

Assessing the Walthamstow Interim Planning Policy Framework

White Young Green Environmental (WYGE) was commissioned by the London Borough of Waltham Forest (LBWF) to undertake the first stage of the Sustainability Appraisal (SA) process for the whole of Waltham Forest under the Borough's proposed Local Development Framework (LDF).

Waltham Forest is currently operating under a Unitary Development Plan that will be replaced with a LDF for the Borough post 2009. However, in the interim period, planning documents developed by LBWF will follow the LDF process closely so that they may conform with the proposed LDF when it is adopted.

WYGE has developed a SA for the proposed LDF that resulted in the production of a SA Scoping Report and Sustainability Appraisal Objectives. This report is available as part of the development of a vision for Walthamstow.

This report details the fourth stage in the SA for the Walthamstow plans, a sustainability appraisal of the Interim Planning Policy Framework, the policy context for the delivery of the Masterplan. A sustainability appraisal has already been undertaken for the 3 options previously consulted on in March 2007 and the preferred option (that forms the masterplan) consulted on October - December 2007.

In this document, the Vision for Walthamstow: Interim Planning Policy Framework (IPPF) is assessed by the London Borough of Waltham Forest against the Sustainability Objectives that are set out in the SA Scoping Report. The IPPF draws together already adopted policies from both the Unitary Development Plan (2006) and The London Plan (2004) to guide development to deliver the

masterplan. As such there is no new principles or policies which this SA assesses. The Appraisal does however give an understanding of the impacts of the IPPF on Walthamstow.

At the completion of the SA process, recommendations for the mitigation of negative impacts associated with the IPPF are developed.

The purpose of this Option Appraisal is to present the findings in a manner that could be used for consultation regarding the IPPF. This report has the following format:

Chapter 1 Introduction

Chapter 2 Option Assessment *Provides details of the Sustainability Appraisal objectives against which the Walthamstow Town Centre IPPF has been assessed.*

Chapter 3 Next Steps

Appendix A Sustainability Objectives

CHAPTER 1 - INTRODUCTION

By White Young Green

1.1 Requirement for Sustainability Appraisal

Sustainability Appraisal is a process through which the sustainability of a plan under preparation is assessed. The Planning and Compulsory Purchase Act (2004) requires local planning authorities to carry out a SA of their LDF process. All Development Plan Documents (DPDs) for adoption under the new LDF must undergo SA and Strategic Environmental Assessment (SEA). SEA is a requirement of the EU Directive 2001/42 on the Assessment of Certain Plans and Programmes on the Environment more commonly known as the SEA Directive.

The principal objective of the SEA Directive as stated in Article 1 is:

“...to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans ... with a view to promoting sustainable development...”

The SEA Directive was brought into effect in the United Kingdom (UK) on 21st July 2004 through the Environmental Assessment of Plans and Programmes Regulations. Local planning authorities are required to carry out an environmental assessment of their LDF under these regulations.

Sustainability Appraisal involves a thorough assessment of the impacts of the proposed development. For this reason, SA addresses the interlocking social, economic, and environmental issues. Although the statutory requirements for carrying out Sustainability Appraisal and SEA are distinct it is possible to satisfy both through a single but integrated

Sustainability Appraisal process. Such a joint approach is advocated in ODPM guidance. For ease of reference, the combined SEA and Sustainability Appraisal process is simply referred to as Sustainability Appraisal throughout this Report.

1.2 Sustainability Appraisal Process

SEA is a means of evaluating the environmental acceptability of a plan in a formalised and systematic manner by identifying key environmental issues associated with the study area and how adoption of the plan will influence them.

SEA occupies a central position in the hierarchy of land use planning, sitting between high-level government planning policy and environmental assessment at project level. The SEA process considers similar issues to project level environmental assessment but differs in that the existing environment is examined in broad terms and strategic options are evaluated against environmental objectives. This is because the site specific information needed to complete a project level environmental assessment and quantify environmental effects is not available at the strategic stage.

Sustainability Appraisal differs from SEA in that it expands the focus of the assessment process to encompass social and economic issues. Sustainability Appraisal is described by the ODPM (2004) guidance as:

“An iterative process that identifies and reports on the likely significant effects of the plan and the extent to which implementation of the plan will achieve the social, environmental and economic objectives by which sustainable development can be defined.”

The combined Sustainability Appraisal process identifies key social, economic, and environmental issues associated with the LBWF and how adoption of the proposed Plans will influence them. It will ensure that significant effects arising from the Walthamstow Interim Planning Policy Framework (IPPF) (and subsequent Area Action Plan) are either avoided or mitigated.

