

Sustainability Appraisal (SA) of the Blackhorse Lane Area Action Plan

SA Report



December 2012

Prepared for:
Waltham Forest
Borough Council

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TABLE OF CONTENTS

INTRODUCTION.....1

1 BACKGROUND2

2 SA EXPLAINED2

3 STRUCTURE OF THIS SA REPORT2

PART 1: WHAT’S THE SCOPE OF THE SA?4

4 INTRODUCTION (TO PART 1).....5

5 WHAT IS THE PLAN SEEKING TO ACHIEVE?.....6

6 WHAT’S THE SUSTAINABILITY ‘CONTEXT’?.....7

7 WHAT’S THE SUSTAINABILITY ‘BASELINE’ AT THE CURRENT TIME?11

8 WHAT’S THE BASELINE PROJECTION?15

9 WHAT ARE THE KEY ISSUES THAT SHOULD BE A FOCUS OF THE APPRAISAL?.....16

PART 2: WHAT HAS PLAN-MAKING / SA INVOLVED UP TO THIS POINT?.....18

10 INTRODUCTION (TO PART 2).....19

11 ALTERNATIVE APPROACHES TO ADDRESSING AREA-WIDE POLICY ISSUES19

12 ALTERNATIVE APPROACHES TO DEVELOPING ‘OPPORTUNITY SITES’25

13 PREFERRED OPTIONS30

PART 3: WHAT ARE THE APPRAISAL FINDINGS AT THIS CURRENT STAGE?.....33

14 INTRODUCTION (TO PART 3).....34

15 APPRAISAL OF THE DRAFT (PROPOSED SUBMISSION) AAP34

16 CONCLUSIONS AT THIS CURRENT STAGE.....51

17 RECOMMENDATIONS AT THIS CURRENT STAGE.....52

PART 4: WHAT ARE THE NEXT STEPS (INCLUDING MONITORING)?.....53

18 INTRODUCTION (TO PART 4).....54

19 PLAN FINALISATION, ADOPTION AND MONITORING54

APPENDIX I: REGULATORY REQUIREMENTS55

APPENDIX II: ALTERNATIVES APPRAISAL (HOUSING DENSITY).....58

APPENDIX III: ALTERNATIVES APPRAISAL (AFFORDABLE HOUSING).....60

APPENDIX IV: ALTERNATIVES APPRAISAL (EMPLOYMENT).....62

APPENDIX V: ALTERNATIVES APPRAISAL (NEIGHBOURHOOD CENTRES).....64

APPENDIX VI: ALTERNATIVES APPRAISAL (DESIGN AND LOCAL CHARACTER).....66

APPENDIX VII: ALTERNATIVES APPRAISAL (PUBLIC OPEN SPACE AND NATURE CONSERVATION).....68

APPENDIX VIII: ALTERNATIVES APPRAISAL (FLOOD RISK).....70

APPENDIX IX: ALTERNATIVES APPRAISAL (TRANSPORT).....72

APPENDIX X: ALTERNATIVES APPRAISAL (SOCIAL INFRASTRUCTURE).....74

APPENDIX XI: ALTERNATIVES APPRAISAL (STATION HUB AND WATERFRONT SITE).....76

APPENDIX XII: ALTERNATIVES APPRAISAL (CAR WASH AND GARAGE SITE)79
APPENDIX XIII: ALTERNATIVES APPRAISAL (BLACKHORSE ROAD/ HAWARDEN ROAD SITE).....81
APPENDIX XIV: ALTERNATIVES APPRAISAL (WILLOWFIELDS SCHOOL SITE)83
APPENDIX XV: ALTERNATIVES APPRAISAL (SUTHERLAND ROAD SITES).....85
APPENDIX XVI: ALTERNATIVES APPRAISAL (SUTHERLAND ROAD SITE - BHL4 SOUTH).....87
APPENDIX XVII: ALTERNATIVES APPRAISAL (BILLET WORKS SITE)89
APPENDIX XVIII: ALTERNATIVES APPRAISAL (152/154 BLACKHORSE ROAD SITE)91

INTRODUCTION

1 BACKGROUND

- 1.1.1 URS is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Blackhorse Lane Area Action Plan. SA is a mechanism for considering and communicating the likely effects of a draft plan, and alternatives, in terms of sustainability issues, with a view to avoiding and mitigating adverse effects and maximising the positives. SA of the Area Action Plan is a legal requirement.¹

2 SA EXPLAINED

- 2.1.1 It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which were prepared in order to transpose into national law the EU Strategic Environmental Assessment (SEA) Directive.²

- 2.1.2 The Regulations require that a report is published for consultation alongside the draft plan that *'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'*.³ The report must then be taken into account, alongside consultation responses, when finalising the plan.

- 2.1.3 The Regulations prescribe the information that must be contained within the report, which for the purposes of SA is known as the 'SA Report'. Essentially, there is a need for the SA Report to answer the following four questions:

1. What's the scope of the SA?
 - This question must be answered subsequent to a review of the sustainability context and baseline, and consultation with designated environmental authorities.
2. What has Plan-making / SA involved up to this point?
 - Preparation of the draft plan must have been informed by at least one earlier plan-making / SA iteration at which point alternatives are assessed.
3. What are the appraisal findings at this current stage?
 - i.e. what are the likely significant effects of the draft plan and what changes might be made in order to avoid or mitigate negative effects and enhance the positives.
4. What happens next?
 - In particular, there is a need to present 'measures envisaged concerning monitoring'.

- 2.1.4 These questions are derived from Schedule 2 of the Regulations, which present the information to be provided within the report under a list of ten points. **Table 1.1** makes the links between the ten Schedule 2 requirements and the four SA questions. **Appendix I** of this SA Report explains the process of 'making the links' in more detail.

3 STRUCTURE OF THIS SA REPORT

- 3.1.1 The four SA questions are answered in turn across the four subsequent parts of this Report.

¹ The Area Action Plan is a 'Local Plan' as defined by the Town and Country Planning (Local Planning) (England) Regulations 2012 and hence an SA Report must be published for consultation alongside the 'Proposed Submission' Plan document.

² Directive 2001/42/EC

³ Regulation 12(2)

Table 1.1: Questions that must be answered within the SA Report

SA REPORT QUESTION	SUB-QUESTION	CORRESPONDING REQUIREMENT (THE REPORT MUST INCLUDE...)
What's the scope of the SA?	What's the Plan seeking to achieve?	<ul style="list-style-type: none"> An outline of the contents and main objectives of the plan
	What's the sustainability 'context'?	<ul style="list-style-type: none"> The relationship of the plan with other relevant plans and programmes The relevant environmental protection objectives, established at international or national level
	What's the sustainability 'baseline' at the current time?	<ul style="list-style-type: none"> The relevant aspects of the current state of the environment The environmental characteristics of areas likely to be significantly affected
	What's the baseline projection?	<ul style="list-style-type: none"> The likely evolution of the current state of the environment without implementation of the plan
	What are the key issues that should be a focus of SA?	<ul style="list-style-type: none"> Any existing environmental problems / issues which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance
What has Plan-making / SA involved up to this point?		<ul style="list-style-type: none"> An outline of the reasons for selecting the alternatives dealt with (and thus an explanation of why the alternatives dealt with are 'reasonable') The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting preferred alternatives / a description of how environmental objectives and considerations are reflected in the draft plan.
What are the appraisal findings at this current stage?		<ul style="list-style-type: none"> The likely significant effects on the environment associated with the draft plan The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan
What happens next (including monitoring)?		<ul style="list-style-type: none"> A description of the measures envisaged concerning monitoring

PART 1: WHAT'S THE SCOPE OF THE SA?

4 INTRODUCTION (TO PART 1)

4.1.1 This is Part 1 of the SA Report, the aim of which is to introduce the reader to the scope of the SA. In particular, and as required by the Regulations⁴, this Chapter answers the series of questions below.

Table 4.1: Scoping questions answered

SCOPING QUESTION	CORRESPONDING REQUIREMENT (THE REPORT MUST INCLUDE...)
What's the Plan seeking to achieve?	<ul style="list-style-type: none"> • An outline of the contents, main objectives of the plan'
What's the sustainability 'context'?	<ul style="list-style-type: none"> • The relationship of the plan with other relevant plans and programmes' • The relevant environmental protection objectives, established at international or national level
What's the sustainability 'baseline' at the current time?	<ul style="list-style-type: none"> • The relevant aspects of the current state of the environment • The environmental characteristics of areas likely to be significantly affected
What's the baseline projection?	<ul style="list-style-type: none"> • The likely evolution of the current state of the environment without implementation of the plan'
What are the key issues that should be a focus of SA?	<ul style="list-style-type: none"> • Any existing environmental problems / issues which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance

4.2 Consultation on the scope

4.2.1 The Regulations require that: *'When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies'*. In England, the consultation bodies are Natural England, The Environment Agency and English Heritage.⁵ As such, these authorities were consulted on the scope of this SA in 2008. This consultation was achieved by providing a 'Scoping Report' for their comment. The Scoping Report was subsequently finalised and is now available online @

<http://www.walthamforest.gov.uk/documents/wf-sa-scoping-report-finaloct08.pdf>

⁴ Environmental Assessment of Plans and Programmes Regulations 2004

⁵ In-line with Article 6(3).of the SEA Directive, these consultation bodies were selected because *'by reason of their specific environmental responsibilities,[they] are likely to be concerned by the environmental effects of implementing plans and programme'.*

5 WHAT IS THE PLAN SEEKING TO ACHIEVE?

The SA Report must include...

- An outline of the contents, main objectives of the plan

5.1.1 The adopted Waltham Forest Core Strategy anticipated that Blackhorse Lane has the capacity to accommodate growth in the region of 2500 new homes, and 1000 new jobs. The Area Action Plan (AAP) will set out a framework for how growth should be co-ordinated, to secure a sustainable pattern of development and maximum community gains. It will set out where new housing and businesses should go, as well as proposed infrastructure improvements to support this growth. This includes new and improved pedestrian/ cycle routes, open spaces, and community facilities such as schools and health centres. Once adopted, the AAP will be a statutory document used to determine planning applications in the area. It compliments, and should be read alongside the Core Strategy and Development Management Policies. The AAP should also be read alongside the Urban Design Framework that has been prepared and includes planning and design briefs for opportunity sites at the Station Hub and Sutherland Road.

Objectives of the Area Action Plan

5.1.2 The following objectives are the basis for the detailed approach set out within the AAP:

- **A Neighbourhood Centre** - To ensure Blackhorse Lane has a clear neighbourhood centre, which provides a range of shops and services to meet the needs of local residents and businesses, and encourages passers-by to spend more time in the area.
- **A Place to Live** - To provide a range of high quality homes that attracts young single people and families to live in the area, as part of a mixed and balanced community that also caters for local housing need.
- **A Green Place** - To ensure existing and new residents and workers in the area have better access to a range of open spaces, including Walthamstow Wetlands, Lee Valley Regional Park, and the Olympic Park.
- **A Well Designed Place** - To enhance the image of Blackhorse Lane by ensuring all new developments in the area are designed to a high standard and fit for purpose, and interact well with their surroundings, especially blue/ green spaces.
- **A place for Creative and Green Industries** - To ensure Blackhorse Lane continues to provide a range of jobs for residents, and support the retention and growth of creative and green industries in the area.
- **A Sustainable Place** - To ensure new developments incorporate the highest levels of sustainable design and their impact on climate change is minimised.
- **A Connected Place** - To encourage movement both within Blackhorse Lane and to areas outside of it, by walking, cycling and public transport; and minimising the need for private car use.
- **A Community Place** - To enhance or provide a range of new facilities to meet the needs of existing and new residents and businesses, in order to strengthen 'community spirit'.

5.2 What's the plan not trying to achieve?

5.2.1 It is important to emphasise that the plan will be strategic in nature. Even the allocation of sites should be considered a strategic undertaking, i.e. a process that omits consideration of some detailed issues in the knowledge that these can be addressed further down the line (through the planning application process). The strategic nature of the plan is reflected in the scope of the SA.

6 WHAT'S THE SUSTAINABILITY 'CONTEXT'?

The SA Report must include...

- The relationship of the plan with other relevant plans and programmes
- The relevant environmental protection objectives, established at international or national level

6.1 Introduction

6.1.1 An important step when seeking to establish the appropriate 'scope' of an SA involves reviewing 'sustainability context' messages (e.g. issues, objectives or aspirations) set out within relevant published plans, policies, strategies and initiatives (PPSIs). Sustainability context messages are important, as they aid the identification of the 'key sustainability issues' that should be a focus of the SA. Key messages from this review are summarised below.

6.2 The National Planning Policy Framework⁶

6.2.1 In March 2012 the National Planning Policy Framework (NPPF) was published. The NPPF, read as a whole, constitutes 'the Government's view of what sustainable development in England means in practice for the planning system. The NPPF supersedes most PPSs and PPGs. The following is a summary of the new guidance included in the NPPF that is of relevance to this SA.

Air quality

6.2.2 New and existing developments should be prevented from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of air pollution. This includes taking into account the presence of Air Quality Management Areas and cumulative impacts on air quality.

