality and evening economy, generating local investment, training and employment opportunities.

### Implementation

**6.20** The implementation tools set out in Policy 4 'Location of Growth' and Policy 5 'Management of Growth' include:

- The Brownfield Land Register;
- Area-Based Supplementary Planning Documents and Masterplans; and
- Planning Briefs.

**6.21** These documents will provide more detail guidance to developers on the area. Furthermore, Local Plan Part 2 - Site Allocations will set out site specific requirements for strategic and key sites across Central Waltham Forest. The Council will work collaboratively with designated Neighbourhood Forums to assist with their preparation of any Neighbourhood Plans that come forward.

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

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

## North Waltham Forest

**7.1** In this Plan, the borough is divided into three areas: South Waltham Forest, Central Waltham Forest and North Waltham Forest. Each of these areas is made up of thriving places and diverse communities, rich in culture and heritage. The divergent character of each area presents different challenges and opportunities requiring a more locally distinctive policy response, respectful of area character. This chapter sets out the spatial and policy approach applicable to North Waltham Forest. The policies in this section should be read in conjunction with other policies in the Plan, the Highams Park Neighbourhood Plan and relevant Conservation Area Appraisals and Management Plans.

**7.2** North Waltham Forest is the largest of the three sub-areas, stretching from the Banbury Reservoir and the south side of the North Circular as far as the boundaries with Epping Forest District Council to the north. To the south of the North Circular, via the Lee Valley, the North Area is connected to the significant growth areas at Blackhorse Lane, Leyton and Stratford. To the west, the area is defined by the River Lea and Lee Valley Regional Park (which is designated as Metropolitan Open Land), with the London Borough of Enfield situated further beyond the William Girling and George V reservoirs. To the east is the boundary with the London Borough of Redbridge.

**7.3** The character of the north of the borough is generally suburban. As such, it is generally of a lower density than the Central and South Areas. North Waltham Forest is characterised by semi-detached houses and terraces interspersed with some larger detached properties. These include a mix of inter-war, Victorian and Edwardian homes often on larger plots which feature front and rear gardens. The area encompasses the borough's first Neighbourhood Plan area in Highams Park.

**7.4** The regeneration potential of the area is recognised in the London Plan (2021). The Lee Valley is designated as an Opportunity Area at sub-regional level and Highams Park is designated as a Strategic Area for Regeneration. The area is also located within the UK Innovation Corridor.

**7.5** The north of the borough has great opportunities for housing, employment and cultural growth. It is a mixed area of relatively low-density residential housing, employment land and retail. Epping Forest and the borough's fringe of Green Belt are major green assets which give this part of the borough an exceptional character. In the context of future development in Central and South Waltham Forest, and planned schemes emerging in adjacent boroughs, the area offers opportunities to improve linkages within the borough, to neighbouring areas and beyond.



### North Waltham Forest Vision

North Chingford, Highams Park and Chingford Mount are distinctive areas with the potential to be enhanced as attractive and well connected cultural centres, featuring new, high quality homes and improved public realm.

The area adjacent to the North Circular Corridor provides the opportunities for the intensification of and growth in industrial and employment-generating uses. These areas will benefit from improved bus links to Meridian Water Station, which opened in 2019. In the longer term, they may also benefit from links to Crossrail 2. Improved public transport links will also enable the expansion of the Sewardstone Road Neighbourhood Centre to incorporate new homes and establish a new gateway to the borough.

Across North Waltham Forest, the Local Plan supports the enhancement of the existing network of distinctive town centres and the integration of existing neighbourhoods with new development and investment to create new liveable places. New development will deliver a diverse mix of new homes, improved public realm, enhanced walking and cycle access and improved legibility and connectivity. The area will benefit from new workspace, transport and social infrastructure and diversified town centre uses for the local community and visitors.

The award of £8.4million 'Levelling Up' funding in 2023 provides the opportunity to invest in improvements to important public spaces such as Albert Crescent in Chingford Mount, in parks and leisure facilities in Memorial Park, Chase Lane Park and Rolls Park, and to improve the walking and cycling links between these valued green spaces. North Waltham Forest forms the gateway to Epping Forest and its richly diverse ecology and contrasting natural landscapes. In this setting, the existing town centres will evolve into successful employment, cultural and retail hubs which will stitch the north of the borough into the vibrantly metropolitan fabric of Waltham Forest.

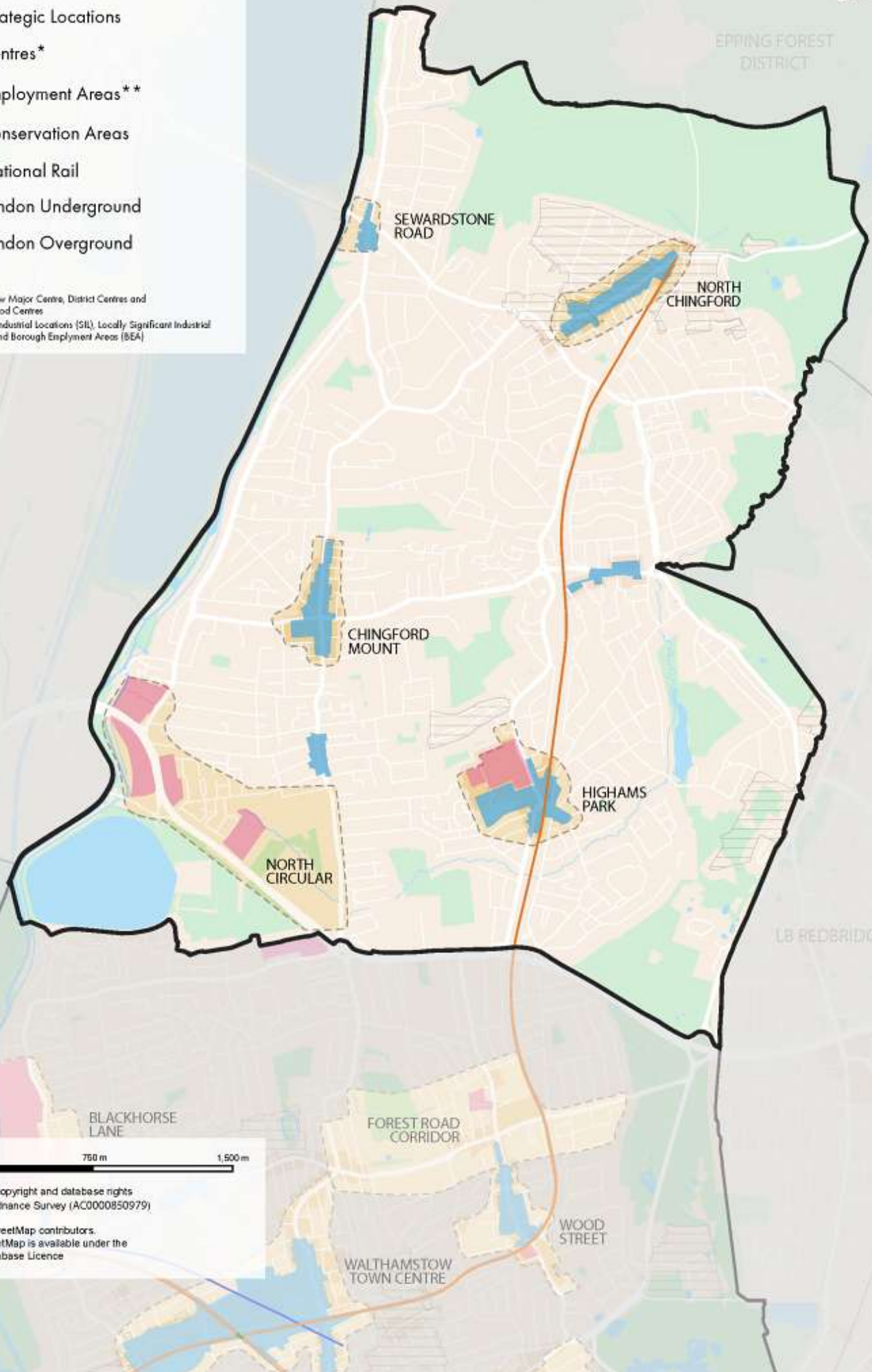
Figure 7.1 North Waltham Forest



**Key**

-  Strategic Locations
-  Centres\*
-  Employment Areas\*\*
-  Conservation Areas
-  National Rail
-  London Underground
-  London Overground

\*Walthamstow Major Centre, District Centres and Neighbourhood Centres  
\*\*Strategic Industrial Locations (SIL), Locally Significant Industrial Sites (LSIS) and Borough Employment Areas (BEA)



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## Policy 11

### North Waltham Forest

As a distinctive area for targeted investment and growth in and around the designated centres and the North Circular Corridor, proposals will be supported where they:

- A. Contribute to the delivery of a minimum of 3,370 new quality homes across North Waltham Forest comprising of:
  - i. 170 new homes in the North Chingford Strategic Location;
  - ii. 170 new homes in the Chingford Mount Strategic Location;
  - iii. 540 new homes in the Highams Park Strategic Location;
  - iv. 330 new homes in the Sewardstone Road Strategic Location;
  - v. 500 new homes in the North Circular Corridor Strategic Location; and
  - vi. 1,660 outside Strategic Locations;
- B. Reflect the local character of the area in which they are proposed and improve the quality of the local environment with particular reference to the requirements of Policy 4 'Location of Growth', Policy 5 'Management of Growth' and Policy 6 'Ensuring Good Growth';
- C. Promote and support the delivery of at least 1,950 new jobs in North Waltham Forest;
- D. Enable investment in and the regeneration of the District Centres of North Chingford, South Chingford and Highams Park, and the Sewardstone Road Neighbourhood Centre (see Policies Map);
- E. Support the development of an improved cycle and pedestrian network in accordance with Policy 60 'Promoting Sustainable Transport' and Policy 61 'Active Travel';
- F. Contribute to the management and mitigation of the impact of development on the Epping Forest Special Area of Conservation (EFSAC) (see Policy 81 'Epping Forest and the Epping Forest Special Area of Conservation') and the Lee Valley Special Protection Area (see Policy 82 'The Lee Valley Regional Park') ; and protect and enhance the Green Belt and Metropolitan Open Land (MOL) (see Policy 77 'Green Infrastructure and the Natural Environment') improving access where appropriate;
- G. Apply placemaking principles that reflect the character and local distinctiveness of Highams Park, with particular reference to the Highams Area of Special Character, and its cultural and green assets as set out in the Highams Park Neighbourhood Plan;
- H. In the North Chingford Strategic Location:
  - i. Contribute to the regeneration of North Chingford District Centre and the development of a community hub focused in this area;
  - ii. Preserve or enhance the Chingford Green and Chingford Station Road Conservation Areas in accordance with the requirements of Policy 72 'Conservation Areas';



- I. In the Chingford Mount Strategic Location:
  - i. Contribute to the development of a community hub focused in the South Chingford District Centre;
  - ii. Contribute to connectivity, diversification of commercial space, and the provision of new employment opportunities;
  - iii. Protect and enhance local character and improve public spaces, with a focus on Albert Crescent;
- J. In the Sewardstone Road Strategic Location:
  - i. Focus new development on the area of Kings Head Hill/Sewardstone Road junction;
  - ii. Contribute to the improvement of public realm and public spaces, walking and cycling accessibility and connectivity, permeability and legibility to Ponders End and wider improvements and investment in the London Borough of Enfield, and North Chingford and South Chingford District Centres, in addition to other identified routes;
- K. In the North Circular Corridor Strategic Location;
  - i. Provide opportunities to link to the neighbouring large scale regeneration and infrastructure investment at Meridian Water in the London Borough of Enfield;
  - ii. Strengthen the character and identity of the A406 corridor through design improvement measures for better safety, improved air quality, and the creation of functional and effective connections with local places, activity hubs and communities;
  - iii. Contribute to new leisure opportunities in and around the Banbury Reservoir, whilst preserving and enhancing the openness of the Green Belt and providing additional biodiversity benefits and which contribute to the aims of Policy 77 'Green Infrastructure and the Natural Environment', Policy 78 'Parks, Open Spaces and Recreation' and Policy 81 'Epping Forest and the Epping Forest Special Area of Conservation'.

**7.6** The north of the borough presents a significant opportunity for good growth and regeneration in Waltham Forest, that is different from the other two sub areas given its position between the suburbs and Epping Forest.

**7.7** New, high quality homes will be expected to be delivered in parallel with new employment opportunities, in livable and mixed use 15 Minute Neighbourhoods – enhancing the area's vibrancy and diversity. Community uses, workspace, retail, leisure, cultural and a suitable evening and night-time offer will be directed to designated district centres. Neighbourhood centres and local centres will provide retail and services.

**7.8** The delivery of regeneration and good growth should be based on place-making principles that respond to the unique character, heritage and culture of each area. Development should protect and enhance the Chingford Green, Chingford Station Road, Ropers Field and Woodford Green Conservation Areas. Investment to regenerate retail should be aimed at maintaining and improving the vitality and viability of the district centres and neighbourhood centres to encourage residents to continue to spend locally to sustain their long term prospects.



**7.9** Public engagement on an Area Framework for the Chingford Mount Strategic Location has been carried out. The Area Framework explores the development potential of the key and strategic sites in the area and the wider benefits that associated investment should deliver around and between them. The outcomes of this consultation will inform Local Plan Part 2 - Site Allocations, and a delivery plan will be produced based on the feedback provided from residents, businesses and other local stakeholders.

**7.10** The intrinsic character of the Highams Park area should be preserved and enhanced as detailed in the Highams Park Neighbourhood Plan. Improvement to Highams Park Overground Station entrance will be supported to create an accessible public space, with opportunity for small retail units, events and markets in collaboration with the Highams Park Planning Group, local businesses and residents, and building on the initial study and engagement carried out through the GLA's Hight Streets for All programme in 2022.

**7.11** Growth in the neighbouring London Borough of Enfield, together with the potential delivery of Crossrail 2 in the future, provide important opportunities to regenerate the North Circular Corridor and Sewardstone Road Strategic Locations to provide industrial intensification, new housing, and to contribute to the improved vitality and viability of the Sewardstone Road Neighbourhood Centre. In addition, regeneration in these locations will provide greater connectivity for residents to locations both inside and outside the borough by encouraging walking and cycling. Encouraging walking and cycling is a key priority for this Local Plan, the Mayor's Transport Strategy and the London Plan (2021). An interconnected green and blue infrastructure network, with public realm routes to key designations, facilities or amenities across the north of the borough will be identified through supporting planning policy documents and guidance as set out in Policy 4 'Location of Growth' and Policy 5 'Management of Growth', including the Green and Blue Spaces Supplementary Planning Document.

**7.12** In addition, the planned development at Meridian Water in Enfield provides important opportunities to free up neglected open space on the Green Belt fringe of the A406 North Circular Road to provide leisure and biodiversity benefits to the occupiers of new development

and to provide Suitable Alternative Natural Greenspace (SANG) to avoid harmful recreational impacts of development on the Epping Forest Special Area of Conservation (see Policy 81 'Epping Forest and the Epping Forest Special Area of Conservation').

### Implementation

**7.13** The implementation tools set out in Policy 4 'Location of Growth' and Policy 5 'Management of Growth' include:

- The Brownfield Land Register;
- Area-Based Supplementary Planning Documents and Masterplans; and
- Planning Briefs.



**7.14** These documents will provide more detailed guidance on the area to developers. Furthermore, the Local Plan Part 2 - Site Allocations will set out site specific requirements for strategic and key sites across the north of the borough. The Council will continue to work collaboratively with the Highams Park Neighbourhood Planning Group, and support any other designated Neighbourhood Forums to prepare any other Neighbourhood Plans that come forward.

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

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

## Decent Homes for Everyone

### Strategic Objective

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.

**8.1** With Waltham Forest's population set to grow over the plan period, increasing the delivery of good quality, genuinely affordable homes to meet existing and future residents' needs is a priority for the borough and this plan. The plan aims to deliver a minimum of 27,000 new homes over a 15-year period. Fifty per cent of these new homes need to be genuinely affordable for existing and future residents. The challenge in meeting this need is recognised, but also seen as an opportunity to provide residents with a decent roof over their heads; building the homes, communities and places where people want to live and aspire to stay.

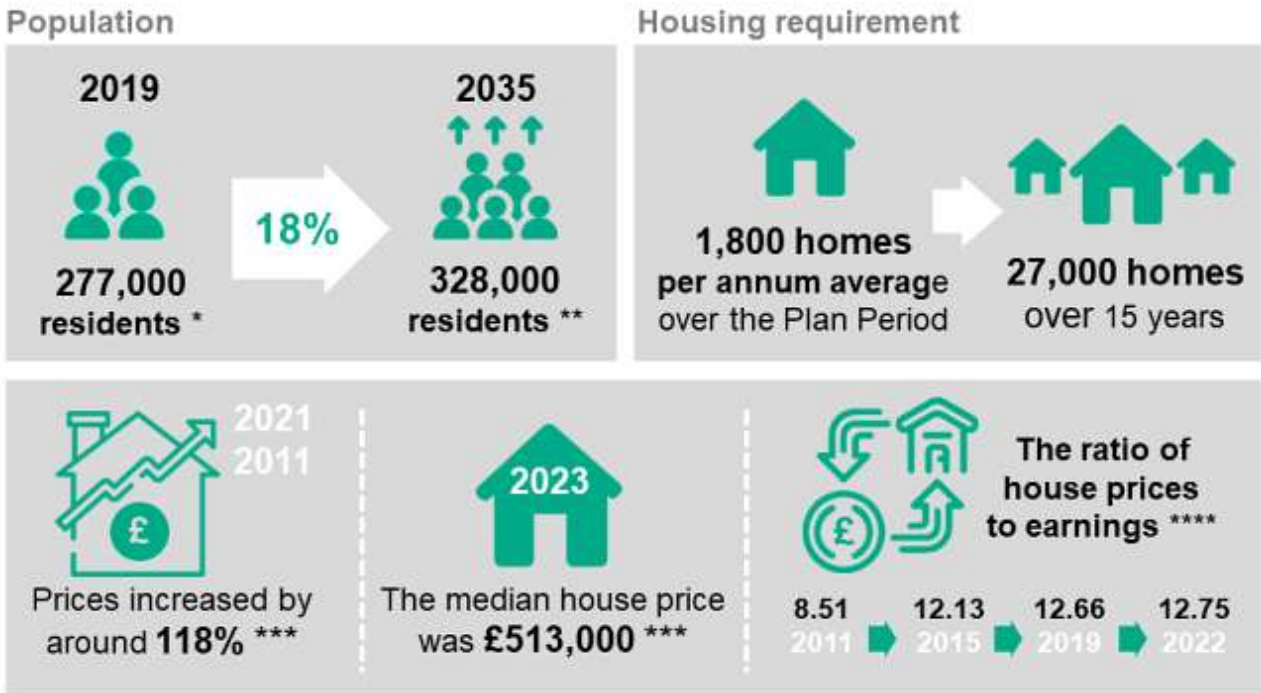
**8.2** Policies in this chapter should be read alongside the Waltham Forest Housing Strategy 2019-2024, Housing Futures: A Decent Roof for All. The Housing Strategy sets out the key objectives for housing in the borough, which this Plan will be instrumental in achieving:

- Supporting growth and aspirations within the borough;
- Tackling and preventing homelessness;
- Ensuring, decent, safe and healthy homes;
- Think Family Think Housing Think Work: inclusive and sustainable neighbourhoods.



Figure 8.1 A healthy home

**8.3** The Housing Strategy focuses on the importance of well-designed and healthy homes. The Joint Needs Strategic Needs Assessment (JSNA) has defined a 'A Healthy Home'. A healthy home needs to be affordable, be well designed, meet accessibility requirements and encourage social interaction. It is important that in increasing the delivery of new homes, that the quality is also increased.



**House prices**

\* Mid Year Estimate (ONS, June 2020)  
 \*\* BPO, Medium Scenario (GLA, 2018) & Housing Trajectory (LBWF)  
 \*\*\* Land Registry House Price Statistics  
 \*\*\*\* Median house price to median residence-based earnings ratio (ONS)

Figure 8.2 Housing in Waltham Forest

**Policy 12**

**Increasing Housing Supply**

Opportunities for housing growth in Waltham Forest will be maximised to deliver a minimum of 27,000 homes by 2035, building on and exceeding the 10-year minimum target set out in the London Plan (2021) of 1,264 per annum (2019/20 - 2026/27) and meeting housing need in Waltham Forest as far as possible by aiming to deliver an average of 1,800 new homes per annum across the Plan Period, by:

- A. Focusing delivery of new housing in Waltham Forest's Strategic Locations and Site Opportunity Locations in accordance with Policy 4 'Location of Growth';
- B. Adopting the following stepped housing target:

	Plan Period		
Financial Year	2020/21 - 26/27	2027/28 - 28/29	2029/30 - 34/35
Annual Requirement	1,264	1,594	2,494

**Table 8.1 Stepped housing target**

- C. Adopting a strategic target for 50% of all new homes to be genuinely affordable across the Plan Period (see Policy 13 'Delivering Genuinely Affordable Housing');
- D. Maximising opportunities to increase the supply of homes on all suitable, appropriate and available sites including developing brownfield land, surplus public sector land and encouraging appropriate residential intensification;
- E. Making effective and efficient use of land by seeking to optimise housing densities;
- F. Ensuring new homes address different housing needs and provide a variety of housing choices;
- G. Supporting the regeneration and renewal of appropriate housing estates, working with housing association partners where necessary;
- H. Supporting new homes to be developed on small sites to contribute to meeting housing need (see Policy 19 'Small Sites'); and
- I. Resisting the unjustified net loss of residential accommodation.

**8.4** The GLA Strategic Housing Land Availability Assessment (SHLAA) and Waltham Forest's Growth Capacity Study 2018 show the borough has enough capacity to deliver new homes. These assessments demonstrate that Strategic Locations across the borough have significant capacity for new homes by making effective use of land, intensification and increased density. Such opportunities will be explored through Area Supplementary Planning Documents (SPD), Masterplans and Planning Briefs, as set out in 'Waltham Forest's Spatial and Growth Strategy'. Sites across the borough suitable for new homes will be listed on

Waltham Forest's Brownfield Land Register. The Brownfield Land Register will enable Waltham Forest to have up to date and consistent information on sites for new homes, maintained in a transparent way through publishing as open data.

**8.5** The Housing Trajectory illustrates the expected rate of housing delivery over the Plan Period. In considering when sites will be delivered in the Plan, the Housing Trajectory has been informed by the Waltham Forest Growth Capacity Study and site feasibility work. A stepped housing requirement is appropriate for Waltham Forest, as there is a significant change in the level of housing requirement between emerging and previous policies, and several large sites which will be delivered in phases.

**8.6** The housing requirement is set at 1,264 for the seven (financial) years from 2020/21 to 2026/27, in line with the the 10-year minimum target set out in the London Plan for Waltham Forest. Based on local evidence, it then increases to 1,594 in 2027/28 and 2028/29 and again to 2,494 for the six years to 2034/35.

**8.7** The delivery of the sites will be monitored in Waltham Forest's Authority Monitoring Report (AMR) and Waltham Forest's Housing Delivery Test Action Plan (HDTAP).

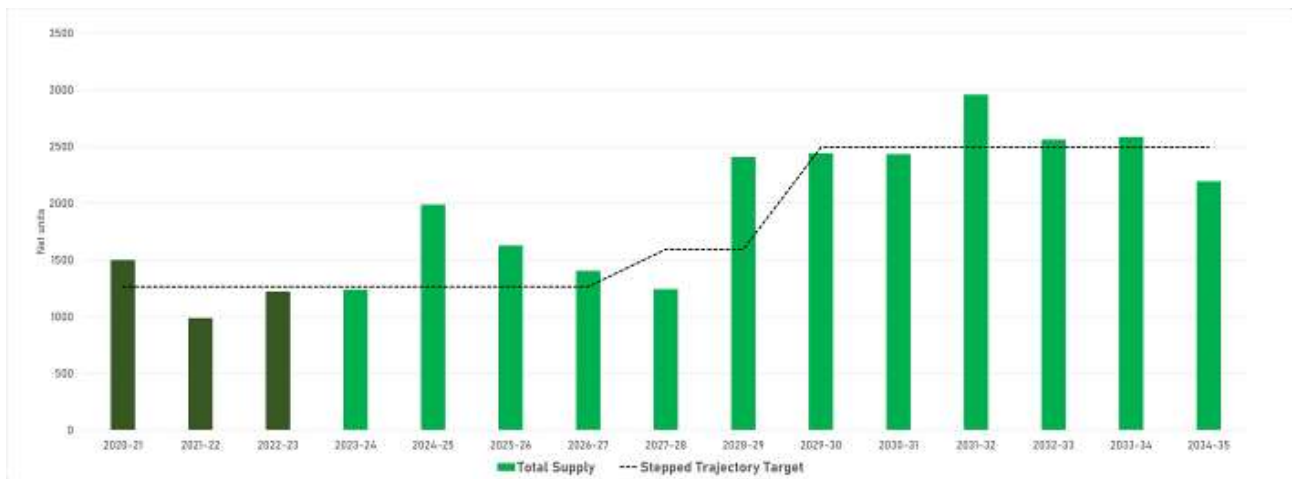


Figure 8.3 Housing trajectory

**8.8** Genuinely affordable housing is homes which meet the needs of households whose incomes are not sufficient to enable them to buy or rent housing on the open market. Waltham Forest has a high level of affordable housing need. The Strategic Housing Market Assessment (SHMA) has estimated that the need for the borough is 71%. Given the significant level of need and the difficulties local residents have in accessing the housing market, Waltham Forest seeks to prioritise the delivery of affordable housing and has set a strategic affordable housing target of 50% across the Plan Period, and the approach to this is set out in Policy 13 'Delivering Genuinely Affordable Housing'.

**8.9** In meeting housing need, opportunities to maximise available sites appropriate for housing will be encouraged through optimising housing densities, encouraging residential intensification, supporting the development of small sites, developing surplus public sector land and considering appropriate estate regeneration and infill. The unjustified net loss of residential accommodation will be resisted.

## Policy 13

### Delivering Genuinely Affordable Housing

The delivery of 50% of all new homes to be genuinely affordable housing will be achieved by:

- A. Requiring all development of 10 or more homes to deliver affordable housing;
- B. Working with the Mayor of London to use grant funding to increase affordable housing delivery beyond the level that would otherwise be provided;
- C. Adopting a threshold approach to viability. Where proposals meet the following criteria, they will not be required to provide a viability assessment at application stage:
  - i. Meet or exceed the threshold level of affordable housing on site without public subsidy. These thresholds are set at:
    - a. A minimum of 35%; or
    - b. 50% for public sector land where there is no portfolio agreement with the Mayor; or
    - c. 50% for Industrial Land (SIL, LSIS, BEA, and non-designated) where the scheme would result in a net loss of industrial capacity.
  - ii. Are consistent with the Council's tenure split (see Policy 14 'Affordable Housing Tenure');
  - iii. Demonstrate that they have sought grant to increase the level of affordable housing;
  - iv. Are subject to a Section 106 agreement with Early Stage Viability Review, triggered if an agreed level of progress on implementation is not made within two years of the permission being granted (or an alternative period agreed by the Council);
- D. Requiring proposals which do not meet the criteria in Part C to follow the Viability Tested Route and submit detailed supporting viability evidence to ascertain the maximum viable level of affordable housing which can be delivered. Where required, viability assessments will be undertaken in line with the Mayor's Affordable Housing and Viability SPG. These schemes will be subject to:
  - i. Early Stage Viability Review if an agreed level of progress on implementation is not made within two years of the permission being granted;
  - ii. Mid Term Reviews prior to implementation of phases for larger phased schemes; and
  - iii. A Late Stage Viability Review which is triggered when 75 per cent of the homes in a scheme are sold or let (or an alternative period agreed by the Council);
- E. Delivering affordable housing on site, other than in exceptional circumstances where off-site or payment-in-lieu would secure better outcomes in meeting the borough's housing need; and



F. Seeking affordable housing contributions from alternative housing products (see Policy 18 'Other Forms of Housing').

**8.10** Genuinely affordable homes are defined as homes for Social Rent, London Affordable Rent, London Living Rent and London Shared Ownership. Other affordable housing products may be acceptable if, as well as meeting the NPPF definition of affordable housing, they also meet the London Housing Strategy definition of genuinely affordable housing.

- Social Rent and London Affordable Rent are for households on low incomes where rent levels are based on the formulas in the Social Housing Regulator's Rent Standard Guidance. London Affordable Rent homes are capped at a benchmark levels published by the GLA.
- London Shared Ownership is an intermediate ownership product which allows first time buyers to purchase a share in a new home and pay a low rent on the remaining, unsold, share.

**8.11** The percentage of affordable housing on a scheme is to be measured in both habitable rooms and homes, with the habitable room measurement to be used with reference to Part C of Policy 13 'Delivering Genuinely Affordable Housing' to determine whether the threshold has been met.

**8.12** Affordable housing will be first sought on-site and opportunities to deliver this will be maximised. However, in exceptional circumstances which can be demonstrated, affordable housing may be allowed to be delivered off-site on another site, or a donor site, where this is not possible, a payment in lieu may be acceptable. Further detail on these circumstances and calculations will be provided in an update to the Affordable Housing and Viability Supplementary Planning Document (SPD).

**8.13** Affordable housing contributions will be sought on alternative housing products such as Build to Rent, Purpose Built Shared Housing, and Purpose Built Student Housing in line with the London Plan (2021).

**8.14** The policy should be read alongside relevant policies in the London Plan (2021), including but not exclusively Policy H4 'Delivering affordable housing' and Policy H5 'Threshold approach to applications'.

**8.15** Further detail regarding the application of Policy 13 'Delivering Genuinely Affordable Housing' and guidance for applicants will be provided in an update to the Affordable Housing and Viability Supplementary Planning Document (SPD).



Decent Homes for Everyone

**Policy 14**

**Affordable Housing Tenure**

The following affordable housing tenure split will be expected on schemes of 10 or more homes:

Tenure	Split
Low cost affordable rent	70%
Intermediate housing products	30%

**Table 8.2 Affordable housing tenure split**

**8.16** London Plan (2021) Policy H6 'Affordable housing tenure' states that residential development should apply a split of:

- a minimum 30% low cost rented homes; and
- a minimum 30% intermediate homes.

**8.17** Both the GLA Strategic Housing Market Assessment (SHMA) and Waltham Forest SHMA show that there is a significant need for low cost rental housing. Because of this, the remaining 40% affordable housing tenure in Waltham Forest is expected to be for low cost rented homes. Delivery of low-cost rental housing will be the priority other than in exceptional circumstances.

**8.18** There is however still a strong need for intermediate housing products which is also reflected in the policy. To follow the 'Fast Track Route' set out under Part C of Policy 13 'Delivering Genuinely Affordable Housing', applicants will be expected to follow this tenure split in line with London Plan (2021) Policy H5 'Threshold approach to applications'.

**Policy 15**

**Housing Size and Mix**

A diverse range of housing will be supported by:

A. Providing the following mix of dwelling sizes across all tenures:

Bedroom Size	1 bed	2 bed	3 bed plus
Preferred dwelling mix – Social Rent / London Affordable Rent	20%	30%	50%
Preferred dwelling mix – Intermediate Rent	20%	40%	40%
Preferred dwelling mix - Intermediate Ownership	30%	50%	20%
Preferred dwelling mix - Market	20%	50%	30%

**Table 8.3 Dwelling mix**

B. Allowing variations to the dwelling size mix where it can be fully justified based on the tenures and type of housing proposed, site location, area characteristics, design constraints, scheme viability; and where shared ownership is proposed, the ability of potential occupiers to afford the homes proposed.



**8.19** Ensuring a selection of housing types and tenures are built is important to Waltham Forest to meet the housing needs of its diverse population. There is a need for a range of dwelling sizes and tenures. The priorities for dwelling size and tenures are based on the Strategic Housing Market Assessment (SHMA) and the borough's housing waiting list.

### Policy 16

#### Accessible and Adaptable Housing

Developments will be expected to provide high quality, accessible homes by:

- A. Encouraging functional, adaptable and accessible spaces design in all housing developments;
- B. Expecting all self-contained homes to meet the nationally described space standard, at a minimum;
- C. Requiring all new-build self-contained homes to be accessible and adaptable in line with Building Regulation M4(2); and
- D. Requiring a minimum of 10% of new-build, self-contained homes to be suitable for occupation by a wheelchair user or easily adapted for occupation by a wheelchair user in accordance with Building Regulation M4(3).

**8.20** It is important to ensure that new housing is accessible to all and is adaptable to the changing needs of residents throughout their lives. Housing developments which consider inclusive design and accessibility issues at an early stage and throughout the development process are the most successful at achieving this. Accessible housing allows residents of the borough to live dignified and independent lives. Wheelchair user dwellings should be distributed throughout a development to provide a range of aspects, floor level locations, views and unit sizes. This policy should be read in-conjunction with London Plan (2021) Policy D7 'Accessible housing'.

### Policy 17

#### Redevelopment and Intensification of Existing Housing Estates

Redevelopment and appropriate intensification of existing housing estates will be supported where:

- A. It leads to an increase in the overall supply of new homes including genuinely affordable homes;
- B. Any loss of housing will be replaced by new housing at existing or higher densities with at least the equivalent level of overall floorspace including affordable housing; and
- C. It increases the design standards, quality, accessibility and safety of the existing housing.

**8.21** The redevelopment and intensification of existing housing and housing estates, particularly those that are poorly laid-out and of lower density, is critical in meeting the borough's housing needs. It is important that such schemes increase the number of homes, ensure that affordable homes are not lost and provide a range of tenures. There are opportunities also to increase the standards of the homes in their design, accessibility and safety, as well as improving the environmental quality of the local area. This policy should be read in conjunction with other policies in this Chapter and in 'Creating High Quality Places'.

**Policy 18**

**Other Forms of Housing**

Schemes for other forms of housing will be supported where:

- A. They meet the definitions of Build to Rent, Purpose-Built Student Accommodation or Purpose-Built Shared Living (see Table 8.4);
- B. They contribute towards mixed, balanced and inclusive neighbourhoods and communities;
- C. They are located in areas of good transport accessibility and are well connected to local services and amenities;
- D. They contribute to the delivery of affordable housing, in line with the London Plan;
  - i. Build to Rent – adopting the threshold approach set out in Policy H11 'Build to Rent' of the London Plan;
  - ii. Purpose-Built Student Housing – adopting the threshold approach set out in Policy H15 'Purpose-built student accommodation' of the London Plan;
  - iii. Purpose Built Shared Living – as a payment in lieu, adopting the approach set out in Policy H16 'Large-scale purpose-built shared living' of the London Plan;
- E. They are of high-quality design including size of homes and accessibility.

**8.22** Non-traditional housing can make a positive contribution to providing a wider range of housing choices for residents, meeting identified needs and contributing to increasing housing supply. Waltham Forest defines non-traditional housing as Build to Rent, Purpose-Built Student Accommodation and Purpose-Built Shared Living. The definitions of these are provided in Table 8.4 below.

Non-Traditional Housing Type	Definition
Build to Rent	<ul style="list-style-type: none"> <li>• The development, or block or phase within the development, has at least 50 homes.</li> <li>• Homes are held as Build to Rent under a covenant for at least 15 years.</li> <li>• A clawback mechanism is in place that ensure there is no financial incentive to break the covenant.</li> </ul>

Non-Traditional Housing Type	Definition
	<ul style="list-style-type: none"> <li>• All homes are self-contained and let separately.</li> <li>• There is unified ownership and unified management of the development and longer tenancies (three years or more) are available to all tenants. These should have break clauses for renters, which allow the tenant to end the tenancy with a month’s notice any time after the first six months.</li> <li>• The scheme offers rent and service charge certainty for the period of the tenancy, the basis of which should be made clear to the tenant before a tenancy agreement is signed, including any annual increases which should always be formula-linked.</li> <li>• There is on-site management, this does not necessarily mean full-time dedicated on-site staff, but all schemes need to have systems for prompt resolution of issues and some daily on-site presence.</li> <li>• Providers have a complaints procedure in place and are a member of a recognised ombudsman scheme.</li> <li>• Providers do not charge up-front fees of any kind to tenants or prospective tenants, other than deposits and rent-in-advance.</li> </ul>
Purpose Built Student Accommodation	<ul style="list-style-type: none"> <li>• Primarily occupied by students and managed by an education institution or independent provider for that purpose.</li> <li>• To be let only to students and dependents during term-time.</li> <li>• Let to each student for the full duration of all terms in the academic year, and not less than the full duration of one term.</li> <li>• Provides some common/communal facilities and/or services.</li> </ul>
Purpose Built Shared Living	<ul style="list-style-type: none"> <li>• Communal facilities and services are provided that are sufficient to meet the requirements of the intended number of residents and include at least:             <ul style="list-style-type: none"> <li>• convenient access to a communal kitchen;</li> <li>• outside communal amenity space (roof terrace and/or garden);</li> <li>• internal communal amenity pace (dining rooms, lounges);</li> <li>• laundry and drying facilities;</li> <li>• a concierge;</li> <li>• community management; and</li> <li>• bedding and linen changing and/or room cleaning services.</li> </ul> </li> <li>• Tenancies for a minimum of 3 months.</li> <li>• Under single management, with a management plan provided.</li> </ul>

Table 8.4 Types of non-traditional housing

**8.23** It is important that these non-traditional housing schemes are located near services and transport. In addition, the delivery of these types of new homes should not lead to a reduction in the quality of accommodation and such schemes will be expected to be of high quality. This policy should be read alongside London Plan (2021) Policies H11 'Built to Rent', H15 'Purpose-built student accommodation' and H16 'Large-scale purpose-built shared living'.

## Policy 19

### Small Sites

Residential-led proposals for the development of well-designed new homes on small sites will generally be supported. In particular, proposals will be supported where they:

- A. Seek to infill, intensify and re-model areas of existing housing;
- B. Encourage innovative approaches to housing delivery;
- C. Support residential intensification within 800 metres of a designated centre with good public transport accessibility; and
- D. Are identified on the Brownfield Land Register.

**8.24** Small sites will play an important part in meeting the borough's housing needs and target. Increasing the rate of housing delivery from small housing sites is a priority. Small sites are defined as those below 0.25ha. The delivery of small sites will be achieved through incremental intensification of existing residential areas and town centres, or in areas with adequate public transport accessibility, which is considered to be PTAL 3 to PTAL 6. Additional guidance in the form of Design Codes and Supplementary Planning Documents (SPDs) may be produced to assist with the accelerated delivery of such sites.



**Policy 20****Housing in Multiple Occupation and Conversions**

- A. The conversion of a larger home(s) to smaller self-contained homes (C3), Houses in Multiple Occupation (HMO) (C4) and Buildings in Multiple Residential Occupation (Sui Generis) will not be allowed where:
- i. The house has a gross original internal floor space of less than 124sqm; or
  - ii. The proposal will result in the over concentration of HMO conversions in one street or in the wider local area.

**Conversions**

- B. The conversion of homes with a gross original internal floorspace of more than 124sqm to smaller self-contained homes will only be permitted where the proposed development:
- i. Provides at least one larger family sized home of 74sqm (3 bed plus);
  - ii. Meets the minimum space standards in Table 14.2 'Minimum internal space standards for new dwellings';
  - iii. Meets high-quality design standards (Policy 53 'Delivering High Quality Design' and Policy 57 'Amenity');
  - iv. Does not propose additional on-site parking beyond existing provision unless justified by a Transport Assessment in line with Policy 66 'Managing Vehicle Traffic';
  - v. Makes provision for adequate cycle parking on-site (Policy 61 'Active Travel');
  - vi. Is close to public transport (PTAL 3 and above);
  - vii. Provides good refuse and storage facilities (Policy 57 'Amenity' and Policy 93 'Waste Management'); and
  - viii. Makes appropriate provision for outdoor or amenity space (Policy 56 'Residential Space Standards').

**Houses in Multiple Occupation**

- C. The conversion of homes that have a gross original internal floorspace of more than 124 sqm into HMOs will only be permitted where the proposed development:
- i. Meets the minimum space standards for room sizes in Tables 8.5 and 8.6;
  - ii. Does not propose additional on-site parking beyond existing provision unless justified by a Transport Assessment in line with Policy 66 'Managing Vehicle Traffic';
  - iii. Makes adequate provision for on-site cycle parking (see Policy 61 'Active Travel');
  - iv. Is close to public transport (PTAL 3 and above);

- v. Provides suitable refuse and storage facilities (see Policy 57 'Amenity' and Policy 93 'Waste Management');
- vi. Makes appropriate provision for outdoor or amenity space (see Policy 56 'Residential Space Standards').

Number of occupiers	Room for sleeping (Kitchen facilities in a separate room)	Room for sleeping (Kitchen facilities within the room)	Bedrooms in shared houses with communal living room
1	11 sqm	16 sqm	10 sqm
2	18 sqm	22 sqm	16 sqm

**Table 8.5 Minimum bedroom sizes in HMO and Buildings in Multiple Occupation**

Number of sharers	Kitchen	Combined Living Room/Kitchen	Living room (dining facilities in another room)
Up to 4	12 sqm	18.5 sqm	15 sqm
5	13 sqm	20.5 sqm	16 sqm
6	14 sqm	22.5 sqm	17 sqm
7 or more	15 sqm + 1 sqm for each additional occupier	22.5 sqm + 2 sqm for each additional occupier	18 sqm + 1 sqm for each additional occupier

**Table 8.6 Minimum kitchen and living room sizes in HMOs and Buildings in Multiple Occupation**

\*Calculations exclude floorspace for bathrooms/shower rooms.

**8.25** HMOs comprise of shared dwelling houses or flats occupied by between 3 to 6 unrelated individuals who share basic facilities. HMOs can form an important part of the housing stock, if they are of high-quality design, provide good quality living standards and adequate space for people to live in. These developments are expected to be located near or in town centres, as well as near public transport. However, all too often this is not the case and the Council has enforced against many poor quality HMOs and will continue to do so.

**8.26** The Council has an Article 4 Direction in place relating to development comprising a change of use from Class C3 (dwellinghouses) of the Town and Country (Use Classes) Order 1987 (as amended) to Class C4 (houses in multiple occupation). This removes permitted development rights for a change of use from Class C3 to Class C4. The Article 4 Direction applies to the whole borough.

**8.27** In assessing the extent of over-concentration of HMOs or whether conversion activity in a particular area or street has reached saturation levels, the Council will have regard to the number of HMOs and conversions that have already taken place or been granted planning permission and the cumulative impact of allowing additional HMOs or conversions. In assessing the likely impact of additional permissions, residents' concerns will be gathered through the planning application consultation process, along with information from the Council's records on complaints and service delivery issues related to street cleaning/rubbish collection, parking, noise and general nuisance.

## Policy 21

### Supported and Specialist Accommodation

Supported and specialist accommodation will be supported by:

- A. Encouraging the retention and refurbishment of supported and specialist accommodation where it meets identified need and is of appropriate design quality; and
- B. Requiring new supported and specialist developments to:
  - i. Be of high quality design, meeting the requirement(s) of a specific user or group;
  - ii. Meet the definition of supported housing and specialist accommodation;
  - iii. Meet identified housing needs;
  - iv. Be well connected to facilities, social infrastructure and health care; and
  - v. Be well served by public transport.
- C. Resisting the unjustified loss of supported and specialist accommodation unless it can be demonstrated that there is a surplus of that form of accommodation in the area and that it is no longer required; and
- D. Supporting proposals where it can be demonstrated that the existing accommodation is incapable of meeting contemporary standards of care and the existing accommodation will be adequately re-provided to an equivalent or greater standard in the area.

**8.28** Supported and Specialist accommodation is required to meet the needs of older, disabled, and vulnerable people in the borough. The London Plan (2021) identifies an indicative benchmark figure of 110 dwellings per annum for Waltham Forest. Retention and refurbishment will be supported where it still meets the needs of residents and is of appropriate design quality for current and/or future residents. For new developments, proposals must meet identified need, be of high-quality design and be located in areas that have the facilities the residents require and be located close to public transport.

8.29 Supported and Specialist housing may be self-contained or non-self-contained and can include:

Supported and Specialist Accommodation	Definition
Sheltered Accommodation (also referred to as supported housing)	<ul style="list-style-type: none"> <li>• Self-contained accommodation for people who require no or a low level of support.</li> <li>• Schemes normally include additional communal facilities such as a residents' lounge and a scheme manager, warden or personal alarm/telecare system.</li> </ul>
Extra care accommodation (also referred to as assisted living, close care, continuing care housing)	<ul style="list-style-type: none"> <li>• Self-contained residential accommodation and associated facilities with additional care support for residents who may be less independent.</li> <li>• Aimed at older people or younger people with particular care needs.</li> <li>• A range of facilities are normally available such as a residents' lounge, laundry room, a restaurant or meal provision facilities, classes, and a base for health care workers. Domiciliary care will be available to varying levels, either as part of the accommodation package or as additional service which can be purchased if required.</li> </ul>
Residential nursing care accommodation (including end of life/hospice care, nursing care homes and dementia care home accommodation)	<ul style="list-style-type: none"> <li>• Provides non-self-contained residential accommodation for people for whom additional personal or nursing care is essential.</li> <li>• Rooms may be private or shared and may provide an en-suite bathroom.</li> <li>• Communal facilities are likely to include a dining room and residents' lounge, with meals and personal services routinely provided to all residents.</li> <li>• Personal or nursing care is a critical part of the accommodation package at residential/nursing care accommodation.</li> </ul>

Table 8.7 Types of support and specialist accommodation

**Policy 22****Gypsies and Travellers and Travelling Showpeople**

Gypsies and Travellers' identified needs up to 2033 for up to nine additional pitches will be met by:

- A. Protecting the existing provision of pitches for Gypsies and Travellers at Folly Lane and Hale Brinks North; and
- B. Supporting intensification of existing sites to provide extra pitches at Folly Lane and Hale Brinks North in line with the need set out in the Gypsies and Travellers' Needs Assessment. Any new site or substantial alteration to an existing site shall:
  - i. Provide satisfactory layout and facilities in terms of pitches, plots, hardstanding, parking, turning space, amenity blocks, storage and maintenance areas, open space and play areas;
  - ii. Be capable of connection to energy, water and sewage infrastructure;
  - iii. Be accessible to public transport, services and facilities, and be capable of support by local social infrastructure; and
  - iv. Provide safe access to and from the road network.

**8.30** There are two Gypsy and Traveller sites in the borough; one at Folly Lane and another at Hale Brinks North. A Gypsy and Travellers' Needs Assessment was commissioned to understand the level of need in the borough. The assessment identified a requirement for two pitches under the national definition and up to nine additional pitches using the (at the time) Intend to Publish London Plan definition. The Intend to Publish London Plan definition was wider than the Planning Policy for Travellers Sites definition and is considered to apply in Waltham Forest. The additional nine pitches identified are expected to be met by intensification of the existing sites.

**Policy 23****Community Housing**

Schemes for community-led housing, self-build and custom build housing projects will be supported by ensuring:

- A. Proposals meet the definition of community-led housing, self-build and custom build housing projects;
- B. Proposals meet identified housing needs; and
- C. Proposals make the best use of land by bringing forward redevelopment of small sites, infill development or as part of estate regeneration schemes and larger redevelopments.

**8.31** Community-led housing, self-build and custom build housing can assist in meeting the borough's housing need and in providing a wide range of housing choices. Such schemes will be supported and encouraged on small sites or as part of estate regeneration and, where appropriate, as part of larger developments. Waltham Forest has a statutory duty to have a self-build register and allows residents to not only register their interest to for self build and custom build plots but also to put themselves forward for development of community-led housing. Definitions are stated in Table 8.7 below.

Type	Definition
Community-Led Housing	<p>Schemes that are genuinely community-led all share three common principles:</p> <ul style="list-style-type: none"> <li>• Meaningful community engagement and consent throughout the development process (communities do not necessarily have to initiate the conversation, or build homes themselves);</li> <li>• Presumption that the community group or organisation will take a long-term formal role in the ownership, stewardship or management of the homes;</li> <li>• The benefits of the scheme to the local area and/or specified community group are clearly defined and legally protected in perpetuity.</li> </ul>
Self-Build and Custom Build	<p>Where an individual, an association of individuals, or persons working with or for individuals or associations of individuals build or complete houses to be occupied as homes by those individuals.</p>

**Table 8.8** Types of community housing

**Implementation**

**8.32** The main tools the Council has in delivering the policies in this section of the Plan are the:

- Planning application process;
- Affordable Housing and Viability Supplementary Planning Document (SPD);
- Developer Contributions Supplementary Planning Document (SPD); and
- Section 106 legal agreements.

**8.33** Additionally, affordable housing grant from the GLA, the Council's Capital Delivery Programme and the Council-owned housing development company - Sixty Bricks - all play an important role in delivering housing and affordable housing.



## Building a Resilient and Creative Economy

### Strategic Objectives

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 indigenous growth and attracting inward investment.

Improve life chances by improving job opportunities, upskilling residents and providing access to new skills, training and apprenticeship opportunities.

**9.1** Waltham Forest is in the midst of a transformative economic change consisting of strong economic growth, a growing population and a thriving creative and cultural scene. This change brings positive developments comprising new people, businesses and regeneration. However, policies in this chapter of the Local Plan have been prepared at a time of uncertainty associated with the Covid-19 pandemic. The full effects of the pandemic on employment and employment floorspace requirements are not yet known. These policies will be monitored and reviewed where necessary.

**9.2** According to the Employment Land Study (2019), Waltham Forest's economy is shifting away from a traditional industrial and manufacturing base to towards a more diverse range of activities driven by creative and digital entrepreneurs, and a corresponding significant increase in the number of micro and small businesses locating and growing in the borough.

**9.3** Prior to COVID-19, Waltham Forest was successfully transitioning from a low employment to a high employment borough, with the proportion of the population in employment exceeding the London and Great Britain average. The number of new business registrations grew by 98% between 2011-2018, compared to the London average of 58.5%. The median weekly pay of residents is well above the national average, at £680 per week, and is converging with the London average.<sup>(4)</sup> However, in 2018-19, 5% of residents were unemployed, ranking it 10th highest out of London's 33 Boroughs.

**9.4** Prior to COVID-19, Waltham Forest's thriving economy was composed of diverse employment sectors. Recognising this, the Waltham Forest Economic Growth Strategy 2015-2020 identified key sectors within the borough to 'keep, seed and grow'.<sup>(5)</sup> These sectors are:

- Digital and creative industries
- Construction
- Professional and urban services
- Manufacturing

4 ONS annual survey of hours and earnings - resident analysis  
[https://www.nomisweb.co.uk/reports/lmp/la/1946157278/subreports/asher\\_time\\_series/report.aspx?](https://www.nomisweb.co.uk/reports/lmp/la/1946157278/subreports/asher_time_series/report.aspx?)

5 Economic Growth Strategy 2015 -2020

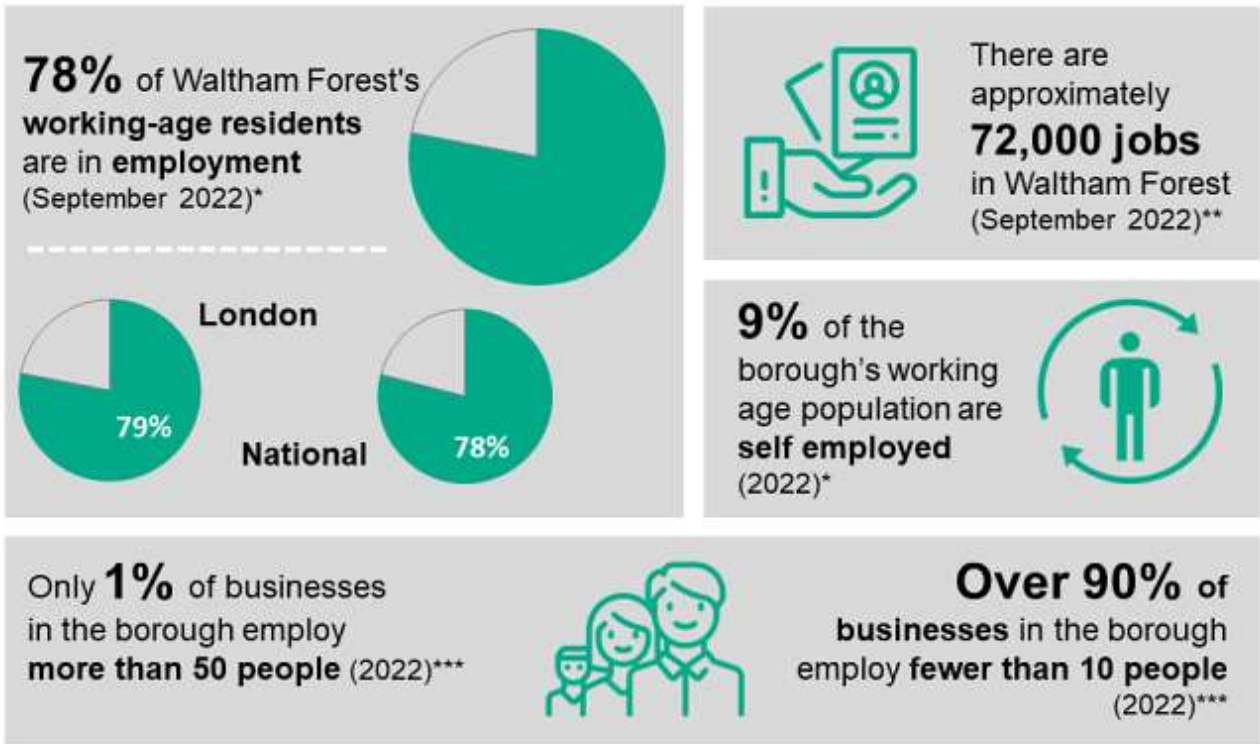
- Retail
- Health and social care

**9.5** The digital and creative sectors have flourished in the borough over the last decade, partially due to the migration of businesses from other London boroughs. In recognition of this, a Local Creative Enterprise Zone (CEZ) has been designated in Blackhorse Lane (see Policy 37 'Blackhorse Lane Creative Enterprise Zone').

**9.6** Waltham Forest's Employment Land Study (2019) has identified an objectively assessed need for 8,100 jobs equating to 52,000 sqm of employment floorspace (identified as B2, B8 and Class E Part G i, ii, iii uses) over the Plan Period. The Employment Land Audit (2021) demonstrates that this objectively assessed need can be delivered through efficient and effective use of existing employment sites.

**9.7** The need for different uses is identified as:

- 18,848sqm of office space (Class E Part G i / ii)
- 36,604sqm of distribution space (B8)
- - 4,215sqm of industrial space (Class E Part G iii / B2)



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

Figure 9.1 Workers in Waltham Forest

## Policy 24

### Supporting Economic Growth and Jobs

Opportunities for employment growth in Waltham Forest will be maximised to ensure there is sufficient capacity to deliver a minimum of 52,000sqm of additional employment floorspace across the borough, and protect the borough's Strategic Industrial Location (SIL) capacity over the Plan Period by:

- A. Focusing the delivery of new Class E Part G iii, B2 and B8 floorspace in Strategic Industrial Locations (SIL), Locally Significant Industrial Sites (LSIS) and non-designated employment sites;
- B. Focusing the delivery of Class E Part G i and ii floorspace in Borough Employment Areas (BEA) and designated Town Centres;
- C. Supporting the delivery of a range of employment typologies in suitable locations across the borough:
  - i. Distribution uses – storage and distribution floorspace (B8) in locations within good proximity of the strategic road network;
  - ii. Industrial Space – light industrial uses (Class E, Part G iii) and the production and distribution of goods (B2) in smaller or sub-divided space within the borough's designated industrial sites; and
  - iii. New London Mix – high density office space (Class E Part G i and ii) ranging from small studio space, flexible co-working spaces to large offices in BEA and designated town centres; and
- D. Promoting industrial intensification through site allocations in Local Plan Part 2 - Site Allocations, the Industrial Intensification Supplementary Planning Document (SPD) and the subsequent development of industrial masterplans (in line with Policy 29 'Industrial Masterplan Approach' and London Plan Policy E7 'Industrial intensification, co-location and substitution') to facilitate the intensification and uplift of industrial capacity and the maintenance of existing SIL capacity.

**9.8** In line with the London Plan, the 52,000sqm additional floorspace is expected to be delivered through intensification and consolidation across existing employment areas. These are the designated employment areas of Strategic Industrial Locations (SIL), Locally Significant Industrial Sites (LSIS) and Borough Employment Areas (BEA). The Employment Land Audit (2021) demonstrates that it is possible to achieve this level of increase. The following policies on the management of SIL, LSIS, BEA and Non-Designated Employment Land set out how this can be delivered. Town Centres are also a good location for offices and light industrial uses, as they are well connected and have facilities that workers may want to be close to, as well as the possibility of attracting local customers.



**9.9** The Employment Land Study (2019) states that the focus should be on a range of typologies to meet future demand and need. These comprise distribution uses related to logistics, industrial space, and the New London Mix. Distribution space will be directed to areas across the borough which have good access to the strategic road network. New London Mix will be supported in BEAs and designated town centres, and this policy should be read in line with Policy 31 'Workspaces', Policy 32 'Affordable Workspace' and Policy 39 'New Retail, Office and Leisure Developments'.

**9.10** To deliver on the objectively assessed economic needs of the Plan, development of industrial capacity should be guided to the most suitable locations. The largest identified need for economic purposes is for B8 floorspace to support the logistics and distribution sectors. This need amounts to an additional c. 36,500sqm of floorspace to be provided.




**9.11** In Waltham Forest there are two broad areas which contain sites which can best meet these requirements. The first is the North Circular Strategic Location, which benefits from connectivity to the A406 North Circular Road, and large, relatively consolidated land ownership. The second is in the south of the borough, around the Lea Bridge and Leyton Strategic Locations, which have excellent strategic road network connectivity provided by the A12 and proximity to Central London. As the most suitable, well-located and sustainable locations for the delivery of new and additional floorspace for distribution and servicing, development proposals should seek to optimise the capacity which these sites present when preparing masterplans and planning applications.

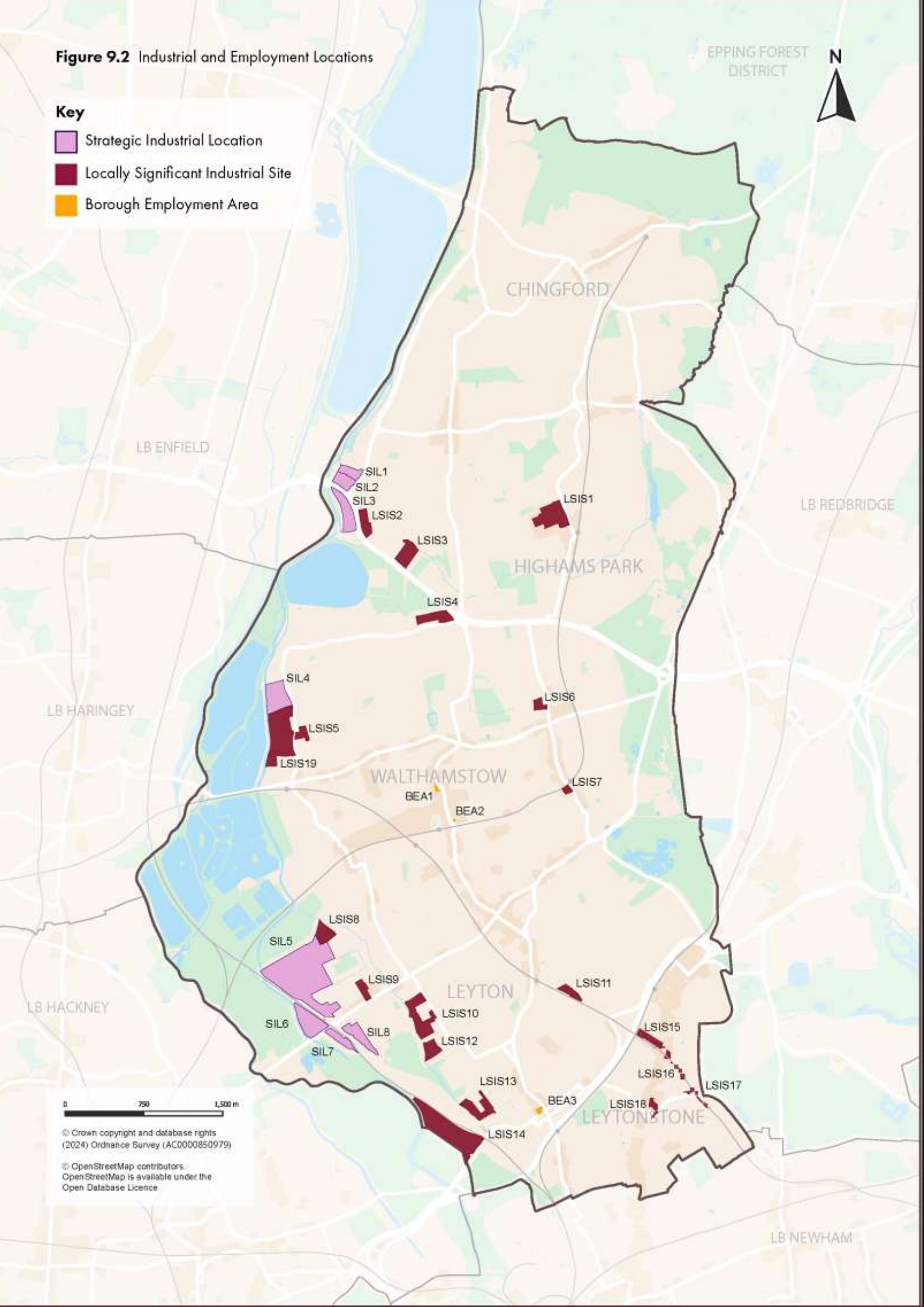
**9.12** The role of Local Plan Part 2 - Site Allocations will be to establish the capacity which is required to be provided on specific sites in order to meet the borough's SIL-type/B8 industrial land needs. The viability and deliverability of industrial supply (to meet additional B8 floorspace and re-provision for any loss) will be ensured through Local Plan Part 2 - Site Allocations, the Industrial Intensification Supplementary Planning Document (SPD) and a tailored monitoring arrangement to track progress.