The process will also identify requirements (or indicators) for monitoring the implementation of the Area Action Plan following its adoption. Monitoring will identify any unforeseen impacts and inform the next revision or replacement. The Sustainability Appraisal process must be fully integrated into the Area Action Plan process.

1.3 Objectives of Sustainability Appraisal in the Option Assessment

The key objective in undertaking Sustainability Appraisal is to ensure that any significant effects arising from adoption of the Area Action Plan (or in this case the IPPF) are (at least in principle) acceptable to the LBWF and other stakeholders. Undertaking Sustainability Appraisal allows for the social, economic and environmental acceptability of the strategic options to be determined and thus taken into account in the decision making process.

However, it should be noted that whilst the Sustainability Appraisal will inform the decision making process, the Area Action Plan may not always recommend the strategic option that is considered most sustainable. Where the most sustainable option is not selected as the preferred option, this will be justified accordingly.

1.4 Background to the Walthamstow Blueprint

Walthamstow is at the heart of the borough, both geographically and economically. The last five years has seen a major change in the prospects for Walthamstow. It is now an economically healthy local town centre with few empty or vacant retail units or market stalls and considerable investor interest in a number of key sites.

At a time of increased pressures for development, particularly housing and changes to the planning system as a result of Planning and Compulsory Purchase Act 2004, Planning reform Bill and associated legislation and national guidance there is a requirement to provide clear guidance on the future of Walthamstow Town Centre in order to ensure that its future viability and diversity will be protected and enhanced in accordance with planning policy objectives. It is felt that the future viability and competitiveness of Walthamstow could be reduced unless there is a clear policy framework for the future development of sites within the town centre.

This Interim Planning Policy Framework (IPPF) is a non-statutory document which provides policy guidance that bridges the Unitary Development Plan 2006 (UDP) and more recent adopted national and regional policy. It seeks to ensure that during preparation of statutory planning documents, such as the Local Development Framework and Area Action Plan for Walthamstow, development proposals will not prejudice the long-term vision and viability of the town

centre, but contribute positively to the town centre.

The London Borough of Waltham Forest entered into a partnership with the Prince's Foundation for the Built Environment to draw up a masterplan for the future of Walthamstow.

The new planning regulations set by central government require that a series of options be presented to the community for consultation before a final option is presented for consultation. Therefore the Prince's Foundation developed a series of options with input from the community, local businesses, Councillors, regional and local government offices and The Foundation's wide range of world-wide experienced experts. These options were widely consulted on and the results were fed into a second option design process producing a preferred option. There was widespread public engagement on the preferred option and the amended preferred option has become the masterplan. The IPPF being assessed here pulls together appropriate national, regional and local planning policy to guide development within the town centre to deliver the masterplan.

1.5 Sustainability Appraisal Methodology in the Option Assessment

The Sustainability Appraisal process adopted by WYGE for the proposed LBWF Local Development Framework (LDF) has been developed following current guidance produced by the ODPM. The Sustainability Appraisal process involves the following steps organised according to the ODPM (2005) guidance stages:

STAGE A Setting the context and objectives, establishing the baseline and deciding on the scope

- A1: Identifying other relevant policies, plans, programmes and sustainability objectives.

- A2: Collating baseline information.
- A3: Identifying sustainability issues and problems.
- A4: Developing the SA Framework.
- A5: Consulting on the scope of the SA - Stage A has been completed

STAGE B Developing and refining options and assessing effects

- B1: Testing the Development Plan Documents (DPD) revision objectives against the SA framework.
- B2: Developing the DPD options.
- B3: Predicting the effects of the DPD.
- B4: Evaluating the effects of the DPD
- B5: Considering ways of mitigating adverse effects and maximizing beneficial effects.
- B6: Proposing measures to monitor the significant effects of implementing the DPDs.

We are currently at stage B3, predicting the effects of the DPD, or in this case the IPPF.

CHAPTER 2 - OPTIONS ASSESSMENT

Assessment devised by White Young Green and undertaken by LBWF

2.1 Testing the Walthamstow IPPF

In order to determine whether the Walthamstow IPPF is in accordance with established sustainability principles, the compatibility of identified options against agreed SA objectives has been evaluated. The Walthamstow IPPF has been assessed using the above Sustainability Appraisal objectives (see Appendix A) and taking into account the key issues identified during Stage A.

