5 Policy CS2 - Improving Housing Quality and Choice

Strategic Objective 2

Ensure a continuous supply of land and homes to meet a range of housing needs including affordable housing, family housing and accommodation needs of specific groups within the community, whilst offering a range of housing choices which are of high quality in the right places.

Introduction

5.1   One of the three overarching principles of the Council's Sustainable Communities Strategy (2008) is to manage population growth and change. In order to achieve this principle, the Council will aim to establish a plentiful supply of good quality housing, in the right locations, that is supported by the appropriate social and physical infrastructure, jobs and services. The Council aims to build successful communities by providing homes that people want to live in and to create places where people aspire to stay. The Council also aims to build economically balanced communities through providing a greater mix of housing types, tenures and sizes. High quality housing is essential to quality of life and it is the Council's view that everyone has the right to a decent, safe and affordable home, which is suited to their needs and located in a community they want to live in. High quality housing is also vital to the economic prospects of the borough as the ability to retain and attract wealth will largely be determined by the quality and affordability of the housing stock.

Housing Growth

The Council will facilitate sustainable housing growth by:

A) maximising the number of quality homes in the borough by:

i.   resisting the unjustified net loss of residential accommodation;
ii.   prioritising development on previously developed land, particularly unused or underused land;
iii.   focusing the delivery of new homes in Waltham Forest's key growth areas of Walthamstow Town Centre, Blackhorse Lane, the Northern Olympic Fringe, Wood Street and other key sites in the borough to meet or exceed a housing target of 10,320 new homes over the plan period;
iv.   where appropriate, incorporating new homes into mixed use development;
v.   making effective and efficient use of land, by seeking to optimise housing densities;
vi.   supporting initiatives to bring 1035 empty properties back into use over the plan period; and
vii.   working with housing partners to support the programme of housing estate renewal.

Affordable Housing

B) maximising the number of quality affordable homes in the borough by aiming to provide at least 50% (5,700 homes) of homes as affordable over the plan period. Of these 60% should be social rented housing and 40% should be intermediate housing.

Mixed and Balanced Communities

C) creating an economically mixed and balanced community by seeking a range of home sizes and tenures in new development. The Council will prioritise the need for larger homes (3 bedroom or more) in new developments and resist the loss of any existing larger homes. Support will be given to the re-establishment of Houses in Multiple Occupation (HMO) into single family sized houses.

Housing Design and Accessibility

D) creating successful communities by requiring high quality design from all new housing development to ensure it makes a positive contribution to improving the urban environment in the borough. New homes should be accessible to all members of the community and be able to adapt to the changing needs of residents throughout their lives.

Housing for Older and Vulnerable People

E) creating a mixed and inclusive community by enabling a variety of housing types to meet the identified local needs of older and vulnerable people.

Gypsies and Travellers Provision

F) creating an inclusive community by seeking to protect existing provision and consider the future needs and requirements of Gypsies and Travellers.

Housing Growth

5.2   A growing population and smaller household sizes are fuelling significant demand for homes to buy and rent in the borough. The draft replacement London Plan (2009) requires Waltham Forest to provide 11,400 homes (an annual target of 760 homes) between 2011 and 2026. This target is made up of three different components. The first component is conventional supply (new homes) which will contribute 10,320 (an annual target of 688) homes. The second component is empty properties returned back into use which will contribute 1,035 (an annual target of 69) homes. The third component is non - self contained units (such as hostels) which will contribute 45 (an annual target of 3) units.

5.3   The target of 10,320 new homes has been based on an assessment of housing capacity in the borough. The GLA's Strategic Housing Land Availability Assessment (2009) (SHLAA) and the Council's Housing Land Availability Assessment (2008) (HLAA) shows the borough has enough capacity to meet its target, as approximately 11,300 new homes can be provided on over 700 sites.

5.4 The SHLAA and HLAA also demonstrate that the Key Growth Areas have significant housing capacity. As shown in Table 4, Key Growth Areas will provide a minimum of 5,500 new homes which accounts for approximately 50% of the borough's total housing capacity. Other key sites, such as Walthamstow Stadium, part of Whipps Cross Hospital and Chingford Municipal Offices have the capacity to provide a minimum of 2,500 homes which is approximately 22% of total capacity.

Table 4 - Estimated housing capacity of Key Growth Areas and other Key Sites

Location	SHLAA/HLAA Estimate	Potential Supply (up to)
Walthamstow Town Centre	2,000	2,000
Blackhorse Lane	2,000	2,000
Northern Olympic Fringe	800	2,500
Wood Street	700	1,000
Key Growth Area Total	**5,500**	**7,500**
Key Sites	2,500	2,500
Overall Total	**8,000**	**10,000**

5.5 The Council estimates that the key growth areas of Wood Street and the Northern Olympic Fringe have the potential to increase the level of housing provision. Intensifying residential uses, building at higher densities and incorporating residential uses as part of mixed use development will provide opportunities for increasing the supply of new homes in these locations. Such opportunities will be explored through the development of the Area Actions Plans which will be prepared for these key growth areas. A detailed analysis of housing provision has already been undertaken for Walthamstow Town Centre and Blackhorse Lane and thus the reason why there is little projected change to supply.

5.6 The housing trajectory (below) is a means of measuring the Council's past and future housing performance in meeting the housing target. The housing trajectory takes into account information on housing completions, planning approvals and future housing proposals and it estimates how many, when and where new homes will be delivered. The trajectory is based on on going and detailed assessments of capacity, density and emerging site designations and proposals. These figures are subject to ongoing review and monitoring through the Council's Annual Monitoring Report (AMR). The Council's housing trajectory estimates that approximately 11,300 new homes (conventional supply) will be delivered by the end of the plan period.

Figure 8

Waltham Forest 2010 Housing Trajectory up to 2025/26
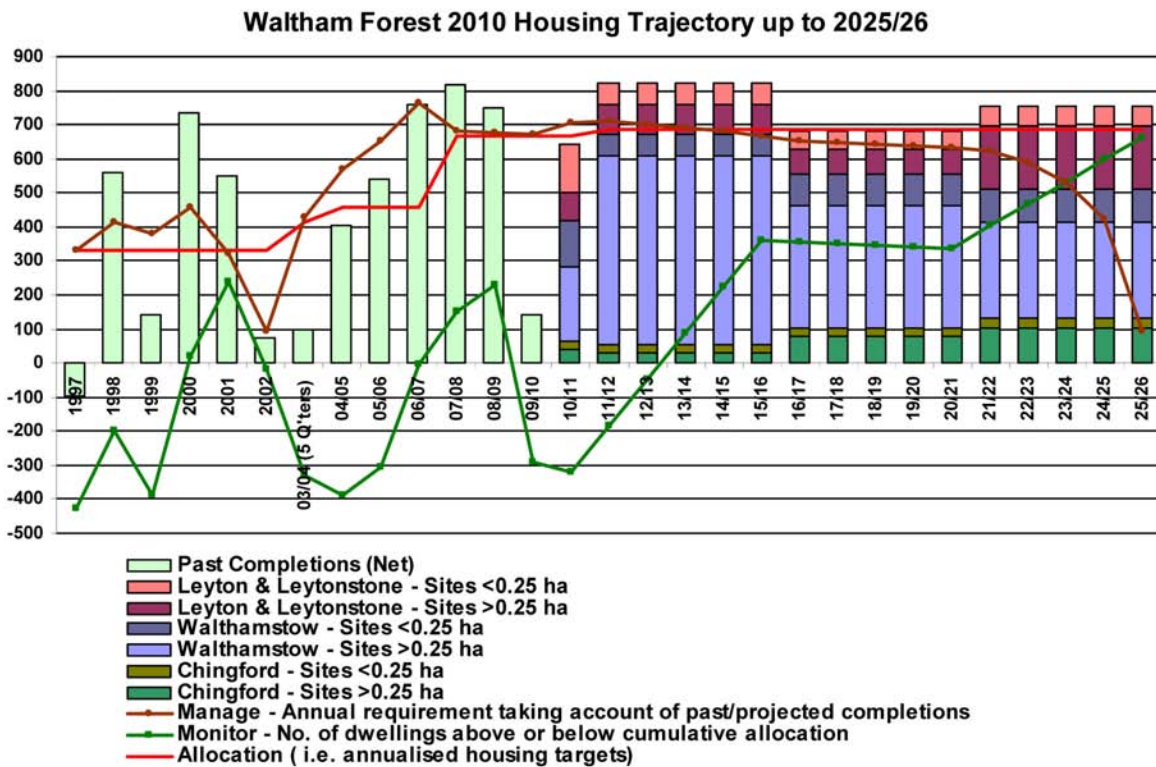
5.7 Windfall sites will also contribute to meeting the borough's housing target. Windfall sites are generally smaller sites which come forward for housing development but have not yet been identified for housing.

5.8 The definition of an empty property is one that has been empty for six months or more. According to the Council's Empty Properties Strategy (2007 - 2010), Council Tax records show there are 2,475 empty private sector dwellings in Waltham Forest, of which 1,611 have been empty for six months or more. This represents over 3% of the total private sector stock. Bringing empty properties back into residential use could provide much needed homes for those with housing need in the borough. Reducing the number of empty properties in the borough can also result in improved environmental conditions and a reduction in the level of crime, anti-social behaviour and blight often associated with empty and derelict properties. In order to maximise the supply of housing, the Council will work with partners to support initiatives and strategies which bring existing empty homes, including flats/spaces above shops, back into occupation. Empty storage spaces above shops which have the potential for conversion can be an important source of housing supply in the borough.

5.9 The Council owns around 10,400 homes that are managed by Ascham Homes and has responsibility for over 1,700 leaseholder properties. There are also 10,500 homes owned and managed by housing associations. The Council has an important role in promoting high standards of management and maintenance. The Council will be undertaking a housing renewal programme which will contribute to creating affordable homes, creating decent homes, improving community cohesion and community safety. The Council has

undertaken a review of housing estates in the borough and this review found that the Marlowe Road, Montague Road, Aldriche Way, Avenue Road, The Drive, Hylands Estate and Vincent Road estates are in need of renewal. The Marlowe Road and Montague Road estates are considered to be a high priority for renewal. The Council will prioritise future funding through the Borough Investment Plan (BIP) and devolved delivery mechanisms to these estates. The Council will support proposals which support this renewal programme. Detailed project plans will be developed in consultation with local residents and after further analysis of the stock condition, housing needs, development potential and financial implications.

5.10   The Council will aim to make the most effective and efficient use of land in the borough in order to maximise housing supply in the borough. The Council will seek to optimise housing densities in appropriate locations. Areas with high levels of public transport accessibility and which are close to local shops and services, such as town centres, are appropriate locations for higher density housing development. The High Density Housing Qualitative Study (2009) is an in-depth investigation into the key issues Waltham Forest residents have about high density housing development. The study highlighted that higher density development needs to be of the highest level of build and design quality, particularly in terms of functional design, durability and character. Homes must be spacious enough for daily activities with storage and appropriate levels of private amenity space.

5.11   Whilst the Council recognises the importance of creating new homes to meet the housing target, it is also important to protect against the loss of existing homes to other uses. The loss of housing in the borough would worsen the borough's housing shortfall and homes lost through redevelopment, change of use or conversion would further widen the gap between supply and demand. Therefore, the Council will seek to ensure that existing homes remain in residential use and any further loss is resisted.

Affordable Housing

5.12   Affordable housing is essentially housing which meets the needs of households whose incomes are not sufficient to enable them to be able to buy or rent housing on the open market. Affordable housing includes Social Rented housing, Shared Ownership and Intermediate Rented housing. Social Rented housing includes housing rented from the Council and or registered social landlords (RSL). The rents on these properties therefore need to be significantly lower than market housing rents. Intermediate housing aims to bridge the gap between social rented housing and market housing. Intermediate housing costs more than social rented housing but should still cost much lower than market housing.

5.13   Waltham Forest has a high level of need for affordable housing. The Housing Needs and Market Survey (2007) identified that the borough has an annual level of outstanding affordable need of 2,607 homes. This is three and half times the Council's housing target (760 homes per year) for all tenures. Waltham Forest has a particularly high level of need for social rented affordable housing with over 10,000 households on the Council's waiting list [14].

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14   Housing Strategy, (2008 - 2011)

5.14   As the Housing Strategy (2008) states, as well as there being a high level of need, resident's in the borough experience an affordability problem arising from the relationship between local incomes and the realistic supply of the cheapest housing available. Income levels of around 92.2% of new households which formed in 2006/7 were below the level necessary to be able to buy outright, 73.1% are unable to access the private rented sector in the borough and a large proportion of households are unable to afford standard intermediate housing. Although average house prices in Waltham Forest are low relative to other London Boroughs, residents clearly find it difficult to access home ownership and private rented housing due to low incomes and restricted mortgage lending.

5.15   Given the significant level of need and the difficulties local residents have in accessing the housing market, the Council seeks to prioritise the delivery of affordable housing. The draft replacement London Plan (2009) sets a strategic target of seeking at least an average of a least 13,200 more affordable homes per year in London. The Council will aim to maximise every opportunity to develop affordable housing in the borough by adopting a pro-active and flexible approach. The Housing Needs and Market Survey (2007) recommends that in order to balance the need for affordable housing with the ambition for creating a sustainable mixed and balanced community a target of 50% additional housing in the form of affordable housing should be required. The Council will also prioritise the need for larger affordable homes.

5.16   In order to deliver the maximum amount of affordable housing, developments proposing less than 50% will need to demonstrate a viability case. In assessing viability, the Council will have regard to the 'dynamic viability model' as demonstrated in the Affordable Housing Viability Study (2009). The 'dynamic viability model' allows for changing market circumstances to be assessed periodically and therefore allows for the proportion of affordable housing sought to be closely related to market conditions. Where a viability case is used to justify an affordable housing offer below 50%, the Council will require the shortfall to be treated as a deferred contribution. The Council will then require a subsequent viability assessment to be undertaken when the scheme is complete and occupied and should viability have improved, the Council will seek a further payment up to a maximum of the deferred sum. Further guidance on how this policy will be implemented will be produced.

5.17   The Council wants to encourage a more economically balanced community and will therefore seek a greater social mix in the borough. Waltham Forest has experienced the trend of more people on higher and medium incomes moving out of the borough than are moving in. This is largely due to the fact that they are unable to find suitable housing options to meet their needs. The Council wants to make the borough a place where high and middle income people choose to live and can afford. The Council aims to secure housing suitable for households across a wide range of incomes to provide local residents with the opportunity to settle and progress up the home ownership ladder.

5.18   In accordance with the draft replacement London Plan (2009), the Housing Needs and Market Survey (2007) and Affordable Housing Viability Study (2009), the Council will aim to provide affordable housing at a split of 60% social rented and 40% intermediate affordable housing. This tenure mix will increase the amount of intermediate housing in the borough and will provide residents on low and medium incomes with more opportunities to own their own home. Giving residents more home ownership opportunities will further support the shift from social rented housing, shared housing and private rented housing

and encourage people to settle in the borough, which will help reduce the transiency of the population. Providing a mix of tenures in new development will also prevent mono tenure housing developments developing in the borough.

5.19 The availability of social housing grant is likely to be low in the short term and it is anticipated that there will be increased use of intermediate housing at higher rents to maintain viability of schemes. The Council will work with its RSL partners to ensure that the intermediate homes for rent are occupied by households in housing need, particularly those wishing to take up shared ownership. Intermediate housing needs a clear purpose rather than being a device to maintain viability.

Mixed and Balanced Communities

5.20 The Council seeks to deliver housing types and sizes that provide adequate choice and meet the changing needs of local residents. Providing a balanced mix of property types and sizes in both market and social sectors to meet the needs arising from the existing population, the impact of demographic change and of immigration in the future is key in delivering a sustainable mix and balanced community.

5.21 Much of the housing in the borough is Victorian or Edwardian, primarily terraces - particularly in the centre and south of the borough. As outlined in the Characterisation Study (2009), the north of the borough has more 1920s and 1930s detached and semi-detached properties which are generally larger in size. Smaller units make up 80.3% of the total housing stock, compared to around 75% in Greater London and 45% nationally. Semi-detached and detached houses represent just 19.6% of the stock. Over 70% of Ascham Homes properties are one or two bedrooms and just over 1% are more than four bedrooms. The Housing Needs and Market Survey (2007) states that of existing households in the borough 58.7% moving to market housing require three or more bedrooms and 78.2% require two or more bedrooms.

5.22 This need is further exacerbated by the fact that Waltham Forest experiences high levels of overcrowding. According to the Housing Needs and Market Survey (2007),12.9% of all existing households are considered to be overcrowded, which is far higher than the national average level of 3%. Overcrowding is particularly high in Council owned and

private rented sector properties of which 22% of properties are overcrowded. Overcrowding can be very damaging, particularly for family living. Overcrowding can affect people's physical and mental health and can have an impact on children's ability to learn and develop.

5.23 As a result, young households, particularly those with middle and higher incomes, have sought to move out of the borough as they are unable to find appropriate sized homes to meet their needs. The Council will aim to balance the housing stock by seeking to provide more larger homes (three bedroom or more) in order to increase the opportunities for family living in both public and private housing and reduce the level of overcrowding.

5.24 According to the Housing Needs and Market Survey (2007), under -occupation affects approximately 20.3% of all households in the borough. Reducing under-occupation can contribute to decreasing the levels of overcrowding and increase the number of larger homes in the borough. The Council will support initiatives which assist in reducing under-occupation, such as programmes which support residents who want to move to a smaller homes.

5.25 In recent years dwelling conversions have been taking place at an increasing rate in the borough. These conversions have resulted in a loss of larger homes and an increase in the number of smaller homes contributing to the imbalance in the housing stock towards smaller homes. This has been a problem in many areas of the borough but particularly in the south and centre. In order to further protect larger homes, the Council will resist the conversion of larger homes into flats and other non self contained housing such as Houses in Multiple Occupation and support their re-introduction into family-sized homes.

High Quality Accessible Homes

5.26 It is the Council's aim to develop vibrant and successful communities. The provision of well designed housing will make a significant contribution to improving the quality of the borough's urban environment. The benefits of higher quality housing include improved social well being and quality of life, greater sense of neighbourhood pride, increased property values, reduced crime rates and a contribution to the mitigation of health inequalities. Higher standards of design can also contribute to mitigating against the impacts of climate change and cater for the borough's changing demographics and diverse range of needs.

5.27   The most 'successful' housing developments are those designed with a clear understanding of their urban context, responding to the characteristics of the place and the community and which make the best use of opportunities offered by existing buildings, landscape, public space and topography. The Council will give careful consideration as to how the scale, height, form and architectural quality of new housing development impacts on the areas of the borough where it is located. The Council will aim to retain the borough's local character and heritage and seek to promote its distinctiveness (Policies CS12 and CS15). Within this context, the Council welcomes new and innovative design solutions provided that these are grounded in a thorough analysis and understanding of local character.

5.28   The Council aims to create homes which people want to live in and which they and their families can enjoy now and in the longer term. The Council will aim to provide homes which provide long term flexibility and which will meet the changing needs of occupants over time. Homes that are sensibly planned and functional; designed to meet the demands of everyday life, providing enough space and facilities for privacy and storage, will better enable residents to live comfortably and conveniently.

5.29   Space is an important determinant in the quality of a home and in providing comfort, privacy, utility and flexibility.   The provision of appropriate levels and usability of both internal and external spaces will greatly enhance the liveability of homes, particularly at higher housing densities. Higher density development leads to more intensive use of space and shared areas with implications for management, security and overall quality of life. Issues of noise, daylight, privacy and overlooking all become more acute as densities increase, requiring careful design.

5.30   The spaces between and around buildings are as important as the spaces within. Design quality is not just about the buildings or a particular architectural style, but creating places that work well from a broader urban design perspective. Developments should enhance the character and legibility of an area, integrate and connect with the wider public realm network and wherever appropriate, provide opportunities for access to open and green space.