Biodiversity and open space

6.2.3 Impacts on biodiversity should be minimised, with net gains in biodiversity to be provided wherever possible. To contribute to national and local targets on biodiversity, planning should promote the 'preservation, restoration and re-creation of priority habitats, ecological networks' and the 'protection and recovery of priority species'. High quality open spaces should be protected or their loss mitigated, unless a lack of need is established.

Climate change adaptation

6.2.4 Planning authorities should take account of the long term effects of climate and 'adopt proactive strategies' to adaptation, with new developments planned to avoid increased vulnerability to climate change impacts.

6.2.5 In terms of flooding, development should be directed away from areas highest at risk and should not be allocated if there are 'reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding'. The NPPF states that local planning authorities should avoid 'inappropriate development in vulnerable areas or adding to the impacts of physical changes to the coast' in order to reduce the risk posed from coastal change.

⁶ CLG (2012) National Planning Policy Framework [online] available at: <http://www.communities.gov.uk/documents/planningandbuilding/pdf/2116950.pdf> (accessed 08/2012)

Climate change mitigation

- 6.2.6 Supporting the ‘transition to a low carbon future in a changing climate’ is regarded as a ‘core planning principle’. A key role for planning in securing reduced GHG emissions is envisioned, with specific reference made to meeting the targets set out in the Climate Change Act 2008⁷. Specifically, planning policy should support the move to a low carbon future through:
- planning for new development in locations and ways which reduce GHG emissions; and
 - positively promoting renewable energy technologies and considering identifying suitable areas for their construction.

Community: Health, Crime and Social equity

- 6.2.7 The social role of the planning system is defined as ‘supporting vibrant and healthy communities’, with a ‘core planning principle’ being to ‘take account of and support local strategies to improve health, social and cultural wellbeing for all’.

Cultural heritage

- 6.2.8 The planning system should protect and enhance valued landscapes. Heritage assets should be recognised as an ‘irreplaceable resource’ that should be conserved in a ‘manner appropriate to their significance’, taking account of ‘the wider social, cultural, economic and environmental benefits’ of conservation, whilst also recognising the positive contribution new development can make to local character and distinctiveness.

Economy & employment

The contribution the planning system can make to building a strong, responsive economy is highlighted. This should include ‘identifying and coordinating development requirements, including the provision of infrastructure’. There is a need to support new and emerging business sectors, including positively planning for ‘clusters or networks of knowledge driven, creative or high technology industries’.

Education

- 6.2.9 Ensuring that there is a ‘sufficient choice of school places’ is of ‘great importance’. Local planning authorities must ‘work with other authorities and providers’ in order to access the current ‘quality and capacity’ of infrastructure for education, plus its capability of meeting ‘forecast demand’.

Good design

- 6.2.10 The NPPF attaches great importance to the design of the built environment. It explains how good design is a key aspect in sustainable development, and how development should improve the quality of the area over its lifetime, not just in the short term. Good architecture and landscaping are important, with the use of design codes contributing to the delivery of high quality outcomes. Design should reinforce local distinctiveness, raise the standard more generally in the area and address the connections between people and places.

Housing

- 6.2.11 Local planning authorities should meet the ‘full, objectively assessed need for market and affordable housing’ in their area. To create ‘sustainable, inclusive and mixed communities’ authorities should ensure affordable housing is provided.

⁷ The Climate Change Act 2008 sets targets for greenhouse gas (GHG) emission reductions through action in the UK of at least 80% by 2050, and reductions in CO₂ emissions of at least 26% by 2020, against a 1990 baseline.

Soil and contamination

- 6.2.12 The planning system prevent new or existing development from being ‘adversely affected’ by the presence of ‘unacceptable levels’ of soil pollution or land instability and be willing to remediate and mitigate ‘despoiled, degraded, derelict, contaminated and unstable land’ wherever appropriate.
- 6.2.13 Whilst there is no longer a national requirement to build at a minimum density, there is a need to ensure that effective and efficient use of available land is made when permitting residential development. Planning policies and decisions should ‘encourage effective use of land’ through the reuse of land which is previously developed, ‘provided that this is not of high environmental value’.

Town centre vitality

- 6.2.14 The NPPF promotes competitive town centre environments and encourages positive planning policies to support them. The need to enhance and retain markets is also outlined. Edge of town developments should only be considered where they have good access. This should be followed with an impact assessment to ensure the town centre remains viable in the long term.

Transport and accessibility

- 6.2.15 Planning for transport and travel will have an important role in ‘contributing to wider sustainability and health objectives’. To minimise journey lengths for employment, shopping, leisure and other activities, planning policies should aim for ‘a balance of land uses’. Wherever practical, key facilities should be located within walking distance of most properties.

6.3 Supplementing the NPPF

Waltham Forest ‘Working Together’ Community Strategy (2012)

- 6.3.1 In order to achieve the vision of the strategy the Local Strategic Partnership will seek to:
- Decrease crime and improve the safety and quality of the environment
 - Improve the health and well-being of local people
 - Improve learning opportunities to help individuals achieve their potential
 - Improve the local economy and infrastructure
 - Increase community understanding and participation
 - Increase the number of schools with 20% or more pupils eligible for free school meals participating in the Waltham Forest Healthy Schools scheme from 21 to 56 by 2006.
 - Reduce the gap between infant mortality in Waltham Forest and the national average by 10% by 2010.
 - Reduce the under-18 conception rate by 50% by 2010 as part of a broader sexual health strategy.
 - Establish an integrated children’s service to improve the lives of disabled children and their families by September 2005.
 - Develop and implement a strategy to address worklessness, and reduce the gap between the Borough’s unemployment rate and that of each of the Neighbourhood Renewal wards
 - Support emerging dynamic sectors of growth and innovation, such as green and creative industries, and encourage information technology and research, and the development of business intelligence in London.

- Sustain and promote the rapid expansion of leisure and cultural industries that are both key to London's economy and are the most rapidly expanding sectors of its population's expenditure.

[The London Plan: A spatial development strategy for Greater London \(2008\)](#)

6.3.2

The London Plan sets out a number of objectives that will contribute towards making London a better city for people to live in. These include to:

- Improve the quality of Londoners' lives and the environment through better designed buildings and public spaces.
- Address the differing needs of London's diverse population.
- Provide the spatial framework for the Mayor's Culture Strategy and enhance the cultural assets of London, encourage development of new facilities in new areas, building upon racial and cultural differences that reinforce London's diversity.
- Improve the availability of quality local services particularly education and health.
- Strengthen the diversity of London's economy, provide for small and ethnic minority businesses and encourage local enterprise, including social enterprise, throughout London.
- Support emerging dynamic sectors of growth and innovation, such as green and creative industries, and encourage information technology and research, and the development of business intelligence in London.
- Sustain and promote the rapid expansion of leisure and cultural industries that are both key to London's economy and are the most rapidly expanding sectors of its population's expenditure.
- Improve and expand London's public transport through increased and phased investment in services and infrastructure
- Integrate development with public transport to ensure that there is a proper fit between development and the capacity of the public transport network to service it over the period on the plan, taking appropriate opportunities to intensify the use of land where current or future transport capacity allows and to connect Londoners to employment opportunities.
- Tackle congestion through levels of restraint of car use appropriate to different parts of London and the provision of alternatives, including the improvement of access on foot and cycling and better and safer facilities for pedestrians and cyclists.
- Achieve targets for new housing, including affordable housing, that will cater for the needs of London's existing and future population and give more people who need it access to homes they can afford.

7 WHAT'S THE SUSTAINABILITY 'BASELINE' AT THE CURRENT TIME?

The SA Report must include...

- The relevant aspects of the current state of the environment
- The environmental characteristics of areas likely to be significantly affected

7.1 Introduction

7.1.1 Another important step when seeking to establish the appropriate 'scope' of an SA involves reviewing the situation now for a range of sustainability issues. Doing so helps to enable identification of those key sustainability issues that should be a particular focus of the appraisal, and also helps to provide 'benchmarks' for the appraisal of significant effects.

7.1.2 A review of the sustainability baseline is presented below.

Air quality

7.1.3 The entire Borough has been declared an Air Quality Management Area (AQMA) as a result of high levels of NO₂ and PM₁₀. Although background locations achieved the target concentrations for NO₂ in 2005 the annual average objective of 40µg/m₃ at roadside locations has yet to be achieved.

Biodiversity and open space

7.1.4 Waltham Forest contains two sites of international importance for nature conservation:

- Lea Valley – designated Special Protection Area (SPA) and Ramsar
- Epping Forest – designated Special Area for Conservation (SAC)

7.1.5 There are also four Sites of Special Scientific Interest within the Borough, which are: Chingford Reservoirs; Epping Forest (constituent SSSI of Epping Forest SAC); Walthamstow Marshes; and Walthamstow Reservoirs (constituent SSSI of Lea Valley SPA)

7.1.6 Important habitats in Waltham Forest, as identified in the Waltham Forest Biodiversity Action Plan, include:

- Acid Grasslands Habitat
- Churchyard and Cemeteries
- Floodplain Grassland, Marsh and Reed Bed Habitat
- Gardens and Allotments Habitat
- Grasslands, Meadows and Pastures Habitat
- Hedgerows and Green Lanes Habitat
- Woodland and Urban Forest Habitat
- Wood Pasture Habitat
- Rivers and Streams Habitat
- Parks, Open Spaces and Brownfield Sites Habitat
- Open Water Biodiversity

Climate change

- 7.1.7 Emissions of carbon expressed as ‘per capita’ (per residents) allow a comparison across areas. Per capita CO₂ emissions for Waltham Forest are significantly below those for the UK as a whole and are less than those for the Greater London area.

Community: Health, Crime and Social Equity

- 7.1.8 In terms of the overall measure of multiple deprivation (IMD 2010), Waltham Forest ranks 15th most deprived among the 326 local authorities in England. Its position has declined from 26th in 2007.

- 7.1.9 Some of the more deprived communities in London live in the Blackhorse Lane area, and pockets of poor environmental quality and underused industrial land reduce the quality of life for local residents. There are few facilities to serve the needs of residents and businesses, and a lack of publicly accessible open space. However, despite these issues, the area has considerable potential:

- In recent years some new residential developments have been secured, whilst an existing business community provides a range of job opportunities including in traditional manufacturing and emerging ‘creative’ sectors (e.g. music recording and productions, printers, graphic designers, community artists, software development and craftsmanship).
- Recognising the major asset of the Lee Valley Regional Park, the Walthamstow Wetlands project has recently been set up with the aim improving access to these existing open spaces for local communities and regional visitors.
- The area benefits from an important transport hub at Blackhorse Road Station, providing convenient access to the Victoria Line and overground Barking to Gospel Oak rail services.
- The community can also benefit from major regeneration projects nearby in Tottenham Hale, Walthamstow Town Centre, and Stratford.

Cultural heritage

- 7.1.10 In Waltham Forest there are 104 Statutory Listed Buildings (12 x Grade 2*, 92 x Grade 2), of which six are on the English Heritage Buildings at Risk Register. The Council has produced a ‘local list’ of buildings, which do not have the same statutory protection, but which the Council will seek to conserve and enhance as much as possible; there are 141 Locally Listed Buildings.

- 7.1.11 The following areas have been designated as Conservation Areas:

- The Green, Chingford
- Ropers Avenue/Inks Green, Highams Park
- Woodford Green
- Leucha Road, Walthamstow
- Walthamstow St. James
- St Mary’s Church (Walthamstow Village)
- Forest School
- Orford Road/Eden Road/ Grosvenor Park Road, Walthamstow
- Whipps Cross Road/Forest Glade, Leytonstone
- Browning Road, Leytonstone
- Thornhill Road, Leyton

- 7.1.12 In addition to the Higham's Estate, Chingford is designated as an Area of Special Character.
- 7.1.13 Blackhorse Lane has a diverse character, which can be split into distinct zones. Much of the character of the urban area is linked to its industrial heritage, which can be traced back to the early stages of Walthamstow's growth and is relevant both locally and within the wider context of manufacturing in the Upper Lee Valley. The existing area is defined as much by its industrial character as by its residential neighbourhoods.
- 7.1.14 The main industrial and commercial areas are located along the western boundary of the area adjacent to large expanses of reservoirs and open space. Additional industrial and commercial uses are also located to the east of Blackhorse Lane at Sutherland Road. Residential areas to the east and south comprise of predominantly two-storey Victorian terraces fronting a typical grid-based, connected network of streets, with later inter-war and 20th century housing development concentrated more towards the north and west of the area. Recent residential development constructed at Papermill Place and Unity Works in Sutherland Road comprises a more contemporary architectural approach.

Economy & employment

- 7.1.15 73.1% of residents in the Borough are economically active (June 2012). This figure is lower than the London average (75%) and the National average (76.6%)⁸. The unemployment rate has risen since the preparation of the 2008 Scoping Report, with the figure in Waltham Forest rising from 6.5% to 11.8% over that time. This is proportionally much higher than the London figure which has risen from 7.3% to 9.2%⁹. Earnings by resident (£540) are lower than the rest of London (£610), but are above the National average (£503)¹⁰.
- 7.1.16 In 2005 there were 1110 new start-up businesses in Waltham Forest. By 2010 only 35.6% of these had survived, lower than both the London average (39.7%) and the Great Britain average (44.2%)¹¹.