For the IPPF strategic objectives, it has been determined whether the option will move towards, or away from, achievement of the sustainability objective. In some cases the IPPF objective will have no influence on the sustainability objective or the “sustainability outcome” and will be determined by how the IPPF is implemented and whether its implementation would move towards or away from the achievement of an agreed sustainability objective. This is illustrated through the use of symbols in the Options Appraisal Matrices.

In each matrix, commentary has been provided to explain the likely effects that have been identified. In addition, where necessary, changes to the option or mitigation measures have been recommended to reduce potential adverse effects and maximise beneficial effects.

Walthamstow: Options Assessment cont.

- ✓ Minor beneficial. Option moving towards the achievement of Sustainability Appraisal objective
- ✓ ✓ Moderate beneficial. Option moving towards the achievement of Sustainability Appraisal objective
- ✓ ✓ ✓ Significant beneficial. Option moving towards the achievement of Sustainability Appraisal objective
- X Option moving away from achievement of Sustainability Appraisal objective
- ? Unknown: depends on how the option will be implemented
- n Neutral: no relationship with Sustainability objective
- m Mitigation

Sustainable Appraisal Objective	Baseline: No development and no change to current situation (undertaken by WYGE)	IPPF strategic objectives: (undertaken by LBWF)
1. Sufficient affordable housing	X <ul style="list-style-type: none"> • No additional housing or change to current situation. • Currently able to re-house less than 10% of cases on the housing register due to shortage of affordable housing 	<ul style="list-style-type: none"> ✓ ✓ ✓ • Anticipated potential of 2,400 new homes provided • All housing over 10 units to provide 40% affordable • A mix of housing size, type and tenure to be provided • All new homes to be developed to life-time homes standards
2. Reduce waste/ increase recycling	n <ul style="list-style-type: none"> • This objective is in the Council's Best Value Performance Plan for 2005-2008. The aim is through the introduction of household recycling; to increase the household recycling composting rate. 	<ul style="list-style-type: none"> ✓ ✓ • Planning policy require all new build to provide recycling facilities • Larger developments to exceed standards
3. Conserve energy	? <ul style="list-style-type: none"> • No conservation in energy but there is the potential to improve if any refurbishment takes place. • The LBWF Improvement Plan aims to increase SAP energy efficiency rating in Private Sector Housing from 35-55 by April 2008 	<ul style="list-style-type: none"> ✓ ✓ • Planning policy requires units over 10 units to provide 10% of energy from renewable sources and reduce CO2 emissions by 20% • Larger developments to exceed standards • Improved pedestrian and public transport links to reduce car born traffic • Reuse of key buildings • Mixed use and increased density in line with The London Plan will reduce reliance on cars , creating a more sustainable town centre
4. Protect/ enhance water, soil, air quality	n <ul style="list-style-type: none"> • All will continue to decline in the absence of intervention 	<ul style="list-style-type: none"> ✓ ✓ ✓ • Planning policy requirement for car free or reduced car development will enhance air quality • Building management technology in new builds used to

				<ul style="list-style-type: none"> minimise pollution Development of transport efficiency model (intensification around transport nodes) and car sharing schemes proposed to reduce use of car
5. Reduce crime/ fear of crime	?	<ul style="list-style-type: none"> The LBWF Improvement Plan sets a target to increase by 10% the number of people who feel safe by March 2008 	✓ ✓ ✓	<ul style="list-style-type: none"> Improved links encourage pedestrian/ cycle movement Increased permeability and walkability of the area along and around the High Street and improves safety and security in this area New residential community for town centre and encouragement of night-time activity providing natural surveillance Increase in provision of mixed-use developments increasing activity at all times of day and night
6. Improve health/ wellbeing	?	<ul style="list-style-type: none"> Potential plans to improve St James Street Health Centre 	✓ ✓ ✓	<ul style="list-style-type: none"> Improved links encourage pedestrian/ cycle movement Better integration of public transport Planned approach allows for better planning for additional health provision for the new communities
7. Increase provision of and access to community facilities to meet local cultural, recreational and social needs	X	<ul style="list-style-type: none"> No provision for facility development 	✓ ✓	<ul style="list-style-type: none"> New community facilities to be provided, located around focal points at the centre of neighbourhoods, which will be within easy access of everyone Planning obligations will be expected to add to and improve provision of open and recreational space
8. Improve condition of public/ private housing	n	<ul style="list-style-type: none"> No change 	✓ ✓	<ul style="list-style-type: none"> Additional mixed tenure and income housing provision Improved town centre encourages individual investment into private housing stock
9. Conserve/ enhance ecology/ increase understanding	n	<ul style="list-style-type: none"> No change 	✓ ✓ ✓	<ul style="list-style-type: none"> Building on brownfield land New formal public green spaces Protection of existing Conservation area at western end of the High Street
10. Clean, well maintained attractive public realm	n	<ul style="list-style-type: none"> Limited funding for improvements or for high level maintenance of existing spaces 	✓ ✓ ✓	<ul style="list-style-type: none"> Improved and new public realm, green spaces Holistic management framework proposed (this is outside the remit of the IPPF but is addressed through the masterplan)
11. Preserve historic environment, improve access to culture	n	<ul style="list-style-type: none"> No change 	✓ ✓ ✓	<ul style="list-style-type: none"> Clearly identified policies on preservation and enhancement of the setting of listed buildings/ conservation areas Reuse of some existing buildings
12. Maintain/ enhance vitality of	?	<ul style="list-style-type: none"> No change, so only the 'maintain' state will be applicable. 	✓ ✓ ✓	<ul style="list-style-type: none"> Consolidating existing retail core and provision of new uses, including leisure and entertainment, to