5.31   The Council will seek to ensure that all housing in the borough is accessible to all members of the community and is adaptable to the changing needs of residents throughout their lives. In accordance with the draft replacement London Plan (2009), inclusive design and accessibility must be considered at every stage of the development process. New development will be required to meet Lifetime Homes standards and provide a percentage of wheelchair accessible homes (or which can be easily adapted).

Housing for Older and Vulnerable People

5.32   The Council is committed to promoting choice and independence for older people and the most vulnerable residents in the borough. As stated in the Sustainable Communities Strategy (2008) the Council seeks "to support and empower our most vulnerable residents to live independent, active and enjoyable lives".

5.33   The Council will continue to enable quality specialist housing to meet and support the housing need and requirements of older and vulnerable people. Older and vulnerable people include the elderly, homeless families with support needs, people with mental health problems, disabled people, people with learning disabilities, people with drug and alcohol problems, offenders or people at risk of offending, refugees and rough sleepers. The housing needs of such groups can be met through a range of uses such as sheltered housing, care homes, supported housing, hostels and other short term temporary accommodation.

5.34   The majority of care services in the Borough (85%) are provided by the Third Sector – housing associations and voluntary groups. The Council provides support to over 2,800 older and vulnerable people each year, working with 36 support providers. The Council currently provides a total of 2,676 units of which 650 units are support only services and 2,026 are accommodation based with support. The share of units in local provision is 47% for older people, 13% complex needs e.g. mental health, learning disabilities and 40% for socially excluded groups e.g. homeless people. Waltham Forest has one of the highest proportions of older people and homelessness provision in London.

5.35   As stated in the Supporting People Strategy (2010 - 2015), the Council seeks to establish, sustain and promote independent living by providing housing related support in a range of accommodation based and floating support provision. The commissioning

priorities in the Supporting People Strategy (2010-15) are to increase supported living provision for people with learning disabilities, people with mental health problems and extra care for older people.

5.36   It has been estimated that 11% of the Waltham Forest population are older people (aged 65 years and over) and a further 26% of people are aged over 50. Population projections anticipate that the number of people aged over 65 years will increase on the plan period to 2026. It is therefore anticipated that the demand for specialised and supported housing will also need to increase. The Housing Needs and Market Survey (2007) estimates that 24.2% households in the borough have someone with a disability or a long term limiting illness.

5.37   It is important that the borough's housing stock can accommodate the current and changing future needs of older and vulnerable people. Specialised housing and care services have changed significantly over the last decade with a move towards the development of more flexible models of accommodation and support that offer older and vulnerable people increased opportunities for maintaining choice and independence. In total, the Housing Needs and Market Survey (2007) suggests that the requirement for sheltered accommodation is 378 units of which 164 are in the affordable sector and 214 are in the private sector. There is also a target to expand extra care provision for older people by 75 units by 2015 [15].The Housing Needs and Market Survey (2007) also states that there will be a need to increase the level of provision for people with learning disabilities and those suffering from mental illness.

Gypsies and Travellers Provision

5.38   Government Circular 01/2006 - Planning for Gypsies and Traveller sites (2006) requires the Council to provide for the accommodation needs of Gypsy and Travellers. At present one site which has 17 pitches and a capacity of 34 caravans is located in the borough. The Council will continue to protect this site. The Council will identify whether there is a requirement for additional pitches in the borough, taking into consideration the existing supply of pitches and the level of provision in the wider sub region. Where need can be demonstrated, additional sites will be identified in future Development Plan Documents that include site allocations such as Area Action Plans and the Site Specific Allocations document. The Council will work in close partnership with developers, Registered Social Landlords and neighbouring local authorities in order to meet identified additional need. Any proposals for additional provision will involve extensive community consultation.

Implementation

5.39   In order to achieve our housing target the Council will adopt a flexible and proactive approach to maximising the amount of land available for housing development. New housing will be delivered through the development of available, suitable and achievable sites. The SHLAA (2009) and HLAA (2008) clearly demonstrate that the borough has sufficient capacity to deliver the housing target.

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15   Supporting People Strategy (2010 - 2015)

5.40 The Council recognises that economic conditions will be difficult, particularly in the early part of the plan period. At present, there is uncertainty in relation to the amount of credit available to house builders, developers, home buyers as well as the level of grant available to fund affordable housing. Such uncertainty could affect the delivery of housing. While economic conditions may be difficult in the short term however, over the medium and long term the housing trajectory anticipates that the Council will not fall short of the plan period housing target. While the market is showing tentative signs of recovery there is still the need to monitor the supply of housing very closely. This will be done through the Council's Annual Monitoring Report. The Council's housing polices have been developed to be sufficiently flexible to enable and maximise housing supply in light of changing economic conditions. Where housing supply is threatened by the economic conditions the Council will consider on site by site basis:

- The amount of affordable housing provision proposed in relation to the 'Dynamic Viability Model';
- Varying the amount of social rented and intermediate affordable housing;
- Using alternative forms of intermediate housing to take advantage of the funding and credit available;
- Securing additional affordable housing on Council owned sites; and
- Reviewing the range of S106 requirements sought to maintain viability.

5.41 The Council will seek to work with partners such as the Homes and Communities Agency (HCA), GLA , a range of Registered Social Landlords and other housing providers to secure funding for the provision of affordable housing.

5.42 Area Action Plans will be prepared for the borough's four key growth areas. These Area Action Plans will provide greater detail on the proposed regeneration of these areas and designate land, where appropriate for housing, mixed use schemes and other uses. These documents will also set out delivery programmes to enable sites to come forward.

5.43 Sites outside the Council's key growth areas will be identified in the Site Specific Allocations DPD. This document will allocate and safeguard sites for housing, mixed use and other uses.

5.44 The Development Management DPD will set out detailed policies on the design quality, density, dwelling mix, bedroom sizes, internal and external amenity space, parking, Lifetime Homes, Wheelchair Housing, residential alterations and extensions and sustainability.

5.45 Supplementary Planning Documents such as the Urban Design Guide SPD, Residential Extensions and Alterations SPD, Dwelling Conversions SPD, Inclusive Design and Access SPD and the GLA's Interim London Housing Design Guide will provide further guidance. The Council will also use 'Building for Life', 'By Design' and the Code for Sustainable Homes as tools to assess new housing planning applications.

5.46 The Council will also use Planning Obligations (S106) to secure affordable housing and ensure supported infrastructure is provided where necessary to accommodation population growth through housing provision.

Figure 9 Housing Capacity by Ward (up to 2026)
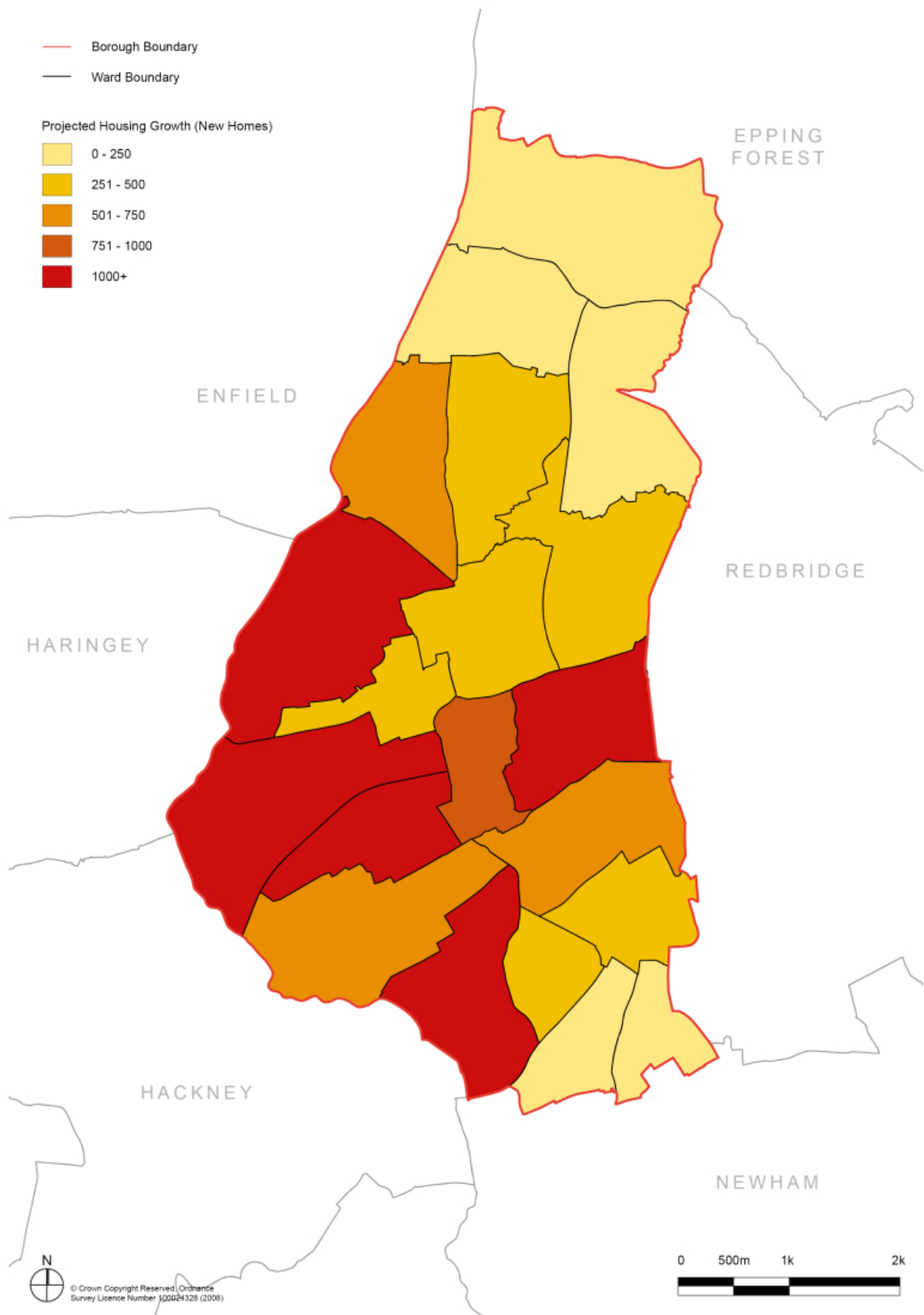
6 Policy CS3 - Making Efficient Use of Employment Land

Strategic Objective 3

Facilitate sustainable economic growth by safeguarding and enhancing an appropriate range of sites and premises to meet the demands of local businesses and growth sectors in order to attract and retain high quality services, industries and well paid jobs in the borough while ensuring residents are able to access them.

Introduction

6.1 Waltham Forest currently benefits from a large supply of employment land, with significant clusters focussed in the west and south west of the borough. The Council's Employment Land Study, conducted by URS in 2009, identified an existing supply of 151.7ha. However, much of this land has traditionally been used for industrial purposes, meaning it is not readily suitable for modern day business needs. Manufacturing has declined significantly in recent years (there was a 45.5% fall in manufacturing employment in the Lea Valley Property Market Area 1998-2006) [16], a trend that looks set to continue, particularly given the current economic downturn. Unless land is effectively managed, the borough will be left with large swathes of industrial land that are vacant and unfit for purpose.

6.2 The need to cater for population growth, whilst also protecting the borough's green assets, means that existing employment land will need to be used more efficiently in the future. Not only will it come under pressure for alternative uses such as housing, but there will also be a need to provide a greater number and range of jobs to cater for losses in manufacturing and an increased working age population.

6.3 Employment forecasts from the GLA for Waltham Forest are set out in the table below:

Table 5 Forecast employment in Waltham Forest (Source: Local Economic Assessment, Navigant Consulting, 2010)

Year	2010	2015	2020	2030
Number of jobs	59, 020	58,160	58,160	61,580

6.4 Providing a suitable range of jobs will be important both in terms of tackling worklessness, and preventing the borough further functioning as a commuter area; approximately 2/3rds of the borough's workforce already commutes out to other parts of London. [17] It will be of vital importance in realising the convergence principle that the five host boroughs take the opportunity offered by hosting the 2012 Olympics of addressing the existing challenges of deprivation.

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16   Waltham Forest Employment Land Study, URS, 2009
17   Waltham Forest Local Economic Assessment, Navigant Consulting, 2010

6.5   Land suitable for employment purposes can be difficult to provide, largely due to the potential impact it can have on the amenity of a locality. This is especially true in a densely populated urban area such as Waltham Forest. Where fit for purpose employment land exists, it is therefore important that a high level of protection is offered by planning policies. The consequence of not doing so is essentially an unsustainable pattern of growth where residents cannot access work locally.

Policy CS3 - Making Efficient Use of Employment Land

The Council will facilitate sustainable economic growth by:

Strategic Industrial Land

A) ensuring the borough has a healthy supply of land for high quality, sustainable industrial uses by promoting, protecting, and managing the Strategic Industrial Locations (SILs) defined in Figure 10, Figure 11, and Figure 12;

Borough Employment Areas

B) intensifying and upgrading existing employment land in the Borough Employment Areas set out in Table 6 to secure more jobs for local people. Within the key growth areas this could include the provision of jobs as part of a mixed use development. In such cases, priority will be given to education, health, or social infrastructure before considering other uses such as residential;

Offices

C) ensuring Walthamstow town centre is the primary location for major new office developments, whilst also recognising that several Borough Employment Areas identified in Table 6 and other centres or areas well served by public transport, offer scope for continued or enhanced office use. In such locations, office developments should be ancillary to an organisation's existing or proposed operations or be small in scale and part of a development designed to meet the needs of small businesses;

Mix of employment uses

D) encouraging a mix of employment facilities and types, including the provision of employment spaces suitable for small and medium sized enterprises, and creative/cultural industries, particularly in Borough Employment Areas;

Non designated employment land

E) taking a pragmatic approach to non-designated employment land and premises that can clearly be demonstrated to be surplus to requirements and no longer fit for purpose, so that it can be released for more productive uses. Priority will be given to mixed use developments, especially those that incorporate social infrastructure;

New employment uses

F) supporting proposals for new employment uses outside designated areas where such use would not be contrary to other policies within the plan.

Strategic Industrial Land

6.6   Some forms of employment such as manufacturing sit less comfortably alongside sensitive uses such as housing than others. They do still have an important role in providing job opportunities and supporting economic growth. Whilst the manufacturing industry is understood to be declining nationally, local evidence suggests it is a resilient sector in Waltham Forest. The Waltham Forest Local Economic Assessment,[18] found that manufacturing accounts for 6% of jobs; twice the London average. Furthermore, the borough's Employment Land Study [19] found that a high demand still exists for 'bad neighbour' developments, which could include green industries and waste management facilities. Whilst these have a huge role to play in addressing the climate change agenda, their sometimes unsightly nature means they will not sit comfortably close to existing and proposed neighbourhoods.

6.7   The London Plan advocates the protection of identified Strategic Industrial Locations (SILs) in recognition of the role such developments play in the economy, and the difficulties in identifying appropriate sites for them. Those relevant to Waltham Forest are shown in Figure 10, Figure 11 and Figure 12. The borough's Employment Land Study [20], found these to largely be well functioning industrial estates sufficiently detached from incompatible uses and with good strategic road access. One exception to this is the Lea Bridge Gas Works section of Lea Bridge Gateway, hence its de-designation as illustrated in Figure 12. The Employment Land Study found this portion of the SIL to have 'very poor access to the strategic road network, poor servicing and parking for B1, B2 or B8 uses, but well connected to the existing residential grid.'[21]

6.8   In addition, support is also provided in the Employment Land Study [22] for the de-designation of 97 Lea Bridge Road, also shown in Figure 12. Within the Employment Land Study, the site is recognised as offering 'an opportunity to create a landmark mixed use development' that would 'provide and attractive gateway to both Argall Avenue Industrial area and would create a favourable impression to people arriving in the borough from the south.' [23] Removing the SIL designation of this site would therefore aide regeneration in the Northern Olympic Fringe; which is a key component of the broad strategy for the borough.

6.9   Release of some SIL at Blackhorse Lane is also necessary. In this case, it is to facilitate regeneration plans for residential led mixed use development, which will be set out in detail in the Blackhorse Lane Area Action Plan. The area to be released for alternative uses is set out in Figure 11. This is supported by the Employment Land Study, and will be needed to ensure the quantum of residential development set out elsewhere in this

18   2010, Navigant Consulting
19   URS, 2009
20   URS, 2009
21   p100, Borough Employment Land Study, URS, 2009
22   URS, 2009
23   pp96-97, Borough Employment Land Study, URS, 2009

strategy is achievable in this growth area. It should be noted that the proposed release set out in Figure 11 is actually less than that advocated in the Employment Land Study in order to better reflect land ownership parcels and the latest regeneration plans for the area.

Borough Employment Areas

6.10   Beyond SILs there is a need to provide and safeguard smaller industrial estates that fulfil an important role in terms of local employment and business opportunities.

6.11   As traditional employment practices decline new businesses will need to be provided for, in the interests of sustainable economic growth. From the period 1998-2008 the Lea Valley Property Market experienced a 32.5% reduction in B2 employment floorspace [24]. As emerging businesses are envisaged to be more land efficient, an approach of intensifying and upgrading existing employment areas to make them fit for modern practices justifies the release of poorer quality stock to more productive uses. Indeed the Local Economic Assessment found 'a clear indication for the need to supply smaller business units going forward, which is consistent with the trend in business demographic towards smaller business sizes.'[25]

6.12   The borough's Employment Land Study [26] assessed future demand for B2 and B8 use and found that demand is likely to decline between 11.1 hectares and 24.5 hectares to the period to 2026. Existing employment clusters were also assessed, and recommendations made of where land should be safeguarded and where a more flexible approach may be taken.

6.13   Beyond the SILs discussed above, a number of employment clusters were found to be suitable for continued B2 and B8 use, due to matters such as reasonable quality buildings, servicing and access arrangements. Aligning this with alternative regeneration goals has informed the designation of sites identified in Table 6 as Borough Employment Areas. By protecting these, along with SILs, and taking a pragmatic approach to non designated employment land, a sufficient supply of employment land to meet future demand will be maintained.

6.14   Whilst in their current form designated Borough Employment Areas can continue to function effectively, if further enhancements to matters such as surfacing, lighting, and landscaping are secured, they have the potential to attract skilled jobs with a higher number of workers to floorspace ratio. Regeneration efforts in the borough's key growth areas will mean that there will be particular opportunities for such intensification here, and as such an element of mixed use development may be supported where this does not undermine the overall employment function of the area. Such an approach is consistent with the recommendations of the Employment Land Study.[27] Furthermore, as these areas will be the key focus of population growth in the borough, they will experience the greatest pressure on essential infrastructure such as education and health facilities. For this reason, and since such infrastructure will also create jobs, employment led schemes that incorporate social infrastructure will be favoured over residential led mixed use.