Education

- 7.1.17 There has been a marked improvement in educational attainment for Waltham Forest in recent years. The number of people with 'no qualifications' has reduced from 17.4% to 11.3% and the number of people with 'level 4 and above' qualifications has risen from 25.8% to 38.6%. These results however are still below that of London at all levels (NVQ1-4), and below the National average for all qualifications except NVQ4 and above¹².
- 7.1.18 Results at A Level / Key Stage 5 (pupils aged 16 to 18) are also lower in Waltham Forest than they are in England and London. For 2011, the average point score per pupil in Waltham Forest is 691 compared to 745.9 for England and 712.8 for London. Since 2007 the average point score per pupil in Waltham Forest has risen from 643.4 to 691 however¹³.

Housing

- 7.1.19 In 2011, 78% of dwellings were in private sector ownership (owner occupied or private rented), with social housing accounting for 22% of dwellings. Roughly 50% of social housing belongs to the local authority, with the other half being let Registered Social Landlords (RSL).

⁸ Nomis web ONS (2012)

⁹ Ibid.

¹⁰ ONS annual survey (2011)

¹¹ Business Demography ONS (2010)

¹² Nomis web ONS (2012)

¹³ Department for Education Performance Tables 2011

- 7.1.20 Between 2004 and 2009 home ownership fell from 60% to 49% in Waltham Forest¹⁴. The average house price in Waltham Forest in September 2012 was £256,029. This is an decrease on the 2008 figure, which was £271,517.¹⁵

Landscape and townscape

- 7.1.21 Waltham Forest is an urban area which contains areas of Metropolitan Green Belt and Metropolitan Open Land. In addition to these areas there are a large number of other open spaces in the Borough such as parks, playing fields and allotments. These areas of open space make an important contribution to the landscape and townscape of the Borough. The Borough contains approximately 780 acres of parks and green spaces, much of which is managed by the Borough and provides an opportunity for residents to come into contact with the natural heritage.
- 7.1.22 In terms of the built environment Waltham Forest comprises several 'Conservation Areas'. These areas have been identified as making an important contribution to local distinctiveness and historic character. In relation to new development in the built environment the Council raises awareness of, and rewards, good quality design through annual Design Awards.

Transport and accessibility

- 7.1.23 The public transport network consists principally of two railway services, two underground services and a large network of bus and night bus services. The Chingford to Liverpool Street Line is a radial rail line that forms a main commuter route to Central London. The Barking to Gospel Oak Line (GOBLIN) is an outer London orbital rail route that has recently been taken over by TfL as part of the London Overground network. The London Underground Central Line serves the south of the Borough whilst the Victoria Line runs to Walthamstow Central and serves the middle of the Borough.
- 7.1.24 The Borough is well served by buses, with the network centred on the recently modernised Walthamstow Bus Station which is now the third busiest bus station in London. In total there are 37 bus routes serving the borough, including six night bus routes. The Council is working with TfL London Buses on the possible extension of several routes and new initiatives, including third generation bus priority.
- 7.1.25 Provision for cyclists within the Borough is good with on road cycle lanes covering 32km of main roads and 32km of quiet cycle routes on residential roads and through parkland and forest. Secure cycle parking is provided at three underground stations within the Borough, namely Walthamstow Central, Leytonstone and Leyton, and at other key locations such as leisure centres. Cycle training is also offered free to all adults living, working or studying in the Borough. In addition, cycle parking facilities are required as part of all new developments.

¹⁴ GLA, / 2011 Waltham Forest Housing Needs survey and Strategic Housing market assessment

¹⁵ Lang Registry

8 WHAT'S THE BASELINE PROJECTION?

The SA Report must include...

- The likely evolution of the current state of the environment without implementation of the plan

8.1.1 Just as it is important for the scope of SA to be informed by an understanding of current baseline conditions, it is also important to ensure that thought is given to how baseline conditions might 'evolve' in the future under the 'no plan' / 'business as usual' scenario. Doing so helps to enable identification of those key sustainability issues that should be a particular focus of the appraisal, and also helps to provide 'benchmarks' for the appraisal of significant effects.

8.1.2 The following bullets list a range of 'future baseline' issues that should be a focus of SA and provide benchmarks for the identification of significant plan effects:

- The large percentage of under 45s in the inner catchment area and the rising unemployment rate seen from 2008 is likely to continue to without the provision of new employment sites. The current 73% of economically active adults could become a smaller figure in the future.
- The population of Waltham Forest is expected to increase although the increases are expected to be less than the increases for London and Outer London. There would be an increased demand on the provision of services and facilities, and on housing as a consequence of this increase.
- Without provision of new homes and employment sites through the AAP, Waltham Forest would see an ageing population. An ageing population will require a wider range of services within easily accessible distance and transport mode of their homes. The provision and improvement of public transport is therefore an important sustainability issue.
- Without the AAP policies, applications for new development would still come forward, but there would be less certainty that these would be sustainable and viable, and this could lead to uncertainty and delayed provision of important infrastructure (e.g. pedestrian and cycle access routes and other sustainable transport measures). Reduced rates of development could mean that environmental impacts of development are avoided, however continued car dependency would result in continued air pollution and greenhouse gas emissions at unsustainable levels.
- Pedestrians and cyclists are top of the Council's hierarchy of road users, with the Council considering walking and cycling to be excellent modes of transport for trips of up to 2km and 5km respectively and for linking up other modes of transport. The Council is currently preparing a Walking Strategy for the Borough with the aim of identifying measures to increase the level and number of people walking. Street lighting and traffic calming measures are also implemented as required which benefit pedestrians and other road users.
- There is an identified shortfall between house prices and the potential mortgages that could be obtained by those earning an average salary. This means that it is becoming increasingly difficult for those on lower incomes to purchase a property and it is unlikely that the current situation will change, especially given that the unemployment rate rising also.
- Waltham Forest ranks as the 15th most deprived out of 326 local authorities nationally. This represents an increase in relative deprivation from 2007. Without the AAP it can be assumed that problems will continue. For example, crime could continue to be an issue and vacant buildings could contribute to a worsening image.

9 WHAT ARE THE KEY ISSUES THAT SHOULD BE A FOCUS OF THE APPRAISAL?

The SA Report must include...

- Any existing environmental problems which are relevant to the plan

9.1 Introduction

9.1.1 Drawing on the review of the sustainability context and baseline, the 2008 SA Scoping Report was able to identify a range of sustainability objectives and issues that should provide a methodological framework for the appraisal, ensuring it remains focused. These are listed below:¹⁶

9.2 Sustainability objectives

1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings
2. Reduce crime and the fear of crime
3. Improve standard of health and wellbeing of those who live and work in the borough
4. Increase the provision of and access to community facilities to meet local cultural, recreational and social needs
5. Improve educational attainment in schools
6. Improve opportunities for access to education and training for all residents
7. Reduce the overall level of deprivation
8. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system
9. Reduce production of waste and increase recycling
10. Reduce greenhouse gas emissions
11. Conserve energy
12. Improve air quality through a reduction in traffic-based emissions
13. Improve water quality and ensure the efficient use of water resources
14. Reduce the risk of flooding
15. Reduce contamination and safeguard soil quality and quantity
16. Make the best use of previously developed land (PDL) and existing buildings
17. Conserve and enhance biodiversity
18. Protect the ecological integrity of Natura 2000 sites
19. Maintain and enhance the quality of the green belt and open space areas.
20. Conserve and, where appropriate, enhance the historic environment
21. Maintain and enhance the vitality and viability of the borough's town centres
22. Improve the local economy by attracting inward investment
23. Maintain stable levels of employment in the borough

¹⁶ The Scoping Report contains a more detailed discussion of the key issues.

9.3 Sustainability Issues

Air

- Air pollution from the strategic road network is an issue across the Borough and, more recently, is affecting background locations.

Biodiversity

- Parts of Epping Forest are in an 'unfavourable' or 'unfavourable/declining' condition.

Crime and safety

- Crime levels are generally higher in Waltham Forest than nationally.

Economy

- Low levels of economic growth in the Borough.
- Declining industrial sectors and under-representation of growth sectors.

Employment and Skills

- Average salaries for those working in Waltham Forest are lower than average salaries for those living in the Borough. This disparity could affect the Borough's ability to attract inward investment.
- Unemployment levels are higher than the average for Great Britain.
- Educational attainment is relatively low and a high proportion have no qualifications.

Housing

- There is a disparity between the cost of housing and the amount that people are able to borrow to purchase a home, which prevents access to the property market.
- There is a potential shortfall in the provision of family accommodation.
- There is a shortfall of affordable housing to meet the requirements of those in housing need.

Human Health

- Life expectancy is lower than the average for London and the rest of the country.
- Health inequalities for Black and Minority Ethnic groups.
- The southern part of the Borough is subject to higher levels of poor health, which has been associated with deprivation, poverty and overcrowding.

Landscape and Townscape

- Development pressure could lead to the loss of open space or recreation facilities.

Transport

- Reliance on the private car as the main mode of transport, contributing to air pollution, greenhouse gas emissions and congestion.
- Increasing car ownership, personal wealth and population is expected to place further demands on the local transport network leading to increased congestion.
- Expansion of the transport network could require significant land-take.

Waste

- The amount of waste produced per person is not decreasing over time.
- Although levels of recycling are increasing over time the proportion of waste recycled is not yet meeting Government targets.

PART 2: WHAT HAS PLAN-MAKING / SA INVOLVED UP TO THIS POINT?

10 INTRODUCTION (TO PART 2)

The SA Report must include...

- An outline of the reasons for selecting the alternatives dealt with
- The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting preferred alternatives / a description of how environmental objectives and considerations are reflected in the draft plan

10.1.1 The ‘story’ of plan-making / SA up to this point is told within this Part of the SA Report. Specifically, this Part of the SA Report describes how:

- As an interim plan-making / SA step there was an appraisal of **alternative approaches to addressing a range of area-wide policy issues**;
 - and how the Council then took account of these interim SA findings when preparing the Proposed Submission version of the AAP.
- As an interim plan-making / SA step there was an appraisal of **alternative approaches to developing ‘Opportunity Sites’**;
 - and how the Council then took account of these interim SA findings when preparing the Proposed Submission version of the AAP.
- As an interim plan-making / SA step there was an appraisal of a ‘working draft’ plan, i.e. the approach presented within the August 2011 **‘Preferred Options’** consultation document;
 - and how the Council then took account of these interim SA findings when preparing the Proposed Submission version of the AAP.

11 ALTERNATIVE APPROACHES TO ADDRESSING AREA-WIDE POLICY ISSUES

11.1.1 This Chapter presents a consideration of alternatives for the following AAP policy issues:

- | | |
|------------------------------|---|
| • Housing density | • Public open space and nature conservation |
| • Affordable housing | • Flood risk |
| • Employment | • Transport |
| • Neighbourhood centre | • Social infrastructure |
| • Design and local character | |

11.1.2 For each issue this Chapter summarises the interim SA findings that were fed-back to the Council¹⁷; and also explains the degree to which these findings are reflected in the Council’s preferred approach as set out within the Proposed Submission AAP document.

11.2 Housing density

Alternatives considered

1. High density, with a broad mix of unit sizes
2. A mix of densities aimed at different markets

¹⁷ These findings and recommendations were presented within the Interim SA Report published for consultation alongside the Blackhorse Lane AAP Preferred Options document (August 2011).

Summary of appraisal findings

11.2.1 (2) performs well in terms of sustainability objectives, particularly because targeting high density housing to areas of high public transport accessibility would support a shift to more sustainable patterns of travel. A mixture of densities is also important from a well-being perspective, given that higher density developments can lead to greater pressures on residential amenity and private and community space.

11.2.2 **Appendix II** presents interim appraisal findings in full.

The Council’s preferred approach

11.2.3 Policy BHL3 of the Proposed Submission document aims to secure a mix of housing densities across the plan area that recognises opportunities for sustainable living at higher densities in areas with the greatest accessibility and provision of shops and services. Meanwhile, policy BHL4 outlines requirements for a mix of household sizes in the interests of a mixed and inclusive community; with scope for a higher proportion of well-designed 1 and 2 bedroom units at the Station Hub, and larger, more family orientated units in more peripheral locations.

11.3 Affordable housing

Alternatives considered

1. Maximise on site affordable housing
2. Focus on providing a mixed community

Summary of appraisal findings

11.3.1 (2) performs well from a sustainability perspective as it would ensure that ‘new development’ (and we assume the recent developments at Paper Mill Place and Unity Works to be a part of this) includes at least 50% affordable housing. The alternative approach (1) would lead to a dominance of affordable housing in these areas, which could lead to unbalanced communities over time.

11.3.2 **Appendix III** presents interim appraisal findings in full.