**9.13** Any development proposals on SIL will be required to ensure that the supply of floorspace which is protected as SIL is maintained, and where possible increased. Proposals for masterplans involving the intensification and consolidation of SIL will be required to ensure that the SIL capacity is at minimum maintained, and should also wherever possible deliver an uplift in terms of overall industrial capacity. Any such proposals will be reflected in the next Development Plan Document (DPD) to be submitted.

**Figure 9.2** Industrial and Employment Locations

**Key**

-  Strategic Industrial Location
-  Locally Significant Industrial Site
-  Borough Employment Area



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**Policy 25****Safeguarding and Managing Change in Strategic Industrial Locations**

To safeguard and manage land in Strategic Industrial Locations (SIL):

A. The following uses are acceptable:

- i. Light industrial (Class E Part G iii);
- ii. General industry (Class B2);
- iii. Storage or distribution (Class B8);
- iv. Waste management, secondary materials, and aggregates (Class B2 / B8 / Sui Generis);
- v. Utilities infrastructure (such as energy and water);
- vi. Land for sustainable transport functions including intermodal freight interchanges, rail and bus infrastructure;
- vii. Wholesale markets;
- viii. Emerging industrial-related sectors;
- ix. Flexible hybrid space (Class E Part G iii / B2 / B8);
- x. Low cost industrial and related space for Small and Medium Enterprises (SMEs);
- xi. Research and development of industrial and related products or processes; and
- xii. Uses ancillary to the above;

B. New development will be supported on SIL where it:

- i. Provides improved high-quality, fit for purpose industrial space and infrastructure;
- ii. Allows for future flexibility, including future subdivision and/or amalgamation for a range of employment uses; and
- iii. Provides either the full replacement or the intensification of existing industrial capacity. Landowners should, where appropriate, work with landowners of adjacent sites in order to make the most efficient use of land.



**9.14** Strategic Industrial Locations (SIL) are the capital's main reservoirs of industrial land and are of strategic economic importance for London, and as such will be safeguarded. Industrial and distribution uses (Class E Part G iii, Class B2 and Class B8) are the main focus for these areas. Over the years, Waltham Forest has lost some of its industrial land to other uses; the remaining industrial land is therefore critical to the borough's economic success and any new development in the SIL should not lead to any overall loss of industrial floorspace.

**9.15** Renewal and upgrade of employment space to ensure it is high quality and fit for purpose is important. Such proposals will be supported especially where they allow for future flexibility, including both subdivision and amalgamation, as required, to meet needs.



**Policy 26****Safeguarding and Managing Change in Locally Significant Industrial Sites**

To safeguard and manage land in Locally Significant Industrial Sites (LSIS):

A. The following uses are acceptable:

- i. Light industrial (Class E Part G iii);
- ii. General industry (Class B2);
- iii. Storage or distribution (Class B8);
- iv. Waste management, secondary materials, and aggregates (Class B2 / B8 / Sui Generis);
- v. Utilities infrastructure (such as energy and water);
- vi. Land for sustainable transport functions including intermodal freight interchanges, rail and bus infrastructure;
- vii. Wholesale markets;
- viii. Emerging industrial-related sectors;
- ix. Flexible hybrid space (Class E Part G iii / B2 / B8);
- x. Low cost industrial and related space for Small and Medium Enterprises (SMEs);
- xi. Research and development of industrial and related products or processes; and
- xii. Uses ancillary to the above;

B. New development will be supported on LSIS, where it:

- i. Provides improved high-quality, fit for purpose industrial space and infrastructure; and
- ii. Allows for future flexibility, including future subdivision and /or amalgamation for a range of employment uses; and
- iii. Provides either the full replacement or the intensification of existing industrial capacity. Landowners should, where appropriate, work with landowners of adjacent sites in order to make the most efficient use of land; or
- iv. Successfully delivers intensified industrial floorspace capacity through co-location of industrial and non-industrial uses, as identified through an industrial masterplanning process in line with Policy 29 'Industrial Masterplan Approach'.

**9.16** Locally Significant Industrial Sites (LSIS) are important to the local economy. LSIS are predominantly industrial sites and complement the borough's SIL areas. The same priority uses are expected to be delivered on LSIS and SIL.

**9.17** Renewal and upgrade of employment space to ensure it is high quality and fit for purpose is important. Such proposals will be supported especially where they allow for future flexibility, including both subdivision and amalgamation, as required, to meet needs.

**Policy 27****Safeguarding and Managing Change in Borough Employment Areas**

To safeguard and manage land in Borough Employment Areas (BEA):

A. The following uses will be supported:

- i. Offices (Class E Part G i), subject to compliance with Policy 39 'New Retail, Office and Leisure Developments';
- ii. Workspaces (Class E Part G);
- iii. Research and development of products or processes (Class E Part G ii); and
- iv. Uses ancillary to the above;

B. New development will be supported where it:

- i. Provides improved high-quality, fit for purpose employment space and infrastructure;
- ii. Allows for future flexibility, including future subdivision and/or amalgamation for a range of employment uses; and
- iii. Provides either the full replacement or the intensification of existing employment capacity. Landowners should, where appropriate, work with landowners of adjacent sites in order to make the most efficient use of land.

**9.18** Borough Employment Areas (BEA) perform an important function for the borough's economy. BEAs are therefore considered areas suitable for offices and workspace within Use Class E Part G i and ii.

**9.19** Renewal and upgrade of employment space to ensure it is high quality and fit for purpose is important. Such proposals will be supported, especially where they allow for future flexibility, including both subdivision and amalgamation, as required, to meet needs.

**Policy 28****Approach to Non-Designated Employment Land**

Development for industrial, business and related uses (including creative and artists' workspace) will be supported in non-designated employment areas where it provides fit for purpose and high-quality employment space and upgrades existing poor quality or old stock. Development which seeks to introduce residential or mixed-use elements to non-designated employment locations will only be supported where:

- A. It uses the Agent of Change principle to mitigate design and sensitivity impacts (see Policy 30 'Co-Location Design Principles'); and
- B. It provides replacement or intensified employment floorspace, with the quantum of any existing industrial, storage, or distribution floorspace being - as a minimum - fully re-provided as an industrial use; or
- C. The scope for mixed-use intensification with employment uses has been explored fully and any loss of floorspace is justified with reference to marketing evidence of at least 12 months demonstrating no reasonable prospect of the site being retained in business or industrial uses; or
- D. The proposal accords with an adopted allocation in a Development Plan Document for residential or mixed-use development.

**9.20** Outside of the borough's SIL, LSIS and BEA sites, non-designated employment sites can provide suitable locations for employment uses, such as workspace (including affordable and creative workspace), light industrial, manufacturing and production uses. In recognition of the decline in heavy industry as well as certain manufacturing and production industries, a more flexible approach has been adopted for the borough's non-designated employment land as opposed to the borough's SIL, LSIS, and BEA. However, given the borough's demand for employment floorspace and changing employment needs, the re-provision or intensification of such sites is promoted where it can provide fit for purpose and high-quality employment space.

**9.21** To prevent the loss of well performing employment floorspace to residential uses, new developments will be expected to provide sufficient evidence to demonstrate 'no reasonable prospect' of the site being used for employment uses. In implementing this policy, the Council will usually expect a marketing report to be submitted with any planning application involving the re-use or redevelopment of a Class B2, B8 or Class E part G site for an alternative non-employment use. Applicants will be required to provide robust evidence that the relevant employment site or floorspace has been marketed for at least 12 months, that the form of the marketing has been appropriate, and that, despite best endeavours, no tenant (or purchaser) interested in using the site or floorspace for employment use can be found. The evidence provided should satisfy the requirements of the London Plan outlined at paragraphs 6.1.7 and 6.7.5.

**9.22** Co-location, intensification and consolidation approaches are supported on non-designated employment land and further guidance will be set out in the Industrial Intensification Supplementary Planning Document (SPD).

## Policy 29

### Industrial Masterplan Approach

Industrial masterplans can support the intensification of existing industrial functions to provide additional industrial capacity. The proposed introduction of non-industrial uses within designated industrial sites must be supported by an industrial masterplan approach. Masterplans will be required to:

- A. Be delivered in partnership with and by agreement of the Council and the GLA;
- B. Take a comprehensive approach and cover the extent of an entire SIL or LSIS;
- C. Not lead to any loss in industrial capacity across the SIL or LSIS, and must seek to provide a net increase of industrial floorspace capacity<sup>(6)</sup>;
- D. Achieve industrial intensification ahead of delivering any non-industrial uses, taking an 'industrial first' approach to phasing;
- E. Be informed by an up-to-date audit of the designated location and evidence covering employment land needs, wider spatial context, land ownerships, partnerships and engagement, and infrastructure requirements;
- F. Be supported by a viability and delivery plan;
- G. Set out how existing businesses will be retained through a retention and relocation strategy;
- H. Be supported by a servicing and management strategy; and
- I. Be developed according to a two-stage process:
  - a. Stage 1: Based on up-to-date evidence, including a full audit of the designated site, and appropriate engagement with landowners and existing businesses, identify the sub-areas within the SIL/LSIS to be 'areas of intensification and

<sup>6</sup> Industrial floorspace capacity is: the built floorspace across all complete floors (including additional floors in multi-storey developments and basements where they exist); or if the site is utilised primarily for open-yard or storage-based uses, the benchmark figure for reprovision is calculated at 65% of the total site area. Where sites are in waste use, capacity will be considered in through-put terms, in line with Policy 93 'Waste Management'.

consolidation' and, where relevant, those proposed as 'areas of change'. These sub areas must be agreed and approved with the GLA and the Council before progressing to Stage 2.

- b. Stage 2: Further develop the agreed masterplan for the entirety of the SIL/LSIS and produce detailed sub-area masterplans, which together demonstrate how the industrial capacity outlined in Stage 1 will be achieved. At this stage, in line with Policy 53 'Delivering High Quality Design', consideration should be given to land assembly and opportunity for coordinated development.

Following the agreement of a two-stage masterplan with the Council and the GLA, any resultant boundary changes to relevant industrial designations are required to be reflected in the next Development Plan Document (DPD) to be prepared.

**9.23** The London Plan outlines a process for achieving intensification of designated industrial areas to provide additional industrial capacity. In some circumstances, where it would be to the benefit of the wider area, and demonstrably helps meet industrial and employment needs, this could facilitate the consolidation of industrial use on a designated site, potentially allowing for the subsequent introduction of non-industrial uses into these areas in order to meet other planning objectives.

**9.24** A comprehensive approach is required to deliver intensification and consolidation which considers both borough-wide employment requirements and land capacity and also each designated location. The aim of the comprehensive approach to intensification and consolidation is to ensure that there is a net gain in employment floorspace to meet the overall need of an additional 52,000sqm. Appropriate uses on SIL and LSIS are set out in Policy 25 'Safeguarding and Managing Change in Strategic Industrial Locations' and Policy 26 'Safeguarding and Managing Change in Locally Significant Industrial Sites'.

**9.25** Waltham Forest's industrial areas – SIL and LSIS – have unique characteristics. Each area has a different role to play in the London-wide and local economy, now and in the future. Appendix 2 'Employment Land' sets out the borough's employment sites. These are based on the Employment Land Study (2019) and Employment Land Audit (2021). Detail on how industrial intensification and consolidation can be delivered in each of the borough's industrial locations will be set out in the Industrial Intensification Supplementary Planning Document (SPD).

**9.26** The industrial masterplan process requires engagement with Council and the GLA as well as other stakeholders including, but not limited to, the landowners and businesses.

**9.27** Following the development of a masterplan which is agreed by the Council and the GLA, any boundary changes which are proposed to individual designations are required to be reflected in the subsequent DPD to be prepared.

**9.28** To deliver intensification and consolidation, 'areas of intensification and consolidation' will be identified. These are defined as areas where there is an opportunity to deliver an uplift in space for industrial businesses. This uplift is expected to be delivered on-site and ahead of any development on an 'area of potential change'. Areas of potential change are defined as areas where there may be an opportunity to deliver non-industrial uses because:

- The area of SIL or LSIS has been identified as suitable for de-designation as industrial land; or
- Such uses are co-located alongside industrial uses within land that is designated as LSIS, or land that is designated as SIL that has been identified as suitable for re-designation as LSIS.

**9.29** These areas will be determined with reference to the following factors:

- Current utilisation of land and sites (including plot ratio);
- Current condition of the stock;
- Deliverability including land ownership;
- Servicing both inside and outside of the site;
- Ability for different uses to exist together; and
- Businesses' intentions.

**9.30** The current utilisation of land and sites is a key consideration. Where the existing uses are inefficient this may allow for intensification and consolidation of uses. Older stock will be more attractive to redevelop and intensify as it requires investment and repair. Less fragmented ownership may make delivery of intensification, or consolidation, easier to secure. A further consideration of delivering intensification and consolidation is the compatibility of industrial uses. Some uses are better suited to being located in close proximity. For instance, light industrial and office or studio space may make better neighbours than businesses with noisy or noxious operations. It is important to understand the future intentions and evolving needs of businesses, and for this to inform the production of any masterplan.

**9.31** The London Plan sets out a masterplan approach to delivering any change in SIL and LSIS with further guidance set out in the Industrial Practice Note (2018). The masterplan approach can be delivered by a public sector body or private developer/landowner, as long as it is agreed with the GLA and the Council. Each masterplan should take account of the proposed future vision of the SIL or LSIS area. Viability and delivery are key components of the masterplan to prevent the loss of important industrial space across the borough. This should be accompanied with a plan which sets out how existing business will be retained and accommodated in any redevelopment. These should include consideration of businesses that need grow on space. Part of the process of redevelopment will require businesses to be decanted while business space is upgraded. Early engagement with businesses will be vital to the success of any proposed development. To ensure this is delivered successfully, a decant strategy will be expected to be submitted.

**9.32** To ensure that employment uses are delivered and that no further employment capacity is lost in the borough, the employment elements of proposed masterplan will be phased to be delivered first. This could be delivered via a hybrid planning application. Both completion and operation of the employment space is expected to be delivered ahead of the first occupation of any other use.

**9.33** Masterplans and new development in SIL and LSIS should not only aim to provide intensification, but also to improve the quality of industrial space to ensure it is fit for purpose and has the required supporting infrastructure to keep, seed and grow businesses.

**9.34** Ensuring that servicing and deliveries can function across the SIL or LSIS, especially when delivering intensification, consolidation or change is important to ensuring businesses can run effectively. Any redevelopment of SIL or LSIS should include a servicing and management strategy to understand how it will impact on the existing businesses and existing servicing arrangements. In addition, any impacts on the wider transport network should be set out.

**9.35** Where substitution of capacity from Waltham Forest to another location within London is proposed, this should give full consideration to the positive and negative impacts of substitution, including, but not limited to:

- Impacts on the local economy (including the labour market);
- Impacts on supply chains; and
- Impacts of trip distance, congestion, and pollution.

**9.36** Where all relevant impacts have been addressed to the satisfaction of Waltham Forest, the host borough, and the GLA, and the proposal results in a more efficient use of land, substitution of capacity will be supported. The consolidation of wholesale markets following this approach, and in line with Part F of London Plan Policy E4 'Land for industry, logistics and services to support London's economic function', will be supported.

## Policy 30

### Co-Location Design Principles

To be supported, proposals involving co-location will need to demonstrate:

- A. High quality and innovative design approaches to create a buffer and separation between any heavy or intensive industrial uses and adjacent non-industrial uses; and
- B. Appropriate design mitigations which address the following:
  - i. Safety and security;
  - ii. Layout, orientation, access, servicing and delivery arrangements of uses, including refuse;
  - iii. Design quality, public realm, visual impact and amenity for residents;
  - iv. Vibration and noise;
  - v. Air quality including dust, odour and emissions; and
  - vi. Agent of Change principles.

**9.37** Design mitigation between industrial and non-industrial uses will be important to ensure that co-location can be delivered effectively. This should be designed with the industrial uses in mind, ensuring that their operation is not compromised, and the Agent of Change principle is applied. Other design mitigation that should be considered are safety and security, layout and orientation, public realm, and environmental health impacts such as noise and air quality.

**9.38** If the masterplan route is followed (see Policy 29 'Industrial Masterplan Approach'), uses that may be appropriate for co-location alongside industrial include residential, retail, food and drink and social and community infrastructure uses.





**Policy 31****Workspaces**

The provision of workspaces will be supported where they:

- A. Are located in Strategic Industrial Locations (SIL), Locally Significant Industrial Sites (LSIS), Borough Employment Areas (BEA); Town Centres; Strategic Locations or as part of regeneration projects;
- B. Provide uses in line with Policy 25 'Safeguarding and Managing Change in Strategic Industrial Locations', Policy 26 'Safeguarding and Managing Change in Locally Significant Industrial Sites' and Policy 27 'Safeguarding and Managing Change in Borough Employment Areas', as appropriate;
- C. Deliver high quality, well designed, flexible and adaptable spaces of different sizes and types for a range of uses and occupants;
- D. Can be demonstrated to be meeting the requirements of intended end users, where identified;
- E. Provide a fit out which is finished to a standard meeting the essential requirements of the intended end-user, where such a user has been identified and fit out is appropriate;
- F. Provide affordable workspace in line with Policy 32 'Affordable Workspace'.

**9.39** Workspaces vary in the type of space they provide, from more traditional dedicated office, studio and workshop space, to a more flexible co-working offer.

**9.40** Providing a range of workspaces will ensure that the right kind of space is available for occupation by businesses wishing to start-up or expand. It will also help to ensure that space is available at an appropriate range of rents.

**9.41** SIL, LSIS, BEA, Walthamstow Major Centre and the borough's District Centres and some Neighbourhood Centres have been identified as the main destinations for workspace development.

**9.42** Workspaces sit across different use classes. In SIL and LSIS, other than through the approach set out in Policy 29 'Industrial Masterplan Approach', only workspace which falls within the uses set out as appropriate in Parts A of Policy 25 'Safeguarding and Managing Change in Strategic Industrial Locations' and Policy 26 'Safeguarding and Managing Change in Locally Significant Industrial Sites' will be acceptable.

**9.43** New workspace development will contribute to the vitality and vibrancy of the borough's town centres by creating footfall and daytime activity, and will be able to capitalise on the benefits of good public and sustainable transport connectivity via Enjoy Waltham Forest, London Underground, London Overground and local bus services.

**9.44** As the borough's Creative Enterprise Zone (CEZ), Blackhorse Lane will continue to be an area for regeneration, with specific investment directed to the provision of new low cost studio and workspace to support the area's existing and emerging creative industries.

**9.45** Workspace should be flexible and adaptable to suit a range of needs and different occupants, including by providing a range of sizes and types. New workspace should provide a basic fit out beyond shell and core. This will ordinarily include all finishes, suspended ceilings, raised floors, and the extension of mechanical and electrical services to the working area of the building. In general, the fit out must have all the essentials which could reasonably be expected by any occupier. Early engagement with operators and potential occupiers is central to the design and delivery of successful workspace.

**9.46** The delivery of new low cost and affordable workspace as part of developments proposing 1,000+ sqm of non-residential floorspace (gross) will support the objective to “keep, seed and grow” businesses in the borough. Providing space at a discount on market rent will ensure that rents are set at an affordable rate for local businesses, however, different areas in the borough may have different markets and so different levels of discount may be appropriate.

### Policy 32

#### Affordable Workspace

Affordable workspaces are workspaces which are provided at rents maintained below the market rate for that space, for a specific social, cultural, or economic development purpose, and secured in perpetuity or for a period of at least 15 years by legal agreement. The delivery of affordable workspaces will be required to be provided:

- A. As part of the delivery of new employment floorspace of 1000sqm or greater in SIL, LSIS, BEA and in town centres, where viable;
- B. As part of major mixed use developments in town centres, in Strategic Locations or as part of regeneration schemes, where viable;
- C. On-site, with a payment in lieu to be sought where this is not possible.

**9.47** The aim of delivering new low-cost affordable workspace is to keep, seed and grow business in the borough. It will be sought as part of new development in the borough’s employment areas: SIL, LSIS and BEA and town centres. Affordable workspace will also be supported as part of mixed use schemes, regeneration schemes and in Strategic Locations.

**9.48** Waltham Forest has signed the Mayor’s workplace pledge. The Mayor has pledged to support workspaces for start-ups, small businesses and artists in London. The pledge has four aims:

- Limiting the conversion of office space to residential space through permitted development rights;
- Encouraging the provision of affordable workspace through planning policy and good practice;
- Ensuring new developments include non-residential space suitable for the needs of small businesses; and

- Seeking funding and partnerships to create new space for start-ups, small businesses, the creative industries and artists.

**9.49** It is expected that affordable workspace will be delivered on-site. Where this is not possible, payment in lieu will be accepted. The payment in lieu process will be set out in the Developer Contributions Supplementary Planning Document (SPD). For space that is provided on-site, it is expected that this will be delivered as space held at a discount below market rent. This will ensure that rents are set at an affordable level for local businesses.

**9.50** Evidence on the viability of delivering affordable workspace demonstrates variability across typologies and locations. As such, the level of discount from market rents and quantum of floorspace sought will be determined on a case by case basis. Evidence on appropriate reference market rent levels should be submitted as part of any planning application in line with guidance in the Developer Contributions Supplementary Planning Document (SPD).

**9.51** Early engagement with operators and potential occupiers is central to the design and delivery of successful workspace. Further guidance will be provided in an Affordable Workspace Strategy and the Developer Contributions Supplementary Planning Document (SPD).

**9.52** Affordable workspace and contributions will be secured via Section 106 agreements.

### Policy 33

#### Local Jobs, Skills, Training and Procurement

Economic and employment benefits for local residents and businesses will be secured by requiring:

- All development where there is a loss of employment floorspace to provide jobs, skills and training for local residents via Section 106 contributions as set out in the Developer Contributions Supplementary Planning Document (SPD);
- All developments of 25 homes or more to provide jobs, skills and training for local residents via Section 106 contributions as set out in the Developer Contributions Supplementary Planning Document (SPD); and
- Supporting procurement of local businesses as set out in the Developer Contributions Supplementary Planning Document (SPD);
- Supporting the provision of a broad range of employment and training opportunities across a variety of sectors available to local residents, including in the construction and operational phase of new developments; and
- Supporting the growth of existing and future start-ups, SMEs and business in key growth sectors.

**9.53** One of the borough's key priorities is to ensure Waltham Forest residents have access to skills, training and employment. Working with the Council's employment and skills services and approved partnerships in line with the Waltham Forest's Connecting Communities programme, the Council will support local residents to access a variety of training and employment opportunities.

**9.54** By harnessing the benefits of economic growth and working with partnerships and training facilities, the borough will seek to ensure that there are a broad range of employment opportunities across a variety of sectors available to local residents. This includes opportunities in both the construction and operation phase of new developments, creating a sustainable balance of contract, temporary and permanent employment opportunities of various skill levels.



**9.55** It is important for all Waltham Forest residents to have access to opportunities for training and skill development. The Developer Contributions Supplementary Planning Document (SPD) sets out the structure for the negotiation and compliance of Section 106 obligations to capture the opportunities of growth and ensure Waltham Forest residents have access to high quality employment across the borough.

**9.56** Access to local jobs can be lost when employment floorspace is lost to other uses. To mitigate against this, Section 106 contributions will be sought to provide training and new skills to find new jobs. There are also opportunities to secure jobs from new development and this is expected on all developments of 25 homes or more.

## Policy 34

### Railway Arches

New development in the borough's railway arches will be encouraged by:

- A. Supporting industrial uses in railway arches located in SIL and LSIS in line with Policy 25 'Safeguarding and Managing Change in Strategic Industrial Locations' and Policy 26 'Safeguarding and Managing Change in Locally Significant Industrial Sites', and the introduction of other uses, including those falling within Class E and drinking establishments, as part of an agreed two-stage industrial masterplan;
- B. Supporting current and future B2, B8, Class E, and drinking establishment uses in arches outside of designated employment locations especially with proximity to stations, in Town Centres, or as part of wider regeneration schemes;
- C. Promoting improvements to the appearance of railway arches through upgrades, active frontages and improvements to access and the public realm;

- D. Supporting development that does not have an adverse impact on the railway line;
- E. Ensuring development does not interfere with the safe movement of pedestrians, cyclists or traffic on the public highway and pedestrian public realm; and
- F. Ensuring new development adopts suitable design mitigations in line with Policy 57 'Amenity' .

**9.57** Waltham Forest has an ample supply of underused and vacant railway arches, providing opportunities for active use. Due to their size, scale and location, many of the boroughs railway arches are capable of providing suitable and low-cost locations for employment activities including office, research and development, and light industrial (Class E Part G i, ii, iii), General Industrial (Class B2) and Storage and Distribution (Class B8) needs.

**9.58** There is opportunity to broaden the type of uses within the borough's railway arches to include wider commercial, business and service uses falling in the rest of Class E and drinking establishments, especially around station hubs, town centres or as part of wider regeneration. This will help to boost the vitality and vibrancy of the area surrounding the railway arches and contribute to the diversity of town centres.

**9.59** Some railway arches are located in residential and noise sensitive areas. Similar to the borough's employment sites, it is important for new developments to adopt suitable design measures to avoid impacts and reduce disturbances to sensitive uses, obstruction of public realm and adverse impacts to the railway line.

## Implementation

**9.60** The main tools the Council has in delivering the policies in this section of the Plan are:

- Industrial Masterplans;
- Industrial Intensification Supplementary Planning Document (SPD);
- Developer Contributions Supplementary Planning Document (SPD) and Section 106 contributions; and
- The planning application process.

## Promoting Culture and Creativity

### Strategic Objective

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.

**10.1** Waltham Forest is an important cultural centre in London and the borough's designation as the first ever Mayor of London Borough of Culture in 2019 is testament to this. The Local Plan plays an important role in ensuring the Council builds a lasting legacy from the opportunities 2019 presented, which benefits the whole of its culturally diverse population.

**10.2** The Council has approved a new Destinations Strategy to establish Waltham Forest as a 'Destination Borough', engaging residents, enabling creativity, celebrating our individuality and utilising our resources to ensure viability, impact and legacy. The Council is now working on a specific Culture Strategy to develop its vision and ambitions further around facilitation of cultural production and programming across the borough and support for creative organisations, including affordable workspace.



Figure 10.1 Culture in Waltham Forest

**10.3** Cultural infrastructure captures both cultural consumption (places where culture is experienced, participated in, exhibited or sold) and cultural production (places of creative production, where creative work is made, usually by artists, performers, makers, etc), in alignment with the [London Cultural Infrastructure Plan](#) (2019) and [Map](#). Taking this definition into consideration, Waltham Forest has been a leading borough in recognising the value of investing in culture and has sought to take forward interventions to help support this. The Council identified, based on the Audience Spectrum population profiling tool,<sup>(7)</sup> that Waltham Forest is most strongly comprised of two population groups:

- Kaleidoscope Creativity (46% of Waltham Forest residents, compared with only 32% of London residents overall). The profile for this grouping suggests these residents are “urban and culturally diverse, their arts and cultural activity happens in their community and outside the mainstream (Lower engagement)”; and
- Experience Seekers (31% of Waltham Forest residents, compared with only 15% of London residents overall). The profile for this grouping suggests these residents are “diverse urban audiences, students and recent graduates into a variety of cultural events (Higher engagement)”.

**10.4** The creative and cultural economy is an important economic contributor in the borough, and it is growing. Cultural, arts, entertainment and visitor attractions support the vitality and vibrancy of the borough’s places. It is also an important part of the community and social infrastructure of the borough as it brings people together, encouraging community cohesion and building social capital. Nationally, Arts Council England has identified that arts and culture directly contributed £10.6 billion in 2016 to the national economy with the indirect (supply chain) with induced spending effects of this adding a further £12 billion of value. These figures increased year on year since the first report of its kind was published in 2013, as did employment in the sector which, by 2016, was over 360,000<sup>(8)</sup>.

**10.5** Creative businesses have grown faster in Waltham Forest than London as a whole, achieving 85% growth over the five-year period from 2014 to 2019.<sup>(9)</sup> This is equivalent to an additional 885 businesses and exceeds the growth rate across all industries in the borough (52%). As Figure 10.2 Business Activity by Creative Sub-Sector in Waltham Forest (2014-2019) shows, the largest creative sub-sector (2014-2019) is IT, software and computer service (38%), followed by film, TV, video, radio and photography (20%). In terms of employment, the borough has 2,500 creative sector jobs, which makes up 4% of total employment. This falls below the London average of 10%, but is in line with the Outer London average of 5%. Nevertheless, creative jobs expanded by 64% in the borough over the five year period from 2013 to 2018, which is equivalent to an increase of circa 1,000 jobs.<sup>(10)</sup>

7 Waltham Forest Cultural Infrastructure Study (2020)

8 CEBR, 2019, ‘Contribution of the arts and culture industry to the UK economy’

9 ONS Business Count, 2019. Data captured at March 2019. Available at: [www.ons.gov.uk](http://www.ons.gov.uk)

10 BRES, 2019. Note BRES data has been rescaled for 2013 and 2014. Available at: [www.nomisweb.co.uk](http://www.nomisweb.co.uk)

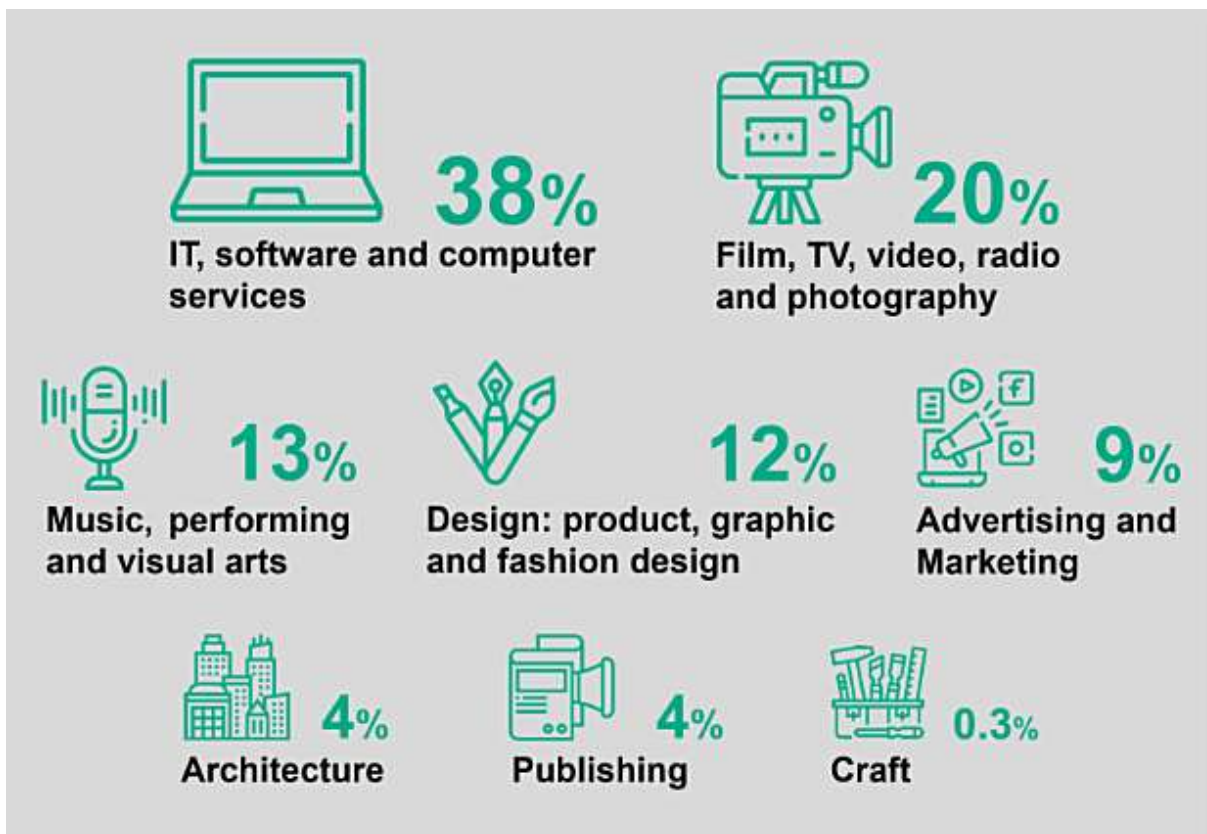


Figure 10.2 Business Activity by Creative Sub-Sector in Waltham Forest (2014 - 2019)

**10.6** The [Council's Cultural Infrastructure Study \(2020\)](#) identified that there are a significant number of creatives living and working in the borough. These are artists, designers and other creative professionals, and the creative industries contribute strongly to the local economy. It is a sector that is supported in the borough. Accordingly, the policy in this chapter should be read in conjunction with policies in the previous chapter: 'Building a Resilient and Creative Economy'.

**10.7** Waltham Forest's cultural attractions are not limited to museums and galleries, such as the William Morris Gallery, Queen Elizabeth Hunting Lodge and Vestry House Museum, but also include important outdoor spaces such as Epping Forest, Lee Valley Regional Park, Walthamstow Wetlands and Fellowship Square. There is scope to use outdoor space and public realm for cultural purposes and events. Public art, exhibitions and events play an important role in allowing everyone to have access to culture and these are supported and encouraged.



**Policy 35****Promoting Culture and Creativity**

Arts, culture, creativity and entertainment will be supported by the Council, especially where this boosts the economy and enhances quality of life in the borough. Development proposals should:

- A. Protect and enhance cultural venues. Development proposals involving the loss of arts, culture and/or entertainment facilities will be resisted where a continuing demonstrable need exists, unless the facility is re-provided in accordance with other policy requirements in the Plan (see Policy 46 'Social and Community Infrastructure');
- B. Encourage and direct new cultural venues in the following ways:
  - i. Major development of arts, culture, entertainment and visitor facilities should be directed to Walthamstow Town Centre, other designated Town Centres and other locations accessible by public transport (See Policy 39 'New Retail, Office and Leisure Developments');
  - ii. Smaller scale proposals will be supported in areas that are accessible by public transport, walking and cycling routes and in locations that are accessible to those who are likely to use the facility;
  - iii. Where appropriate (in accordance with other policies of the Plan), new and existing social and community infrastructure will be encouraged to include space for art and cultural events;
- C. Support temporary, meanwhile cultural uses in vacant buildings, parks and open spaces in highly accessible locations and in designated Centres, particularly where these meet community requirements, including for performance and creative work;
- D. Encourage the use of outdoor spaces and the public realm for art, culture, sports and entertainment uses in designated centres;
- E. Mitigate impacts from noise and other nuisance-generating activities in line with the Agent of Change principle;
- F. Promote the early integration of public art within development proposals, particularly in the Strategic Locations; and
- G. Secure Section 106 contributions, as set out in the Developer Contributions Supplementary Planning Document (SPD), towards the provision of public art and cultural activity including the funding, management, development, implementation and maintenance of public art projects which are part of major development sites.

All major development proposals involving mixed use/commercial space should contribute to cultural enhancement projects in the local area, subject to viability considerations.

**10.8** This policy seeks to promote culture, creativity, public art and entertainment as part of the placemaking process and in order to enhance local identity. Where necessary, new major developments that propose cultural or entertainment uses outside Major or District Centres will need to follow the sequential test set out in Policy 39 'New Retail, Office and Leisure Developments'. However, as set out in Policy 35 'Promoting Culture and Creativity' areas in the borough that are highly accessible by public transport, but outside Major or District Centres, are considered appropriate for major arts, culture, entertainment and visitor facilities as well as smaller scale proposals.



**10.9** Ensuring that land and facilities are used efficiently is important for the borough and may require the dual use of sites for a range of uses, including cultural uses. Cultural uses also have the ability to activate vacant units in town centre locations and along high streets. Where appropriate, social and community infrastructure uses will be expected to offer space for arts and culture. There is also an opportunity to use the public realm and outside

space for cultural activities, especially in parks and town centres.

**10.10** The Council will support opportunities to use vacant buildings, land and open spaces for flexible and temporary meanwhile uses or 'pop-ups', especially for alternative cultural day- and night-time uses. This also presents an opportunity for community uses, particularly those that are transient or may operate on a short timeframe. Cultural and creative uses, whether long or short term, can enliven town centres and reduce anti-social behaviour.

**10.11** The Council is preparing a Cultural Strategy which will set out a list of cultural enhancement projects to be delivered, including:

- Subsidised spaces for cultural tenants and creative workspace including artists' studios;
- Permanent arts commissions integrated within landscaping or building features;
- Early activation through temporary creative projects during a development's construction phase;
- Support for local festivals and related cultural activity; and
- Creative ways for local communities to participate, co-create and share good practice.

**10.12** In securing these projects, the Council will work proactively with developers and applicants.

**10.13** The Council defines public art as an artwork, or artworks, designed by a professional artist or craftsman, involving local communities, for a particular building or site that is accessible to the public. Public art brings a wide range of social and cultural benefits and will be encouraged as part of new development, especially where it contributes positively to a sense of place and enhances the streetscape. It will be used to encourage footfall and support the visitor economy. To maximise the impacts of these benefits, public art should be located in key locations, within the public realm and publicly accessible open spaces, where significant numbers of people can enjoy and experience it. A transparent process of commissioning and funding public art is expected, with local involvement given precedent whenever possible.

### Policy 36

#### Protecting Public Houses

- A. Public houses (pubs) will be protected as important local assets in the borough, especially when:
- i. They have a heritage, economic, social or cultural value to the local community, in line with relevant policies in 'Conserving and Enhancing our Heritage' and 'Promoting Culture and Creativity'; or
  - ii. They are of significant importance for particular group in the community, especially as a place for socialising and entertainment; or
  - iii. They are registered as an Asset of Community Value, and appropriate and proportionate public consultation has been undertaken by the developer/applicant with the local community;
- B. The Council will only permit the change of use or redevelopment of a public house (Sui Generis) after consideration of relevant policies and if all of the following criteria are met:
- i. There would be no resulting shortfall of public house provision;
  - ii. Proposals meet the requirements of Policy 46 'Social and Community Infrastructure'; and
  - iii. There is evidence that the existing use or business operation is not financially viable and the site has been prominently marketed at a realistic freehold or leasehold price for the same use for a continuous period of at least 24 months.

**10.14** Public houses (pubs) play an important role at the heart of many local communities, and the National Planning Policy Framework (NPPF) (2021) identifies them as community facilities that contribute to enhancing the sustainability of communities and residential environments. They have historically provided social hubs for diverse communities, especially LGBTQ+<sup>(11)</sup> and ethnic minority communities, as well as making a positive social contribution to townscape and local identity. Today they play an important role in promoting community cohesion and offering opportunities for people from different walks of life to mix.

11 The acronym LGBTQ+ is an inclusive way of referring to all those who do not identify as heterosexual and/or cisgender.

More than just a place to relax and drink, they can provide social, recreational and cultural facilities and services, hosting events and clubs, and providing informal meeting spaces for local interest groups and visitors.

**10.15** Pubs also have a strong role to play in supporting the local economy. They can help bring activity and vibrancy to high streets, and provide employment opportunities, both directly and indirectly, by supporting food suppliers and the brewing industry. Supporting such businesses is particularly relevant given the importance of the food and drinks industry to Waltham Forest.



**10.16** The Council identified 69 pubs in the borough in 2020<sup>(12)</sup> Both the [2019 London Pubs Annual Data Note, Cultural Infrastructure Report \(August 2019\)](#) (part of the Mayor's Cultural Infrastructure Plan) and the borough's [Cultural Infrastructure Study \(2020\)](#) registered that over recent years local pubs across London and the borough have been lost. This policy therefore seeks to protect those pubs that remain, whilst allowing for new ones to be delivered in town centres and other accessible locations, particularly where they provide wider community facilities and employment.

**10.17** Given the value pubs bring to local communities, evidence must be provided that all avenues for retaining them have been exhausted before alternative community uses can be considered. With regard to marketing evidence, firstly, evidence should be provided that the existing business is no longer financially viable. Insufficient evidence of attempts to diversify the business may indicate that the pub use could be made viable. As a failing pub

12 GLA [Cultural Infrastructure Map, London Data Store](#) and [Waltham Forest Cultural Infrastructure Study, May 2020](#).

may be given a new lease of life under alternative ownership, the Council will require evidence that it has been sufficiently marketed for 24 months without genuine interest before any alternative uses can be considered.

### Policy 37

#### Blackhorse Lane Creative Enterprise Zone

Development in the Blackhorse Lane Creative Enterprise Zone (CEZ) is expected to:

- A. Deliver affordable workspace in line with Policy 31 'Workspaces' and Policy 32 'Affordable Workspace';
- B. Explore the opportunity for cultural uses within the CEZ, where compliant with other related policies within the Plan;
- C. Explore the opportunity to use temporarily vacant buildings and sites for meanwhile uses, creative workspaces and other cultural uses;
- D. Ensure that new development adheres to the Agent of Change principle as set out in London Plan Policy D13 'Agent of Change';
- E. Maximise opportunities to improve digital infrastructure in the CEZ in line with Policy 69 'Digital Infrastructure'; and
- F. Support the delivery of creative jobs in the CEZ in line with Policy 33 'Local Jobs, Skills, Training and Procurement'.

**10.18** In 2021, Blackhorse Lane was designated a Creative Enterprise Zone (CEZ), part of a groundbreaking Mayor of London initiative that aims to make it easier for artists and creative businesses to flourish in a space of their own. In 2023 the zone was officially launched as Blackhorse Collective. The designation recognises the high quality of the area's existing businesses, its rich history of making, and its potential for growth. It is intended to ensure that the area continues to foster creativity for many years to come.

**10.19** Blackhorse Lane is home to many of the borough's creative and cultural industries. Examples of the spaces and uses located in the area include Blackhorse Workshop, Big Creative Academy, Switchboard Studios and Gnome House. It is not only the spaces and businesses located in Blackhorse Lane that make it an important area but the way in which they function as a creative ecosystem, with important supply chains linked across the area. Figure 10.3 sets out the boundary of the CEZ where the policy applies.

**Figure 10.3** Blackhorse Lane Creative Enterprise Zone (CEZ)

**Key**

-  Blackhorse Lane Creative Enterprise Zone (CEZ)
-  Borough Boundary



0 250 m 500 m

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**10.20** CEZs are focused around the following four pillars:

- **Space:** Permanent, affordable, creative workspace and live-work spaces at below market rents and ensuring no net loss of space;
- **Skills and support:** Building entrepreneurial skills and offering business support to artists, start-ups, sole traders, micro and small businesses, developing career pathways and opportunities for progression into the creative industries and supporting sectors;
- **Policy:** Local Plans with pro-culture policies in planning, housing, business development, technology and infrastructure, and supportive business rates policies; and
- **Community:** Embedding creative production in communities, creating socially-inclusive places and strong links with education providers.

**10.21** The Local Plan seeks to meet the objectives of the four pillars by protecting and supporting the delivery of new creative workspace, securing Section 106 contributions towards jobs in creative industries, providing infrastructure to support the creative economy and by having pro-culture policies.

**10.22** Affordable workspace will be secured via Section 106 agreements with further guidance provided in the Developer Contributions Supplementary Planning Document (SPD). Affordable workspace is defined here as workspace that provides rents maintained below the market rate in line with Policy 32 'Affordable Workspace' and London Plan Policy E3 'Affordable Workspace'. In the Blackhorse Lane CEZ the priority will be affordable workspace for the cultural and creative sectors.



**10.23** Development proposals in the CEZ are expected to adhere to the Agent of Change principle in order to ensure that the continued industrial and creative functions of Blackhorse Lane are protected.

## Implementation

**10.24** The main tools the Council has in delivering the policies in this section of the Plan are the:

- Planning application process;
- Community Infrastructure Levy (CIL) and Section 106 contributions;
- Developer Contributions Supplementary Planning Document (SPD)
- Industrial Intensification Supplementary Planning Document (SPD);

- Destinations Strategy and Cultural Strategy; and
- Blackhorse Lane Strategic Industrial Land Masterplan (agreed with GLA) and subsequent SPD.

**10.25** Additionally, the Council will continue to work with the local creatives in the Blackhorse Collective to realise the ambitions of the Creative Enterprise Zone.



## Distinctive Town Centres and High Streets

### Strategic Objectives

Support Waltham Forest's thriving, safe and attractive town centres by maintaining their distinctive roles and making them accessible to all.

Ensure that residents are able to meet their day to day needs within a 15 minute walk, wheel or cycle of their home. Conserve and enhance the borough's network of culturally diverse, inclusive and sustainable neighbourhoods and celebrate their locally distinctive character and heritage.

**11.1** This section sets out the policies for managing growth and change in the borough's town centres. The National Planning Policy Framework (NPPF) defines main town centre uses as including retail, leisure, entertainment facilities, recreation uses, offices and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities). In planning for good, inclusive growth, it is necessary to ensure that there is a good choice and range of town centre uses at the most appropriate locations for existing and future residents.

**11.2** Policies in this chapter of the Plan have been prepared at a time of uncertainty associated with the Covid-19 pandemic. Whilst the full effects of the pandemic in the long term are yet to be seen, it is expected that the trend towards changing consumer habits which started prior to Covid-19 will continue, accelerated by lifestyle changes associated with greater homeworking and less travel to Central London and other places for work or other economic activity. Accordingly, it is likely that there will continue to be larger day-time populations working locally for the foreseeable future, presenting an opportunity for the borough's centres to re-imagine themselves to capture local trips and spend that were previously diverted elsewhere.

**11.3** A flexible policy approach has been set out in this chapter to guide and manage change going forward, supported by other initiatives the Council is taking to restore confidence in the borough's town centres and deliver ambitious plans to re-shape them for the future. See, for example, the [Waltham Forest High Streets Action Plan, June 2020](#).

**11.4** Prior to the Covid-19 pandemic, an assessment of the need for retail floorspace during the Plan Period (up to 2035) was undertaken as part of the Waltham Forest Retail & Town Centres Study (2019). Evidence from the study indicates a reduced requirement for net additional retail floorspace across the borough in the short to medium term. For convenience retail, the study indicates a projected need of only 1,700sqm by 2029 and 3,600sqm by 2035. Comparison retail floorspace need is also projected to be 3,700sqm by 2029 and 15,000sqm by 2035. The study notes the significant impact upon available net additional quantitative capacity arising from recent retail commitments and also a number of factors including the ongoing challenges faced by the UK retail sector generally. Crucially, the study also notes that less reliance should be placed upon the 2035 forecast due to the time periods involved,

and the NPPF advises that local authorities can focus on at least 10 years into the future rather than the whole Plan Period. Accordingly, this Local Plan places a reduced weight on 2035 forecasts.



Figure 11.1 Retail in Waltham Forest

**Policy 38**

**Hierarchy of Centres**

The borough's network of designated centres, as identified below, will be protected and enhanced in order to provide a sustainable distribution of town centre facilities and services to support local communities and deliver 15 Minute Neighbourhoods. The borough's designated town centre hierarchy is as follows:

- A. **Major Centre - Walthamstow Town Centre.** This is the borough's principal and economic hub. The role of Walthamstow Town Centre will be reinforced by focusing investment in major comparison retailing activities, leisure, cultural and tourist and other main town centre uses including offices, workspace and complementary evening and night-time uses;
- B. **District Centres - North Chingford, South Chingford, Highams Park, Wood Street, Bakers Arms, Leyton, and Leytonstone.** District Centres will be the primary focus for development and investment in shops, services, leisure and complementary community uses. A mix of uses will be supported to ensure the development of vibrant centres which meet the needs of the local communities that they serve;

- C. **Neighbourhood Centres - Sewardstone Road, Hatch Lane, Chingford Mount Road, Forest Road, Blackhorse Lane, Markhouse Corner, Francis Road, and Thatched House.** These centres will be the focus for smaller scale retail and town centre services and facilities appropriate to their role and function, which is to serve the everyday needs of local communities;
- D. **Local Retail Parades** - These form the lowest tier in the hierarchy and consist of small clusters/parades of shops containing at least five units which serve their immediate catchment area for local convenience shopping needs. These are defined on the Policies Map. Their role in providing local neighbourhood shopping and supporting facilities will be protected.

**11.5** Waltham Forest has a well-established network of designated centres, made up of Walthamstow Town Centre (as the borough's Major Centre), District and Neighbourhood Centres and Local Retail Parades. The borough's network of designated centres are not just focal points for shopping and services, but also hubs for people to work, live and socialise. In planning for inclusive growth, the borough's designated centres will need to evolve and adapt to meet new challenges and become successful and attractive destinations for shopping, employment, entertainment and leisure activities. The NPPF requires Local Plans to define a network and hierarchy of designated centres that is resilient to anticipated economic changes. Policy 38 'Hierarchy of Centres' accords with the NPPF and the London Plan by defining the centres within Waltham Forest's town centre hierarchy and setting out the locational priorities for directing growth to individual centres in the hierarchy.

**11.6** It is also necessary to protect these designated centres and parades to safeguard the provision of town centre services and facilities for local residents, businesses and visitors to the borough. These centres have developed over many years and will need to be invested in and improved to perform their respective roles successfully.

**11.7** Walthamstow Town Centre is the primary retail centre and economic heart of the borough. District Centres have a more localised role and provide reasonably sized facilities for main and bulk convenience food shopping and a reasonable range of comparison shopping facilities. These centres have some small to medium or large food store anchors together with some comparison shopping. This Plan seeks to reinforce their role by ensuring the provision of appropriate local shopping, leisure and community facilities to make them the hub of everyday life for the communities they serve.

**11.8** Neighbourhood Centres provide local convenience shopping facilities for local residents within walking distance of their homes. They should be the hub for other facilities provided in and around them, such as small office and service uses, schools, doctors' surgeries, community centres and open space. Neighbourhood Centres are expected to provide uses and facilities commensurate with their scale and function within the hierarchy.

**11.9** Local Retail Parades comprise small groupings of shops within one or two parades often including newsagents, general grocery stores, sub-post offices and occasionally pharmacies, hairdressers and/or other small shops of a local nature. These parades serve immediate local needs only and provide primarily convenience goods within residential,

commercial or mixed use areas. To create more sustainable development forms, including 15 Minute Neighbourhoods, careful management of local retail parades will be necessary to encourage the development of appropriate groupings of local shops and facilities.

**11.10** In Waltham Forest, the designated centres comprise of the following:

<b>Major Centre</b>	<b>Walthamstow Town Centre</b>
<b>District Centres</b>	North Chingford South Chingford Highams Park Wood Street Bakers Arms Leytonstone Leyton

<p><b>Neighbourhood Centres</b></p>	<p>Sewardstone Road                  Hatch Lane                  Chingford Mount Road                  Forest Road                  Blackhorse Lane                  Markhouse Corner                  Francis Road                  Thatched House</p>
<p><b>Local Retail Parades</b></p>	<p>Hall Lane                  Billet Road                  Chingford Road                  Carr Road                  Higham Hill Road                  Bell Corner                  Whipps Cross Corner                  Queens Road                  Grove Road                  Orford Road                  Colworth Road                  Vicarage Road                  Grove Green Road                  Hainault Road                  Leytonstone High Road                  Leyton High Road                  Cann Hall Road                  Lea Bridge Road</p>

Table 11.1 Hierarchy of Centres

**Policy 39****New Retail, Office and Leisure Developments**

The designated centres as listed under Policy 38 'Hierarchy of Centres' will be the preferred locations for new retail, office, workspace, leisure and cultural/tourism, entertainment, hotel, community and other service uses. Development proposals will be supported where the scale of development is appropriate to the role and function of the particular designated centre or parade and its catchment.

Proposals for such development on sites outside designated centres will only be supported where it can be demonstrated that:

- A. All in-centre options (in Walthamstow Town Centre, the District and Neighbourhood Centres) have been thoroughly assessed for their availability and suitability in accommodating new development;
- B. Where it has been demonstrated that there are no available or suitable in-centre sites, preference has been given to edge-of-centre locations which are well connected to the designated centre by means of easy pedestrian access;
- C. Appropriate flexibility has been applied with regard to scale and format of proposed operations;
- D. A Retail Impact Assessment has been undertaken for proposals over 2500sqm, and this shows that there would be no adverse impact on the vitality and viability of nearby designated centres and parades as well as no adverse impact on town centre investment. In exceptional circumstances, where it is deemed unnecessary to undertake a full-scale Retail Impact Assessment, a broader statement of impact will be required;
- E. The scale of provision is justified (as above) and is required to support new residential communities in an area deficient in shopping provision - i.e. there are no shops or community services within a 10-minute walk (approximately 800m).

**11.11** In line with national policy and the London Plan, this policy seeks to direct new investment in main town centres uses (as defined by the NPPF) and other supporting services and facilities to the borough's designated centres.

**11.12** Schemes that are poorly located can detract from quality of life, and compromise the achievement of social and environmental objectives, for example by drawing trade away from existing centres and leading to their decline. The London Plan designates Walthamstow Town Centre as a Major Centre. Accordingly, it is necessary to protect its dominant position and improve its trading performance for shopping activities, particularly higher order comparison goods. This Plan therefore directs the majority of additional retail growth to this centre. In order to deliver 15 Minute Neighbourhoods, additional investment will also be directed to the borough's District and Neighbourhood Centres, subject to available site capacity and wider impact considerations.

**11.13** Locating retail development and other main town centre uses within Walthamstow Town Centre, District and Neighbourhood Centres is the most sustainable way of meeting the needs of borough residents. It helps maximise the accessibility of facilities and promotes linked trips which reduces the need to travel and can increase footfall to the benefit of businesses. The scale and distribution of new retail, leisure or office development will need to be carefully controlled in order to ensure that new facilities do not detract from the success of the borough's designated centres, or make it more difficult for residents, workers and visitors to meet their shopping and leisure needs in a sustainable way.



**11.14** To retain and develop their vibrancy and vitality, the designated centres must have an appropriate mix and balance of uses - not only retail, but also leisure, cultural and service provision. In response to the backdrop of changes in retailing, particularly the continued growth in online shopping, it is necessary to ensure that the borough's centres vary in scale, function and composition of uses. Accordingly, the individual situation of centres will be taken into account when determining planning applications.

**11.15** The sequential approach, as required by the NPPF indicates that Major, District and Neighbourhood Centres are the preferred locations for main town centre uses. This approach indicates that first preference for new developments should be within centres, followed by edge-of-centre locations. Out-of-centre locations should be the last in the order of preference.

**11.16** Proposals for retail or town centre uses in an out of centre location will be required to demonstrate that all other reasonable options have been examined and a broader statement of impact will be required in such cases.

### Retail Impact Assessments

**11.17** The submission of Retail Impact Assessments for retail and leisure developments proposed outside town centres is in accordance with the NPPF. This is an important requirement as part of the validation process of a planning application.

**11.18** Generally, a Retail Impact Assessment is necessary when the proposed development is of a scale likely to have an appreciable impact on the trade of existing or committed retail, leisure and office developments in the surrounding area. The NPPF sets out the scope of impact assessments. It mentions that where an application fails to satisfy the sequential test or is likely to have significant adverse impacts it should be refused. Therefore it is expected that the scope of any such assessment would be agreed with the Council in advance before the impact assessment work commences. Impact assessments will need to take into account the wider cumulative impacts on town centre health and investment where there are commitments (i.e. planning permissions) and development plan allocations for similar types of retail and leisure use in the wider catchment.



**11.19** This Plan sets a local floorspace threshold of 2500sqm, over which proposals will require Retail Impact Assessments. The policy also applies to extensions and the amalgamation of existing retail units which would result in the creation of a single unit exceeding 2500sqm. It also applies to Section 73 and Section 106A applications to vary conditions associated with planning permissions.

**11.20** This threshold is considered necessary to implement the Council's planning objective to consolidate town centre activities in designated centres, support the vitality and viability of the designated centres and manage the proliferation of retail and other town centre uses throughout the borough. In applying this threshold, the Council will ensure that vulnerable centres/local parades do not experience further decline from trade diversion arising from the development of out-of-centre retail, leisure and office developments.

**Policy 40****Revitalisation, Adaptation and Regeneration in Designated Centres and Parades**

Development proposals involving the revitalisation, adaptation and regeneration of the borough's designated centres/retail parades and other non-designated areas will be encouraged where they seek to achieve the following planning objectives:

- A. Consolidation of retail activities within compact retail core areas of the borough's designated centres;
- B. Safeguard the provision of town centre services and facilities in sustainable locations to ensure that residents can meet most of their needs within short walking distance (10 minutes or 800 metres) or a bicycle ride (up to 15 minutes) from homes;
- C. In locations where retail or commercial demand no longer exists (as evidenced by vacancies), the conversion of retail and other commercial premises to appropriate alternative uses such as housing, business, leisure, entertainment uses and community uses, subject to other policies of this Plan;
- D. Conversion of vacant upper floors of ground floor commercial buildings for housing purposes, where a high quality living environment offering good levels of residential amenity, low noise levels, safe streets and personal security can be created without impeding the development of primary town centre uses such as retail, office and leisure;
- E. Conversion or subdivision of vacant commercial floor space to provide flexible adaptive units for occupation by smaller business units with adequate servicing;
- F. The development of meanwhile and temporary uses with space provision for small business, art, performance and exhibition as well as for educational and vocational projects and activities;
- G. Alignment with town centre strategies and Area Frameworks to deliver positive change, improve business confidence and encourage investment from private and public sectors;
- H. Promotion of local distinctiveness with regard to the 'offer' of individual centres, their place setting and the development of differentiated niche roles; and
- I. Ensuring that replacement uses are well integrated (in function and design) with the remaining frontage to manage the impact of change on townscape character and neighbouring amenity.

**11.21** There are a number of retail and commercial premises outside the designated centres and parades, particularly along the main road corridors of the borough including Forest Road, Chingford Mount Road, Lea Bridge Road, Hoe Street, Leyton High Road and Leytonstone High Road. The current challenges facing the retailing industry, including the growth of online shopping, and changing shopping patterns, could lead to significant vacancies in some frontages. This policy seeks to manage retail decline by consolidating retail activities within compact retail core areas of the designated centres and parades and also encouraging alternative uses in declining areas that may occur through the process of change.

**11.22** Residential development appropriately located in designated centres - for example on the upper floors of shops and other commercial buildings in town centres - has an important role to play in complementing new and existing retail and commercial uses. The provision of an appropriate mix of uses, both within areas and in individual buildings, has positive benefits for the borough's designated centres. A mix of uses on individual sites and across an area will support vitality and viability and promote the creation of successful places.

**11.23** This policy also seeks to encourage the development of flexible and adaptable units and meanwhile uses. These uses will help manage vacancy levels in the designated centres. Temporary uses can range from pop-ups to short term lets. These can make the best use of vacant properties and land to stimulate vibrancy, vitality and enhance the character of the borough's designated centres.

### Other Initiatives

**11.24** Building on current Town Teams and Business Forums, the Council will continue to seek to engage and involve local residents and businesses to improve and invest in our town centres and high streets.

**11.25** The development of distinctive centres, each with a unique 'offer' in terms of the range of activities and place setting is particularly necessary to support the vitality and viability of the borough's town centres. This policy seeks to encourage a greater degree of differentiation and specialisation between centres and avoid competition with regard to the types/nature of activities offered and to create a more diverse offer in different places.



**11.26** The policy also seeks to ensure that satisfactory standards are achieved in terms of how new uses are integrated in both function and design with adjoining uses along commercial and shopping frontages. This particularly relates to areas of change or renewal, where shops are declining and being replaced by alternative uses. In such areas, it is particularly important to ensure that proposals contribute to the general appearance and character of the area, especially at street level.

**11.27** Accordingly, in determining planning applications, the impact of the proposed use on the character and function of the parade or frontage in which it is located will be important considerations. That includes how well - in terms of design and appearance - the proposed use can be integrated within the existing street block or frontage. The nature of the proposed use and any implications on neighbouring amenity will be equally important considerations.