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24   Waltham Forest Employment Land Study 2009, URS
25   p87 Local Economic Assessment, Navigant Consulting, 2009
26   URS, 2009
27   URS, 2009

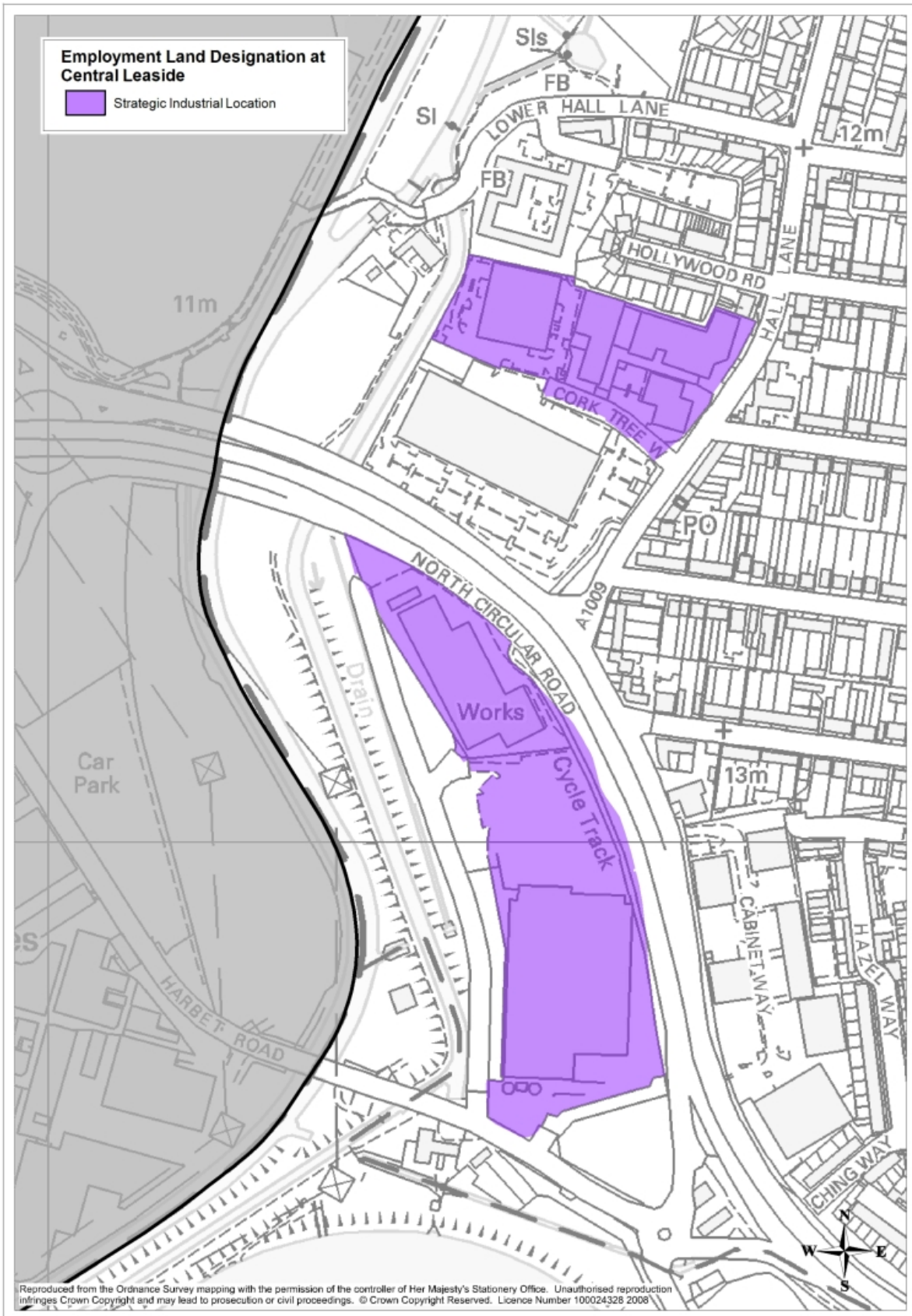**Figure 10 Central Leeside Strategic Industrial Location**

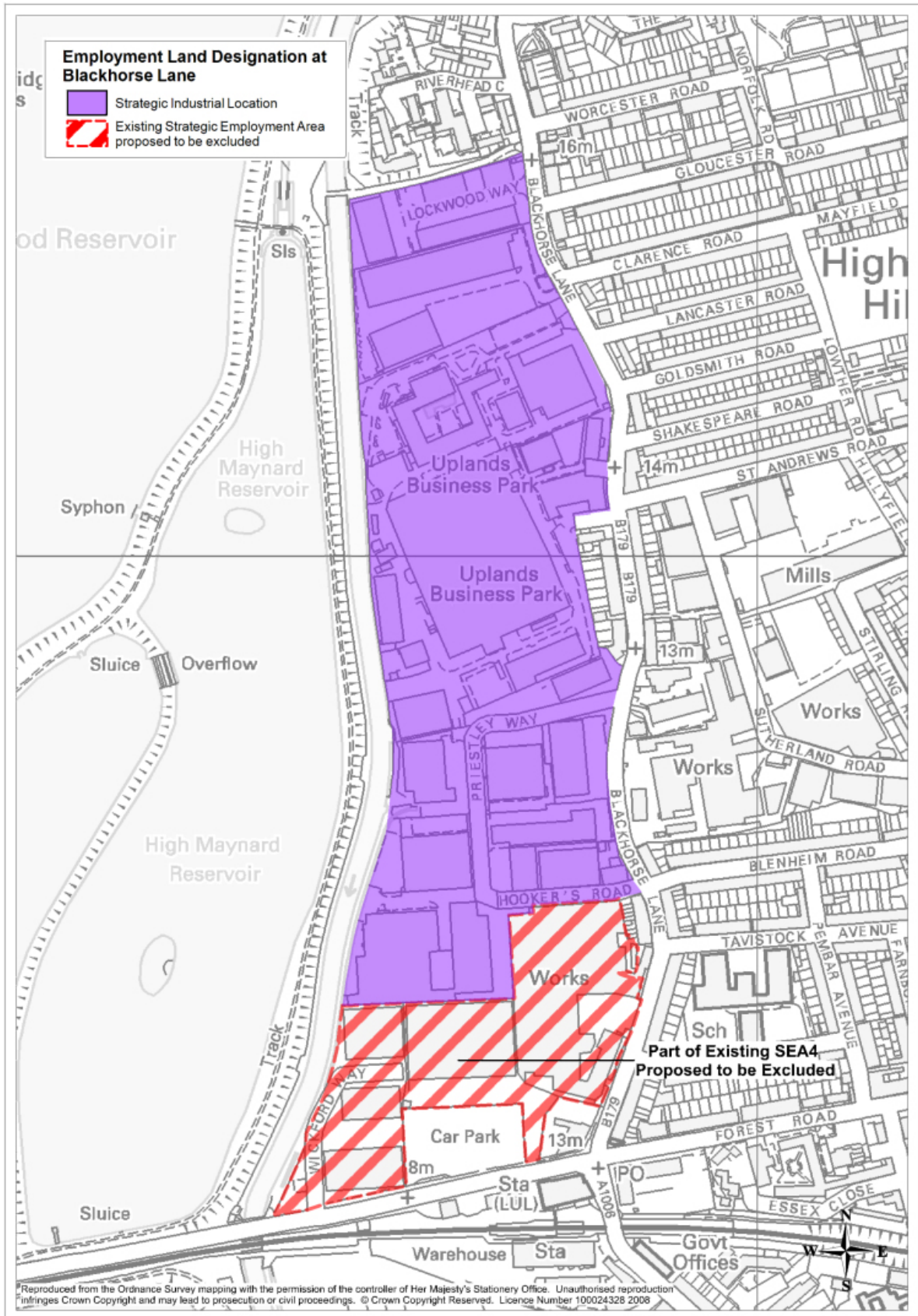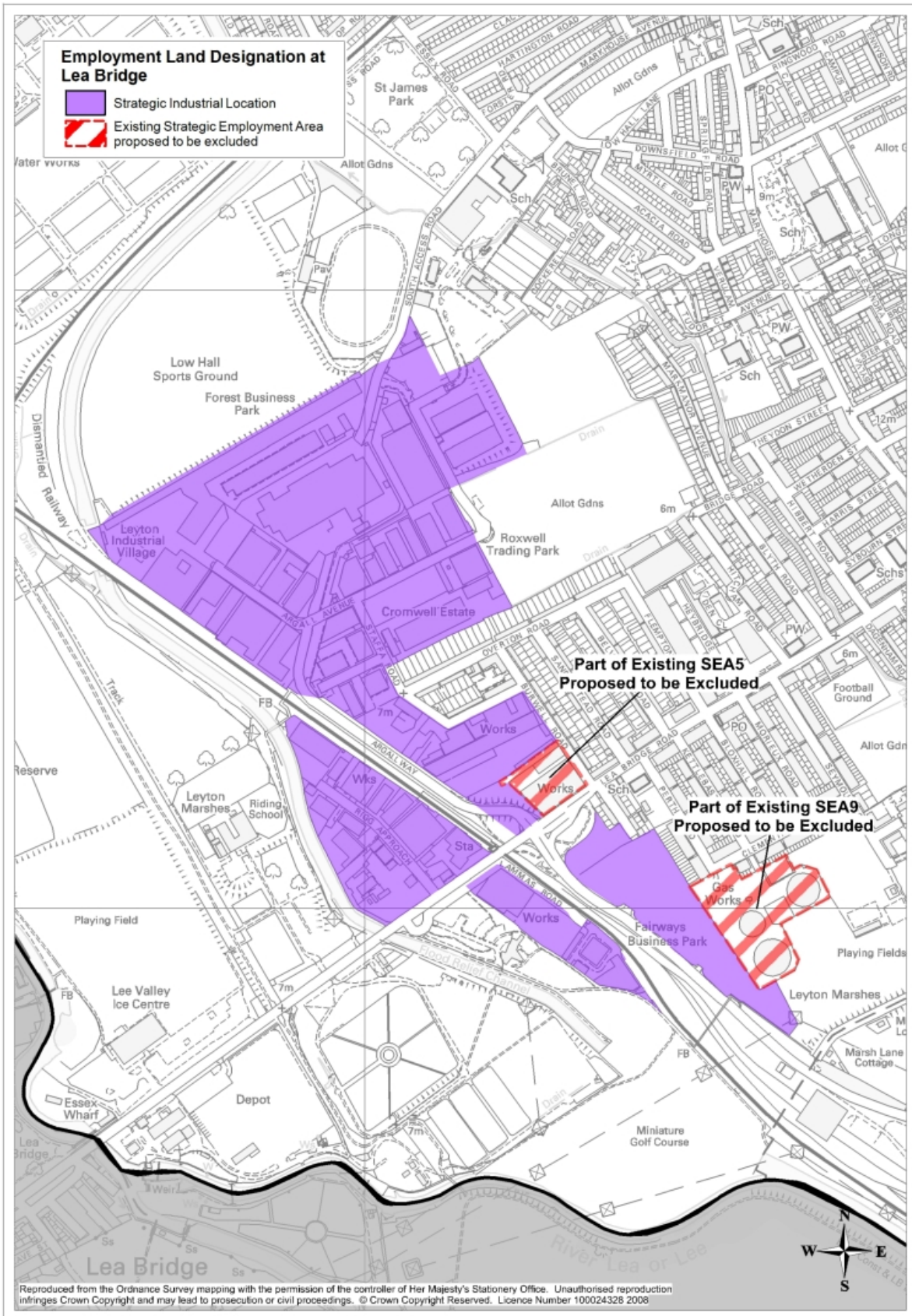**Figure 11 Blackhorse Lane Strategic Industrial Location**

Figure 12 Lea Bridge Gateway Strategic Industrial Location

6.15   A further opportunity presented in upgrading employment areas will be to address climate change through the design of new buildings, as set out in Policy CS5.

6.16   The Borough Employment Areas identified in Table 6 are largely focussed in areas of the borough that are within the 20% most deprived Lower Super Output Areas in the country. The approach is therefore consistent with the London Plan requirement that regeneration is focused into deprived areas, and Policy EC2 of Planning Policy Statement 4: Planning for Sustainable Economic Growth, which states that sustainable economic growth should be prioritised towards deprived areas, previously developed land, and take account of both existing and emerging business sectors.

Table 6 Borough Employment Areas

Site	Site
1) Howard Road	13) Highams Road
2) Sherrin Road	14) Montague Road and Courtenay Road Arches
3) Auckland Road	15) Temple Mills Lane
4) Dunton Road	16) Cabinet Way
5) Eltoe Road/Simmonds Road	17) Joseph Ray Road*
6) Church Road	18) Hainault Road*
7) Heybridge Way	19) Hatherley Mews*
8) Argall Avenue Extension	20) Lancaster Road Arches*
9) Sutherland Road	21) East London Office Centre*
10) Clifford Road	22) Barrett Road*
11) Waltham Park Way	23) E10 Business Centre*
12) Justin Road	

*(NB Borough Employment Areas marked with a * are those with suitable site characteristics for potential or continued small scale office use)*

Offices

6.17   Office use in the borough has risen from a low base in 1986 by 81% by 2004, with demand largely for cheap units, rather than specific locations. **(28)** However, there is still a low supply that needs to expand to meet the needs of local businesses. Indeed the URS study forecast an increase in net demand between 3.1 and 3.7 hectares by 2026; largely through small and medium sized enterprises (SMEs).

6.18   Whilst ancillary office development is permissible within existing industrial estates, Planning Policy Statement 4: Planning for Sustainable Economic Growth, states that standalone offices are a town centre use and should be directed towards existing centres and areas well served by public transport. As the major town centre in the borough, it is expected that Walthamstow town centre will accommodate much of this growth. In addition, the URS study found that a number of other employment sites within the borough either currently include or have the capacity to accommodate new offices.

6.19   Relevant Borough Employment Areas, which will also be suitable for other employment purposes, are identified in Table 6. Identified sites largely benefit from good public transport links and are surrounded by residential areas. It is these characteristics that mean the sites lend themselves towards office use. The inclusion of these locations as appropriate for small scale office development reflects the fact that office demand in the borough will largely be for small, cheap units to support the growth of start-up companies and office based SMEs/ creative industries rather than premium office space for the financial sector that will continue to be more attracted to locations such as Tower Hamlets and Central London.

Mix of Employment Uses

6.20   It is important to plan for a range of employment types, both to avoid becoming overly dependent on one sector of the economy, and also to provide for a range of jobs for residents. Realism in terms of skills levels of residents, and competition from neighbouring areas is also needed. For example, the Local Economic Assessment **(29)** found that in terms of real estate and business services, Waltham Forest lags well behind the rest of London (18% of jobs compared to 27.3%), but has a strong presence of sectors such as wholesale and retail, manufacturing, and health and social work. Whilst there is scope in the borough for a growing office sector, as mentioned above this will be of a different nature to the types of office space attracted to Tower Hamlets and Central London.

6.21   Creative industries are a growing sector of the economy and are highly established in areas of East London. They are defined by the Department of Culture Media and Sport as '*those 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.* **(30)** Sectors include: advertising, architecture, designer fashion, music, computer software development, film and photography.

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28   URS Employment Land Study 2009
29   Navigant Consulting, 2010
30   DCMS, Creative Industries Mapping Document, 2001

6.22   Twelve percent of London's workforce is already employed in the creative sector which accounts for over half a million jobs. [31] There is the potential for Waltham Forest to attract industries of this kind, especially those which are attracted by lower rents away from the city fringe. This will be particularly important given the Local Economic Assessment [32] findings that the borough is unlikely to be able to attract new large employers. Growth in the creative sector is predicted to occur in the Lower Lea Valley, particularly around the Olympic site in Stratford, Hackney Wick and Fish Island. It is therefore important to maximise the borough's potential to play a role in this continued eastern migration and become a desirable location for creative/ cultural industries. To enhance such opportunities, it will be important to provide attractive, high quality, affordable sites and premises with high speed internet connections, that are flexible to expansion. This will also help ensure thriving businesses are retained in the area.

6.23   Small and Medium Enterprises (SMEs) currently account for approximately 1/5th of the borough's workforce. [33] As these cover a variety of businesses, a degree of overlap exists between creative/ cultural industries and SMEs. Both potentially offer stronger local employment links than large multinational firms that are often not labour intensive and as such their growth should be encouraged. In addition to potential at key growth areas such as Blackhorse Lane, there are approximately 300 railway arches in the borough that could provide industrial/workshop/storage space. [34]

6.24   The limited attractiveness of existing industrial land to office developers means some B8 intensification will be necessary to counteract losses in the manufacturing sector. Several sites benefit from the broad locational requirements of such users, and as such the Waltham Forest Employment Land Study 2009 recommends several sites for B8 intensification. The total area of these sites equals 15.2 hectares, which is sufficient to accommodate up to 4.8 hectares of additional intensified employment land use (the projected maximum increase in demand of B8 uses to 2026).
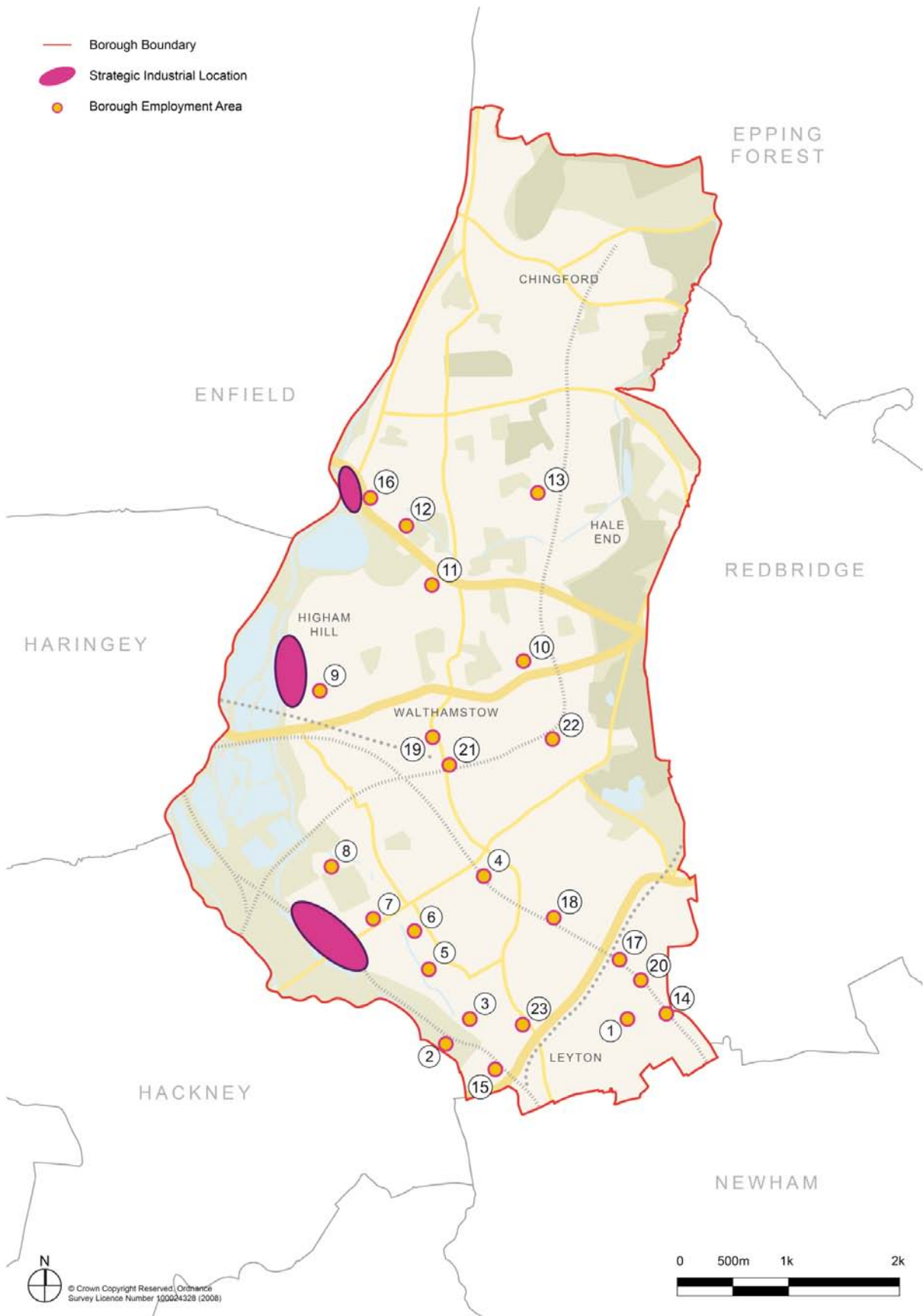
31   Working Paper 22: London's Creative Sector: 2007, GLA Economics
32   Navigant Consulting, 2009
33   Waltham Forest Employment Land Study, URS, 2009
34   Waltham Forest Employment Land Study, URS, 2009

Figure 13 Broad location of employment sites

NB numbers should be read alongside Table 6 for individual site names

Non Designated Employment Land

6.25 PPS4: Planning for Sustainable Economic Growth, advocates a flexible approach to employment land provision in recognition of the legacy of industrial decline and the need to provide land for new homes, social infrastructure etc.