The Council’s preferred approach

11.3.3 Policy BHL5 of the Proposed Submission document seeks to secure a mixed community through citing borough wide policies in terms of the percentage of affordable homes, and unit size and tenure in new developments. At the time of the Preferred Options document, there was concern that an over-concentration of affordable units was emerging in Sutherland Road. However, since this time, the impact of viability on new schemes ability to provide high levels of affordable housing has removed this issue.

11.4 Employment options

Alternatives considered

1. Protect existing businesses
2. Incorporate new employment as part of mixed use developments
3. Distinct zones

Summary of appraisal findings

- 11.4.1 Existing industries will perform an important employment function, and it will be important to ensure that sectors of the community that rely on these businesses are not left unable to access suitable employment as a result of the AAP. However, an approach focused on protecting existing businesses (1) would conflict with the objective to deliver a large amount of new housing (which itself is of key importance to the achievement of regeneration aims), given that existing businesses are often not compatible with residential uses.
- 11.4.2 Refocusing on mixed-use developments with B1 uses (2) would lead to a greater number of employment opportunities locally (i.e. it would be possible to support more jobs per m² of employment floorspace) and it is expected that a mixture of small business would also ensure that local employment is resilient (where as manufacturing is more likely to decline). Another important consideration is that mixed use development will be supportive of efforts to incorporate district heating.
- 11.4.3 Approach (3) could perform well, but it is not possible to draw conclusions on the sustainability merits of this approach without knowing more about the approach to zoning that would be implemented.
- 11.4.4 **Appendix IV** presents interim appraisal findings in full.

The Council's preferred approach

- 11.4.5 Policy BHL6 of the Proposed Submission document sets out a balanced approach that seeks to protect valued existing businesses, directs employment functions incompatible with residential to land designated as SIL, and encourages new B1 business space as part of mixed use developments. Such an approach aims to ensure that whilst an efficient use of land is secured and new fit for quality business space is provided for emerging sectors, the industrial heritage of the area is also respected and fostered through regeneration activities.

11.5 Neighbourhood centre

Alternatives considered

1. Offer guidance on appropriate uses and sizes
2. A flexible approach to town centre uses

Summary of appraisal findings

- 11.5.1 Option (1) would help to ensure that the Neighbourhood Centre does not have any unforeseen negative sustainability effects. In particular, it would be possible to ensure that the retail and leisure offer does not conflict with that of Walthamstow Town Centre. A hierarchy of centres is important from a perspective of minimising the need to travel, ensuring that day to day needs are available within walking distance and comparison shopping can be undertaken in centres that are accessible by public transport. Alternative (1) would also be supportive of efforts to maximise the 'wider-benefits' of a neighbourhood centre. In particular, it would likely ensure that a mix of uses comes forward that supports the development of a 'hub of activity'.
- 11.5.2 It might be suggested that the approach suggested through Alternative (1) could constrain investment. However, it is not likely that this effect will be significant, given that a broad range of uses will be permitted.
- 11.5.3 Regarding (2), this approach essentially represents 'business as usual', and hence it is the case that the opportunities for sustainability benefits (as described above) would be missed.
- 11.5.4 **Appendix V** presents interim appraisal findings in full.

The Council's preferred approach

- 11.5.5 Policy BHL7 of the Proposed Submission document sets out guidance on appropriate uses and scale of commercial development in the neighbourhood centre, and clearly defines the boundaries of the centre. This will help secure a hub of activity that is conveniently located close to the areas of highest development density and likely footfall that also compliments the existing retail parade and is not of a scale likely to result in leakage from other centres. It also includes cross references to relevant policies elsewhere in the Local Plan for the management of other existing Local Retail Parades in the AAP area with a view to ensuring that these effectively meet the needs of communities not likely to be served by the neighbourhood centre.

11.6 Design and local character

Alternatives considered

1. Create a new character
2. Incorporate existing buildings of merit

Summary of appraisal findings

- 11.6.1 Creating a new character for the Blackhorse Lane area (1) would make it possible to better capitalise on locational opportunities. In particular, it would be possible to better capitalise on the proximity to the Lee Valley Regional Park and Walthamstow Marshes. Through development, it would be possible to further develop the 'natural signature' of the area. It would also be possible to capitalise on opportunities for supporting greater walking, cycling and use of public transport.
- 11.6.2 In addition, 'Creating a new character' would help to address some existing local problems. In particular, the built-up area is quite 'grey', without well integrated greenspace. Improving the built environment and the public realm would likely result in a general improvement to the image of the area. It is not expected that (1) would have any significant negative effects in terms of SA objectives.
- 11.6.3 Approach (2) does also have merit, given that a number of existing buildings in the area do make a positive contribution to local character. Existing buildings can provide a useful link to the past that gives an area its unique sense of place and identity.
- 11.6.4 **Appendix VI** presents interim appraisal findings in full.

The Council's preferred approach

- 11.6.5 Policy BHL8 in the Proposed Submission document recognises that there is merit in both approaches described above. It aims to strike a balance between using new development to realise opportunities to enhance local character and public realm, whilst also respecting the positive features of the existing urban grain and incorporating existing buildings of merit where viable.

11.7 Public open space and nature conservation

Alternatives considered

1. Create new open spaces
2. Improve access to existing open spaces
3. An integrated approach

Summary of appraisal findings

- 11.7.1 Walthamstow Wetlands are an exceptional and extensive blue/green asset. Therefore, the local population would benefit greatly from increased access (2), particularly in terms of ‘health and wellbeing’. It is also likely that access to these important natural assets would add to local sense of place and heritage. Capitalising on these important local assets would help to attract residents and businesses.
- 11.7.2 By increasing access to existing open spaces (2) there would be the potential for increased recreational disturbance to sensitive habitats and wildlife. However, this effect is uncertain, and it is likely that any potential effects would be avoided or sufficiently mitigated.
- 11.7.3 An approach focused on creating new open spaces (1) would also have a positive effect, but benefits would possibly not be of the same magnitude due to the likely difficulties in creating habitat that is of the same quality as the Walthamstow Wetlands. A particular benefit of (1) is that it would potentially help to reduce the ‘urban heat island’ effect. New open spaces can also provide a buffer between sources of pollution and sensitive receptors.
- 11.7.4 An approach that seeks to deliver both increased access and the new open space within the built-up area (3) would most likely avoid any risk of recreational disturbance.
- 11.7.5 **Appendix VII** presents interim appraisal findings in full.

The Council’s preferred approach

- 11.7.6 Policies BHL9 and BHL10 of the Proposed Submission document set out an integrated approach that aims to improve public access to Walthamstow Wetlands and the Lee Valley Regional Park due to the massive gains that can be had for local communities and the wider visitor economy, but also complimenting this through new open spaces within developments. This will help signal a better visual and physical relationship to these major assets; helping ensure future developments do not ‘turn their back on them’ (in the manner of past developments).

11.8 Flood risk

Alternatives considered

1. Avoid new development in flood risk areas
2. Only less vulnerable uses should be allowed in flood risk areas
3. New developments should be seen as an opportunity to minimise existing flood risk

Summary of appraisal findings

- 11.8.1 All options could effectively avoid flood risk. However, (1) and (2) would restrict development, and so could potentially hinder the regeneration of the Blackhorse Lane Area.
- 11.8.2 **Appendix VIII** presents interim appraisal findings in full.

The Council’s preferred approach

- 11.8.3 Policy BHL11 of the Proposed Submission document seeks to ensure that: 1) existing flood risk in the area does not blight development opportunities that can bring major regeneration benefits; and 2) the design and siting of new developments minimises risk to both existing and new communities including through capitalising on opportunities to reduce the level of hardstanding in the area and increase use of SuDs.

11.9 Transport

Alternatives considered

1. Predict and provide for road traffic.
2. Prioritise sustainable transport

Summary of appraisal findings

- 11.9.1 One of the major strengths of the area is its transport links. However, there is the potential to further capitalise on this strength. (2) seeks to achieve this by supporting walking and cycling and priority bus routes. Reducing travel by private car would result in benefits in terms of several sustainability objectives. Furthermore, encouraging walking and cycling can have health benefits for resident's and also improve road safety.
- 11.9.2 It might be suggested that hindering access to the area by private car (2) could have negative effects on local businesses. However, in the long term the effects would likely be beneficial given that, without measures to curb car use (1), traffic congestion would worsen over time.
- 11.9.3 **Appendix IX** presents interim appraisal findings in full.

The Council's preferred approach

- 11.9.4 Policy BHL12 of the Proposed Submission document aims to prioritise sustainable transport due to its comparative benefits over providing for a growth in car use; in terms of an improved public realm, minimising pollution, and potential health benefits for the local population. It also recognises that providing interventions for a growth in car use historically lead to further increases in car use; meaning congestion problems persist.

11.10 Social infrastructure

Alternatives considered

1. Aim to provide all forms of social infrastructure
2. Prioritise new education and health facilities

Summary of appraisal findings

- 11.10.1 Good access to social infrastructure will be of central importance to effective regeneration. (1) aims to provide all forms of social infrastructure. However, there is a risk that the cost of this provision could deter new development, and hence hinder regeneration with wide ranging sustainability implications. (2) draws on evidence to identify new education and health facilities as social infrastructure priorities.
- 11.10.2 **Appendix X** presents interim appraisal findings in full.

The Council's preferred approach

- 11.10.3 Policy BHL14 of the Proposed Submission document outlines plans for new social infrastructure in the AAP area, which reflects the need to prioritise education and health as key requirements of a sustainable pattern of development, whilst also providing built and open spaces that will help foster a sense of community (through increased opportunities for social interaction).

12 ALTERNATIVE APPROACHES TO DEVELOPING 'OPPORTUNITY SITES'

- 12.1.1 The Proposed Submission Plan identifies aspirations for thirteen 'Opportunity Sites' within the AAP area. The plan document explains how these sites were identified, and also lists sites that were 'put forward' but subsequently discounted. Essentially, the thirteen Opportunity Sites were identified on the basis that they are likely to be deliverable over the plan period, do not compromise strategic policies (e.g. in relation to the protection of designated greenspace, Metropolitan Open Land, Green Belt, and Strategic Industrial Land), and can bring significant regeneration benefits to the area.
- 12.1.2 For each site, prior to preparing the draft plan, there was the need for the Council to determine an appropriate 'aspiration' for each site and, more specifically, develop policy with a view to helping to ensure that the aspiration is realised. Given the importance of these decisions, it was determined that for ten¹⁸ of the Opportunity Sites there was a need to give consideration to alternative approaches as an interim plan-making / SA step.
- 12.1.3 For each Opportunity Site, this Chapter summarises the interim SA findings that were fed-back to the Council; and also explains the degree to which these findings are reflected in the Council's preferred approach as set out within the Proposed Submission AAP document.

12.2 Station Hub and Waterfront Site (BHL1)

Alternatives considered

1. Mixed use development incorporating 1000 residential units, 4550m² commercial space (including retail, B1 business space and social infrastructure), linear park and public open spaces.
2. Retain existing industrial uses.
3. Mixed use incorporating a new waterfront park with high density residential overlooking, retail along Forest Road frontage, and a new road through the site linking Forest Road to Priestley Way.

Summary of appraisal findings

- 12.2.1 Options 1 and 3 propose housing development which would contribute to the AAP's housing targets and would therefore help to address local housing need. Option 1 has the additional advantage of creating a mix of uses including social infrastructure. While Option 3 is likely to have a number of positive effects on sustainability objectives, the construction of a new road running through the site would have negative effects in terms of air quality, human health and transport related objectives. By maintaining the status quo, Option 2 would not create an efficient use of the site and would be unlikely to result in many positive effects in terms of sustainability objectives.
- 12.2.2 **Appendix XI** presents interim appraisal findings in full.

¹⁸ The 'Former Essex Arms Public House Site (BHL9) is now developed, and hence there is less need to provide policy guidance through the AAP; hence alternative approaches have not been considered. For the 'Marine Engine House Site (BHL10) and Old Coppermill Site (BHL11) alternatives have not been considered on the basis that the policy approach presented within the Proposed Submission Document is to a large extent pre-determined given the need for the AAP to be in-line with aspirations set through the Walthamstow Wetlands project.

The Council's preferred approach

12.2.3 **Option 1** is the Council's preferred approach. **Option 2** is discounted as it fails to make an efficient use of land given proximity to Blackhorse Road Station, and does not enable community benefits in terms of new convenience shopping or improved access to Walthamstow Wetlands and the Lee Valley Regional Park. **Option 3** is discounted as it means that physical and visual links to Walthamstow Wetlands are restricted to occupiers of premium development plots rather than benefitting the wider community. Retail along Forest Road frontage would not capitalise on major footfall increases along Blackhorse Lane as a result of growth in the Sutherland Road area, or complement existing local retail parade in this area. A new road would encourage car trips through the site and undermine opportunities for an attractive public realm.

12.3 Car Wash and Garage Site (BHL2 North)

Alternatives considered

1. Mixed use with ground floor commercial units and/or social infrastructure (approximately 1500 m²) with approximately 50 residential units above.
2. Retain as existing
3. 100% residential

Summary of appraisal findings

12.3.1 Option 1 would intensify and make good use of the site which is currently underutilised. Options 1 and 2 both propose housing which would contribute to the housing targets for the area, which would help to address local housing need. Option 1 proposes the creation of small retail and business uses which would help to support the creation of a new neighbourhood centre. Option 2 would result in the continued inefficient use of this prominent site. While likely to have some positive effects, Option 3 would be likely to result in some negative effects in terms of air quality due to the creation of housing at ground floor level.