town centres		<ul style="list-style-type: none"> There is limited future funding for enhancement 		<p>strengthening town centre.</p> <ul style="list-style-type: none"> Improved environment and increase in population density in town centre Mix of uses providing greater employment opportunities in both retail and commercial Planning obligations will include employment and skills training provision
13. Attract investment to improve local economy	X	<ul style="list-style-type: none"> The town centre is currently a thriving local centre but with the threat of Stratford City and other town centre developments without future investment and intervention the town centre will start to decline 	✓ ✓ ✓	<ul style="list-style-type: none"> Provide clear guidance for developers, reducing risk and therefore promoting attractiveness of investment potential in the area Changing profile of Walthamstow Improved public realm and accessibility New retail and commercial space New day time workforce with increase in commercial/ office space provision New opportunities for night time and café economy including cinema
14. Improve educational attainment	n	<ul style="list-style-type: none"> No change 	✓ ✓	<ul style="list-style-type: none"> S106 education contribution Planned approach allows for the forward planning for additional education provision for new communities Planning obligations may include contributions to education
15. Improve education and training for all residents, particularly for employment	n	<ul style="list-style-type: none"> No change 	✓ ✓ ✓	<ul style="list-style-type: none"> Improved access to employment including the provision of new commercial and retail space Better integration of public transport to town centre Business Improvement District proposed, making the town centre more prosperous (this is not covered by the IPPF but is addressed in the masterplan) Planning obligations to including training opportunities
16. Reduce overall level of deprivation	X	<ul style="list-style-type: none"> Analysis shows that Waltham Forest has been ranked 47 out of 354 districts (with 1 being the most deprived) and is the 12th most deprived borough in London. At present there are 45 SOAs in Waltham Forest that are in the top 20% and 11 in top 10% of the most deprived in the country and one (in Hoe Street Walthamstow Town Centre) in the top 5% most deprived 	✓ ✓ ✓	<ul style="list-style-type: none"> Greater potential levels of public and private investment Mixed use developments, more sustainable and efficient use of land New housing provision through mixed tenure and income housing therefore diversifying the demographics of the town centre Improved public realm including long term management New business opportunities for all sectors and levels
17. Encourage	M	Mitigation – need to ensure community	✓ ✓ ✓	<ul style="list-style-type: none"> New community facilities, education provision and new

community understanding cohesion and participation		engagement and consultation maximizes attendance at consultation events, involvement of community in design development, encourage involvement in community events		residential community for town centre proposed or will be requested through planning obligations
18. Ensure safe, integrated transport to access facilities/ jobs. Concentrating development at transport hubs	✓	<ul style="list-style-type: none"> Walthamstow has good transport links to the City and to Chingford in the North on the over ground line, to Victoria via central London on the Victoria underground line and has the 3rd busiest bus station in London The retail offer, including the street market (as well as a wide range of housing) is available within walking distance of this transport interchange 	✓ ✓ ✓	<ul style="list-style-type: none"> Public transport highlighted as a key driver of future investment and development of the town centre Improved access to public transport system Integrated approach to transport system including vehicle borne traffic, pedestrian environment Structure of town centre to provide clustered developments around existing transport hubs Planning obligation contributions to key transport modes
Total	0 ✓ ✓ ✓ 0 ✓ ✓ 0 ✓ 5 X 4 ? 8 n	Option Ranking: 4 Least beneficial in moving towards achievement of Sustainability Appraisal Objective.	13 ✓ ✓ ✓ 5 ✓ ✓ 0 ✓ 0 X 0? 0 n	Option Ranking: 1 Most beneficial in moving towards achievement of Sustainability Appraisal Objective.