**11.28** In some situations, responsive design solutions will be necessary to ensure satisfactory integration. For example, it will be important to ensure that conversions to residential uses - where they align with the policies of this Plan and any other local planning guidance or directions - are coordinated and well managed. Without such an approach,

businesses in predominantly commercial frontages, who find themselves next to a newly converted new home may face complaints from residential neighbours regarding noise, traffic, or other issues.

### Managing Changes of Use in Designated Centres

**11.29** This section sets the policies that will apply in managing changes of use within and outside the designated centres. Well managed changes of use can bring positive regeneration benefits. National permitted development rights play an important role in helping high streets adapt to changes in how people shop and use the high street. The impact of online retailing on shopper behaviour and its consequences for town centres and high streets has been evident in recent years nationally and locally. Government policy in the NPPF acknowledges the need for greater flexibility for changes of use to occur in high streets and town centres by allowing existing premises to change to a wider range of uses.

**11.30** The Town and Country Planning (Use Classes) Order 1987 (as amended) puts uses of land and buildings into various categories known as 'Use Classes'. In 2020, the Business and Planning Act significantly changed the Use Classes Order, introducing a broad category of 'commercial, business and service' uses, known as Class E, along with Class F 'community and learning'. The new Class E effectively amalgamated previous Class A1 (retail), Class A2 (financial and professional services), Class A3 (restaurants/cafes), Class B1 (offices) along with health/medical uses, creches, nurseries (all formerly D1 uses) and indoor sports/recreation (formerly D2 use). Under permitted development rights, planning permission is not required to change between any of the uses within the new Class E, or between Class E and Class C3 (dwellinghouses). The policies in this section of the Plan apply where planning permission is required for a change of use.

**11.31** The Council can make Article 4 Directions to remove certain permitted development rights in all, or part of, its area. The effect of an Article 4 Direction is that planning permission is required for certain types of development that would not otherwise require it. The Council has Article 4 Directions in place, including one to remove specified permitted development rights for the change of use of a building and any land within its curtilage from a use falling within Class E (commercial, business and service) to a use falling within Class C3 (dwellinghouses) in specified geographic areas across the borough.

**Policy 41****Managing Changes of Use In and Outside Primary Shopping Areas**

## In Primary Shopping Areas

- A. Proposals for town centre uses will be encouraged in the Primary Shopping Areas of Walthamstow and the District Centres (see Policies Map). Other uses will be supported where they maintain the continuity of active frontages on ground floors and make a positive contribution to the vitality and viability of a centre by attracting a significant number of shoppers/visitors.

## Outside Primary Shopping Areas

- B. Outside the Primary Shopping Areas of Walthamstow Town Centre and the District Centres, a diverse range and mix of town centre uses will be encouraged at ground floor level where:
- i. They contribute to the vitality and viability of the particular frontage and the designated centre generally;
  - ii. They provide non-retail services and other town centre uses (such as cinemas, restaurants, bars and pubs, night-clubs, health and fitness centres, offices, banks, estate agents, arts/culture facilities, hotels, health/community uses, etc) of appropriate scale to the particular centre; and
  - iii. They extend the offer and range of services and activities available to enhance shoppers' or visitors' experience of the centre.

**11.32** Primary Shopping Areas are identified at the heart of the borough's designated centres. The Council considers it necessary to prioritise investment in these areas and protect and consolidate their existing uses in order to support their vitality and viability. The policies map shows the extent of these areas, reflecting the combined areas of primary and secondary frontages as included in the previous plan. These generally represent areas that are well connected, contiguous and in predominantly retail use.

**11.33** Policy 41 'Managing Changes of Use In and Outside Primary Shopping Areas' aims to ensure that Walthamstow Town Centre (the borough's only designated Major Centre) and the District Centres continue to fulfil their primary role of providing convenient and accessible shopping and town centre facilities within reasonably compact areas. Government policy, as contained in the NPPF, requires planning policies to define the extent of town centres and Primary Shopping Areas and make clear the range of uses permitted in such locations, as part of a positive strategy for the future of each centre.

**11.34** The distinction between the Primary Shopping Area and the town centre boundary is particularly important in providing guidance on the appropriate location for different town centre uses. Accordingly, Class E uses<sup>(13)</sup> should first be directed to the Primary Shopping Areas. Outside these areas, and within the town centre boundary generally, all other town centre uses including those in Class F1 and F2<sup>(14)</sup> will be encouraged. The policy approach seeks to allow individual applications to be assessed on their own merits. A good mix of uses is needed within the Primary Shopping Areas to contribute to vibrant centres.

**11.35** Outside the designated Primary Shopping Areas there are opportunities for encouraging a greater diversity of uses. These areas are important for some types of activities requiring town centre locations. Accordingly, a range of uses will be supported in these locations. Policy 40 'Revitalisation, Adaptation and Regeneration in Designated Centres and Parades' and Policy 41 'Managing Changes of Use In and Outside Primary Shopping Areas' seek to encourage complementary services and facilities in all designated centres. This approach seeks to generate footfall and linked trips to all parts of each centre. Appropriate uses include those listed under the policy, but are not confined to just these. Acceptable uses must be of a scale appropriate to serve the local catchment, and designed in accordance with Policy 45 'Shopfronts and Signage'. The acceptability of uses will be subject to compliance with other policies in this Plan. In particular, they should not give rise to unacceptable impacts on the living and working conditions of neighbours or occupiers in the surrounding area, in accordance with Policy 57 'Amenity'.

13 The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020

14 The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020

**Policy 42****Managing Changes of Use in Neighbourhood Centres and Local Retail Parades**

Within Neighbourhood Centres and Local Retail Parades, a diverse range of town centre uses will be encouraged to predominate on ground floors. The loss of existing commercial units (where planning permission is required) will only be permitted where all of the following criteria are met:

- A. Local residents would still have a reasonable range and choice of essential shops and services in the designated centre or parade, or in a nearby designated centre or parade within a reasonable walking distance;
- B. The replacement use could be considered beneficial to the local community, or provide locally distinctive community services that serve local residents and nearby communities;
- C. The retail unit has been vacant for a continuous period of at least six months and there is marketing evidence demonstrating the advertisement of the unit on reasonable and realistic terms; and
- D. The proposed use would contribute to the vitality and viability of the particular frontage and centre generally.

**11.36** Policy 38 'Hierarchy of Centres' sets out the hierarchy of centres. This includes Neighbourhood Centres and Local Retail Parades. Neighbourhood Centres represent local activity hubs for retail and other town centre activities. It is necessary to protect these designated areas in order to provide accessible shopping facilities for all local residents and the creation of 15 Minute Neighbourhoods across the borough.

**11.37** To minimise the need to travel, ideally all residential properties should be within a reasonable walking distance of a full range of essential shops. However, the Council accepts that it may not be possible to retain all shops in the borough as the viability of retail uses depends on many other economic factors. Where there is sufficient population to support retail uses however, the policy seeks to safeguard them - particularly those that are reasonably sized with adequate servicing facilities. Retention of such uses will help to attract new retailers and therefore contribute to the provision of a good range of essential shops.



**11.38** Local Retail Parades are smaller activity hubs where retail activity is more dominant. They often have key footfall-generating features or retail 'anchors' and contain the minimum number or range of shops which the Council considers necessary to enable the centre to perform its local shopping role. The protection of these parades is particularly important to meet

day-to-day shopping needs. Where planning permission is required, this policy therefore seeks to generally resist proposals that would result in the loss of shops within designated parades.

**11.39** Essential shops to meet day-to-day shopping needs can include the sub-post office, chemist, greengrocer, baker, and newsagent. Policy 42 'Managing Changes of Use in Neighbourhood Centres and Local Retail Parades' is intended to ensure that the character, vitality and vibrancy of local retail parades is maintained. Where possible, in order to maintain the vitality and vibrancy of local retail parades, a continuous grouping of at least 4 standard sized commercial units should be retained in the relevant frontage. Whether the parade contains sufficient essential shop uses will depend on its size and function within the shopping hierarchy and the extent to which alternative retail provision exists within a convenient walking distance to serve the surrounding residential area.

**11.40** In implementing this policy, it is accepted that there may be situations where the retention of a shop or service may be impossible for economic reasons or a lack of control arising from the Use Classes Order. This policy will therefore be applied flexibly - the overriding objective being to ensure that the surrounding area is not deficient in essential local shops such that residents' ability to meet their day-to-day shopping needs is seriously compromised. As a guide, this may be the case if they need to walk more than a 10 minute distance by foot (800m) to the nearest facility. Accordingly, the number and range of uses within the nearby local area will be an important consideration.

### Policy 43

#### Managing Changes of Use in Non-Designated Areas

Outside the designated centres of Walthamstow Town Centre, the District and Neighbourhood Centres, and designated Local Retail Parades, the Council will support changes of use involving the loss of town centre uses. As a general approach (where planning permission is required), the Council will ensure that:

- A. Local residents would still have access to local shops within a reasonable walking distance;
- B. The replacement use would be beneficial to the local community and contribute to the Council's aspirations and priorities, in particular, the regeneration objectives for the local area and the delivery of 15 Minute Neighbourhoods;
- C. Along commercial frontages (at ground floor/street level), active uses (those that can operate with display windows and shop fronts and create activity and interest directly related to passing pedestrians) will be maintained;
- D. Where ground floor housing conversions may be justified as replacement alternative uses, they relate to frontages or locations where commercial activity has significantly declined and the proposal is part of a scheme involving a group of properties in the street block or parade.



**11.41** In a changing economic climate, it is expected that some shops and other commercial activities in marginal trading locations will be converted to other uses. In seeking to consolidate retail and town centre activities in the designated centres and parades, it may be necessary to manage decline elsewhere in the borough, particularly in non-designated frontages and parades. Many of these areas have been characterised by a proliferation of retail and commercial activities stretching in long lengths along the main road corridors such as Lea Bridge Road, Hoe Street, Leytonstone High Road and Leyton High Road.

**11.42** The structural changes currently taking place in the retail industry as a result of the growing influence of internet shopping are expected to reduce the demand for retail properties generally, particularly those in marginal trading locations. Accordingly, this policy seeks to support changes of use of such properties to other alternative uses. However, the policy also acknowledges the important role of corner shops.

**11.43** The corner shop is the old faithful of any neighbourhood. It is particularly important for the elderly and people with disabilities who cannot easily travel for top up convenience goods. Accordingly, corner shops need to be protected. In managing changes of use, this policy seeks to ensure that residents' access to these facilities are not compromised to the extent that they are completely lost. In considering changes of use, the Council will ensure that residents in the local catchment area of the proposal can conveniently walk to other nearby shops or parades.

**11.44** Changes of use in non-designated locations can often entail the removal of former shopfronts and the construction of new ground floor frontages. This policy seeks to ensure that satisfactory standards are achieved in terms of how the proposed use is integrated with adjoining uses in both function and appearance.

**Policy 44****Evening and Night-Time Economy Uses**

Proposals for evening and night-time economy uses that contribute to the vitality and viability of the borough's designated centres - in particular, Walthamstow Town Centre - will be encouraged where:

- A. They are part of a strategic approach to delivering and managing cultural and food and drink uses in the designated centres and/or supporting the creation of a balanced provision of evening and night-time uses;
- B. The design of the development particularly focuses on public safety, crime prevention and the reduction of anti-social behaviour;
- C. Active day-time uses are also proposed and/or proposals make a positive contribution to active frontages and do not detract from the character and amenity of the surrounding shops and services;
- D. There will be no significant individual or cumulative adverse effect on the surrounding residential amenity due to noise, traffic, parking, general disturbance or problems of disorder and nuisance;
- E. Arrangements for mitigating pollution including ventilation equipment, refuse disposal, grease traps and noise insulation is provided in a way that minimises visual and environmental impact; and
- F. Inclusive access is provided.

**11.45** The evening and night-time economy has been growing over many years. When well-managed, it can support the vitality and viability of the borough's designated centres and become part of a specific centre's image and atmosphere, as well as creating jobs, increasing footfall, and providing opportunities to showcase a wide range of ever-changing arts and cultural events.

**11.46** Walthamstow Town Centre is identified in the London Plan (Table A1.1), as having a night-time economy classification of NT2 (regional or sub-regional significance), with medium commercial growth potential and high residential growth potential. Accordingly, evening and night-time economy uses will be particularly promoted and encouraged in this centre. Other centres and locations will also have a supporting role by providing smaller scale activities subject to site specific development opportunities.

**11.47** Planning positively for a range of complementary evening uses, including arts, culture and entertainment uses such as cinemas, theatres, restaurants, bars and nightclubs that appeal to a wide variety of people will support the vitality and viability of the borough's centres, subject to careful coordination and management, including consideration of cumulative effects.

**11.48** In most cases, a strategy will be required to provide guidance on the scale of evening and night-time activities proposed, and how they would be managed - including an integrated policy approach to complement the Council's Statement of Licensing Policy. The creation of Cultural Quarters, such as that proposed by the Council at the eastern end of the High Street in Walthamstow Town Centre, provides a mechanism for planning, transport, policing and licensing systems to support the management of the evening and night-time economy together.



**Policy 45****Shopfronts and Signage**

Permission will be granted for new shop fronts and signs which comply with all of the following:

- A. The design is related to the scale, proportion and appearance of the host building and respects the character of the area or parade where the proposal is located;
- B. The design is in-keeping with standards for the local area or parade as being promoted under relevant shopfront improvement schemes;
- C. The design retains and/or where practicable provides a separate entrance to upper floor accommodation (where this is separate from the ground floor use);
- D. Principal entrances to upper floor accommodation avoid the rear of buildings, where practicable, as this can give rise to personal safety and security issues;
- E. The design incorporates measures to improve or maintain access for all users; and
- F. An appropriately designed shutter is provided (where necessary).

Applicants should note that there are additional controls relating to advertisements and signs in Conservation Areas.

**11.49** Design and environmental quality issues are important to town centre vitality and viability. Shopfronts play a key part in establishing and defining the visual character of high streets and shopping parades. In managing necessary changes to shopfronts, the effect of alterations and changes of use on the streetscene and the potential for the successful residential use of upper floors will be important considerations.



**11.50** In most cases, shop style window displays are necessary to protect the townscape and street scene of commercial/shopping areas. Window displays help to maintain the attractiveness and continuity of the shopping frontage and can provide information for users and visitors. In support of this policy, further guidance is provided in the Shopfront Design Supplementary Planning Document (SPD).

**11.51** Shopfront improvement schemes provide the opportunity to improve the appearance of local areas as a means of supporting the growth of local businesses and raising the image of the town centres. To safeguard the protection of such shopfronts, the Council will take necessary enforcement action to ensure compliance with the design objectives for the scheme area. As required by the Equalities Act (2010), inclusive access to shops must be given

special consideration in shopfront design. The Council expects proposals to include design measures to ensure that access to and circulation within shops is possible for all members of the public.

### Implementation

**11.52** The main tool the Council has in delivering the policies in this section of the Plan is through the planning application process. This will be complemented by a range of implementation actions and initiatives including the following:

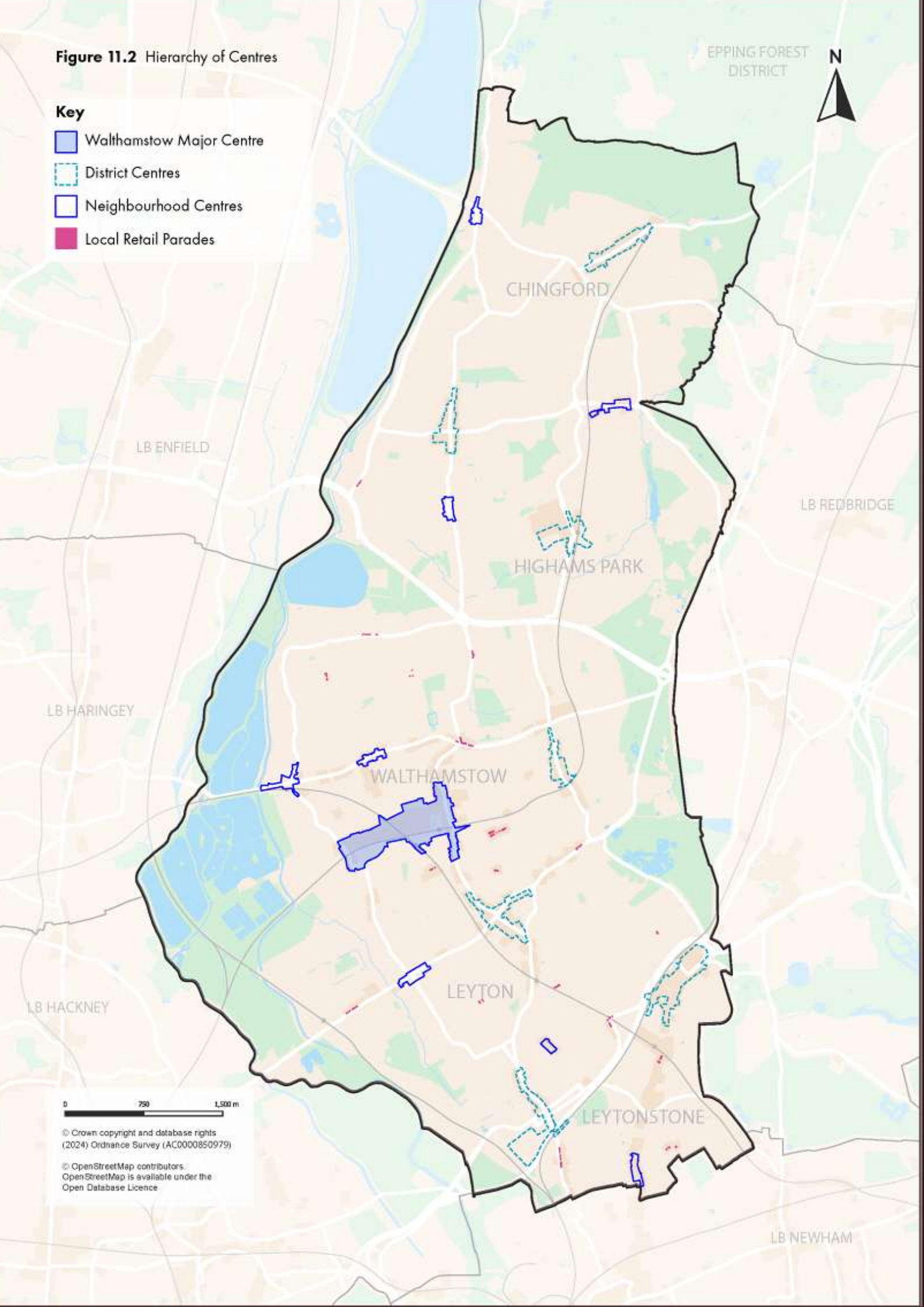
- The ongoing review and drafting of, and consultation on, Area Frameworks and the preparation of town centre strategies;
- The establishment of a Cultural Quarter at the eastern end of the High Street in Walthamstow Town Centre;
- Securing funds, where possible, for investment in town centres to improve the environment (for example, Levelling Up funding secured for Walthamstow Town Centre, South Chingford District Centre and Highams Park District Centre);
- Partnership working to ensure an integrated approach to the management and successful operation of the designated centres;
- Supporting businesses to invest and relocate within town centre areas;
- The use of Local Plan Part 2 - Site Allocations to identify site specific opportunities for redevelopment of town centre uses as part of mixed use development proposals;
- Working with Town Teams and Business Forums to engage and involve local residents and businesses in the future of town centres and high streets;
- Where necessary, and if feasible, the Council will consider further direct involvement in the development of retail opportunities in town centres;
- The use of developer contributions to improve linkages within Primary Shopping Areas and to designated centres;
- Use of the Council's Statement of Licensing policy to complement the application of planning policies on changes of use; and
- Review of the Shopfront Design SPD to provide further guidance on shopfront improvements (where necessary).

**11.53** This Plan makes provision for Neighbourhood Plans for local areas (as may come forward under the Localism Act 2011) to set their own requirements to revise the boundaries of Primary Shopping Areas and the mix and balance of uses within them, provided the effect of introducing new or additional requirements would not deter development but would support the vitality and viability of the designated centres.

**Figure 11.2** Hierarchy of Centres

**Key**

-  Walthamstow Major Centre
-  District Centres
-  Neighbourhood Centres
-  Local Retail Parades



0 750 1,500 m

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## Social and Community Infrastructure

### Strategic Objective

Ensure timely, strategic and local infrastructure investments and delivery to support good sustainable growth for communities both now and in the future, through working with partners, investors, developers and providers.

**12.1** It is important that new development in Waltham Forest is supported by appropriate social and community infrastructure. Providing and improving access to such facilities greatly improves the quality of life for residents, builds strong communities and helps to address inequalities and social exclusion. It is also fundamental to the delivery of successful 15 Minute Neighbourhoods.

**12.2** Social and community infrastructure covers a broad range of facilities including schools and childcare facilities, health services, places of worship, libraries, youth and other community facilities, sport and leisure facilities, public houses, events and cultural facilities and policing amongst others, all of which contribute to the quality of life and well-being of the borough and its residents. The protection, enhancement and provision of additional social and community infrastructure is supported by policies in the London Plan and the National Planning Policy Framework (NPPF).

**12.3** The Council, working in partnership with other local stakeholders, has a good track record of securing external and central government funding to help deliver infrastructure. The Council will continue to work proactively with its various partners, stakeholders and communities to seek to secure additional infrastructure funding where available to support the sustainable growth of the borough and London as a whole.

### Policy 46

#### Social and Community Infrastructure

- A. Proposals for new or improved social and community infrastructure will be supported where they satisfy the following criteria:
- i. The proposal is required to meet current and projected identified need, where relevant, in accordance with Policy 47 'Education and Childcare Facilities';
  - ii. The location is easily accessible by sustainable and active modes of transport such as walking, cycling and public transport for both staff and users;
  - iii. The proposal is of high quality and inclusive design, providing access for all in accordance with the design policies of this Plan (see 'Creating High Quality Places');
  - iv. Where appropriate, the proposal provides flexible and adaptable spaces permitting co-location of other forms of social and community infrastructure in the same building;

- v. Where appropriate, the proposal maximises the availability of the facility to the community through evening and weekend opening; and
  - vi. The proposal will not result in unacceptable environmental impacts.
- B. Community facilities should be incorporated into mixed use proposals, where they meet an identified need.
- C. New development will be required to contribute towards the provision of additional social and community infrastructure to accommodate and mitigate any impact on existing provision.
- D. Proposals involving the loss of existing social or community infrastructure will not be permitted unless the following criteria are met:
- i. It can be demonstrated that adequate alternative facilities which meet the needs currently being met by the existing facility are available within walking distance, without leading to a shortfall in provision for the specific type of social or community infrastructure in the area; and/or
  - ii. It can be demonstrated that the facility is no longer required in its current use and cannot viably accommodate other forms of social or community infrastructure.
- E. In the event that D (i) and/or D (ii) is met, evidence must be submitted to demonstrate that the loss of the facility in question would not create, or add to, a shortfall in provision for this specific type of social or community infrastructure in the borough, and demonstrate that there is no demand for any other suitable social infrastructure use on the site. The applicant must demonstrate that all reasonable efforts have been made to preserve the facility and site to meet identified local need. Evidence required includes, but is not limited to, 24 months marketing evidence. The length and scope of marketing evidence required may vary according to specific circumstances and should be agreed with the Council.

**12.4** With the population projected to grow in Waltham Forest, to meet the needs of both existing and future residents, this Plan seeks to protect and enhance existing community and social infrastructure and provide new facilities. This will include supporting improvements to existing facilities and encouraging more efficient and intensive use of existing sites. Where appropriate, co-locating multiple facilities on a single site can be an efficient way to improve both quality and accessibility.

**12.5** Where community facilities are provided, the Council will seek to secure community benefits through sharing schemes and joint user agreements where suitable and appropriate.

**12.6** The Local Planning Authority works closely with other Council services such as Public Health, Highways, Waste and Parks to develop, implement and monitor the delivery of new and improved infrastructure. The Local Planning Authority also works closely with external partners including the NHS North East London<sup>(15)</sup>. The Council will continue to work in partnership with all relevant services and organisations to ensure that the infrastructure that is needed is provided in the most suitable locations and at the right time. Over the lifetime

15 [NHS North East London](#)



of the Plan it is very likely that there will be more changes in the ways that health and other public services are delivered and provided. Close partnership working will therefore be essential to ensure that communities continue to have the best possible access to the facilities they need.

**12.7** The Council maintains an annually updated Infrastructure Delivery Plan (IDP) to assess the types, quantities and locations of the infrastructure provision that currently exists, and that which is needed to meet future needs.

**12.8** Development proposals are expected to mitigate any site specific impacts on local infrastructure by way of Section 106 and/or Section 278 Highways legal agreements. The majority of planning permissions in the borough are also liable for a Community Infrastructure Levy (CIL) payment towards the funding of infrastructure. The Council will continue to work with a range of partners and organisations to prioritise and allocate the financial contributions secured from development and, where possible, use such funds to leverage further capital and revenue investment, from both the public and private sources, by way of match funding. Further guidance will be provided in the Developer Contributions Supplementary Planning Document (SPD).

**12.9** The Council will work with all relevant stakeholders to encourage the design of flexible community facilities that can accommodate a range of needs and, where appropriate, enable wider community access - for example weekend and evening access to sports facilities in schools and colleges. Additional analysis will also be undertaken to identify infrastructure needs on a more localised basis to better understand the evolving needs arising for specific groups, particularly those with protected characteristics.

**12.10** Where social or community facilities could be lost, applicants will be required to provide robust evidence that the site has been marketed for at least 24 months, that the form of the marketing has been appropriate, and that, despite best endeavours, no tenant (or purchaser) interested in using the site or floorspace for a social or community use can be found.

### Education and Childcare Facilities

**12.11** Waltham Forest has a Statutory Duty to:

- Ensure sufficient school places (Section 4 (1) Education Act 1996 as amended)<sup>(16)</sup>;
- Increase opportunities for parental choice (Section 2 of the Education and Inspectors Act 2006<sup>(17)</sup>, Education Act 1996 as amended);
- Comply with any preference expressed by parents provided compliance with the preference would not prejudice the provision of efficient education or the efficient use of resources (Section 86 Schools Standards and Framework Act 1998<sup>(18)</sup>); and
- Ensure fair access to educational opportunity (Education Act 1996 as amended).

16 <https://www.legislation.gov.uk/ukpga/2006/21/schedule/2/crossheading/education-act-1996-c-56>

17 <https://www.legislation.gov.uk/ukpga/2006/40/contents>

18 <https://www.legislation.gov.uk/ukpga/1998/31/contents>

**12.12** Paragraph 95 of the NPPF states that 'it is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local Planning Authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:

- a. give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and
- b. work with school promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.'

**12.13** The London Plan states that in order 'to ensure there is a sufficient supply of good quality education and childcare facilities to meet demand and offer education choice, Boroughs should:

- (1) identify and address local needs and any shortages in supply, both locally and sub-regionally, including cross-boundary issues
- (2) identify sites for future provision through the Local Plan process, particularly in areas with significant planned growth and/or need
- (3) ensure that development proposals for housing and commercial facilities incorporate suitable childcare provision and encourage nursery provision within primary schools, where there is a need'.

**12.14** The Local Authority has the general responsibility for education, as defined in the Education Act 1996<sup>(19)</sup>, which states that the local authority shall (so far as their powers enable them to do so) contribute towards the spiritual, moral, mental and physical development of the community by securing that efficient primary education and secondary education and further education are available to meet the needs of the population of their area (Section 13).

**12.15** Section 14 (Functions in respect of provision of primary and secondary schools) goes on to state that the local authority shall secure that sufficient schools for providing primary and secondary education are available for their area; and that the schools available for an area shall not be regarded as sufficient unless they are sufficient in number, character and equipment to provide for all pupils the opportunity of appropriate education. "Appropriate education" means education which offers such variety of instruction and training as may be desirable in view of (a) the pupils' different ages, abilities and aptitudes, and (b) the different periods for which they may be expected to remain at school, including practical instruction and training appropriate to their different needs.

**12.16** The Local Plan supports the exercise of the Council's statutory functions, as both Local Planning Authority and Local Education Authority. As set out above, it seeks to (a) secure diversity in the provision of schools, (b) increase opportunities for parental choice, (c) secure special educational provision for pupils who have special educational needs and (d) make alternative provision for pupils at risk of exclusion or unable to attend school due to illness, or excluded from school for more than six days.

19 <https://www.legislation.gov.uk/ukpga/1996/56/contents>

**Policy 47****Education and Childcare Facilities**

- A. Development proposals for new education or childcare facilities in the borough will be supported:
- i. Where population change and growth require its provision:
    1. In areas of need as identified through annual reviews of the Infrastructure Delivery Plan;
    2. In accessible locations, with good public transport accessibility and access by walking and cycling;
  - ii. Where entrances and playgrounds are situated away from busy roads especially for early years and primary education facilities;
  - iii. Where they maximise the use of educational facilities for community, recreation or cultural use, through appropriate design measures;
  - iv. Where encouragement is given to the shared use of services between schools, colleges, universities, sports providers, community and cultural facilities;
  - v. Where they are designed to be accessible and inclusive to meet the needs of a range of users, including disabled people; and
  - vi. Where they are designed to incorporate safe, suitable and accessible outdoor space.
- B. Development proposals that would result in a loss of education or childcare facilities will not be supported, unless it can be demonstrated that there is no ongoing or projected future demand.

**Early Years**

**12.17** Local Authority responsibilities under the Childcare Act 2006<sup>(20)</sup> include a duty to undertake an assessment of the sufficiency of local childcare provision. From 1st September 2008, Section 7 of the Childcare Act 2006 placed a legal duty on local authorities in England to secure free early years provision for eligible two, three and four year-olds (and five year-olds who are not yet of compulsory school ages)<sup>(21)</sup> in their area. All three and four year-olds and 40% of two year-olds (subject to meeting criteria) are entitled to 15 hours of free nursery education for 38 weeks of the year. This applies until they reach compulsory school age (the term following their fifth birthday). Free nursery education can be delivered by public or private sector providers and parents can pay for additional hours or services.

20 <https://www.legislation.gov.uk/ukpga/2006/21>

21 <https://www.gov.uk/find-free-early-education>

**12.18** The statutory requirements imposed through the Apprenticeship, Skills, Childcare and Learning Act 2009<sup>(22)</sup> mean that the Council must ensure that there is sufficient provision of not only early education places, but also children's centres.

**12.19** From 1st September 2017, Section 1 of the Childcare Act 2016<sup>(23)</sup> placed a legal duty on the Secretary of State to secure additional free early years provision for eligible parents and carers of three and four year-olds (and five year-olds who are not yet of compulsory school age) in their area. Eligible families will be entitled to an additional 15 hours of free nursery education for 38 weeks of the year in addition to the existing 15 hours universal entitlement. This duty may be discharged to local authorities under Section 2 of the Childcare Act 2016<sup>(24)</sup>.

### Primary Education

**12.20** As of September 2020, Waltham Forest is home to 53 mainstream schools providing primary education, two of which also provide secondary education. Included in this total are two infant schools and two junior schools. For September 2019, 88% of pupils were offered their first preference school and 97% were offered one of their top three preferences.



**12.21** The main method for calculating primary school requirements in Waltham Forest is the cohort survival method. The base information used for forecasting the number of children entering reception is the number of births within the borough and the number of children in reception classes (obtained from the January School Census for the previous year). The birth figures are provided by the Office for National Statistics (ONS). The birth data from ONS allows the historical uptake factor to be calculated and this represents the

number of children born in the authority who then go on to attend schools in the borough.

**12.22** Once the number for Reception has been projected, survival ratios are then applied to each age cohort as they move through the education system. Cross border movement, both in and out of the borough, is captured within existing transfer rates used to calculate the projections using historic census data and needs are planned for accordingly.

### Secondary Education

**12.23** As of September 2020, Waltham Forest is home to 17 mainstream schools providing secondary education, two of which also provide primary education. For September 2019, 68% of pupils were offered their first preference school and 88% were offered one of their top three preferences.

22 <https://www.legislation.gov.uk/ukpga/2009/22/contents>

23 <https://www.legislation.gov.uk/ukpga/2016/5/enacted>

24 <https://www.legislation.gov.uk/ukpga/2016/5/enacted>



**12.24** Secondary phase historical data is used to calculate the transfer rate from Year Six to Year Seven. A transfer rate of approximately 90% is applied to the Year Six projected rolls to calculate the projected Year Seven intake. This is based in part on a five-year average transfer. In addition, the borough has historically been a net exporter of pupils at Year Seven, but this trend is slowing due to our neighbouring boroughs being less able to accommodate Waltham Forest resident applications than they have

received in the past. The borough's projections support the expected increase in retention rate going forward.

### Further Education (FE) / Post 16



**12.25** Access to Further Education (FE) plays a key role in skills development and life-long learning and assists both residents and businesses progression into, and through, sustainable employment, including apprenticeships. London is predicting an increase in demand for FE provision, due to the growing number of 16-19 year-olds and the new requirement for all young people to remain in learning until they are 18. Meeting this growing demand will require strategic planning, cross

boundary working and a partnership approach. FE institutions also provide valuable community and cultural facilities. The Council will continue to support existing and new FE providers to enhance their colleges and other training facilities through the Mayor of London's Skills for Londoners Capital Fund.

### Special Education Needs & Disabilities (SEND)

**12.26** The borough supports residents with special educational needs and/or learning disabilities aged 0 to 25 years old. The borough is expecting an increase in the number of residents requiring Special Education and Disability (SEND) provision and access to alternative educational provision. Some of this provision will continue to be located within mainstream schools and colleges and some within specialist schools. It is important that all schools are designed to be accessible and inclusive, meeting the highest standards of accessible and inclusive design.

## Delivering New School Places

**12.27** Since 2011, new providers of school places have been able to establish state-funded Free Schools, and now all new schools are deemed to be Free Schools. There are also a growing number of schools that have converted to become Academies, which are independent of Local Authority control.

**12.28** School places are no longer, therefore, solely provided by the Council and the Council works in partnership with these and other providers to ensure that the need for school places is met. However, the Council has the overall responsibility to ensure there are enough school places available for local children.

## School Design Charter

**12.29** The Council's School Design Charter, adopted in July 2018, provides 10 key principles for achieving high quality design in school developments. It also seeks to highlight the Council's commitment to achieving well designed teaching and learning environments that offer out-of-hours facilities for the broader community. The Charter provides guidance for developers, planning applicants, planning officers and other interested parties involved in developing new and existing schools.<sup>(25)</sup>

**12.30** In situations where an area of need may be constrained by poor access to public transport, walking and cycling, the Council's transport policies (Policy 61 'Active Travel' and Policy 62 'Public Transport') will apply – requiring measures to ensure connectivity and integration of the public transport network with other transport modes, including walking and cycling within and outside the borough as aligned with the 15 Minute Neighbourhood principles.

## Funding New School Places and Early Years Provision

**12.31** The system of developer contributions, introduced by the Town & Country Planning Act 1990<sup>(26)</sup> Section 106, ensures that developers meet their obligations to the whole local community. Waltham Forest Council does not have sufficient resources in isolation to construct buildings and other infrastructure to keep pace with the rate of new development. In keeping with the legislation, contributions towards providing additional educational infrastructure have been, and continue to be sought from developers, where they meet the requirements of the Community Infrastructure Levy (CIL) Regulations 2010 (as amended).

## Implementation

**12.32** The main tool the Council has in delivering the policies in this section of the Plan is through the planning application process. This will be complemented by a range of implementation actions and initiatives including the following:

25 [Schools Design Charter Booklet](#)

26 <https://www.legislation.gov.uk/ukpga/1990/8/contents>

- Working with partners such as the Council's Education team and NHS North East London to identify and plan for the borough's infrastructure needs;
- The ongoing review, drafting and consultation on Area Frameworks;
- The annual review of the Infrastructure Delivery Plan (IDP); and
- The Developer Contributions Supplementary Planning Document (SPD).

## Promoting Health and Well-Being

### Strategic Objective

Improve the health and well-being of all who live, study and work in the borough.

**13.1** The places we live, work and play have a direct impact on our health and well-being. It is therefore important for all Waltham Forest residents and businesses to have access to healthy, inclusive and safe environments.

**13.2** The planning system plays a vital role in the health and well-being of the population. It has been estimated by the Department of Health that 60% of health outcomes are determined by socio-economic and physical environments.<sup>(27)</sup> The built environment influences the wider determinants of health and wellbeing as set out in Figure 13.1.

**13.3** In 2022, the Council published a local report by the Marmot Institute about health inequalities affecting our residents<sup>(28)</sup>. Waltham Forest were the first local authority in London to work with Professor Marmot and his team of researchers, asking them to examine the many factors which affect the health and wellbeing of our residents following the Covid 19 pandemic. The report closely focused on:

- Life expectancy and health outcomes;
- Factors that impact on health, like access to housing, food, education and jobs; and
- Residents' views about the factors affecting their wellbeing, including access to health services.

**13.4** The findings highlight that life expectancy for residents in the south of Waltham Forest is up to 7 years lower than in the north. Lea Bridge has the lowest life expectancy and Chapel End has the highest life expectancy. The findings from the report also highlight how this gap in life expectancy and health outcomes can impact on residents leading to issues which can affect their everyday lives such as how they get access to housing, jobs, food and education.

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

**13.6** To support the delivery of healthy environments, local planning authorities work with a range of partners inside and outside the Council via the Health and Well-Being Board. The Waltham Forest Health and Well-Being Strategy 2016-2020 sets out key priorities for the Council as:

27 Department of Health and Social Care, (2019), Advancing our health: prevention in the 2020s.

28 [A Fairer and Healthier Waltham Forest \(2022\)](#)



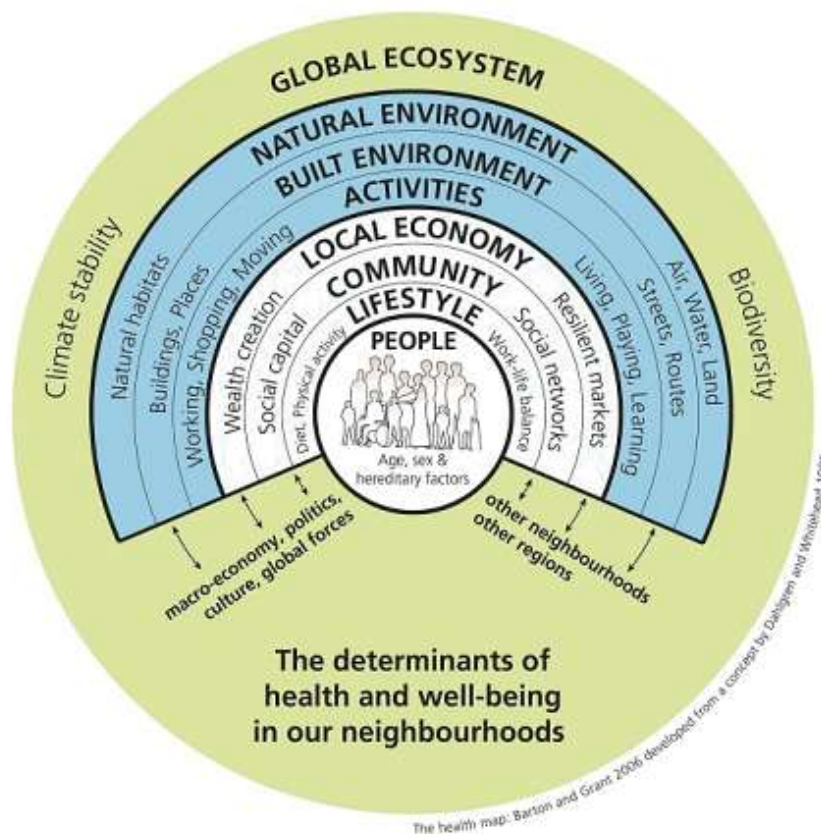


Figure 13.1 The determinants of health and well-being in our neighbourhoods

- Working with the community;
- Integrating health and social care;
- Prevention and early intervention;
- Reducing inequalities and tackling the wider determinants of health;
- Accountability and scrutiny; and
- Parity of esteem between mental and physical health, and an increased focus on mental well-being<sup>(29)</sup>

**13.7** The Joint Strategic Needs Assessment (JSNA) is a statutory document that local authorities have to produce, and it provides the evidence base for the Council's approach to the wider determinants of health and well-being.

**13.8** Being able to live active lifestyles significantly decreases the risk of coronary heart disease and obesity, hypertension, cancer, osteoporosis, depression and anxiety. Planning and development assist by promoting active transport such as walking and cycling and access to green infrastructure. These measures can help improve the health and well-being of local communities, as well as providing economic benefits by providing access to a range of open green and blue spaces and improving the quality and accessibility of public realm. Further

guidance will be provided on the creation of a connected network of green and blue infrastructure across the borough in the Green and Blue Spaces Supplementary Planning Document (SPD).



Figure 13.2 Health and well-being in Waltham Forest

## Policy 48

### Promoting Healthy Communities

Proposals will be supported where they promote the creation of healthy and sustainable places and communities by:

- A. Encouraging the delivery of high-quality environments that enable healthier, active and sustainable lifestyles (see Policy 53 'Delivering High Quality Design' and 'Active Travel, Transport and Digital Infrastructure');
- B. Encouraging the mitigation of environmental impacts on the health and well-being of occupiers;
- C. Undertaking Health Impact Assessments where required (see Policy 49 'Health Impact Assessments');

- D. Supporting the delivery of social and community infrastructure as per the requirements of Policy 46 'Social and Community Infrastructure'. Developer contributions threshold for this infrastructure will be set out in the Developer Contributions Supplementary Planning Document (SPD);
- E. Encouraging social interaction through the delivery of safe, accessible and inclusive places (see Policy 53 'Delivering High Quality Design');
- F. Encouraging child-friendly design of places;
- G. Encouraging new major commercial developments in Walthamstow Town Centre, designated District Centres and other highly accessible locations to incorporate social infrastructure such as free drinking fountains and free publicly accessible toilets as part of the development;
- H. Supporting the enhancement of and inclusive access to public green and open spaces, sports and recreation facilities (see Policy 78 'Parks, Open Spaces and Recreation');
- I. Encouraging food growing within the borough, and protecting existing allotments to support the provision of food growing spaces (see Policy 84 'Food Growing and Allotments'); and
- J. Enhancing the value of waterways for leisure and recreation to promote health and well-being for communities (see Policy 83 'Protecting and Enhancing Waterways and River Corridors').

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

**13.10** Mitigation of environmental impacts such as noise and air pollution are important to ensuring people can live healthy lives. Policy 88 'Air Pollution' sets out the Council's expectations to ensure better air quality and complements Policy 50 'Noise, Vibration and Light Pollution', which sets out the approach to ensuring noise does not adversely impact residents' well-being.

**13.11** Health Impact Assessments are an important tool to ensure that the health and well-being impacts of new developments are considered. Where appropriate, they can provide a comprehensive tool for ensuring development mitigates any potential adverse impacts and makes the most of its positive and beneficial aspects. Policy 49 'Health Impact Assessments' sets out when such assessments should be undertaken.



**13.12** Ensuring people have access to social and community infrastructure is important to enable people to participate in social activities to encourage interaction and prevent isolation. Social infrastructure includes access to education and health facilities. Policy 46 'Social and Community Infrastructure' and Policy 47 'Education and Childcare Facilities' set out the Council's approach.

**13.13** To ensure residents and visitors have access to necessary social infrastructure,



large scale developments that incorporate social infrastructure such as free drinking fountains, free public toilets, seating and shade as part of the development will be supported within the borough's designated Major and District Centres (see Policy 38 'Hierarchy of Centres'). Access to these forms of social infrastructure is a necessity for urban environments and should be freely available to meet the needs of all residents of, and visitors to, the borough.

**13.14** Improvements and enhancements to the borough's public green and open spaces will ensure all residents and visitors have safe access to well-maintained spaces and facilities. Further guidance will be provided on the creation of a connected network of green and blue infrastructure across the borough in the Green and Blue Spaces Supplementary Planning Document (SPD).

**13.15** Food growing can benefit the physical and mental well-being of residents through the provision of fresh and healthy food, as well as exposure and access to the natural environment and wildlife. Policy 84 'Food Growing and Allotments' sets out how this will be secured.

## Policy 49

### Health Impact Assessments

All development meeting the thresholds set out below will be expected to submit a Health Impact Assessment (HIA):

- A. Major development within an Air Quality Management Area;
- B. Developments which contain any of the following uses:
  - i. Hot food takeaways;
  - ii. Betting shops;
  - iii. Casinos and amusement arcades; and/or
  - iv. Pay-day loan shops;
- C. Developments of a scale referable to the Greater London Authority (as set out in legislation).

**13.16** Health Impact Assessments can be used to not only assess the health and well-being impacts of development, but also embed health and well-being into new developments. The London Plan defines Health Impact Assessments as "a systematic framework to identify the potential impacts of a development proposal, policy or plan on the health and well-being of the population and highlight any health inequalities that may arise". There are many different tools that can be used to undertake a Health Impact Assessment, including the Healthy Urban Development Unit (HUDU) Health Impact Assessment tool<sup>(30)</sup> or the Ben Cave Associates tool<sup>(31)</sup> and the Public Health HIA Guidance. Any Health Impact Assessment method will be acceptable, as long as it sets out clearly the health and well-being impacts of the proposal, how they have or will be mitigated (where necessary) and what the benefits of the proposals will be.

**13.17** All development meeting the thresholds set out in Policy 49 'Health Impact Assessments' will first require a 'Rapid Health Impact Assessment'. This involves a brief assessment of health impacts, including a literature review of quantitative and qualitative local evidence. Following consideration of the Rapid Health Impact Assessment, the Council may require additional information from the applicant or request the submission of a comprehensive Health Impact Assessment where adverse outcomes could be expected regarding the significance or likelihood of the impact occurring. Developments of a scale referable to the Greater London Authority (as set out in legislation) will be normally be required to complete and submit a detailed (comprehensive) Health Impact Assessment. Applicants for planning permission are advised to contact the Council's Public Health Team to agree the scope for comprehensive Health Impact Assessments.

**13.18** In implementing this policy, the Council will use the planning application validation process to check for compliance with Health Impact Assessment requirements. Where an Environmental Impact Assessment (EIA) is required, the Council will expect this to also address Health Impact Assessment requirements. To guide implementation, the Council intends to establish a steering group involving the Planning Policy & Public Health Teams and prepare a toolkit on Health Impact Assessments for additional guidance.

## Policy 50

### Noise, Vibration and Light Pollution

Noise, vibration and light pollution will be assessed and minimised by:

- A. Requiring applicants to demonstrate the impact of their proposed development on the noise environment and, where appropriate, provide a Noise Assessment. The layout, orientation, design and use of buildings should ensure that operational noise does not adversely affect neighbours, particularly noise-sensitive land uses such as housing, hospitals, schools and quiet open spaces;
- B. Requiring proposals and supporting Noise Assessments to have regard to the Agent of Change principle, as set out in London Plan Policies D13 'Agent of Change' and

30 [London HUDU Health Impact Assessment Tool](#)

31 [Ben Cave Associates : Review Package for Health Impact Assessment Reports of Development Projects](#)

D14 'Noise', and to minimise any potential noise conflict between existing activities and new development. Where the avoidance of noise conflicts is impractical or unavoidable, mitigation measures such as noise attenuation and restrictions on operating hours should be implemented, and will be secured through appropriate planning conditions;

- C. Requiring noise and vibration from deconstruction and construction activities to be minimised and, where necessary, mitigation measures put in place to limit noise and vibration disturbance in the vicinity of the development;
- D. Requiring developers to ensure that noise is reduced to an acceptable level, in line with the appropriate British Standard, during construction and operation, through the use of attenuation, distance, screening, or layout/orientation in accordance with London Plan Policy D14 'Noise';
- E. Ensuring that appropriate design measures are taken with external lighting schemes so they are contained and only illuminate intended areas; and
- F. Resisting developments where floodlighting or external lighting would cause unacceptable levels of light pollution, by applying the standards and guidelines set out in the Institute of Lighting Engineers Guidance Notes for the Reduction of Obtrusive Light.

**13.19** The impact of noise and vibration is a material consideration in determining planning applications. Applicants will be expected to have regard for the Government's Noise Policy Statement for England, London Plan Policy Policies D13 'Agent of Change' and D14 'Noise' and the Mayor's Environmental Strategy<sup>(32)</sup> on ambient noise.

**13.20** Appropriate lighting can play a vital role in ensuring community safety in the evening and at night, by enhancing environmental quality and opportunities for natural surveillance. It can also be beneficial in terms of highlighting and enhancing landmark structures, helping people navigate around the borough. However, such benefits need to be balanced against the detrimental effects excessive lighting can have on wildlife and concerns about energy consumption. As such national planning policy seeks to minimise light pollution from new development. In certain circumstances, particularly ecologically sensitive areas such as Special Areas of Conservation (SAC), Sites of Special Scientific Interest (SSSI) and Special Protection Areas (SPA), it may be necessary for developers to employ a suitably qualified and accredited lighting engineer.

## Policy 51

### Hot Food Takeaways

In accordance with London Plan Policy E9 'Retail, markets and hot food takeaways', Parts (D) and (E), proposals for new hot food takeaways will only be permitted where:

- A. The hot food takeaway is located within a designated centre or parade;
- B. The new hot food takeaway would not result in more than two hot food takeaway units being located immediately opposite or adjacent to each other, by maintaining a separation between them of at least two non-hot food takeaway units;
- C. The hot food takeaway is not located within 400 metres walking distance of the boundary of a nursery, a primary school, a secondary school, a community college or youth facilities; and
- D. A commitment is made to operate the hot food takeaway in compliance with the [Waltham Forest Healthier Catering Commitment](#) within six months of opening.

**13.21** There is a significant number of hot food takeaways across the borough. An over-concentration of hot food takeaways and poor availability of healthier food options reduces the opportunities for residents and visitors to make healthy food choices.

**13.22** Over-concentration of hot food takeaways within the borough's designated centres and retail parades can also have a detrimental impact on their character, vitality and function. In an effort to reduce further proliferation of these uses and encourage healthier lifestyles, Policy 51 'Hot Food Takeaways' introduces restrictions to prevent new hot food takeaways creating clusters of such uses in highly accessible areas.

**13.23** Addressing childhood obesity is an important priority for the borough. Public Health England Data shows that the prevalence of obesity amongst Year 6 school students in the borough exceeds the England average.<sup>(33)</sup> Restricting hot food takeaways within 400 metres walking distance of nurseries, primary schools, secondary schools, community colleges and youth facilities is a positive measure to manage the health implications related to rising levels of childhood obesity and help promote healthier communities.



**13.24** The borough's Healthier Catering Commitment is a voluntary scheme that seeks to help food businesses, outlets and caterers make healthy improvements to their food options. This includes various small actions around reducing the consumption of fat, salt and sugar and increasing access to fruit and vegetables.

## Policy 52

### Betting Shops and Payday Loan Shops

Proposals for new betting shops and payday loan shops will be carefully controlled in the borough. New proposals will be assessed with regard to the following factors:

- A. The location of the proposed development, its catchment area and proximity to areas of deprivation;
- B. The presence of other similar operators and extent of clustering of such uses in the local area;
- C. The health impacts of the proposed use or activity; and
- D. The implications for community safety, crime and anti-social behaviour (see Policy 58 'Making Places Safer and Designing Out Crime').

**13.25** This policy considers the health and well-being implications raised by betting and pay day loan shops. Both have been part of the Waltham Forest economy for a number of years, but in recent years, both have given rise to significant public concern - particularly in some areas of the borough. Research has shown that gambling can adversely affect determinants of health, and influence criminal activity - for example to pay off debt. Therefore, whilst such uses may be appropriate in designated centres where they can contribute to retail diversity, it is necessary to control their location in other more localised areas.

**13.26** The impact of clusters of betting shops and payday loan shops is recognised by national publications, other research studies and the London Plan. Such uses have been associated with wide ranging public health consequences that disproportionately affect vulnerable groups in ways that contribute to and exacerbate existing social inequalities.

**13.27** Research evidence undertaken by the Royal Society of Public Health<sup>(34)</sup> assessed a range of businesses for their impacts on health. It found that an increase in presence of payday loan shops on high streets is problematic when an increasing number of individuals and families are finding themselves in financial difficulty. It also found that there was a link between severe debt and poor mental health and that half of those with debt also have a



mental health problem. Severe debt has also implications for increased domestic violence, food poverty, fuel poverty, increased suicide risks and strains on family relationships. Furthermore, people most likely to use payday loans are those who struggle on low incomes, low levels of savings and a lack of financial education. A report from the Office of Fair Trading identified that 60% of people taking out payday loans as 'vulnerable', with the most vulnerable groups including unemployed, single parents and older people. Other evidence from the Royal Society of Public Health<sup>(35)</sup> also note that the impact of debt on lives is not just financial and that payday lenders have the most negative impact on mental well-being.

**13.28** The Index of Multiple Deprivation (IMD) is the official measure of relative deprivation in England and is part of a suite of outputs that form the Indices of Deprivation (IoD). In the 2019 IMD Waltham Forest was ranked the 82nd most deprived borough nationally (out of 317 districts) and the 12th most deprived London borough (out of 32). In applying this policy, reference will be made to areas of deprivation as identified.<sup>(36)</sup>

## Implementation

**13.29** The main tool the Council has in delivering the policies in this section of the Plan is through the planning application process. This will be complemented by a range of implementation actions and initiatives including the following:

- Working with partners such as the Public Health team, the GLA, Healthy Urban Development Unit (HUDU) and NHS North East London to provide advice on the health impacts of new development;
- Working with partners such as the Lee Valley Regional Park Authority, the London Legacy Development Corporation and the City of London Corporation (Conservators of Epping Forest) to improve access to recreational areas such as Epping Forest, Lee Valley Regional Park and the Queen Elizabeth Olympic Park;
- Working with the Council's Area Regeneration, Transport Planning and Highways teams, as well as partners such as TfL, to improve existing cycle and pedestrian routes to ensure they are safe and attractive in order to deliver the maximum health benefits from active travel;
- The on going review, drafting and consultation on Area Frameworks;
- The annual review of the Infrastructure Delivery Plan (IDP);
- The preparation of a Green and Blue Spaces Supplementary Planning Document (SPD) and a new Developer Contributions Supplementary Planning Document (SPD); and
- The full action plan (once published) to implement the recommendations of the Marmot 'Fairer and Healthier Waltham Forest' (2022) report.<sup>(37)</sup>

35 RSPH Life on Debt Row, March 2018

36 Lower Layer Super Output Area (LSOA) indices of deprivation measure relative deprivation in small areas in England. See <http://dclgapps.communities.gov.uk/imd/idmap.html>

37 <https://www.instituteofthehealthequity.org/resources-reports/a-fairer-and-healthier-waltham-forest>

## Creating High Quality Places

### Strategic Objective

Promote exemplary standards of design in placemaking and the highest quality of development, whilst ensuring locally distinctive character and heritage is celebrated, protected and enhanced.

**14.1** All new development in the borough should be of the highest quality and prioritise good design. Well designed places function well, are pleasing to the eye and endure through time. As such, they enhance residents' quality of life. Delivering high quality places is essential for sustainable development and is critical to achieving the necessary growth across the Plan Period. In accordance with the NPPF, development that is not well designed will be refused, especially where it fails to reflect local design policies and guidance, and other regional and national guidance on design.

**14.2** Proposals for new development will be expected to demonstrate an understanding of their context and respond to local distinctiveness with innovation and design excellence. They will be expected to enhance the overall quality of their settings and deliver well designed, high quality places that are inclusive, well connected and attractive for local people and visitors. Development should take the opportunity to incorporate high quality landscaping and green spaces where appropriate, including tree planting and new tree-lined streets.

### Policy 53

#### Delivering High Quality Design

Development proposals will be supported where they:

- A. Achieve appropriate intensification in line with Policy 8 'Character-Led Intensification';
- B. Explore the benefits of land assembly and/or coordinated development where appropriate;
- C. Deliver the benefits of cohesive, high quality design through the use of masterplans or similar approaches;
- D. Demonstrate clearly how the proposal responds to the design principles and framework(s) set out in the relevant national, area neighbourhood, or site-specific design guides and/or design codes;
- E. Reinforce and/or enhance local character and distinctiveness, taking into account existing patterns of development, townscape, skyline, urban form and grain, building typologies, architecture, materials, trees and landscaping and other features of local and historical significance;
- F. Respond appropriately to their context in terms of scale, height, and massing;
- G. Achieve exemplar quality of design, and architecture and landscaping that respects its context whilst encouraging innovation and not unduly restricting style;
- H. Use high quality materials and detailing which are attractive, durable and sustainable;

- I. Provide appropriate safe and legible physical and visual connections that knit well into surrounding streets, routes and public realm, including, where appropriate, neighbouring development proposals;
- J. Incorporate high quality landscaping, tree planting and urban greening measures to maximise biodiversity and ecological value in accordance with Policy 77 'Green Infrastructure and the Natural Environment', Policy 78 ' Parks, Open Spaces and Recreation ', Policy 79 'Biodiversity and Geodiversity' and Policy 80 'Trees';
- K. Provide a coherent layout and block structure with active street frontages onto the public realm;
- L. Establish a clear distinction between public and private spaces;
- M. Provide an appropriate amount of well designed, suitably located and usable private and communal amenity space;
- N. Provide tree-lined streets and multi-functional green spaces at ground, podium, and roof level (as appropriate), through a well integrated soft landscaping scheme that has been fully considered from the initial stages of design and makes satisfactory provision for future growth and aftercare;
- O. Facilitate inclusive, safe and accessible environments for all;
- P. Incorporate design measures that increase climate change resilience, including in relation to energy use, surface water management, microclimate control, waste management, air and noise pollution;
- Q. Maximise the versatility, adaptability and sustainability of both buildings and open spaces in order to accommodate present and future requirements;
- R. Are fit for purpose and demonstrate careful consideration of the needs of all building users;
- S. For residential schemes of ten homes and above, address the Homes England Building for a Healthy Life (BHL) criteria, and for all major applications, address the ten principles of Active Design, as published by Sport England and supported by Public Health England; and
- T. Maintain approved design quality from the granting of planning permission through to completion of the scheme.

**14.3** It is a key priority of the Council to ensure that all new development delivers exemplar architectural and design quality. This Exemplar Design approach builds on the London Plan position in relation to high quality, sustainable and inclusive design, to ensure development also considers community safety, local character and health, encourages neighbourliness and achieves resource efficient buildings that create environmental value for the borough. Exemplar Design also requires development to respond positively to the existing character and context of the local area. Further detail on how all development should achieve Exemplar Design standards in Waltham Forest will be set out in a suite of Supplementary Planning Documents (SPDs) including an Exemplar Design SPD, an Industrial Intensification SPD, a Green and Blue Spaces SPD, a Retrofit and Residential Extensions SPD and an updated Developer Contributions SPD.

**14.4** Part D of Policy 53 'Delivering High Quality Design' requires applicants to set out how their proposals achieve the principles and respond to the framework(s) set out in any relevant design guide/code for the area. This will be understood to be a Council-led framework, masterplan, design guide, design code or development brief that covers the area of the application site, whether adopted as a Supplementary Planning Document (SPD) or not. This requirement can also relate to an applicant-led framework, masterplan, design guide or design code, but only where this has been developed with the input of, and agreed in writing by, the Council in advance of determination of the planning application. In the absence of local design guidance, the Local Planning Authority and applicants will be expected to defer to guidance in the National Design Guide and the National Model Design Code. Development that is not well design will be refused planning permission especially where it fails to reflect local design policies and guidance, and other national, London or local guidance on design.

**14.5** Waltham Forest has a well established, independent, expert design review process. This supports the delivery of Exemplar Design by providing tailored design advice for individual development proposals, with the aim of improving and enhancing them for the benefit of the borough and local people. Applicants will be expected to use this service at an appropriate stage in the planning process to ensure robust design scrutiny that embeds the borough's aspirations for high quality development.

**14.6** It is important that approved Exemplar Design quality is retained from the granting of planning permission through to completion of built schemes. This will be achieved by ensuring that sufficient design information is submitted in support of planning applications and using clearly worded planning conditions to secure quality once permission is granted. Where appropriate, the continued use of the Design Review Panel may be necessary to review amendments to an approved scheme



or details submitted to discharge planning conditions. The use of legal agreements to retain the planning architect, or require a design champion or design certifier will also be considered where appropriate.

**14.7** Building for a Healthy Life (BHL)<sup>(38)</sup> is a government-endorsed industry standard for well designed homes and neighbourhoods. It consists of a series of questions designed to help structure discussions between local communities, local planning authorities, developers and other stakeholders, and to help local planning authorities assess the quality of proposed and completed developments. Residential development proposals of 10 homes and above will be expected to show evidence of how their development performs against the Building

for a Healthy Life (BHL) criteria. There is no obligation on applicants to use an external or independent consultant to complete an assessment, but they are free to do so if they so wish.