12.3.2 **Appendix XII** presents interim appraisal findings in full.

The Council's preferred approach

12.3.3 **Option 1** is the Council's preferred approach. **Option 2** is discounted as the current layout provides an inefficient use of land given prominent location on a major gateway into the borough, and proximity to Walthamstow Wetlands and Blackhorse Road station. **Option 3** is discounted as the location of the site between a major A road (Forest Road) and the Gospel Oak- Barking railway line means noise and air quality are potential constraints to residential development on the ground floor. Furthermore, a mixed use scheme can help increase job opportunities locally through the provision of new commercial space, and also enhance opportunities for increased active frontages at this prominent location.

12.4 Blackhorse Road/ Hawarden Road Site (BHL2 South)

Alternatives considered

1. Secondary school
2. High density residential

Summary of appraisal findings

12.4.1 Both options would make more efficient use of the land by bringing the site back into use. Option 1 would have the benefit of providing an education facility for local children in a location that benefits from good public transport provision. Option 2 would contribute to housing targets and therefore help to address local housing need in a well-connected location. However due to the limited number of sites within the Council's ownership that would be suitable for housing a new secondary school, Option 2 could potentially result in the demand for a new school in a well-connected location not being met.

12.4.2 **Appendix XIII** presents interim appraisal findings in full.

The Council's preferred approach

12.4.3 **Option 1** is the Council's preferred approach. **Option 2** is discounted as there is a pressing need for new education facilities in the area; both to cater for existing demand, and anticipated levels of growth. Given the Council's limited land holdings in the plan area, development of this site for alternative uses would mean demand for this important aspect of social infrastructure could not be met. Furthermore, additional residential development on this site would result in an increased demand for school places.

12.5 Willowfields School Site (BHL3)

Alternatives considered

1. Primary school
2. Retain as secondary school.
3. Redevelop for residential.

Summary of appraisal findings

12.5.1 Option 1 would maintain an education use on the site but would result in the creation of a primary school to meet the demands for primary school places from residents in the surrounding area. Option 2 would not be an efficient use of the site as the school is already operating at capacity and is unable to offer opportunity for expansion. The housing led Option 3 would contribute to housing targets in the area and help address local housing need but would further increase pressure on schools in the area that are already operating at capacity.

12.5.2 **Appendix XIV** presents interim appraisal findings in full.

The Council's preferred approach

12.5.3 **Option 1** is the Council's preferred approach. **Option 2** is discounted as the school is currently operating at capacity and surrounding residential areas mean there is little scope for expansion. Retaining the status quo would mean increased demand through a growing population would not be adequately met in the Blackhorse Lane area. **Option 3** is discounted as demand for primary school places is projected to increase as a result of population growth, and existing schools in the Borough are already operating at capacity (including use of temporary buildings such as portacabins). As primary school students are expected to travel less to school the secondary students, it is important that space capacity is increased in Blackhorse Lane as one of the Borough's key growth areas. Redeveloping the site for residential would place increased pressure on schools already operating at capacity.

12.6 Sutherland Road Sites (BHL4 North, BHL5 and BHL6)

Alternatives considered

1. Separate uses proposed for each of the three sites. BHL4 North – Mixed use development including 150 residential units, 2000m² business space and health centre. BHL5 – Residential development of 323 units. BHL6 – Mixed use development including 235 residential units, 786m² B1 artisan workshops, 1099m² retail space, highway alterations, energy centre and new public realm works, landscaping and car parking.
2. Consolidating business uses into site BHL6 as a new business park and redeveloping BHL4 North and BHL5 for residential.

Summary of appraisal findings

12.6.1 Both options would have positive effects in terms of contributing to local housing need. Option 1 would result in the creation of a mix of uses across the three sites which would make a positive contribution in terms of enhancing the local area and would create a more efficient use of the land than the present situation. This option also has the advantage of protecting the traditional employment uses on the site that are considered compatible with residential use. Option 2 would lead to a 'zoning approach' to development which would not contribute to the creation of a mixed use community in the area. Although this option would lead to the creation of new employment opportunities through the development of a new business park, it would also result in the removal of a number of traditional workshops which are of some built heritage which in turn would result in the loss of jobs in the traditional industries.

12.6.2 **Appendix XV** presents interim appraisal findings in full.

The Council's preferred approach

12.6.3 **Option 1** is the Council's preferred approach. **Option 2** is discounted as it would involve the loss of Dunhills (an employer of skilled craftsmen) from the area and result in the removal of small traditional workshops that are of some built heritage and offer scope for refurbishment and re-use for creative industries. Given the types of business activities the Council wishes to attract to the area, such land use zoning is not considered necessary in terms of creating satisfactory residential amenity, and would undermine aspirations for a vibrant mixed used area.

12.7 Sutherland Road Site (BHL4 South)

Alternatives considered

1. Mixed use development including 2700m² B1 use, approximately 200 residential units above, and retained community uses
2. Retain existing buildings for employment use

Summary of appraisal findings

12.7.1 Option 1 proposes a significant shift away from existing industrial employment uses towards business uses for the creative industries. It would make better use of the land compared to Option 2 through creating new business space that would be more compatible with the surrounding residential uses and would lead to the creation of new community facilities in the area. The housing element of Option 1 would also have the benefit of contributing to housing targets and helping to address local housing need. However it may have some negative effects in terms of the employment objectives by reducing a small number of important local employment opportunities in the traditional industries. Option 2 would have the advantage of safeguarding existing employment in the traditional industries but would not result in the most efficient use of the land, it would not create new employment opportunities and would not help to address local housing need.

12.7.2 **Appendix XVI** presents interim appraisal findings in full.

The Council's preferred approach

12.7.3 **Option 1** is the Council's preferred approach. **Option 2** is discounted as existing buildings include a mix of dated 1-3 storey warehousing and office buildings that landowners have struggled to let, and subsequently provide a low level of employment. The existing layout of development contributes to poor pedestrian and cycle connections between existing residential communities to the east of Stirling Road and Blackhorse Road Station, the proposed new neighbourhood centre, and Walthamstow Wetlands.

12.8 Billet Works Site (BHL7)

Alternatives considered

1. Mixed use development including 344 residential units, retail, office and community space, car parking spaces, cycle provision and amenity space
2. High density mixed use development including 500+ new homes

Summary of appraisal findings

12.8.1 Both options proposed housing and would therefore contribute to the AAP's housing targets and help address local housing need. High density development (Option 2) is less appropriate to this site because of its relatively poor public transport accessibility.

12.8.2 **Appendix XVII** presents interim appraisal findings in full.

The Council's preferred approach

12.8.3 **Option 1** is the Council's preferred approach. **Option 2** is discounted as the site is less well served by public transport than others in the plan area and is surrounded by largely two storey development. Whilst there is scope for intensification, a scheme of such density would have difficulty successfully integrating into the existing built form and is considered inappropriate for a location that is less urban in nature than those closer to Blackhorse Road station.

12.9 152/154 Blackhorse Road Site (BHL8)

Alternatives considered

1. Mixed use development including ground floor commercial units, 40 residential units and potential social infrastructure
2. Retain as existing
3. 100% residential scheme

Summary of appraisal findings

12.9.1 Options 1 and 3 would both create an intensification of uses on this currently underutilised site. The mixed use approach of Option 1 would result in a greater diversification of uses on the site which should have a number of positive effects in terms of contributing to local housing need and providing new employment opportunities in the area. Option 3 would also contribute to local housing targets and help address local housing need but would result in the loss of employment in this part of Blackhorse Lane. By maintaining the status quo, Option 2 would not provide an efficient use of the site and would also not help to address local housing need.

12.9.2 **Appendix XVIII** presents interim appraisal findings in full.

The Council's preferred approach

12.9.3 **Option 1** is the Council's preferred approach. **Option 2** is discounted as existing layout provides an inefficient use of space, and unattractive design in a prominent location. The site has suffered from low levels of occupancy, and makes no contribution towards meeting local housing need. **Option 3** is discounted as a 100% housing scheme would fail to realise opportunities to secure new fit for purpose business units or space for social infrastructure. It would also hamper opportunities to provide strong active frontages at this prominent location.

13 PREFERRED OPTIONS

13.1.1 This Chapter summarises the interim SA findings that were fed-back to the Council in relation the early working draft plan approach as set out within the Council's August 2011 'Preferred Options' consultation document. The Council's response is also provided.

13.2 Summary of appraisal findings

Area-wide policy

13.2.1 The following is a summary of some of the key points raised (within the Interim SA Report published alongside the Council's Preferred Options consultation document) in relation to the Council's preferred approach to area-wide policy, as set out within the Preferred Options consultation document:

- Although there are clear benefits to promoting higher density development in the station area, there are also some question marks. In particular, it is important to note that this part of the AAP area is in close **proximity to the wetlands and reservoirs** to the west. It could be the case that higher density development in this location could lead to unacceptable recreational pressure on biodiversity. However, this effect is uncertain, and it is likely that any potential effects will be avoided or sufficiently mitigated (e.g. through careful management of access).
- It is also the case that the station area is relatively important (i.e. important in the local context) from a historical perspective. It could be the case that higher density development increases the chances that **historic character** is lost. However, again, this effect is uncertain. It is likely that impacts can be avoided through the careful integration of heritage features.
- It will be important to ensure that reducing the prominence of **traditional industries** does not impact significantly on sectors of the community that rely on these businesses.
 - It was **recommended** that the Council makes a clear statement regarding the employment prospects of those local residents employed in existing industries that will be not be supported as part of regeneration.
 - It was **recommended** that decisions on whether or not to incorporate existing

businesses should be made on the basis of the importance of that business and the jobs it supports to the local area, rather than purely on the basis of current ‘success’

- ‘Creating a new character’ could result in negative effects if it results in existing **character and links to the past** being entirely erased. It is not expected that this will be the case, given that the policy approach seeks to ensure that existing buildings in the area that make a positive contribution in this respect will be integrated as part of redevelopment. However, the emphasis on creating a new character for the area will mean that many buildings will not be retained.
- The only questionable effect of increasing access to Walthamstow Wetlands relates to the potential for increased **recreational disturbance to sensitive habitats** and wildlife (particularly wintering waterfowl). However, this effect is uncertain, particularly given that there will also be new open spaces created, which will themselves be used for recreational purposes. If there is any residual potential for impacts to the Walthamstow Wetlands, it is likely that effects can be avoided or sufficiently mitigated through careful management of access and other practical measures.
- It was **recommended** that the Council should provide further details on the approach to car free development.

Opportunity sites

13.2.2

The following is a summary of some of the key points raised (within the Interim SA Report published alongside the Council’s Preferred Options consultation document) in relation to the Council’s preferred approach to Opportunity Sites, as set out within the Preferred Options consultation document:

- The **‘Station Hub and Waterfront’** site is associated with some uncertainty in terms of effects to biodiversity given proximity to the Walthamstow Wetlands. It was also recommended that a firmer commitment could be made regarding the future of the Royal Standard Pub.
- The **‘Car Wash’** site is also associated with some uncertainty in terms of effects to biodiversity given proximity to the Walthamstow Wetlands.
- In relation to the **Blackhorse Rd / Hawarden Road** site, the interim SA noted that, because educational benefits will not be felt for some years (i.e. until the school is built), it is important to consider that benefits that might be derived in the shorter term from alternative uses of this site. This is particularly the case given that, as long as this site remains vacant it can be considered to detract from the overall image of the area. The potential for temporary uses was noted, and it was recommended that a policy approach be developed that provides certainty in terms of temporary uses.
- In relation to the **Sutherland Road** site, the interim SA concluded the following:
 - As a result of proposals for this site, existing industrial uses that are less compatible with nearby residential would be lost. This would result in the loss of important local employment. It is noted that ‘the primary employment function of the area’ would remain, but the focus would be on creative industries. Given that existing residents that rely on current employment uses would not be expected to take up the newly available jobs, it may be that some negative impacts could be expected in terms of access to local employment opportunities. However, newly created employment opportunities would be well suited to the skills and aspirations of residents that move into the area in the future. Furthermore, it is important to note that maintenance of the status quo (i.e. the maintenance of existing industrial uses) would impede residential development at a key location, which in turn would hinder the achievement of regeneration for the wider area.
 - It was recommended that the policy approach for this site should specify the degree to which it will be possible to make use of existing buildings in the area.

- In relation to both the **Billet Works** and **Webb's Industrial Estate** sites, the interim SA noted that some existing industrial uses would be lost; but concluded that the scale of this effect would *not* be such that there would be impacts in terms of access to suitable employment for existing local residents.