6.26 The 2009 URS Employment Land Study examined a range of growth scenarios, all of which indicate a reduction in demand for industrial land as manufacturing is displaced by more land efficient employment. The estimated reduction in demand to 2026 is between 11.1 hectares and 24.5 hectares.

6.27 A careful balance needs to be struck between protecting and releasing land to more productive uses, to prevent the borough functioning merely as a commuter belt. Policy points A-C sets out the Council's approach to its most valuable employment land. Outside of these areas, there may be greater scope for the release of existing employment land. There is still a presumption in favour of employment uses in such areas though; hence the requirement for developers to demonstrate it is no longer suitable for employment. Furthermore the preference towards mixed use schemes including ones incorporating social infrastructure means that some employment generating uses are likely to continue to be provided on these sites.

6.28 Preference is given to schemes incorporating social infrastructure since planned growth will result in an increased demand for schools, health facilities, libraries, leisure facilities etc, as set out in the Council's Social Infrastructure Needs Assessment. [35] Redundant employment land may provide a suitable location for such uses, which cannot easily be incorporated into more densely populated urban areas. Meanwhile, if satisfactory residential conditions can be achieved, this can provide an important enabler to mixed use developments.

New Employment Uses

6.29 It is recognised that over the plan period, unforeseen opportunities for new employment uses may emerge outside of designated employment areas. Where these are easily accessible by public transport, and the proposals have no adverse environmental impact, the economic benefits of such proposals justifies taking a positive stance towards them.

Implementation

6.30 The Development Management Policies DPD will provide further guidance on uses appropriate in designated employment areas. SIL designations are shown in Figure 10, Figure 11, and Figure 12. The broad location of Borough Employment Areas is shown in Figure 13. Detailed boundaries will be provided in the Proposals Map DPD.

6.31 It will be important to ensure that new employment uses include the highest possible environmental standards. Whilst all Core Strategy policies should be read together, particular regard should be paid to CS1(A).

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35   URS, 2009

6.32 Should any boundaries to designated sites need amending to facilitate wider regeneration objectives this will need to be justified through improvements and intensification of remaining land, and will be co-ordinated through future Area Action Plans.

6.33 The Council will support the designation of Business Improvement Districts (BIDs) within regeneration areas to help to galvanise more individual business owners and managers to improve the competitive environment of their areas. There is already a strong interest to establish further BIDs in Walthamstow Central and Blackhorse Lane. These business-led bodies have the potential to generate new revenue streams in addition to their business rate levy and develop new locally delivered business growth services using these resources.

6.34 Guidance on justification required for the release of non designated employment land will be set out in the Development Management Policies DPD. This will include matters such as what uses may be deemed appropriate, and what mitigation for the loss of such land is required.

6.35 The Council will monitor release of employment land through the Annual Monitoring Report to ensure a suitable balance is maintained between release of traditional employment land and an increase in supply of other employment generating uses that are more land efficient.

6.36 The policy will be implemented in accordance with the Action Plan stipulated in the Waltham Forest Strategy for Enterprise, Employment & Skills. The Action Plan sets out partners, funding, timescales and outputs for the following:

- Supporting growth potential sectors and strengthening business leadership;
- Supporting SME growth and self employment;
- Improving the borough's infrastructure and environment;
- Improving skills and supply what employers need;
- Targeting low employment localities and disadvantaged populations; and
- Improving the borough's skills base to ensure that residents can benefit from new economic opportunities.

6.37 A marketing campaign, as outlined in the Waltham Forest Strategy for Enterprise, Employment & Skills, will be implemented that demonstrates the borough's niche industries, attractive town centres, improved business parks, transport accessibility and a ready, employable workforce. This will particularly target potential investments that will boost the creative sector, retail, leisure, personal and business services.

7 Policy CS4 - Providing Infrastructure

Strategic Objective 4

Ensure the timely delivery of appropriate infrastructure to strengthen the community, and reduce existing deprivation, and ensure a well functioning Borough.

Introduction

7.1 The predicted increase in the Borough's population over the next 20 years will create pressure on the existing infrastructure within the Borough. Therefore, the Council needs to ensure that the appropriate level of infrastructure is provided to meet the growth and change in population. The provision of appropriate infrastructure, particularly social infrastructure, will also be important in addressing existing problems around access to employment, education and other facilities, which contributes to deprivation in the Borough.

7.2 This policy refers to all aspects of infrastructure in the Borough including the green, social and physical infrastructure. Green infrastructure refers to the green and open spaces in the Borough. The provision of green infrastructure is covered in more detail in Policy CS6 (Green Infrastructure and Biodiversity). Social infrastructure represents a wide variety of services that are essential to the sustainability and wellbeing of a community. The Council defines social infrastructure as the following services and facilities:

- Educational facilities including early years education, primary education, secondary education, further education, adult learning (refer also to Policy CS9),
- Health services including primary and secondary health care,
- Facilities for the emergency services - Police, Fire and Ambulance,
- Sports and leisure facilities including swimming pools, sports halls and outdoor sports spaces;
- Libraries,
- Job brokerage centres,
- Community Space and Faith Facilities,
- Meeting rooms and halls,
- Public houses.

7.3 These services and facilities and infrastructure are essential to ensuring cohesion, participation and well being in the community. Physical infrastructure refers to the following elements:

- General utilities (water, energy and telecommunication)
- Foul and surface water drainage (sewerage and flood risk)
- Waste management facilities
- Emergency services (police, ambulances and fire).

7.4 The Infrastructure Delivery Plan is attached as Appendix 1. This shows how the Council will co-ordinate with its partners to provide the appropriate infrastructure, include social, green and physical infrastructure to meet the needs of the existing and future populations.

Policy CS4 - Providing Infrastructure

The Council will ensure that while encouraging housing and growth in the Borough, appropriate infrastructure is provided to cater for the needs of existing and future populations, by:

A) resisting the loss of and promoting the enhancement of existing social infrastructure facilities;

B) maximising opportunities to deliver additional facilities as part of new developments, particularly on surplus employment land in line with Policy CS3;

C) encouraging multi-purpose facilities that provide a range of services;

D) ensuring that new facilities are located appropriately to cater to the communities they serve and are accessible by walking and cycling;

E) requiring new developments to contribute towards the provision of social infrastructure, with contributions being either on-site or through planning contributions; and

F) ensuring that appropriate physical and utility infrastructure is provided where it is required by new development.

Social Infrastructure

7.5 Social infrastructure is essential in providing people with better life opportunities and reducing levels of deprivation. The delivery of appropriate social infrastructure is a major priority for achieving the vision of this document, particularly recognising the projected population growth in the Borough over the life of the Core Strategy.

7.6 Planning Policy Statement (PPS) 12 – Local Spatial Planning requires planning authorities to place infrastructure planning at the heart of the planning process, in recognition of the importance of social infrastructure to sustainable communities.

7.7 If the Council is to develop more homes for people in the Borough, whilst creating a genuinely sustainable community, the social infrastructure must meet people's needs and aspirations. The provision of essential services and infrastructure within the Borough will therefore help to promote a community that caters to people's essential needs, whilst also ensuring that the borough is attracting and retaining workers and families.

7.8   The quantity, quality and accessibility of social infrastructure such as libraries, health facilities, community and faith centres, emergency services and educational services, will often directly contribute to the quality of life within the Borough. Without the necessary infrastructure in place, the vital needs of residents can be neglected, reducing the quality of life and making Waltham Forest unattractive to residents as well as potential newcomers.

7.9   Social infrastructure is also essential in providing people with better life opportunities and reducing existing social deprivation. Waltham Forest has been identified by the Department of Communities and Local Government's Index of Multiple Deprivation as suffering from significant levels of deprivation with areas of crime, worklessness, poor health and low income. In many areas these levels of deprivation are defined geographically, with the south of the borough having significantly higher levels of deprivation than the northern parts of the Borough. As such, future development should consider the quality and distribution of a wide range of social services as a means of bridging the gap between the relative quality of life in these areas.

7.10   The GLA's annual housing target for new dwellings for Waltham Forest, and the identification of housing delivery and development sites, will have a direct impact on the capacity of existing infrastructure. The Borough's Strategic Infrastructure Plan (2009) assessed the future requirements for all types of infrastructure, including social infrastructure. It looked at a range of population scenarios to determine the infrastructure required to support a happy and healthy community. This study found that the infrastructure areas of education and health required significant and co-ordinated investment in order to be able to meet the needs of future populations, as well as coordinated work to find sites for new facilities. With regard to these types of infrastructure, existing deficiencies were compounded by population growth.

7.11   As such, wherever possible, the capacity of social infrastructure should be increased to reflect the inevitable increase in demand as new people move into the borough. In the case of expansion of existing facilities required to meet the need of additional housing, this will be negotiated through planning obligations.

7.12   It will be very important to safeguard sites for future education, health and community service needs and also to protect existing sites and premises. Furthermore, community facilities and services need to be located in the right places so that they have maximum accessibility for their potential users, some may be best located in town centres whilst other services and facilities may be better located close to the communities.

Educational Facilities

Educational provision is a key element of social infrastructure. The Council aims to provide a high standard of education and training for everyone through the borough's network of schools, youth centres, arts and recreational facilities. The Council will work with our partners, such as the higher and further education colleges and universities, neighbouring authorities and the community and voluntary sector, to ensure that suitable services and facilities for education and training are provided. Policy CS9 deals specifically with the provision of education facilities in the Borough.

Health Services

7.13   The Council works with the NHS to provide health facilities. Planned investment in General Practitioners includes 6 new or refurbished primary care centres to be provided in deprived areas **(36)**. For dentists, there is approximately 2,223 residents per dentist, which is below the Department of Health (DoH) standard of 2,000 residents per dentist. URS estimates show that there is a need for 10.1 dentists over the period 2009-2026, in order to plan for new population growth in line with the DoH standard.

Sports and Leisure Facilities

7.14   There are currently three public swimming pools in the borough and two pools at private health clubs. The Sports and Leisure Report: Assessment of Need and Options Appraisal (2007) calculated that there is an existing deficit of provision and that there would be a need to provide 696 sqm of water space (two six-lane 25m pools) over the period to 2016. Waltham Forest's residents will benefit from the legacy of the London 2012 Olympic and Paralympic Games with the £244 million Aquatics Centre. For indoor sport halls, there are 9 existing accessible sports halls in Waltham Forest. The Sports and Leisure Report: Assessment of Need and Options Appraisal (2007) calculated that there is an existing deficit of provision (of approximately 2.9 sports halls) and there is a need to provide four new sports halls over the period 2016 **(37)**.

Libraries

7.15   The Council is developing greater efficiencies from their current building stock. This trend is likely to continue and allied with changing patterns of service delivery the expectations are that new demands from population growth can be met without the need for additional sites **(38)**.

Job Brokerage Centres

7.16   Waltham Forest operates a job brokerage initiative, which 6,000 residents are currently registered (Worknet) in addition to the mainstream services that are provided at the 2 Job Centre Plus outlets in the borough. The URS study further identified a shortage of space available for employment brokerage services, particularly in the northern part of the borough.

Community Spaces and Meeting Places

7.17   Waltham Forest has many meeting places, churches, synagogues, temples, community facilities and prayer centres that cater for a range of faiths and beliefs. The Council will seek to support community organisations and religious groups to help them to meet their need for faith facilities. Greater efficiencies can be achieved from the current building stock before new space is proposed **(39)**.

7.18   Wherever possible, working with service providers, the Council would ensure that the capacity of social infrastructure is increased to reflect increases in demand as new people move into the borough. Where new development generates demand on social infrastructure, planning obligations would be used to ensure infrastructure provision.

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36   Strategic Infrastructure Plan, URS, 2009
37   Strategic Infrastructure Plan, URS, 2009
38   Strategic Infrastructure Plan, URS, 2009
39   Strategic Infrastructure Plan, URS, 2009

7.19   Allocating sites for social infrastructure can be an issue in a built up area such as Waltham Forest. As such, it will be important to safeguard sites for future facilities and also to protect existing sites and premises.

Public Houses

7.20   East London has a long tradition of having pubs as neighbourhood focal points for the community. Nationally, over the last few years, pubs have been closing at a record rate resulting in job losses and millions of pounds lost to the national economy. However, pubs can be the heart and soul of a community providing meeting spaces, entertainment venues etc. Local pubs have been shown to be the most vulnerable in the economic downturn. This policy also seeks to manage the loss of pubs and other community facilities, particularly where their loss would represent a cultural loss to the local community. The Development Management Policies Document will provide further details of the management approach to be applied.

Physical and Utility Infrastructure

7.21   Utilities, waste management facilities and emergency services are essential for development to go forward and for communities to adapt to a growing population. However, strategic planning for their delivery can prove challenging. The primary, if obvious, reason for this is that local planning authorities are not directly in charge of planning for the provision of utilities and physical infrastructure. Utility providers are private companies that operate in a private market, albeit heavily regulated to ensure that the incentives to under provision are minimised, where they contract arrangements directly with their end users.

7.22   However, the Council will work closely with utilities providers to ensure that they are aware of upcoming development and development targets, so that consideration can be made for future requirements.

Implementation

7.23   It is envisaged that the implementation of this policy will be through the planning process with a collaborative approach between the Local Strategic Partnership and the Council to deliver the Strategic Infrastructure Plan and ensure the needs and requirements of the local community are met with appropriate provision.

7.24   In terms of identifying appropriate sites for new social infrastructure, this will largely be through Area Action Plans and Site Specific Allocations DPDs. All such documents will be produced in collaboration with appropriate service providers to ensure their requirements are met and the necessary infrastructure to support growth is provided. Given that Area Action Plans will co-ordinate developments in the key growth areas, these will be particularly important tools in identifying appropriate sites. In addition, unforeseen opportunities may arise on underused employment land as set out in Policy CS3.

8 Policy CS5 - Minimising and Adapting to Climate Change

Strategic Objective 5

Ensure high environmental standards of development and sustainable resource management and efficiency to support the long term sustainability of our environment and respond to climate change in a practical and effective way.

Introduction

8.1   Climate is critical to the world as we know it. There is now scientific evidence that over the past decades the climate has been changing at unprecedented rate and magnitude due to greenhouse gas emissions, in particular carbon emissions, resulting from human activities.

8.2   The need to respond to climate change has become a serious challenge for Government and the community and its potential implications for the natural and built environments are widely recognised. While climate change is not specific to Waltham Forest, the borough is, as the rest of London and the UK, feeling the effects of climate change and is experiencing hotter, drier summers and wetter, milder winters with extreme weather incidences occurring more frequently and with greater magnitude. Waltham Forest Council needs to contribute to reducing the potential severity of these impacts, while also responding appropriately to these issues of risk, with measures taken to adapt to climate change and to safeguard the Borough for the future Waltham Forest.

8.3   While some change of climate is inevitable due to the emissions that have already occurred over the past decades, minimising climate change and its environmental impacts is particularly important. This is a particular challenge in the light of the anticipated growth in Waltham Forest, but the scale of regeneration in the borough also offers the opportunity to ensure that new developments create sustainable neighbourhoods that showcase high environmental quality.

8.4   Today, climate change is widely recognised as one of the greatest long-term challenges facing the world. Rising to this challenge is a theme throughout the whole LDF and there are a number of relevant policies that address this challenge, including those on green infrastructure and biodiversity (CS6), waste management (CS7), and transport (CS8). While these themes are important considerations individually, their relationship is interdependent.

8.5   Waltham Forest Council is committed to ensuring through the planning system that our finite resources will be managed responsibly and that high environmental standards will be delivered throughout the borough to meet national, regional and local targets of addressing climate change.

Policy CS5 - Minimising and Adapting to Climate Change

The Council will tackle climate change locally and promote resource efficiency and high environmental development standards during design, construction, and occupation of new developments by

Reduction of Carbon Emission

A) requiring new developments to minimise on site carbon emissions across their lifetime in accordance with the energy hierarchy by using less energy through responsive design, supplying energy efficiently and using on-site renewable energy;

B) requiring developments to meet high environmental standards of building design and construction, including targets based on standards such as BREEAM and Code for Sustainable Homes;

C) encouraging retrofitting of the existing building stock to become more energy efficient by utilising existing and future programmes to co-ordinate and drive activity;

D) 'leading by example' and seeking to exemplify high sustainability standards and reduced carbon footprint on the Council's and its partner's own development areas and buildings and leading on awareness raising campaigns;

Energy Efficient Supply

E) working with partners and developers to promote and facilitate the delivery of local decentralised energy capacity and networks, especially district heating systems in appropriate areas of the Borough, in particular in the key growth areas;

F) promoting innovative energy technologies that reduce carbon emissions and use of fossil fuels, such as hydrogen and energy from waste sources in appropriate locations;

Adaptation, Water Efficiency and Flood Risk

G) requiring developments to be designed in a manner that minimises the use of water, protects the water environment and minimises the potential for flooding and the urban heat island effect;

H) directing development away from areas at high risk from flooding and aiming to achieve an overall reduction in flood risk; requiring sequential and exception test and flood risk assessments (FRAs) in accordance with requirements set out in PPS25; and

I) improving the sustainability of buildings against flood risk, water stress and overheating, in order to not put people or property at unacceptable risk.

8.6   Addressing climate change in an effective way will require substantial changes to the way we use and manage our resources. New development will need to be well designed and existing buildings need to be improved to avoid negative impacts on environment and minimise use of limited resources. The Council has set the course for reducing carbon emissions in the borough and encourages residents, employees and communities to fully contribute to achieving our carbon reduction targets to benefit from a low-carbon borough.

8.7   Compared with the 33 London boroughs, Waltham Forest has the 6th lowest overall emissions, the 5th lowest total emissions per capita and the 18th lowest domestic emissions per capita. Residential and commercial activities, excluding transport were shown to contribute to a significant portion of the boroughs total carbon emissions (71%). Recognising previous achievements, the Council is committed to improve its carbon footprint even further in the future. [40]

8.8   In 2008, Waltham Forest adopted its Climate Change Strategy which set locally specific target of 40% reduction in carbon emissions by 2025 against 2005 levels. This will deliver carbon emissions in line with the Mayor's target of 60% reduction by 2025 against 1999 levels.

8.9   In order to achieve the set carbon reduction targets and minimise climate change, the compliance of new developments with other Core Strategy policies on land use and transport (CS8), waste management (CS7) and biodiversity (CS6) is crucial.

Energy Efficiency and Reduction of Carbon Emission

8.10   The Council will seek to minimise and mitigate climate change by requiring development to incorporate the three aspects of the energy hierarchy of the London Plan: Firstly reducing the demand for energy (lean option), secondly supplying energy in the most efficient way (clean option) and thirdly using renewable energy sources (green option).

8.11   The Waltham Forest Climate Change Evidence Base (CCEB) report suggests in order to achieve the greatest carbon reductions across the Borough, demand reduction (lean) should be focused across the Borough, with retrofitting and building improvements applied to oldest and least efficient stock as a priority, with improved supply efficiency (clean) focused in areas of highest development density, and renewable technologies (green) encouraged throughout the Borough.

8.12   The Council will seek new developments to be laid out and designed to minimise energy demand during both construction and occupation and will require developments to achieve high feasible environmental standards. This includes consideration of the development's internal heating, cooling, lighting, and power appliances. The Building Research Establishment's Environmental Assessment Method (BREEAM) and the Code for Sustainable Homes provide helpful assessment tools. Further guidance on these tools and on measures that contribute towards achieving the policy requirements are provided in Waltham Forest's Development Management Policies and Supplementary Planning Document on Sustainability and Climate Change.