**14.8** Exemplar design and high quality placemaking create environments that make active choices easy and attractive. Active Design<sup>(39)</sup>, published by Sport England with support from Public Health England, is a guidance document intended to help unify health, design and planning by promoting the right conditions and environments for individuals and communities to lead active and healthy lifestyles.

## Policy 54

### Tall Buildings

In some identified locations, tall buildings may be supported subject to meeting the requirements of this policy and the other requirements of this Plan.

For the purposes of these policy tests, the definition of a tall building in the borough is any building of 10 storeys or more, or any building that measures 30m or more from ground level.

- A. Tall buildings will only be supported on certain sites identified for a Transition or Transformation approach to character intensification, in line with Policy 8 'Character-Led Intensification'. These sites have been identified in Figure 14.1. The acceptability of tall buildings on these sites remains subject to thorough contextual analysis, a robust placemaking strategy, and assessment against all relevant policy tests in the Development Plan.
- B. In general, the appropriate range of heights for new tall buildings is between 10 and 17 storeys in height. On some Transformation sites however, there may be the opportunity to exceed this and, subject to contextual analysis, a robust placemaking strategy, and assessment against all relevant policy tests, buildings of 18 storeys or more may be acceptable. Indicative ranges of potentially acceptable heights for these sites will be provided in Local Plan Part 2 - Site Allocations.
- C. In other limited circumstances, a tall building may be supported on a site outside those sites identified in Figure 14.1, but only where a Tall Buildings Assessment (which has been undertaken and endorsed by the Council prior to the determination of a relevant planning application) demonstrates that:
  - i. The site is located within a Strategic Location;
  - ii. The site benefits from good local public transport connectivity;
  - iii. The site is appropriate for a Transition or Transformation approach to character-led intensification;
  - iv. All relevant policy tests have been undertaken and assessed against appropriate contextual analysis and a robust placemaking strategy; and
  - v. A tall building(s) on the site would be able to fully satisfy all policy requirements and deliver Exemplar Design, having regard to the considerations below (including

Visual Impacts, Environmental Impacts, Functional Impacts and Cumulative Impacts);

Such sites will be identified in Local Plan Part 2 - Site Allocations and/or other subsequent Development Plan Documents.

- D. Where justified in accordance with criteria A to C, tall buildings will be supported where they achieve Exemplar Design, having regard to the following considerations, in addition to those set out in Policy 53 'Delivering High Quality Design' and Policy 55 'Building Heights'.

### Visual Impacts

- i. Impact on the existing character and townscape of their surroundings considered in long-range, mid-range and immediate views;
- ii. Impact on the existing streetscape, including the provision of active frontages and sufficient, high quality public realm at ground level;
- iii. Impact on the existing, and where relevant emerging, skyline;
- iv. Contribution to existing and proposed spatial networks and hierarchies, wayfinding, and legibility;
- v. Impact on heritage assets, their settings, and views to and from them including the background zones of views identified in the London View Management Framework (LVMF)<sup>(40)</sup>; and
- vi. Exemplar quality of architecture and design with careful attention paid to form and proportionality, materials, finishes, and details;

### Environmental Impacts

- vii. Avoidance of harmful overshadowing or other impacts that would compromise the comfort and enjoyment of surrounding public open space, private or communal outdoor spaces, private amenity of neighbouring properties, watercourses and canals;
- viii. Avoidance of harmful environmental impacts in relation to overcrowding, overheating, wind movement, solar glare, microclimatic conditions, air, noise and light pollution and bird and bat strikes;
- ix. Use of sustainable design, materials and construction methods;

### Functional Impacts

- x. Demonstration of the safety of all occupants, including considerations such as internal and external design, construction detailing, materiality, and emergency exit routes;
- xi. The impacts of servicing, maintenance, and building management on safety, quality, and enjoyment of the surrounding public realm;
- xii. Connection to public transport, walking and cycling networks and access to nearby facilities such as shops, community facilities and social infrastructure;
- xiii. The avoidance of interference to aviation, navigation and/or telecommunications; and

### Cumulative Impacts

- xiv. The cumulative visual, functional, and environmental impacts of proposed, consented and planned tall buildings in the surrounding area.

**14.9** In the right places, and with exemplary architectural quality and design, tall buildings can make a positive contribution to the character and skyline of the borough. They can help to optimise the use of land and assist in accommodating the borough's anticipated growth over the coming years, providing new homes and economic opportunities. They can also help people navigate through the borough by providing reference points on the skyline and drawing attention to key destinations, and they can become beacons for regeneration, stimulating further investment.

**14.10** It is important to note however, that tall buildings are not always necessary to achieve intensification and good growth. For sites or areas that are sensitive to height, lower approaches to intensification are likely to be more suitable. It is also recognised that tall buildings can present a number of challenges which must be addressed and managed sensitively in the context of their immediate and wider surroundings.

**14.11** The London Plan says that local authorities should define what is considered to be a tall building, as this may vary in different parts of the capital and should take into account local character and context. This is an important consideration in Waltham Forest, where there are significant variations in character, townscape and sensitivity to growth and intensification.

**14.12** As set out in Policy 54 'Tall Buildings', new tall buildings in Waltham Forest are defined as being between 10 storeys (or above 30m when measured from the ground) and 17 storeys and will only be supported on certain sites identified for a Transition or Transformation approach to character-led intensification, as identified on Figure 14.1. On some Transformation sites which are likely to see extensive change, there may be opportunities for buildings of 18 storeys or more in height. Where the Council considers a Transformation site to be potentially suitable for tall buildings of 18 storeys or more, a range of heights will be indicated in Local Plan Part 2 - Site Allocations.

**14.13** Inclusion as a site with potential for tall buildings in Figure 14.1 or in Local Plan Part 2 - Site Allocations does not mean that buildings of the heights identified are automatically acceptable. Any proposals for tall buildings on these sites will be subject to full consideration against all relevant planning policy, including that set out in Policy 8 'Character-Led Intensification', Policy 53 'Delivering High Quality Design' Policy 54 'Tall Buildings' and Policy 55 'Building Heights' to ensure that they are appropriate for their location and do not lead to unacceptable impacts on the local area.

**14.14** Part C of Policy 54 'Tall Buildings' does not provide an alternative to compliance with Parts A or B, but rather acknowledges that, over the Plan Period, evidence may be developed to support the delivery of a tall building on a site that is not currently identified on


Figure 14.1. This is only anticipated in very limited circumstances and will only be supported where a Council-led Tall Buildings Assessment supports a tall building on the site. Examples of such limited circumstances could include opportunities to signify a new use or public space of civic importance, framing or defining key views or to enhance an existing cluster of tall buildings. As set out in the policy, this will only apply in Strategic Locations, on sites with good public transport connectivity, that are suitable for a Transition or Transformation approach to character-led intensification, and where all other policy tests can be met. Such sites will be identified in Local Plan Part 2 - Site Allocations and/or other subsequent Development Plan Documents.

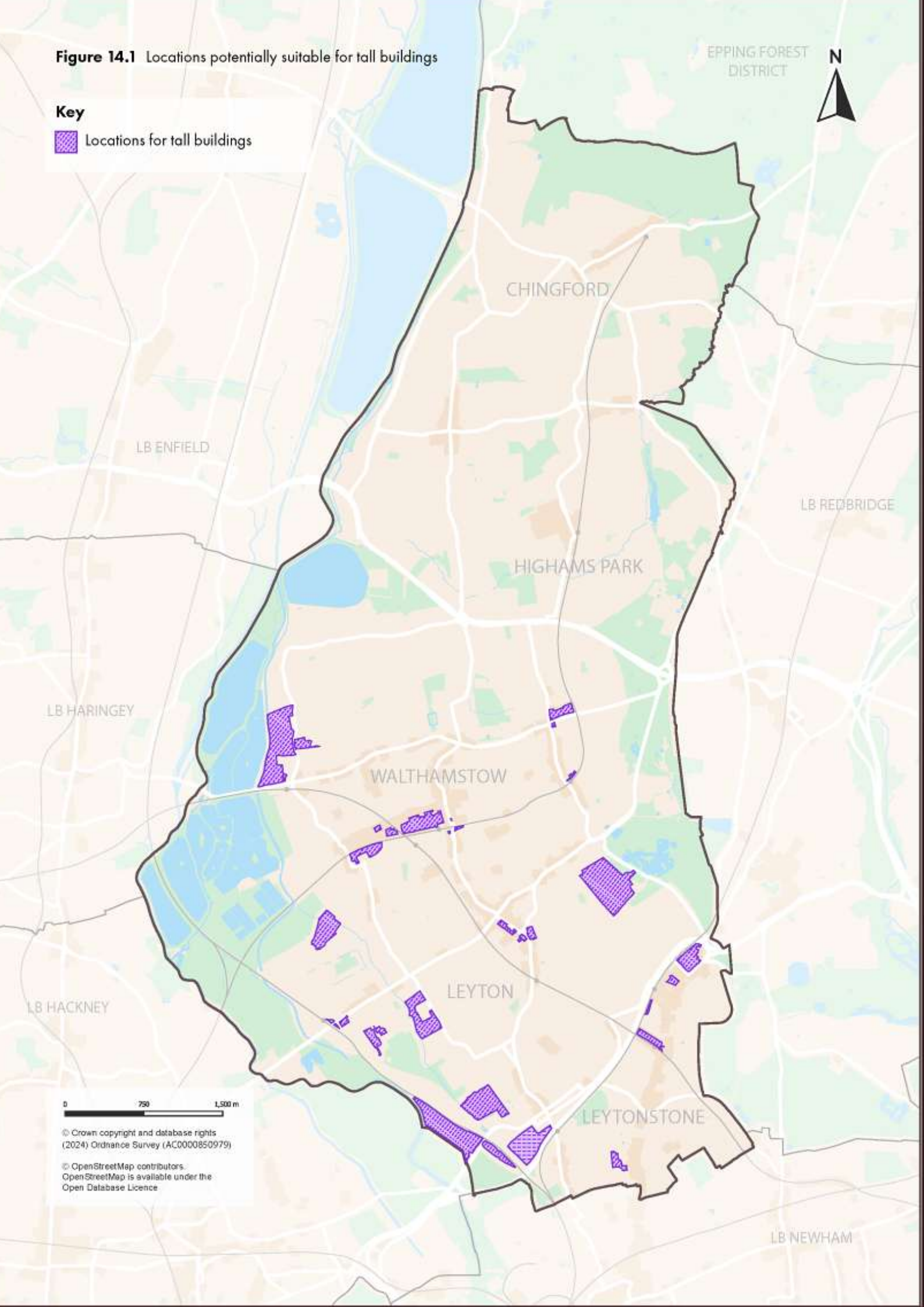
**14.15** All tall buildings will also need to demonstrate exemplar architectural and design quality to be considered acceptable. Further detailed guidance on the Council's expectations regarding the design and architecture of proposals for tall buildings will be set out in the Exemplar Design Supplementary Planning Document (SPD).



**Figure 14.1** Locations potentially suitable for tall buildings

**Key**

 Locations for tall buildings



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**Policy 55**

**Building Heights**

Appropriate building heights for new development will vary in response to the prevailing character and building heights of that part of the borough, in line with the approach to character-led intensification set out in Policy 8 'Character-Led Intensification'.

A. Building heights for new development will generally be acceptable where they fall within the ranges set out in Table 14.1 below. This remains subject to thorough assessments of context and character and all of the Exemplar Design criteria set out in Policy 53 'Delivering High Quality Design'.

Agreed response to surrounding character	Indicative range of typical building shoulder heights	Indicative range of heights for buildings that exceed typical shoulder heights, where supported by a positively prepared Height and Massing Strategy	Approach to Tall Buildings
Transformation	4-9 storeys	Refer to Policy 54 'Tall Buildings'	
Transition	3-5 storeys	6-9 storeys	Refer to Policy 54 'Tall Buildings'
Reinforcement	2-5 storeys	Not appropriate, other than in exceptional circumstances where the site context and proposed land uses would be enhanced by taller buildings. In such circumstances, 6-9 storeys may be considered appropriate.	Not appropriate

**Table 14.1 Building heights for new development**

B. Where development proposals are required by Part A to be supported by a Height and Massing strategy, any such strategy should demonstrate that proposals contribute to their context and result in a successful composition of buildings and open spaces.

They should always come forward as positive design intentions rather than solely to increase density.

- C. All development proposals should address issues of height and scale with regard to the impact on the local and historic context, as set out in Historic England Advice Note 4<sup>(41)</sup> (or equivalent) and other relevant guidance.

**14.16** The character and built context of Waltham Forest, including predominant building heights, varies across the borough. In line with the Characterisation and Intensification Study (2019)<sup>(42)</sup>, Policy 8 'Character-Led Intensification' of this Plan sets out an approach to intensification based on the categories of Reinforcement, Transition and Transformation identified for different parts of the Borough. Table XX in Policy 55 'Building Heights' sets out recommended ranges of heights for each of these categories, based on the evidence provided in that study. The recommended ranges of shoulder heights reflect the generally low-rise nature of some of the borough's built environment. Above that, the ranges reflect the distinction in architecture found between existing examples in the borough.

**14.17** Sites identified in Local Plan Part 2 - Site Allocations will provide guidance as to whether they are appropriate for Reinforcement, Transition or Transformation. Where not specified in Local Plan Part 2 - Site Allocations, development proposals will be expected to determine which approach to character-led intensification is most appropriate given the character and context of the site under consideration. This will be subject to agreement with the Local Planning Authority, likely at pre-application stage, and will require clear and compelling justification.

**14.18** Height and Massing Strategies are an important tool used to justify the distribution of scale across a development proposal. As set out in Policy 55 'Building Heights', they should be led by positive design intentions such as marking a location of civic, cultural, or landmark importance, or providing appropriate enclosure to well-designed open spaces and public realm. Further guidance on the location, quality and composition of all buildings will be provided in the Exemplar Design Supplementary Planning Document (SPD), area specific SPDs, design codes, masterplans and planning/development briefs and Area Frameworks.

## Policy 56

### Residential Space Standards

- A. Proposals for new homes are required to meet the prescribed minimum internal space standards, as set out in Table 14.2;
- B. All housing design should maximise the provision of dual aspect dwellings and avoid the provision of single aspect dwellings wherever possible. Single aspect dwellings that are north facing, contain three or more bedrooms, or are exposed to noise levels with significant adverse effects on health and quality of life will not be supported. Where single aspect homes are proposed, it should be demonstrated that they will have adequate passive ventilation, daylight and privacy, and avoid overheating;

41 [Historic England Advice Note 4](#)

42 [Character and Intensification Study \(2019\)](#)

- C. Proposals for new homes are required to meet the following external amenity space standards:
- i. Houses should provide a minimum of 50sqm of private external amenity space per dwelling;
  - ii. One and two bed flats and maisonettes should provide a minimum of 10sqm of external amenity space per dwelling. Flats and maisonettes containing three bedrooms or more should provide a minimum of 10sqm of external amenity space per dwelling plus an additional 1sqm for each additional occupant. These external amenity space requirements should include some private outdoor amenity space for each dwelling in the form of balconies, terraces and/or private gardens (including roof gardens). The remaining external amenity space requirements can include communal, landscaped amenity space in accordance with guidelines set out in the London Plan;
  - iii. Private external amenity spaces must be a minimum of 5sqm and achieve a minimum depth and width of 1.5m;
  - iv. Communal external amenity spaces must be a minimum of 50sqm and should be easily accessible to all residents of the development, regardless of tenure;
  - v. The measurement of external amenity space areas should exclude footpaths, driveways, and areas for vehicle circulation and parking;
  - vi. Where external amenity space standards cannot be provided on-site, the Council may require financial contributions towards enhancing or upgrading the provision of local open space(s) in the vicinity of the development;
- D. All external amenity space should be well designed, appropriately located and usable. External amenity space should not be steeply sloping, awkwardly shaped or very narrow. The role and function of each external amenity space should be clear and the boundaries between different spaces should be well defined. The most important design factors to consider with both private and communal external amenity spaces are:
- i. Ease of accessibility;
  - ii. Levels of sunlight penetration;
  - iii. Security;
  - iv. Shelter from wind and other environmental factors; and
  - v. Good levels of natural/passive surveillance;
- E. Children's play areas should be provided in all developments containing 10 or more child bed spaces. A minimum of 10sqm of playspace should be provided as per child (as per the London Plan and the Mayor's Providing for Children and Young People's Play and Informal Recreation Supplementary Planning Guidance (SPG)<sup>(43)</sup> or equivalent). Where children's play space requirements cannot be provided on-site,

the Council may require financial contributions towards enhancing or upgrading the provision of local play space(s) in the vicinity of the development; and

- F. Wherever possible, family homes in apartment blocks should be located with good access to communal external amenity space and should allow oversight of children playing outside.

		Minimum gross internal floor areas and storage (square metres)			
Number of bedrooms (b)	Number of bed spaces (persons, (p))	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage
1b	1p	39 (37)*			1
	2p	50	58		1.5
2b	3p	61	70		2
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3
	6p	99	106	112	

**Table 14.2 Minimum internal space standards for new dwellings**

**14.19** Dual aspect dwellings with opening windows on at least two sides have many inherent benefits. These include better daylight, a greater chance of direct sunlight for longer periods, natural cross ventilation, a greater capacity to address overheating, pollution mitigation, a choice of views, access to a quiet side of the building, greater flexibility in the use of rooms, and more potential for future adaptability by altering the use of rooms. Single aspect dwellings are more difficult to ventilate naturally and are more likely to overheat, and therefore should be avoided. This Plan therefore supports and encourages the design of dual aspect homes wherever possible. Single aspect homes should be avoided in general, but this is particularly important in larger family homes, in homes with north facing aspects and in sensitive locations.

**14.20** Where single aspect homes are agreed to be unavoidable, their design must demonstrate that all habitable rooms and all kitchens are provided with adequate passive ventilation, privacy and daylight, and that their orientation will enhance the amenity enjoyed by occupants, including views out. It must also be demonstrated that they will avoid overheating without reliance on energy intensive mechanical cooling systems.

**14.21** External amenity space is an integral part of successful housing design. It is important to ensure that all new residential development provides an appropriate amount of external amenity space to meet the needs of residents, that it is of a suitable qualitative standard and that it allows for a variety of amenity space functions. Access to high quality external amenity space and play areas can have a significant positive impacts on physical and mental health and well-being. Well landscaped outdoor amenity spaces, particularly gardens, can also help reduce the urban heat island effect. For flats and maisonettes, private external amenity spaces provided in the form of balconies, terraces or gardens are often of greater value in terms of privacy and usability than communal external areas. This Plan

therefore expects a component of private external amenity space, meeting or exceeding the minimum standard set out in Policy 56 'Residential Space Standards', to contribute to external amenity space requirements wherever possible.

### **Policy 57**

#### **Amenity**

New development should respect the amenity of existing and future occupiers, neighbours and the surrounding area by:

- A. Avoiding harmful impacts from overlooking, enclosure and/or the loss of privacy, outlook and daylight/sunlight;
- B. Avoiding harmful impacts from poor microclimate conditions, air pollution, odour, noise and vibration and/or light pollution; and
- C. Providing sufficient facilities for the storage, collection and disposal of refuse, considering the level and type of provision, its location, and any negative impacts it may have on visual amenity, access, health and security.

**14.22** In this context, the term 'amenity' describes the features of an area, place, open space, building or habitable room that contribute to its attractiveness and comfort.

**14.23** Protecting the amenity of both existing neighbours and future occupiers is critical to delivering sustainable, inclusive growth across the borough. Any impacts on amenity likely to result from development proposals will be carefully assessed in relation to their associated environmental, health and social impacts, both for the immediate surroundings and the wider environment. Specific attention will be paid to potentially harmful impacts such as perceived sense of enclosure, loss of daylight and sunlight, loss of privacy, loss of outlook, overcrowding, isolation, exposure to odours, noise and vibration, poor air quality and poorly controlled waste storage and removal. Further guidance will be set out in the Exemplar Design Supplementary Planning Document (SPD). The degree of harm to amenity will always be considered on a case by case basis.

### **Policy 58**

#### **Making Places Safer and Designing Out Crime**

To improve community safety and cohesion the Council will work with partners to:

- A. Minimise opportunities for criminal behaviour by requiring all forms of new development to incorporate Designing out Crime and Secured by Design principles, and requiring all major development to seek to achieve for Secured By Design accreditation via the Secured by Design scheme;

- B. Coordinate land uses to minimise the likelihood of an increase in crime and disorder; and
- C. Promote safer streets and public realm improvements throughout the borough, where necessary in liaison with the Metropolitan Police Designing Out Crime Officers (DOCOs), Counter Terrorism Security Advisors (CTSAs), Traffic Management Unit (TMU) and with the British Transport Police (BTP).

**14.24** Ensuring that the borough is safe is a priority for Waltham Forest, and fundamental to the objective of this Plan to promote high quality places that are inclusive, well connected and attractive for all users. Exemplar Design has an important role to play in promoting community safety, reducing crime and disorder and reducing the perception of crime and disorder. The Council also recognises the important and complementary role that 'Designing Out Crime' can have in contributing to good placemaking.

**14.25** Anti-social behaviour does not just make life unpleasant; it prevents a peaceful community life, it degrades the environment and it can have a big impact on residents' mental health and well-being. The planning process can minimise opportunities for such behaviour through the careful design of new developments, without compromising the principles of good placemaking. By taking opportunities to maximise natural/passive surveillance, and making clear distinctions between public and private space, the opportunities for criminal or anti-social behaviour can be reduced. In order to achieve this, proposals will be expected to incorporate guidance on 'Designing Out Crime'.

## Policy 59

### Advertisements, Hoardings and Signage

Proposals for advertisements, hoardings and signage should:

- A. Be well integrated into the public realm, allowing for ease of pedestrian access and highway safety, and avoiding the creation of street clutter;
- B. Complement the character, context and visual amenity of the surrounding area and not result in harm to the significance of heritage assets and their settings;
- C. Avoid negatively impacting any host building and/or the surrounding local area through visual dominance and overbearing impact;
- D. Avoid creating a proliferation of advertisements;
- E. Avoid interference to existing views from adjacent properties; and
- F. Avoid flashing illumination both internally and externally, and minimise the impact of light pollution on adjacent properties.

**14.26** Advertisements, hoarding and signage are often essential to the successful functioning of the local economy and can provide necessary and important information or safety functions. They can however also affect the visual appearance of an area and reduce townscape quality



and public safety. Careful management of advertisements hoardings and signage is therefore necessary, taking into consideration quantity, size, design, siting and illumination in relation to the surrounding environment.

## Active Travel, Transport and Digital Infrastructure

### Strategic Objectives

Improve active and sustainable transport choices across the borough and beyond, building on the success of the Enjoy Waltham Forest programme and encouraging wider, fully integrated walking and cycling routes.

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 residents, partners, investors, developers and providers.

**15.1** Technological and behavioural changes in the last decade have brought exciting opportunities to re-evaluate how people and goods move - and their interaction with the urban environment. This chapter covers sustainable transport and digital infrastructure, both of which play a fundamental role in the development of Waltham Forest and the quality of its residents' lives and health. Both connect individuals and communities, facilitate access to job opportunities and for businesses to connect goods to markets, linking into the global marketplace. There are important choices to make when it comes to transport - for example, whether to walk, cycle, take public transport or a private car. It is recognised that choice in many situations could be limited by personal preferences, travel conditions, environmental concerns or other local circumstances. These choices also have important consequences for the future of the borough.

**15.2** In 2018, the Council's Digital and Technology Strategy set out the importance of connectivity to inclusive, sustainable growth in Waltham Forest. The services enabled by digital technology benefit residents in a number of ways, including access to jobs and learning opportunities and the delivery of council services such as libraries and social care. The internet has created entirely new fields of commerce which did not exist even in the recent past, and its impact extends to all sectors - enabling new capabilities, products and services. With the advent of 5G, quality, speed and extent of connectivity are important factors not just for local residential communities but also for businesses making economic decisions, including where companies decide to expand or locate new facilities. Waltham Forest has an ambitious Digital Inclusion Strategy to tackle the personal, structural, and financial barriers that prevent some of the borough's residents from thriving in an increasingly digital world.

### Sustainable Transport

**15.3** Waltham Forest's Transport Infrastructure Investment Strategy, Vision 2020 for Cycling, and Local Implementation Plan 3 (LIP3) (2019), set out the borough's vision for a transport network that would improve the quality of life of all residents and unlock significant opportunities for inclusive, sustainable growth.

**15.4** Waltham Forest is committed to meeting the Mayor of London's Transport Strategy<sup>(44)</sup> objectives to deliver a transport network that improves the health and wellbeing of all Londoners, and to achieve an 80% mode share for active and sustainable travel by 2041. To

<sup>44</sup> [Mayor's Transport Strategy](#)

achieve this target, a significant shift towards walking, cycling and public transport use is needed over the next 20 years. This is encapsulated in the Council's 15 Minute Neighbourhood Corporate Strategy,<sup>(45)</sup> which presents an effective way of creating healthier, active communities and people-friendly places.

**15.5** Building on the success of that vision, the Council's ongoing objective is to deliver an affordable, accessible, and future-proofed public transport network that allows residents and businesses to access opportunities, whilst creating attractive, healthy and safe 15 Minute Neighbourhoods where the benefits of active travel are shared by all. In order to achieve this, the Council will continue to work closely with the Essex County Council (ECC), Epping Forest District Council (EPDC), neighbouring London Boroughs, Transport for London (TfL) and other relevant public sector bodies.

**15.6** The 15 Minute Neighbourhood approach is all about living locally, giving people the ability to meet most of their daily needs within a 15 minute walk, wheel or cycle from home. Safe cycling and local public transport infrastructure is integral to this. Development will be expected to contribute to these aims by enhancing active and public local transport networks and minimising the need to travel through good design and locating the right development in the right places.

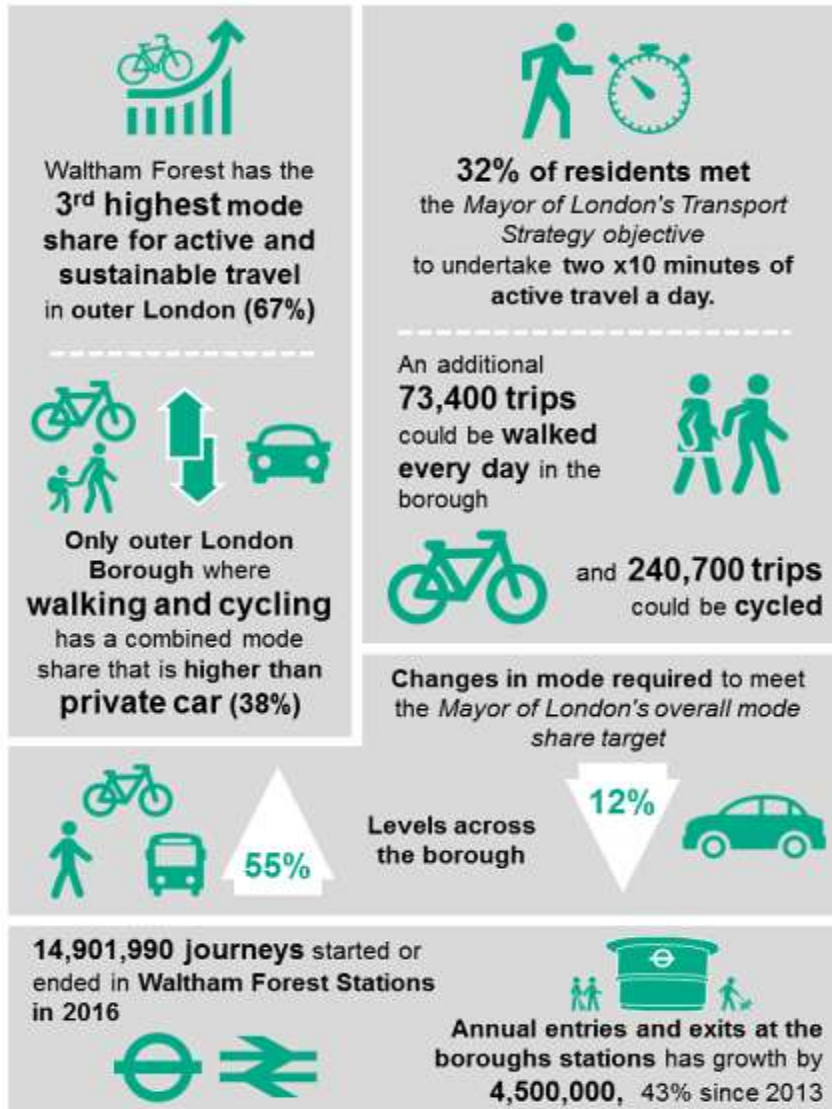


Figure 15.1 Active and sustainable travel in Waltham Forest

**Policy 60****Promoting Sustainable Transport**

New development will be expected to contribute to the Council's objective to deliver more attractive, accessible, healthy and safe streets, places and neighbourhoods for all residents in Waltham Forest. As such, development proposals will be supported where they:

- A. Create an environment where residents and visitors actively feel welcomed and choose to walk, cycle or use public transport as part of their everyday life;
- B. Contribute towards enhancing streets to meet Healthy Streets<sup>(46)</sup> indicators across the public realm in the borough;
- C. Increase the proportion of trips made by walking, cycling and public transport and improve local connections and facilities for these modes, in line with Policy 61 'Active Travel' and Policy 62 'Public Transport';
- D. Improve the quality and resilience of the public realm, ensuring accessible and adaptable public space for people and activities from all walks of life;
- E. Create safe neighbourhood environments, including reducing road danger, improving personal security and meeting the Mayor of London's Transport Strategy objective for Vision Zero;
- F. Provide legible, prominent and coherent wayfinding for walking and cycling to and through strategic and local active travel networks, public transport hubs, amenities, schools and green spaces;
- G. Support permeability for active modes of travel, and prioritise road space for cycling, walking and public transport;
- H. Ensure neighbourhoods have good connections to public transport, in line with Policy 62 'Public Transport';
- I. Deliver car-free development to reduce car dominance in terms of congestion and excessive parking on the street;
- J. Support sustainable transport initiatives that reduce demand for car ownership, such as: car club development; cycle hire facilities; local bus service improvements; electric vehicle charging infrastructure; and pocket parks, in line with Policy 66 'Managing Vehicle Traffic' and Policy 67 'Electric Vehicles'; and
- K. Improve air quality and noise pollution by promoting sustainable transport initiatives and reducing Nitrogen Oxide (NOx) emissions and exposure of vulnerable people to air pollution, in line with Policy 88 'Air Pollution' and Policy 63 'Development and Transport Impacts'.

**15.7** The delivery of vibrant, healthy, liveable and safe 15 Minute Neighbourhoods, meeting the Mayor of London's Transport Strategy aims, will increase physical activity and related well-being benefits amongst people who travel within Waltham Forest, including the proportion of physically inactive adults in the borough (26.6%), which is higher the London average (22%).<sup>(47)</sup>

**15.8** Promoting Sustainable Transport, along with the TfL's Liveable Neighbourhoods programme approach, has been at the forefront of the borough's 'Enjoy Waltham Forest' programme, which has delivered significant change in how people use their streets. Indicatively, where street changes have been delivered to reallocate street space for people who travel by foot or by bicycle, residents spend an extra 32 minutes per week walking, or 9 minutes cycling (Enjoy Waltham Forest, 2018). It is estimated that this has the potential to increase life expectancy of residents of these areas by 7 to 9 months by reducing health risks caused by inactivity.

**15.9** As set out in the Waltham Forest LIP3 (2019), the delivery of safe, active, and low traffic neighbourhoods is a proven approach to improving the health and wellbeing of communities. Drawing on TfL's Healthy Streets principles, and the Mayor's Vision Zero and London Streetspace Plan, the Council aims to realise these benefits through creation of self-sufficient, attractive and safe 15 Minute Neighbourhoods for everyone. This will reduce the impact of motor traffic on air quality, climate change, congestion and road safety, and rebalance street space towards people who walk, wheel, cycle, and spend time in their local streets, whilst improving people's mental well-being and reducing their risk of chronic illnesses and cardiovascular disease.



**15.10** Wayfinding through the Enjoy Waltham Forest programme is a key tool for enabling a modal shift towards walking, cycling and using active travel. Similarly, providing real-time information on services is a key tool to increasing access to public transport. New development in the borough should contribute to improving the experience of walking and cycling, including wayfinding that links key infrastructure, transport nodes, green spaces and canal towpaths where appropriate.

**15.11** Air pollution is associated with health issues, including respiratory conditions, heart disease and cancer affecting the most vulnerable in society, such as children and older people<sup>(48)</sup> In Waltham Forest, nearly 65% of Nitrogen Oxide (NOx) emissions come from road traffic.<sup>(49)</sup> Consistent with the Council's Climate Action Plan,<sup>(50)</sup> this Plan seeks to

47 Office for National Statistics (ONS), 2016. Population Estimates by Output Areas, Electoral, Health and Other Geographies, England And Wales Statistical Bulletins. Available at: <http://ons.gov.uk/ons/rel/sape/small-area-population-estimates/index>.

48 DEFRA (2006) Air Quality and Social Deprivation in the UK: an environmental inequalities analysis.

49 GLA (2013), Air Quality Data. London Atmospheric Emissions Inventory (LAEI). Available at: <https://data.london.gov.uk/dataset/london-atmospheric-emissions-inventory-2013>

50 [Waltham Forest Climate Action Plan](#)

reduce road transport and achieve the National Air Quality objective of reducing NOx emissions. The air quality in terms of NOx emissions is expected to improve between 2013–2020 based on forecasts for 2020,<sup>(51)</sup> and new developments are expected to contribute to and enhance sustainable transport initiatives (e.g. Car Club, Electric Vehicles and Bikes), safe road crossings where needed, and high quality placemaking with seating, signage and increased tree and vegetation coverage. Air Quality Study 2 (2023),<sup>(52)</sup> prepared in support of this Plan, shows that delivery of the inclusive spatial strategy it proposes, and planning policies it sets out, will achieve a significant reduction in road traffic and commensurate enhancements to air quality across the borough.

51 GLA (2016), London Atmospheric Emissions Inventory (LAEI). Available at: <https://data.london.gov.uk/air-quality/>

52 [Air Quality Study 2 \(2023\)](#)

## Policy 61

### Active Travel

All new development will be expected to support a shift to active transport modes and encourage an increase in walking and cycling. Proposals will be expected to:

#### Walking

- A. Improve the pedestrian environment by supporting high quality and safe public realm with appropriate facilities and amenities;
- B. Contribute towards the delivery of TfL's Liveable Neighbourhoods for All programme and the delivery of 15 Minute Neighbourhoods, through enhancements to walking connections to local destinations, transport hubs and amenities;
- C. Maximise opportunities to increase permeability of the public realm in and around the development for people travelling by foot, bike or public transport;
- D. Provide footpaths and footways that are wide enough for the number of people expected to use them and designed for vulnerable road users;
- E. Ensure that any improvements to access routes and/or green corridors would not result in adverse effects on the integrity of the Epping Forest Special Area of Conservation (SAC) and the Lee Valley Regional Park Special Protection Area (SPA);

#### Cycling

- F. Contribute to, and support the delivery of, high quality and safe strategic and/or local cycle networks in the borough, linked to public transport nodes, as well as public spaces, facilities and amenities;
- G. Ensure the provision of secure public and on-site cycle parking facilities for occupiers and visitors, that are compliant with Waltham Forest Parking Standards, London Plan requirements and London Cycling Design Standards (LCDS), at prominent locations within the development site;
- H. Deliver accessible cycle parking and appropriate off-street storage for people using cargo bikes or adapted cycles, hand carts and for people who may not be able to lift bikes (including ground floor retail and takeaway food outlets);
- I. Provide well designed, accessible facilities including prominent and well located showers, changing rooms and lockers. The provision should be proportionate to the scale of development and cycle parking provided;
- J. Promote and contribute towards the introduction and expansion of cycle hire facilities or any other sustainable transport initiatives; and
- K. Ensure that any improvements to access routes and/or green corridors would not result in adverse effects on the integrity of the Epping Forest Special Area of Conservation (SAC) and the Lee Valley Regional Park Special Protection Area (SPA).



**15.12** As stated in the Mayor of London's Healthy Streets for London report, increasing physical exercise is an important tool in tackling many of the borough's health challenges, including mental health disorders (affecting 22.5% of the population aged 16+),<sup>(53)</sup> cardiovascular disease (a common cause of death in the borough), hypertension (11% of the patients in NHS Waltham Forest Clinical Commission Group), obesity (10.5% of children in Reception, 23.4% of children in Year 6 and 52.9% of residents 18+), and diabetes (10.1% of the borough population).<sup>(54)</sup> While Waltham Forest enjoys a higher than average mode (across outer London) share for active travel, there is significant potential to increase this number further. It is estimated by TfL that 240,700 more trips could be cycled every day in the borough and 73,400 could be walked.

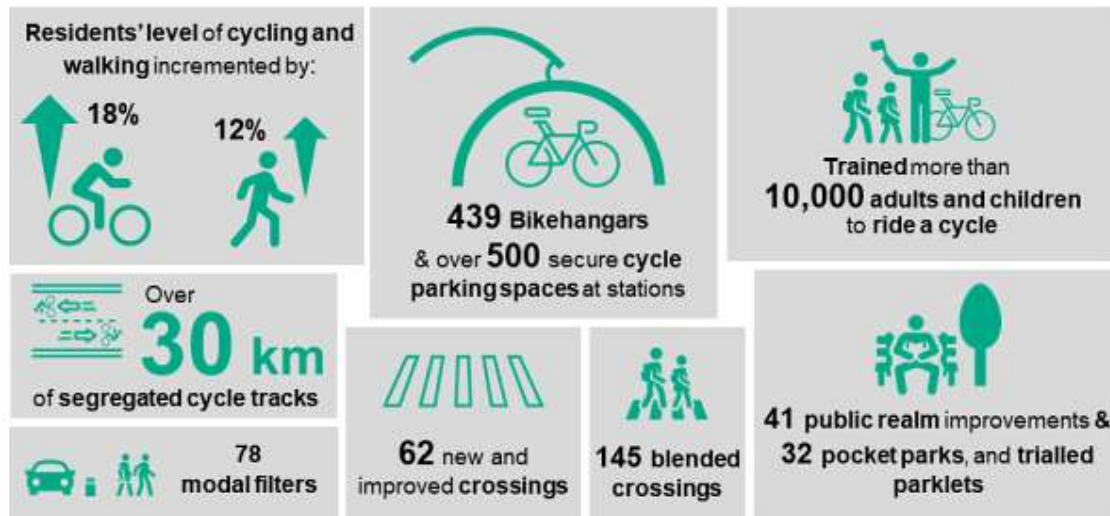
**15.13** Consistent with the aims of the TfL Walking and Cycling Action Plans, the borough is committed to delivering continued street improvements that enable people to build active travel into their everyday lives and achieve the Mayor of London's aim of 20 minutes of active travel each day by 2041. Central to achieving this aim is the removal of barriers that deter people from walking and cycling, including concerns around road danger, high traffic volumes and speeds, lack of dedicated infrastructure, and poor legibility to support journeys.

**15.14** As an example of this, in recent years, through the Enjoy Waltham Forest programme, the Council has evidenced the importance of prioritising road users other than private cars in new developments.<sup>(55)</sup> The 2018 report entitled 'Impacts of an active travel intervention with a cycling focus in a suburban context', shows the benefits that Waltham Forest has achieved by delivering high quality infrastructure, interventions and training, which has certainly increased residents' levels of cycling and walking. The Council will seek to continue these achievements by promoting active travel when assessing planning applications.

53 Waltham Forest. Joint Strategic Needs Assessment (JSNA). Mental Health and Wellbeing. Available at: <https://lbwf.maps.arcgis.com/apps/MapSeries/index.html?appid=9204d47eb24d4f288a7fc4c442c9f24d>

54 Public Health England. Local Authority Health Profiles, Cardiovascular disease, Child and Maternal Health, and Diabetes. Available at: <https://fingertips.phe.org.uk/>

55 Walking and Cycling Account 2019. Available at: <https://enjoywalthamforest.co.uk/wp-content/uploads/2020/05/Walking-and-Cycling-Account-2019.pdf>. Impacts of an active travel intervention with a cycling focus in a suburban context: One-year findings from an evaluation of London's in-progress mini-Hollands programme, Rachel Aldred, Joseph Croft and Anna Goodman, Transportation Research Part A: Policy and Practice, June 2018



**Figure 15.2 The impact of Enjoy Waltham Forest (Walking and Cycling Account 2019)**

**15.15** Figure 15.3 shows the Council's existing and future strategic cycle network as set out in the 2020 Vision for Cycling in Waltham Forest. The network will provide safe, attractive cycle network that meets the Mayor of London's aim for 70% of residents to live within 400 metres of the London-wide cycle network. Alongside the strategic network, the Council aims to deliver a permeable, low traffic cycling network within residential areas, offering ultimate route choice for users. When combined, the network will provide comprehensive connections between homes, town centres, growth areas and employment areas, schools and the wider cycle network.

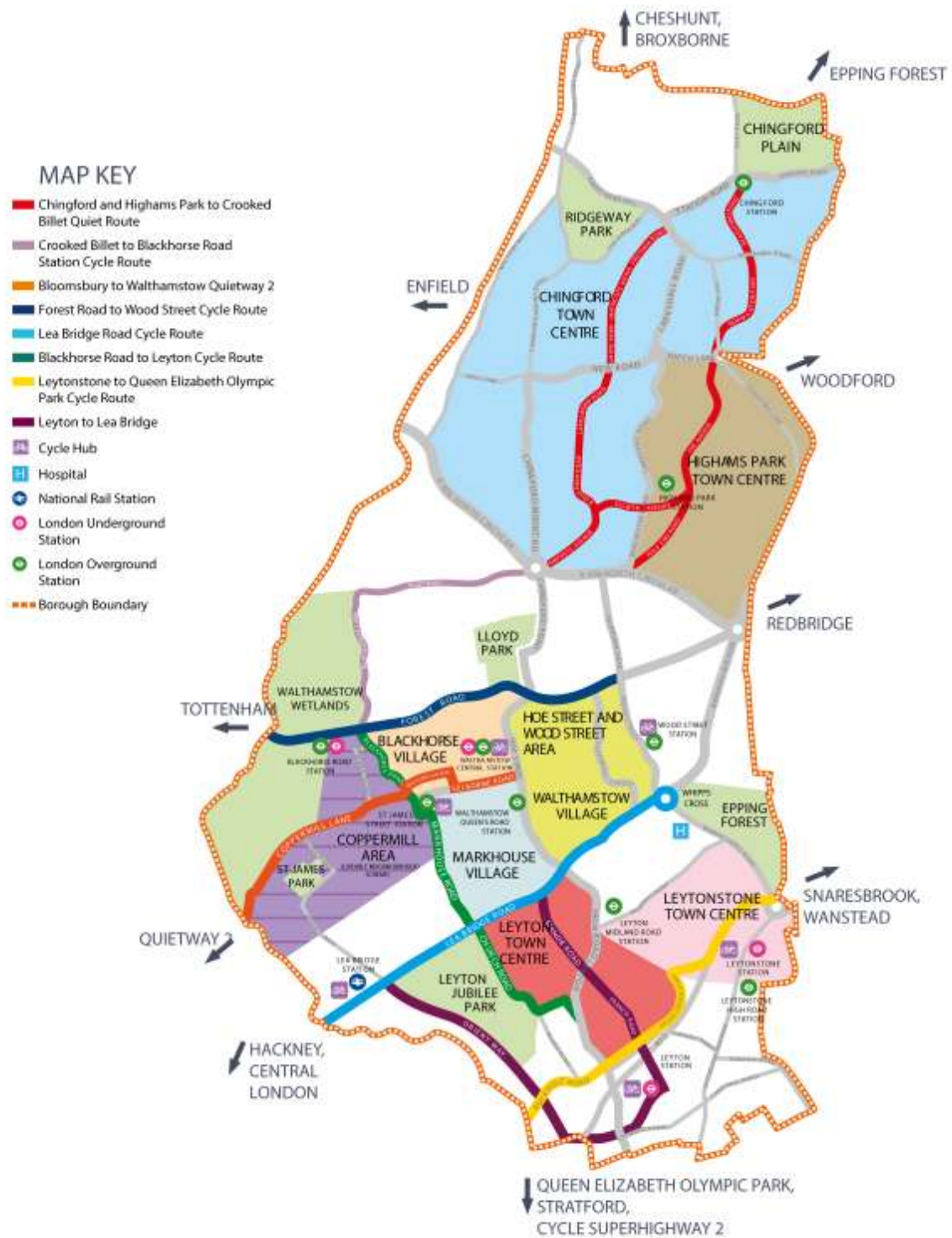


Figure 15.3 Existing and Future strategic cycling network in Waltham Forest

## Policy 62

### Public Transport

The Council will ensure that development is properly integrated with the public transport network by:

- A. Working with TfL, Network Rail and other partners to reopen the Meridian Line and to facilitate improvements to public transport infrastructure (Bus, National Rail, Underground, or Overground network) with regard to capacity, provision of interchanges, step-free access and the phased introduction of a fully electric bus fleet;
- B. Ensuring connectivity and integration of the public transport network with other transport modes, including walking and cycling within and outside the borough;
- C. Supporting public transport schemes that seek to improve connectivity to areas with lower Public Transport Accessibility Levels (PTAL), in line with Policy 94 'Infrastructure and Developer Contributions'; and
- D. Seeking developer contributions towards enhancing public transport provision and infrastructure in order to mitigate any likely adverse impact of development.

**15.16** Provision of a public transport network that is fit for purpose, accessible, and future-proofed is vital to unlocking sustainable and inclusive growth and improving the life chances of people who live and work in Waltham Forest.



**15.17** While the borough has strong connections to Underground, Overground, National Rail, bus and active travel networks, significant improvements are needed to ensure infrastructure

is able to support changing demands of residents, businesses and visitors. To support the Council's ambitious plans for regeneration and inclusive growth, the Council's Transport Infrastructure: Growth & Investment Strategy (2018) and LIP3 (2019) have identified a number of major rail and bus projects to improve local and London-wide connectivity. In addition, the borough is set to benefit from its proximity to the Elizabeth Line and, potentially, Crossrail 2.

**15.18** The Council has long-term aspirations to reinstate the rail service referred to as the Meridian Line and has previously campaigned for this project. This is a short stretch of track linking the Chingford to Liverpool Street route to the Coppermill Junction to Stratford line.

This will meet the increasing need to connect the borough to Stratford City, the Olympic Park and other major regeneration areas in the Lower Lea Valley. The Council will continue work with partners to develop a business case for this project.

**15.19** Priority measures include increasing the capacity and comfort of existing public transport infrastructure, as well as enhancing the current transport network through the delivery of new interchanges and connections. It is also essential that the public transport network meets the needs of a changing population, placing emphasis on delivering a fully accessible transport network by expanding the step-free network and accessible links to and within public transport hubs across Waltham Forest.

**15.20** In accordance with Policy 62 'Public Transport', new development will be expected to mitigate its impact on local public transport services, as well as improving connectivity to areas that are underserved by public transport, in line with the Planning a Smarter, Greener Bus Network in the Council's Transport Infrastructure: Growth & Investment Strategy (2018) and with the Community Infrastructure Levy Regulations.

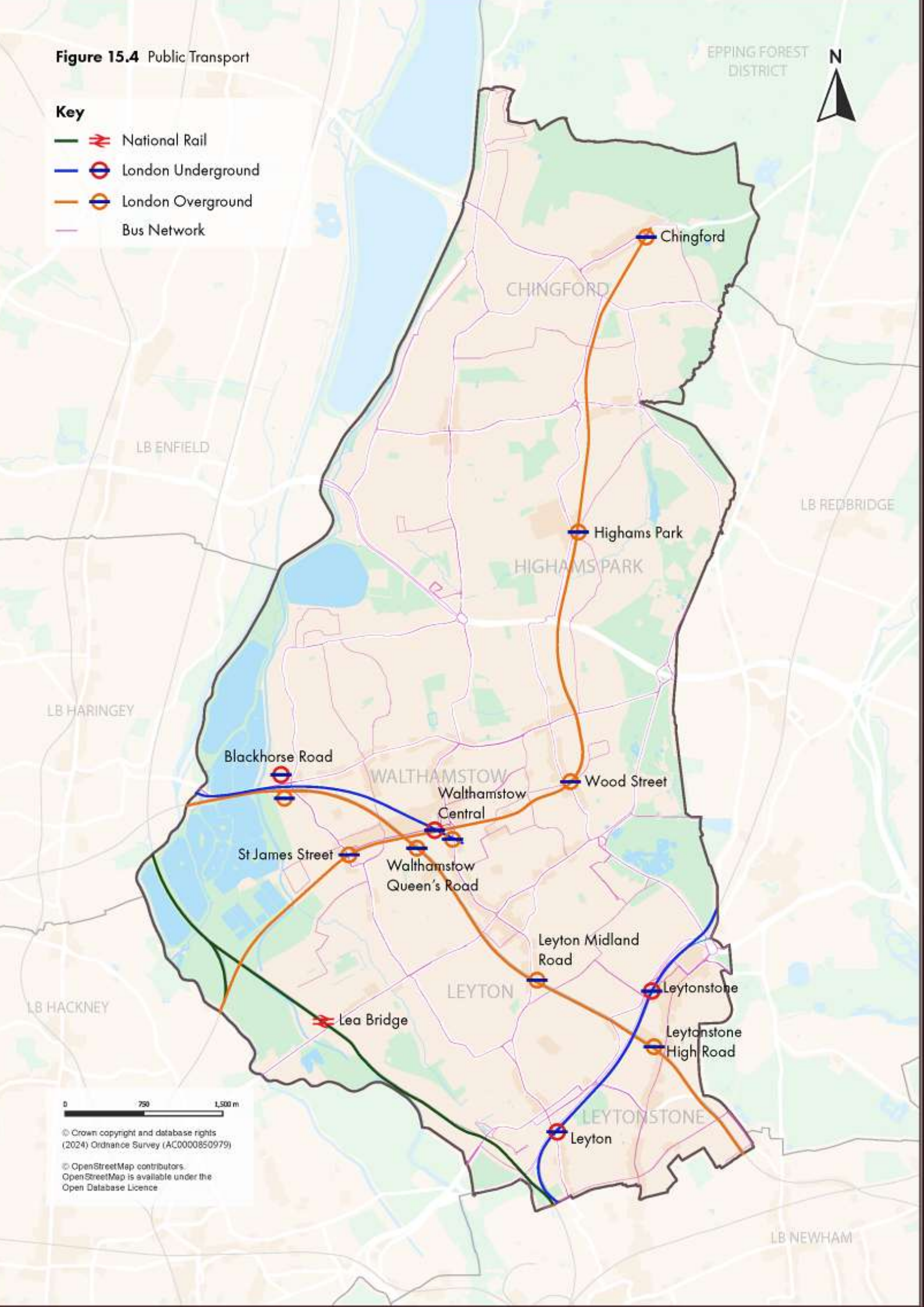


**15.21** This requirement will apply, for example, where there are no bus network routes or an area is underserved by public transport. The objective in this case should be to improve connectivity and operation of the bus network (including bus priority works, provision of new or extended bus routes, or increasing frequency of existing services). The borough is committed to working closely with TfL and developers to unlock funding for bus services. All contributions towards new transport infrastructure will be further guided by requirements specified in Policy 94 'Infrastructure and Developer Contributions' and the Developer Contributions Supplementary Planning Document (SPD).

Figure 15.4 Public Transport

Key

-  National Rail
-  London Underground
-  London Overground
-  Bus Network



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**Policy 63****Development and Transport Impacts**

To effectively assess the impacts of development and agree suitable mitigations and monitoring, major development proposals should be submitted with the following documentation:

- A. A Transport Assessment (TA) showing how the development will contribute towards meeting local and London-wide transport objectives, identifying and mitigating development impacts, and detailing measures to achieve this (including street improvements, on-site facilities and engagement);
- B. A site Travel Plan (TP) detailing how development will enable walking, cycling and public transport use amongst users, including agreed targets, implementation, funding and monitoring regime(s) - all of which will be secured through Section 106 contributions along with the appropriate monitoring fee;
- C. A Construction Logistics Plan (CLP) setting out the potential impacts of construction traffic, and how this will be reduced. An Outline CLP should be submitted at application stage, followed by a Detailed CLP at the pre-construction phase, in line with Policy 65 'Construction Logistic Plans'; and
- D. A Delivery and Servicing Plan (DSP) detailing how the development will minimise the adverse impacts of deliveries, freight and servicing at both the construction and operational phases in accordance with Policy 64 'Deliveries, Freight and Servicing'.

For minor development, the requirement for a TA, TP, CLP or DSP will be assessed on a case by case basis, having regard to the transport impacts of the development.

**15.22** In order to fully assess the impacts of new developments on the transport network and to ensure development contributes to encouraging walking, cycling and public transport use, Transport Assessments (TAs), Travel Plans (TPs), Construction Logistics Plans (CLPs) and Delivery and Servicing Plans (DSPs) will be required in support of planning applications. These should be submitted for all major developments, and on a case by case basis for minor developments where there is no Controlled Parking Zone (CPZ) in place, servicing and deliveries are not possible within the red line boundary, and/or where the development will have a significant impact on the public highway. Draft Transport Assessments (TAs) should be provided at the pre-application stage for all major schemes. These should be prepared in accordance with current best practice guidance, including TfL's Healthy Streets Transport Assessment (2019), Travel Plan Guidance (2020), Construction Logistics Plan Guidance (2020) and Delivery and Servicing Plans Guidance (2020) (or relevant equivalents as this guidance is updated).

**15.23** The Department for Levelling Up, Housing and Communities (DLUHC) defines Travel Plans (TPs) as long-term management strategies for integrating proposals for sustainable travel into the planning process. They are based on evidence of the anticipated transport impacts of development (and will be used in line with monitoring indicators set out in Policy 95 'Monitoring Growth Targets') and set measures to promote and encourage sustainable

travel (such as promoting walking and cycling). TP implementation is an ongoing process requiring regular monitoring, review and adjustment to ensure agreed objectives are delivered. The borough is set to publish guidance on TPs and monitoring requirements and once published all TPs should be prepared in accordance with this guidance.

## Policy 64

### Deliveries, Freight and Servicing

All development within the borough should seek to minimise the adverse impacts of deliveries, freight and servicing at both the construction and operational phases by:

- A. Using sustainable transport initiatives and zero emission vehicles, such as cargo bikes and electric vehicles, for servicing trips and last mile deliveries;
- B. Reducing the number of freight, servicing and delivery trips to and from developments at the operational and construction phases;
- C. Managing freight and servicing by utilising local and area-wide facilities to consolidate and time deliveries;
- D. Operating facilities and measures to reduce waste collection trips, such as consolidated waste collection for businesses, and underground waste storage;
- E. Optimising the arrangement of deliveries outside of peak hours;
- F. Managing road danger resulting from freight and servicing vehicles by using suppliers that meet Fleet Operator Recognition Scheme (FORS) Silver standard; and
- G. Where appropriate, promoting facilities to enable efficient online retailing and minimise additional freight trips arising from missed deliveries, including storage lockers or concierge services.

A Delivery and Servicing Plan (DSP) is required for all major development schemes and on a case by case basis for minor developments where there is no Controlled Parking Zone (CPZ) in place, servicing and deliveries are not possible within the red line boundary, and/or where the development will have a significant impact on the public highway.

**15.24** When unmanaged, the movement of goods and servicing vehicles to and from developments can create significant impacts on local environments; including high levels of Heavy Goods Vehicles (HGVs), Light Commercial Vehicles (LCVs) and white van traffic, increased levels of air pollution, a reduction in road safety for vulnerable users, and poorer experience of streets for those travelling actively. Therefore, developments should incorporate Delivery and Servicing Plans (DSPs) as part of scheme design, including operating hours, impact on public highway, monitoring and enforcement procedures to optimise the frequency and timing of delivery to the site and submit these as part of planning applications process.





**15.25** In Waltham Forest, while vehicle kilometres driven has reduced, the Department for Transport estimates that between 2013 and 2016 there was an increase of 23% in LCVs and HGVs, which make up 20% of traffic on these roads. The borough is committed to working with developers and TfL to reduce the levels and impact of construction, servicing and delivery freight, utilising best practice guidance, such as in the TfL Freight and Servicing Action Plan.

**15.26** New development is expected to apply innovation to change construction and operational practices around freight and deliveries, by reducing the need for large vehicles and multiple vans to travel into and around the borough. Examples of this already applied in Waltham Forest include reducing, consolidating and re-timing deliveries, installation of delivery lockers on sites, waste consolidation to reduce the number of collection trips made to site and promotion of Zero Emission Deliveries (ZED). To date these initiatives have resulted in an estimated saving of 9.5 tonnes CO<sup>2</sup> emissions.<sup>(56)</sup>

## Policy 65

### Construction Logistic Plans

To minimise the impact of construction logistics on the road network all new residential and commercial development in the borough should enable efficient and sustainable servicing and delivery of goods, waste and servicing activity to and from sites. Proposals should be supported by an Outline Construction Logistics Plan (CLP), where appropriate, to satisfy the following requirements:

- A. Reduce the potential impact on the local community through a comprehensive and thorough risk assessment;
- B. Minimise construction traffic and manoeuvres that place other road users at risk by providing or ensuring safe routes to the site for construction traffic, and avoid air quality sensitive areas (including roads within the Epping Forest Special Area of Conservation (SAC)), areas with concentrations of vulnerable road users, including schools and town centres, and areas with high densities of people walking and cycling;
- C. Reduce construction traffic and manoeuvres in the main roads in order to minimise potential traffic congestion in town centres;
- D. Through Delivery and Servicing Plans (DSPs), consolidate freight deliveries with other local and regional development sites or/or use appropriate consolidation facilities;

56 Walking and Cycling Account 2019. Available at: <https://enjoywalthamforest.co.uk/wp-content/uploads/2020/05/Walking-and-Cycling-Account-2019.pdf>

- E. Minimise road danger resulting from construction vehicles by using suppliers that meet Fleet Operator Recognition Scheme (FORS) Silver standard; and
- F. Promote the use of the safest vehicles, suitable for the site and its ground conditions, including those that meet direct vision standards and are fitted with enhanced vulnerable road user safety features such as pedestrian and cyclist autonomous emergency braking, intelligent speed assistance and alcohol interlock systems.

Construction Logistics Plans (CLPs) will:

- G. Minimise impacts on the local transport network by identifying opportunities for site delivery and collection management, and locating all vehicle loading and unloading facilities within the boundary of major development.
- H. Be used as a monitoring tool to be adhered to, and will be reviewed and updated as necessary prior to the start of each new phase of construction;
- I. Be required prior to commencement of development. They will be required at sites that will, or have the potential to, impact on the highway network, public transport services and/or sustainable transport, have difficult access and/or may affect nearby developments or surrounding residents; and
- J. Be required to adhere to the CLP guidance and templates.

**15.27** This policy applies to all development. However, the Council accepts that judgement on a case by case basis is also required to whether a development proposal will generate a significant impact on the road network. Where appropriate, detailed CLPs will be required prior to commencement of development. All applications should apply and adhere to the CLP guidance at [Construction Logistics](#) and use templates provided by the Council and TfL websites.

**15.28** CLPs are a key tool in managing the environmental and safety impact of freight and deliveries to construction sites. When applied, they enable the reduction of the volume and risk of construction movements, consolidation of vehicle movements, re-timing of deliveries out of peak hours, avoidance of areas and times with high levels of vulnerable road users, the shifting of road based deliveries towards other modes such as rail and water based modes and the coordination of activities between nearby sites.

**15.29** In addition to reducing the environmental impacts of construction, effective application of CLPs delivers wider benefits to applicants by enabling reduced costs through efficient, well planned working practices and reduction in the frequency and volume of deliveries. The use of logistics and consolidation centres provide wider benefits, including reduced risk of theft of materials on-site, consolidation of vehicle movements, a more secure supply chain, and shared waste management.

**15.30** A CLP will be expected for most development sites where new building work is taking place. The CLP requirements depend on the potential impact of the site on the highway, as viewed by the Council's Highways team, which will determine the level of impact. The impacts are considered in terms of location, size, number of construction vehicle trips, temporary highways arrangements, access and other factors (see table below). Detailed CLPs will be

required for sites that are deemed to have the potential to detrimentally impact the highway network, road safety, congestion, or the environment through construction access. This includes sites that:

- Will generate high levels of construction traffic to and from the site;
- Will impact local and regional road capacity and congestion throughout the construction stages; and
- Will increase the cumulative impact of construction traffic or movements within the local area.

Planning Stage	Level of Impact		
	Lower	Medium	Higher
Planning approval	Outline CLP	Outline CLP	Outline CLP
Pre-construction	No CLP required	Detailed CLP	Detailed CLP

Table 15.1 Construction Logistics Plans Requirements

**15.31** In locations with high levels of development, area-wide CLPs will be developed by the Council. Development within areas covered by area-wide CLPs will be expected to adhere to these plans by developing site specific CLPs that conform the area-wide CLP, and where appropriate, contributing to their development and monitoring. Section 106 legal agreements will secure appropriate monitoring of approved CLPs during the construction period, to ensure that development sites are using the agreed vehicle routes and Planned Measures.