13.3 How have these interim SA findings been reflected?

Area-wide policy

- In terms of unacceptable recreational pressure on biodiversity, reference is made in the Proposed Submission version of the AAP for the need to mitigate such effects and incorporate measures to enhance biodiversity as part of development. Greater reference is also made to the Walthamstow Wetlands project, including references to managed access, screening sensitive areas, potentially closing pathways during breeding cycles, and habitat enhancement works.
- In terms of heritage features, reference has been made in the section on design and local character of what buildings are recognised of holding some value, and that where possible these should be retained and incorporated into new developments. Guidance on building heights also seeks to achieve a balance that allows for higher density development without over dominating the built heritage. This will help ensure existing character links to the past are not entirely erased.
- In terms of employment, reference has been made to the need to up-skill the local workforce and the important role new developments can play in terms of providing new training and education opportunities. In particular, where this is linked to the construction phase of development, there are opportunities for increasing skills in matters such as installation of renewable technologies and green roofs; which complements the Mayor's aspirations for the Upper Lee Valley to grow as a green industries hub. In addition, reference is also made to retaining valued local employers such as Dunhill's, and assisting displaced businesses to find alternative sites in the borough; such as in land designated as SIL. In terms of car free developments, reference is made to the opportunities that development sites around Blackhorse Road Station (particularly BHL1, BHL2 and BHL8) offer. It is made clear that such opportunities are linked to appropriate travel plans and developer contributions as schemes come forward so that an improved pedestrian and cyclist environment needs to be secured for this to be a viable option. The potential for car clubs to help reduce demand for car ownership is also cited.

Opportunity sites

- The Proposed Submission version of the AAP includes site plans illustrating key constraints and opportunities for key sites. In relation to Sutherland Road, this highlights where it is anticipated that existing problematic employment uses offer scope for conversion into units for creative businesses and light industry more compatible with surrounding and emerging residential.
- Guidance on sites for both Billet Works, and Webb's Industrial Estate make clear the need for new, fit for purpose employment space as part of mixed use developments to ensure a sustainable pattern of growth and ensure the areas employment function is not lost.
- Site guidance in the Proposed Submission document makes a firm commitment to the retention of the Royal Standard Pub (Tryst Public House and Standard Music Venue) into redevelopment. Reference is also made to the need to negotiate demolition and construction phases to minimise disturbance to biodiversity for both the Station Hub and Car Wash sites.
- Guidance on the Blackhorse Road/ Hawarden Road site includes references to opportunities for temporary storage uses in advance of the development of the new school; since such an approach would not preclude the longer term aspirations for the site.

**PART 3: WHAT ARE THE APPRAISAL FINDINGS AND
RECOMMENDATIONS AT THIS CURRENT STAGE?**

14 INTRODUCTION (TO PART 3)

The report must include...

- The likely significant effects on the environment associated with the draft plan approach
- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan approach

- 14.1.1 The aim of Part 3 is to present appraisal findings and recommendations in relation to the draft (Proposed Submission) plan approach. Part 3 is structured as follows:
- Chapters 15 presents an appraisal of the draft (Proposed Submission) Plan under ten ‘sustainability topic’ headings
 - Chapter 16 discusses overall conclusions at this current stage
 - Chapter 17 summarises outstanding recommendations.

15 APPRAISAL OF THE DRAFT (PROPOSED SUBMISSION) AAP

15.1 Methodology

- 15.1.1 The appraisal is structured under ‘ten sustainability topic’ headings. The range of topic headings relates to the range of sustainability objectives and issues identified through scoping. Taken together, the sustainability topics, objectives and issues provide a methodological ‘framework’ for the appraisal of likely significant effects on the baseline.
- 15.1.2 Within each sustainability topic chapter there is an appraisal of: 1) the preferred ‘Area-wide Policies’; and 2) the preferred approach to ‘Key Opportunity Sites’. For both (1) and (2) ‘significant effects’ on the baseline / likely future baseline are identified and evaluated.
- 15.1.3 Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the plan. The ability to predict effects accurately is also limited by understanding of the baseline and (in particular) the future baseline. Because of the uncertainties involved, there is a need to exercise caution when identifying and evaluating significant effects and ensure all assumptions are explained in full.¹⁹ In many instances it is not possible to predict significant effects, but it is possible to comment on the merits of the draft plan approach in more general terms.
- 15.1.4 It is important to note that effects are predicted taking into account the criteria presented within Schedule 2 of the Regs.²⁰ So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered. These effect ‘characteristics’ are described within the appraisal as appropriate.

Added structure

- 15.1.5 To give the appraisal ‘added structure’, each Area-wide Policy and Key Opportunity Site is assigned one of the following symbols in-line with predicted ‘broad implications’. It is important to note that these symbols are not used to indicate significant effects.

↗	Positive implications.
↔	No implications.
↘	Negative implications.
?	Uncertain implications.

¹⁹ As stated by Government Guidance (The Plan Making Manual, see <http://www.pas.gov.uk/pas/core/page.do?pagelid=156210>): "Ultimately, the significance of an effect is a matter of judgment and should require no more than a clear and reasonable justification."
²⁰ Environmental Assessment of Plans and Programmes Regulations 2004

15.2 Air

Relevant Sustainability objectives

- Objective 10 - Reduce greenhouse gas emissions
- Objective 12 - Improve air quality through a reduction in traffic-based emissions

Relevant sustainability issues

- Air pollution from the strategic road network is an issue across the Borough and, more recently, is affecting background locations.

Appraisal of the preferred approach to Area-wide Policy

Area-wide Policy	BHL1: Presumption in favour of sustainable development	Policy BHL2: Housing Growth	Policy BHL3: Housing Densities	Policy BHL4: Household Sizes	Policy BHL5: Affordable Housing	Policy BHL6: Employment	Policy BHL7: Neighbourhood Centre and Local Retail Parades	Policy BHL8: Design and Local Character	Policy BHL9: Open Space and Nature Conservation	Policy BHL10: Walthamstow Wetlands and Lee Valley Park	Policy BHL11: Flood Risk	Policy BHL12: Transport	Policy BHL13: Climate Change and Decentralised Energy	Policy BHL14: Social Infrastructure
Broad Implications	↔	↗	↗	↔	↔	↗	↗	↗	↗	↔	↔	↗	↗	↔

- 15.2.1 By encouraging the refurbishment of existing industrial buildings of architectural merit with high environmental standards, Policy BHL6 (Employment) is likely to have positive implications in terms of this objective by reducing **greenhouse gas emissions**.
- 15.2.2 For proposals that are one or more units or greater than 100sqm, Policy BHL13 (Climate Change and Decentralised Energy) requires developers to submit an energy assessment to demonstrate how the proposal will connect to the planned Decentralised Energy Network. This policy also requires developers to demonstrate how their proposal will contribute to sustainable resource management and high environmental standards, in line with the carbon reduction targets set out in the London Plan. By encouraging sustainable building design, this policy is likely to have positive implications by helping to reduce **greenhouse gas emissions**.
- 15.2.3 Policy BHL7 (Neighbourhood Centres) will support a hierarchy of centres, which is important from a perspective of minimising the need to travel, ensuring that day to day needs are available within walking distance and comparison shopping can be undertaken in centres that are **accessible by public transport**. This should help reduce reliance on the private car and increase travel by walking or through the use of public transport which should consequently have positive benefits in terms of **improving air quality**.
- 15.2.4 Policy BHL12 (Transport) encourages new development within easy walking distance of Blackhorse Road Station to be 'car free'. This should help reduce traffic congestion and associated pollution and as a result lead to improved **air quality** locally.
- 15.2.5 Policy BHL12 also promotes a network of streets that prioritises pedestrians, cyclists and public transport users, this should help reduce the use of private cars and increase the use of more sustainable methods of transport, which in turn should have positive benefits in terms of improving **air quality**.
- 15.2.6 It is noted that the supporting text to Policy BHL12 recognises that the Standard Junction is already **congested**, and that projected growth in the area will exacerbate these existing problems, acknowledging that infrastructure improvements are necessary.

15.2.7 It is also noted that the approach to open space and nature conservation will be to increase the amount of green space within the AAP area. New open spaces can provide a buffer between sources of **air pollution** (e.g. roads and industry) and sensitive receptors (e.g. housing and schools).

Appraisal of the preferred approach to Opportunity Sites

Opportunity Sites	BHL1	BHL2 North	BHL2 South	BHL3	BHL4 North	BHL4 South	BHL5	BHL6	BHL7	BHL8	BHL9	BHL10	BHL11
Broad Implications	↗	↗	↘	↔	↗	↗	↔	↔	↗	↗	↔	↔	↔

15.2.8 The mixed-use development approach proposed for 8 of the Opportunity Sites is generally expected to have positive or no implications on the air quality objectives. This is due to the fact that mixed-use developments located close to public transport links should help reduce the need for people to travel long distances to access key services.

15.2.9 Site BHL2 South, which is currently vacant, is in an area that is known to suffer from congestion. The Council’s preferred long term approach to the site is to develop it for education use. Although bringing the site back into use through the provision of new education facilities would result in positive implications in terms of many of the sustainability objectives, it would result in an increase in traffic to the site which could have negative implications in terms of local **air quality**. It will therefore be important that a sustainable travel plan is developed to support proposals that come forward.

Summary

15.2.10 The **area-wide policies** are either expected to have either a **positive effect** or ‘no effect’ in terms of air-related sustainability objectives. Policy BHL12 has particularly beneficial implications as a result of encouraging car free developments and promoting a network of streets that priorities the use of sustainable methods of transport.

15.2.11 The approach to **opportunity sites** is also expected to have a largely **positive effect** given that there is an emphasis on mixed-use developments that are on the whole located in close proximity to good public transport links. This should help to maximise the ability for people to walk short distances to access their daily needs and increase the use of public transport when medium to long distance travel is necessary.

15.3 Biodiversity

Relevant Sustainability objectives

- Objective 17 - To conserve and enhance biodiversity
- Objective 18 - Protect the ecological integrity of Natura 2000 sites

Relevant sustainability issues

- Parts of Epping Forest are in an ‘unfavourable’ or ‘unfavourable/declining’ condition

Appraisal of the preferred approach to Area-wide Policy

Area-wide Policy	BHL1: Presumption in favour of sustainable development	Policy BHL2: Housing Growth	Policy BHL3: Housing Densities	Policy BHL4: Household Sizes	Policy BHL5: Affordable Housing	Policy BHL6: Employment	Policy BHL7: Neighbourhood Centre and Local Retail Parades	Policy BHL8: Design and Local Character	Policy BHL9: Open Space and Nature Conservation	Policy BHL10: Walthamstow Wetlands and Lee Valley Park	Policy BHL11: Flood Risk	Policy BHL12: Transport	Policy BHL13: Climate Change and Decentralised Energy	Policy BHL14: Social Infrastructure
Broad Implications	↔	↔	↔	↔	↔	↔	↔	↔	↗	↗	↗	↔	↔	↔

- 15.3.1 Policy BHL9 (Open Space and Nature Conservation) seeks to incorporate measures that both protect and enhance biodiversity in the area, through requiring that new developments avoid any negative impact on the Lee Valley Special Protection Area and Ramsar site and for new developments to incorporate measures that enhance biodiversity (e.g. green/ brown roofs and green corridors). This approach is likely to have positive effects in terms of the biodiversity related objectives.
- 15.3.2 Policy BHL10 (Walthamstow Wetlands and Lee Valley Regional Park) seeks to capitalise on the Walthamstow Wetlands, which are an exceptional local asset. The policy also seeks to increase opportunities for public use of this area. The local population will benefit greatly from increased access to and appreciation of nature / natural heritage.
- 15.3.3 The only questionable effect of increasing access to Walthamstow Wetlands relates to the potential for increased recreational disturbance to sensitive habitats and wildlife (particularly wintering waterfowl). This potential effect also stems from the fact that higher density development is planned at the new neighbourhood centre, which is located in close proximity to the Wetlands. However, the effect is uncertain, particularly given that there will also be new open spaces created, which will themselves be used for recreational purposes. If there is any residual potential for impacts to the Walthamstow Wetlands, it is likely that effects can be avoided or sufficiently mitigated through careful management of access and other practical measures.

Appraisal of the preferred approach to Opportunity Sites

Opportunity Sites	BHL1	BHL2 North	BHL2 South	BHL3	BHL4 North	BHL4 South	BHL5	BHL6	BHL7	BHL8	BHL9	BHL10	BHL11
Broad Implications	↗	↗	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔

- 15.3.4 Sites BHL1 and BHL2 North are located in close proximity to the Walthamstow Wetlands and development of these sites should offer potential for enhancing the green infrastructure connections in this area through landscaping, creation of green space and provision of new routes into Lee Valley Regional Park. It is however noted that intensification of uses on these sites is likely to increase the usage of the Wetlands area which may give rise to some negative impacts. It will therefore be important that any negative impacts are avoided or sufficiently mitigated through careful management of access and other practical measures at the design and implementation phase

Summary

- 15.3.5 The majority of the **area-wide policies** are not expected to have any effects in terms of biodiversity-related sustainability objectives with the exception of policies BHL9 - 11 which should have **positive effects** on the biodiversity baseline through enhancing and protecting biodiversity assets in the area.
- 15.3.6 The policy approach to **sites** BHL1 and BHL2 North could have a combination of positive and negative effects in terms of biodiversity. **Positive effects** are likely to result from enhancements to green infrastructure provision on the sites. However housing growth in the area is expected to result in an intensification of uses and subsequently an increase in the use of the Wetlands area which may give rise to some **negative effects**.