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40   2008 NI 186 data

8.13 However, improvements in construction standards of new development alone will fail to achieve carbon reduction targets, and without action, existing development will continue to be a large contributor of carbon in the Borough. Based on anticipated growth, existing housing development is expected to account for approximately 84% of total housing in 2026 and existing non-residential development for approximately 95% of total non-residential development in 2026. A key consideration in achieving carbon reduction targets will therefore be existing development in the Borough. The Council encourage homes owners to improve the existing building stock and seeks to minimise the carbon footprint of its own building stock. Whilst seeking opportunities to reuse and modify heritage assets to mitigate and adapt to climate change, the Council will seek to protect the significance of the heritage asset and its setting. [41]

Low- and Zero-Carbon Energy Generation

8.14 Once a development has been designed to minimise energy demand, a development needs to demonstrate how it can meet its remaining energy needs in a low or zero-carbon way. The draft London Plan requires 25% of the heat and power used in London to be generated through the use of localised decentralised energy systems by 2025 and about 5% from renewable energy sources.

8.15 The density of Waltham Forest's built environment and the lack of large scale renewable energy opportunities together make decentralised energy and Combined Heat and Power (CHP) particularly important for delivering carbon reduction targets in Waltham Forest. CHP combines electricity generation with heat production processes and is therefore highly efficient way of generating useful energy.

8.16 Waltham Forest has been working with the London Development Agency (LDA) to investigate opportunities of establishing decentralised energy as part of the London Heat Map tool and is keen to liaise with stakeholders, developers and land owners inside and outside the borough to facilitate the delivery of decentralised energy networks. The Council will work with partners to explore opportunities for establishing subregional decentralised energy networks including the Olympic and the Upper Lee Valley Opportunity Area.

8.17 Initial analysis undertaken as part of the heat mapping study indicates that the key growth areas of Blackhorse Lane, Northern Olympic Fringe, Walthamstow Town Centre, and Wood Street are likely to support the creation of a viable decentralised energy network. In contrast, in the north of the Borough, lower density development and limited new development has indicated decentralised energy is unlikely to prove viable as a network, however there may be some opportunities for stand alone systems. Developer will be required to analyse the London Heat Map in order to identify opportunities for establishing or linking into existing or proposed decentralised energy network.

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41   Planning Policy Statement 5

Figure 14 London Heat Map
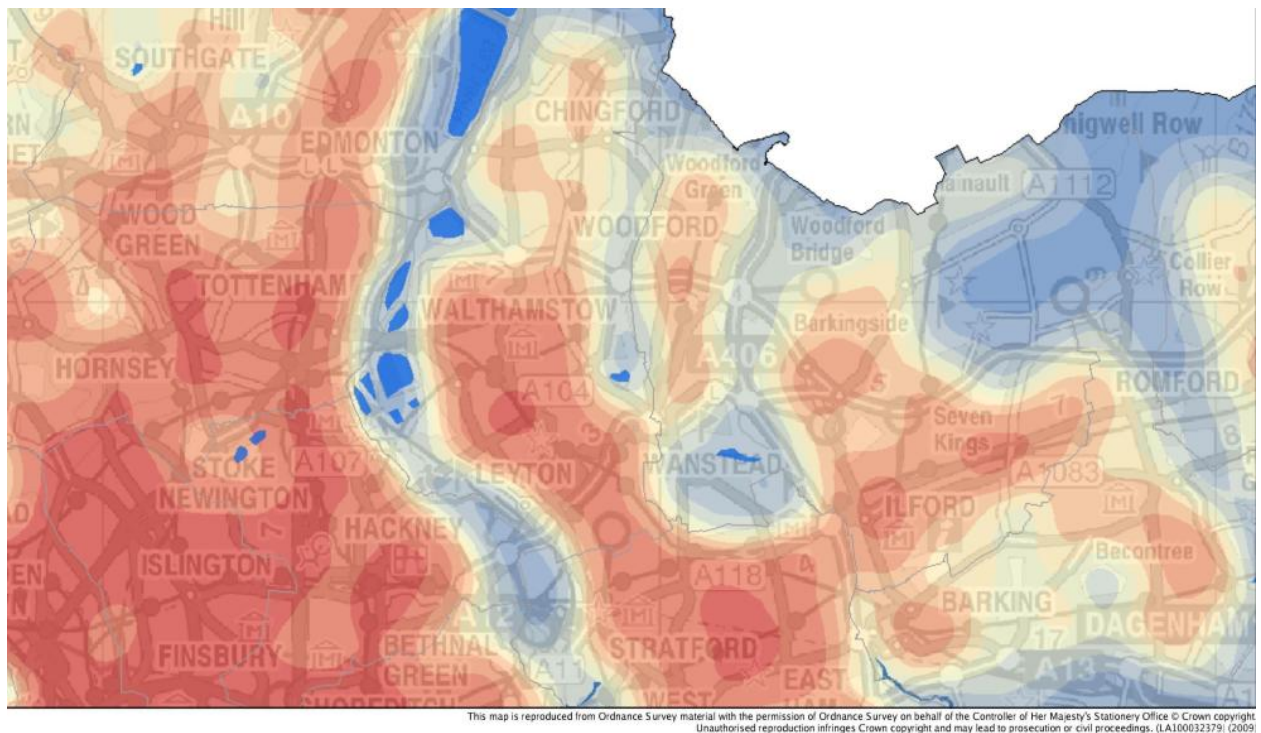
NB Colours indicate heat demand with dark red indicating high heat demand and blue colours indicating low heat demand

8.18   The Borough has 13 existing CHP plants, of which 6 are not currently operational. As part of the delivery of a decentralised energy network within the Borough, the Council will seek to facilitate improvements to these systems and connection to a wider network where appropriate.

8.19   Importantly, decentralised energy infrastructure should be identified and constructed to allow future networking opportunities. Decentralised energy infrastructure should also be implemented to enable adaptation to more sustainable fuel sources as they become available in the future. In particular the Council welcomes opportunities to generate heat from waste and encourages developers to explore this opportunity.

8.20   Whilst recognising the benefits that CHP systems provide in terms of achieving carbon emissions and fuel savings, the Council is also aware of the impact that CHP systems have on air quality through emissions of nitrogen dioxide and particulate matter. These pollutants are of local concern and are controlled under the European Air Quality Directive and the Air Quality Standards (England) Regulations 2007.

8.21   The whole of Waltham Forest is an Air Quality Management Area (AQMA) and the Council will seek to minimise impacts on local air quality. The Council will therefore assess the benefits of CHP on a case-by-case basis in light of impacts on local air quality and will encourage the use of renewable sources where feasible. Developments incorporating biomass and CHP systems will be required to undertake an emissions assessment prior to applying for planning consent and to show continued compliance with emission limits, if permission is granted. Further details will be provided in the emerging Development Management Policies.

8.22   The Council expects that major developments will seek to reduce carbon dioxide emissions through the use of renewable energy generation. Only limited opportunities have been identified within Waltham Forest for large scale renewable energy generation for example from wind, solar or geothermal sources. The greatest opportunity for larger renewable energy is seen to be through the use of renewable fuel sources for CHP [42].

8.23   In addition, opportunities have been identified for on-site micro-generation renewable systems, such as small scale wind turbines, photovoltaic solar systems, ground-source heat pumps and solar water heating systems. The impacts of some micro generation renewable systems on local amenity will need to be considered before approval. The use of biomass for energy generation is the least favourable option of renewable energy sources, due to its negative impacts on air quality. Where biomass is the only feasible option, the Council will require an emissions assessment as outlined above.

8.24   Further detail on the use of renewable sources will be provided in the emerging Development Management Policies and the emerging Sustainability and Climate Change SPD.

8.25   The Council also recognises the important opportunities for reducing carbon emissions that are presented from hydrogen and electric energy sources and will support the use of these and other innovative fuel sources and developing them into energy centres for connection with wider decentralised energy networks where appropriate.

Adaptation

8.26   London's climate is expected to change with winters being warmer and wetter and summers hotter and drier. Waltham Forest needs to adapt to these predicted changes and its consequences such as increased extreme weather events, subsidence, increased risk of flooding, water scarcity and overheating of buildings in the summer months. Waltham Forest has undertaken a Local Climate Impacts Profile (LCLIP) to help the Council assess potential vulnerabilities to severe weather events and how these events are anticipated to affect local communities.

8.27   Waltham Forest is fortunate in that it has Epping Forest on its north-eastern and Lea Valley Regional Park on its western boundaries, which are major assets to the borough. Not only do these green spaces contribute to biodiversity and provide for easy access to open space and nature, but they are invaluable in responding to climate change by acting as carbon sinks and helping to reduce local warming in cities – an effect known as 'urban heat island'.

8.28   New developments will also be expected to contribute towards adaptation objectives and provide new open spaces and incorporate design elements such as sustainable urban drainage systems (SUDS), and vegetation. Vegetated surfaces provide local climatic benefits by providing shade, while helping to prevent erosion, ameliorate ambient noise and absorb some pollutants. Living roofs and/or walls will provide important opportunities for improving thermal efficiency and reducing the urban heat island effect, while benefiting biodiversity. Vegetation also helps to slow water runoff and therefore can contribute to reduced flooding.

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42   Waltham Forest Climate Change Evidence Base, 2009

Water Efficiency and Flood Risk

8.29   In relation to water use, due to the combination of decreased rainfall in the summer months, an increase in storm events and an increase in demand for water, it will be important to improve the borough's water efficiency and secure and protect its water resources and infrastructure. It will be important that buildings are designed or retrofitted to improve water efficiency, minimise water run-off and re-use rain and grey water where possible.

8.30   With predicted rises in fluvial flows, rising groundwater and increases to peak rainfall run-off and volumes, the risk of river and surface flooding will increase in the future, both in frequency and scale. The primary source of flood risk to Waltham Forest was found to be from fluvial flooding. Surface water and sewer flooding poses a moderate flood risk to the Borough and reservoirs may pose a risk to downstream properties, whereas groundwater flooding was assessed to be a low level risk. Flood risk in certain areas of the Borough is increased by the current lack of capacity within the existing drainage infrastructure. Development in Waltham Forest needs to adapt to this situation and take steps to defend existing properties and reduce the effects of flooding, while directing new development away from areas at risk from flooding.

8.31   The Flood Risk Zones in the map below, from the Strategic Flood Risk Assessment illustrates the distribution of land considered to be in the Environment Agency's medium and high probability Flood Zone 2 and 3. Challenges exist for the delivery of social and economic regeneration in Blackhorse Lane, and the Northern Olympic Fringe and Lea Bridge area. A detailed Level 2 Flood Risk Assessments has therefore been undertaken for these areas. Informed by these assessments, the Council seeks to respond appropriately to the risk of flooding in these areas, now and in the future, and considers the regeneration plans as a mechanism through which reduction in the level of flood risk can be achieved. This will require the use of sustainable drainage techniques to provide attenuation and reduce surface water runoff and potentially additional investment in flood defence infrastructure to prevent the standard of protection reducing further in the face of increasing urbanisation, climate change and an ageing defence network.

8.32   In accordance with PPS25 the Council will apply the Sequential Test and Exception Test to any Site Allocations or when dealing with applications in areas of flood risk. Where deemed necessary, development will also be expected to address flood resilient design and emergency planning due to PPS25. For instance, the Thames Catchment Management Plan states that where development is located in the Lee Valley flood resilient measures and flood storage opportunities should be incorporated where possible.

8.33   The Council will in principle support measures proposed by Thames Water, the Environment Agency, the Emergency Services and others to reduce flood risk, including increasing the quality of the floodplain, defend areas at risk and mitigate the effects of flooding through SUDS and other measures.

Figure 15 Flood Zones
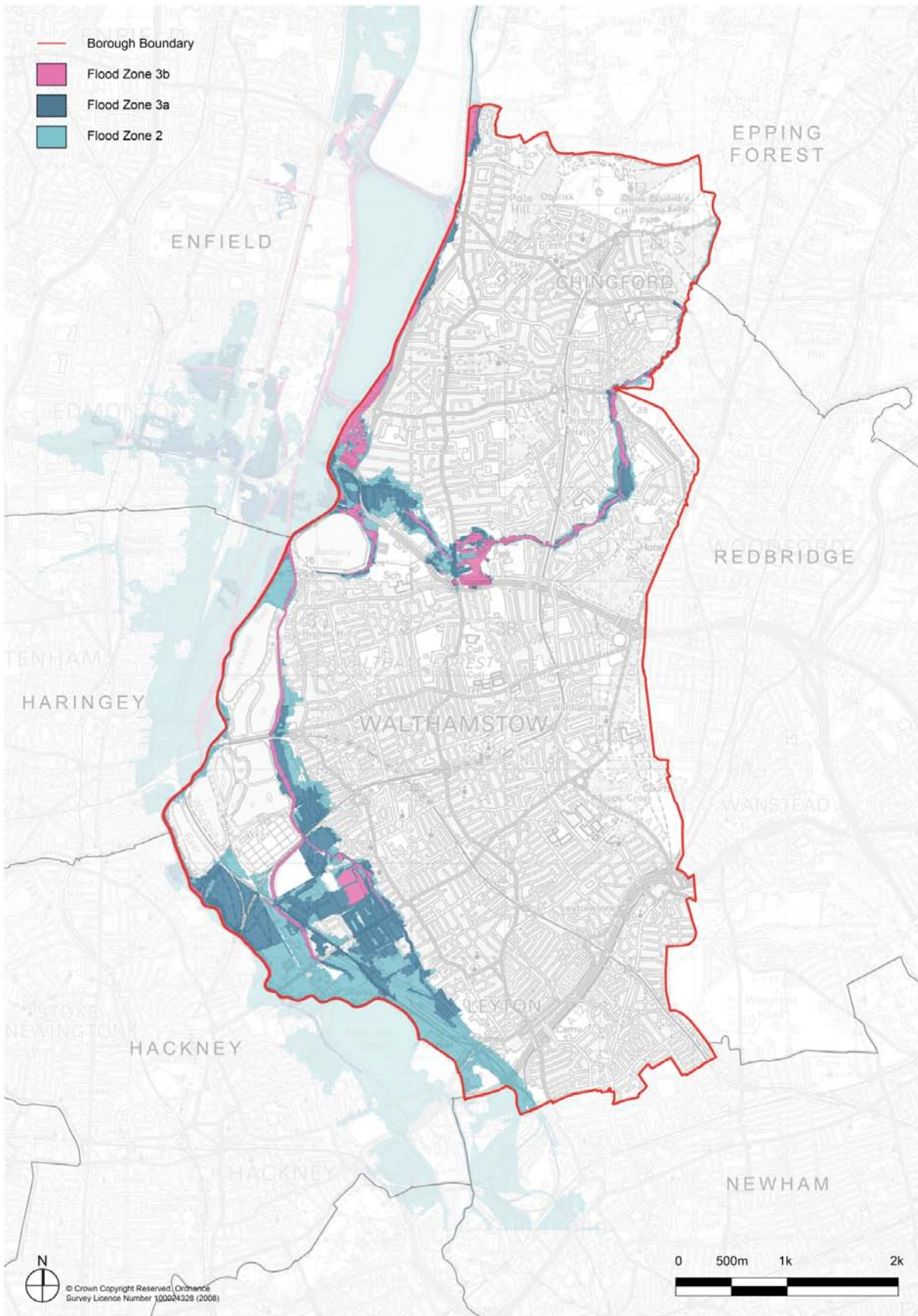
Implementation

8.34   The Council will provide further guidance and standards on responding to climate change effectively in the emerging Development Management Policies and the emerging Sustainability and Climate Change SPD. Requirements specific to the location and development types planned will further be investigate and set out in the Area Action Plans in particular with regards to decentralised energy network infrastructure.

8.35   The Council will work with its partners, developers, neighbouring Local Authorities, HCA, GLA and other Government Agencies and private industries to deliver decentralised energy networking infrastructure and CHP plants. Council will review the Climate Change Strategy every three years and may update carbon reduction targets as part of this process.

8.36   In areas of flood risk the Council will seek to ensure the tests in PPS25 are applied, flood resistant or resilient design is incorporated, drainage infrastructure and use of SUDS is increased, and flood defences and flood warning measures are increased.

8.37   The Council will actively pursue proactive measures to engage with the community on issues of climate change and how the community can contribute to achieving our targets and sustainable outcomes in the Borough. This will include coordinating and supplying information on Government funding available to residents for retrofitting of energy efficient measures.

9 Policy CS6 - Enhancing Green Infrastructure and Biodiversity

Strategic Objective 6

Protect, enhance and further develop a network of multifunctional green infrastructure capable of delivering a comprehensive range of benefits for both people and wildlife. Achieve a reduction in areas of deficiency in access to nature and seek to protect and enhance biodiversity across the Borough.

Introduction

9.1   Protecting and enhancing open spaces is critical in delivering sustainable communities. Open spaces are important to Waltham Forest in order to mitigate against the effects of climate change, boost the economy, showcase heritage assets and provide opportunities for physical activity and play. Open spaces are vital for supporting biodiversity and the Borough is fortunate to contain a number of sites recognised at the national and European levels for importance to nature conservation. As articulated in the Sustainable Communities Strategy, the Council aims to encourage healthy lifestyles which will be achieved through the provision of exciting opportunities for physical activity and play.

9.2   The impact of the Olympic and Paralympic Games in the Borough is one which holds great potential to ignite and perpetuate enthusiasm for sport and the Council will seek to capitalise upon this opportunity. It is anticipated that the Borough will experience significant growth over the plan period and therefore a key challenge is to capture the potential to enhance open spaces and biodiversity in order to support the regeneration of both the Borough and in East London as a whole.

Policy CS6 - Protection and Enhancement of the Natural Environment

The Council will endeavour to protect and enhance green infrastructure and biodiversity and to maximise access to open spaces across the Borough by:

A) protecting Green Belt and Metropolitan Open Land (MOL)and improving access where appropriate. Development and regeneration activity should be delivered principally through the use of brownfield land and buildings;

B) enhancing the green infrastructure network through the creation and enhancement of open spaces;

C) establishing and extending the Borough's Greenways, Green Corridors;and, providing landscaping along transport routes where possible;

D) improving the quality of, and access to, open spaces especially in areas of deficiency;

E) ensuring the adequate provision and efficient use of allotments and other spaces on which to grow food and plants;

F) protecting, promoting and enhancing the Lee Valley Regional Park;and

G) safeguarding and improving the quality, character, access and ecology of waterways in the Borough.

Protecting and Improving Biodiversity and Nature Conservation

H) seeking to protect and enhance biodiversity, especially where habitats, species and sites are recognised at the international, national, regional and local levels and as outlined in the Waltham Forest, London and UK Biodiversity Action Plans (BAPs).

I) creating and capturing opportunities for increasing the area and number of priority and locally important habitats.

J) promoting public access and improved contact with nature.

K) Local Nature Reserves should be maintained; and where it is appropriate, further reserves should be designated.

L) protecting existing healthy trees and encouraging the planting of new trees where appropriate.