**Policy 66**

**Managing Vehicle Traffic**

In order to encourage and promote active and sustainable transport as the main means of travel in Waltham Forest, to improve air quality, improve personal health and well-being and respond to the Climate Emergency, all new residential developments (major and minor) in the borough should be car-free.

Where car parking is required, the following considerations will apply:

- A. In the case of proposed developments in less well connected areas, a robust Transport Assessment (TA) must be provided to justify the need for any deviation from car-free development, in line with London Plan policies;
- B. Proposals must not exceed the maximum parking standards set out in the London Plan and in 'Appendix 1 - Parking Standards' of this Plan. For mixed-use schemes, specific parking should be provided for different uses;
- C. Disability Discrimination Act compliant (DDA) (Blue Badge) parking spaces should be provided for all developments, including car-free proposals in accordance with best

practice standards, as set out in the London Plan and 'Appendix 1 - Parking Standards' of this Plan;

- D. Parking or loading provision for essential operational or servicing needs must be justified through a TA, in line with Policy 63 'Development and Transport Impacts';
- E. Where other car parking (including motorcycle parking) is exceptionally provided it must not exceed London Plan and the parking standards set out in 'Appendix 1 - Parking Standards';
- F. New development must incorporate designated spaces for deliveries within the boundaries of the development and, where appropriate, must provide Delivery and Servicing Plans (DSPs) which encourage provision for low-emission, consolidation and last mile delivery modes in line with Policy 64 'Deliveries, Freight and Servicing';
- G. Car parking in new developments for GPs, health and educational facilities will be supported by following 'Appendix 1 - Parking Standards' and London Plan policies;
- H. Operational parking for business and industry uses will be permitted when need is clearly demonstrated within a TA, and measures have been applied to minimise the number of vehicles, frequency and impact of trips. All operational vehicles should be electric or meet the Euro Emissions Standards outlined by the Ultra Low Emission Zone (ULEZ) and operational parking should include infrastructure to support Electric Vehicle Charging;

### **Parking Management**

- I. Where parking is provided as part of a development, proposals must be supported with a Car Parking Management Plan detailing the mechanism for leasing spaces, the provision of disabled parking to meet future demand, and activation of passive electric charge points, in accordance with London Plan guidance on Parking Design and Management;
- J. Proposals must ensure that disabled parking spaces in residential developments are only used by Blue Badge holders who are occupiers of wheelchair accessible homes in the development. Disabled spaces must not be sold off or leased to other residents;
- K. A car-free agreement within legal agreements will be required, restricting new residents from accessing parking permits within existing Controlled Parking Zones (CPZs) or ensuring future CPZs are in place before a development is occupied;
- L. Where roads in close proximity to the site are not managed, or not adequately managed by parking controls, appropriate financial contributions will be sought to secure the delivery of CPZs;

### **Estate Regeneration**

- M. Where car parking is reprovided as part of Council housing estate regeneration schemes, proposals must be supported with a Car Parking Management Plan. The plan must outline how car parking will be reduced to meet the minimum need of returning residents, detail the mechanism for leasing spaces and the provision of Blue Badge parking to meet future demand, and specify activation of passive electric charge points, in accordance with London Plan guidance on Parking Design and Management. Where car parking exceeds Council parking standards, evidence of parking need should be provided;

- N. Reprovided car parking spaces for existing residents should at no point be offered to new residents. Therefore the Car Parking Management Plan should set out how spaces will be repurposed in the future for uses such as pocket parks, play spaces and additional cycle parking; and
- O. Car parking provision should be flexible for different users and adaptable for future repurposing to benefit the whole community.

#### **Car Clubs**

New development will be required to contribute to the borough's public car club network by:

- P. Providing accessible car club spaces on-site or contributions to deliver car club bays on-highway;
- Q. Encouraging residents to use the network as an alternative to car ownership with a free membership and active promotion;
- R. Contributing to the monitoring of the schemes through Section 106 agreements, in line with Policy 94 'Infrastructure and Developer Contributions'.

**15.32** As outlined in TfL's Healthy Streets for London Report, car ownership is a key determinant of transport choice and car use across London. Effective management is essential to reducing private car travel, and realising the health and well-being benefits of improved air quality, decreased noise disturbance and local congestion, and increased physical activity. The car parking standards (included in 'Appendix 1 - Parking Standards') are intended to assist in achieving, by 2041, the Mayor's target of 80% of trips being made by sustainable transport modes, reducing the level of car use and ownership by 12%, increasing the level of sustainable transport modes by 55%, and reducing CO<sub>2</sub> emissions.



**15.33** In line with the Mayor's target, which is also part of Council's Transport Infrastructure: Growth & Investment Strategy (2018) and LIP3 (2019), and taking into consideration the Ultra Low Emission Zone (ULEZ) expanding across all London boroughs, Waltham Forest is committed to accelerating the London-wide trends towards car-free and low-car development. The maximum car parking standards are set to reflect this.

**15.34** The Council has an excellent track record of promoting sustainable transport and active travel modes across the borough, especially where developments are well connected to public transport, active travel networks and local amenities. This follows an upwards shift in people travelling by foot, bicycle and public transport in Waltham Forest, and a five per cent reduction in the number of car kilometres driven on borough roads since 2016 (the third highest decrease across all boroughs).

**15.35** The Council recognises that less well connected areas may require some levels of car parking within new developments, and this will be reflected within robust assessments of relevant local factors including potential public transport provision. TfL's Public Transport Accessibility Levels (PTALs)<sup>(57)</sup> and the distribution of existing CPZs in the borough show that the north of the borough has a lower accessibility level to public transport and a higher car dependence. Between 0-37.5% of this population do not have access to a car, compared with 50-75% in the south and central areas of the borough.<sup>(58)</sup>

**15.36** Car clubs play an important role in supporting people to transition away from car ownership, especially when paired with wider incentives such as management of residential parking, improvements in public transport, and new cycling and walking facilities. Evidence

57 PTALs combine walk times from a chosen point to the network (stations and bus stops, for example) together with service frequency data at these locations. This provides an overall access index which can be allocated to nine accessibility levels between 0 and 6b Available at: <https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-with-webcat/webcat>

58 Office for National Statistics (ONS). Census, 2011.

provided by CarPlus, shows that car club members are more likely to walk, cycle or take public transport, and that 28% of car club members based in London have reduced the number of vehicles owned by their household since joining a car club.

## Policy 67

### Electric Vehicles

Where development provides car parking through either re-provision or when car parking has been justified through a Transport Assessment (TA), it should accelerate uptake of electric vehicles by:

- A. Providing infrastructure for electric vehicle charging, including a minimum of 20% of spaces to have active charging facilities at the outset, with passive provision for all remaining spaces;
- B. Demonstrating within Car Parking Management Plans how occupants using electric vehicle charge points will be charged fairly and consistently, and how the number of EV charge points will be increased to meet demand;
- C. Incentivising ownership and use of electric vehicles through measures including reduced rate parking charges or leases for spaces, or subsidised electricity in line with London Plan guidance; and
- D. Contributing to the borough's publicly accessible rapid charging and on-street charging network, especially where development is served by electric vehicles for taxis and deliveries and servicing.

**15.37** Despite a reduction in kilometres driven, vehicle emissions continue to be the primary pollution source in Waltham Forest. The highest pollution concentrations are seen on the two TfL's Strategic Road Network roads, the A12 and A406 North Circular Road, however pollution remains high on many local roads, impacting the residential streets, town centres and services such as schools and leisure centres which surround them. It is estimated that 50 Waltham Forest residents a year are admitted to hospital as a result of exacerbation of asthma due to air pollution from vehicle emissions (including 13 children and 27 people aged over 65).

**15.38** Accelerated uptake of electric and ultra low emission vehicles is essential to delivering improvements to air quality and a zero emission transport network in Waltham Forest. Electric vehicle ownership in Waltham Forest is expected to rise by 700% by 2025 (177 to 2,457), and the Council aims to deliver 2,500 chargers by March 2026. Although new development is expected to minimise vehicle travel, when it increases resident and servicing vehicles on the road network, development will be expected to contribute to the uptake of electric vehicles, and delivery of charging infrastructure. Research has also found that children living in the borough will live an average of six weeks longer because of improved air quality and lower traffic volumes.<sup>(59)</sup>

59 Air quality: concentrations, exposure and attitudes in Waltham Forest. David Dajnak, Heather Walton, Gregor Stewart, James David Smith and Sean Beevers, King's College London, 2018

## Utilities and Digital Connectivity

**15.39** Utilities have a vital role to play in facilitating sustainable growth in the borough as quality of life and social well-being rely on the supply of high quality, reliable and affordable utilities, including digital connectivity.

**15.40** High speed digital connection is now widely seen as an everyday essential alongside traditional utilities such as water, gas and electricity. There has also been a strong shift away from traditional models of working, retail and service delivery, with many residents in the borough operating businesses, working remotely and ordering goods and services from home. This highlights the importance of fast, reliable and affordable digital connection to the local economy. Creative businesses, in particular, are especially reliant on fast and reliable digital connectivity.

**15.41** The benefits of digital technology extend further. Employing a Smart Cities approach, enhanced digital infrastructure can deliver many further benefits and solutions to residents and businesses in the borough, such as reducing the need to travel - thereby reducing peak demand on public transport and improving congestion and improving air quality whilst at the same promoting productivity and the overall economy.

**15.42** This policy seeks to ensure that all new developments incorporate next generation mobile technology (such as 5G) and full fibre broadband connections.

**15.43** The Council has strong links with the various infrastructure providers that service the borough, including Thames Water, UK Power Networks, Cadent (Gas), National Grid and various digital connectivity providers. The continuation of this cooperative working relationship is key to ensuring delivery of this policy. Developers, landowners and building occupants also have a role to play in demand management, early engagement with utility providers and cooperative working to avoid disruption.

**15.44** Further information on necessary and planned utility infrastructure improvements will be set out and updated annually in the Council's Infrastructure Delivery Plan (IDP).

### Policy 68

#### Utilities Infrastructure

All major development proposals will be expected to:

- A. Carry out early pre-application engagement with infrastructure providers to demonstrate that there is sufficient infrastructure capacity to support the proposed development from commencement. Where there will be a deficit, the developer will be expected to ensure that relevant infrastructure will be provided as part of the proposals and secured through a Section 106 planning obligation;
- B. Ensure utility infrastructure and connections are designed into the development from the outset wherever possible. As a minimum, developers should identify and plan for:
  - i. Electricity supply with providers as part of development proposals;



- ii. Gas and water supply/wastewater discharge, considering the need to conserve natural resources;
- iii. Heating and cooling demand and the viability of its provision via decentralised energy (DE) networks;
- iv. Entry and connection points from utility providers within developments.

**15.45** Early engagement with infrastructure providers is essential to ensure that sufficient capacity is available in the wider infrastructure network to service the development in both the construction and operational phases, and that suitable connection layouts and future-proofing are considered early in the design stage. In some circumstances it may be necessary for developers to carry out studies to see if the proposed development will lead to overloading of existing infrastructure. Adequate time should be allowed to consider supply options concerning the construction and operational phases to allow utility providers to provide an informed response. Realistic projections of electricity demand should be provided in order to promote efficient delivery of necessary infrastructure. The cumulative impact of proposed developments in the proposals' vicinity must be taken into account through discussions with utility providers and at pre-application meetings with the Local Planning Authority. Coordination of infrastructure works is essential to minimise the level of disruption and impact on existing services associated with provision.

**15.46** The Sustainability/Energy Statement which accompanies the application may be used to demonstrate engagement with utility infrastructure providers and set out the servicing and demand management measures that are to be incorporated. The Sustainability/Energy Statement may include a joint statement of intent endorsed by the relevant utility providers. Section 106 agreements may be used to ensure continued engagement regarding route planning and confirmation of load demands.

**15.47** Digital Infrastructure comprises physical telecommunications components such as fixed broadband and mobile connectivity, which improves the lives of residents and local economic productivity. The NPPF, Future Telecoms Infrastructure Review (FTIR), and other policy documents issued by Building Digital UK (BDUK) all refer to the importance of high-quality digital infrastructure to the UK economy.

**15.48** The Council will seek to ensure that all new development, and wherever possible all residents and businesses, have access to full-fibre speeds of internet connectivity.

## Policy 69

### Digital Infrastructure

Planning permission will be granted for all new major developments where:

- A. They are served by full-fibre broadband capable of gigabit download speeds;
- B. The full-fibre broadband connections are available at the point of releasing for sale, where relevant, and that the cost of the services are at market rates, preferably offering broadband services from more than one service provider;

- C. Developers work with a recognised network carrier to design appropriate duct infrastructure for the installation of fibre broadband by a range of operators;
- D. Other forms of digital infrastructure, such as facilities supporting mobile phone broadband, are included wherever possible; and
- E. The siting and appearance of utilities infrastructure is designed to minimise impacts on amenity and to be as unobtrusive as possible.

Planning permission will be granted for new electronic communications infrastructure where:

- F. It is supported by the necessary evidence to justify the proposed development in accordance with the requirements of national policy;
- G. Proposed equipment is sympathetically designed to minimise impacts on amenity and secluded or camouflaged where appropriate;
- H. It can be demonstrated that electronic communications infrastructure is not expected to cause significant and irreversible interference with other electrical equipment, air traffic services or instrumentation operated in the national interest;
- I. Adverse impacts on the successful functioning of existing digital infrastructure are avoided. Where this is not practicable, appropriate mitigation shall be provided;
- J. It does not result in the International Commission guidelines on non-ionising radiation protection being exceeded; and
- K. Appropriate pre-application consultation in accordance with national policy has been undertaken.

**15.49** The Council's Digital Strategy (2018)<sup>(60)</sup> seeks to enable delivery of full-fibre gigabit broadband connections at affordable prices to every resident and business in the borough. A number of other policies throughout this Plan also note the importance of high quality future digital connectivity to achieve their long term objectives.

**15.50** As set out in the London Plan, to achieve greater digital connectivity than set out in part R1 of the building regulations<sup>(61)</sup> new development should seek to:

- safeguard existing communications infrastructure, or where a significant adverse impact has been identified, prepare an impact statement and implement a mitigation plan as necessary through a Section 106 agreement prior to occupation of the proposed development, especially in relation to mobile connectivity;
- co-locate services where possible on existing structures, such as masts, or within appropriate street furniture, such as street lighting, to ensure the effective use of public realm to accommodate well-designed and located mobile digital infrastructure that mitigates the impact of new infrastructure on the existing built environment; and
- ensure that sufficient ducting space is provided for future digital connectivity infrastructure.

60 <https://democracy.walthamforest.gov.uk/documents/63159/Digital%20and%20Technology%20Strategy%20Appendix%20A%20-%20Digital%20and%20Technology%20Strategy.pdf>

61 [https://www.planningportal.co.uk/info/200135/approved\\_documents/124/part\\_r\\_-\\_electronic\\_communications](https://www.planningportal.co.uk/info/200135/approved_documents/124/part_r_-_electronic_communications)

**15.51** Delivery of full-fibre broadband infrastructure, as well as mobile infrastructure including 5G, is a priority to achieve the government's targets set out in the FTIR.<sup>(62)</sup> The council recognises the importance of this and is implementing a range of complementary initiatives aimed at achieving government targets for full-fibre and 5G coverage. These are set out in the Infrastructure Delivery Plan (IDP).

**15.52** The volume of planned development in the borough and the congestion of cables and pipes under the borough's streets create a challenge for new infrastructure to be installed without causing disruption to the borough's public realm and street network. Pipe subways and ducting provide a means of reducing the level of disruption during installation and when undertaking maintenance of infrastructure. Existing subways and ducting must be used wherever possible for the installation of utility infrastructure. Expansion and integration of pipe subway, ducting infrastructure and decentralised energy networks is a long-term aspiration of the Council in order to both improve coverage and to minimise any disruption due to utility works. Extensions to existing pipe subway or ducting networks will be sought where there is adequate evidence that services to developments would be better integrated within an established network in the vicinity.

### Risk Management

**15.53** Fluctuations in the economic cycle may reduce the level of funding available for infrastructure upgrades but will also impact on the need to expand infrastructure. The borough will consider the demand for, and funding of, infrastructure improvements through the Infrastructure Delivery Plan (IDP), prioritising the allocation of funds where necessary.

**15.54** Climate change could alter future infrastructure demand patterns. For example, greater need for air conditioning in summer months could create demand more demand for electricity. The Local Plan addresses this by requiring sustainable building designs.

**15.55** Changing business practices, e.g. the reducing prominence of traditional industries, or changes in the borough's business mix, may impact on the level of utilities required and the spatial distribution of demand. Continued monitoring of trends will highlight any issues in this respect, identifying any need to review this policy or the IDP.

**15.56** Rapidly changing technology and infrastructure needs may impact on the visual amenity, character and appearance of the borough. The Council will work with utility providers to ensure that new infrastructure proposals are designed and sited to minimise any such adverse impacts.

### Implementation

**15.57** The main tools the Council has in delivering the policies in this section of the Plan are through:

- The Infrastructure Delivery Plan (IDP) and Infrastructure Delivery Schedule;
- Masterplans;
- Developer Contributions Supplementary Planning Document (SPD);

62 <https://www.gov.uk/government/publications/future-telecoms-infrastructure-review>

- Section 106 agreements and contributions;
- Community Infrastructure Levy;
- The planning application process;
- The Council's role as Local Highway Authority; and
- The Council's role as Lead Local Flood Authority.

## Conserving and Enhancing our Heritage

### Strategic Objectives

Conserve and enhance the borough's historic environment, distinctive character and heritage for future generations to enjoy.

Ensure that residents are able to meet their day to day needs within a 15 minute walk, wheel or cycle of their home. Conserve and enhance the borough's network of culturally diverse, inclusive and sustainable neighbourhoods and celebrate their locally distinctive character and heritage.

**16.1** Waltham Forest has a rich multi-layered historic environment that contributes significantly to the distinctive and unique identity of the borough. This adds to the quality of life and well-being of all who study, live, work or visit the borough.



Figure 16.1 Heritage in Waltham Forest

**16.2** Whether in the form of individual listed buildings, conservation areas or other heritage assets such as below ground archaeology, protecting and enhancing our heritage is an important role the Council plays on behalf of the community in fulfilling the government's key planning principles, as set out in the National Planning Policy Framework (NPPF).

**16.3** The Council has a positive strategy for the conservation, enhancement and enjoyment of the historic environment that includes:

- Guidance and advice for owners and developers in relation to how Waltham Forest's historic environment assets should be conserved;
- Identifying and managing heritage assets at risk through neglect, decay or other threats, and seeking their return to appropriate and sustainable use;
- A continuing programme of producing and reviewing Conservation Area appraisals and management plans, and periodically updating the Archaeological Priority Areas;
- Continuing to work closely with heritage organisations such as Historic England, national and local amenity societies and other relevant stakeholders in considering proposals affecting heritage assets within the borough, and in promoting and raising awareness of local heritage matters generally; and
- Support for local communities in promoting, valuing and identifying other locally significant heritage assets within the borough, including producing a list of Local Heritage Assets.

**16.4** The conservation and enhancement of heritage assets is a key consideration in assessing development proposals, and all development will be required to protect the significance, character, appearance and setting of heritage assets, whether designated or non-designated, so that they are sustained for the benefit of existing and future generations. In the context of Waltham Forest this is particularly important when considering non designated heritage assets, due to the limited number of designated heritage assets within the borough.

## Policy 70

### Designated Heritage Assets

Designated heritage assets will be conserved, and where possible enhanced, by:

- A. Applying a strong presumption in favour of retention and enhancement to ensure the borough's history, identity and sense of place is protected and maintained for existing and future generations;
- B. Requiring a heritage statement to accompany all applications that affect designated heritage assets, clearly explaining the significance of the asset, how it will be affected by the proposal, and providing clear and convincing justification for any change;
- C. Giving great weight in the planning process to any harm to designated heritage assets and their settings, irrespective of whether this would amount to substantial harm, total loss or less than substantial harm - all of which will require clear and convincing justification;
- D. Not permitting development proposals that would lead to either substantial harm to, or the total loss of, designated heritage assets or their settings unless it can be demonstrated that the proposal achieves substantial public benefits that outweigh that harm or loss, or all of the following apply:
  - i. The nature of the heritage asset prevents all reasonable uses of the site;

- ii. No viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;
  - iii. Conservation by grant funding or some form of charitable or public ownership is demonstrably not possible; and
  - iv. The harm or loss is outweighed by the benefit of bringing the site back into use;
- E. Not permitting development proposals that would lead to less than substantial harm to the significance of a designated heritage asset or its setting unless the public benefit of the proposal, including securing the optimum viable use of the site, outweigh the harm caused;
- F. In cases where loss of a designated heritage asset may be justified in accordance with the above and national policy, only granting planning consent when acceptable plans for redevelopment have been agreed, and where all reasonable steps have been taken to ensure the new development will proceed after the loss has occurred;
- G. Supporting proposals that sensitively and creatively bring designated heritage assets and/or their settings back into use whilst still maintaining their significance;
- H. Where a non-designated asset of archaeological interest is identified via desk-based or field-based assessment work, and is assessed to be of demonstrably equal significance to a scheduled monument, treating it as a designated asset, subject to the conditions of this policy; and
- I. Where a developer contribution is sought toward designated heritage assets, notably in cases of enabling development or conservation of archaeological assets, referring to the Developer Contributions Supplementary Planning Document (SPD).

**16.5** Designated heritage assets include: World Heritage Sites, Scheduled Monuments, listed buildings, registered parks and gardens, registered battlefields, conservation areas designated under the relevant legislation, and non-designated assets of archaeological interest that hold, or potentially hold, evidence of past human activity worthy of expert investigation at some point whether inside or outside of Archaeological Priority Areas.

**16.6** Non-designated heritage assets include: Locally Listed Heritage Assets; Parks and Gardens of Local Historic Interest; and Areas of Special Character.



**16.7** National planning policy places a strong emphasis on the conservation of heritage assets appropriate to their significance. The greater the significance of a Designated Heritage Asset, the greater the presumption in favour of its conservation. This is irrespective of the degree of any potential harm that may be caused by a development proposal.

**16.8** The Council will look favourably upon proposals that creatively and sensitively reuse and adapt heritage assets, especially those currently not in use or which are on the Heritage At Risk Register. The Council recognises that in many cases the best use of a heritage asset will be the original use for which it was designed, and will support retention and reintroduction of these uses where possible.

**16.9** Not all of Waltham Forest's heritage is designated, and it is therefore important to recognise the value of our non-designated historic environment in planning for the future. Many buildings are of significance to the local environment, even though they may not be protected by law. Therefore, a balanced judgement considering the scale of harm and the significance of the asset in question is required for development proposals affecting non-designated heritage assets.




## The Setting of Heritage Assets

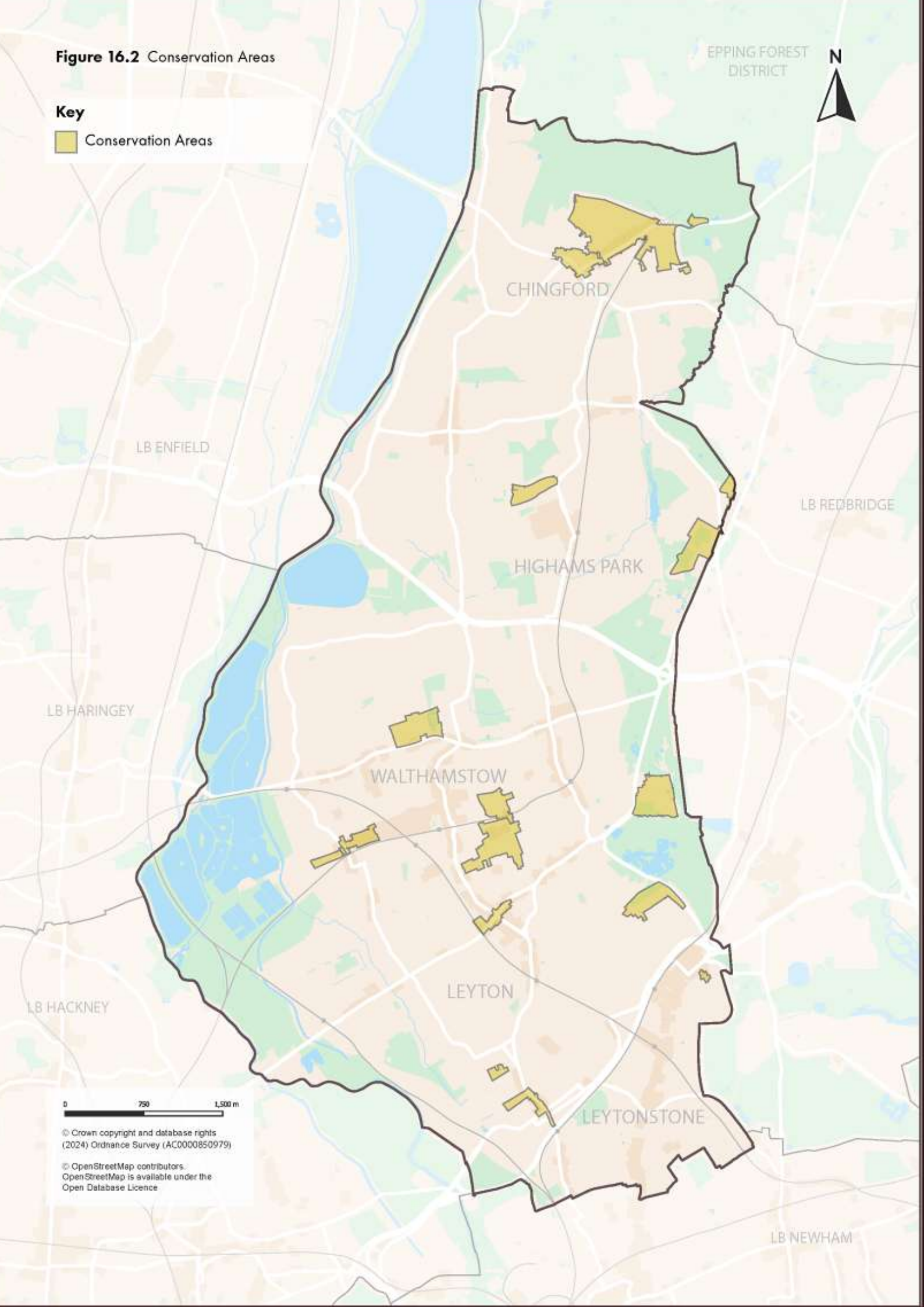
**16.10** In addition to the need to identify and assess the particular significance of any heritage asset that may be affected by a proposal, it is also essential to consider the impact of proposed development on the setting of such assets. The significance of a heritage asset derives not only from its physical presence and historic fabric but also from its setting – the surroundings in which it is experienced.

**16.11** Historic England's [Setting of Heritage Assets](#) provides clear guidance on setting, which the Council will take into account when considering development proposals and which applicants are strongly advised to refer to in bringing forward relevant schemes.

**Figure 16.2** Conservation Areas

**Key**

 Conservation Areas



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## Policy 71

### Listed Buildings

- A. All proposals for listed buildings and their settings will be expected to conserve the building, its setting and any features of special architectural or historic interest and, where possible, enhance the significance of the asset.
- B. Reinstatement and repair of historic building elements (e.g. roof coverings, rainwater and soil goods, windows and doors) should be carried out using traditional, historic or original material, employing specialist advice and craftsmanship where appropriate.
- C. Extensions to listed buildings and new development within the setting of listed buildings should:
  - i. Respect the listed building in terms of location, floor area, height, massing and scale;
  - ii. Respect the listed building in terms of design, materials and detailing;
  - iii. Respect the unity and/or historic relationship of groups of buildings (e.g. terraces) and the settings of other heritage assets nearby; and
  - iv. Respect the historic character and the extent of the curtilage of the listed building in relation to the amount of garden or other open space provided or retained.
- D. Proposals for the change of use of a listed building will be supported where it can be demonstrated that the proposed use, including any required works to the building, would have a neutral or positive effect on the significance of the heritage asset. Where a proposed change of use would lead to less than substantial harm to significance, this should be weighed against any public benefits that might outweigh the harm, and where appropriate secure the optimum viable use of the building (see Policy 70 'Designated Heritage Assets'). Proposals that sensitively reuse listed buildings where the original use has ceased and is no longer viable, and conserve their heritage significance, will be looked upon favourably.
- E. Proposals leading to substantial harm to listed buildings will only be permitted in exceptional circumstances, as set out in Policy 70 'Designated Heritage Assets' Part D. A listed building having fallen into disrepair, or having become partially or wholly derelict will not in itself be sufficient reason to permit its demolition or any substantial harm to its special interest or significance.
- F. The Council will continue to work with Historic England in identifying listed buildings and structures that merit inclusion on the Heritage at Risk Register. Where such buildings are identified, the Council will work proactively with owners and other bodies to facilitate their successful conservation and reuse, consistent with their heritage significance and special interest.

**16.12** The Secretary of State compiles lists for all local authorities of buildings in their areas considered to merit statutory protection because of their special architectural/historic interest. All statutory listed buildings are of national significance and the statutory list for Waltham Forest is published on Historic England's website (Section 1 of the Planning (Listed Buildings and Conservation Areas) Act, 1990).

**16.13** The borough has a diverse range of listed buildings, from the late medieval Walnut Tree House in Leyton, to the civic grandeur of Walthamstow Town Hall, to the distinctive Moorish design of the former Granada Cinema. However, in numerical terms, listed buildings represent a finite asset and for that reason their loss/substantial demolition will not be permitted unless the Council is satisfied that every possible alternative approach for restoration, conversion or re-use has been thoroughly explored and found to be impracticable.



**16.14** Section 7 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that prior consent must be obtained from the local authority before any demolition (in whole or in part), alteration or extension works go ahead which would affect the character of a building of special architectural or historic interest. It is a criminal offence to carry out any such works without consent.

**16.15** The Council supports Historic England in maintaining a Heritage At Risk Register, highlighting statutorily listed buildings that are assessed to be at risk for a variety of reasons, be that vacancy, deterioration of fabric, or poor structural condition.

**16.16** The purpose of the 'At Risk' register is to monitor and provide the basis for solutions to the issues these buildings face, and the Council will therefore work with stakeholders to facilitate the successful refurbishment and repair of these assets, with the long term objective of putting them back into viable and sustainable uses.

**16.17** Appropriate temporary uses will also be considered that could prevent further decay of the asset, provide improved security and/or allow an increased prospect of sustainable re-use. The Council may also be able to offer assistance and advice on external grant-giving bodies.

**16.18** The most viable use for a heritage asset may not be the use for which it was originally intended, and proposals that bring 'At Risk' buildings back into sustainable uses that maintain and enhance the buildings significance will be looked upon favourably.

## Policy 72

### Conservation Areas

In order to preserve or enhance the borough's conservation areas, including their respective significance, character or appearance:

- A. All proposals within conservation areas will be expected to pay special attention to the desirability of preserving or enhancing the character or appearance of the area. Any harm to the significance of a conservation area, including from development within its setting, will require clear and convincing justification;
- B. Where appropriate, Article 4 Directions will be used to protect local amenity so as to preserve, and where possible, enhance the character of the borough's conservation areas;
- C. Any tree which contributes to the character of a conservation area will be protected, as per Policy 80 'Trees';
- D. The Council will identify and designate new conservation areas in the borough where appropriate, with public consultation; and
- E. The Council will appraise and reassess the borough's existing conservation areas, including periodic review character appraisals and management plan documents.

**16.19** Complementary to its aim of improving the environment of the borough as a whole, the Council seeks to conserve, and, wherever possible, enhance those buildings and areas which are of special value. This can be achieved by designating conservation areas, recognising special character and historic significance of wider areas beyond that of individual buildings or structures. To date, fifteen such areas have been designated in the borough.

**16.20** The borough's conservation areas vary in character, and include the well-preserved medieval heart of Walthamstow Village, the cohesiveness of the Warner housing developments in Lloyd Park and Leucha Road, and the town centres of Leyton and Chingford, amongst others.

**16.21** Proposed developments will be expected to pay close attention to the character of each conservation area, taking into account typical features and styles of existing development, maintaining features of interest, and better revealing features that may have been hidden over time or which require reinstating.

**16.22** Proposals that affect individual properties within conservation areas will be assessed on their impact on the individual building, and on their impact on the character of the conservation area as a whole.

**16.23** The Council currently has Article 4 Directions in place for nine of its fifteen conservation areas. The use of Article 4 Directions is in recognition of the harm that can often be caused under Permitted Development to character and appearance by inappropriate changes such as the replacement of traditional timber windows and doors with modern plastic alternatives, the replacement of natural roofing materials such as clay and slate tiles with concrete and plastic tiles, poorly located satellite dishes, the removal of original chimney stacks and changes to front gardens that result in hardstanding for vehicles.

**16.24** The Council will therefore use Article 4 Directions to protect the local amenity of conservation areas by requiring planning applications be submitted for certain works. When considering changes to properties within a conservation area, applicants are advised to contact the Council's Conservation Officer for further specialist advice.

## Policy 73

### Archaeological Assets and Archaeological Priority Areas

Proposals which affect Archaeological Assets and Archaeological Priority Areas will be supported where:

- A. They provide details of measures that will protect and, where appropriate, better reveal remains of archaeological importance by ensuring acceptable methods are used, proportionate to the significance of the asset. This will include preserving the asset and its setting, including physical preservation in situ where appropriate;
- B. Desk-based assessments are provided for proposals within designated Tier 1 Archaeological Priority Areas and for applications for major development in Tier 2 Archaeological Priority Areas to evaluate impacts on any below ground archaeology. Further investigation works, including trial pits, may also be required;

- C. The remains are appropriately recorded, assessed, analysed, disseminated and the archive deposited in cases where loss of the asset is justified in accordance with national policy; and
- D. The developer undertakes investigations of non-designated heritage assets of archaeological interest that fall either inside or outside of the identified and reviewed Archaeological Priority Areas that hold or potentially hold evidence of past human activity, and the Council will draw on appropriate advice from archaeological experts to assess the results.

**16.25** The history of Waltham Forest dates from the time of the earliest Bronze Age settlements in the Forest. Archaeology is an important way in which greater knowledge about the history of the borough can be discovered. The evaluation and assessment of archaeological remains should take place before making a planning application. However, it is recognised that the opportunity to carry out archaeological investigations often only arises when construction work begins.

**16.26** The Greater London Archaeology Advisory Service (GLAAS), part of Historic England, provides archaeological advice to local authorities, developers and their agents, and local people. GLAAS maintain the Greater London Historic Environment Record (formerly the Greater London Sites and Monuments Record) and have defined 21 Archaeological Priority Areas (APAs) in the borough for their particular archaeological interest. The Council is committed to consulting GLAAS on all relevant applications and schemes that will impact non-designated assets of archaeological interest and sites that fall within Archaeological Priority Areas under the criteria set out below.

**16.27** The expert advice of GLAAS will be sought in relation to:

- All major planning applications over 0.5 hectares whether in an APA or not;
- All Environmental Impact Assessment Scoping requests and Environmental Statements;
- Any planning application supported by an archaeological desk-based assessment;
- Minor planning applications in any APA (tiers 1 to 3);
- Any domestic basement applications in APA tiers 1 and 2 only;
- Householder and equivalent-scale very minor applications in APA tier 1 only;
- Proposed substantial demolition or major alterations to historic buildings;
- Submission of details in relation to archaeological conditions; and
- Appeals on applications for which an archaeological issue has previously been identified.

## Policy 74

### Non-Designated Heritage Assets

- A. Non-designated heritage assets (including Locally Listed Heritage Assets - see Policy 75 'Locally Listed Heritage Assets') and their settings will be protected and conserved

appropriate to their significance, with a strong presumption in favour of their retention, and where possible their enhancement; and

- B. Substantial harm to and complete loss of non-designated heritage assets will only be supported in exceptional circumstances, and will require clear and convincing justification and evidence as to why the non-designated heritage asset cannot be retained or repurposed.

**16.28** Non-designated heritage assets may be buildings, other structures, designed landscapes of parks and gardens, assets of archaeological interest or features and historic areas not designated in legislation. As the borough has fewer designated heritage assets than other local authorities, protection of non-designated assets will be given significant consideration when assessing proposed development.



## Policy 75

### Locally Listed Heritage Assets

- A. The Council will seek to protect and retain locally listed heritage assets and where appropriate their settings, recognising their archaeological, architectural, artistic and historic interest that makes them significant to the borough;
- B. Substantial harm to and complete loss of locally listed heritage assets will only be supported in exceptional circumstances and will require clear and convincing justification and evidence as to why the locally listed heritage asset cannot be retained or repurposed;
- C. Alterations or extensions to locally listed heritage assets will be expected to achieve a high standard of design, paying close attention to the significance of the asset and its setting; and
- D. All parks and landscaped public gardens will be retained, and development proposals will only be supported where they are ancillary to the open space use and respect its inherent character. In assessing development proposals to parks and landscaped public gardens a balanced judgement will be taken, having regard to the scale of any harm or loss and the significance of the asset.

**16.29** The Council maintains a list of locally listed heritage assets of architectural and historic interest separate to those on the Secretary of State's statutory list for the borough. The list will be reviewed and updated periodically. These are not subject to additional statutory controls, but the Council will encourage their conservation through its normal town planning controls with a firm preference for their retention and enhancement as part of development.

**16.30** Due to the limited number of statutory listed buildings within the borough, locally listed heritage assets are considered to take on a greater significance than might be found elsewhere. As a result, the Council will be preparing a revised and updated Local List document and supporting SPD to provide greater clarity on conserving, enhancing and managing locally listed heritage assets.

## Policy 76

### Highams Area of Special Character

The Highams Area of Special Character has local architectural and historic significance that merits consideration and, where planning permission is required, appropriate protection in the planning process.

- A. Development proposals will be expected to pay close attention to the area's defined character, including making use of appropriate materials; and
- B. Applicants should refer to the Article 4 Direction for the Highams Area of Special Character when preparing a planning application within the estate.

**16.31** The Highams Area of Special Character was designated by the Council in 1988 in recognition of the area's cohesive architectural and landscape quality. Its interest lies in its historical relationship with the Warner family, who developed a number of residential areas within the borough from the late nineteenth century onwards, with this being was one their last major projects to be completed.

**16.32** Built on a more suburban scale compared to the Warner family's other developments, the Highams Estate adopted an Arts and Crafts idiom with a number of 'standard designs' used for the properties. Key features include use of brick at ground floor and roughcast render at first floor, timber panelled front doors, red and brown clay roof tiles, and planted front gardens.

**16.33** Although not deemed to be of sufficient interest to be merited with conservation area designation and not being a statutory consideration within the planning process, where applications are submitted within the Highams Estate, the Council will seek to ensure the area's special interest is protected, including those material qualities outlined above and in the Highams Area of Special Character Information Leaflet, available on the Council's website.

**16.34** In addition, the Council has made an Article 4 Direction to ensure elements of the character of the estate are preserved and enhanced through the planning process, requiring planning permission be applied for property extensions and changes to roof profiles.

## Protecting and Enhancing the Environment

### Strategic Objectives

Develop a multi-functional network of green and blue infrastructure to deliver benefits for all, including, where appropriate, increased public access.

Protect, restore and enhance the borough's natural environment to sustain biodiversity, habitats and species of conservation importance.

Work with partners to protect and enhance the adjoining areas of regional, national and international natural importance in Epping Forest and the Lee Valley Regional Park.

**17.1** The borough has an extensive resource of accessible green and blue infrastructure which includes ponds, parks, wetlands, reservoirs, rivers, ditches and streams, forest, lakes and open spaces. Waltham Forest is host to six areas of Metropolitan Open Land, three Sites of Metropolitan Importance to Nature Conservation, 10 Sites of Borough Importance to Nature Conservation, 14 Sites of Local Importance to Nature Conservation, 4 Sites of Special Scientific Interest, 1 Local Nature Reserve, Epping Forest and the Lee Valley Regional Park. The Lee Valley Special Protection Area (SPA) and RAMSAR site (21) lies along the western edge of the Borough and the Epping Forest Special Area of Conservation (SAC) lies to the east.

**17.2** From Epping Forest at the north and eastern sides of the borough and the Walthamstow Wetlands and Lee Valley Regional Park to the south and the west, Waltham Forest is one of the greenest London boroughs. The borough's natural green spaces in Epping Forest and the Lee Valley Regional Park are augmented by parks. The Council's Open Space Needs Assessment (2018)<sup>(63)</sup> identifies seven Premier Parks in the borough:

- Abbots Park;
- Coronation Gardens;
- Langthorne Park;
- Lloyd & Aveling Park;
- Memorial Park;
- Ridgeway Park; and
- Leyton Jubilee Park (which has recently been expanded by the new sports facilities and parkland at Ive Farm).

**17.3** The Premier Parks are supplemented by a network of smaller, less formally managed parks throughout the borough, such as Sidmouth Park in Leyton, which provide opportunities for activities such as dog walking and play for children. Further details of these parks can be found on the Policies Map.

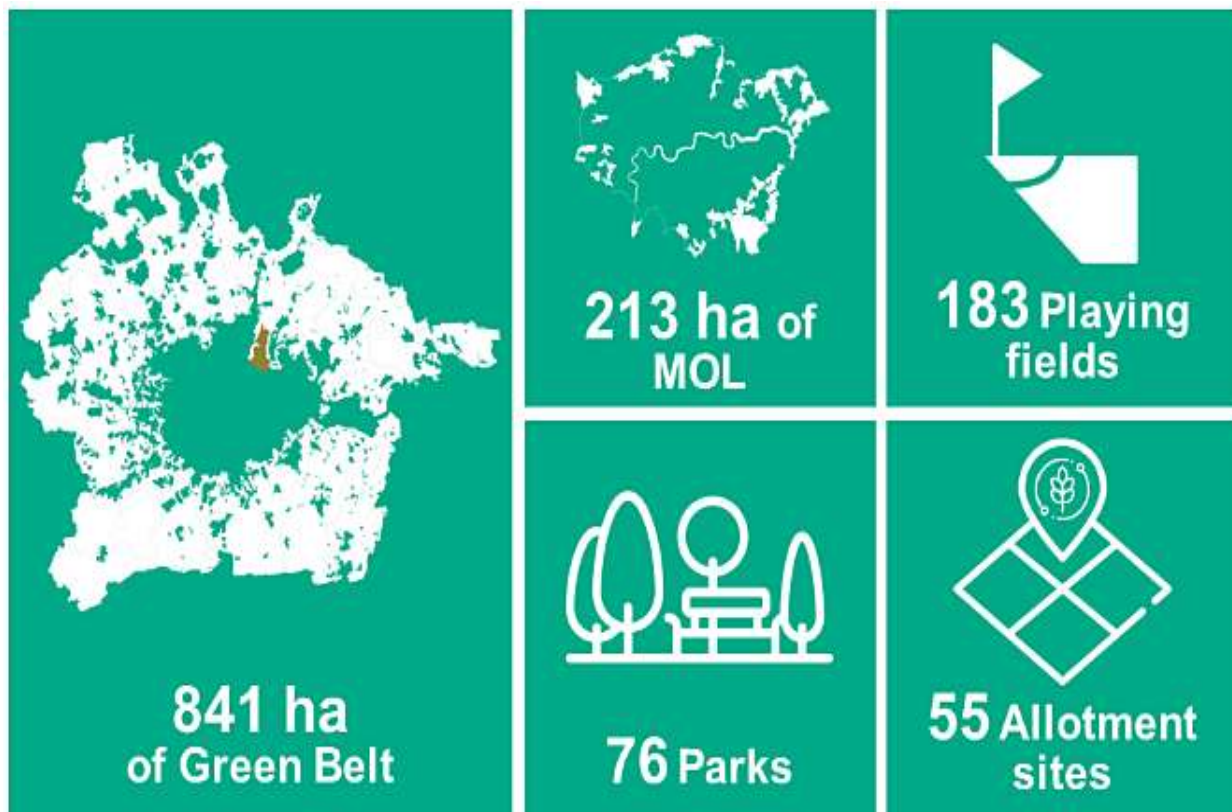


Figure 17.1 Green space in Waltham Forest

**17.4** The borough also includes blue spaces and water bodies in the form of main rivers (including the River Ching, Dagenham Brook, the Lee, the Lee Navigation and the Lee Flood Relief Channel) in addition to reservoirs in Chingford and Walthamstow and the Waterworks attraction on Lea Bridge Road. These are connected to leisure and boating activities in the wider Lee Valley Regional Park on the River Lee and its Navigation.

**17.5** The land area of Waltham Forest covers approximately 3,881 hectares. Cumulatively Green Belt and MOL account for approximately 27% of the borough's land area. The NPPF (paragraphs 137 and 138) sets out the important functions that the Green Belt has in assisting urban regeneration by encouraging the recycling of derelict and other urban land by preventing encroachment and urban sprawl through inappropriate development. Whilst MOL has a similar degree of protection as strategic open land, its protection derives from the London Plan and its purpose is to provide open breaks in the urban area in order to maintain the structure of London.

**17.6** This Plan seeks to maximise the valuable benefits of the borough's green and blue spaces as places which:

- Provide opportunities for healthy recreation;
- Are richly biodiverse environments and places to visit and experience nature;
- Create the setting for high quality, cultural, 15 Minute Neighbourhoods, linking development and greenspace; and
- Increase the resilience of the borough's built environment to climate change and flooding.

**17.7** Collectively, the borough's green and blue spaces are vital assets within the urban fabric which further the physical and mental health and well-being of the borough's residents, and which contribute significantly to the character of the borough. As such they are to be protected and enhanced by the policies in this Plan.

## Policy 77

### Green Infrastructure and the Natural Environment

- A. Proposals will only be supported where they preserve and enhance green and blue infrastructure and access to open spaces by:
- i. Protecting Green Belt, Metropolitan Open Land (MOL) and other open space of designated importance from inappropriate development and improving active access for walking and cycling where appropriate;
  - ii. Delivering development and regeneration activity principally through the use of brownfield land and buildings; and
  - iii. Delivering the principles, strategies, investment and interventions set out in the Green and Blue Spaces Supplementary Planning Document (SPD).
- B. In the event that development proposals are allowed in very special circumstances in Green Belt or MOL within the meaning of national policy and the London Plan, they should:
- i. Implement an exemplar standard of design in accordance with the principles set out in 'Creating High Quality Places';
  - ii. Complement and improve the quality of existing open space uses and landscaping;
  - iii. Enhance the green and blue infrastructure network through better connectivity and the creation of new open spaces, whilst also conserving its natural and historic value;
  - iv. Establish and/or extend the borough's Greenways and Green Corridors, and provide landscaping along transport routes where possible; and
  - v. Design new development adjacent to existing Green Chains and Green Corridors in a way that contributes positively towards the green infrastructure network.
- C. All major development must be designed to maximise opportunities for urban greening (as defined within London Plan Policy G5 'Urban greening') through appropriate landscaping schemes and planting of trees.
- D. All development proposals should enhance the value of existing open spaces by:
- i. Responding to the character and significance of the space;
  - ii. Optimising physical and visual access between development and open space;
  - iii. Increasing biodiversity value.

- E. New high quality and usable open spaces and/or landscape infrastructure must be provided in major new developments. Where new development cannot contribute to usable open space provision or landscaping on-site, or provision is deemed insufficient to the scale and nature of the development, financial contributions will be sought for the ongoing maintenance of public open space.
- F. Proposals for new areas of open space and landscape provision must be accompanied by a maintenance plan for adopted and non-adopted areas as a requirement of planning permission to ensure their long-term successful establishment.
- G. Any improvements to access routes or green corridors should not result in any adverse effects on the integrity of the Epping Forest Special Area of Conservation (see Policy 81 'Epping Forest and the Epping Forest Special Area of Conservation').

**17.8** Green infrastructure is defined in the NPPF as: "A network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity". Green infrastructure is complemented by blue infrastructure which comprises the borough's large scale waterbodies such as the reservoirs and the Walthamstow Wetlands.

**17.9** The delivery of green and blue infrastructure is a key component of sustainable development, and it is a thread which connects the policies contained in this chapter underpinned by the vision set out in the Council's Green and Blue Infrastructure Strategy (2020): "The network of open spaces, green corridors, habitats, rivers corridors, water and urban greening features (The Green and Blue Infrastructure Network) will be well connected, conserved and resilient to the pressures of a changing climate and growing population. Green and blue infrastructure within Waltham Forest will be considered equally alongside other forms of 'grey' or 'hard' infrastructure as integral to ensuring sustainable growth and a good quality of life for local communities".<sup>(64)</sup>

**17.10** Delivery of green infrastructure may involve measures such as the planned retention and provision of high quality trees and the use of natural and green landscaping in new development through to the delivery of park and open space improvements to maximise the potential for residents to meet and interact. As such, it will deliver benefits for all in the form of accessibility and connectivity across the borough. Further guidance will be provided in the Green and Blue Spaces Supplementary Planning Document (SPD).

**17.11** Integral to this is Green Belt and Metropolitan Open Land (MOL). Chapter 13 of the NPPF sets out the fundamental aims of Green Belt policy and the framework for its protection from urban sprawl. In a London context, these apply equally to MOL which provides strategic open land within the urban area. In addition to Sites of Importance to Nature Conservation (SINC), Local Green Space (LGS), and statutory sites (Sites of Special Scientific Interest (SSSI), Special Protection Areas (SPA) and Special Areas of Conservation (SAC)), Green Belt and MOL provide some of Waltham Forest's most important natural resources. Together these make a valuable contribution to the London-wide green infrastructure network.

64 [Waltham Forest Green and Blue Infrastructure Strategy \(2020\)](#)

**17.12** The projected growth in population and housing demand increases the importance of improving the provision of accessible open spaces, especially in areas of deficiency. Accordingly, all major development will need to submit an ecology report which will use the Mayor's Urban Greening Factor (UGF) to demonstrate that the development aims to exceed the Mayor of London's minimum UGF score of 0.4 for residential development and 0.3 for predominately commercial development (excluding B2 and B8 uses).

**17.13** Full justification will be required where sufficient open space or landscape infrastructure cannot be provided on-site. In these circumstances, the Council may require financial contributions in order to enhance or upgrade the provision of local open space(s) in the vicinity of the development, in accordance with the Council's Developer Contributions Supplementary Planning Document (SPD).

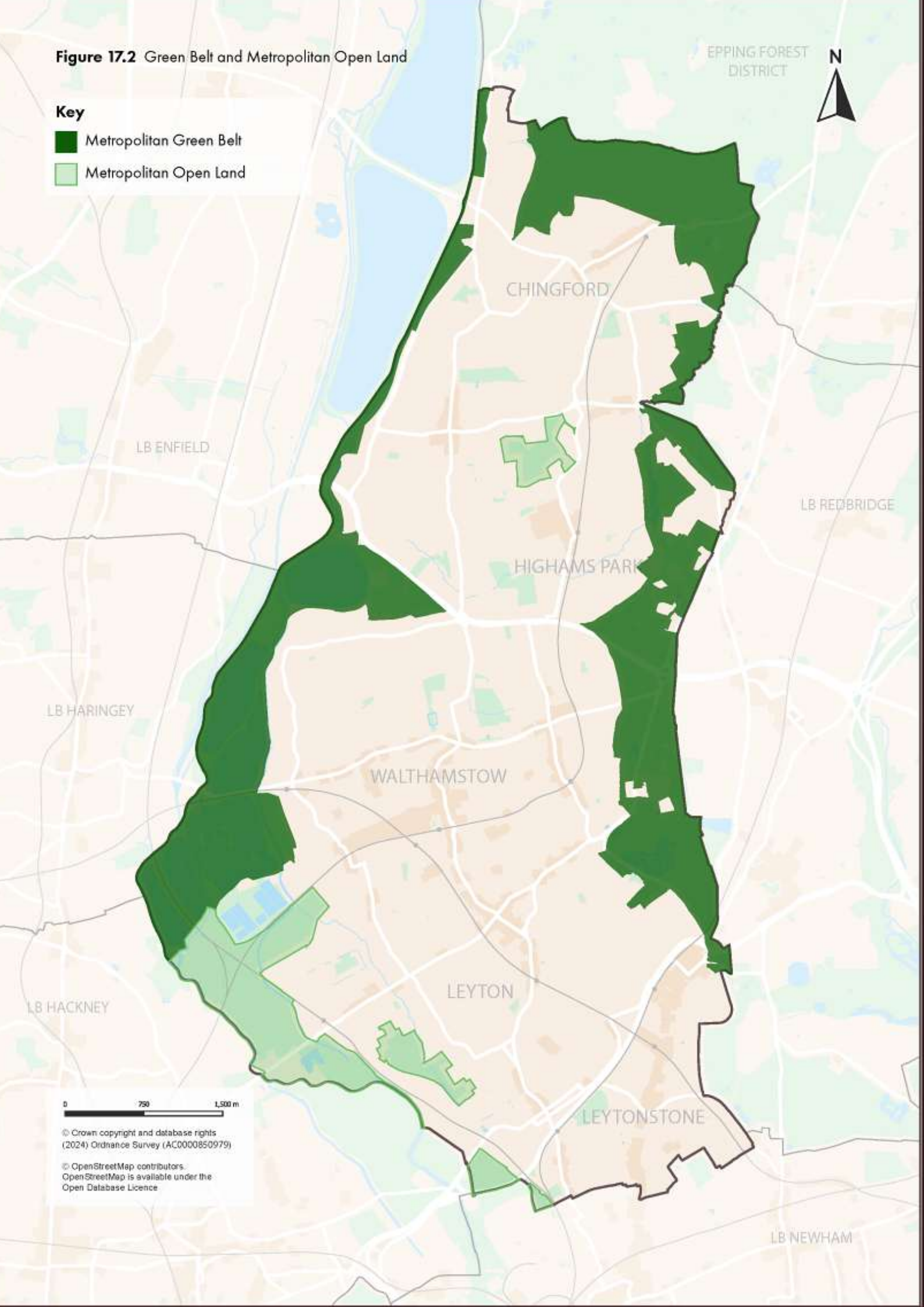
**17.14** Effective maintenance is essential where open spaces and landscape infrastructure are provided, and development which benefits from proximity to public open space should contribute to its ongoing maintenance. Where new open space is provided on-site as part of new developments, its design, integration with existing development and ongoing maintenance should be carefully considered at an early stage to ensure maximum benefits are delivered and unnecessary delays to provision are avoided.

**17.15** Green corridors and networks of green islands deliver benefits in supporting biodiversity and mitigating against the impacts of climate change and pollution. Richness and diversity in bird and bat populations in urban areas is strongly affected by tree numbers and distribution. It is therefore vital to protect and strengthen the network of Green Corridors in the borough and to support measures to improve the links to Green Corridors in neighbouring boroughs and districts. This can be done through landscaping and the careful siting and design of buildings. Establishing corridors and links with suitable native trees would improve the environment for local people significantly and help to 'buffer' and support Epping Forest's biodiversity, thus adding to the natural capital assets of London.

**Figure 17.2** Green Belt and Metropolitan Open Land

**Key**

- Metropolitan Green Belt
- Metropolitan Open Land



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**Policy 78****Parks, Open Spaces and Recreation**

Existing parks and open spaces will be preserved and enhanced, and access for leisure, sporting activity and recreation across the borough will be improved by:

- A. Ensuring adequate provision, protection, enhancement and quality of play and recreational spaces, indoor and outdoor sports facilities and parks for all sections and age groups of the community;
- B. Preserving the existing level of provision of playing pitches, in line with any future review, in accordance with the Council's Playing Pitch Strategy;<sup>(65)</sup>
- C. Ensuring that all parks within the borough will be enhanced and retained in accordance with the Council's 'Parks and Open Spaces Strategy' and Green and Blue Spaces Supplementary Planning Document (SPD). Development proposals in parks and open spaces will only be acceptable where they are ancillary to the open space use and its inherent character. In addition and where relevant, proposals must demonstrate that they would have no adverse impacts to the setting or visual appearance of the park or open space, its heritage significance and/or its ecological value;
- D. Expecting residential and mixed use proposals to contribute to the provision of high quality and accessible exercise, play and recreational facilities either on- or off-site, based on child yields in accordance with the Mayor of London's current standards;
- E. Refusing planning permission for schemes which would result in a net loss of open space or sports facilities and requiring proposals for new development to provide new, and/or contribute to enhancing the quality of existing open spaces, indoor/outdoor sports facilities, playing pitches and/or their associated ancillary facilities and access, taking account of priorities set out in the Council's Playing Pitch Strategy<sup>(66)</sup> where appropriate;
- F. Requiring the submission of management and maintenance plans as a requirement of planning permission for all new sports and recreation facilities;
- G. Encouraging opportunities to provide ancillary facilities to enhance the attractiveness and experience of using open spaces, such as cafes, toilets and baby changing facilities; and
- H. Where sports facilities or multi-functional spaces are provided in school facilities, the Council will seek to secure community benefits through sharing schemes and joint user agreements in alignment with Policy 46 'Social and Community Infrastructure'.

Further guidance will be set out in the Green and Blue Spaces Supplementary Planning Document (SPD).

**17.16** To promote healthy communities, open space provision must be high quality and usable in order to provide space for leisure and relaxation. This is really important in areas where there are identified deficiencies in access to open spaces. Research has shown that

65 [Waltham Forest Playing Pitch Strategy \(2020\)](#)

66 [Waltham Forest Playing Pitch Strategy \(2020\)](#)

parks are valuable for social interaction and people with access to quality open space are often physically and psychologically healthier. In addition to the inherent benefits of open space, development can contribute to the provision of a variety of sports, leisure and physical activity facilities for residents to address health and wellbeing priorities and deficiencies in the borough.

Open Space Typology	Sites	Total Hectares
Parks and Gardens	33	83.8 ha
Natural and Semi-natural Green Spaces (Includes 19 sites which are part of the Lee Valley Regional Park and 6 which are part of Epping Forest)	40	800.8ha
Green Corridors	5	2.9 ha
Outdoor Sports Facilities	50	234.7ha
Amenity Green Spaces	22	5.9 ha
Provision for Children and Young People	21	2.1 ha
Allotments, Community Gardens & Urban Farms (Brookfield Allotments is shown as 2 sites where it crosses a ward boundary)	38	51.4 ha
Cemeteries, disused Churchyards & other Burial Grounds	10	36.5 ha
Civic and Market Squares and other hard surfaced areas designed for pedestrians	1	0.46 ha
<b>Total</b>	<b>220</b>	<b>1218.56ha</b>

**Table 17.1 Types of open space in Waltham Forest**

**17.17** Open spaces are also important in addressing climate change and contributing to air quality improvements in heavily urbanised areas, and the numerous benefits that open spaces provide to communities must be protected from increased urbanisation. Waltham Forest is a green borough which includes parks and gardens of Local Historic Interest. Proposals within such spaces will be expected to be ancillary to the open space use, respect its setting and visual appearance through sensitive design and to contribute to the future maintenance of such spaces.

**17.18** Access to high quality sports facilities, both outdoor playing fields and pitches, and indoor sports halls and swimming pools are important in developing and maintaining healthy communities. The Playing Pitch Strategy<sup>(67)</sup> acknowledging the projected rise in the borough's population over the Plan Period, recommends improvements to outdoor sports facilities such as to pitch quality, security, floodlighting and better changing facilities. However, the borough faces a shortfall in built facilities such as swimming pools and sports halls as acknowledged by Sport England studies in the borough.<sup>(68)</sup>



**17.19** In line with London Plan Policy S5 'Sports and recreation facilities', the co-location of sports facilities particularly within new and existing schools, colleges, commercial schemes and community centres should be considered positively in planning applications for mixed use development. This will help ensure the right mix of facilities in the right places to stimulate and to meet sporting demand and increase participation.