15.4 Crime and safety

Relevant Sustainability objectives

- Objective 2 - Reduce crime and the fear of crime.

Relevant sustainability issues

- Crime levels are generally higher in Waltham Forest than nationally.

Appraisal of the preferred approach to Area-wide Policy

Area-wide Policy	BHL1: Presumption in favour of sustainable development	Policy BHL2: Housing Growth	Policy BHL3: Housing Densities	Policy BHL4: Household Sizes	Policy BHL5: Affordable Housing	Policy BHL6: Employment	Policy BHL7: Neighbourhood Centre and Local Retail Parades	Policy BHL8: Design and Local Character	Policy BHL9: Open Space and Nature Conservation	Policy BHL10: Walthamstow Wetlands and Lee Valley Park	Policy BHL11: Flood Risk	Policy BHL12: Transport	Policy BHL13: Climate Change and Decentralised Energy	Policy BHL14: Social Infrastructure
Broad Implications	↔	↔	↔	↔	↔	↔	↔	↗	↔	↔	↔	↔	↔	↔

- 15.4.1 Crime and safety is not a focus of the AAP however it is expected that the overall effect of the AAP policies will be to bring about economic regeneration and reduce deprivation locally. It is likely that a knock-on effect of this will be to **reduce crime** and the **fear of crime**.
- 15.4.2 It is expected that the effect of several policies will be to improve the quality of the built environment and public realm, and to ensure the development of a neighbourhood centre that is a 'hub of activity' throughout the daytime and evening. These factors should also help to **reduce fear of crime** locally.
- 15.4.3 Policy BHL8 (Design and Local Character) seeks new residential developments to have 'active frontages'. The implications of this policy are that the design of new housing developments should encourage overlooking which should help to **reduce the fear of crime**, as well as **potentially reduce the likelihood of crime occurring**.

Appraisal of the preferred approach to Opportunity Sites

Opportunity Sites	BHL1	BHL2 North	BHL2 South	BHL3	BHL4 North	BHL4 South	BHL5	BHL6	BHL7	BHL8	BHL9	BHL10	BHL11
Broad Implications	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔

15.4.4 Crime and safety is not a focus of the AAP. However the re-development of many of the sites with mixed-use development that incorporate housing could potentially have a **positive effect** on reducing crime and the fear of crime through increasing footfall in the area, particularly outside normal working hours; the effects of this should be particularly beneficial on sites which are currently vacant (for example, Site BHL2 South) through bringing them back into use, and where the current principal use is industrial.

Summary

15.4.5 The approach to **area-wide policies** and opportunity sites should have positive implications in terms of reducing crime and fear of crime; however, the potential to result in significant effects on the baseline is unclear.

15.5 Economy

Relevant Sustainability objectives

- Objective 21 - Maintain and enhance the vitality and viability of the Borough’s town centres
- Objective 22 - Improve the local economy by attracting inward investment
- Objective 23 - Maintain stable levels of employment in the Borough

Relevant sustainability issues

- Low levels of economic growth in the Borough
- Declining industrial sectors and under-representation of growth sectors

Appraisal of the preferred approach to Area-wide Policy

Area-wide Policy	BHL1: Presumption in favour of sustainable development	Policy BHL2: Housing Growth	Policy BHL3: Housing Densities	Policy BHL4: Household Sizes	Policy BHL5: Affordable Housing	Policy BHL6: Employment	Policy BHL7: Neighbourhood Centre and Local Retail Parades	Policy BHL8: Design and Local Character	Policy BHL9: Open Space and Nature Conservation	Policy BHL10: Walthamstow Wetlands and Lee Valley Park	Policy BHL11: Flood Risk	Policy BHL12: Transport	Policy BHL13: Climate Change and Decentralised Energy	Policy BHL14: Social Infrastructure
Broad Implications	↔	↗	↗	↗	↗	↗	↗	↗	↗	↗	↗	↔	?	↔

15.5.1 The housing policies, particularly Policy BHL4 (Household Sizes), should ensure that young professionals are attracted to the area. In particular, younger professionals should be attracted to the redeveloped station hub area, where higher density development will be available in close proximity to public transport and the Walthamstow Wetlands. New residents will spend money in the new neighbourhood centre and may take up newly created jobs locally. This is an important element of the plan to **attract investment** to the area.

15.5.2 Policy BHL6 (Employment) is focused on delivering significant change in the structure of the local employment sector. The effect should be to diversify employment opportunities locally, and ensure that there is a focus on growth industries (in particular creative industries). This should help to ensure investment locally. This policy also seeks to provide new employment space which is likely to **attract new businesses** to the area.

15.5.3 Policy BHL7 (Neighbourhood Centre and Local Retail Parade) should help to ensure that this area reaches a critical mass whereby it becomes a recognised **hub of economic activity**, whilst at the same time not drawing investment away from Walthamstow Town Centre.

- 15.5.4 Policy BHL8 (Design and Local Character), Policy BHL9 (Open space and Nature Conservation) and Policy BHL10 (Walthamstow Wetlands and Lee Valley Regional Park) all set out targeted measures that should contribute to an all-round improved image of the area, which in turn should **increase its attractiveness to investors**.
- 15.5.5 Policy BHL11 (Flood Risk) should ensure that flood risk does not present a barrier to investment and regeneration. The policy presents a range of design measures that must be incorporated into development within areas of flood risk. Measures will be financed by developers; however this approach is preferable to no development at all. Furthermore, it may be that cost efficiencies can be identified over time (i.e. if developers learn from and share experience).
- 15.5.6 The approach to transport and travel (Policy BHL12) is focused on support for sustainable modes of transport, at the expense of the private car. In the long-term, it is expected that this will enhance the **attractiveness of the area as a place to invest**. However, in the short-term it is recognised that **some businesses may be negatively affected**.
- 15.5.7 Setting requirements to incorporate decentralised energy infrastructure as part of development (Policy BHL13) could act as something of a disincentive to investment locally. However, the policy provides some flexibility by allowing developers to opt out of linking to the network where it can be demonstrated that doing so would result in development becoming financially unviable.
- 15.5.8 The approach to social infrastructure (Policy BHL14) sets out clear priorities that should help to provide financial certainty for those looking to invest in the area.

Appraisal of the preferred approach to Opportunity Sites

Opportunity Sites	BHL1	BHL2 North	BHL2 South	BHL3	BHL4 North	BHL4 South	BHL5	BHL6	BHL7	BHL8	BHL9	BHL10	BHL11
Broad Implications	↗	↗	↗	↔	↗	↗	↔	↗	↗	↗	↔	↗	↗

- 15.5.9 By seeking a mix of uses, including new homes, retail, business space and social infrastructure, the preferred approach to Sites BHL1 and BHL2 North is likely to result in positive implications in terms of supporting the **vitality and viability of the town centre**. This is particularly important in the case of Site BHL1 given the prominence of the site. The policy’s focus on small retail and business uses will help ensure that a local centre develops that sits within the exiting desired hierarchy of local centres and town centres in the borough.
- 15.5.10 Through the development of Site BHL6, a new mixed-use development would be created which would involve the provision of business units to support a shift towards the creative industries and small scale retail and/or social infrastructure, which would lead to **increased job provision** in the area.
- 15.5.11 Development of Site BHL7 would result in **better use** being made of the site through a mixed-use development. While it is noted that some industrial employment uses would be lost, it is not thought that the scale of this effect is such that there will be impacts in terms of access to suitable employment for existing local residents.
- 15.5.12 Re-development of Site BHL8, which is a prominent site currently used for offices and a builders yard on Blackhorse Road, to a mixed-use development, should improve the image of the area, and in doing so should help **attract future inward investment** to the borough.

Summary

15.5.13 Ten of the **opportunity sites** propose employment generating uses as part of new development which should have **positive effects** in terms of the economic related objectives. In particular the mixed-use approach proposed for the opportunity sites surrounding Blackhorse Road Station should help to support and enhance the vitality and viability of the town centre.

15.6 Employment and skills

Relevant Sustainability objectives

- Objective 5 - Improve educational attainment in schools
- Objective 6 - Improve opportunities for access to education and training for all residents
- Objective 7 - Reduce the overall level of deprivation
- Objective 22 - Improve the local economy by attracting inward investment
- Objective 23 - Maintain stable levels of employment in the Borough

Relevant sustainability issues

- Average salaries for those working in Waltham Forest are lower than average salaries for those living in the Borough. This disparity could affect the Borough’s ability to attract inward investment
- Unemployment levels are higher than the average for Great Britain
- Educational attainment is relatively low and a high proportion of people have no qualifications

Appraisal of the preferred approach to Area-wide Policy

Area-wide Policy	BHL1: Presumption in favour of sustainable development	Policy BHL2: Housing Growth	Policy BHL3: Housing Densities	Policy BHL4: Household Sizes	Policy BHL5: Affordable Housing	Policy BHL6: Employment	Policy BHL7: Neighbourhood Centre and Local Retail Parades	Policy BHL8: Design and Local Character	Policy BHL9: Open Space and Nature Conservation	Policy BHL10: Walthamstow Wetlands and Lee Valley Park	Policy BHL11: Flood Risk	Policy BHL12: Transport	Policy BHL13: Climate Change and Decentralised Energy	Policy BHL14: Social Infrastructure
Broad Implications	↔	↗	?	?	?	↗	↗	↗	↗	↔	↔	↗	↔	↗

15.6.1 Policy BHL6 (Employment) should have the greatest positive impact in terms of the employment and skills objectives. The policy should result in the provision of new B1 units for small/medium businesses as part of new mixed-use development at the Opportunity Sites. This approach is likely to result in existing employment uses, particularly industrial, to be displaced in the future to land designated as SIL. Although the approach should help to **attract inward investment** to the area, it will be important to ensure that reducing the prominence of traditional industries does not impact significantly on particular sectors of the existing community that rely on these businesses.

15.6.2 Policy BHL6 seeks to support proposals for development that offer **education and training opportunities** for local residents within new, mixed use development, outside of land designated as SIL. This approach is expected to have positive implications in terms of improving opportunities for access to education and training for all residents.

- 15.6.3 Policy BHL6 also requires proposals for redevelopment for non-employment use or training purposes on existing employment land out with SIL to demonstrate that the existing space is no longer fit for purpose and has no reasonable prospect for coming forward for future employment use. This policy should help ensure that **employment land is protected** unless it can be demonstrated that it is no longer fit for purpose.
- 15.6.4 Policies BHL7 (Neighbourhood Centre and Local Retail Parade) and BHL8 (Design and Local Character), seek to ensure that development proposals provide opportunities for enhancing the public realm and new public open spaces; this should help enhance the appearance of the area which in turn is likely to **attract further investment** to the area.

Appraisal of the preferred approach to Opportunity Sites

Opportunity Sites	BHL1	BHL2 North	BHL2 South	BHL3	BHL4 North	BHL4 South	BHL5	BHL6	BHL7	BHL8	BHL9	BHL10	BHL11
Broad Implications	↗	↗	↗	↔	↗	↗	↔	↗	↗	↗	↔	↗	↗

- 15.6.5 A number of the Opportunity Sites propose mixed-use developments with B1 uses which should lead to a **greater number of employment opportunities** locally (i.e. it will be possible to support more jobs per m² of employment floorspace) and it is expected that a mixture of small business will also ensure that local employment is resilient (where as many traditional industries would be more likely to struggle, and experience decline over time). However, it will be important to ensure that reducing the prominence of traditional industries does not impact significantly on particular sectors of the community that rely on these businesses.
- 15.6.6 Site BHL4 is a key site on Sutherland Road, where the policy approach is for there to be a considerable shift away from existing industrial employment uses towards creative industry uses. This shift in uses **may have some negative implications in terms of local employment in the traditional industries**; however, if implemented, the proposals would result in the development of 2000m² of business space which would **create new employment opportunities** in the creative industries.
- 15.6.7 Several of the Opportunity Sites also propose mixed-use developments with A1 uses (for example, Sites BHL6, BHL7 and BHL9). This should also result in the creation of **new employment opportunities** locally, though the majority of these are likely to be lower salary jobs.
- 15.6.8 The preferred approach to Site BHL2 South on Blackhorse Road/Howarden Road would involve the creation of a new secondary school on what is currently a vacant site. Development of the site would not only help to meet the growing demand for secondary school places in the area, but bringing the site back into use would also help to enhance the appearance and character of the site and its surroundings; a knock-on effect of this in the longer term would be a likely **increase in investment to the area**. It is noted that the Council's preference in the interim is for the site to be used for temporary storage. This is considered to be an appropriate use for the site in the short term.
 - **Recommendation** - Given the prominence of Site BHL2 South, reference could be made to the importance of achieving good 'visual appearance' during the time when the site is used for temporary storage.
- 15.6.9 The proposals for Site BHL10 (Marine Engine House) would involve the creation of a new visitor/education centre and café. The approach proposed for Site BHL11 (The Old Copperfield) would also lead to the delivery of a new café. Both developments would therefore have minor positive benefits with regards to the employment objectives by generating a small number of new jobs.