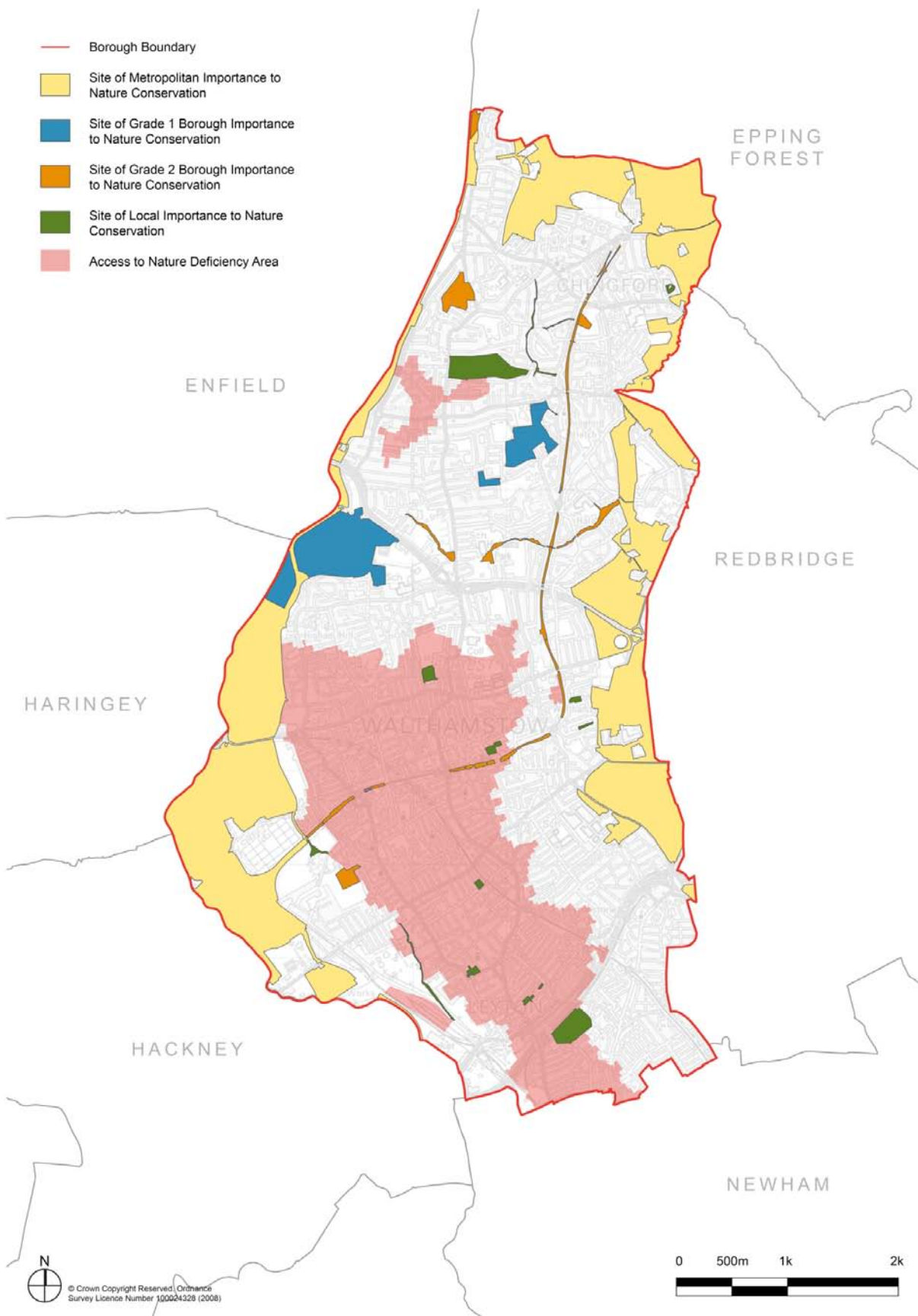**Encouraging Active Lifestyles and Providing Recreational Facilities:**

M) ensuring the adequate provision and quality of play and recreational spaces, outdoor sports facilities and parks. Where new open spaces are provided they will be designated as appropriate.

Protecting and Enhancing Open Spaces

9.3   Waltham Forest is host to 6 areas of Metropolitan Open Land, 3 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 [43] lies along the western edge of the Borough and the Epping Forest Special Area of Conservation (SAC) lies to the east.

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43   Following the Convention on Wetlands of International Importance held in Ramsar in 1971

Figure 16 Hierarchy of Sites and Deficiency in Access to Nature

Legend:
- Borough Boundary
- Site of Metropolitan Importance to Nature Conservation
- Site of Grade 1 Borough Importance to Nature Conservation
- Site of Grade 2 Borough Importance to Nature Conservation
- Site of Local Importance to Nature Conservation
- Access to Nature Deficiency Area

EPPING FOREST

ENFIELD

CHINGFORD

HARINGEY

WALTHAMSTOW

REDBRIDGE

HACKNEY

LEYTON

NEWHAM

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0   500m   1k   2k

9.4   Green Belt serves a structural function in preventing the unrestricted sprawl of urban areas. Metropolitan Open Land (MOL) is unique to London and is open land within the built-up area assigned the same protection against inappropriate development as Green Belt. Both designations are shown on the Proposals Map. Green Chains are principally ecological links which connect green spaces and are assigned MOL status due to their significance across London. The retention of the character and openess of these designations is a key driver of the policy and the Council will maintain the strategic extent of the Green Belt and MOL in accordance with national and regional policy. The policy follows from the aspirations of the Sustainable Communities Strategy which seeks to make the most of the regeneration opportunities emerging in East London. Therefore, the Council will concentrate on improving existing urban areas and delivering enhancements in existing areas of Green Belt and MOL.

9.5   The policy is in accordance with national policy, which states that the general extent and boundaries of existing approved Green Belt should be altered only exceptionally. It has been established that there is enough identifiable land within the Borough to meet the foreseeable needs for housing and employment uses [44]. Provision for added flexibility or for land in excess of the requirement in the London Plan is not considered to be exceptional grounds for amendments to the current boundaries.

9.6   The Open Spaces Strategy (2010) identifies the following open spaces in the Borough:

Table 7

PPG17 Typology	Sites	Total Hectares
Parks and Gardens	32	67.94 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[1]	795.12ha
Green Corridors	5	2.46 ha
Outdoor Sports Facilities	53	234.76ha
Amenity Green Spaces	19	6.07 ha
Provision for Children and Young People	22	2.87 ha
Allotments, Community Gardens & Urban Farms (Brookfield Allotments is shown as 2 sites where it crosses a ward boundary)	38[2]	50.85 ha
Cemeteries, disused Churchyards & other Burial Grounds	10	35.91 ha

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44   SHLAA, 2009 and Employment Land Study, 2009

Civic and Market Squares and other hard surfaced areas designed for pedestrians	1	0.46 ha
Total	**223**	**1211.15ha**

9.7   The term green infrastructure is used to describe the network of green spaces and other environmental features that are created and managed as a multi-functional resource. The Council aims to improve green infrastructure links in order to support community recreation and biodiversity simultaneously. Green Corridors are accessible routes for people and wildlife and should be created and extended where appropriate. Greenways are the network of mainly off-road routes which connect people and open spaces through links with other non-motorised users such as towpaths and the National Cycle Network. The Council advocates the delivery of the Greenways network as put forward by Sustrans to encourage more walking and cycling and the creation of green links. There are a number of priority routes which will be supported through the LDF. The routes comprise: Larkswood Park to Lower Hall Lane, Mansfield Park to Woodford Golf Course, Crooked Billet to Lea Valley, and the Valley Road shared use path. These Greenway routes should be strengthened further by improving the links to trip generators, particularly schools. The Council will also encourage landscaping and environmental improvements adjacent to roads, especially where they pass through areas of environmental significance, such as the Lee Valley Park.

9.8   Whilst the current provision of burial space is adequate, there is a strong need for new plots given that there is only one cemetery in the Borough that has capacity, and this is for the next 12 years only [45]. The Council will seek to improve and increase the provision of burial space and will work in partnership with other Council departments to do so.

9.9   As a result of development at the strategic level, such as the imminent Olympic Games, there may be opportunities to establish new areas of open space which may include Green Belt or MOL. The Council will support such aims and will award new designations of open space suitable protection.

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45   Strategic Infrastructure Plan, 2009

Distribution of Deficiency in Open Space

9.10   Although 31% of the land area in Waltham Forest consists of open space, spatial deficiencies exist [46]. The London Plan identifies a hierarchy of publicly accessible open spaces and recognises that people are prepared to travel further for larger areas of open space.

The London Plan Open Space Hierarchy

Open space categorisation	Size guidelines Hectares (ha)	Distances from homes to open spaces	Distances refined to take into account barriers to access
Regional Parks	Over 400 ha	8km	-
Metropolitan Parks	60 – 400 ha	3.2km	-
District Parks	20 – 60 ha	1.2km	-
Local Parks	2 – 20 ha	400m	280m
Small Local Parks	0.4 – 2 ha	400m	280m
Pocket Parks	Less than 0.4 ha	400m	280m
Linear Open Spaces	Variable	Where feasible	-

46   Draft Open Spaces Strategy, 2010

9.11   In terms of accessibility to open spaces, all residents in the Borough are within 1.2km of either Epping Forest or the Lee Valley Regional Park. These significant areas also undertake District and Metropolitan Park functions and therefore the whole of the Borough meets the standards for access to Regional, Metropolitan and District Parks. There are 2 large areas of deficiency in access to smaller areas of open space in the Borough and they comprise the Blackhorse Lane and the Palmerston Road area along with the area proximate to Essex Road, Wallwood Road and Murchison Road [47].

9.12   The Open Spaces Strategy maps all open spaces greater than 0.4 ha and depicts a general deficiency of public open space in the dense areas in the south and centre of the Borough. The south of the Borough has more limited access to green spaces and is notably more urbanised [48]. At ward level, deficiencies become more pronounced and certain higher density areas (including Cann Hall, Cathall, Grove Green, Leyton , Leytonstone, Hoe Street and William Morris) present deficiency in the amount of publicly accessible space. It is also vital to note that in certain less dense areas (including Chapel End, Valley and Endlebury) deficiencies in access to publicly accessible spaces are still present[49].
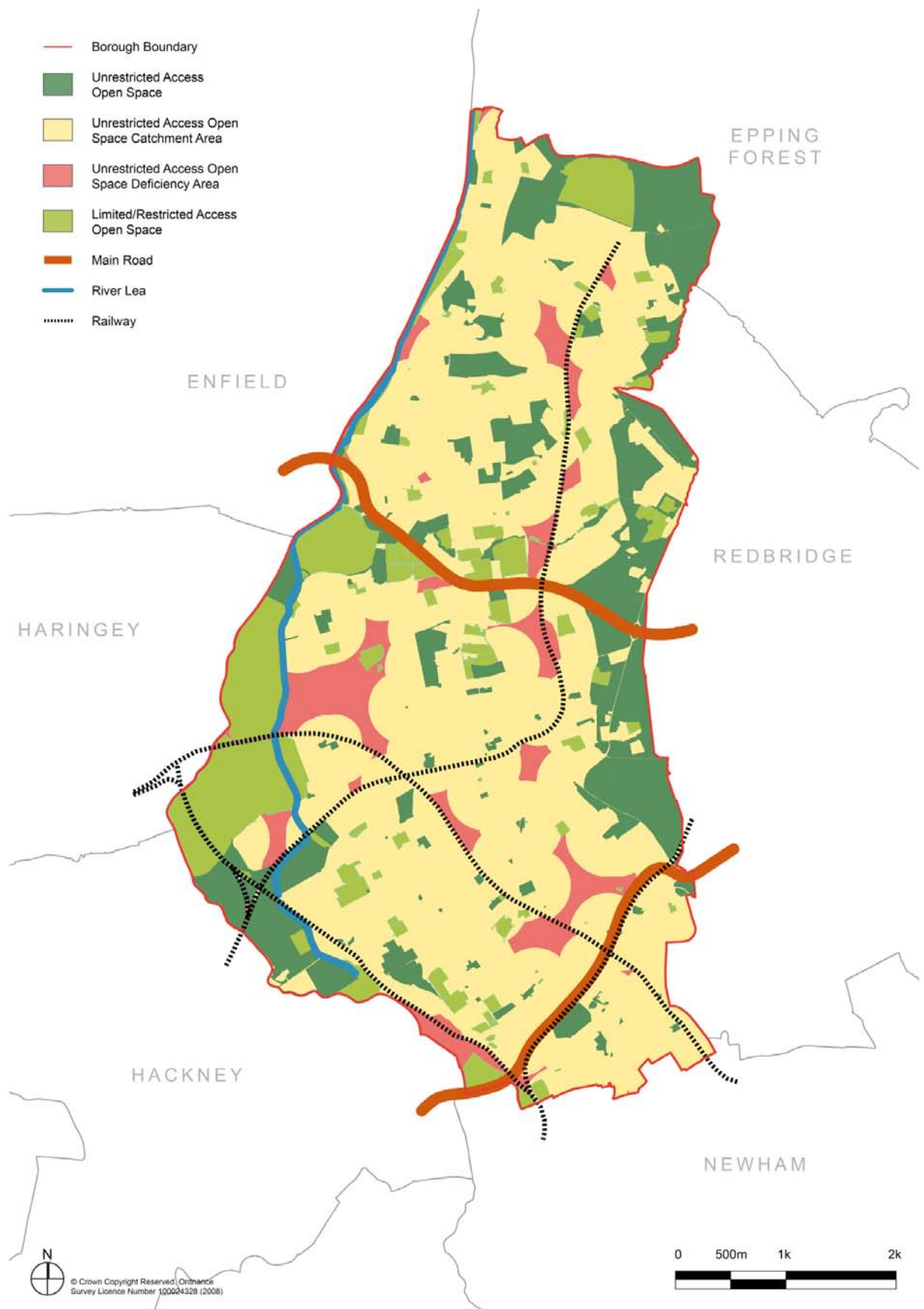

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47   Draft Open Spaces Strategy, 2010
48   London Plan Implementation Report: Improving Londoners' Access to Nature, 2008
49   Draft Open Spaces Strategy,2010

Figure 17 Access to Open Space

9.13 The need for new spaces may also arise as a result of new housing and this should be taken into account when planning new developments. The Open Spaces Strategy sets the standard for open space provision at 1.6 ha/1000 people [50]. This should be achieved where possible through the creation of new areas of open space or by providing public access to open space that does not have access at present. Delivery of each area of enhanced open space will need to be phased in parallel to occupation of the developments it is intended to serve. In order to lessen the pressure on Epping Forest and the Lee Valley SPA and Ramsar sites it is recommended that alternative open spaces are provided for recreational users, such as walkers and cyclists [51]. In certain instances, the Council may consider the temporary use of vacant sites for open space uses to alleviate deficiencies. The quality of open spaces is also linked with the frequency of use by residents and areas for improvement are identified in the Open Spaces Strategy. Planning obligations and/or adopted tariff contributions will be sought in line with DM13 Open Space, Sport and Recreation in order to improve the quality of and access to open spaces.

Allotments

9.14 The Borough has 37 open spaces which are utilised as allotments. Allotments, community gardens and urban farms are a useful resource for delivering a range of benefits including providing a healthy and sustainable food resource and fostering opportunities for gentle exercise. Based on calculations of projected demand for allotment space arising from population growth, the Council will aim to use existing allotments in an efficient manner, encourage the uptake of community gardens and the use of living roofs and walls to grow food and plants. In exceptional circumstances, the Council may need to consider the relocation of allotments. In such exceptional circumstances, there would be no net loss of allotments, the re-provided allotment space would be of a higher quality, and would meet the wider needs of the community.

Epping Forest and the Lee Valley Regional Park

9.15 The Borough is bounded to the northeast by Epping Forest and to the west by the Lee Valley Regional Park. Epping Forest is dominated by ancient woodlands, grass heaths and grasslands. Improvements to facilities in Epping Forest should be carefully designed and located in order to preserve the character and biodiversity value. The Lee Valley Regional Park is a distinctive statutory asset within Waltham Forest and involves a vast area of open land with reservoirs, meadows and marshes. The Lee Valley Regional Park should be protected, promoted and enhanced in line with its statutory purpose [52]. The Lea Valley offers opportunities for learning and volunteering due to the rich heritage of the area as well as being a valuable resource for leisure, recreation, sport and nature conservation. The Regional Park has the potential to alleviate inequalities and provide opportunities for the community to access nature and the waterside environment. Consequently, the Council supports the facilities that the Regional Park currently provides as well as the future Olympic legacy facilities at Eton Manor, the Velopark and the proposed new green link between Leyton Mill and Eton Manor. The Council will support and work in unison the Lee Valley Regional Park in order to deliver the Park Development Framework.

Waterspaces

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50   Draft Open Spaces Strategy, 2010
51   Core Strategy Sustainability Appraisal, 2010
52   Park Act, 1996

9.16   The Thames and its tributaries form the Blue Ribbon Network that provides Green Corridors for wildlife and recreation. The London Rivers Action Plan (LRAP) aims to promote river restoration across London through the enhancement of riverside parks and green spaces. The Council will support the aims of the Action Plan for providing public green areas where the local community can reflect and unwind, as well as green routes for both wildlife and people.

9.17   There are several free flowing watercourses (e.g. Rivers Lea and Ching) along with areas of standing water in the Borough (e.g. The Essex Filter Beds and Walthamstow Reservoirs). The Council recognises that the effective management of our water resources plays a crucial role in supporting habitats and species in line with the Water Framework Directive. However, the condition of 75% of the Walthamstow Marshes within the Lee Valley Regional Park were classified as 'unfavourable declining' [53]. Development proposals should demonstrate sensitivity to the water environment and measures to enhance biodiversity and water quality should be delivered through development proposals and restoration schemes. In certain cases, the uses adjacent to waterways may be altered in order to boost the vibrancy of the waterways. This may include the promotion of waterside living and access for all which will, in turn, increase the safety and quality of the waterside environment.

9.18   The Lea Valley Reservoirs in particular form a network of open spaces that have the potential to link to the wider green infrastructure network and to local communities. Improvements to the water quality and habitats of the reservoirs is a key challenge, and the Council will aim to effectively manage, protect and support catalyst projects in the Borough, such as the Lee Valley Pathway project, the Walthamstow Wetlands project, proposals for the Green grid and the revitalisation of Dagenham Brook. The Upper Lee Valley Landscape Strategy makes specific reference to the Walthamstow Wetlands project. The Strategy identifies the potential in terms of distinctiveness, diversity of open spaces and likelihood of attracting public interest from across the region. Improving access to open spaces and watercourses within the Borough should be encouraged but requires well designed access arrangements and suitable management.

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53   Waltham Forest Annual Monitoring Report, 2008/2009

**Protecting and Improving Biodiversity and Nature Conservation**

9.19   Biodiversity is the variety of all living things (wildlife) and the places where they live (habitats). The Council regards the protection and enhancement of biodiversity as integral to ensuring that future generations will have the same opportunities to enjoy the natural environment as we do today, as reinforced in the Waltham Forest Biodiversity Action Plan (BAP). Establishing well-connected green infrastructure is essential in order to lessen the impact of climate change on the natural environment, particularly in terms of species and habitat loss or change.

9.20   As well as sites recognised at the international and national levels, the Borough also contains many sites of Metropolitan, Borough or Local Importance. It has been noted that all areas of Site of Special Scientific Interest (SSSI) habitat underpinning the Epping Forest SAC and the Lee Valley SPA and Ramsar sites[54] in Waltham Forest are not currently in favourable condition. Consequently, the Council will promote cross-authority collaboration and S106 funding for habitat management [55].