IPPF against preferred option and options A-C as undertaken previously and consulted on in October 2007 and March 2007:

Baseline		Option A		Option B		Option C		Preferred Option and IPPF	
0 ✓ ✓ ✓	Ranking: 5	1 ✓ ✓ ✓	Ranking: 4	7 ✓ ✓ ✓	Ranking: 3	11 ✓ ✓ ✓	Ranking: 2	13 ✓ ✓ ✓	Ranking: 1
0 ✓ ✓	Least beneficial in moving towards achievement of Sustainability Appraisal Objectives	5 ✓ ✓	Moderately beneficial in moving towards achievement of Sustainability Appraisal Objectives.	10 ✓ ✓	Beneficial in moving towards achievement of Sustainability Appraisal Objectives.	7 ✓ ✓	Most beneficial of original options in moving towards achievement of SA Objectives	5 ✓ ✓	Most beneficial of all options in moving towards achievement of Sustainability Appraisal Objectives
0 ✓		7 ✓		1 ✓		0 ✓		0 ✓	
5 X		0 X		1 X		0 X		0 X	
4 ?		1 ?		0 ?		0 ?		0 ?	
8 n		4 n		1 n		0 n		0 n	

3.0 Next Steps by White Young Green

The Appraisal Matrices above, together with comments and mitigation notes, form the second stage (Stage B) of the Sustainability Appraisal of the LBWF IPPF assessment process for the development of Walthamstow Town Centre.

The next steps of the Sustainability Appraisal and of the Walthamstow Interim Planning Policy Framework are noted in Table 3.1 below.

Table 3.1 - Next Steps in the Sustainability Appraisal of Area Action Plan

ODPM Stage	Sustainability Appraisal Steps	Links to LDF Process
B2	Consultation on the Sustainability Appraisal of the emerging options.	The results of consultation will feed into the selection of the Preferred Option.
B3	Predict and assess the significant effects of the Walthamstow Preferred Option.	Undertaken after draft Preferred Option developed. The Preferred Option will then need to be revised in line with any findings.
B4	Evaluate the effects of the Develop Plan Document.	Undertaken after draft IPPF is selected. The IPPF will then need to be revised in line with any findings.
B5	Develop mitigation for any adverse effects and to maximise beneficial effects.	
B6	Develop recommendations for monitoring and indicators. Draft indicators have been developed at scoping stage.	

Appendix A: Waltham Forest Sustainability Objectives by WYGE

Objective	Economic	Social	Environmental
(1) Provide sufficient affordable housing of good quality to meet local needs, making good use of derelict and vacant property bearing in mind their nature conservation value	✓	✓	✓
(2) Reduce production of waste and increase recycling		✓	✓
(3) Conserve energy		✓	✓
(4) To protect and enhance water, soil and air quality through reducing pollution			✓
(5) To reduce crime and the fear of crime and to ensure public safety		✓	
(6) Improve standard of health and wellbeing of those who live and work in the borough		✓	
(7) To increase the provision of and access to community facilities to meet local cultural, recreational and social local needs		✓	
(8) Improve condition of public and private housing stock		✓	✓
(9) To conserve and enhance all aspects of the ecological environment, in particular designated sites and protected species, and provide opportunities for local residents to access and understand these including consideration of biodiversity within new development		✓	✓
(10) Provide a clean well maintained public realm		✓	✓
(11) To preserve and enhance all aspects of the historic environment and to provide opportunities for all residents to access and understand local cultural heritage		✓	✓
12) Maintain and enhance the vitality and viability of the borough's town centres	✓	✓	
(13) Improve the local economy, by attracting inward investment	✓		
(14) Improve educational attainment in schools		✓	
(15) To provide and improve the existing education and training opportunities for all local residents of all age groups, including the young, deprived, disabled, the elderly and particularly to enable access to local employment	✓	✓	
(16) Reduce the overall level of deprivation	✓	✓	
(17) Encourage community understanding, cohesion and participation		✓	
(18) Ensure a safe integrated transport system that provides easy access to local facilities and jobs and concentrate new development at transport hubs	✓	✓	✓