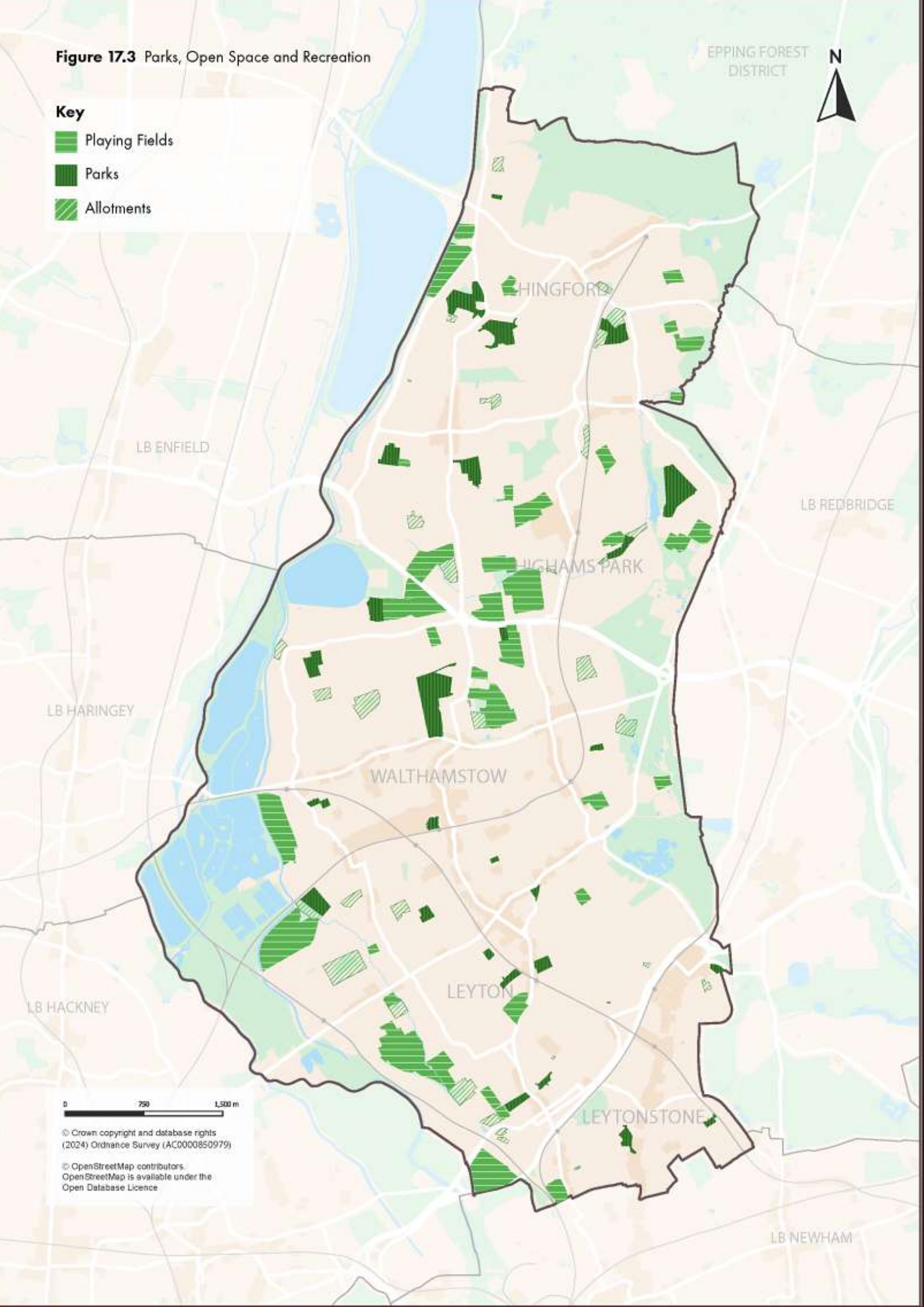
67 [Waltham Forest Playing Pitch Strategy \(2020\)](#)

68 (Strategic Assessment of Need for Swimming Pools provision in Waltham Forest Facilities Planning Model. Sport England. July 2019; Strategic Assessment of Need for Sports Halls provision in Waltham Forest Facility Planning Model Sport England. July 2019)

**Figure 17.3** Parks, Open Space and Recreation

**Key**

- Playing Fields
- Parks
- Allotments



0 750 1,500 m

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**Policy 79****Biodiversity and Geodiversity**

Proposals should seek to protect and enhance biodiversity and geodiversity resources in the borough and achieve biodiversity net gain by:

- A. Maximising opportunities to create new, or make improvements to existing natural environments, nature conservation areas, habitats or biodiversity features and links into the wider green infrastructure network, and contributing to the Local Nature Recovery Strategy;
- B. Undertaking a biodiversity survey of the site and submitting it in support of all major planning applications;
- C. Avoiding and minimising the impacts of development on biodiversity in accordance with the London Plan mitigation hierarchy;
- D. Demonstrating a minimum 10% biodiversity net gain using the Defra Biodiversity Metric 2.0 (or subsequent version), even where development proposals do not result in biodiversity loss;
- E. Preparing a long-term monitoring and maintenance plan for biodiversity and habitat proposals for a minimum period of 30 years, including both on- and off-site measures;
- F. Demonstrating that any off-site measures proposed seek to enhance locally important priorities with reference to the Green and Blue Spaces Supplementary Planning Document (SPD);
- G. Providing measures support species and habitats through the use of landscaping on or adjacent to buildings. This may involve the inclusion of living roofs and walls and other measures (such as bird boxes) which provide space for species to nest, roost or hibernate;
- H. Temporarily protecting vacant or derelict land awaiting redevelopment that has some value for nature conservation;
- I. Improving public access to areas of nature conservation (where appropriate), especially in areas of deficiency.
- J. Submitting an arboricultural report at the planning application stage where a development proposal will impact on trees (see Policy 80 'Trees');
- K. Protecting and enhancing the nature conservation or geological interest of nationally important wildlife sites, as shown on the Policies Map. Development proposals will not normally be granted planning permission where they pose adverse direct or indirect effects on the biodiversity or nature conservation value of any land or area within the identified Sites of Special Scientific Interest (SSSI), Sites of Importance to Nature Conservation (SINC), Special Areas of Conservation (SAC), Ramsar sites, or Special Protection Areas (SPA) without appropriate mitigation measures being secured prior to development. These sites are shown on the Policies Map and include but are not limited to the Walthamstow Reservoirs Special Protection Area, Walthamstow Wetlands and Walthamstow Marshes Sites of Special Scientific Interest and Epping Forest SAC;
- L. Retaining, restoring and enhancing features of geological interest on sites designated for their geodiversity value. Development proposals which would cause harm to a site

designated for its geodiversity value will be resisted, unless any damaging impacts can be prevented by appropriate mitigation measures.

**17.20** Waltham Forest has many spaces of biodiversity significance. These require a high level of protection, enhancement and management, and the Council works closely with bodies such as neighbouring authorities, Natural England and the Conservators of Epping Forest in this regard. Because of their overall importance, potential impacts from development proposals have to be rigorously assessed. Ecological assessments must be developed from the earliest stages of the pre-application process and should demonstrate as a minimum how the resource will be retained, enhanced and if necessary restored. This is particularly relevant in order to establish and improve links between areas of nature conservation importance, for instance, between Epping Forest and other wooded areas (e.g. Larks Wood) in the borough. Accordingly development is expected to provide biodiversity benefits in accordance with the principle of net gain set out in the London Plan. Further guidance will be provided in the Green and Blue Spaces and Developer Contributions Supplementary Planning Documents (SPDs).



**17.21** Protected species and priority species of plants and animals are defined in the Waltham Forest, Lee Valley, London and UK Biodiversity Action Plans (BAPS). Sites of importance for their biodiversity value are mainly in Epping Forest and the Lee Valley and these important biodiversity and green infrastructure assets are the foundation for future enhancements to the borough's green infrastructure.

**17.22** The highest level of protection is accorded to Ramsar sites, Special Protection Areas (SPA), Special Areas for Conservation (SAC) and Sites of Special Scientific Interest (SSSI) in the borough. There is a statutory requirement to consult Natural England in cases where development may affect these sites. Sites of Metropolitan, Borough or Local Importance for Nature Conservation and Green Corridors are also priorities for protection, enhancement and management. Consequently, proposals which either alone or in combination are likely to have an adverse impact on any internationally designated wildlife site must be assessed to make sure they satisfy the requirements of the Conservation of Habitats and Species Regulations. These are the Regulations which determine site specific impacts to avoid or mitigate against impacts identified.

**17.23** Where planning permission is granted, planning conditions will ensure that appropriate measures are taken to protect and enhance biodiversity where it may be impacted by development. Measures to recover or relocate habitats should only be a last resort with a preference for the protection and enhancement of existing habitats on site wherever possible. Proposals must accommodate the mitigation hierarchy set out in London Plan Policy G6 'Biodiversity and access to nature', and demonstrate biodiversity net gain using the Natural England Biodiversity Metric (or agreed equivalent) in order to promote wider environmental net gain. The principle of biodiversity net gain requires developers to ensure habitats for wildlife are enhanced and left in a measurably better state than they were pre-development.

The start of the process is a robust assessment of the existing habitat typology and its condition before submitting plans. Employing the Natural England Biodiversity Metric, improvements to biodiversity have to be demonstrated. These improvements may include, for example, the creation of green corridors, increased tree planting, or enhancing existing habitat in open spaces as set out in the Green and Blue Spaces and Developer Contributions Supplementary Planning Documents (SPDs).

**17.24** Policy G5 'Urban greening' of the London Plan promotes the importance of sustainable urban greening as a fundamental element of site and building design proposals. This may include the incorporation of living roofs and walls or spaces for species to nest, roost or hibernate. Examples include the installation of Swift bricks and bird/bat boxes in developments and providing safe routes for hedgehogs between different areas of habitat. This is especially important in order to protect species or mitigate against any unavoidable loss, such as at brownfield sites. As well as providing a valuable habitat, landscaping serves to reduce the urban heat island effect created by climate change. In accordance with the Climate Action Plan, climate change tolerant species and/or native species are preferable in landscaping schemes. For developments of 10 homes and above, developers will be encouraged to exceed the Urban Greening Factor target scores set out in Policy G5 of the London Plan. Further guidance will be provided in the Green and Blue Spaces Supplementary Planning Document (SPD).

**17.25** Geodiversity is concerned with both the natural and human aspects of landscape, but is primarily focused on the rocks, sediments, soils, the landscape topography and the processes that act on the landscape. It is a fundamental natural resource. All raw materials that cannot be grown and all energy that cannot be generated by renewables have to be won from the Earth's crust.

**17.26** Geodiversity is also a key factor in the borough's cultural identity. The geodiversity of any area is an equally important part of its natural heritage as its biodiversity. Conservation, sustainable management, educational use and interpretation of geodiversity are thus as important as biodiversity or archaeology.

**17.27** National policy requires sites with geological conservation interests to be protected. The London Plan stipulates that development proposals should give locally important geological sites a level of protection commensurate with their importance. The protection provided in this Plan includes a presumption against hydraulic fracturing, otherwise known as 'fracking', on the basis that the British Geological Survey concluded in a 2014 report for the Department of Energy and Climate Change that "there is no significant Jurassic shale gas potential in the Weald Basin". From this, the London Plan concludes that it is highly unlikely that there is any site that is geologically suitable for a fracking development in London.

**17.28** Planning for aggregates at the strategic level is provided by the London Plan. Waltham Forest has no requirement for a landbank apportionment in the London Plan (2021). However, the London Plan notes that there could be some potential for aggregate extraction beyond the boroughs identified. There is no history of gravel extraction in Waltham Forest in the recent past. As far as is known, the only materials present are gravels laid in shallow deposits across much of Leyton and South Walthamstow. They are mainly built over and their extraction

is unlikely to be practical either in environmental or economic terms. Other deeper deposits are understood to be located in the Lee Valley, mainly on protected land owned by the Lee Valley Regional Park Authority and Thames Water Plc.

**17.29** The Local Plan makes no provision for mineral extraction or handling as there is currently no such activity in the primary sector of the economy. For the provision and supply of minerals generally, Waltham Forest relies on alternative handling facilities elsewhere in London and from other regions, including the South East and East.



**Policy 80****Trees**

- A. Development proposals must retain and protect significant existing trees, including:
- i. Those with high amenity value and those which have scope for screening other properties/features; and
  - ii. Veteran, ancient and notable trees.
- B. Development proposals will only be supported where they:
- i. Take particular account of existing trees on the site and on adjoining land;
  - ii. Retain trees of significant amenity, historic or ecological/habitat conservation value;
  - iii. Would not give rise to any threat, immediate or long term, to the continued well-being of trees of significant amenity, historic or ecological/habitat conservation value;
  - iv. Demonstrate that retained trees can be satisfactorily protected from construction impacts and site works; and
  - v. Positively integrate retained trees as part of a well-considered, sustainable soft landscaping scheme.
- C. In exceptional circumstances, and only where sufficient evidence is provided to justify their loss, significant existing trees may be removed. In these instances, development proposals will only be supported where they:
- i. Re-provide the amenity, canopy, habitat and biomass of the existing trees through the planting of significant mature trees within the proposed scheme; or
  - ii. Calculate the full Capital Asset Value for Amenity Trees (CAVAT) value of any trees lost and make appropriate mitigating financial contributions, which will be redirected towards local green infrastructure provision as set out in the Green and Blue Spaces and Developer Contributions Supplementary Planning Documents (SPDs).

**17.30** Through the use of Tree Preservation Orders (TPOs), the Council will continue to protect trees that contribute to the amenity of an area or that are under threat from inappropriate pruning works or removal.

**17.31** Anyone proposing to cut down or carry out work to a tree in a conservation area is required to give the Council six weeks' prior notice. In certain situations, a TPO may be placed on a tree within a conservation area to prevent works being carried out. It is an offence to prune, fell or damage a tree in a conservation area without giving notice.

**17.32** The trees of Waltham Forest are an important asset that provide numerous benefits to residents and visitors. The London Urban Forest Plan (2020)<sup>(69)</sup> sets out the benefits of the urban forest and its place in the National Park City.<sup>(70)</sup> These benefits include their contribution to positive physical and mental health, character and placemaking, the provision of habitats and biodiversity, the provision of shade and reductions to the urban heat island effect. Trees also play an important role in enhancing air quality and reducing surface water flooding. As such, it is important that existing trees are retained and complemented with new tree planting.

**17.33** Tree planting should form an integral part of any development scheme and trees should be considered essential features for establishing well designed, high quality places. It is therefore important to plan for the planting of new trees part of a successful development. When identifying locations for new trees, it is vital that eventual root and branch growth are taken into account in order to determine accurately how much space will be needed in the future to ensure the tree survives and thrives.

**17.34** Existing trees should be integrated positively into new development. At the earliest stage of design, the relationship between the built form and retained trees should be fully considered. The appropriate arboricultural information should be obtained, applied and submitted as part of any planning application to demonstrate that layouts have been informed by appropriate surveys and tree constraints mapping information.



**17.35** Tree planting schemes should include a diverse range of appropriate species, ages and sizes in order to contribute to a feeling of place - providing instant impact and a biodiverse mature habitat, whilst complementing building architecture.

**17.36** Tree planting should seek to enhance public areas within developments whilst ensuring clear sightlines and open outlook are maintained so as not to compromise community safety. This should be achieved through appropriate species selection and well-designed planting schemes.

**17.37** Trees should be planted to form an integral part of multi-functional green corridors and, wherever possible, linked planting pits should be used to connect with other green infrastructure features.

**17.38** In exceptional circumstances, trees may be removed where the wider public planning benefit would outweigh their retention. The amenity value of existing trees should be evaluated through the Capital Asset Valuation of Amenity Trees (CAVAT) method and reprovided by the planting of mature trees of appropriate species across the scheme and/or making financial

69 [London Urban Forest Plan](#)

70 [London National Park City](#)

reimbursements to mitigate the loss of amenity, biodiversity and other benefits. CAVAT is a tool for measuring the amenity value of trees. It expresses the value of a tree in monetary terms in a way that is directly related to the quantum of public benefits that each tree provides.

**17.39** Any proposal that requires the removal of a significant tree to occasion development will require robust justification. The Council will resist the unsubstituted loss of trees and there is a general presumption towards retention, backed up by appropriate protection. Typically, the more prominent the tree the greater the likelihood it should be protected and retained. Where exceptional circumstances as referred to above arise, the Council will expect a strong written justification by a suitably qualified individual, based upon and accompanied by the requisite standard of current evidence in support of the proposed tree removal.

## Policy 81

### Epping Forest and the Epping Forest Special Area of Conservation

In line with the Green and Blue Spaces Supplementary Planning Document (SPD), the Council will protect and enhance the natural environment of the Epping Forest and its Special Area of Conservation (SAC) and seek to ensure that development proposals contribute to the avoidance and mitigation of adverse recreational and urban effects on the SAC by ensuring that:

- A. All new residential development comprising 1 or more new home(s) within the 6.2km Zone of Influence (ZOI) of the boundary of the Epping Forest SAC (see the Policies Map) contributes to the delivery of:
  - i. The Strategic Access Management and Monitoring Strategy (SAMMS) in line with the mitigation measures agreed with the Conservators of Epping Forest and partner authorities; and
  - ii. The provision of Suitable Alternative Natural Green Spaces (SANGs), in most cases via Community Infrastructure Levy (CIL) funding secured to make the necessary investment in open space.
- B. Development proposals affecting Epping Forest and the Epping Forest SAC are sensitive and proportionate, that they deliver enhancements where possible and that they do not contribute to adverse impacts on ecological integrity, amenity or visitor enjoyment;
- C. All planning applications and allocations of one new home or more in the 6.2km ZOI of the Epping Forest SAC demonstrate, through a project level Habitats and Regulations Assessment (HRA), that they will not generate adverse recreational pressure on the Epping Forest SAC.
- D. Planning applications and allocations for development within 400m of the Epping Forest SAC demonstrate, through a project level Habitat Regulation Assessment (HRA), that the development will not generate adverse urban effects on the integrity of the SAC.

**17.40** Epping Forest is a former Royal Forest, now managed by the City of London as the Conservators of Epping Forest since it was given to the people of London under the Epping Forest Act of 1878. The Epping Forest is a Natura 2000 Special Area of Conservation under the EC Habitats Directive transposed into UK law under the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. Natura 2000 is a network of sites selected to ensure the long-term survival of Europe's most valuable and threatened species and habitats.<sup>(71)</sup>

**17.41** Epping Forest is the largest open space in London. It comprises ancient woodland and acid grassland occupying an area of approximately 2,450-hectares bordering London and Essex. It stretches from Manor Park to just north of Epping, with the main body of the Forest being located to the west of Loughton. Two-thirds of the Forest has been designated a Site of Special Scientific Interest (SSSI) and a Special Area of Conservation (SAC).

**17.42** Broadly, the Forest comprises a mix of habitats as follows: Inland water bodies (6%), Bogs, Marshes, Fens (0.2%), Heath, Scrub (3.8%), Dry grassland, Steppes (20%) and Broad-leaved deciduous woodland (70%).<sup>(72)</sup>

**17.43** As distinct from the larger part of the forest, the Epping Forest SAC forms the edge of the borough along its northern aspect where the borough abuts the administrative area of Epping Forest District Council and the eastern edge where the borough abuts the London Borough of Redbridge with the London borough of Newham lying further to the south beyond Wanstead Flats. It should be noted that the entirety of Waltham Forest Borough lies within the 6.2km Zone of influence (ZOI) of the SAC.

**17.44** In recent years the challenge of balancing the needs of the high (and growing) numbers of visitors with the natural aspect of the forest and the nature conservation interest of the SAC has become more challenging. Accordingly, the Council has been working with neighbouring authorities in London and Essex as part of the Memorandum of Understanding (MoU) Group under the Duty to Cooperate introduced under the Localism Act 2011.

**17.45** Under the Conservation of Species and Habitats Regulations 2017 (as amended) the Council is a “competent authority” working with other competent authorities to decide whether or not a plan or project can proceed having undertaken the following “appropriate assessment requirements” to:

- Determine whether a plan or project may have a significant effect on a European site;
- If required, undertake an appropriate assessment of the plan or project;
- Decide whether there may be an adverse effect on the integrity of the European site in light of the appropriate assessment.

**17.46** There are known current challenges to the integrity of the SAC in which Waltham Forest plays a role. These include in particular, threats posed by air pollution and recreational pressures. The main threats and challenges are set out in Natural England’s (NE’s) European Site Conservation Objectives.<sup>(73)</sup>

71 [https://ec.europa.eu/environment/nature/natura2000/sites/index\\_en.htm](https://ec.europa.eu/environment/nature/natura2000/sites/index_en.htm)

72 Epping Forest Habitat Mix: <https://sac.jncc.gov.uk/site/UK0012720>

73 Supplementary advice on conserving and restoring site features (2019) .  
(UK0012720\_EppingForestSAC\_COSA\_Formal%20Published%2023%20Jan%2019%20(1).pdf)

**17.47** The Council therefore has duties as a competent authority to ensure that planning policy and decisions do not result in adverse effects upon the SAC. The Council's Habitats Regulations Assessment (HRA) confirms that the level of development proposed in this Plan will not have an adverse effect on the integrity of the Epping Forest Special Area of Conservation (SAC) alone and in combination with other plans in relation to air quality. Policy 95 'Monitoring Growth Targets' ensures that a Plan review would be triggered in the unlikely event that traffic levels in the vicinity of the Epping Forest Special Area of Conservation increase as a result of the planned growth in Waltham Forest.

**17.48** In order to avoid and mitigate any potential negative effects resulting from recreational pressure, in line with Policy 81 'Epping Forest and the Epping Forest Special Area of Conservation', Strategic Access Management and Monitoring Strategy (SAMMS) contributions will be sought through Section 106 legal agreements, and Suitable Alternative Natural Greenspaces (SANGs) will be delivered in line with the Council's SANG Strategy. In most cases, SANGs will be delivered through Community Infrastructure Levy (CIL) funding, but where a scheme is not liable to pay CIL an appropriate contribution will be sought through a Section 106 agreement.

**17.49** The effectiveness of the SANG Strategy will be assessed by measuring visitor numbers on the sites identified within it and a full or partial review of the Plan will be triggered if the estimated visitor uplift figures are not met (see Policy 95 'Monitoring Growth Targets'). This is required to ensure that there is evidence of the direct impact of new housing completions on the use of these green spaces once the proposed interventions have been put in place. In addition to this targeted monitoring of new developments, other monitoring is in place to track visitor numbers to the Epping Forest SAC and the quality of the SAC itself. A commitment has been made in the SAMM Strategy to review visitor numbers to the SAC at least every five years. Natural England, along with the Conservators of Epping Forest, are also obliged to carry out condition surveys of the Epping Forest SAC and would notify the competent authorities of the findings from these, including any further deterioration in quality.

**17.50** Development proposals within 400m of the SAC which may result in urban effects will be encouraged to have early discussions and engagement with Natural England on potential mitigation measures.

**Policy 82****The Lee Valley Regional Park**

- A. Development proposals which affect the Lee Valley Regional Park will be required to:
- i. Include measures for the protection, enhancement and where possible, the extension of the borough's network of Green Corridors;
  - ii. Improve access and links to the park and its waterways; and
  - iii. Be sensitive and proportionate, and not contribute to adverse impacts on amenity, ecological integrity or visitor enjoyment. Proposals will be expected to deliver enhancements where possible. The Council supports the Lee Valley Regional Park Authority's Park Development Framework<sup>(74)</sup>. The content of the Lee Valley Park Development Framework, as adopted, is a material consideration in the determination of planning applications.
- B. Development proposals will not normally be granted planning permission where they pose adverse direct or indirect effects on any land or area identified with the Lee Valley Special Protection Area (SPA)/Ramsar. Development that affects the Lee Valley SPA/Ramsar will be expected to contribute to the mitigation of any adverse effects on the SPA/Ramsar.
- C. Planning applications for development at Blackhorse Lane will need to be accompanied by a project level Habitats Regulations Assessment (HRA) to ensure the development will not generate adverse urban effects on the integrity of the Lee Valley SPA/Ramsar.

**17.51** The Lee Valley Regional Park is a major asset for Waltham Forest providing valuable benefits to local communities in terms of access to nature and to healthy outdoor recreation. The Council supports Lee Valley Regional Park Authority's Park Development Framework. The Council will work cooperatively with the Lee Valley Regional Park Authority in protecting and enhancing the Lee Valley Regional Park and the Special Protection Area (SPA). Development proposals that would result in additional urbanisation or recreation effects will be encouraged to have early discussions and engagement with Natural England on potential mitigation measures.

**17.52** The Lee Valley Regional Park Authority (LVRPA) is a statutory authority created by the Lee Valley Regional Park Act 1966 (The Park Act). It has a statutory responsibility to either provide directly or work with partners to provide facilities for sport, recreation, leisure, entertainment and nature conservation throughout the Park. Section 14(1) of the Park Act requires the Authority to prepare a plan setting out proposals for the future management and development of the Regional Park and riparian authorities such as Waltham Forest are required to include those parts of the plan affecting their area within their own relevant planning strategies and policies (Section 14(2)8(a)) (although inclusion does not infer that the planning authority necessarily agrees with them (Section 14(2) (b)). Both the Park Plan 2000 and The

Park Development Framework Area Proposals are relevant in terms of Section 14(2) of the Park Act and are formal statements of the Authority's position in respect of development within the Regional Park.

**17.53** Further, Sections 14 (subsections 4-7) of the Park Act requires local planning authorities to consult with the LVRPA on applications for planning permission which they consider could affect the Park. Section 14 (subsections 8-9) allows the LVRPA to refer the decisions of the riparian authorities to the Secretary of State if it is considered by the LVRPA that the decision taken materially conflicts with the proposals of the Authority for the development of the Park.

### Policy 83

#### Protecting and Enhancing Waterways and River Corridors

Proposals affecting waterways should:

- A. Result in no deterioration of Water Framework Directive waterbodies and ensure that all adverse impacts on waterbodies are mitigated and that environmental net benefits are achieved;
- B. Obtain an Environmental Permit from the Environment Agency for works in, under, over and adjacent to watercourses; and
- C. Ensure the use by freight transport is not inhibited and where possible increased. Buffer zones of at least 8m for main rivers and 5m for ordinary water courses should be established and left free of any permanent structures. Where it is not possible to do so, strong justification should be provided. Where provided, buffer zones should be carefully integrated with new developments, so they do not create dead spaces.

**17.54** Waterways in Waltham Forest support a range of ecological resources, many of which are covered under European and national legislation. Environmental net benefits such as naturalisation and deculverting are valuable for the management of nature conservation and flood risk of waterways. Wider regeneration objectives can be met through the enhancement of the quality and amenity value of the water environment. To ensure this is achieved, the Council will consult the Environment Agency so that adequate evaluation can be undertaken and statutory consents can be granted. It is preferable that an Environmental Permit is obtained after planning permission has been granted.

**17.55** Environmental permits are required for any activities which will take place on or within 8m of a main river (16m if tidal), on or within 8m of a flood defence or culvert (16m if tidal), involving quarrying or excavation within 16m of a main river, flood defence or culvert in a floodplain more than 8m from the riverbank, culvert or flood defence structure and there is no planning permission.

**17.56** The presence of the River Lee and the Lee Valley Regional Park is among the key defining characteristics of the borough. Water quality and water resource management have direct impacts on the public's ability to enjoy the Park's leisure, sporting and nature

conservation facilities and sites. Water is intrinsic to many of the Park's nationally and internationally recognised sites, such as the Lee Valley Special Protection Area (SPA) and Ramsar site (following the international Convention on Wetlands held in Iran in 1971). The Park is also host to the Walthamstow Reservoirs and Marshes, the Waterworks attraction on Lea Bridge Road, in addition to boating activities on the River Lee and the River Lee Navigation.

**17.57** Waterways also provide a unique setting for buildings and the uses which occupy them. Design solutions that derive inspiration from the water environment and complement the physical context in relation to visual appearance, scale and ecological integrity will help ensure new developments do not have an adverse impact on the water environment.



**17.58** Rivers have been degraded in certain locations by previous development, such as the Dagenham Brook. There may be future redevelopment opportunities adjacent to waterways that do not compromise wildlife, flood relief or amenity use, and these will be encouraged where they act as a catalyst for attractive regeneration or deliver enhancement works.

**17.59** Waterways are also valuable for freight transport, providing key routes through London. It is therefore important that such use is not inhibited, but increased.

**17.60** The Council is keen to increase public access to waterways for recreation, but this should be balanced with the need to prevent undue disturbance on sensitive species and habitats. This has been achieved at the Walthamstow Wetlands, where the aspiration to establish better access to nature, enhance heritage assets and foster connectivity with other open spaces including the Queen Elizabeth Olympic Park has been realised. Where relevant,



the Council will seek to retain these benefits through the planning application process and the use of developer contributions as set out in the Developer Contributions Supplementary Planning Document (SPD).

**Policy 84****Food Growing and Allotments**

Existing allotments are accorded the highest level of protection in this Plan.

- A. There should be no net loss of allotment sites, and the intensification of land currently used to grow food will be supported where management arrangements allow.
- B. Development proposals will be expected to contribute to the supply, quality and accessibility of private and communal spaces on which to grow food and flowers. This may be in the form of financial or on-site contributions. On-site contributions must be supported by a maintenance plan at application stage.

**17.61** There are 27 Council-managed allotment sites, seven non-Council managed leased sites and four privately owned allotment sites in Waltham Forest. Demand for allotments is high and the Council seeks to protect all existing sites and where possible support the provision of new allotments. The Council welcomes the expansion and improvement of existing allotments and community food growing schemes.

**17.62** Spaces such as allotments provide positive physical and mental health benefits to residents through healthy lifestyle adjustments such as the opportunity to produce and consume fresh healthy food, spend time in the open air and meet with others.

**17.63** The Council will encourage food growing and community gardening initiatives on existing open spaces and temporarily derelict land where short or medium-term development is not planned.

**17.64** In all cases consideration must be given to the installation and maintenance of facilities for equipment storage and arrangement for composting. There must be no detrimental impact on the character, appearance and amenity of the surrounding area, and to equality of access and security.

**Implementation**

**17.65** The main tools the Council has in delivering the policies in this section of the Plan are through the planning application process and allocation of sites in Local Plan Part 2 - Site Allocations. Other tools and initiatives available to support implementation include:

- Developer Contributions through Community Infrastructure Levy (CIL) and Section 106 contributions;
- The Green and Blues Spaces Supplementary Planning Document (SPD) (including the Suitable Alternative Natural Greenspace Strategy) and the Developer Contributions Supplementary Planning Document (SPD); and
- Ongoing work with partners, including neighbouring local authorities, the Conservators of Epping Forest, the Lee Valley Regional Park Authority and Natural England to improve access to open space recreational areas and to protect designated sites such as the Epping Forest SAC and the Lee Valley Regional Park SPA.

Protecting and Enhancing the Environment



## Addressing the Climate Emergency

### Strategic Objective

Build Waltham Forest's resilience to climate change through addressing all aspects of sustainability, efficient waste management and the effects of climate change at all stages in the development process.

**18.1** At a Full Council Meeting in April 2019, Waltham Forest declared a Climate Emergency. Strategically addressing climate change is a key challenge facing the borough in delivering sustainable development. We must ensure that new development adds to the borough's capacity for resilience in mitigating and adapting to any adverse climate change impacts. Careful management must be taken to minimise any further impact on the natural environment now that the borough has formally declared a Climate Emergency.

Waltham Forest is committed to reaching net zero carbon emissions by 2030. To achieve this target, the Council has published a Climate Action Plan<sup>(75)</sup> which sets out 20 actions across the following four areas:

1. **Energy efficient buildings** - that ensure all residents can live comfortably and affordably.
2. **A place for people not cars** - where residents can travel affordably, safely and easily using active travel, like walking and cycling, and sustainable mass transport, like bus and rail.
3. **Consuming less, recycling more** - where we produce less waste, use less plastic, and meet our needs in new collaborative ways through sharing, reusing and repairing.
4. **A greener, more resilient borough** - that promotes nature, health and well-being and increases the resilience of communities to future heatwaves and floods.

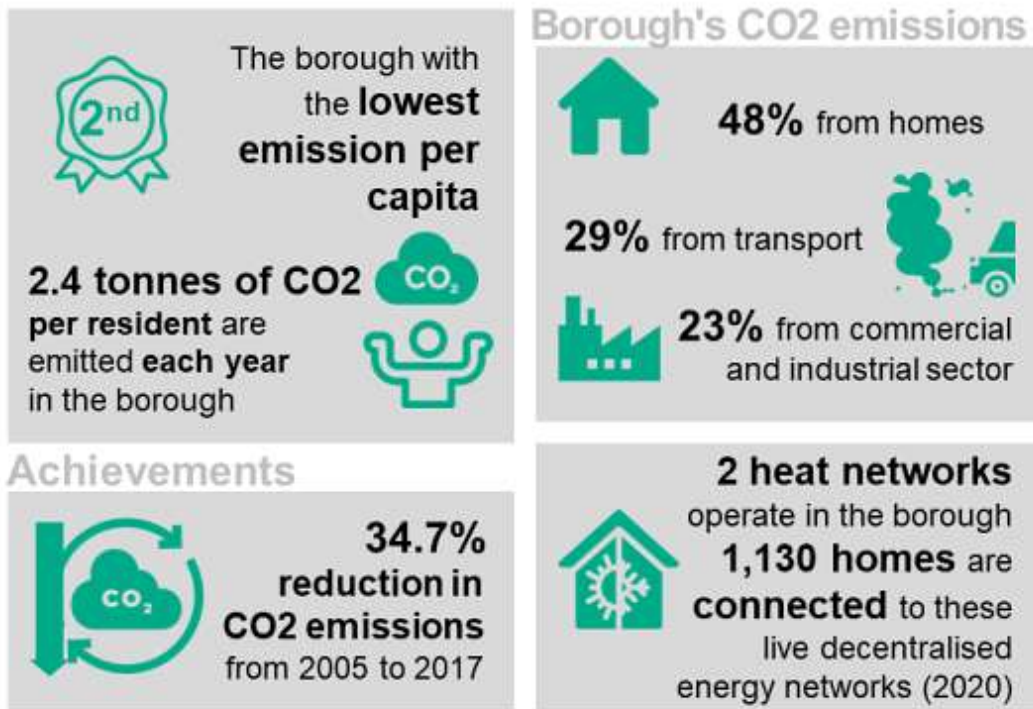


Figure 18.1 Addressing the Climate Emergency in Waltham Forest

**Policy 85**

**A Zero Carbon Borough**

Greenhouse gas emissions will be minimised, the borough's carbon footprint will be reduced and energy efficiency within developments will be maximised by:

- A. Requiring all development to promote low carbon energy generation and maximise the opportunity for renewable energy following the London Plan energy hierarchy;
- B. Requiring all development of more than one home or greater than 100sqm to be supported by an Energy Assessment (for major development schemes this must be undertaken in accordance with GLA's latest Energy Assessment Guidance) setting out energy information for the development to demonstrate compliance with the following:

- i. All new major development must meet or exceed the net zero-carbon emissions target in line with the London Plan energy hierarchy and in line with best practice guidance including the GLA's latest energy planning guidance.
  - ii. All new build development of more than one home or greater than 100sqm must achieve a minimum of 35% reduction below Part L of the Building Regulations on-site, targeting net zero carbon where possible, in line with the London Plan energy hierarchy and with best practice guidance, including the GLA's Energy Planning Guidance. Development should meet the following London Plan 'Be Lean' stage (energy efficiency) carbon reduction targets before other measures are incorporated to meet the overall 35% reduction target, achieving a minimum of:
    - a. 10% reduction below Part L of the Building Regulations for residential development;
    - b. 15% reduction below Part L of the Building Regulations for non-residential development;
  - iii. Carbon Offset Fund (COF) contributions will then be required for any shortfall in emission reductions;
- C. Preparing energy masterplans for large scale development locations in accordance with the criteria set out in London Plan Policy SI3 'Energy Infrastructure' Part B. Energy masterplans should identify:
- i. Major heat loads (including anchor heat loads, with particular reference to sites such as universities, hospitals and social housing);
  - ii. Heat loads from existing buildings that can be connected to future phases of a heat network;
  - iii. Major heat supply plant including opportunities to utilise heat from energy from waste plants;
  - iv. Secondary heat sources, including both environmental and waste heat;
  - v. Opportunities for low temperature heat networks;
  - vi. Possible land for energy centres and/or energy storage;
  - vii. Possible heating and cooling network routes;
  - viii. Opportunities for futureproofing utility infrastructure networks to minimise the impact from road works;
  - ix. Infrastructure and land requirements for electricity and gas supplies;
  - x. Implementation options for delivering feasible projects, considering issues of procurement, funding and risk, and the role of the public sector; and
  - xi. Opportunities to maximise renewable electricity generation and incorporate demand-side response measures.

**18.2** To align with London Plan targets and the transition towards the Council's ambition for zero carbon emissions by 2030, a clear carbon reduction target must be set and attention focused on delivering energy efficient development in accordance with the Mayor's energy hierarchy. This energy hierarchy aims to minimise demand and address supply and renewable energy provision. This will be the context for the use of smart technologies and low-carbon and renewable energy sources.

**18.3** The preparation of energy assessments at the application stage will be required to demonstrate how climate change mitigation measures in major developments meet or preferably exceed the requirements of the London Plan's energy policies and energy hierarchy. Energy Assessments must follow the [Energy Assessment Guidance](#) as set by the GLA.

**18.4** The Council encourages energy efficiency improvements to existing buildings going beyond minimum building regulations requirements. Applications for retrofitting listed buildings or properties in conservation areas should seek advice from the Council's Conservation Officer at an early stage. This would confirm if planning permission is required and consider whether installing the energy efficiency measures would have a detrimental impact on the building. Further guidance will also be provided in the Retrofit and Residential Extension Supplementary Planning Document (SPD).

**18.5** The Council will prepare energy masterplans for large scale development locations. Developers will be expected to take these masterplans as the starting point for their energy strategies, which should provide analysis of energy supply and demand as well as the potential to use low or lower carbon communal and district heating networks. The creation and expansion of district heating networks in priority areas will here be encouraged in line with the London Plan.

**18.6** Carbon Offset Fund (COF) contributions will be expected from all relevant development where carbon targets cannot be met on-site. This will fund carbon reduction projects within the borough and help to offset the carbon impact of development. It is recognised that on-site reductions have a greater impact on reducing carbon emissions than financial contributions 'in lieu' and therefore the Council expects all developments achieve a minimum of 35% on-site carbon reduction as per Policy 85 'A Zero Carbon Borough'.

## Policy 86

### Decentralised Energy

- A. To maximise use of low carbon heating systems, all development in the following categories should install a communal heating system and either connect to an existing district heating network (where one exists) or 'future-proof' the system by ensuring the development is able to connect to a district heating network in the future:

- i. All major development; and
  - ii. All development of one or more homes, or greater than 100sqm, that is located within 200m of an existing, proposed or committed future district heating network;
- B. Unless demonstrated to the Local Planning Authority's written satisfaction that such a connection is not feasible or viable, in line with the GLA's latest energy assessment guidance.



**18.7** The London Plan recognises that decentralised energy and local secondary heat sources will become an increasingly important element of London's energy supply and help London become more self-sufficient and resilient in relation to its energy needs.

**18.8** The adoption of district heating systems is a form of decentralised energy which increases heating efficiency, allows quicker decarbonisation of heat and will help Waltham

Forest decrease its carbon emissions. New development in the borough will therefore be expected to install communal heating systems and instigate or connect to district heating energy networks where appropriate, to provide a more sustainable source of heating and hot water in line with the London Plan.



**Policy 87****Sustainable Design and Construction**

- A. The design, construction and operation of all new development should be informed by the latest London Plan and associated guidance, and development proposals should clearly demonstrate how they integrate sustainable design standards.
- B. In line with the requirements below, applications for residential development of one or more new homes, or non-residential development of greater than 100sqm are required to submit a Sustainability Statement to demonstrate compliance with the following planning policy objectives:
- i. Ensuring that non-residential development greater than 100sqm achieves a minimum of BREEAM 'very good' (or equivalent) standards, and encouraging major non-residential development to achieve 'excellent' (or equivalent);
  - ii. Encouraging residential development to target higher standards of sustainability, including the Home Quality Mark and Passivhaus or equivalent;
  - iii. Ensuring that development of one or more homes, or greater than 100sqm, is designed according to sustainable development principles to achieve zero-carbon targets in line with the London Plan and Policy 85 'A Zero Carbon Borough';
  - iv. Adopting sustainable construction and demolition methods, including using sustainably sourced, reused and recycled materials and where feasible demolished material from the development site;
  - v. Controlling and monitoring dust, NOx, PM10 and PM2.5 emissions from development aligned with measures set out in Policy 88 'Air Pollution';
  - vi. Maximising Urban Greening and blue and green infrastructure measures, and incorporating 'living building' principles into new and existing developments, including measures to improve biodiversity;
  - vii. Minimising waste during the construction and operation phases of development in line with the Circular Economy Statement and Whole Lifecycle Carbon assessment, as required by the London Plan, to cover the whole lifecycle of the development on referable schemes;
  - viii. Providing a clear strategy for adequate waste and recycling storage and collection facilities; and
  - ix. Supporting the appropriate low-carbon retrofitting of existing buildings to reduce carbon emissions beyond building regulations requirements, through energy efficient design of the site, buildings and services.

**18.9** By aiming to exceed national standards (such as Building Regulations) and encouraging development that enhances the natural environment, this policy will further support low-carbon, sustainable development. The adoption of sustainable design principles, use of sustainable construction methods and building materials in addition to measures to increase resource efficiency will be supported. This will help to reduce greenhouse gas emissions, aid prevention of adverse environmental impacts, and help to ensure resilience

to the impacts of climate change. Guidance as set out in the Mayor of London's 'The Control of Dust and Emissions During Construction and Demolition' Supplementary Planning Guidance (SPG)<sup>(76)</sup> should also be followed.

**18.10** If BREEAM, Home Quality Mark, Passivhaus or the Mayor's Sustainable Design and Construction Supplementary Planning Guidance (SPG)<sup>(77)</sup> is replaced or amended during the lifetime of this Plan, the equivalent replacement requirements will be applied.

**18.11** Applications for retrofitting listed buildings or properties in conservation areas to ensure greater energy efficiency, should seek advice from the Council's Conservation Officer at an early stage. This would confirm if planning permission and/or listed building consent is required and consider whether installing the energy efficiency measures would have a detrimental impact on the heritage significance of the building or the conservation area. A new Retrofit and Residential Extensions Supplementary Planning Document (SPD) will provide additional guidance on this.

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76 [Mayor's Control of Dust and Emissions During Construction SPG](#)

77 [Mayor's Sustainable Design and Construction SPG](#)

**Policy 88****Air Pollution**

New development should ensure the avoidance of any adverse air pollution impacts and aim to improve air quality in the borough by:

- A. Ensuring development meets, and where possible improves upon, air quality neutral standards over its lifetime and does not contribute to a decrease in air quality during the construction or operation stage;
- B. Undertaking Air Quality Assessments (AQAs) for the following types of development:
  - i. All major development, unless there is clear evidence that transport and building emissions will be less than the existing use;
  - ii. Development in areas of substandard air quality and changes of use which would result in the introduction of sensitive receptors to areas of poor air quality;
  - iii. Development in close proximity to sensitive uses; and
  - iv. Developments which involve significant demolition and construction;
- C. Ensuring development is air quality positive in Air Quality Focus Areas;
- D. Assessing existing air quality and avoiding locating sensitive uses in areas exposed to air pollution;
- E. Minimising exposure to air pollution through the considered positioning and design of new development, considering private, communal, public open space and child play spaces;
- F. Incorporating on-site measures to improve air quality, or, where it can be demonstrated that on-site provision is impractical or inappropriate, securing off-site measures to improve local air quality, subject to the demonstration of equivalent air quality benefits; and
- G. Ensuring that where major application proposals would not achieve the air quality neutral benchmark, the applicant will be expected to make a financial contribution as set out in the Developer Contributions Supplementary Planning Document (SPD).

**18.12** Air pollution has significant impacts on climate and human health. It is essential that exposure to atmospheric pollutants is minimised across the borough. Due to its high air pollution levels, Waltham Forest has published an Air Quality Action Plan for 2023 to 2028<sup>(78)</sup> establishing plans to improve local air quality, which is a priority within the borough. Existing concentrations of nitrogen dioxide and particulates (PM2.5, PM10) are of considerable concern and pose a significant threat to human health, particularly where they are most heavily concentrated along major roads and in areas of high motor vehicle activity.

**18.13** Development that aims to improve upon air quality neutral standards will be strongly supported, and larger scale developments in particular will be expected to be air quality positive in line with the London Plan. Innovative design solutions, urban greening and other

mitigation strategies will also be encouraged to improve air quality in all relevant development proposals. In accordance with the London Plan, Air Quality Assessments will be required for major developments, developments associated with sensitive uses/receptors and where considerable demolition will occur.

**18.14** Air Quality Assessments will also be required where there will be a significant increase in vehicular traffic and the use of more polluting technologies including the use of Non-Road Mobile Machinery (NRMM) in construction. This will help to identify any major sources of pollution, constraints placed on sites by poor air quality, suitable land uses for sites, and design strategies that could improve air quality. Direct exposure to air pollution will be minimised through intelligent design of new development, and the plan will support on/off-site measures where they clearly demonstrate the delivery of air quality improvements in line with the London Plan.

**18.15** Development proposals will be required to submit Transport Assessments in line with the requirements of Policy 63 'Development and Transport Impacts' to ensure that there is an overall net reduction in traffic and improvement in air quality across the borough as a result of Plan policies. Traffic which may affect air quality within 200m of the Epping Forest Special Area of Conservation (SAC) will be monitored through Policy 95 'Monitoring Growth Targets'.

**Policy 89****Water Quality and Water Resources**

New development should prevent any adverse impacts on water quality and water supply by:

- A. Ensuring no deterioration of water quality. Where development is seen to have the potential to cause adverse effects on water quality, appropriate mitigation to alleviate risk must be provided;
- B. Ensuring developments include water efficiency measures including rainwater harvesting, greywater recycling and smart-metering;
- C. Requiring development to be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to achieve maximum water credits in BREEAM or equivalent. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption). Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met; and
- D. Working with infrastructure providers (Policy 68 'Utilities Infrastructure') to protect existing water and sewerage infrastructure and manage pressure on combined sewer networks.

**18.16** Maintaining a high level of water supply and quality are critical within the borough, as are measures to improve water use efficiency. Climate change increases the likelihood of serious and prolonged droughts, owing to increasing temperatures and climatic variability. Without appropriate control and mitigation, development can lead to decreased water quality through pollution and put stress on the existing water supply and waste-water infrastructure. With water demand soon forecast to exceed water supply, the borough needs to adapt to increasing water scarcity, especially during summer months and it must ensure the prevention of water pollution through new development. This policy aims to address both issues, and will support development that devises appropriate mitigation measures to protect water quality in line with the Thames River Basin Management Plan and Catchment Flood Management Plans.



**18.17** In line with the London Plan, water efficiency measures will be required to help maximise water supply and the Council will require developers to meet water consumption targets of 105 litres plus an allowance of 5 litres per person for external water use or less per day per person in residential developments.

**18.18** Water saving and reuse fittings and appliances, alternative water sources and low water-consuming landscaping can all help to maximise water efficiency. Developers should follow best practice guidance as set out in the Mayor of London's 'Sustainable Design and Construction' Supplementary Planning Guidance (SPG). In addition, non-residential development and refurbishments will be required to achieve maximum BREEAM water credits to help conserve water.

**18.19** The mismanagement of sewer systems leads to significant contamination from foul water in the borough's open surface water. Careful management of this infrastructure is therefore critical, and we will ensure that new development proposals incorporate designs that prevent cross-contamination between foul and surface water, as required in the London Plan. The sufficient provision of wastewater infrastructure capacity will also be essential in order to appropriately manage foul and wastewater, in addition to minimising the pressure placed on combined sewer networks. This will further reduce the risk of contamination and water pollution, which will lead to a more sustainable water supply and improved health.

**Policy 90****Contaminated Land**

In order to manage contaminated land and prevent the spread of contamination:

- A. Site investigation and desk-based research should be undertaken, and a Preliminary Risk Assessment (PRA) should be submitted with all planning applications in line with current guidance for new developments proposed on contaminated or potentially contaminated land;
- B. New development must address the impacts of contaminated land on on/off-site sensitive receptors through proportionate action(s) during the construction phase and during the operation phase where appropriate, over the entire lifetime of the development. Where necessary, remediation proposals must be agreed to deal with any identified contamination; and
- C. Development that has the potential to contaminate land, or which is situated in close proximity to Groundwater Source Protection Zones (SPZs) or other sensitive receptors must include mitigation measures to prevent any adverse impacts on people and the environment, and to monitor any impacts where appropriate.

**18.20** Land that is seen to be affected by contamination will require thorough site visits and desk-based research, in addition to appropriate remediation strategies. This Plan supports developments which include mitigation measures to reduce the impact of land contamination on people and the environment and carefully manages the impact of development on sensitive receptors.

**18.21** When undertaking site assessments, site investigations, desk-based research and Preliminary Risk Assessments (PRAs) the guidance to be consulted includes the Environment Agency's Approach to Groundwater Protection (2018), the Model Procedures for the Management of Land Contamination (CLR11), and Managing and Reducing Land Contamination: Guiding Principles (GPLC).

## Policy 91

### Managing Flood Risk

A. Flood risk will be managed by:

- i. Ensuring that all site allocations pass the Sequential Test, and where necessary the Exception Test, steering new development to areas with the lowest risk of flooding from all sources.
- ii. Requiring a site-specific Flood Risk Assessment (FRA) for all development proposals which are situated in Flood Zone 2 or 3, and for proposals which are situated in Flood Zone 1, which:
  1. Are 1 hectare or greater in extent;
  2. Involve a change of use to a more vulnerable class;<sup>(79)</sup> or
  3. Are within an area identified as having more critical drainage problems;
- iii. Requiring site-specific FRAs to provide sufficient detail to assess the risk of flooding to, and arising from, development proposals from all sources, considering flood risk now and in the future.

B. As part of the site-specific FRA, development proposals must:

- i. Carry out a Sequential Test, unless:
  1. There is an adopted site allocation and the development proposal is consistent with the proposed use and there have been no significant changes to the known level of flood risk to the site; or
  2. The application is for development which is exempt from the Sequential Test<sup>(80)</sup>;
- ii. Carry out an Exception Test, where necessary,<sup>(81)</sup> to ensure the proposed development will provide wider sustainability benefits to the community that outweigh flood risk, and that it will be safe for its lifetime, without increasing flood risk elsewhere and where possible reduce flood risk overall; and
- iii. Demonstrate a sequential approach to layout within the development site, in order to ensure that the most vulnerable uses within a development are located in the lowest risk parts of the site.

79 [With reference to NPPF Annex 3: Flood risk vulnerability classification](#)

80 [With reference to NPPF paragraph 168](#)

81 [With reference to NPPF paragraph 163](#)



- C. The site-specific FRA should be proportionate to the anticipated degree of flood risk and must demonstrate how flood risk will be managed and mitigated to ensure the development is safe from flooding and the impacts of climate change for its lifetime. This must include appropriate flood-resistant design and construction, incorporation of Sustainable Drainage Systems (SuDS), safe management of residual risk, and appropriate emergency planning.
- D. Development proposals should incorporate SuDS unless there is clear evidence that this would be inappropriate. These must aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible.
- E. Where greenfield run-off rates cannot be achieved, a payment in lieu will be secured to mitigate flood risk.

**18.22** Site Specific Flood Risk Assessments are required for all development proposals situated in Flood Zone 2 or 3 or in Zone 1 on sites that are greater than 1ha, that involve a change to a more vulnerable use class or are situated in an area identified as having critical drainage problems. The objectives of a site-specific flood risk assessment are to establish:

- Whether a proposed development is likely to be affected by current or future flooding from any source;
- Whether it will increase flood risk elsewhere;
- Whether the measures proposed to deal with these effects and risks are appropriate;
- The evidence for the local planning authority to apply (if necessary) the Sequential Test; and
- Whether the development will be safe and pass the Exception Test, if applicable.

**18.23** As outlined in the policy, site specific FRAs should be proportionate to the anticipated degree of flood risk. When preparing FRAs, regard should be had to the guidance set out on page 36-40, Strategic Flood Risk Assessment 1 - which outlines the information that should the Council expects to be contained at three levels of the site specific FRA. These are:

- **Level 1 Screening:** to identify whether there are any flooding or surface water management issues related to a development site that may warrant further consideration.
- **Level 2 Scoping:** to be undertaken if the Level 1 FRA indicates that the site may lie within an area that is at risk of flooding, or the site may increase flood risk due to increased runoff.
- **Level 3 Detailed Study:** to be undertaken if a Level 2 FRA concludes that further quantitative analysis is required to assess flood risk issues related to the development site.

**18.24** The information provided in Table 6-2 of the Strategic Flood Risk Assessment 1 indicates the information requirements in relation to demonstrating aspects of the FRA.

**18.25 SuDS** - Sustainable Drainage Systems (SuDS) mimic natural drainage processes to reduce the effect on the quality and quantity of run-off from developments and provide amenity and biodiversity benefits. When specifying SuDS, early consideration needs to be made of potential benefits and opportunities so that flood resistant design is able to deliver the best results. SuDS measures generally operate through infiltration and attenuation combined with slow conveyance. SuDS are designed to both manage the flood and pollution risks resulting from urban runoff and to contribute wherever possible to environmental enhancement and placemaking. Further guidance on SuDS will be provided in the Green and Blue Spaces Supplementary Planning Document (SPD).

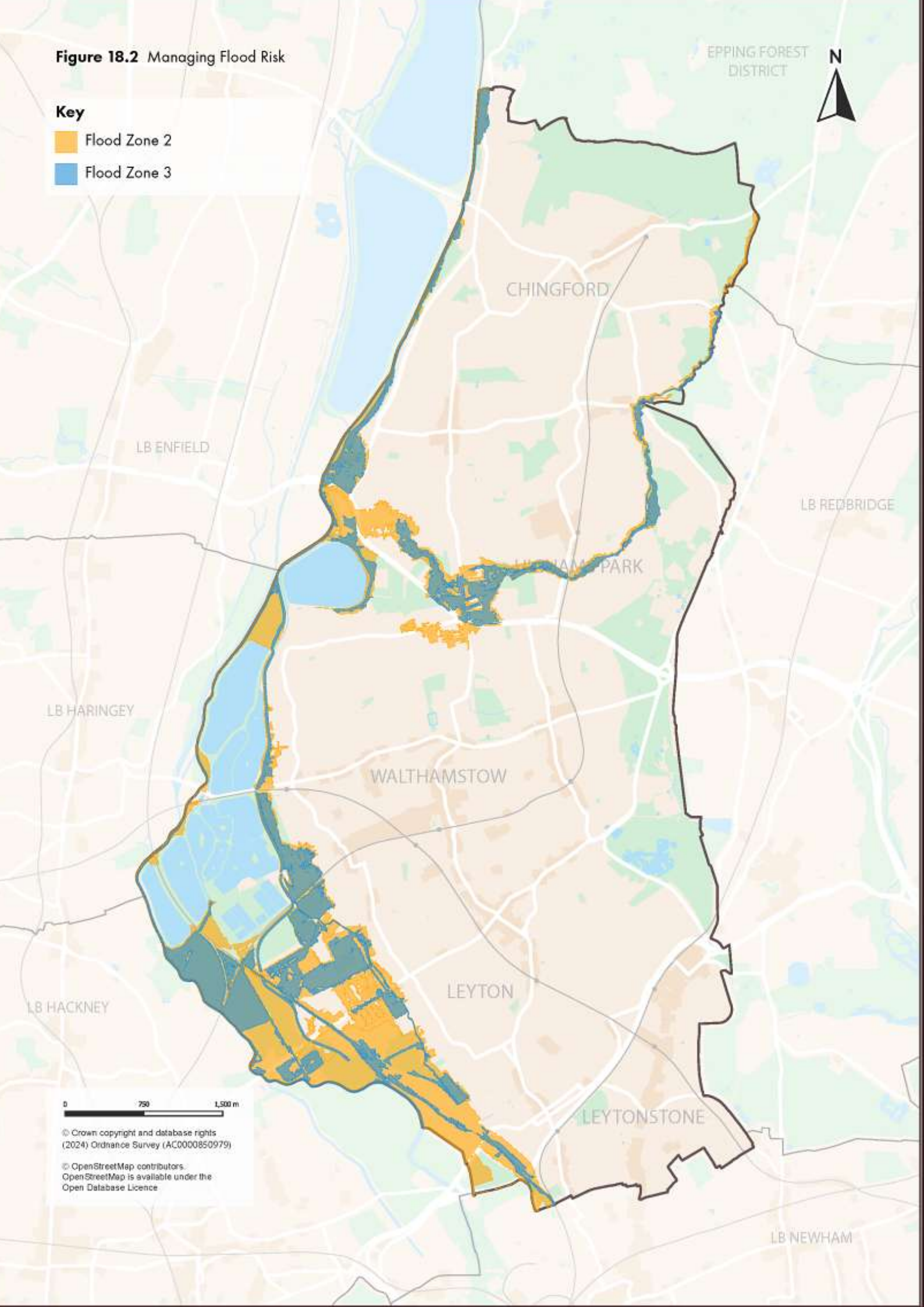
**18.26 Greenfield Runoff** - On sites that were previously developed, the peak runoff rate from the development to any drain, sewer or surface water body for the 1 in 1 year rainfall event and the 1 in 100 year rainfall event must be as close as reasonably practicable to the greenfield runoff rate (as specified by the Rainfall Runoff Management for Developments Report) from the development for the same rainfall event, but should never exceed the rate of discharge from the development prior to redevelopment for that event. Where the greenfield runoff rate is not able to be achieved, a payment in lieu of achieving this rate will be sought, whilst expecting the best possible on site runoff rate to be achieved. Further detail will be provided in the Developer Contributions Supplementary Planning Document (SPD).

**18.27** Surface Water runoff should be mitigated by the use of SuDS which are calculated inline with runoff estimation methods set out in CIRIA C753 (The SuDS Manual), and the incorporation of recycling of grey water and utilisation of natural filtration methods where possible. Urban greening, landscaping and other mitigation strategies within this green and blue infrastructure approach (see Policy 77 'Green Infrastructure and the Natural Environment') will also be strongly encouraged in new and existing development to minimise the impacts of flooding from multiple sources (including surface water, groundwater and watercourses). Development will also be expected to follow the drainage hierarchy to ensure off-site discharge rates meet greenfield runoff rates, utilising SuDS in particular. Maximising water storage capacity will help to alleviate the intensity of flood events by providing a greater volume for rainfall attenuation; a key strategy to increase long-term resiliency across the borough.

**Figure 18.2** Managing Flood Risk

**Key**

-  Flood Zone 2
-  Flood Zone 3



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**Policy 92****Overheating**

To avoid exacerbation of the Urban Heat Island (UHI) effect, improve micro-climate conditions, and provide thermally comfortable environments, overheating will be prevented by:

- A. Optimising the layout, orientation, materials, technology and design of new development to minimise any adverse impacts on internal and external temperature, reflection, overshadowing, micro-climate and wind movement;
- B. Ensuring major development proposals follow the cooling hierarchy in alignment with the London Plan, considering future climate change;
- C. Implementing adequate mitigation measures to minimise overheating, including landscaping, tree planting and the use of blue and green infrastructure; and
- D. Ensuring all major developments undertake dynamic overheating assessments in line with Chartered Institute of Building Services Engineers (CIBSE) Technical Memorandum 59 (TM59) or equivalent.

**18.28** Climate change will increase the severity and frequency of extreme heat events in the borough over the coming years. Where the Urban Heat Island will exacerbate these increased temperatures, Waltham Forest must seek to mitigate and adapt to increase its resiliency. This policy aims to address the issue of overheating, and this Plan will support development that utilises sustainable design and construction principles to help reduce internal and external temperatures and improve human comfort.

**18.29** To analyse their risk of overheating, new developments will be required to undertake overheating assessments in line with Chartered Institute of Building Services Engineers (CIBSE) guidance as set out in the GLA's guidance on preparing energy assessment guidance as part of planning applications. Development proposals should also adopt the London Plan's cooling hierarchy to mitigate overheating and avoid reliance on air conditioning systems. This cooling hierarchy includes measures such as passive ventilation, active low-carbon cooling systems, mechanical ventilation, energy efficient design, high ceilings, shading and green infrastructure, which can all serve to reduce internal temperatures. To reinforce this, new development will also be expected to provide appropriate mitigation measures to address overheating, and the Plan strongly encourages the use of blue and green infrastructure and urban greening as sustainable cooling options for both internal and external environments.

**Implementation**

**18.30** The main tools the Council has in delivering the policies in this section of the Plan are through the planning application process and allocation of sites in Local Plan Part 2 - Site Allocations. Other tools and initiatives available to support implementation include:

- The Waltham Forest Climate Action Plan;
- Relevant Mayoral Supplementary Planning Guidance;

- Chartered Institute of Building Services Engineers Knowledge and Research; and
- Retrofit and Residential Extensions, Developer Contributions, Exemplar Design and Green and Blue Places Supplementary Planning Documents (SPDs).

## Promoting Sustainable Waste Management

### Strategic Objective

Build Waltham Forest's resilience to climate change through addressing all aspects of sustainability, efficient waste management and the effects of climate change at all stages in the development process.

**19.1** As the borough's population grows it is expected that more waste will be generated. Waste management refers to the activities required to manage waste from its generation to its final disposal. Waste is produced by everybody in everyday life in London and in Waltham Forest. This includes individuals, households, businesses and organisations.

**19.2** Historically, waste management has involved the collection of waste and its subsequent transportation for disposal at landfill sites. These days, greater focus is placed on the environmental impacts of waste generation and the importance of using resources efficiently. Accordingly, there has been significant changes to waste management, as evidenced by the increasing opportunities for residents to separate waste prior to kerbside collections, efficient transportation of materials, use of advanced mechanical recycling facilities and even use of waste as a renewable energy source. The increased focus on the importance of management means that an appropriate network of waste management facilities must be planned for locally.