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54   Following the Convention on Wetlands of International Importance held in Ramsar in 1971
55   Core Strategy Sustainability Appraisal 2010,

Figure 18 Sites of Importance for Biodiversity
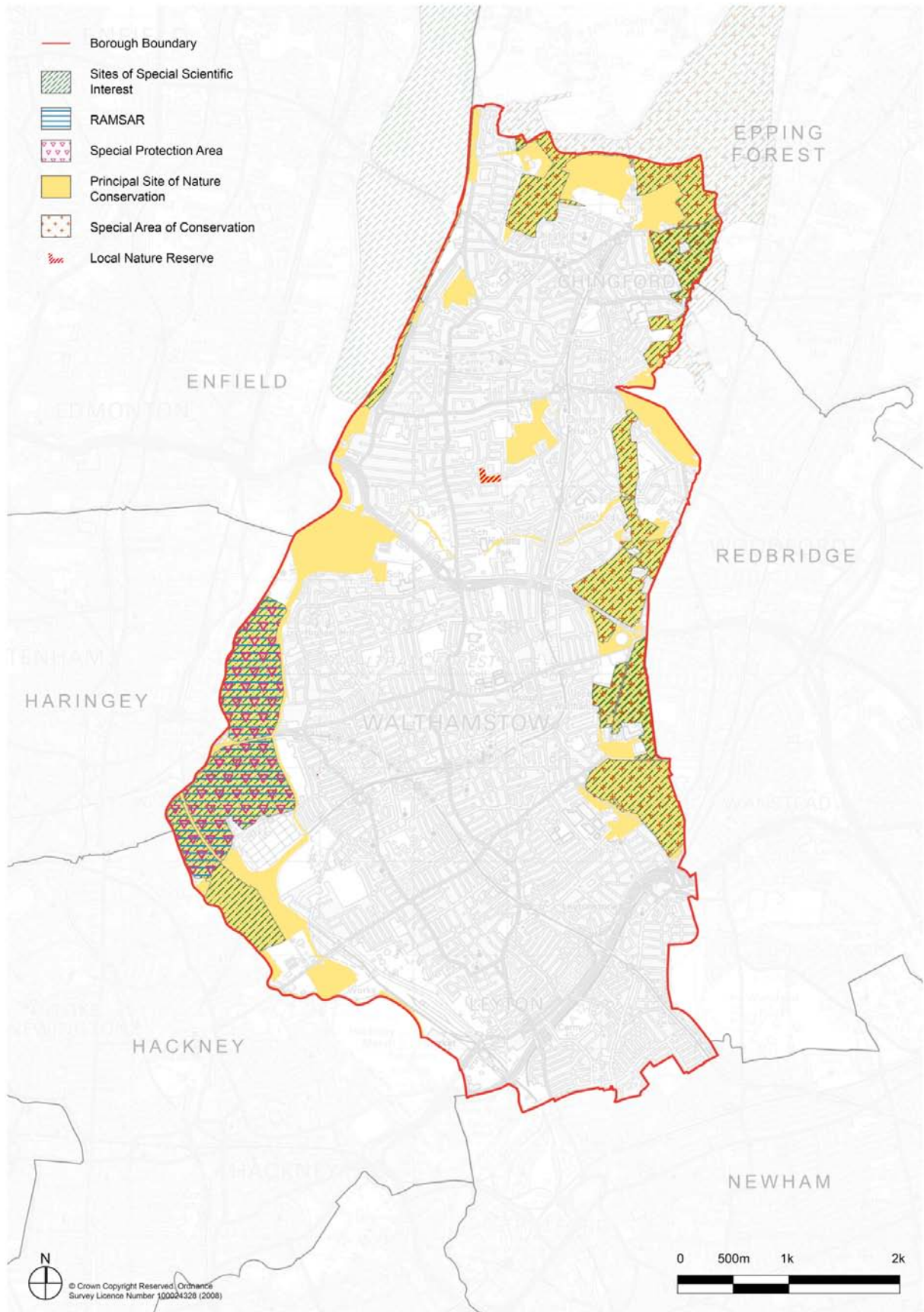
9.21   Development should seek to protect and enhance the natural environment in order to improve opportunities for people to experience nature. This could involve the protection of key sites and species, the provision of new habitat in proposed developments, enhancing Green Corridors or integrating landscaping/ environmental improvements in design solutions. It is also important to recognise the biodiversity value of brownfield sites and land adjacent to railways. Where a proposal is likely to impact on biodiversity, it is recommended that direct and indirect impacts are assessed and opportunities for enhancement considered.

9.22   The Council has taken into account the Mayor's Biodiversity Strategy and will seek to establish new wildlife habitats as well as delivering improvements in existing open spaces. In addition, the Olympic Delivery Authority (ODA) has prepared an Olympic Park BAP which outlines the approach to be taken at the Eton Manor site. The Open Spaces Strategy identifies sites where improvements to biodiversity will, in addition improve access to nature for the residents of Waltham Forest.

9.23   There is one Local Nature Reserve (LNR) in the Borough at Ainslie Wood. The Council has a legal interest in the LNR and acknowledges its importance for biodiversity. Where suitable, the Council will aim to allocate further reserves to provide people with contact to high quality open spaces.

9.24   The Borough has areas of both ancient and secondary woodland. The Tree Strategy works towards ensuring that trees become a defining feature of the Borough through increasing tree cover, improving the protection of trees and establishing east-west green corridors. The document identifies areas of open space, educational sites, housing land and areas of social and economic deprivation as priorities for tree planting. Other more specific priorities for new planting include the Olympic Approach Routes and schemes associated with the High Street Life project. Tree planting will be encouraged where appropriate, on both Council and non-Council owned land.

Encouraging Active Lifestyles and Providing Recreational Facilities

9.25   Access to open spaces bring benefits to people's mental and physical wellbeing by providing space for relaxation and physical activity. Open spaces provide areas for educational uses where young people and adults can learn about the natural environment. It is important to recognise the heritage value of open spaces, either as an integral element of designated assets, such as the setting of a listed building, or as non-designated assets. The economic benefits of our natural environment are frequently overlooked and yet improvements to our green spaces offer a multitude of economic gains. The expansion of green infrastructure has positive impacts on the overall quality of the public realm and proximity to high quality open space and parks has been linked with higher property prices. High quality open spaces and parks can be inductive to tourism activity which brings economic gains; but this requires effective management in order to avoid the disconnection of habitats.

9.26   The quality and quantity of available open space is directly associated with the lifestyles that residents lead and the quality of their health as a consequence. Residents in the Borough have a higher rate of diabetes, lower life expectancy and higher incidence

of early deaths caused by heart disease and stroke than the England average. This is linked to the low take up of physical activity, with only 6.1% of adults undertaking sports or physical activity 5 days a week when compared to the England average of 10% [56].

9.27 The Council considers the provision of high quality, safe and accessible open spaces within the Borough as essential to ensuring opportunities for physical activity in order to promote healthy living and preventing illness. Areas of quantity, quality or access deficiency should be reduced and where possible eliminated and new public spaces provided. The Council will also support and cultivate the provision of innovative opportunities for sport and recreation for all sections and age groups of the community.

9.28 There are 51 children's play areas and 14 MUGAs (multi-use games areas e.g. Basketball, tennis) in Waltham Forest. Areas deficient in play space are larger and occur throughout the Borough [57]. Due to this, there is a need to both improve existing play facilities and seek new provision where there is the opportunity to do so, particularly in new housing development.

9.29 6 parks in the Borough are currently managed as Premier Parks and the Council aims to achieve Green Flag Awards for all. The Council will support the aims of the Open Space Strategy to eradicate barriers to using parks, for instance, for people with disabilities and to provide new smaller parks in areas recognised as deficient. The Council will also seek to protect and enhance the Parks and Gardens of Local Historic Interest as well as those included on the Local List.

9.30 Outdoor sports facilities include playing pitches and athletics tracks. The Strategic Infrastructure Plan concludes that there are no strategic infrastructure requirements for outdoor sports facilities arising over the Core Strategy period 2006-2026. The Council is currently updating the Playing Pitch Strategy which was undertaken in 2004. One of the components of the update will involve the analysis of the effect of the Olympic legacy facilities on demand for playing pitches. Once complete, the revised Playing Pitch Strategy will provide valuable information on the use of pitches across the Borough and will guide the implementation of this policy along with the Development Management policies.

9.31 The spatial relationship of the Borough to the Olympic Park within the Lea Valley creates a unique opportunity to deliver positive environmental impacts and enhanced opportunities for organised sport. The 2012 Games may drive the need for new open space protection measures, where areas of new or enhanced parkland may be delivered. The Council also acknowledges that within the Lea Bridge Road area of the North Olympic Fringe there is potential to build upon the existing leisure offer in this location. The North Olympic Fringe Area Action Plan will deal with this in greater detail.

Implementation

9.32 Sites of international and national importance already benefit from legal protection. The Council aims to implement the policy of enhancing and expanding the Borough's open spaces in a progressive, staged manner. The Council's adopted Sustainable Community

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56   Waltham Forest PCT Annual Report, 2009/2010
57   Draft Open Spaces Strategy, 2010

Strategy and Climate Change Strategy both recommend the enhancement of the Borough's green infrastructure and along with the Core Strategy will provide the policy mechanism for this to be implemented.

9.33 The Council will collaborate with a range of public, private and community partners in order to deliver improvements to green infrastructure and biodiversity in the Borough. This includes working with partners to achieve the outcomes and targets set out in the Waltham Forest, London and UK BAPs. The Open Spaces Strategy shows the quality and quantity of different types of open space provision and its Action Plan will be supported through the LDF. The recent publication of the Tree Strategy emphasises the importance of increasing tree coverage in the Borough and this will be encouraged through development proposals where appropriate.

9.34 The Council is committed to working with relevant community organisations and agencies to secure safe and exciting opportunities for formal and informal recreation. The Council will work with the Epping Forest Conservators and other stakeholders to provide enhanced access management, sustainable transport and mitigation against negative impacts as endorsed in documents such as the Epping Forest Transport Strategy. The Council will also work in unison with the Lee Valley Regional Park in delivering the proposals set out in the Park Development Framework. Specifically, the Walthamstow Wetlands project and projects around the Lea Bridge and Blackhorse Lane areas will require collaboration between the Council and other partners.

9.35 The Development Management policies will outline the development requirements and expected financial contributions. Financial contributions will be sought for the provision of new or enhancements to existing areas of nature conservation and open spaces, including play and recreation space. New open spaces will be designated, where suitable, in the Site Specific Allocations and Area Action Plans.

10 Policy CS7 - Promoting Sustainable Waste Management and Recycling

Strategic Objective 7

Ensure that waste is managed in the most environmentally friendly way in order to protect human health and the environment by producing less waste, re-using waste and recycling it and thereby contribute to an efficient use of resources.

Introduction

10.1   The amount of waste produced in Waltham Forest has been increasing over the past decades. With our population growing, the increasing generation of waste is creating an unsustainable demand for landfill space. It is essential the Council manages waste in a sustainable way which will achieve efficient use of material resources and reduce the amount of waste produced. This can bring significant benefits in terms of resource efficiency and environmental performance, including the reduction of carbon dioxide emissions.

10.2   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.

10.3   Waltham Forest is prepared to take more responsibility for dealing with the boroughs waste (self-sufficiency) and ensuring that waste is disposed in one of the nearest appropriate locations (proximity). The Council is a member of the North London Waste Authority and is working closely with its partners across north London to prepare a joint North London Waste Plan DPD in order to secure sustainable management of the borough's waste in the future.

Policy CS7 - Sustainable Waste Management

The Council will work in partnership with the North London Waste Authority (NLWA) partner boroughs in order to manage its waste in a sustainable manner by:

A)   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;

B) ensuring that new development including change of use provides accessible, adequate and well designed internal and external storage facilities for residual waste and recycling;

C) ensuring that waste is minimised during consmtruction of new developments, encourage the use of sustainably sourced materials and requiring developments to make on-site provision for the recycling and re-use of construction and demolition waste;

D) ensuring there is sufficient land for waste management purposes and establishing appropriate policies for waste applications to maximise self-sufficiency in waste management, through the Joint North London Waste Plan and applying its policies to waste development. Additionally the Council will safeguard existing waste management sites within Waltham Forest; and

E) encouraging waste to be treated as close to the source as possible and encouraging sustainable movement of waste, maximising the potential use of rail and water transport where waste is not treated at its source.

10.4 Waste is a particular problem in urban areas due to the higher density of population producing waste and the limited amount of land to manage it. Traditional ways of dealing with waste, such as landfill sites outside of London, are becoming increasingly unacceptable due to the negative environmental impacts.

10.5 The Council considers waste as a potential resource and will seek to manage waste as far up the waste hierarchy as possible to ensure that environmental and economic benefits are maximised. [58] The Council supports the Mayor's policies for communities to take more responsibility for their own waste and thereby contributing to achieving London's waste self-sufficiency.

10.6 The draft London Plan (2009) sets out waste apportionments for London Boroughs with Waltham Forest being responsible for managing 176,000 tonnes of waste in 2011, 226,000 tonnes of waste in 2021, and 283,000 tonnes in 2031. The Council is pooling its waste apportionments and has been working jointly with its partner boroughs in north London of Barnet, Camden, Enfield, Hackney, Haringey, and Islington, to prepare a joint development plan – the North London Waste Plan (NLWP) - that will sit alongside the North London Joint Waste Strategy and will identify how waste will be sustainably managed in North London through to 2027. North London is expected to deal with 1,320,900 tonnes of waste in 2011, rising to 1,949,229 tonnes in 2027 [59].

10.7 The Plan addresses the management of waste collected by or on behalf of local authorities (municipal solid waste); commercial and industrial waste; construction, demolition and excavation waste; hazardous waste and agricultural waste. It identifies a range of suitable sites to meet the north London borough's future waste management needs and thereby support increased self-sufficiency for London and better use of resources and it sets out a range of policies designed to support determination of planning applications for waste facilities as well as ensure a more general and sustainable approach to waste and resource management.

10.8 The NLWP sets out a hierarchical approach to location of waste facilities that will be set out in the NLWP, which seeks to prioritise redevelopment (and intensification) of existing facilities, followed by reorientation of transfer sites to waste management. New sites may only be considered if the former two options cannot deliver suitable sites. The NLWP identifies potential sites, which are most suitable for new waste treatment plants,

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58   The Waste Strategy for England, 2007 introduced the waste hierarchy, which is endorsed through the London Plan
59   emerging North London Waste Plan, Submission Draft (2010)

and set out planning policies to guide all future waste developments. Planning applications for new waste facilities will be assessed against the North London Waste Plan and other national, regional and local planning policies.

10.9 Waltham Forest currently has 5 existing waste management and 3 waste transfer sites. While the NLWP does not identify new waste sites within Waltham Forest, the Council will safeguard the existing waste management or waste transfer facilities in the borough for waste use, as this will reduce the need for additional sites. Where appropriate, the intensification of existing facilities and reorientation of transfer sites will be promoted. If existing sites are to be developed for alternative use, developers will be required to make compensatory provision within the NLWP area, ensuring that there will be no net loss in the amount of North London waste capacity.

10.10 Where waste facilities are redeveloped or intensified in Waltham Forest, the Council expects these facilities to be of a high standard, well designed, and compatible with local amenity, fit for purpose and to create opportunities for new jobs, new types of green industries and for local heat and energy systems that can help in the fight against climate change through the use of waste to energy for waste that cannot be suitably reused or recycled. Where appropriate, the Council will in accordance with the emerging NLWP encourage waste management technologies to be co-located with other industrial processes where heat and power generated by one process can be used to drive another process.

10.11 The Council is committed to reducing the amount of waste generated in the Borough, encouraging prevention, reuse and recycling, and management of collected waste in a sustainable way. The Council has a number of schemes that encourage waste minimisation and recycling such as recycling and organic waste kerbside collections, whilst promoting home composting, Household Recycling Centres including a reuse centre, Bring Sites, recycling services and promotional work with schools, a dedicated Waste and Recycling Education Centre for schools and the community and ongoing community engagement, along with the promotion of waste minimisation. The Council also carries out consultations with residents to continuously improve the services provided and is working towards the introduction of on street recycling and the reuse and recycling of bulky waste. The Council will work with the communities to achieve the national and London Plan recycling targets of 45% by 2015 and 50% by 2020 [60].

10.12 In order to increase recycling rates, all new developments are required to ensure that waste can properly be separated and stored, making household recycling as convenient as possible. Therefore, new developments are required to provide adequate, well-designed, and well-integrated internal and external waste storage and recycling facilities. Facilities for home composting will be encouraged in appropriate development schemes, since composting at home is one of the easiest and most environmentally friendly ways of recycling organic waste.

10.13 The Council will also seek to encourage sustainable construction waste management through good design, use of sustainable materials including those which have a low environmental impact and high recycled content, re-use of construction materials on-site and where possible treatment of waste on-site to reduce the need to transport materials.

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60   Draft London Plan (2009)

10.14   In April 2008 the Government made the preparation of Site Waste Management Plans mandatory for all developments worth £300,000 and more [61]. These plans are to describe and quantify each waste type expected to be produced in the course of a project and identify the waste management action proposed for each type, including re-using, recycling, recovery and disposal. To ensure an integrated approach to waste management and ensure the highest possible re-use and recycling rates the Council will require, through a planning condition, the submission of a site waste management plan prior to construction.

10.15   Dealing with waste within or in close proximity to the Borough contributes to sustainability objectives in that it minimises the need for waste to be transported and associated impacts of congestion, pollution and noise. The Council encourages waste management in proximity to its source and to be transport waste by rail or water where possible.

Implementation

10.16   This policy will be implemented through the planning system, the Council's development management service and the provisions of the North London Waste Plan. Whilst the Core Strategy sets out a broad spatial approach to waste management provision, more detailed policies will be included in the North London Waste Plan.

10.17   Existing waste sites will be safeguarded for waste use through the North London Waste Plan. A change to the use of these sites will only be permitted if a suitable compensatory waste site is provided that replaces the lost land, facilities and/or services.

10.18   The Council will continue to actively pursue strategies and community education programmes to encourage waste prevention and reduction and increase reuse and recycling in the Borough, in order to meet the national target of 45% recycled waste by 2015 and 50% by 2020 [62].

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61   Waste Management Plans Regulations 2008
62   Waste Strategy for England, 2007

11 Policy CS8 - Developing Sustainable Transport

Strategic Objective 8

Ensure Waltham Forest is a safe, vibrant and healthy place to live and work by enhancing connectivity across the borough, facilitating regeneration and growth in a sustainable manner, minimising congestion and pollution, and providing a range of attractive travel options to access jobs, opportunities and facilities within the borough and beyond.

Introduction

11.1   Waltham Forest's transport network reflects the borough's geography of being bordered on its western side by the River Lee Valley with a string of reservoirs and waterways and on its eastern sides by Epping Forest. As a consequence, both the main highway and rail links are predominantly from north-east to south-west to access central London.

11.2   The borough is reasonably well served by public transport with the Chingford to Liverpool Street Line as a radial line, forming a main commuter route to central London and the Barking to Gospel Oak line as an outer London orbital route. The borough also has two tube services, the Central and Victoria lines, which form the main commuter routes to the City and West End. In addition, to the south of the borough, Stratford is a major transport hub offering access to the underground, DLR and rail network.

11.3   Providing good access to jobs opportunities in Stratford, the Upper Lea Valley Opportunity area, and Canary Wharf is key to the borough's prosperity and regeneration aspirations. Both orbital and north-south public transport connections need to be improved and the overall public transport accessibility within the borough need to be enhanced.

11.4   Waltham Forest has also good access to the strategic highway network, with a number of access points to the A12 and the A406 Northern Circular. Whilst providing strategic access, these infrastructure routes bring several challenges to Waltham Forest, such as dividing local neighbourhoods, acting as a barrier for cycle and pedestrian movement and resulting in environmental impacts associated with high volumes of traffic, including air pollution and noise.

11.5   In recent decades, increases in local car ownership and car use, in addition to increases in through traffic from outside the borough, have put severe pressure on the local transport system in Waltham Forest. Traffic congestion has increased and contributes greatly to the borough's carbon emissions, resulting in adverse impacts on air quality and quality of life for residents and undermining the economic viability of the borough.

11.6   Addressing these issues is particularly challenging in light of the anticipated growth in Waltham Forest and the sub-region, which is expected to exacerbate this situation. A substantial modal shift away from the private car to more sustainable means is therefore essential to address issues of serious traffic congestion, poor air quality and to ensure equitable access to employment and services for Waltham Forest residents.