**19.3** The seven North London Boroughs, as Waste Planning Authorities (WPA), have prepared the North London Waste Plan (NLWP) which was adopted in Waltham Forest in March 2022. This requirement comes from Article 28 of the European Union (EU) Waste Framework Directive, the National Waste Management Plan for England and the National Planning Policy for Waste (NPPW). The partnership project involves the London Boroughs of Barnet, Camden, Enfield, Hackney, Haringey, Islington, and Waltham Forest.

**Policy 93****Waste Management**

Sustainable management of waste will be achieved by:

- A. Working in partnership with the North London Waste Authority (NLWA) and the North London Boroughs to meet the London Plan apportionment and recycling targets;
- B. Ensuring compliance with the policies set out in the adopted North London Waste Plan, in particular, to safeguard existing waste sites in Waltham Forest unless compensatory provision is made in the borough or sub-region which maximises waste capacity in line with the provisions of the North London Waste Plan;
- C. Promoting the prevention and reduction of waste produced in the borough, increasing the reuse of materials wherever possible, and seeking to increase recycling and composting of waste;
- D. Ensuring that new development, including changes of use, provides accessible, adequate and well designed internal and external storage facilities for residual waste and recycling, following the specification set out in borough's Waste and Recycling Guidance for Developers or any strategy that replaces this; and
- E. Ensuring that waste is minimised during construction of new developments, encouraging the use of sustainably sourced materials and requiring developments to make on-site provision for the recycling and reuse of construction and demolition waste.

**19.4** This policy must be read in conjunction with other policies of the Plan, including Policy 53 'Delivering High Quality Design', Policy 57 'Amenity', Policy 64 'Deliveries, Freight and Servicing' and Policy 87 'Sustainable Design and Construction'.

**19.5** The London Plan (2021) projects how much Local Authority Collected Waste (LACW) and Commercial and Industrial Waste (C&I) is likely to be generated in the capital over the next 20 years and apportions an amount of these two waste streams to each borough. The North London Boroughs have pooled their apportionment to meet this collectively through existing sites and land allocated in the [North London Waste Plan](#).



**19.6** The North London Waste Plan (NLWP) was adopted by Waltham Forest in March 2022. The Plan identifies a range of suitable sites/areas to meet the North London Boroughs' future waste management needs and thereby support increased self-sufficiency for London and better use of resources. It sets out a range of policies designed to support determination of planning applications for waste facilities and to ensure a more general and sustainable approach to waste and resource management.

**19.7** The NLWP plans for all principal waste streams including:

- Local Authority Collected Waste (LACW): Waste collected by a Local Authority, including household and trade waste;
- Commercial and Industrial (C&I): Waste produced by businesses and industry;
- Construction, Demolition & Excavation (CD&E): Waste generated as a result of delivering infrastructure projects, building, renovation and the maintenance of structures;
- Hazardous: A sub-category of all waste streams where the material produced is hazardous and requires specialist treatment;
- Agricultural Waste: Waste produced by farming and forestry activity;
- Waste Water / Sewage Sludge: Waste produced from washing, cleaning and hygienic activities to create waste water and sewage effluents; and
- Low Level Radioactive Waste (LLW): Waste associated with the undertaking of x-rays and laboratory testing using low level radioactive substances.

**19.8** As part of the North London Waste Authority, the Council will ensure that waste and refuse is dealt with sustainability and in alignment with the NLWP. This Plan will also ensure the protection and retention of existing waste sites as required in the London Plan.

**19.9** The NLWP contains policies covering the following issues:

- Existing waste management sites;
- Locations for new waste management facilities;
- Windfall sites;
- Re-use and recycling centres;
- Assessment criteria for waste management facilities and related development;
- Energy recovery and decentralised energy;
- Waste-water treatment works and sewage plant; and
- Control of inert waste.

**19.10** The NLWP forms part of the overarching planning framework used for the determination of planning applications relating to proposed or existing waste facilities in Waltham Forest and North London generally.

**19.11** The Council is committed to moving the management of waste up the 'waste hierarchy', reducing the amount of waste produced and increasing the reuse, recycling and composting, and converting waste to energy, with waste disposal only as a last resort.



### Provision of Waste Facilities in New Developments

**19.12** The Council publishes additional guidance for developers on the provision of waste and recycling facilities in new developments. This sets out the operational requirements and standards expected relating to the provision of external waste storage areas/spaces for dry recycling, food waste recycling, and measures to enable safe, regular and easy refuse collections and to alleviate traffic congestion. Further guidance will also be included in the Exemplar Design Supplementary Planning Document (SPD).

**19.13** The Council expects that due regard will be paid to the Mayor's Circular Economy Guidance in all new developments.

### Implementation

**19.14** The main tools the Council has in delivering the policies in this section of the Plan are through:

- The planning application process;
- The Exemplar Design Supplementary Planning Document (SPD) and other informal guidance for developers; and
- Ongoing work with the NLWP partner boroughs.

## Delivering the Plan

**20.1** This section provides an overview of the ways in which the Council will deliver and monitor the delivery of this Local Plan, including its Vision, Strategic Objectives and Policies, and how the Council will:

- Take forward and implement the overall spatial strategy and area based policies as set out;
- Make use, where appropriate, of the Council's planning powers and tools to support the delivery of sites allocated in Local Plan Part 2 - Site Allocations;
- Make use of Planning Obligations and the Community Infrastructure Levy (CIL) to mitigate development impacts and fund essential infrastructure;
- Take account of development viability, risk and contingency;
- Monitor the progress and success of the Plan; and
- If required, trigger a review of the Plan.

### Implementation

**20.2** The Local Plan sets out how the borough will develop over the Plan Period to 2035, including the planning policies and proposals that will help our vision become reality.

**20.3** The development management process will be key in the way which the Local Plan will be implemented. Both the overall spatial strategy and the detailed policies of the Local Plan will provide the starting point for the determination of planning applications, together with the National Planning Policy Framework (NPPF), the London Plan, Neighbourhood Plans, and any relevant Supplementary Planning Documents (SPDs), or other material considerations where relevant.

**20.4** The Local Plan therefore has an important role to play in influencing and providing a positive framework for planning and investment decisions. However, policies in isolation will not be sufficient to deliver this Plan – it is important that there are other tools in place to help the borough, its stakeholders and investment partners to implement them and to ensure the successful delivery of the overall spatial vision for Waltham Forest.

**20.5** The Council has a key place-shaping role to play and will make use of all appropriate mechanisms and assets, including:

- Producing more detailed guidance in the form of Supplementary Planning Documents (SPDs), Development Plan Documents (DPDs), masterplans or planning briefs to support community, landowners or developers with specific area-based regeneration and delivery, particularly where new development opportunities arise over the lifetime of the Plan;
- Proactive coordination of the borough's statutory and non-statutory functions, including (but not limited to) as the Local Planning Authority, Education Authority, Local Highways Authority, Lead Local Flood Authority, and Public Health Commissioner, supported by other key departments including Parks and Open Space, Community Safety, Air Quality and Place and Design, amongst others;

- Facilitating access to government grants and funding opportunities as they arise, and ensuring prudential borrowing;
- Strategically prioritise investment of the Council's Community Infrastructure Levy (CIL) and Carbon Offset Fund (COF);
- Effective and efficient use of Section 106 Agreements to secure affordable housing provision and mitigate the impacts of development at the local level, such as impacts on air quality;
- Working in partnership with other statutory delivery agencies (e.g. the Greater London Authority (GLA), Transport for London (TfL), NHS North East London, Utility companies including water, electric and gas, the Environment Agency (EA), Natural England, Sport England, etc) to ensure that essential infrastructure is provided;
- Working in a positive spirit of partnership with landowners and developers and other private sector organisations including existing Business Improvement Districts, Trader Associations and other business networks to secure deliverable development proposals and investments;
- Engaging with education and skills providers and other organisations to support skills and training initiatives in the borough;
- Use of funding and incentives available through opportunities like Housing Zones and Enterprise Zones;
- Efficient and effective application of Development Management, Enforcement and other regulatory functions;
- Use of the Council's Compulsory Purchase powers to assist with site assembly challenges where appropriate;
- Support for locally driven aspirations including Neighbourhood Planning, Assets of Community Value (ACV) and other local initiatives;
- Use of other funding sources and mechanisms such as Levelling Up Fund, Housing Infrastructure Fund, Good Growth Fund, National Heritage Lottery Fund, New Homes Bonus, Business Rates Retention, development incentives and other incentives as and when they arise; and
- Proactive use of the Council's assets to facilitate and assist delivery.

**20.6** In addition to the planning framework, the Council will progress the delivery and implementation of supporting regeneration delivery plans for various strategic growth areas and town centres.

## Local and National Funding

**20.7** One of the fundamental requirements for the successful delivery of this Plan will be the ability to leverage investment in key infrastructure to enable and support sustainable growth and development. There is a wide and continually evolving range of funding options that can be utilised to support growth, infrastructure delivery and environmental improvements. These include opportunities such as:

- Levelling Up Fund
- The Housing and Infrastructure Fund (HIF)
- The Mayor of London's Good Growth Fund
- Heritage Lottery Funding (HLF)

- GLA Green Capital Grants
- Housing Zone funding, such as that secured for Blackhorse Lane

**20.8** With regard to improvements in transport infrastructure, funding opportunities include:

- Local Implementation Plan (LIP) / Streetspace Fund
- Transport for London (TfL) Growth Fund
- TfL Step Free Programme
- TfL Liveable Neighbourhoods Fund
- Department for Transport (DfT) Access for All Programme
- Low Emissions Neighbourhood Fund
- Developer contributions

## Planning Obligations and Developer Contributions

**20.9** Development proposals will be expected to provide or make a contribution toward the cost of providing what is necessary to support the new development. Developer contributions are an important element towards meeting the cost of funding infrastructure and facilitating sustainable growth.

## Planning Obligations

**20.10** Planning Obligations, also known as Section 106 Agreements (Section 106 of the Town and Country Planning Act 1990 (as amended)), are binding legal agreements made between Local Authorities and developers and can be attached to a planning permission to make development proposals acceptable which would otherwise be unacceptable in planning terms. The land itself, rather than the person or organisation that develops the land, is bound by a Section 106 Agreement, something any future landowner will need to take into account.

**20.11** Planning Obligations are used for three principal purposes:

- **Prescribe** the nature of development (e.g. requiring a given proportion of housing to be affordable);
- **Compensate** for loss or damage arising from a development (e.g. loss of employment or open space); and/or
- **Mitigate** a development's impact (e.g. through increased public transport provision).

**20.12** Planning Obligations will be requested in accordance with Regulation 122 of the CIL Regulations 2010 (as amended) (or any successor regulations). Planning Obligations must be:

- Necessary to make the development acceptable in planning terms;
- Directly related to the development; and
- Fairly and reasonable related in scale and kind to the development.

**20.13** Where alterations or improvements to the public highway are required as part of a development proposal, developers will be required to enter into a Section 278 agreement (Section 278 of the Highway Act 1980).

**20.14** For cases where a highway scheme requires developers to offer up land within their control for adoption as public highway, a developer may complete the construction of a road and then offer it to the Highway Authority under Section 37 of the Highways Act 1980; however Section 38 is more desirable due to the fact that the Council has no power to insist that the road is constructed to an adoptable standard, or that it will then be offered up for adoption. If a Section 38 agreement is made before construction starts, the Council can ensure that it is built to the appropriate standard, including being lit and drained.

### **Community Infrastructure Levy (CIL)**

**20.15** The Community Infrastructure Levy (CIL) came into force in April 2010 and allows authorities to raise funds from new development in their area. The CIL is payable based on the type and use of the floor space proposed and provides a standardised method for calculating contributions.

**20.16** CIL must be spent on infrastructure, as defined by the Planning Act 2008, including roads and other transport facilities, flood defences, schools and other educational facilities, medical facilities, sporting and recreational facilities and open spaces. This is broadly the definition of types of infrastructure the Local Plan makes provision for, as set out in detail in the Infrastructure Delivery Plan (IDP).

**20.17** The borough adopted a CIL charging schedule in May 2014. CIL receipts contribute towards strategic infrastructure to support the overall development, growth and regeneration of Waltham Forest. From December 2020, Councils are required to publish an Annual Infrastructure Funding Statement (IFS) which provides an overview of Section 106 and CIL for the previous year (collection and spend) and an overview of the infrastructure priorities and projects or types of projects that the Council intends to fund by CIL. This replaces the previous requirement to publish a Regulation 123 List. The IFS also requires the creation of a strategic priority programme list of projects, known as an Infrastructure List. This requirement will be fulfilled through regular engagement with stakeholders and updating of the Council's Infrastructure Delivery Plan (IDP).

**20.18** Development will not be double charged for Infrastructure via both CIL and planning obligations. Planning obligations will continue to make individual development proposals acceptable in planning terms. Affordable housing will continue to be delivered through planning obligations rather than by CIL. The Council will also continue to pool contributions for measures that cannot be funded through CIL (e.g. non-infrastructure items such as contributions towards Employment and skills provision).

**20.19** The Council notes the Government's proposals to merge the existing Community Infrastructure Levy (CIL) and Section 106 Planning Obligations to create a new Infrastructure Levy, with any payments due under the new system linked to the final value of a development. The Council is committed to securing maximum investment leverage in the borough's infrastructure and will work proactively with regard to any future successor regulations as enacted by Parliament throughout the lifespan of the Plan.

## Policy 94

### Infrastructure and Developer Contributions

- A. The Local Planning Authority will support development proposals that provide adequate contributions towards:
- i. Measures to directly mitigate their impact and make them acceptable in planning terms; and
  - ii. Physical, social and community, green and transport infrastructure to meet the needs associated with the development.
- B. Development proposals will be required to test the quality and capacity of existing infrastructure, in partnership with the Council and other infrastructure and service delivery stakeholders as necessary, and make contributions to support the timely provision of improvements and/or additional capacity.
- C. Infrastructure provision or enhancements should be provided on-site as an integral part of a development wherever possible and appropriate.
- D. Where on-site provision is not possible nor the most appropriate means by which to secure the timely and most efficient delivery of such enhancements or provision, planning obligations will be required to secure a financial contributions to meet the reasonable costs of provision to support the development or offset its impact.
- E. Where it is necessary to seek planning contributions to make particular development acceptable in planning terms, they will be secured via a legal agreement and in addition to any applicable CIL charges.

### Planning Obligations

- F. Planning Obligations will be sought in line with Regulation 122 of the Community Infrastructure Levy Regulation 2010 (as amended) or successor regulations and guidance. The Council will also require pooled contributions for measures that cannot be funded through CIL, as set out in the Council's Developer Contributions Supplementary Planning Document (SPD).
- G. Development proposals that do not suitably mitigate their impacts will not be supported.

### Community Infrastructure Levy (CIL)

- H. All liable development proposals will be required to pay the Community Infrastructure Levy (CIL) in accordance with the borough's Adopted CIL Charging Schedule.
- I. All liable development proposals will be required to pay the Mayoral Community Infrastructure Levy (MCIL) in accordance with the Mayor of London's Adopted MCIL Charging Schedule.

## Planning Conditions

**20.20** Where appropriate, rather than refuse a planning application, the Local Planning Authority may grant permission subject to conditions. Such conditions will normally be in relation to:

- Details that need to be confirmed before the permission can be implemented, known as pre-commencement conditions (e.g. approval of materials to be used);
- Restrictions on the work needed to implement the permission (e.g. the hours in which vehicles can access the construction site); and
- Restrictions on the use or operation of the development once complete (e.g. any subsequent change of use).

**20.21** The Local Planning Authority is required to give reasons for the conditions when a decision is issued. The Local Planning Authority encourages applicants to undertake early consultation with officers prior to the application being submitted as it may be possible to broadly agree the nature of conditions that officers, or the planning committee are likely to impose.

**20.22** If an applicant wishes to contest the imposition of a planning condition, they can appeal to the Secretary of State. In addition, Section 73 of the Town and Country Planning Act 1990 'determination of applications to develop land without conditions previously attached' permits applications to remove planning conditions or to vary planning conditions following the grant of planning permission.

## Infrastructure Delivery Plan

**20.23** The Local Plan is supported by a regularly updated Infrastructure Delivery Plan (IDP). The purpose of the IDP is to set out:

- What infrastructure is required to support growth;
- Where it is required;
- When it is required;
- How much it costs;
- How it is to be funded; and
- Who is responsible for its delivery.

**20.24** The IDP and any supporting infrastructure delivery analysis should be considered a 'live document' and will be updated regularly to ensure progress is measured and ensure funding, initiatives and actions are appropriately targeted.

## Viability and Contingency

**20.25** The Council and its stakeholders recognise that the housing and commercial property markets are inherently cyclical and that this Plan has been prepared at a time when the market has experienced a period of sustained economic and value growth, albeit with a decreasing level of confidence and certainty in the wider London and national economy arising from the departure of the UK from the European Union.

**20.26** This Plan is supported by a Whole Plan Viability Study. Planning Policy Guidance mentions that where up-to-date policies have set out the contributions expected from development, planning applications that fully comply with them should be assumed to be viable and the applicant will need to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage.

## Risk and Contingencies

**20.27** The Council will strive to ensure the comprehensive delivery of the Strategic Vision and Objectives of the Local Plan and the policies contained within it. Presently, the Council has no reason to believe that the Plan will not be implemented in full. However, the Council accepts that there could be circumstances where development fails to come forward for a number of reasons, whether that be delivery challenges on a site by site basis or due to a more general slowdown in the market and its ability to deliver viable development and regeneration – some of which is beyond the control of the Council. Where the Council is able to use its powers and influence to enable or support delivery of the Local Plan, it will proactively consider the case for doing so.

**20.28** 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.

**20.29** In addition to annual performance monitoring through the AMR, at the end of 5 years after the adoption of the Local Plan, the Council in conjunction with its stakeholders will undertake a comprehensive analysis of the cumulative housing, employment and infrastructure delivery to date in the borough. If delivery is lagging significantly behind the projected cumulative target for the period or delivery is not being supported or guided by the policies of the plan, the Council will undertake a review of the Local Plan and its implementation mechanisms to create a conducive environment for key sites to come forward for delivery.

## Monitoring Strategy and the Authority Monitoring Report

**20.30** The Local Plan sets out how the borough will develop over the Plan Period to 2033, identifying where the homes, jobs, services and infrastructure will be delivered and the type of distinctive places and environments that we want to see created.



**20.31** Monitoring allows us to understand whether policies have worked as intended. It enables decisions to be taken that are well informed and grounded in an understanding of the effectiveness of policy based on evidence.

**20.32** Monitoring the impact of the Plan is crucial to the successful delivery of our current Plan and to inform the development of any future development plan for the borough. Statutorily, under Section 113 of the Localism Act 2011 and Section 35 of the Planning and Compulsory Purchase Act 2004, each year the Council must produce reports which assess the implementation of the Waltham Forest Local Plan and the extent to which its policies and targets are being achieved.

**20.33** 'Appendix 3 - Monitoring Indicators and Targets' sets out the performance indicators and targets by which the progress of this plan will be monitored. In monitoring outcomes, a proactive approach will be used. 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.

**20.34** Some of the indicators that have been included will be influenced by many factors and not just the Local Plan, but they still provide a useful way of monitoring the overall outcomes that the document is seeking to help the borough achieve. For some policies, quantitative indicators will not be appropriate, and the main focus will be on monitoring whether there have been any significant challenges with implementing the policies through the development management process, for example because of a change in circumstances. For other policies, it will be important to monitor key projects that will help deliver those policies, not all of which will be specifically mentioned in the Local Plan. It will also be important to monitor the wider policy context, to ensure the Local Plan remains consistent and in conformity to the London Plan, national policy and other key plans and strategies which influence growth and development in the borough.

**20.35** If, as a result of monitoring, issues are identified in terms of a policy not achieving its intended outcome, or key policy and delivery targets are not being met, this may give rise to or trigger a review of the Local Plan and the policies contained therein (see Policy 95 'Monitoring Growth Targets').

## **Managing Supply of Housing Land**

**20.36** 'Appendix 3 - Monitoring Indicators and Targets' of this Plan sets out further details for monitoring delivery of the borough's housing requirement. As this Plan proposes a stepped housing trajectory, the housing land supply position will be calculated with reference to the proposed requirements for each year. The position will be confirmed by an annual statement in the AMR.

## Managing a Supply of Housing and the Housing Delivery Test (HDT)

**20.37** The HDT compares the net homes delivered over the preceding three years to the homes that should have built over the same period. Full details of the methodology are set out in the HDT Measurement Rule Book.<sup>(82)</sup>

**20.38** The outcome of the HDT is published annually by Government in November, and if delivery falls below 95% of the requirement, Local Authorities are expected to produce a Housing Delivery Test Action Plan by April. The position in the previous test and the expected outcome of the forthcoming test will be set out in the AMR.

## Reviewing the Local Plan

**20.39** As required by the National Planning Policy Framework and Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012, the Local Planning Authority will initiate a full review of the Plan within 5 years of adoption. The purpose of the review is to ensure the borough's development frameworks take account of changing circumstances affecting the area, or any relevant changes in national planning or plan making policy. Relevant strategic policies will need updating at least once every five years if the borough's local housing need figure has changed significantly or is expected to change significantly in the near future.

**20.40** As part of the overall Monitoring Strategy, the Council will monitor progress towards the achievement of key growth targets as set out in Policy 95 'Monitoring Growth Targets'. Monitoring is required to ensure that the policies set out in the Plan are relevant and effective. Regular monitoring will include analysis of delivery data and trends, take account of changes in legislation at the sub-regional and national level and reviewing the Plan's supporting evidence base where necessary. Monitoring progress against targets also provides a basis to trigger a whole or partial review of the Plan, policies, strategies or actions to reflect changing circumstances.

**20.41** Policy 95 'Monitoring Growth Targets' ensures that a Plan review would be triggered in the unlikely event that traffic levels in the vicinity of the Epping Forest Special Area of Conservation (SAC) increase as a result of the planned growth in Waltham Forest. This will be established through Travel Plans, required by Policy 63 'Development and Transport Impacts', and secured by planning condition, which will require a Trip Rate Information Computer System (TRICS) Standard Assessment Methodology (SAM) survey (as utilised within Air Quality Study 2 (AQS2)) within the 1st, 3rd and 5th years of occupation of development. Through the monitoring process the Council will review them against both the submitted Transport Assessment and AQS2 data and any site that generates vehicle trips in excess of AQS2 levels will trigger a review of distribution to/from the site to assess any potential impacts within 200m of the Epping Forest SAC.

**20.42** Policy 81 'Epping Forest and the Epping Forest Special Area of Conservation' requires investment in Suitable Alternative Natural Greenspaces (SANGs) across the borough in order to avoid recreational pressures on the Epping Forest Special Area of Conservation (SAC),

82 [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/728523/HDT\\_Measurement\\_Rule\\_Book.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728523/HDT_Measurement_Rule_Book.pdf)

and financial contributions to the joint Strategic Access Maintenance and Management (SAMM) Strategy to be invested in the SAC in order to mitigate recreational pressures. The SANG Strategy contains a comprehensive suite of monitoring indicators to ensure its effective and successful implementation. These are captured in 'Appendix 3 - Monitoring Indicators and Targets' of this Plan. The Technical Oversight Group of SAMM partnership authorities will monitor the effective implementation of the SAMM Strategy with Natural England and the City of London Corporation as Conservators of Epping Forest.

**20.43** Natural England, along with the Conservators of Epping Forest, are also obliged to carry out condition surveys of the Epping Forest SAC and would notify the competent authorities of the findings from these, including any further deterioration in quality.

**20.44** Policy 95 'Monitoring Growth Targets' ensures that a Plan review would be triggered in the unlikely event that these measures are unsuccessful and Likely Significant Effects do occur in the SAC as a result of recreational pressures arising from planned growth in Waltham Forest. In order to capture this, the trigger is phased. It would be implemented if monitoring showed that the visitor uplift required in SANGs across the borough to avoid recreational harm (as set out in the SANG Strategy) was not met over a rolling three-year period. As this would indicate that harmful pressure could be being placed on the forest, it would be followed by a Council-led visitor survey and condition survey of the SAC to ascertain whether there has been an increase in visitors from Waltham Forest, and whether any harm has been caused to qualifying features and species as a result of related increased recreational pressure.

**20.45** Table 3.3 within 'Appendix 3 - Monitoring Indicators and Targets' of this Local Plan sets out further details for monitoring and delivery of the borough's requirement for industrial land. The Council is committed to sharing this monitoring information with the GLA to support decision making when considering proposals which affect industrial designations and in particular any which affect SIL. Monitoring of the borough's industrial capacity will help to ensure that industrial need is identified, reviewed and met ahead of any planned release. It will help facilitate the effective operation of the Plan's industrial policies.

## Policy 95

### Monitoring Growth Targets

The Council will monitor progress towards the achievement of the key targets for growth (housing, including affordable housing, employment space and retail) annually as part of the Council Authority Monitoring Report (AMR). In the event that delivery falls significantly behind that which is required to achieve these targets, the Council will trigger a full or partial review of the Plan in order to address the reason(s) for underdelivery. Key indicators that would trigger a full or partial review are:

- A. Failure to demonstrate a 5-year housing land supply in any monitoring year with the following 2 monitoring years indicating no recovery in the position;
- B. Housing completions fall more than 15% beneath the targets in the housing trajectory over any rolling 3-year period;
- C. The delivery of employment space falls more than 20% beneath the target over any rolling 3-year period;
- D. A reduction of more than 20% in retail space in designated centres over a 3-year period;
- E. A failure to meet the visitor uplift in identified Suitable Alternative Natural Greenspaces (SANGs) necessary to accommodate the new homes delivered<sup>(83)</sup> followed by an Epping Forest Condition Survey and visitor survey in the Special Area of Conservation (SAC) that demonstrates deterioration in the condition of the SAC resulting from recreational pressure; and
- F. Harm to the Epping Forest SAC arising from traffic growth, based on the number of trips to/from a development site compared with the level set out in the submitted Transport Assessment and Air Quality Study 2.

83 Calculated according to the methodology established in the SANG Strategy

## Appendix 1 - Parking Standards

### Cycle Parking Standards

**21.1** The London Borough of Waltham Forest (LBWF) is proud of its commitment to ensuring everyone in the borough can choose to walk and cycle. In recent years LBWF has successfully encouraged a modal shift to sustainable transport, working with developers to make the most of opportunities to meet London-wide targets for walking, cycling and public transport use. A significant way of facilitating a modal shift to cycling is by providing appropriate levels of cycle parking which are fit for purpose, secure and well located. Appropriate levels of cycle parking should accommodate current existing demand and also future growth in cycle use. New developments or developments undergoing a change in use should provide cycle parking in accordance with LBWF's minimum standards set out in Table 1, and should be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards (LCDS) and London Plan guidance on Parking Design and Management.

**21.2** The London Plan Policy T5 'Cycling' states that: "Development proposals should remove barriers to active travel and by creating healthy environments to encourage people to choose cycling and walking for more of their journeys. Development plans must ensure fit for purpose, accessible and secure cycle parking is delivered for all people visiting, as well as living and working in the borough".

**21.3** The London Borough of Waltham Forest Local Implementation Plan 3 (LIP3) (2019), Objective 1.6, states that: "Every resident and visitor has somewhere to keep their cycle: To complement the borough-wide cycle network, the Council seeks to deliver fit for purpose, accessible and secure cycle parking for all people who live and work in the borough, located at all destinations across the borough, including residential streets, stations, town centres and shopping areas, and new developments".

### LBWF Minimum Standards

**21.4** All cycle parking standards are minimum standards and relate to Gross Floor Area (GFA), unless otherwise indicated. The LCDS states that the right amount of cycle parking for a site or area would be at a level that:

- Meets existing baseline demand;
- Meets the potential demand generated by the existing and proposed land uses in the area; and
- Ensures there further is allowance for spare capacity (ideally, at least 20 per cent).

**21.5** In the LCDS, a space refers to a space for one cycle. For example, a 'Sheffield' type stand can accommodate two bicycles and at least 1.4 square metres must be provided per stand; so if the standards for a particular development requires 200 spaces, and Sheffield Stands are considered the appropriate type of cycle parking, then a minimum of 100 Sheffield Stands must be installed utilising 140 square metres. Further information about other types, as well as locations, of cycle parking is provided towards the end of this section.

**21.6** Flexibility may be applied to applications where it can be demonstrated that strict adherence to the standards for a multi-purpose site will result in a duplication of provision.

**21.7** Development proposals for land uses not covered in the standards will be considered on a case by case basis, with the presumption that all new developments should provide for high levels of cycle parking. Existing developments which have too little or no cycle parking are encouraged to meet these standards, both to help meet the ambitions of the borough to support the continued modal shift to sustainable transport, and as a selling point.

**21.8** The London Plan outlines standards, which differ between Inner and Outer London boroughs, however Local Authorities are encouraged to adopt higher minimum standards for areas where there is high or opportunity for increasing cycling mode share, such as that realised by Waltham Forest's Enjoy Waltham Forest (Mini Holland) programme. The minimum standards for short-stay (for visitor/customer) cycle parking for retail and services uses and long stay cycle parking (for employees) for office use in the boroughs identified in Table 1 are thus set at twice the level as elsewhere – though the Mayor will support other boroughs adopting these higher standards for defined areas through their Development Plan documents (such as existing Mini-Hollands, and Liveable Neighbourhoods or Opportunity Areas). The minimum standards in Waltham Forest are therefore set ambitiously for the entire borough across Use Classes.

**21.9** Use of cycle parking should be monitored and if demand appears to be exceeding supply provision should be increased, as part of a Travel Plan (TP) where appropriate. The TP should also outline the behavior change strategy for increasing use of cycle parking provision, particularly in car dominated areas.

**21.10** Reference to staff in the standards below means the peak number of staff expected to be on-site at any one time.

Table 1: Minimum Cycle Parking Standards

Use Class	Description	Suggested Cycle Parking Standards (2020)	
		Long Stay	Short Stay
<b>RETAIL AND SERVICES</b>			
E(a), F2(a)	Food Retail	From a threshold of 100 sqm:  1 space per 175 sqm gross external area (GEA)	From a threshold of 100 sqm: Mini Holland areas:  First 750 sqm: 1 space per 20 sqm; thereafter: 1 space per 150 sqm (GEA)  Rest of borough:  First 750 sqm: 1 space per 40 sqm; thereafter: 1 space per 300 sqm (GEA)
E(a)	Non-food Retail	From a threshold of 100 sqm:  First 1000 sqm: 1 space per 250 sqm; thereafter: 1 space per 1000 sqm (GEA)	From a threshold of 100 sqm: first 1000 sqm: 1 space per 125 sqm; thereafter: 1 space per 1000 sqm (GEA)
E(c)	Financial Services, Professional Services, Other appropriate services in a commercial, business or service locality	From a threshold of 100 sqm: 1 space per 175 sqm (GEA)	From a threshold of 100 sqm: Mini Holland areas: 1 space per 20 sqm (GEA) Rest of borough: 1 space per 40 sqm (GEA)
E(b)	Sale of food and drink for consumption (mostly) on the premises		
Sui Generis	Public houses and wine bars		
Sui Generis	Takeaways		
Sui Generis	Taxi/mini cab offices	No standard. To be considered individually.	
<b>BUSINESS</b>			

E(g)	Offices Research and development, light industry	1 space per 50 sqm (GEA)	1 space per 500 sqm (GEA) for visitors with minimum 2 spaces
B2 and B8	General industry Storage and Distribution	B2: 1 space per 75 sqm (GEA) B8: 1 space per 250 sqm (GEA)	1 space per 1000 sqm (GEA)
<b>RESIDENTIAL</b>			
C3	Flats and houses	1 space per studio; 1.5 spaces per 1 bedroom home; 2 spaces per 2 bedrooms home; 3 spaces per all other dwellings	1 space per 40 homes for visitors with minimum 2 spaces
<b>OTHER RESIDENTIAL</b>			
SG	Hostels	1 space per 2 resident bedspaces	1 space per 20 bedspaces with minimum 2 spaces
SG	Houses in multiple occupation (HMOs)	1 space per habitable room	
C1	Hotels (20 beds and over) and motels	2 spaces per 3 staff	1 space per 10 bedrooms
C1	Guest houses and small hotels (less than 20 rooms)	1 space per 3 staff	1 space per 3 bedrooms
C2	Boarding schools/and residential colleges	1 space per student	
	Student halls of residence	1 space per student	1 space per 10 bedspaces for visitors
C2	Children's homes, retirement and nursing homes	1 space per 2 staff	1 space per 20 bedrooms
C3	Sheltered housing	1 space per 2 staff	1 space per 4 homes
<b>EDUCATION AND HEALTH</b>			
E(e)	Hospitals	2 spaces per three staff	1 space per three bedspaces
E(e)	Day centres	1 space per 2 staff	1 space per 100 sqm (GEA)



F1(a)	Adult training centres (Universities and Colleges in London Plan)	2 space per 3 FTE staff + 1 space per 10 FTE students	1 space per 7 FTE students
F1(a)	Higher/further education establishments (vocational and academic) / (Secondary schools / sixth form colleges in London Plan)	1 space per 4 staff + 1 space per 3 peak time students	1 space per 100 students
E(f)	Pre-school, play and nursery provision	1 space per 8 FTE staff + 1 space per 8 students	1 space per 8 FTE staff + 1 space per 8 students
F1(a)	Schools (day): Nursery, Primary, Secondary, Special	1 space per 4 staff + 1 space per 4 students	1 space per 100 students
E(e)	Medical (and other health) clinics, including dental and veterinary	1 space per 2 staff	1 space per 3 staff with a minimum of 2 spaces
<b>LEISURE</b>			
F1(f)	Places of worship	1 space per 4 staff	1 space per 10 staff for visitors
F2(b)	Community centres		
Sui Generis	Cinemas		1 space per 5 seats
E(d) and F2(c)	Sports facilities with or without a licensed club house	1 space per 3 staff	1 space per 3 peak time visitors
F2 (d)	Swimming pools		
Sui Generis	Theatres	1 space per 4 staff	1 space per 5 seats
Sui Generis	Nightclubs	To be considered individually.	
<b>TRANSPORT</b>			
	Train stations	To be considered on a case by case basis through liaison with TfL. The level of provision should take into account the type and location of the station, current and future rail and cycle	To be considered on a case by case basis through liaison with TfL. The level of provision should take into account the type and location of the station,

		<p>demand and the potential for journey stages to and from the station to be made by cycle. Future growth, though a step-change in provision is expected, especially at termini, in order to meet the Mayor's mode share target.</p>	<p>current and future rail and cycle demand and the potential for journey stages to and from the station to be made by cycle. Future growth, though a step-change in provision is expected, especially at termini, in order to meet the Mayor's mode share target.</p>
	<p>Bus stations</p>		<p>To be considered on a case-by-case basis through liaison with TfL.</p>

## Types and Location of Cycle Parking Provision

**21.11** There is a wide range of cycle parking racks available, and the Council does not wish to be too prescriptive. However, 'butterfly' type racks, or concrete blocks, which simply grip one or both wheels and do not allow the frame to be locked, are inadequate from a practical and security point of view and will not be acceptable. Vertical racks pose a safety hazard and are inaccessible for many users, so these will not be acceptable.

**21.12** For short-term parking (e.g. outside shops, services etc.) the preferred type is the 'Sheffield' stand or a variation of it, which supports the bicycle and allows the frame and both wheels to be locked to a fixed bar. Such racks/stands should be securely fixed to the ground. For longer term cycle parking, and where security is a particular issue, a range of cycle lockers, sheds and shelters are available which offer a greater level of security. Two-tier stands, while space efficient, are not suitable for all users and all types of cycle. They should therefore be used in conjunction with other types of stand, with signposting to more accessible stands as necessary. Guidance on the spacing of different types of cycle parking can be found in the London Cycling Design Standards (LCDS).

**21.13** Sheffield stands, two-tier racks and secure lockers should be used in longer term parking according to the following ratios and should be spread equitably across all blocks within a development:

- **Two-tier:** Maximum 65%
- **Sheffield stands:** Minimum 30%
- **Secure lockers:** Recommended 2%
- **Cargo bike:** Minimum 5%

**21.14** Cycle parking should be located as close as possible to the main entrance(s) to the building it serves without obstructing pedestrians, and easily accessible from the highway/site entrance, by dropped kerb where necessary. Cycle parking should be clearly signed, in a prominent position visible from the building and/or security lodge, well lit and covered by natural surveillance or CCTV. Cycle parking should ideally be under cover, particularly that used for longer periods such as school/college/workplace and station parking.

**21.15** All cycle parking is required to support safe movement between cycles, pedestrians and motor vehicles. In a street environment, cycle stands should be located in space taken from the carriageway wherever possible, inset or with island protection as necessary. This requires a Traffic Order and needs careful planning and consultation in relation to potential loss of car parking or carriageway space, but it is the best way to avoid taking up footway space and creating conditions that require mitigation for visually impaired people. It can work especially well in streets where access is closed or restricted for motorised vehicles (<http://content.tfl.gov.uk/lcds-chapter8-cycleparking.pdf>).

**21.16** For new build developments, cycle parking should be incorporated into the design of the building from the outset and not be seen as an 'add-on' at the end. New developments must overcome the barriers to cycling for their prospective residents and for visitors wherever possible. Good quality cycle parking will attract new buyers, occupiers and customers.

**21.17** For residential purposes, cycle parking should be within an accessible, covered and lockable enclosure. Ideally a proportion of cycle parking should include secure lockers as a preventative measure against cycle thefts. For individual houses cycle parking could be in the form of a shed or garage. For flats or student accommodation either individual lockers or cycle stands within a lockable, covered enclosure are required. The cycle parking should be easily accessible and convenient to use.

**21.18** In large developments, the cycle parking facility should be covered. Sheffield stands are usually fit for purpose for this use. Where cycle parking for staff and visitors is mentioned, the long-stay parking for staff should ideally be separate and in a more secure and covered location than that for visitors.

**21.19** In addition, employers and educational establishments are encouraged to provide showers, lockers, changing and drying room facilities for long-stay cycle users, and any other appropriate support to encourage employees/students to cycle to work.

**21.20** Details on the design and spacing of cycle parking can be found in Transport for London's London Cycling Design Standards.

**21.21** Further details on cycle parking standards, design and requirements will be included in the Council's forthcoming Sustainable Transport SPD.

### **Car Parking Standards**

**21.22** The car parking standards set out below support the Council's aspirations to significantly reduce the levels of private car travel within the borough and deliver health and environmental benefits for residents and visitors. The standards are intended to assist in achieving:

- The London Mayor's Transport Strategy target of 80% of trips being made by sustainable modes (walking, cycling and public transport) in London by 2041.
- The targets set in the Local Implementation Plan 3 (LIP3), approved by the Mayor in April 2019, to reduce levels of car use and ownership in Waltham Forest by 12% by 2041, while increasing levels of walking, cycling and public transport by 55%.
- The reduction in CO<sub>2</sub> emissions required following the declaration in February 2019 of a Climate Emergency within Waltham Forest.

**21.23** The standards set out below define the maximum requirements and apply to car parking for residents, staff and visitors (including operational parking). As a general principle, the Council will seek to encourage parking provision below the maximum figures stated in the Tables below. In determining appropriate provision, the Council will take into consideration relevant local factors including access to opportunities and services, access to public transport, car clubs, design and location. The following parking standards should be read in conjunction with Policy 66 'Managing Vehicle Traffic'.

**21.24** In terms of residential development, all planning applications in the borough will potentially be subject to car free or car capped legal agreements. Residents of such developments will not be permitted to purchase parking permits for any Controlled Parking Zone (CPZ) in the local area.

**21.25** In locations where a CPZ already exists in the local area, a car free or car capped condition will be attached to the planning consent for all residential schemes, preventing the occupiers from obtaining parking permits.

**21.26** In locations where no CPZ is in place at the time of planning consent, residents in the immediate vicinity of the consented development will be given the opportunity to decide whether a CPZ should be introduced prior to occupation of the development.

**21.27** The boundary of the area to be subject to such consultation will be set taking account of the local geography but it will not extend to a distance exceeding 200 metres from the red line boundary of the site.

**21.28** Should a 51% majority of the residents responding to the consultation indicate the preference for a CPZ, this will be implemented prior to occupation of the development. The car free or car capped condition will then be confirmed, and the new occupiers will not be able to obtain parking permits. If the residents vote not to introduce a CPZ, then no car free or car capped restriction will be imposed.

### Clarification of Terms

**21.29** Floor space definition: The reference to floor space in all cases is to the gross floor area (i.e. including the thickness of external walls).

**21.30** Multiple land uses: Where several land uses are included within a scheme, the parking requirement is calculated separately for each use. However, dual use of parking facilities will be encouraged where possible (see below for dual use).

**21.31** Ancillary floor space (e.g. canteen space within a factory): Is subject to the standard for the main use.

**21.32** Absence of a standard: The standards set out below do not cover all land uses. Where there is no defined standard for a particular land use, the Council should be consulted before submission of a planning application to determine the maximum parking standards appropriate to the development purpose. Proposals for uses not dealt with below will be assessed in relation to relevant factors such as the nature of use, capacity of the premises (i.e. in terms of the numbers of people using the building), servicing requirements, access to public transport and car club provision, the character of the surrounding area, likely hours of use, and the availability of other car parking facilities nearby.

**21.33** Dual use: The Council encourages designs which promote efficient/multiple use of parking facilities (i.e. the use by different sections of the community at different times of the day). In such cases, the Council expects that the overall combined provision will be reduced. A car parking management plan should be secured with developments to ensure the efficient and appropriate use of dual use parking provision.

**21.34** Provision for disabled people: Development will need to have due regard to requirements of disabled people. For new dwellings (C3), the number of off-street disabled parking spaces to be provided must be a minimum of 5% of the total number of dwellings in the development. In addition, passive provision is to be made to add a further 2% (making 7% in all) to be brought into use at such time as these additional spaces are required in the future. All parking spaces for disabled people must be located off the public highway. Satisfying the requirement for disabled parking by designating any spaces on the adjacent public highway will not be permitted. All disabled parking spaces are to have wheelchair transfer zones on both sides of the space. Disabled spaces are to be used exclusively by Blue Badge holders occupying wheelchair homes in the development. They must not be sold off or leased for the use of other residents. In larger public buildings, a number of spaces should be wide enough to accommodate mini-buses/community transport/dial-a-ride vehicles.

**21.35** Servicing and delivery arrangements: For use classes which require loading, unloading and refuse collection facilities, the provision of separate off-street areas for servicing within the confines of each site will normally be required, in addition to the car parking provision referred to in the following schedule. Servicing and delivery facilities need to be designed to not impede road safety and to minimise conflicts with other street activities in particular pedestrian and cycle movement. For medium and larger sites, a Servicing and Delivery Plan will be required. In instances where a new loading bay is agreed on public highway, this cannot be reserved for a particular address or use. Any restrictions agreed on public highway must be designed in accordance with the Traffic Signs Regulations and General Direction 2016, as amended.

**21.36** Refuse collection: Residential developments will need to allow for maximum carrying distance of 25 metres (82ft) for refuse sack collection and a maximum level pushing distance for paladins of 9 metres (30ft). Where these conditions cannot be achieved in relation to a vehicle standing on the public highway, the vehicle will need to enter and turn around within the site in accordance with arrangements which satisfy the Council.

**21.37** Coach traffic and emergency service vehicles: Uses likely to generate coach traffic (e.g. theatres, public halls, hotels, swimming pools, sports grounds and some educational establishments) should be able to draw upon adequate facilities for the satisfactory dropping off and picking up of passengers, including the manoeuvring of vehicles without the need for reversing. Similarly, land uses which are likely to be visited frequently by emergency service vehicles (e.g. residential homes) should include adequate arrangements for access and manoeuvre.

**21.38** Car park/off-street parking design: Planning applications must show how car parking spaces are to be accommodated. Spaces should be arranged for convenient entry and exit close to and accessible to the development served. In communal parking areas, sufficient manoeuvring space for vehicles to enter and exit the site in forward gear should be provided. Large unbroken expanses of surface parking are unattractive, represent a poor use of available land and can attract anti-social behaviour. To overcome this, surface car parks should be designed with driver and pedestrian safety in mind (preferably overlooked), well lit, suitably screened and landscaped. Appropriate Car Park Design Standards should be used. The Council will require the use of permeable/pervious paving as this helps manage run-off in extreme weather. A Car Park Management Plan will be required, demonstrating how spaces

will be allocated and managed, especially for Blue Badge holders. It should also include details of operations and enforcement, to ensure that additional parking does not occur outside of the designated areas. Parking spaces must not be sold or leased to individual properties but be allocated on an annual basis to Blue Badge holders only.

**21.39** Parking in front gardens: The most pleasant street environments are leafy and tree-lined with clear definition between private and public realm. Removing plants and front garden walls to enable front garden parking can reduce the quality of the street. The conversion of front gardens into car parking areas can have negative visual impacts and adverse consequences for the local environment. When the Council considers applications for dropped kerbs for existing properties the following is considered:

- Impacts on traffic and road safety, particularly walking and cycling;
- Impacts on any planned schemes;
- All new crossover applications have to comply with the GPDO guidance for the front gardens;
- Guidance on the permeable surfacing of front gardens; and
- Loss of verges or similar amenity more than 3m wide.

The Council therefore discourages the use of front gardens for parking. Front garden parking may be permitted if applicants can meet the criteria for vehicle crossovers set out by Highways and demonstrate to the Council's satisfaction that the negative impacts can be mitigated and that gardens are large enough to allow cars to be parked at right angles to the road, without obstructing the pavements or pedestrian access to the house itself and without detracting from the building's setting and the character of the surrounding area. Existing walls, hedges and trees should be retained. Off-street parking may not be permitted where deemed to have a negative impact on parking provision in the street.

**21.40** Dwelling conversions and parking: The conversion of dwellings into self-contained flats and bedsits has contributed to additional pressure on residents' on-street parking. Applications for conversions need to demonstrate that they will not put undue pressure on local on-street parking.

**21.41** Miscellaneous: Residential staff in residential care premises and non-residential developments will need to have parking provision made for them in accordance with the appropriate residential standard (except where otherwise stated). The parking spaces related to non-resident staff needs will normally be assessed on the maximum number of (non-ancillary) staff likely to be present at any one time. Staff cycle parking requirements will also need to be met.

**21.42** Electric vehicle charging bays: 20% of off-road parking spaces associated with new development are required to provide charging facilities for electric vehicles. The remaining 80% are required to have passive provision for electric vehicles (e.g. infrastructure ducts for wiring) so that charging facilities can easily be added in the future.

**21.43** All parking requirements which result in part of one space being necessary will be rounded down to the next whole number.

Table 2: Car Parking Standards for Residential Uses

Type of Development	Low PTAL (1-2)	Medium PTAL (3-4)	High PTAL (5-6)
Residential Dwellings	No Parking (In the case of developments in less well-connected areas, a robust Transport Assessment must be provided to justify the need for any car parking spaces for new residents)		
Dwellings converted into self-contained flats and bedsits	As above		
Dwellings converted into non self-contained flats and bedsits	As above		
Retirement dwellings	1 space per 10 dwellings (see also below - Parking for disabled people)		
Warden supervised dwellings	1 space per 20 dwellings (plus 1 space for warden)		
Children's homes, retirement and nursing homes	1 space for every 20 residents		
Hospitals	To be assessed based on Transport Assessment and Travel Plan		
Parking for disabled people (residential developments (C3) only)	The number of off-street disabled parking spaces to be provided must be a minimum of 5% of the total number of dwellings in the development. In addition, passive provision is to be made to add a further 2% (making 7% in all) to be brought into use at such time as these additional spaces are required in the future		



**Table 3: Car Parking Standards for Non-Residential Uses**

<b>Offices (Business, financial and professional services)</b>
Standard applies to Use Classes E(c)
<p><b>PTAL 1-2:</b> 1 space per 200 sqm GFA</p> <p><b>PTAL 3-4:</b> 1 space per 400 sqm GFA</p> <p><b>PTAL 5-6:</b> 1 space per 800 sqm GFA</p>
<b>Shopping (E(a) and F2(a))</b>
<p><b>PTAL 1- 4</b></p> <ul style="list-style-type: none"> <li>• Smaller food store (up to 500 sqm GFA) – 1 space per 200 sqm</li> <li>• Food supermarket (up to 2,500 sqm RFA / 4000 sqm GFA) – 1 space per 100 sqm</li> <li>• Food superstore (over 2,500 sqm RFA / 4000 sqm GFA) – 1 space per 100 sqm</li> <li>• Non-food warehouse – 1 per 100 sqm</li> <li>• Garden centre – 1 space per 100 sqm</li> <li>• Town centre/shopping mall – 1 space per 200 sqm</li> </ul> <p><b>PTAL 5-6</b></p> <ul style="list-style-type: none"> <li>• Smaller food store (up to 500 sqm GFA) - 1 space per 400 sqm</li> <li>• Food supermarket (up to 2,500 sqm RFA / 4000 sqm GFA) – 1 space per 200 sqm</li> <li>• Food superstore (over 2,500 sqm RFA / 4000 sqm GFA) – 1 space per 200 sqm</li> <li>• Non-food warehouse – 1 per 200 sqm</li> <li>• Garden centre – 1 space per 200 sqm</li> <li>• Town centre/shopping mall – 1 space per 400 sqm</li> <li>• Servicing:                             <ul style="list-style-type: none"> <li>• Units of less than 2000 sqm GFA should provide one full sized lorry bay per 1000 sqm. Existing servicing facilities may be taken into account provided these are convenient and available for use by the proposed development</li> <li>• Where a proposed development consists of a number of small shop units, full sized lorry bays sufficient for the total floor area of the development should be provided (bays shared among units). In addition, a bay suitable for LGVs should be provided for every 3 units</li> <li>• For units of more than 2000 sqm GFA one full sized lorry bay is required for each 2000 sqm</li> </ul> </li> </ul>
<b>Industry</b>
Standard applies to factories, warehouses and other distribution/storage premises, including ancillary offices
<b>PTAL 1-3:</b> 1 space per 300 sqm GFA

**PTAL 4-6:** 1 space per 600 sqm GFA

<b>Hotels, public houses and restaurants</b>	
Hotels, Motels, boarding and guest houses	1 space per 20 bedrooms, depending on PTAL (plus 1 coach parking space per 100 guest bedrooms. Allowance should be made for taxi drop offs)  A3 standards apply to restaurants/bars open to non-residents
Hostels (incl. B&B, establishments for homeless persons)	To be assessed individually in view of the wide variety of accommodation of this type, but max 1 space per 20 bedrooms
Public houses, wine bars, restaurants, cafes	In major and district centres within the borough, no additional parking.  1 space per 20 seats maximum outside these centres. (Parking standards for hotels apply where there is guest bedroom accommodation)
Hot food takeaways	To be assessed in relation to location, access to public transport, hours of operation, highway safety and availability of alternative parking, delivery and collection facilities

<b>Other public buildings</b>	
Health centres, health clinics, doctors', dentists', veterinary surgeries	1 space per consulting room
Nursery, primary and secondary schools	<b>PTAL 1-2:</b> 1 space per 5 staff <b>PTAL 3-4:</b> 1 space per 10 staff <b>PTAL 5-6:</b> No parking permitted
Colleges of further education (incl. 6 <sup>th</sup> form colleges), youth centres	<b>PTAL 1-2:</b> 1 space per 5 staff <b>PTAL 3-4:</b> 1 space per 10 staff <b>PTAL 5-6:</b> No parking permitted
<b>Cinemas, conference facilities, leisure complexes, Sports Stadia</b>	
Floorspace less than 1,000 sqm	No parking required
Floorspace above 1,000 sqm	The Council will seek to apply sequential testing to direct these high trip generating uses to town centres and other highly accessible areas in the borough. Where it is proven that the

	proposed use cannot be accommodated within these areas, parking requirements will be assessed on a case-by-case basis based on factors including the proposed development's size and location; accessibility; and full transport assessment and travel plan
<b>Places of religious assembly</b>	
	1 space per 20 worshippers normally present <sup>(84)</sup>

<b>Parking for disabled people (non-residential)</b>	
For all other use classes, 5% of spaces (1 minimum) should be allocated for disabled use. In larger public buildings, a number of spaces should be wide enough to accommodate mini-buses/community transport/dial-a-ride vehicles	

### Motorcycle Parking

**21.44** One motorcycle space should be provided for every 20 car parking spaces. A minimum area of 2m x 1 m should be allowed per motorcycle. Motorcycle parking should be sited close to the entrance of a building, visible, and ideally covered by CCTV. Wherever possible, there should be a secure metal bar to which to lock motorcycles.

### Taxis

**21.45** To be assessed individually. Developments that are associated with taxi movements should make provision for taxi pick-ups and drop-offs. For some major developments, a dedicated taxi rank may also be appropriate. Consideration of this should form part of the development's Transport Assessment.

84 Where venues have a capacity greater than 500, event day management plans will be required to manage transport and access during high attendance events.

## Appendix 2 - Employment Land

### Employment Land

Site Reference	Site Name	Size (hectares)
SIL1	Hall Lane	1.85
SIL2	Cork Tree Retail Park	2.24
SIL3	North Circular Road	4.06
SIL4	Blackhorse Lane	5.40
SIL5	Argall Avenue	26.60
SIL6	Rigg Approach	5.06
SIL7	Lammas Road	1.96
SIL8	Orient Way	3.19
LSIS1	Highams Park Industrial Estate	5.67
LSIS2	Cabinet Way	2.17
LSIS3	Justin Road/Trinity Way	3.21
LSIS4	Waltham Park Way	2.91
LSIS5	Sutherland Road	1.26
LSIS6	Clifford Road	1.07
LSIS7	Barrett Road	0.55
LSIS8	Argall Avenue Extension	2.51
LSIS9	Heybridge Way	1.42
LSIS10	Church Road	5.36
LSIS11	Hainault Road	1.47
LSIS12	Etloe Road/Simonds Road	2.15
LSIS13	Auckland Road	3.36
LSIS14	Sherrin Road	11.91
LSIS15	Joseph Ray Road	1.61

Site Reference	Site Name	Size (hectares)
LSIS16	Lancaster Road Arches	0.62
LSIS17	Montague Road/Courtenay Road Arches	0.40
LSIS18	Howard Road	0.75
LSIS19	Blackhorse Lane	10.71
BEA1	Hatherley Mews	0.20
BEA2	East London Office Centre	0.10
BEA3	E10 Business Centre	0.30

### Appendix 3 - Monitoring Indicators and Targets

Policy	Monitoring Indicator	Target (if applicable)
Policy 2 'Scale of Growth'	<p>Number of net additional dwellings</p> <ul style="list-style-type: none"> <li>• Granted or deemed granted planning permission</li> <li>• Started</li> <li>• Completed</li> </ul> <p>Amount of additional floorspace</p> <ul style="list-style-type: none"> <li>• Granted or deemed granted planning permission</li> <li>• Started</li> <li>• Completed</li> </ul>	<p>27,000 net additional homes delivered between 2020 and 2035</p> <p>52,000 sqm of employment floorspace (Class E(g), B2, B8)</p>
Policy 3 'Infrastructure for Growth'	<p>Status of key infrastructure projects</p> <p>Change in school capacity</p> <ul style="list-style-type: none"> <li>• Additional school places</li> </ul> <p>Number of GPs in borough</p> <p>Broadband coverage level</p> <ul style="list-style-type: none"> <li>• Number of homes with full-fibre, superfast and ultrafast</li> </ul> <p>CIL Income</p> <p>Other infrastructure projects (as reported in IDP)</p>	

Policy	Monitoring Indicator	Target (if applicable)
<p>Policy 4 'Location of Growth'</p>	<p>Number of new homes in each area and Strategic Location</p> <ul style="list-style-type: none"> <li>● Granted or deemed granted planning permission</li> <li>● Started</li> <li>● Completed</li> </ul> <p>Net additional floorspace and jobs equivalent in each area and Strategic Location</p> <ul style="list-style-type: none"> <li>● Granted or deemed granted planning permission</li> <li>● Started</li> <li>● Completed</li> </ul>	<p>South Waltham Forest: A minimum of 13,340 new homes and 3,250 new jobs in the identified Strategic Locations</p> <p>Central Waltham Forest: A minimum of 6,810 new homes and 1,600 jobs in the identified Strategic Locations</p> <p>North Waltham Forest: A minimum of 1,710 new homes and 1,940 jobs in the identified Strategic Locations</p> <p>A minimum of 5,150 new homes outside the identified Strategic Locations</p>
<p>Policy 5 'Management of Growth'</p>	<p>Proportion of new retail and town centre uses in:</p> <ul style="list-style-type: none"> <li>● Strategic Locations</li> <li>● Designated Centres</li> </ul> <p>by number of units and floorspace (sqm)</p> <p>Total floorspace in designated employment areas</p> <p>Number of jobs created in employment areas</p> <p>Total area (ha) of designated sites and areas (Green Belt, Metropolitan Open Land, Special Protection Areas, Ramsar Sites, Conservation Areas, and Listed Buildings)</p> <p>Number of listed buildings</p>	

Policy	Monitoring Indicator	Target (if applicable)
	Proportion of development which occurs on Previously Developed Land  Number of sites on the Brownfield Land Register <ul style="list-style-type: none"> <li>● Part 1</li> <li>● Part 2</li> </ul> Number and status of Masterplans, Area Frameworks, SPDs, Planning Briefs	

Table 1 Waltham Forest's Spatial and Growth Strategy

Policy	Monitoring Indicator	Target (if applicable)
Policy 12 'Increasing Housing Supply'	Total number of new homes (net and gross) <ul style="list-style-type: none"> <li>● Approved</li> <li>● Started construction</li> <li>● Completed</li> </ul>	Measured for each financial year against the stepped requirement set out in Increasing Housing Supply
Policy 13 'Delivering Genuinely Affordable Housing'	Percentage and total number of new homes (net and gross) disaggregated by tenure <ul style="list-style-type: none"> <li>● Approved</li> <li>● Started construction</li> <li>● Completed</li> </ul>	50% of all new homes to be genuinely affordable across the Plan Period
Policy 14 'Affordable Housing Tenure'	Percentage of homes (gross) on schemes of more than 10 units by tenure <ul style="list-style-type: none"> <li>● Approved</li> <li>● Started construction</li> <li>● Completed</li> </ul>	70% of homes to be low cost affordable rent  30% to be of intermediate tenure
Policy 15 'Housing Size and Mix'	Percentage and Total number of homes by number of bedrooms <ul style="list-style-type: none"> <li>● Approved</li> </ul>	Set out in Policy



Policy	Monitoring Indicator	Target (if applicable)
	<ul style="list-style-type: none"> <li>• Started construction</li> <li>• Completed</li> </ul> <p>Percentage of schemes which achieve the desired proportion</p> <p>Total performance against overall target mix</p>	
<p>Policy 16 'Accessible and Adaptable Housing'</p>	<p>Total number of M4(3) dwellings</p> <ul style="list-style-type: none"> <li>• Approved</li> <li>• Started construction</li> <li>• Completed</li> </ul> <p>Percentage of completed new build homes which meet M4(2)</p> <p>Percentage of completed new build homes which meet M4(3)</p>	<p>M4(2) – 90% of all new build self-contained homes</p> <p>M4(3) – 10% of all new build self-contained homes</p>
<p>Policy 17 'Redevelopment and Intensification of Existing Housing Estates'</p>	<p>Percentage of developments resulting in an increased density (disaggregated by affordability)</p> <ul style="list-style-type: none"> <li>• Approved</li> <li>• Started Construction</li> <li>• Completed</li> </ul>	<p>Any loss of housing to be replaced by new housing at existing or higher densities with at least the equivalent level of overall floorspace;</p> <p>Development provides at least the identical or equivalent level of affordable housing floorspace;</p>
<p>Policy 18 'Other Forms of Housing'</p>	<p>Number of Build to Rent, Purpose Built Student Housing and Purpose Built Shared Living Housing homes</p> <ul style="list-style-type: none"> <li>• Approved</li> </ul>	

Policy	Monitoring Indicator	Target (if applicable)
	<ul style="list-style-type: none"> <li>Started construction</li> <li>Completed</li> </ul>	
Policy 19 'Small Sites'	Total number of new homes which are small sites (<0.25 ha) <ul style="list-style-type: none"> <li>Approved</li> <li>Started construction</li> <li>Completed</li> </ul>	Intend to Publish London Plan target of 359 per annum
Policy 20 'Housing in Multiple Occupation and Conversions'	Change in number of HMOs and conversions <ul style="list-style-type: none"> <li>Approved</li> <li>Started construction</li> <li>Completed</li> </ul> Number of applications refused Number of conversions approved, refused, completed by <ul style="list-style-type: none"> <li>Floorspace (&gt;or &lt;124 sqm)</li> <li>Car free</li> <li>Meets cycle parking standards</li> </ul>	
Policy 22 'Gypsies and Travellers and Travelling Showpeople'	Number of pitches for Gypsies and Travellers	Up to 9 pitches to meet need identified to 2033
Policy 21 'Supported and Specialist Accommodation'	Number of units of C3 older persons/C2 residential nursing care accommodation <ul style="list-style-type: none"> <li>Approved</li> <li>Started construction</li> <li>Completed</li> </ul>	London Plan – 110 per annum (C3 older persons – sheltered and extra care)

Table 2 Decent Homes for Everyone

Policy	Monitoring Indicator	Target (if applicable)
Policy 24 'Supporting Economic Growth and Jobs'	Change in employment floorspace (sqm) by use class disaggregated by location <ul style="list-style-type: none"> <li>• Approved</li> <li>• Completed</li> </ul>	52,000 sqm of additional employment floorspace, including 36,600 sqm of storage and distribution floorspace, during the plan period
Policy 25 'Safeguarding and Managing Change in Strategic Industrial Locations'	Floorspace change in SIL by use class <ul style="list-style-type: none"> <li>• Approved</li> <li>• Completed</li> </ul>	No net loss of industrial floorspace
Policy 26 'Safeguarding and Managing Change in Locally Significant Industrial Sites'	Floorspace change in LSIS by Use Class <ul style="list-style-type: none"> <li>• Approved</li> <li>• Completed</li> </ul>	No net loss of industrial floorspace
Policy 27 'Safeguarding and Managing Change in Borough Employment Areas'	Floorspace change in BEA by Use Class <ul style="list-style-type: none"> <li>• Approved</li> <li>• Completed</li> </ul>	No unevidenced net loss of employment floorspace
Policy 28 'Approach to Non-Designated Employment Land'	Floorspace change outside of SIL, LSIS and BEA by Use Class	

**Table 3 Building a Resilient and Creative Economy**

Policy	Monitoring Indicator	Target (if applicable)
Policy 35 'Promoting Culture and Creativity'	Change in the number of cultural venues	
Policy 36 'Protecting Public Houses'	Change in the number of pubs	

**Table 4 Promoting Culture and Creativity**

Policy	Monitoring Indicator	Target (if applicable)
Policy 39 'New Retail, Office and Leisure Developments'	Change in floorspace disaggregated by use class and location	

Policy	Monitoring Indicator	Target (if applicable)
Policy 40 'Revitalisation, Adaptation and Regeneration in Designated Centres and Parades'	Vacancy rates Number of BIDs	
Policy 41 'Managing Changes of Use In and Outside Primary Shopping Areas'	Percentage of Primary Shopping Area in E Class Part A use.	