Policy CS8 - Developing a Sustainable Transport Network

The Council will facilitate growth and regeneration in a sustainable manner and promote sustainable travel by:

Coordination of Land Use and Transport

A) working with TfL, Network Rail and other partners to facilitate the delivery of key transport infrastructure improvements in the borough to support regeneration and growth, in particular the reinstatement of the Chingford – Stratford line;

B) safeguarding land as shown on the proposals map for Crossrail 2 Line;

C) guiding developments to be located and designed to reduce the need to travel and to encourage walking, cycling and access to public transport;

D) requiring Transport Assessments and Travel Plans where appropriate in support of planning applications to determine potential transport impacts and to demonstrate how the development minimises and mitigates against the expected impacts;

Sustainable Transport Network

E) actively encouraging walking and cycling by providing an attractive public realm and safe, convenient and accessible routes and facilities throughout the borough;

F) working with partners to improve the accessibility, reliability and quality of the public transport system and its integration with other transport modes;

Managing Private Motorised Transport

G) fostering road safety and minimising the negative impacts of traffic such as congestion, pollution, and noise by managing traffic flow and speed effectively in accordance with the road hierarchy and implementing public realm and streetscape improvements, including the reallocation of road space where appropriate;

H) managing the demand for private car travel by protecting the continued provision of existing and promoting the expansion of cab services, car clubs, pool cars, and low emission motor vehicles, and working with the Mayor of London's to implement the electric car strategy;

I) managing parking requirements effectively across the borough by providing appropriate car, motorcycle and cycle parking facilities in accordance with standards set out in the Development Management policies, managing on street parking, and promoting car free and car-capped developments; and

Freight

J) promoting the sustainable movement of freight and minimising the impact of freight movement on local amenity, traffic and the environment.

11.7   The Council considers that the most sustainable way to plan for the borough's future transport needs is to; reduce the need to travel by locating new development appropriately, promote walking and cycling for shorter journeys and implement new and improved public transport provision for longer orbital and radial travel.

11.8   This approach is considered to be consistent with the recently adopted Mayor's Transport Strategy and emerging London Plan and will facilitate the development of safe and efficient movement of goods and people and provide equitable access to the jobs and opportunities associated with the regeneration of the borough and wider East London region.

Coordination of Land Use and Transport

Accommodating Growth and Regeneration

11.9   Anticipated growth and regeneration in Waltham Forest over the plan period is expected to put additional pressure on the borough's transport networks, many parts of which are already at or close to capacity. Given the problems associated with the increase in car ownership and congestion in the borough in recent years, it is imperative to accommodate growth in travel demand in the most sustainable manner. Strategic transport infrastructure improvements are therefore crucial in supporting future growth and regeneration in the borough and the Council will work closely with TfL and other partners to ensure adequate capacity of the transport system.

11.10   Recent analysis undertaken by TfL as part of its preparation in producing long-term north and east London sub-regional plans has identified a number of key 'potential connectivity opportunities' concerning planned growth in Waltham Forest and wider north and east London sub-regions. These indicative areas are as follows;

- Chingford to Stratford
- Walthamstow to Stratford
- Stratford to Blackhorse Lane/Tottenham Hale (via Leyton)
- Chingford to Edmonton Green
- Chingford to Essex

11.11   This work broadly corresponds to the Council's own analysis of key infrastructure requirements and building on these areas would allow the borough to maximise its potential at the confluence of the Thames Gateway and London-Stansted-Cambridge-Peterborough regeneration corridors. The re-introduction of the Hall Farm Curve, a short stretch of tracks linking the Chingford to Liverpool Street route to the Coppermill Junction to Stratford Line, and re-opening of Lea Bridge Station are key transport infrastructure schemes, which will stimulate and facilitate growth in the borough and the sub-region.

11.12   The ability of Waltham Forest's residents to access employment, leisure and open space opportunities associated with the development of the Olympic Park and the on-going regeneration of Stratford is of crucial importance. Connecting Chingford to the Stratford growth and employment area would not only provide opportunities to carry on the Olympic Legacy but also provide additional journey possibilities to destinations such as Canary

Figure 19 Transport Connections
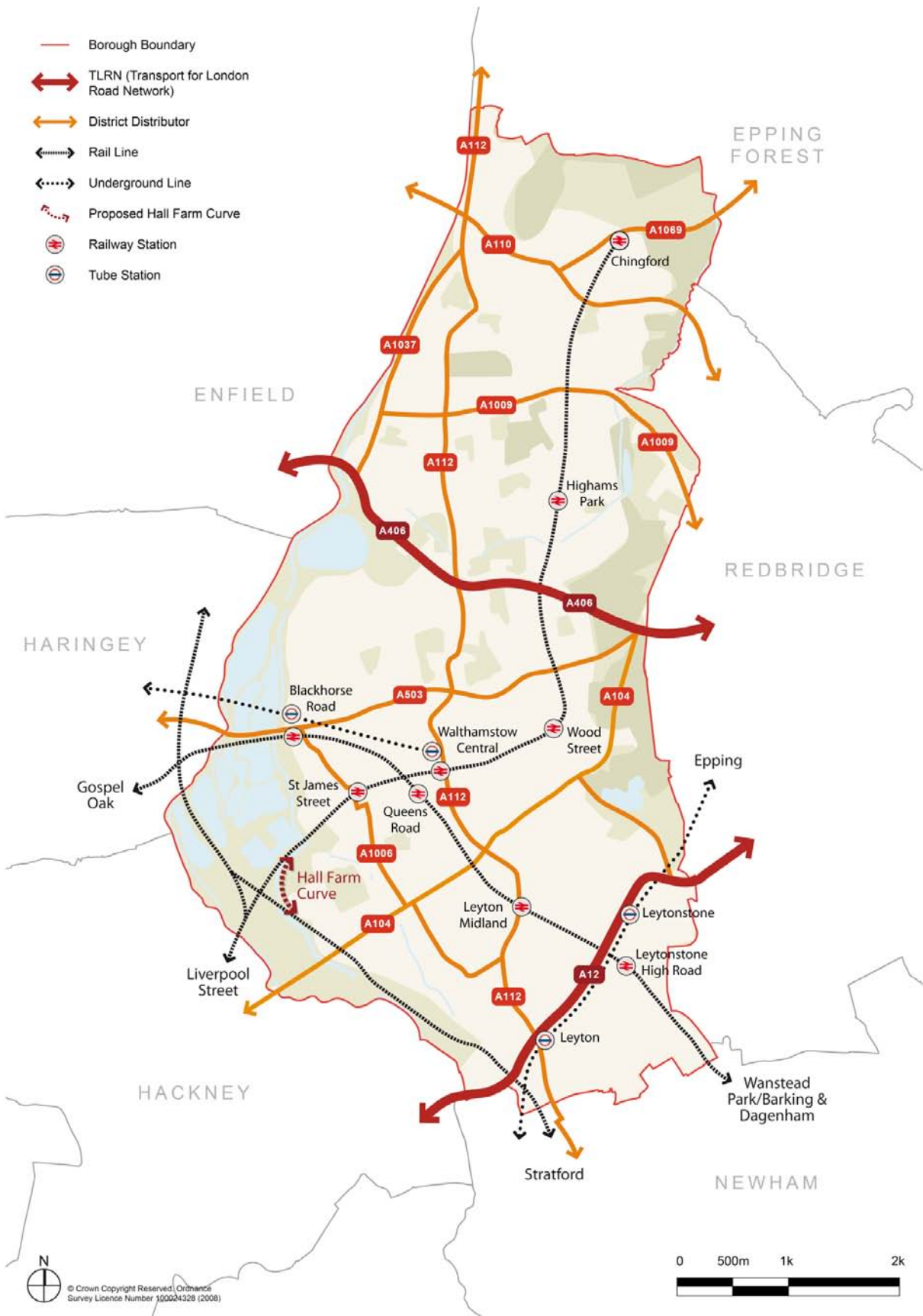
Wharf on the DLR and a strategic link to the orbital Overground network via the north London line. Equally, the reinstated Chingford – Stratford line would make it easier for people to access the Lea Valley Regional Park and Epping Forest.

11.13   Convenient public transport access to Stratford's job opportunities and transport connections is vital to Waltham Forest's future sustainable growth. The re-instatement of the Chingford – Stratford line and the re-opening of Lea Bridge Station are therefore considered critical to accommodate the projected growth in the borough over the life time of the LDF.

11.14   The Council supports the construction of Crossrail 2 which will help to improve public transport services in the borough. Land as shown in the proposals map will be safeguarded to protect the proposed route.

Land Use Pattern and Design Principles to Encourage Sustainable Transport

11.15   The Council recognises that land use patterns, including the location, type, mix, and intensity of use, strongly influences the travel patterns of the people living, working, or visiting a development. It therefore determines how many trips a development attracts and by what mode. The Council will therefore promote mixed use developments, which reduce the need to travel, and it will encourage developments at locations that either minimise distances or are highly accessibly by sustainable modes. Careful consideration of the location of new development combined with a 'town centre' emphasis to land use planning can have positive impacts on attempts to make travel more sustainable.

11.16   The Council thereby anticipates reducing the need for the transport system to accommodate unnecessary travel demand. This close coordination of land use and transport planning supports the approach taken by the Government in PPG13 and by the Mayor in the draft replacement London Plan.

11.17   New development should incorporate principles to achieve a high quality, connected pedestrian and cycle environment. Maximising permeability and legibility of new developments, ensuring frontage along routes that offer natural surveillance, and providing adequate cycle and pedestrian infrastructure will contribute towards creating a walking and cycle friendly environment.

Sustainable Travel Plans and Transport Assessments

11.18   In order to fully assess the impacts of new developments on the transport network and to identify mitigation measures and opportunities to encourage walking, cycling and public transport use, Transport Assessments and Travel Plans will be required in support of planning applications. Transport Assessments and Transport Statements should be prepared in accordance with the requirements and best practice set out in the DfT Guidance on Transport Assessments (2007) and TfL Transport Assessment Best Practice, Guidance Document (2010).

11.19   To encourage sustainable travel to destinations such as schools and workplaces, it is important that those organisations are engaged and have in place supportive policies and measures such as showers, cycle parking, tax free bike loan schemes, flexible working

policies and car parking management. Therefore, the Council prepares Travel Plans at its own workplaces and encourages high trip generating employers such as Whipp's Cross Hospital and Waltham Forest College to prepare Travel Plans.

Sustainable Transport Network

Walking and cycling

11.20   Encouraging cycling and walking trips will bring multiple benefits to Waltham Forest including reduced congestion on the roads, reduced emissions, improved community cohesions and improved health and fitness opportunities for residents. Approximately half of all trips that currently start in Waltham Forest also finish within the borough indicating a huge number of potentially walkable (less than 2km) or cycleable (less than 5km) journey [63].

11.21   The Council will encourage more cycling and walking for local journeys and will work with neighbouring boroughs and stakeholders to identify and implement new routes. The London Travel Demand Survey indicates that the proportion of walking and cycling for daily purpose trips in Waltham Forest is 29% and 1% respectively and the Council will aim to increase this further.

11.22   Improving the public realm and overcoming existing barriers to pedestrian and cycle movement in particular in the borough's town centres such as Walthamstow, Wood Street, Chingford, Leyton, and Leytonstone will encourage more pedestrian activity (including the elderly and people with disabilities) and therefore contribute to the vitality and viability of the boroughs town centres. The Council is committed to working with TfL and other partners to roll out public realm improvement schemes such as the 'Legible London' scheme, prioritising key destinations and local centres, in order to provide new, simple, and consistent signage and information for pedestrians.

11.23   Similarly, improving safety, routes and parking facilities for cyclists will ensure more journeys are undertaken by bike and pressure on the boroughs public transportation system will be eased. The Council will therefore seek to maximise cycle parking across the borough both in new developments and in the public realm, requiring new developments to contribute to and where appropriate provide appropriate cycle links to strategic cycle routes, and work with TfL and other partners to improve the cycle infrastructure across the borough, including implementation of the TfL cycle hire scheme.

Public Transport

11.24   While many parts of Waltham Forest are well served by public transport, some areas in the north and west of the borough suffer from poor public transport accessibility. In addition, the Central Line stations of Leytonstone and Leyton and the Victoria line suffer from severe crowding difficulties at peak times. Walthamstow Central is now the third busiest bus station in London while interchange service and the town centre itself has some key access and movement issues. [64]

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63   North London - Developing a Sub-Regional Transport Plan, 2010
64   North London - Developing a Sub-Regional Transport Plan, 2010

11.25 Waltham Forest will benefit from planned improvements to London Underground and London Overground to increase service capacity. The Victoria Line is currently being up-graded to achieve an increase in capacity by 21% and to cut journey times by 16%[65]. Work on the Victoria line is expected to be completed in 2012. The Gospel Oak to Barking Overground line has been upgraded to provide a smoother and more reliable service while also increasing the lines capacity to run 4 trains per hour. The Council also has the aspiration to improve the interchange service between Walthamstow Central and Queens Road Overground station.

11.26 In partnership with Transport for London, Waltham Forest Council will seek to improve the bus network. This will include provision of bus stops and facilities and access routes to stops where appropriate.

Managing Private Motorised Transport

11.27 Traffic and congestion is acute within the borough and there are a number of highway congestion hotspots along the A112 road corridor, North Circular and Lea Bridge Road as well as more localised congestion near Walthamstow, Bakers Arms and Leytonstone High Road.

11.28 The Council does not seek to increase capacity of the highway network for motor traffic, but its priority is to increase accessibility for pedestrians, cyclists and public transport. The Council will therefore manage private motorised traffic actively in order to make transport in the borough more sustainable and mitigate the negative impacts associated with traffic.

Highway Network

11.29 A functioning highway network is essential for all modes of transport. This is endorsed by the Mayor's Transport Strategy which reiterates the objective of reducing congestion whilst seeking the efficient use of the road network to cater adequately for all essential traffic movements. The borough's location has placed high pressure on surface transport networks to accommodate both through traffic and local journeys over past decades and this has partly resulted in a vehicular dominated highway network that separates neighbourhoods and local communities from each other rather than connecting them.

11.30 Waltham Forest's highway network has a hierarchy of roads, with different character and functions. The Core Strategy takes account of transport networks and the road hierarchy as defined in the boroughs emerging Local Implementation Plan and the Development Management Policies. The Council will ensure that traffic flow and speed is managed in accordance with this hierarchy to limit detrimental impacts of traffic on local neighbourhoods.

11.31 Streets have more functions than catering for vehicular movement. In accordance with national guidance published by the Department for Transport in the Manual for Streets (place and movement status of street) and the Mayor's Better Streets guidance, the Council twill ensure that a street and indeed the highway network as a whole is considered holistically, with the anticipation to find an appropriate balance between the different users

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65   North London - Developing a Sub-Regional Transport Plan, 2010

they carter for and between the movement and place specific requirements of a street and the network. Where appropriate the Council will seek to re-balance the amenity of the different road users and potentially reallocate road space, in order to remove the visual and functional dominance of motor vehicles in the street, especially in places with high pedestrian demand.

Safety of Transport Network

11.32   The council will ensure road safety is the priority for any traffic management or highway works or proposals. New developments are required to contribute to highway safety and developers will be required to satisfy this by undertaking safety audits at the appropriate stages.

11.33   The latest data received for all road casualties in 2009 shows that the Council has made substantial year-on-year improvements in reducing the numbers of those that are killed or seriously injured in the borough. This has been achieved through the implementation of measures such as 20mph speed zones and design-led improvements to the walking and cycling network including upgrading crossing points. The Council will work with TfL, safety engineers, the police and local residents to investigate long-term opportunities to improve transport safety hot spots.

Parking

11.34   The availability of parking spaces is a key determinant of mode choice and car usage. In order to minimize travel by car and encourage the use of sustainable transport modes instead, the Council anticipates to manage parking carefully and effectively throughout the borough.

11.35   For new developments to function satisfactorily, appropriate levels of parking will need to be established. The Council will seek to avoid over-provision of parking spaces, which is likely to encourage car travel, whilst minimising problems such as overspill parking on adjacent streets, which may arise if the development under-provides parking. Parking for new developments will be provided in accordance with the accessibility of an area and car-free and car-capped developments will be promoted, with maximum standards applied elsewhere.

11.36   The Council will seek to give parking priority to residents, then short term parkers (including shoppers), and then finally long term parkers (including commuters). The Council will also promote, where practical, the re-use of under-utilised car parks for other uses more suitable for town centre uses.

11.37   Further detail will be provided in the emerging Development Management DPD and the Sustainable Transport SPD.

Car clubs and electric vehicles

11.38   Car clubs allow residents and businesses to use cars for occasional trips without having to own a car, which increases residents' options for travel. It has been demonstrated that a single car club vehicle can replace 20 privately owned cars on average and significantly reduce users overall mileage and CO_2 emissions [66].

11.39   Waltham Forest has been successful in implementing a car club scheme and has around 1,000 members since its introduction in 2008. There are currently 17 car-bays in the borough and the Council will continue to expand this over the lifetime of the Plan. Where appropriate, the Council will require new residential developments, to either provide car club facilities or make financial contributions towards the on-street network.

11.40   Electric vehicles and other alternative fuel schemes can contribute towards the reduction of carbon dioxide and other air pollutants. Waltham Forest is committed to work with partners to achieve the Mayor target of 25,000 charge points across London by 2015 [67]. Locations within Waltham Forest where these could be accommodated include company (including the Council) car parks, shopping centres, key arterial routes and in dense residential areas.

Cabs

11.41   Taxis and minicabs are a vital resources for certain journeys often the only travel option available to people without access to a car or disabled people. There is demand for cab pick-up, drop-off down and waiting facilities at a number of locations in Waltham Forest, such as transport interchanges, town centres, and shopping areas.

11.42   The Council will seek to protect and enhance the continued provision of existing cab services within the borough. This includes the provision of affordable business space. Safe pick-up, drop-off and waiting areas for taxis and cabs will be required where this activity is likely to be associated with new development.

Freight

11.43   The movement of goods can have a significant impact on the environment, in terms of noise and disturbance, and air pollution. The Council will therefore seek to minimise the movement of goods and materials by road by promoting sustainable forms of freight movement, such as the use of waterways and rail freight, and seeking to deliver more efficient goods movement.

11.44   We will work with our partners, including Transport for London, developers, freight operators and businesses to explore sustainable freight strategies and delivery and servicing plans (DSP). DSPs are a key tool in delivery of the London Freight Plan and they are designed to cut carbon emissions and local air pollution, congestion, collisions and freight costs by reducing delivery trips (especially during peak periods) and ensuring use of safe and legal loading facilities. DSPs include a range of measures including reducing and consolidating deliveries and increasing out-of-hours delivery activity. They are often integrated into the travel plan process.

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66   Streetcar in Property Developments Waltham Forest (2010)
67   Draft London Plan, 2009

11.45 Where appropriate, the Council will require new developments to prepare DSPs. The Council will expect all developments to include appropriate servicing facilities and to demonstrate that the requirements for servicing both during construction and when in use are satisfied.

Implementation

11.46 Land-use policies outlined elsewhere in the Core Strategy and in the emerging Site Specific Allocations document and the four Area Actions Plans will facilitate the objective to reducing the need to travel.

11.47 The policy will further be implemented by the Council through the Development Management process. The Development Management DPD and forthcoming Sustainable Transport SPD will set out further standards, thresholds and guidance as to how the policies will be achieved and implemented.

11.48 The Local Implementation Plan (LIP) is the key mechanism for prioritising transport policy and projects for Waltham Forest. The Council is currently preparing the second LIP, which has recently been submitted to Transport for London for their consideration. Once approved, TfL will provide funding for projects identified in the LIP over a three year period until 2014.

11.49 Developer contributions represent an additional funding source for projects outlined in the LIP. Sustainable transport improvements will be phased to take account of existing needs and expected new improvements.

11.50 The re-instatement of the Hall Farm Curve (and potential re-opening of the Lea Bridge Station) has been a long-term objective for the Council. The Council has established the scheme's business case and is currently in discussion with Transport for London, the Department for Transport and Network Rail with the aim of securing inclusion of the scheme in the national rail programme for 2014 – 2019. The Council is also currently seeking its inclusion within the transport schemes of the revised London Plan.