**Table 5 Distinctive Town Centres and High Streets**

Policy	Monitoring Indicator	Target (if applicable)
Policy 46 'Social and Community Infrastructure'	Change in floorspace of social and community infrastructure	

**Table 6 Social and Community Infrastructure**

Policy	Monitoring Indicator	Target (if applicable)
Policy 48 'Promoting Healthy Communities'	Life expectancy Indices of Multiple Deprivation	
Policy 51 'Hot Food Takeaways'	Change in the number of hot food takeaways	
Policy 52 'Betting Shops and Payday Loan Shops'	Change in the number of betting shops and payday loan shops	

**Table 7 Promoting Health and Well-being**

Policy	Monitoring Indicator	Target (if applicable)
Policy 54 'Tall Buildings'	Number of developments of tall buildings (exceeding 10 storeys, or 30m when measured from the ground)	

**Table 8 Creating High Quality Places**

Policy	Monitoring Indicator	Target (if applicable)
Policy 60 'Promoting Sustainable Transport'	To be monitored by the LIP <sup>(85)</sup>	

**Table 9 Sustainable Transport and Infrastructure**

Policy	Monitoring Indicator	Target (if applicable)
Policy 70 'Designated Heritage Assets'	Change in the number of designated heritage assets <ul style="list-style-type: none"> <li>• Conservation Areas</li> <li>• Statutorily Listed Buildings</li> <li>• Archaeological Remains (in Archaeological Priority Zones)</li> </ul>	
Policy 71 'Listed Buildings'	Change in the number of listed buildings	
Policy 75 'Locally Listed Heritage Assets'	Change in the number of locally listed buildings	

**Table 10 Enhancing and Preserving our Heritage**

Policy	Monitoring Indicator	Target (if applicable)
Policy 77 'Green Infrastructure and the Natural Environment'	Change in area (ha) designated as MOL/MGB	
Policy 79 'Biodiversity and Geodiversity'	Units of Biodiversity Net Gain (BNG) secured against units lost  Total area of SINC	Minimum 10% biodiversity net gain using the Defra Biodiversity Metric 2.0, on development sites.
Policy 81 'Epping Forest and the Epping Forest Special Area of Conservation'	Visitor Uplift in Suitable Alternative Natural Greenspaces (SANGs), ascertained through visitor surveys before and after	Achieve visitor uplift for each SANG at the level set out in the SANG Strategy and Green and Blue Spaces SPD. This will be monitored and reported annually in line with housing delivery.

Policy	Monitoring Indicator	Target (if applicable)
	<p>intervention. To include counts of visitors (per day) and visitor origination</p> <p>SANG capacity in relation to homes delivered.</p> <p>Total expenditure on SANG sites and breakdown of expenditure (delivery/maintenance)</p> <p>SANG Ecological Surveys (SES)</p> <ul style="list-style-type: none"> <li>• number of condition surveys carried out</li> <li>• site condition rating (eg: good - needs improvement - poor)</li> </ul> <p>No harm to the Epping Forest SAC arising from traffic growth, based on the number of trips to/from a development site compared with the level set out in the submitted Transport Assessment and Air Quality Study 2</p> <p>The condition of Epping Forest Special Area of Conservation's SAC qualifying features (Beech woodland, holly shrub layer and stag beetles), including any evidence of negative effects from recreational pressure, urban effects and air quality.</p>	<p>No increase in the number of vehicle trips to/from a development site above the level set out in the submitted Transport Assessment and Air Quality Study 2</p>
<p>Policy 84 'Food Growing and Allotments'</p>	<p>Change in number of allotments</p>	<p>No net loss</p>

Table 11 Protecting and Enhancing the Environment

Policy	Monitoring Indicator	Target (if applicable)
<p>Policy 85 'A Zero Carbon Borough'</p>	<p>Proportion of major development submitting an energy assessment</p> <p>Proportion of development meeting zero-carbon emissions target</p> <p>% carbon Reductions proposed below part L from the Be Lean stage of the energy hierarchy.</p> <p>Number of Energy masterplans in progress</p> <p>COF contributions</p>	<p>All major applications to prepare an energy assessment</p>
<p>Policy 86 'Decentralised Energy'</p>	<p>Proportion of developments of:</p> <ul style="list-style-type: none"> <li>● 1 or more home or &gt;100m<sup>2</sup> located within 200m of existing or committed decentralised energy network</li> <li>● Major development located within 500m of an existing or committed decentralised energy network</li> </ul> <p>which connect to the decentralised energy network</p>	
<p>Policy 87 'Sustainable Design and Construction'</p>	<p>Proportion of proposals which achieve BREAM rating:</p> <ul style="list-style-type: none"> <li>● Unclassified</li> <li>● Pass</li> <li>● Good</li> <li>● Very Good</li> </ul>	

Policy	Monitoring Indicator	Target (if applicable)
	<ul style="list-style-type: none"> <li>● Excellent</li> <li>● Outstanding</li> </ul> <p>Number of proposals which are accredited by HQM and Passivhaus</p> <p>Number of schemes recycling:</p> <ul style="list-style-type: none"> <li>● 0-15%</li> <li>● 15-35%</li> <li>● 35-50%</li> </ul> <p>of demolition and construction material</p> <p>Proportion of developments which have a green roof</p> <p>UGF Score of development</p>	
Policy 88 'Air Pollution'	Increases in Nitrogen Oxides (NOx), Ammonia (NH3), Nutrient Nitrogen deposition and Acid deposition	
Policy 91 'Managing Flood Risk'	<p>Number of planning applications approved and refused with reason for refusal as flood risk where development proposals are required to carry out the sequential test and exception test</p> <p>Number of sites, and total gross units permitted in Flood Zone 1, 2 and 3</p> <p>Contributions received for flood risk mitigations</p>	

Table 12 Ensuring Climate Change Resilience



## Appendix 4 - Strategic and Non-Strategic Policies

### Strategic and Non-Strategic Policies

**24.1** The Plan sets out Strategic Policies to address the strategic priorities of the borough, including an overall strategy for the pattern, scale, and design quality of places, and makes sufficient provision for:

- Housing (including affordable housing), employment, retail, leisure and other commercial development;
- Infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- Community facilities (such as health, education and cultural infrastructure); and
- Conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.

**24.2** The table below indicates whether a policy is strategic or non-strategic.

Policy	Strategic	Non Strategic
Policy 1 'Presumption in Favour of Sustainable Development'	X	
Policy 2 'Scale of Growth'	X	
Policy 3 'Infrastructure for Growth'	X	
Policy 4 'Location of Growth'	X	
Policy 5 'Management of Growth'	X	
Policy 6 'Ensuring Good Growth'		X
Policy 7 'Encouraging Mixed Use Development'		X
Policy 8 'Character-Led Intensification'		X
Policy 9 'South Waltham Forest'	X	

<b>Policy</b>	<b>Strategic</b>	<b>Non Strategic</b>
Policy 10 'Central Waltham Forest'	X	
Policy 11 'North Waltham Forest'	X	
Policy 12 'Increasing Housing Supply'	X	
Policy 13 'Delivering Genuinely Affordable Housing'	X	
Policy 14 'Affordable Housing Tenure'	X	
Policy 15 'Housing Size and Mix'		X
Policy 16 'Accessible and Adaptable Housing'		X
Policy 17 'Redevelopment and Intensification of Existing Housing Estates'		X
Policy 18 'Other Forms of Housing'		X
Policy 19 'Small Sites'		X
Policy 20 'Housing in Multiple Occupation and Conversions'		X
Policy 21 'Supported and Specialist Accommodation'		X
Policy 22 'Gypsies and Travellers and Travelling Showpeople'		X
Policy 23 'Community Housing'		X
Policy 24 'Supporting Economic Growth and Jobs'	X	

<b>Policy</b>	<b>Strategic</b>	<b>Non Strategic</b>
Policy 25 'Safeguarding and Managing Change in Strategic Industrial Locations'	X	
Policy 26 'Safeguarding and Managing Change in Locally Significant Industrial Sites'		X
Policy 27 'Safeguarding and Managing Change in Borough Employment Areas'		X
Policy 28 'Approach to Non-Designated Employment Land'		X
Policy 29 'Industrial Masterplan Approach'		X
Policy 30 'Co-Location Design Principles'		X
Policy 31 'Workspaces'		X
Policy 32 'Affordable Workspace'		X
Policy 33 'Local Jobs, Skills, Training and Procurement'		X
Policy 34 'Railway Arches'		X
Policy 35 'Promoting Culture and Creativity'		X
Policy 36 'Protecting Public Houses'		X
Policy 37 'Blackhorse Lane Creative Enterprise Zone'		X
Policy 38 'Hierarchy of Centres'	X	
Policy 39 'New Retail, Office and Leisure Developments'		X

<b>Policy</b>	<b>Strategic</b>	<b>Non Strategic</b>
Policy 40 'Revitalisation, Adaptation and Regeneration in Designated Centres and Parades'		X
Policy 41 'Managing Changes of Use In and Outside Primary Shopping Areas'		X
Policy 42 'Managing Changes of Use in Neighbourhood Centres and Local Retail Parades'		X
Policy 43 'Managing Changes of Use in Non-Designated Areas'		X
Policy 44 'Evening and Night-Time Economy Uses'		X
Policy 45 'Shopfronts and Signage'		X
Policy 46 'Social and Community Infrastructure'		X
Policy 47 'Education and Childcare Facilities'		X
Policy 48 'Promoting Healthy Communities'		X
Policy 49 'Health Impact Assessments'		X
Policy 50 'Noise, Vibration and Light Pollution'		X
Policy 51 'Hot Food Takeaways'		X
Policy 52 'Betting Shops and Payday Loan Shops'		X
Policy 53 'Delivering High Quality Design'		X

Policy	Strategic	Non Strategic
Policy 54 'Tall Buildings'		X
Policy 55 'Building Heights'		X
Policy 56 'Residential Space Standards'		X
Policy 57 'Amenity'		X
Policy 58 'Making Places Safer and Designing Out Crime'		X
Policy 59 'Advertisements, Hoardings and Signage'		X
Policy 60 'Promoting Sustainable Transport'	X	
Policy 61 'Active Travel'		X
Policy 62 'Public Transport'		X
Policy 63 'Development and Transport Impacts'		X
Policy 64 'Deliveries, Freight and Servicing'		X
Policy 65 'Construction Logistic Plans'		X
Policy 66 'Managing Vehicle Traffic'		X
Policy 67 'Electric Vehicles'		X
Policy 68 'Utilities Infrastructure'		X
Policy 69 'Digital Infrastructure'		X
Policy 70 'Designated Heritage Assets'	X	
Policy 71 'Listed Buildings'		X

Policy	Strategic	Non Strategic
Policy 72 'Conservation Areas'		X
Policy 73 'Archaeological Assets and Archaeological Priority Areas'		X
Policy 74 'Non-Designated Heritage Assets'		X
Policy 75 'Locally Listed Heritage Assets'		X
Policy 76 'Highams Area of Special Character'		X
Policy 77 'Green Infrastructure and the Natural Environment'	X	
Policy 78 ' Parks, Open Spaces and Recreation '		X
Policy 79 'Biodiversity and Geodiversity'		X
Policy 80 'Trees'		X
Policy 81 'Epping Forest and the Epping Forest Special Area of Conservation'	X	
Policy 82 'The Lee Valley Regional Park'	X	
Policy 83 'Protecting and Enhancing Waterways and River Corridors'		X
Policy 84 'Food Growing and Allotments'		X
Policy 85 'A Zero Carbon Borough'		X
Policy 86 'Decentralised Energy'		X

<b>Policy</b>	<b>Strategic</b>	<b>Non Strategic</b>
Policy 87 'Sustainable Design and Construction'		X
Policy 88 'Air Pollution'	X	
Policy 89 'Water Quality and Water Resources'		X
Policy 90 'Contaminated Land'		X
Policy 91 'Managing Flood Risk'	X	
Policy 92 'Overheating'		X
Policy 93 'Waste Management'	X	
Policy 94 'Infrastructure and Developer Contributions'	X	
Policy 95 'Monitoring Growth Targets'	X	

## Appendix 5 - Schedule of Superseded Policies

### Introduction

**25.1** The policies contained in the new Local Plan (LP1) will replace a number of policies in the currently adopted Waltham Forest Local Plan made up of the Core Strategy (adopted 2012), Development Management Policies Document (adopted 2013) and the Area Action Plans for Walthamstow Town Centre (adopted 2014) and Blackhorse Lane (adopted 2015). The table below is a guide showing how existing policies have been replaced or intend to be replaced through the forthcoming Site Allocation Document (LP2).

### Waltham Forest Core Strategy & Development Management Policies

Core Strategy (2012)	Development Management Policies Document (2012)	Superseded by New Local Plan Policy
CS1 - Location and Management of Growth	DM1 - Sustainable Development and Mixed Use Development	Policy 4 - Location of Growth  Policy 5 - Management of Growth  Policy 6 - Ensuring Good Growth  Policy 7 - Encouraging Mixed Use Development  Policy 8 - Character-Led Intensification
CS2 - Improving Housing Quality and Choice	DM2- Meeting Housing Targets  DM3 - Affordable Housing Provision  DM4 - Residential Extensions and Alterations  DM5 - Housing Mix  DM6 - Dwelling Conversions, Housing in Multiple Occupation and Buildings in Multiple Residential Occupation	Policy 12 - Increasing Housing Supply  Policy 13 - Delivering Genuinely Affordable Housing  Policy 14 - Affordable Housing Tenure  Policy 15 - Housing Size and Mix  Policy 16 - Accessible and Adaptable Housing



	<p>DM7 - External Amenity and Internal Space Standards</p> <p>DM8 - Gypsy and Traveller Provision</p> <p>DM9 - Specialised Housing</p>	<p>Policy 17 - Redevelopment and Intensification of Existing Housing Estates</p> <p>Policy 18 - Other Forms of Housing</p> <p>Policy 19 - Small Sites</p> <p>Policy 20 - Housing in Multiple Occupation and Conversions</p> <p>Policy 21 - Supported and Specialist Accommodation</p> <p>Policy 22 - Gypsies and Travellers and Travelling Showpeople</p> <p>Policy 23 - Community Housing</p>
<p>CS3 - Providing Infrastructure</p>	<p>DM17 - Social and Physical Infrastructure</p> <p>DM36 - Working with Partners and Infrastructure</p>	<p>Policy 3 - Infrastructure for Growth</p> <p>Policy 68 - Utilities Infrastructure</p> <p>Policy 69 - Digital Infrastructure</p>
<p>CS4- Minimising and Adapting to Climate Change</p>	<p>DM11 - Decentralised and Renewable Energy</p>	<p>Policy 85 - A Zero Carbon Borough</p> <p>Policy 86 - Decentralised Energy</p> <p>Policy 87 - Sustainable Design and Construction</p> <p>Policy 88 - Air Pollution</p> <p>Policy 89 - Water Quality and Water Resources</p>

		<p>Policy 90 - Contaminated Land</p> <p>Policy 91 - Managing Flood Risk</p> <p>Policy 92 - Overheating</p>
<p>CS5 - Enhancing Green Infrastructure and Biodiversity</p>	<p>DM12 - Open Space, Sports and Recreation</p> <p>DM34 - Water</p> <p>DM35 - Biodiversity and Geodiversity</p>	<p>Policy 77 - Green Infrastructure and the Natural Environment</p> <p>Policy 78 - Parks Open Spaces and Recreation</p> <p>Policy 79 - Biodiversity and Geodiversity</p> <p>Policy 80 - Trees</p> <p>Policy 81 - Epping Forest and Epping Forest Special Area of Conservation</p> <p>Policy 82 - The Lee Valley Regional Park</p> <p>Policy 83 - Protecting and Enhancing Waterways and River Corridors</p> <p>Policy 84 - Food Growing and Allotments</p>
<p>CS6 - Promoting Sustainable Waste Management and Recycling</p>	<p>DM10 - Resource Efficiency and High Environmental Standards</p>	<p>Policy 93 - Waste Management</p>

<p>CS7 - Developing Sustainable Transport</p>	<p>DM13 - Co-ordinating Land use and Transport</p> <p>DM14 - Sustainable Transport Network</p> <p>DM15 - Managing Private Motorised Transport</p> <p>DM16 - Parking</p> <p>DM37 Telecommunications</p>	<p>Policy 60 - Promoting Sustainable Transport</p> <p>Policy 61 - Active Travel</p> <p>Policy 62 - Public Transport</p> <p>Policy 63 - Development and Transport Impacts</p> <p>Policy 64 - Deliveries, Freight and Servicing</p> <p>Policy 65 - Construction Logistic Plans (CLPs)</p> <p>Policy 66 - Managing Vehicle Traffic</p> <p>Policy 67 - Electric Vehicles (EV)</p>
<p>CS8 - Making Efficient Use of Employment Land</p>	<p>DM18 - Strategic Industrial Locations</p> <p>DM19 - Borough Employment Areas</p> <p>DM20 - Non-Designated Employment Areas</p>	<p>Policy 25 - Safeguarding and Managing Strategic Industrial Locations</p> <p>Policy 26 - Safeguarding and Managing Change in Locally Significant Industrial Sites</p> <p>Policy 27 - Safeguarding and Managing Change in Borough Employment Areas</p> <p>Policy 28 - Approach to Non-Designated Employment Land</p> <p>Policy 29 - Industrial Masterplan Approach</p> <p>Policy 30 - Co-Location Design Principles</p> <p>Policy 31 - Workspaces</p> <p>Policy 32 - Affordable Workspace</p>

		Policy 34 - Railway Arches
CS9 - Promoting Better Education	DM23 - Health and Well Being  DM 24 - Environmental Protection	Policy 24 - Supporting Economic Growth and Jobs  Policy 33 - Local Jobs, Skills, Training and Procurement
CS11 - Tourism Development and Visitor Attractions	DM22 - Tourism Development and Visitor Attractions	Policy 35 - Promoting Culture and Creativity
CS12 - Protecting and Enhancing Heritage Assets	DM28 - Heritage Assets	Policy 70 - Designated Heritage Assets  Policy 71 - Listed Buildings  Policy 72 - Conservation Areas  Policy 73 - Archaeological Assets and Archaeological Priority Areas Policy 74 - Non-Designated Heritage Assets  Policy 75 - Locally Listed Buildings  Policy 76 - Highams Area of Special Character
CS13 - Promoting Health and Well-Being	Policy DM17 - Social and Physical Infrastructure  Policy DM23 - Health and Well Being	Policy 48 - Promoting Healthy Communities  Policy 49 - Health Impact Assessment  Policy 50 - Noise, Vibration and Light Pollution  Policy 51 - Hot Food Takeaways  Policy 52 - Betting Shops and Payday Loan Shops

<p>CS14 - Attractive and Vibrant Town Centres</p>	<p>DM25 - Managing Town Centre Uses</p> <p>DM26 - New Retail, Office and Leisure Developments</p> <p>DM27 – NightTime Economy Uses</p>	<p>Policy 38 - Hierarchy of Centres</p> <p>Policy 39 - New Retail, Office and Leisure Developments</p> <p>Policy 40 - Revitalisation, Adaptation and Regeneration in Designated Centres and Parades</p> <p>Policy 41 - Managing Changes of Use in and Outside Primary Shopping Areas</p> <p>Policy 42 - Managing Changes of Use in Neighbourhood Centres and Local Retail Parades</p> <p>Policy 43 - Managing Changes of Use in Non-Designated Areas</p> <p>Policy 44 - Evening and Night-Time Economy Uses</p> <p>Policy 45 - Shopfronts and Signage</p>
<p>CS15 - Well designed Buildings, Places and Spaces</p>	<p>DM29 - Design Principles, Standards and Local Distinctiveness</p> <p>DM30 - Inclusive Design and the Built Environment</p> <p>DM31 - Tall Buildings</p> <p>DM32 - Managing Impact of Development on Occupiers and Neighbours</p>	<p>Policy 53 - Delivering High-Quality Design</p> <p>Policy 54 - Tall Buildings</p> <p>Policy 56 - Residential Space Standards</p> <p>Policy 57 - Amenity</p> <p>Policy 59 - Advertisements, Hoardings and Signage</p>

CS16 - Making Waltham Forest Safer	DM33 - Improving Community Safety	Policy 58 - Making Safer Places and Designing Out Crime
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**Walthamstow Town Centre Area Action Plan**

<b>Walthamstow Town Centre Area Action Plan (adopted September 2014)</b>	<b>Superseded by new Local Plan Policy/Saved</b>
WTC1: Presumption in Favour of Sustainable Development	Policy 1 - Presumption in Favour of Sustainable Development
WTC2: Housing Growth	Policy 10 - Central Waltham Forest
WTC3 - Retail	Policy 10 - Central Waltham Forest
WTC4 - Leisure, Entertainment, Culture and Tourism	Policy 10 - Central Waltham Forest Policy 44 - Evening and Night-Time Economy Uses
WTC5 - Employment	Policy 27 - Safeguarding and Managing Change in Borough Employment Areas Policy 28 - Approach to Non-Designated Employment Land Policy 30 - Co-Location Design Principles Policy 31 - Workspaces Policy 32 - Affordable Workspace
WTC6 - Transport Improvements	Policy 3 - Infrastructure for Growth Policy 10 - Central Waltham Forest
WTC7 - Sustainable Transport	Policy 60 - Promoting Sustainable Transport
WTC8 - Car and Cycle Parking	Policy 66 - Managing Vehicle Traffic Policy 61 - Active Travel
WTC9 - Design and Place Making	Policy 10 - Central Waltham Forest Policy 53 - Delivering High Quality Design Policy 54 - Tall Buildings Policy 56 - Residential Space Standards

	Policy 57 - Amenity Policy 59 - Advertisements, Hoardings and Signage
WTC10 - High Quality Environment	Policy 10 - Central Waltham Forest
WTC11 - Shop Fronts	Policy 45 - Shopfronts and Signage
WTC12 - Decentralised Energy Network	Policy 86 - Decentralised Energy
WTC13 - Social Infrastructure	Policy 46 - Social and Community Infrastructure
WTC14 - Access to Sites of Nature Conservation	Policy 77 - Green Infrastructure and the Natural Environment Policy 79 - Biodiversity and Geodiversity
Policy WTCOS1 - Snooker Hall at Junction of Hoe Street and Forest Road	Expired
Policy WTCOS2 - Former Factory Tower Hamlets Road	Expired
Policy WTCOS3 - Former Petrol Station Hoe Street	Expired
Policy WTCOS4 - Tax Office on Corner of Church Hill and Hoe Street	Expired
Policy WTCOS5 - EMD Cinema	Expired
Policy WTCOS6 - HSBC Site	Expired
Policy WTCOS7 - Arcade Site	Expired
Policy WTCOS8 - Town Square and Gardens	Expired
Policy WTCOS9 - Selborne Walk Shopping Centre	Expired
Policy WTCOS10 - Station Car Park Phase Two	Expired
Policy WTCOS11 - Sainsbury's Supermarket	Expired
Policy WTCOS12 - Osborne Mews	Expired



Policy WTCOS13 - Buxton Road Bingo Hall and Car Park	Expired
Policy WTCOS14 - 8no. Buxton Road	Expired
Policy WTCOS15 - South Grove	Expired
Policy WTCOS16 - Brunner Road Industrial Units	Expired
Policy WTCOS17 - St James Street Car Park	Expired
Policy WTCOS18 - St James Street Health Centre	Expired

**Blackhorse Lane Area Action Plan**

<b>Blackhorse Lane Area Action Plan (adopted January 2016)</b>	<b>Superseded by new Local Plan policy/Saved</b>
Policy BHL1: Presumption in Favour of Sustainable Development	Policy 1 - Presumption in Favour of Sustainable Development
Policy BHL2: Housing Growth	Policy 10 - Central Waltham Forest
Policy BHL3: Housing Densities	Policy 8 - Character-Led Intensification Policy 53 - Delivering High Quality Design Policy 54 - Tall Bindings
Policy BHL4: Household Sizes	Policy 15 - Housing Size and Mix
Policy BHL5: Affordable Housing	Policy 14 - Affordable Housing Tenure
Policy BHL6: Employment	Policy 25 - Safeguarding and Managing Change in Strategic Industrial Locations Policy 26 - Safeguarding and Managing Change in Locally Significant Industrial Sites Policy 27 - Safeguarding and Managing Change in Borough Employment Areas Policy 28 - Approach to Non-Designated Employment Land Policy 30 - Co-Location Design Principles Policy 31 - Workspaces Policy 32 - Affordable Workspace
Policy BHL7: Neighbourhood Centre and Local Retail Parades	Policy 42 - Managing Changes of Use in Neighbourhood Centres and Local Retail Parades Policy 43 - Managing Changes of use in Non- Designated Areas
Policy BHL8: Design and Local Character	Policy 8 - Character-led Intensification

	<p>Policy 10 - Central Waltham Forest</p> <p>Policy 53 - Delivering High Quality Design</p> <p>Policy 54 - Tall Buildings</p> <p>Policy 56 - Residential Space Standards</p> <p>Policy 57 - Amenity</p> <p>Policy 59 - Advertisements, Hoardings and Signage</p>
<p>Policy BHL9: Open Space and Nature Conservation</p>	<p>Policy 77 - Green Infrastructure and the Natural Environment</p> <p>Policy 79 - Biodiversity and Geodiversity</p> <p>Policy 80 - Trees</p> <p>Policy 81 - Epping Forest and Epping Forest Special Area of Conservation</p> <p>Policy 82 - The Lee Valley Regional Park</p>
<p>Policy BHL10: Walthamstow Wetlands and Lee Valley Regional Park</p>	<p>Policy 77 - Green Infrastructure and the Natural Environment</p> <p>Policy 79 - Biodiversity and Geodiversity</p> <p>Policy 80 - Trees</p> <p>Policy 81 - Epping Forest and Epping Forest Special Area of Conservation</p> <p>Policy 82 - The Lee Valley Regional Park</p>
<p>Policy BHL11: Flood Risk</p>	<p>Policy 91 - Managing Flood Risk</p>
<p>Policy BHL12: Transport</p>	<p>Policy 60 - Promoting Sustainable Transport</p> <p>Policy 61 - Active Travel</p> <p>Policy 62 - Public Transport</p> <p>Policy 63 - Development and Transport Impacts</p>

Policy BHL13 Climate Change and Decentralised Energy	Policy 85 - A Zero Carbon Borough Policy 86 - Decentralised Energy
Policy BHL14: Social Infrastructure	Policy 46 - Social and Community Infrastructure
Site BHL1 - Station Hub and Waterfront	Expired
Site BHL2 North - Car Wash & Garage Site	Expired
Site BHL2 South - Blackhorse Road/ Hawarden Road	Expired
Site BHL4 North - Sutherland Road	Expired
Site BHL5 - Papermill Place	Expired
Site BHL6 - Webb's Industrial Estate	Expired
Site BHL7 - Billet Works	Expired
Site BHL8 - 152/154 Blackhorse Road	Expired
Site BHL9 - Former Essex Arms Public House	Expired
Site BHL10 - Marine Engine House	Expired
Site BHL11 - Old Coppermill	Expired

## Glossary

**15 Minute Neighbourhood** - 15-Minute Neighbourhoods are places where people can easily reach most, if not all, of the facilities, experiences and activities they need on a daily basis, within a short walk, wheel, or cycle from home.

**Accessibility** - The ability of people to move round an area and to reach places and facilities. This includes pensioners and disabled people, those with young children and those encumbered with luggage or shopping.

**Active travel** - Active travel is a mode of transportation which requires activity, such as walking or cycling.

**Adoption** - Development Plan Documents and the Statement of Community Involvement are described as being adopted when they have been through an independent examination and have been confirmed through a full meeting of the local planning authority. When they are adopted by the Waltham Forest Council they come into force and are used in decision making on planning applications. Supplementary Planning Documents that are adopted by Waltham Forest Council do not have to go through independent examination first.

**Affordable housing** - Housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions:

- **Affordable housing for rent** - Meets all of the following conditions:
  - (a) the rent is set in accordance with the Government's rent policy for Social Rent or Affordable Rent, or is at least 20% below local market rents (including service charges where applicable);
  - (b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and
  - (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).
- **Starter homes** - Generally a starter home is a compact house or flat specifically designed and built to meet the requirements of young people buying their first home per Sections 2 and 3 of the Housing and Planning Act 2016.
- **Discounted market sales housing** - Housing that is that sold at a discount of at least 20% below local market value. Eligibility is based on local incomes and local house prices and provisions should be in place to ensure housing remains at a discount for future eligible households.
- **Other affordable routes to home ownership** - This includes shared ownership, relevant equity loans, other low cost homes for sale (at a price equivalent to at least 20% below local market value) and rent to buy (which includes a period of intermediate rent).

**Affordable workspace** - Workspace that is provided at rents maintained below the market rate for that space for a specific social, cultural, or economic development purpose.

**Agent of Change Principle** - The principle places the responsibility for mitigating the impact of nuisances (including noise) from existing nuisance-generating uses upon proposed new development.

**Air Quality Assessment (AQA)** - Tests the quality of air within a building by identifying the main pollutants, pollution levels and sources.

**Air Quality Management Area** - An area declared by a local authority where it predicts that national air quality objectives will not be met.

**Amenity** - The features of an area, place, open space, building or habitable room that contribute to its attractiveness and comfort. Harm can be caused to amenity through excessive overlooking or enclosure, loss of privacy, loss of outlook and loss of daylight and sunlight. The degree of harm will always be assessed on a case by case basis.

**Amenity space** - External space provided for the recreational benefit of residents. This can be private or communal.

**Appropriate Assessment** - Required where plans or projects that are not directly linked to the management of a Natura 2000 site (a Special Protection Area (SPA), Special Area for Conservation (SAC) or proposed SPAs and Ramsar sites) may have a significant effect on the conservation objectives and would ultimately affect the integrity of the site, as outlined in Article 6.3 of the Habitats Directive 92/43/EEC.

**Archaeological Priority Area (APA)** - Archaeological Priority Areas are used to highlight where development might affect archaeological remains and also where there is potential for new archaeological discoveries.

**Area Action Plan** - A Development Plan Document which will be used to provide a planning framework for areas where changes are envisaged.

**Area of Special Character** - A designated area with unique architectural or townscape merits that are deemed important and require special consideration and protection.

**Article 4 Direction** - A tool used by local planning authorities to remove some or all permitted development rights that apply to a particular site or area.

**Audience Spectrum Data** - Audience Spectrum is a population profiling tool which describes attendance, participation and engagement with the arts, museums and heritage, as well as behaviours, attitudes and preferences towards such organisations.

**Authority Monitoring Report (AMR)** - The requirement for a local authority to produce an Authority Monitoring Report is set out in [Section 113 of the Localism Act 2011](#). The Act requires every authority to produce a series of reports containing information on the implementation

of the [Local Development Scheme](#), the progress and effectiveness of the Local Plan, and the extent to which the planning policies set out in the Local Plan documents are being achieved.

**Biodiversity** - The diversity of life on Earth which includes plants, animals, micro-organisms and bacteria.

**Biodiversity Action Plan (BAP)** - A strategy prepared for a local area aimed at conserving and enhancing biological diversity.

**Biodiversity net gain (BNG)** - A measure that requires developers to enhance biodiversity by ensuring that any development results in a measurably positive impact in biodiversity compared to the pre-development state.

**Blue Ribbon Network** - Includes the Thames, the canal network, rivers, tributaries and streams within London and London's open water spaces such as docks, reservoirs and lakes. It includes culverted (covered over) parts of rivers, canals or streams.

**Borough Employment Area (BEA)** - Land protected for employment generating uses.

**Brownfield land/sites** - Previously developed land/sites which are or were occupied by a permanent structure, including the curtilage of the developed land and any associated fixed surface infrastructure. Sometimes called "previously developed land".

**Brownfield Register** - A record maintained by local planning authorities identifying previously developed land that is suitable for redevelopment.

**Brown roofs** - Are similar to green roofs (See Living Roofs). Brown roofs are designed to encourage biodiversity. Brown roofs usually utilise local soil and spoil and the roof will often initially be brown in colour. Over time plant species will grow over this substrate and the end result will be a green-coloured roof.

**Buffer Zone (Waterways)** - An area of land adjacent to waterways identified to be kept free of any permanent structures.

**Building for a health life** - A design code to help people improve the design of new and growing neighbourhoods, focusing on creating environments that promote physical and mental well-being.

**Building regulations** - National standards specifying the minimum requirements for building design and construction to ensure safety, health, and welfare of occupants.

**Building Research Establishment Environmental Assessment Method (BREEAM)** - The standard for assessing the sustainability and environmental performance of buildings.

**Build to Rent** - Purpose built housing that is typically 100% rented out. Schemes will usually offer longer tenancy agreements of three years or more, and will typically be professionally managed stock in single ownership and management control.

**Business Improvement District (BID)** - Defined area within which businesses pay an additional tax or fee in order to fund improvements within the district's boundaries.

**'Call-in' or Called-in Planning Application** - The Secretary of State can 'call in' certain planning applications that local authorities propose to approve. For example, where it may have wider effects beyond the immediate locality, significant regional or national controversy, or potential conflict with national policy. These will then be subject to a public inquiry presided over by a Planning Inspector who, in turn, will make recommendation to the Secretary of State who will decide the application instead of the local planning authority.

**Capital Asset Valuation of Amenity Trees (CAVAT)** - A method used to assess the value of trees in terms of the benefits they provide to the community rather than as liabilities.

**Car clubs** - A short-term car rental service that allows members access to cars parked locally for a per-minute, per-hour or per-day fee

**Carbon Dioxide (CO<sub>2</sub>)** - Principal greenhouse gas related to climate change.

**Carbon Offset Fund (COF)** - A fund used to compensate for carbon emissions produced by a development by investing in projects that reduce or capture an equivalent amount of carbon elsewhere.

**Car free housing** - Car free development means no parking provision will be allowed on-site and the occupier will have no ability to obtain car parking permits, except for parking needed to meet the needs of disabled people. Car free housing can help to reduce traffic congestion and associated pollution from new developments.

**Circular economy** - An economic model that promotes sustainability by minimising waste and making the most of resources through recycling, reusing, and reducing.

**Climate Action Plan** - A comprehensive strategy or plan designed to address and mitigate the impacts of climate change within a specific area through reducing greenhouse gas emissions and related climatic impacts.

**Climate change** - Regional or global-scale changes in historical climate patterns arising from natural and/or man-made causes that produce an increasing mean global surface temperature.

**Code for Sustainable Homes (CfSH)** - Code for Sustainable Homes is a national standard to guide the design and construction of sustainable homes. The Code gives a sustainability rating to development which ranges from 1(\*) to 6(\*\*\*\*\*). The higher the rating the more sustainable a home is. The assessment includes efficiency in energy, water, waste, materials, ecology and surface water run-off.

**Combined Heat and Power (CHP)** - The combined production of heat (usually in the form of steam) and power (usually in the form of electricity). The heat can be used as hot water to serve a district heating scheme.



**Community facilities** - Buildings which enable a variety of local activity to take place including, but not limited to, the following:

- Schools and other educational facilities
- Libraries and community centres
- Doctors' surgeries, medical centres and hospitals
- Museums and art galleries
- Child care centres
- Sport and recreational facilities
- Youth clubs
- Playgrounds
- Places of worship
- Emergency services

Some community activities can also be provided via privately run facilities (e.g. pubs and shops).

**Community Infrastructure Levy (CIL)** - The CIL regulations enable local authorities to apply a charge on new developments in their areas to finance the provision of infrastructure.

**Community-led housing** - Schemes that are genuinely community-led all share three common principles: meaningful community engagement and consent occurs throughout the development process (communities do not necessarily have to initiate the conversation, or build homes themselves); there is a presumption that the community group or organisation will take a long-term formal role in the ownership, stewardship or management of the homes; and the benefits of the scheme to the local area and/or specified community group are clearly defined and legally protected in perpetuity.

**Comparison retail/shopping** - Refers to shopping for things like clothes, electrical items, household and leisure goods. Comparison goods are bought relatively infrequently, so consumers usually evaluate prices, features and quality before making a purchase.

**Conservation Area** - An area of special architectural or historic interest where it is desirable to preserve or enhance the character or appearance.

**Construction Logistics Plan (CLP)** - A plan detailing the coordination and management of construction-related activities, often including measures to minimise disruption to local communities.

**Controlled Parking Zones (CPZ)** - Areas in which on-street parking is managed, usually through a permit system, typically where demands for limited space from residents, commuters, shoppers and others are in conflict.

**Convenience retail/shopping** - These refer to shopping for everyday essential items like food, drink, newspapers and confectionery.

**Counter Terrorism Security Advisors (CTSA)** - Advisors providing guidance on security measures to protect against terrorist threats. Their primary role is to provide help, advice, and guidance on all aspects of counter terrorism protective security.

**Creative industries** - Industries which have their origin in individual creativity, skill and talent and which have a potential for wealth and job creation through the generation and exploitation of intellectual property.

**Crossrail 2** - Formerly known as the safeguarding Chelsea - Hackney Line, Crossrail 2 is a planned new railway linking north-east and south-west London. In October 2020, as part of the Transport for London Funding Agreement, a decision was made to pause further work on the design and development of Crossrail 2. Transport for London (TfL) continues to manage the Crossrail 2 Safeguarding Directions on behalf of the Secretary of State for Transport and continues to work with Stakeholders whose developments are affected by the Safeguarding.

**Designing Out Crime Officer (DOCO)** - A professional responsible for incorporating crime prevention measures into the design and planning of developments.

**Development plan** - The development plan is at the heart of the planning system with a requirement set in law that planning decisions must be taken in line with the development plan unless material considerations indicate otherwise. Plans set out a vision and a framework for the future development of the area, addressing needs and opportunities in relation to housing, the economy, community facilities and infrastructure – as well as a basis for conserving and enhancing the natural and historic environment, mitigating and adapting to climate change, and achieving well designed places. The development plan for an area is made up of the combination of strategic policies (which address the priorities for an area) and non-strategic policies (which deal with more detailed matters). The development plan for Waltham Forest will comprise Local Plan Part 1 (this document), Local Plan Part 2 – Site Allocations, which focuses on the development of specific sites, alongside the London Plan (see below), which sets out broader policies for the development of the Greater London, and the North London Waste Plan (see below).

**Developer contributions** - Financial or non-financial contributions required from developers to mitigate the impacts of their developments on infrastructure and community services.

**Digital infrastructure** -Infrastructure, such as small cell antenna and ducts for cables, that supports fixed and mobile connectivity and therefore underpins smart technologies.

**Energy efficiency** - Making the best or most efficient use of energy in order to achieve a given output of goods or services, and of comfort and convenience. This does not necessitate the use of less energy, in which respect it differs from the concept of energy conservation.

**Energy hierarchy** - A framework guiding UK energy policy as follows:

- Use Energy Efficiently (by turning off lights and appliances after use);
- Use Renewable Energy (wherever possible);
- Supply Remaining Energy efficiently (by using decentralised technology such as CHP systems).

Following this hierarchy meets energy demand in the most efficient way and also reduces emissions of carbon dioxide (CO<sub>2</sub>).

**Enjoy Waltham Forest** - A programme to reduce our dependency on cars in favour of increased walking, cycling and public transport, using funding from various sources to tackle key issues surrounding road safety, air quality and public health.

**Environment Agency (EA)** - An environmental regulatory authority formed in 1996, combining the functions of the former National Rivers Authority, Waste Regulation Authorities and Her Majesty's Inspectorate of Pollution.

**Epping Forest Special Area of Conservation (EFSAC)** - Epping Forest's designated conservation area that requires special protection measures to preserve its natural environment.

**Evidence base** - A collective term for technical studies and background research that provides information on key aspects of social, economic and environmental characteristics of the borough. This enables the preparation of a sound development plan to meet the objectives of sustainable development.

**Examination** - Presided over by a Planning Inspector or a Panel of Inspectors appointed by the Secretary of State; this can consist of hearing sessions or consideration of written representations to consider whether the policies and proposals of the local planning authority's Development Plan Documents are sound.

**Exemplar design** - Waltham Forest's underlying approach to ensuring that all new development in the borough delivers the highest architectural and design quality that responds positively to the existing character and context of the local area. Exemplar Design is expected to be sustainable and inclusive, and to achieve community safety, good health outcomes, neighbourliness and resource efficiency.

**Floodplain** - Flat or nearly flat land adjacent to a stream or river that experiences occasional or periodic flooding.

**Flood Risk Assessment (FRA)** - An evaluation of the risk of flooding in a certain area associated with a development and measures to mitigate that risk.

**Floor Area Ratio (FAR)** - The ratio of a building's total floor area to the area of the land on which it is built.

**Future Telecoms Infrastructure Review (FTIR)** - A review of future requirements and plans for telecommunications infrastructure. It aims to examine the market and policy conditions that will enable greater investment in future telecoms infrastructure.

**Geodiversity** - The variety of rocks, fossils, minerals, landforms, soils and natural processes, such as weathering, erosion and sedimentation, that underlie and determine the character of our natural landscape and environment.

**Greater London Archaeology Advisory Service (GLAAS)** - An advisory service, that forms part of Historic England, providing guidance on archaeological matters in the Greater London area.

**Greater London Authority (GLA)** - The GLA is the strategic citywide government for London. It is made up of a directly elected Mayor (the Mayor of London) and a separately elected Assembly (the London Assembly).

**Green Belt (Metropolitan)** - An area of countryside or land that is protected from inappropriate development in order to prevent the sprawl of existing built-up areas and to protect the openness of the countryside. Green Belts are not designated for their beauty or character, although there are many areas of high landscape quality within the Green Belt. The Metropolitan Green Belt is the protected open space that surrounds Greater London.

**Green chain** - Principally an ecological link that connects green spaces.

**Green corridor** - Relatively continuous areas of open space leading through the built environment, which may link to each other and to the Green Belt or Metropolitan Open Land. They often consist of rivers, railway embankments and cuttings, roadside verges, canals, parks, playing fields and extensive areas of private gardens. They may allow animals and plants to be found further into the built-up area than would otherwise be the case and provide an extension to the habitats of the sites they join.

**Greenfield land/sites** - Land or sites that have not been previously developed.

**Green Flag Award** - A recognition given to parks and green spaces meeting certain criteria for quality and environmental sustainability.

**Green infrastructure** - Is a strategically planned and delivered network of high quality green spaces and other environmental features.

**Green roofs** - *See Living Roofs.*

**Greenway** - Network of mainly off-road routes which connect people and open spaces through links with other non-motorised users.

**Gross Floor Area (GFA)** - The total floor area of a building, including all levels and spaces.

**Growth areas** - Areas of the borough that will be the primary focus of new development and regeneration.

**Habitable room** - A habitable room is any room used or intended to be used for sleeping, cooking, living or eating purposes. Enclosed spaces such as bath or toilet facilities, corridors, hallways, utility rooms or similar should not be considered habitable rooms.

**Habitat Regulations Assessment (HRA)** - An assessment undertaken for plans and projects which have the potential to affect European sites of nature conservation importance.

**Healthy Impact Assessment (HIA)** - Used as a systematic framework to identify the potential impacts of a development proposal, policy or plan on the health and wellbeing of the population and highlight any health inequalities that may arise. HIA should be undertaken as early as possible in the plan making or design process to identify opportunities for maximising potential health gains, minimising harm, and addressing health inequalities.

**Healthy Streets Approach** - An approach to planning that prioritises the health and well-being of residents by creating streets and spaces that encourage physical activity and reduce pollution.

**Heat island effect** - Can also referred to as the urban heat island effect and is an effect where the average temperature of an area is higher than nearby rural areas.

**Historic England** - A public body that looks after England's historic environment and provides advice on heritage matters.

**Homes and Communities Agency (HCA)** - The national housing and regeneration agency for England.

**Household waste** - Waste from a private dwelling or residential house or other such specified premises, and includes waste taken to household waste recycling centres.

**Household Waste Recycling Centre (HWRC)** - Facilities to which the public can bring household waste, such as bottles, textiles, cans, paper, green waste and bulky household items/waste for free disposal.

**House in Multiple Occupation (HMO)** - Dwellings which are shared by three or more tenants who form two or more households and share a kitchen, bathroom or toilet. HMOs for between three and six people are classed as C4 whereas HMOs for more than six people are Sui Generis.

**Housing Association** - Independent non-profit making bodies that provide low-cost social housing for people in housing need.

**Housing Delivery Test (HDT)** - A test used to assess whether local planning authorities are delivering a sufficient number of homes in their areas.

**Housing Land Availability (HLA)** - The total amount of land reserved for residential use awaiting development.

**Index of Multiple Deprivation (IMD)** - Small area measures of relative deprivation across each of the constituent nations of the United Kingdom. Areas are ranked from the most deprived area (rank 1) to the least deprived area.

**Infrastructure** - A collective term for physical structures, facilities and services needed by the community, for example, buildings, roads, power supplies, health, sports and education facilities, village halls, doctors' surgeries, churches and open space.

**Infrastructure Delivery Plan (IDP)** - A plan outlining the infrastructure needed to support and sustain new developments including social, physical, and green infrastructure. The IDP sets out what is needed, where it is needed and when it is needed. It then provides an update on the delivery of the required infrastructure to date.

**Infrastructure Funding Statement (IFS)** - A statement outlining the funding sources and mechanisms for infrastructure required to support development.

**Intermediate affordable rent** - Housing at prices and rents above those of social rent, but below market price or rents.

**Issues and Options; and Preferred Options** - The pre-submission consultation stages on Development Plan Documents with the objective of gaining public consensus over proposals ahead of submission to government for independent examination.

**Landfill** - The deposit of waste onto and into land, in such a way that pollution or harm to the environment is prevented and, through restoration, to provide land which may be used for another purpose.

**Lee Valley Regional Park** - Area of open space covering 26 miles along the banks of the River Lea, providing sports and leisure venues, heritage sites, gardens, nature reserves and riverside trails.

**Legibility** - The degree to which a place can be easily understood and accessed by its users.

**Lifetime Homes** - Houses built to a set of design standards which meet the varying needs of occupiers as their lives change and are capable of being adapted easily.

**Living roof/wall** - A self-regenerating, cladding or roofing system using natural materials and planting.

**Local Development Documents (LDD)** - These include Development Plan Documents (which form part of the statutory development plan) and Supplementary Planning Documents (which do not form part of the statutory development plan).

**Local Development Framework (LDF)** - Folder of Local Development Documents for Waltham Forest setting out the council's aspirations for the future development of Waltham Forest.

**Local Development Scheme (LDS)** - Sets out the timetable for preparation of Local Development Documents.

**Local Implementation Plan (LIP)** - A plan outlining how a local authority intends to implement the Mayor of London's Transport Strategy.

**Local Nature Reserve (LNR)** - A statutory designation made under Section 21 of the National Parks and Access to the Countryside Act 1949 by principal local authorities.

**Local Strategic Partnership (LSP)** - An overall partnership of people that brings together organisations from the public, private, community and voluntary sector within a local authority area, with the objective of improving people's quality of life.

**London Cycling Delivery Standards (LCDS)** - Standards and guidelines for the provision of cycling infrastructure in London.

**London Legacy Development Corporation (LLDC)** - A Mayoral Development Corporation formed in April 2012, reporting directly to the Mayor and democratically accountable to Londoners, with the responsibility for delivering the physical legacy of the London 2012 Olympic Games - the long-term planning, development, management and maintenance of the Olympic Park and its impact on the surrounding area.

**London Living Rent** - A type of affordable rent set by the Mayor of London based on average local incomes.

**London Plan** - The London Plan is the spatial development strategy for Greater London, which is produced by the Mayor of London. The London Plan referred to within this Local Plan was published in 2021, and forms part of the statutory development plan for Waltham Forest.

**London Plan Apportionment** - Allocates to each individual borough a given proportion of London's total waste (expressed in tonnes) for which sufficient sites for managing and processing waste must be identified within their Local Development Frameworks.

**Lower Super Output Area** - Unit of geography used for statistical analysis matters such as deprivation. Typically smaller than ward level, usually covering an area of population of approximately 1500.

**Main town centre uses** - Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

**Material consideration** - A matter that should be taken into account in deciding a planning application or on an appeal against a planning decision.

**Metropolitan Open Land (MOL)**- Extensive areas of land bounded by urban development around London that fulfils a similar function to Green Belt and is protected from inappropriate development by land-use planning policies.

**Mixed use development** - A well integrated mix of land uses (retail, employment, leisure and other service uses) with decent homes of different types and tenures to support a range of household sizes, ages and incomes.

**Monitoring indicators** - Generally include three types of indicators: contextual indicators, output indicators, and local indicators including significant effects indicators. Contextual indicators provide the background information of the borough such as population, ethnic composition, crime statistics, local history/distinctiveness etc. Output indicators are used to measure policy targets. Some local indicators as significant effects indicators measure the significant effects of the plan or programme along with sustainability appraisal objectives. Some indicators reflecting cross-cutting issues (for example crime figures) provide valuable information to help identify any unintended and unforeseen consequences. Getting continual feedback from monitoring indicators will enable the Council to identify the necessary action to attain the desired outcomes.

**National Planning Policy Framework (NPPF)** - The government's policies for planning and development in England. This Plan has been written in accordance with the NPPF published in 2021.

**Natura 2000 Network** - The European network of protected sites established under the Birds Directive and Habitats Directive (includes SPA, SAC, Ramsar).

**Natural England** - A government agency responsible for advising on and promoting the conservation of England's natural environment.

**Non-Road Mobile Machinery (NRMM)** - Machinery that is not intended for use on public roads, such as construction equipment.

**North London Waste Authority (NLWA)** - North London's statutory waste disposal authority. The NLWA's main function is to arrange the disposal of waste collected by its seven constituent boroughs. These boroughs are: Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest.

**North London Waste Plan (NLWP)** - The North London Waste Plan (NLWP) was adopted by Waltham Forest in March 2022. The Plan identifies a range of suitable sites/areas to meet the North London Boroughs' future waste management needs and thereby support increased self-sufficiency for London and better use of resources. It sets out a range of policies designed to support determination of planning applications for waste facilities and to ensure a more general and sustainable approach to waste and resource management.

**Passivhaus** - A rigorous standard for energy efficiency in buildings, resulting in very low energy consumption.

**Planning and Compulsory Purchase Act 2004** - The legislation which introduced the new development planning system based on Local Development Frameworks.

**Planning obligation/financial contribution** - Requirements made of a developer to make planning permission acceptable. This could include matters such as the provision of affordable housing as part of the scheme, or a financial contribution towards off-site works such as highway improvements.

**Plan Period** - This is the time frame the Local Plan covers. This Plan covers the period 2020-2035.



**Preliminary Risk Assessment (PRA)** - An initial assessment of potential risks associated with a development to be submitted to a local authority.

**Previously developed land** - See *Brownfield Land/Sites*.

**Proposals Map** - A map showing the location of the sites identified in the Local Development Framework

**Public realm** - The space between and within buildings that are publicly accessible including streets, squares, forecourts, parks and open spaces.

**Public Transport Accessibility Level (PTAL)** - Public Transport Accessibility Levels are a measure of the extent and ease of access to the public transport network. They range from 6 (excellent) through to 1 (very poor).

**Ramsar Site** - Wetlands of international importance designated under the Ramsar Convention.

**Recycling** - Involves the reprocessing of waste, either into the same product or a different one. Many non-hazardous wastes such as paper, glass, cardboard, plastics and metals can be recycled. Hazardous wastes such as solvents can also be recycled by specialist companies, or by in-house equipment.

**Renewable energy** - Energy derived from a source that is continually replenished, such as wind, wave, solar, hydroelectric and energy from plant material, but not fossil fuels or nuclear energy. Although not strictly renewable, geothermal energy is generally included.

**Retail Floor Area (RFA)** - The total floor area used for retail activities in a building or development.

**Retrofit** - Refers to the addition of new technology or features to older systems.

**Riparian** - The riparian area refers to the interface between land and a river or stream.

**Saved policies/plan** - Policies within previously adopted development plans that are saved for a time period during replacement production of new Local Development Documents.

**Section 106 agreement** - A legal agreement under section 106 of the Town & Country Planning Act 1990. Section 106 agreements are legal agreements between a planning authority and a developer, or undertakings offered unilaterally by a developer, that ensure that certain extra works related to a development are undertaken.

**Secured by Design** - A crime prevention initiative operated by the Police Service to guide and encourage those engaged within the specification, design and build of new homes and other properties, including refurbishments to adopt crime prevention measures. Design Guides published on the Secured by Design website cover a range of building sectors, including residential, education, health, transport and commercial and provide a valuable source of reference to architects, developers, self-builders, local authority planners and police officers.

**Sequential Approach/Sequential Test** - Planning policies that require particular steps to be taken, or types of location or sites to be considered, in a particular order of preference. For example retail, commercial and leisure development should be focused on sites within town centres, or if no in-centre sites are available, on sites on the edges of centres that are or can be well integrated with the existing centre and public transport.

**Shared ownership** - A form of affordable housing, where a buyer purchases a share of a property and pays rent on the remaining share.

**Site of Importance to Nature Conservation (SINC)** - A non-statutory designation which seeks to protect areas of high wildlife value at a local level.

**Site of Special Scientific Interest (SSSI)** - Land considered to be of special interest due to its flora, fauna, geological or geographical features under the Wildlife and Countryside Act 1981 (amended in 1985).

**Site Specific Allocations** - A Development Plan Document identifying sites for specific types of land use and any requirements related to them. The Council will prepare this document for Waltham Forest, which is referred to herein as 'Local Plan Part 2 - Site Allocations'.

**Small and Medium Enterprise (SME)** - Business with more than 10 and less than 250 employees.

**Small site** - A development site that is relatively small in scale, of less than 0.25 hectares.

**Social Infrastructure** - A wide variety of services that are essential to the sustainability and wellbeing of a community. This includes educational facilities, health services, sports and leisure facilities, libraries, jobs brokerage centres, community space and faith facilities, cultural facilities and meeting rooms, halls and pubs.

**Social rented housing** - Rented housing owned and managed by local authorities and registered social landlords, for which guideline targets rents are determined through the national rent regime.

**Source Protection Zone** - Area designated to protect groundwater.

**Spatial development** - Changes in the distribution of activities in space and the linkages between them in terms of the use and development of land.

**Special Area of Conservation (SAC)** - A site defined in the European Union's Habitats Directive (92/43/EEC), also known as the Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora to protect habitats and species.

**Special Protection Area (SPA)** - A site designated under the European Union Directive on the Conservation of Wild Birds.

**Stakeholder** - Anyone with an interest in Waltham Forest's development. This includes professionals and the community.

**Statement of Community Involvement** - Sets out the processes to be used by the local planning authority in involving the community in the preparation, alteration and continuing review of all local development documents and development control decisions.

**Statutory bodies** - These include appropriate 'Specific, Government and General' consultation bodies in accordance with Regulation 25 of the Town and Country Planning Act 2004 Regulations.

**Strategic Environmental and Sustainability Appraisal (SEA/SA)** - This is a systematic and continuous assessment of the social, environmental and economic effects of strategies and policies contained in development plans.

**Strategic Industrial Location (SIL)** - An industrial area identified in the London Plan as being of strategic importance for industrial, logistics and related employment uses that support the functioning of London's economy.

**Sui-Generis** - A term given to the uses of land or buildings, not falling into any of the use classes identified by the Use Classes Order, for example theatres, launderettes, car showrooms and filling stations.

**Suitable Alternative Natural Greenspaces (SANGs)** - Areas that are designated with the aim of protecting a Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) or Special Areas of Conservation (SAC) from recreational pressures by providing alternative green space to attract people away from the sites that need protecting.

**Supplementary Planning Documents** - A Local Development Document that may cover a range of issues, thematic or site specific, and provides further detail of policies and proposals in a 'parent' Development Plan Document.

**Sustainability Appraisal** - See *Strategic Environmental and Sustainability Appraisal (SEA/SA)*.

**Sustainable development** - A widely used definition drawn up by the World Commission on Environment and Development: "Development that meets the needs of the present without compromising the ability of future generations to meet their own needs." The government has set out four aims for sustainable development in its 'A Better Quality of Life, a Strategy for Sustainable Development in the UK' to be achieved simultaneously:

- social progress which recognises the needs of everyone
- effective protection of the environment
- prudent use of natural resources
- maintenance of high and stable levels of economic growth and employment.

**Sustainable transport** - A term generally related to movement by forms of transport other than the private car within the urban environment. It most commonly relates to travel by public transport, walking and cycling.

**Sustainable Urban Drainage Systems (SuDS)** - A sequence of water management practices and facilities designed to drain surface water in a manner that will provide a more sustainable approach than the conventional practice of routing run-off through a pipe to a watercourse.

**Town centre** - Areas defined in the local plan occupied by Main Town Centre uses providing a range of commercial, cultural, and civic activities, including shopping, leisure, entertainment, culture and social and community facilities.

**Townscape** - The configuration of buildings and the space between them.

**Transport for London (TfL)** - One of the GLA group of organisations, accountable to the Mayor, with responsibility for delivering an integrated and sustainable transport strategy for London.

**Travel Plan (TP)** - A plan outlining measures to promote sustainable transportation and reduce reliance on single-occupancy vehicles.

**Tree Preservation Order (TPO)** - Usually made by a local planning authority to protect specific trees (or a particular woodland) from deliberate damage and destruction, which could include felling, lopping, topping, uprooting or otherwise wilful damage.

**Trip Rate Information Computer System (TRICS)** - A system providing data and information on travel and trip rates.

**UK Innovation Corridor** - A region or route recognised for its focus on innovation and economic development.

**Ultra Low Emissions Zone (ULEZ)** - A defined area within which vehicles must meet strict emissions standards, and where non-compliant vehicles must pay a charge.

**Urban Greening Factor (UGF)** - A measure used to assess the amount of green space and vegetation to evaluate the quantity and quality of urban greening provided by a development proposal.

**Use Classes Order** - The Town and Country Planning (Use Classes) Order puts uses of land and buildings into various categories. Planning permission is not needed for changes of use within the same use class.

**Walthamstow Wetlands** - A series of open spaces that include Walthamstow Reservoirs, Walthamstow Marshes, Marksfield Park, the Paddock Site, Tottenham Marshes, Stonebridge Lock and Springfield Marina. Improved links between these separate pockets of open space are sought under the Upper Lea Valley Landscape Strategy.

**Waste Planning Authority (WPA)** - An authority responsible for planning and managing waste disposal and recycling facilities.

**Windfall sites/housing** - Is generally any residential development that is given planning permission on land or buildings not specifically allocated for residential development in LDF.