Summary

15.6.10 Ten of the **opportunity sites** propose employment generating uses, many of which have a particular emphasis on the creative industries, as part of new development which should have overall **positive implications** in terms of the employment objectives. However it is notable that the policy approach to employment is likely to also have some negative implications in terms of reducing employment opportunities in the traditional industries. It will therefore be important to ensure that reducing the prominence of traditional industries does not impact significantly on particular sectors of the community that rely on these businesses, for example through ensuring that new B1 business space is flexible to accommodate a variety of occupants.

15.7 **Housing**

Relevant Sustainability objectives

- Objective 1 - Meet local housing needs through the provision of a range of tenures and sizes of new dwellings
- Objective 7 - Reduce the overall level of deprivation
- Objective 11 – Conserve energy
- Objective 16 - Make the best use of previously developed land (PDL) and existing buildings

Relevant sustainability issues

- There is a disparity between the cost of housing and the amount that people are able to borrow to purchase a home, which means that many people are unable to access the property market
- There is a potential shortfall in the provision of family accommodation
- There is a shortfall in the provision of affordable housing to meet the requirements of those in housing need

Appraisal of the preferred approach to Area-wide Policy

Area-wide Policy	BHL1: Presumption in favour of sustainable development	Policy BHL2: Housing Growth	Policy BHL3: Housing Densities	Policy BHL4: Household Sizes	Policy BHL5: Affordable Housing	Policy BHL6: Employment	Policy BHL7: Neighbourhood Centre and Local Retail Parades	Policy BHL8: Design and Local Character	Policy BHL9: Open Space and Nature Conservation	Policy BHL10: Walthamstow Wetlands and Lee Valley Park	Policy BHL11: Flood Risk	Policy BHL12: Transport	Policy BHL13: Climate Change and Decentralised Energy	Policy BHL14: Social Infrastructure
Broad Implications	↔	↗	↗	↗	↗	?	↔	?	↔	↔	↗	↔	↗	↗

15.7.1 Policy BHL2 (Housing Growth) sets out the need to deliver up to 2,300 new homes in the Blackhorse Lane area, with the aim of delivering the majority of new housing as a key element of mixed use schemes in the Opportunity Sites. In the longer term, the delivery of new housing in the Blackhorse Lane area should provide a **positive contribution to the borough’s housing target and housing need**.

15.7.2 Policies BHL2 – BHL5 set out a targeted approach to meeting housing need, with higher density development (targeted particularly at younger professionals) around the new neighbourhood centre and lower density development (targeted particularly at families) in other locations.

15.7.3 Policy BHL14 (Social Infrastructure) should ensure that housing growth is supported by the appropriate social infrastructure in order to mitigate the effects of increased housing provision on existing infrastructure.

Appraisal of the preferred approach to Key Opportunity Areas

Opportunity Sites	BHL1	BHL2 North	BHL2 South	BHL3	BHL4 North	BHL4 South	BHL5	BHL6	BHL7	BHL8	BHL9	BHL10	BHL11
Broad Implications	↗	↗	↔	↔	↗	↗	↔	↗	↗	↗	↔	↔	↔

15.7.4 Site BHL1 proposes the creation of a mixed-use development comprising of 1000 residential units in the new Neighbourhood Centre, the majority of which are likely to be flats, in a location that benefits from good public transport links. Site BHL2 North also proposes higher density residential units as part of a mixed-use scheme in this area. Both policies are likely to have positive implications in terms of **meeting the housing needs** of young professionals already living in the area, as well as attracting young professionals to the borough.

15.7.5 Policies for Sites BHL4 North and BHL4 South, BHL6 and BHL7 would also have positive implications for **addressing local housing need**, with Site BHL7 offering the opportunity to **address the housing needs** of families in particular, through the provision of lower density housing in proximity to schools.

15.7.6 The proposals for Site BHL8 on Blackhorse Road would have positive implications for the area by making better use of the site through providing housing, alongside commercial and business units, in a relatively central location that benefits from good accessibility to public transport.

Summary

15.7.7 The approach proposed for nine of the opportunity sites should lead to the delivery of new housing across a range of sizes and tenures. This is expected to have **positive effects** in terms of achieving the housing objectives, particularly in meeting local housing needs.

15.8 Human health

Relevant sustainability objectives

- Objective 3 - Improve the standard of health and wellbeing of those who live and work in the Borough
- Objective 4 - Improve the provision of, and access to, community facilities to meet local cultural, recreational and social needs
- Objective 12 - Improve air quality through a reduction in traffic-based emissions

Relevant sustainability issues

- Life expectancy is lower than the average for London and the rest of the country
- Health inequalities for Black and Minority Ethnic groups
- Southern part of the Borough is subject to higher levels of poor health, which has been associated with deprivation, poverty and overcrowding

Appraisal of the preferred approach to Area-wide Policy

Area-wide Policy	BHL1: Presumption in favour of sustainable development	Policy BHL2: Housing Growth	Policy BHL3: Housing Densities	Policy BHL4: Household Sizes	Policy BHL5: Affordable Housing	Policy BHL6: Employment	Policy BHL7: Neighbourhood Centre and Local Retail Parades	Policy BHL8: Design and Local Character	Policy BHL9: Open Space and Nature Conservation	Policy BHL10: Walthamstow Wetlands and Lee Valley Park	Policy BHL11: Flood Risk	Policy BHL12: Transport	Policy BHL13: Climate Change and Decentralised Energy	Policy BHL14: Social Infrastructure
Broad Implications	↔	↗	↗	↔	↔	↗	↗	↗	↗	↗	↔	↗	↔	↔

- 15.8.1 The effect of housing policies BL2, BL3, and BL4 will be to ensure that there is a focus on mixed use development, with higher density development around Blackhorse Road Station. This should encourage residents to walk or cycle, rather than travel by private car. High quality design of higher density residential should also help to support wellbeing. Walking, cycling and use of public transport will also be supported by specific measures set out within Policy BHL12 (Transport).
- 15.8.2 A benefit of focusing higher density development around the station hub is also that this location has **good access** to the Walthamstow Wetlands - an area of high quality open space. There are plans to enhance access to the Walthamstow Wetlands, and the wider Lee Valley beyond, as set out within Policies BHL9 (Open Space and Nature Conservation) and BHL10 (Walthamstow Wetlands and Lee Valley Regional Park). Policy BHL9 also seeks to ensure that **new open space** areas are provided as part of any new development scheme, along with appropriate landscaping more generally. This should help to ensure significantly positive effects in terms of **improving the wellbeing** of residents.
- 15.8.3 It is also noted that Policy BHL8 (Design and Local Character) places an emphasis on significant change to the built environment and the public realm. This should have **benefits in terms of health and well-being**, as it should allow for **increased access to green space and pedestrian and cycle movements**. Improvements to open space and the public realm, plus the development of a vibrant neighbourhood centre (BHL7), may support increased social cohesion and reduce exclusion.
- 15.8.4 Policy BHL6 (Employment) will be to provide new B1 units for small / medium businesses and creative industries, displacing existing employment uses and ensuring that these uses are, in the future, focused more within land designated as SIL. This has **important health implications** given that there are existing problems of employment uses affecting residential amenity and environmental quality. This conflict would only worsen in the future as residential development is directed to the AAP area as a central tenet of regeneration.
- 15.8.5 It is important to note that the AAP will not seek to focus on increasing local provision of all social infrastructure (Policy BHL13). Rather, there will be a focus on **increased local provision of health and education facilities**. This is thought to be an appropriate approach.

Appraisal of the preferred approach to Opportunity Sites

Opportunity Sites	BHL1	BHL2 North	BHL2 South	BHL3	BHL4 North	BHL4 South	BHL5	BHL6	BHL7	BHL8	BHL9	BHL10	BHL11
Broad Implications	↗	↗	↔	↔	↗	↗	↔	↗	↗	↔	↔	↔	↔

- 15.8.6 The development of higher density mixed use development at Site BH1 may help to ensure that housing needs are met in a location that will encourage walking and cycling. The site also benefits from its proximity to the Walthamstow Wetlands, and the site policy describes how this opportunity will be capitalised upon through creation of an east-west linear park. This access to high quality open space should lead to **health and well-being benefits** for residents.
- 15.8.7 The policy for site BHL2 North also proposes a higher density mixed use development in a location that will encourage walking and cycling, and which benefits from excellent public transport links. Car free development can be supported on the residential element of any scheme here. The site also benefits from its proximity to the Walthamstow Wetlands. Access to high quality open space should lead to **health and well-being benefits** for residents.
- 15.8.8 As a result of proposals for BHL4 North and BHL4 South, existing industrial uses that are less compatible with nearby residential should be lost. This has **important health implications** given that there are existing problems of employment uses affecting residential amenity and environmental quality. Measures will also be taken to improve the safety of the public realm and the quality of the environment for cyclists and pedestrians, with likely positive effects.
- 15.8.9 Through the development of Site BHL6, an important opportunity will be realised to improve access to a new neighbourhood centre, and the wetlands for residents in the area. This may help to **improve social cohesion** and allow greater access to natural open space, with associated **health benefits**. Site BHL7 features open space to the north. Development here can exploit such assets through the introduction of physical links.

Summary

- 15.8.10 Overall both the area-wide and the site specific policies should have a **positive effect** on the human health topic.
- 15.8.11 The housing policies should help lead to the creation of higher density mixed-use development around Blackhorse Road Station which should encourage the use of more sustainable modes of travel which will have positive effects on the health and wellbeing of residents. Policy BHL8 should also support the creation of developments of high quality design as well as lead to improvements to the public realm which would also help to support wellbeing.

15.9 Landscape and townscapes

Relevant sustainability objectives

- Objective 11 - Conserve Energy
- Objective 16 - Make the best use of previously developed land (PDL) and existing buildings
- Objective 19 - Maintain and enhance the quality of green belt and open space areas
- Objective 20 - Conserve and enhance the historic built and natural environment

Relevant sustainability issues

- Development pressure could lead to the loss of open space or recreation facilities

Appraisal of the preferred approach to Area-wide Policy

Area-wide Policy	BHL1: Presumption in favour of sustainable development	Policy BHL2: Housing Growth	Policy BHL3: Housing Densities	Policy BHL4: Household Sizes	Policy BHL5: Affordable Housing	Policy BHL6: Employment	Policy BHL7: Neighbourhood Centre and Local Retail Parades	Policy BHL8: Design and Local Character	Policy BHL9: Open Space and Nature Conservation	Policy BHL10: Walthamstow Wetlands and Lee Valley Park	Policy BHL11: Flood Risk	Policy BHL12: Transport	Policy BHL13: Climate Change and Decentralised Energy	Policy BHL14: Social Infrastructure
Broad Implications	↔	↔	↔	↔	↔	↗	↔	↗	↗	↔	↔	↔	↔	↔

- 15.9.1 Whilst there are no designated historic areas or assets locally, and much of the built environment is of somewhat poor quality, there are nonetheless benefits to ensuring links to the past remain apparent as part of redevelopment. Furthermore, making use of existing buildings represents an **efficient use of resources**.
- 15.9.2 It is noted that the general approach to employment (BHL6) is to change the use of land currently used for traditional industrial purposes. In many instances, this will mean that buildings are demolished. However, this policy does specify that **existing industrial buildings of architectural merit will be refurbished** where viable.
- 15.9.3 The station area is relatively important from a local historical perspective. Higher density development may increase the chance that historic character is lost. However, it is likely that impacts can be avoided through the careful integration of heritage features. Policy BHL7 (Neighbourhood Centre and Local Retail Parades) seeks to ensure that identified existing buildings in the area that make a positive contribution in this respect will be integrated as part of redevelopment. Nonetheless, the emphasis on creating a new character for the area will mean that many buildings will not be retained.
- 15.9.4 Another important Policy is BHL9 (Open Space and Nature Conservation), which seeks to ensure that **new open space** areas are provided, along with appropriate landscaping more generally. Existing open spaces are also to be protected and enhanced, and opportunities for increased public use welcomed. These measures should help to ensure significantly positive effects in terms of the quality of open space provision.
- 15.9.5 More generally, it is expected that the effect of the AAP will be to address the relatively poor quality of the built environment and the public realm (for instance, the new public open spaces, including internal courtyards through policy BHL7). Targeted measures are identified, including a focus on environmental enhancements to Forest Road in recognition of the fact that it is an important 'gateway' to the Walthamstow Wetlands and the wider borough.

Appraisal of the preferred approach to Opportunity Sites

Opportunity Sites	BHL1	BHL2 North	BHL2 South	BHL3	BHL4 North	BHL4 South	BHL5	BHL6	BHL7	BHL8	BHL9	BHL10	BHL11
Broad Implications	↗	↔	↔	↗	↔	↔	↔	↔	↔	↔	↔	↗	↗

- 15.9.6 It is particularly notable that the proposed approach for Site BHL1 recognises the need for new development to be 'harmonised' with the heritage of the area. This should have a positive influence given the range of building of merit identified in the area. It is suggested that building height be limited in order to avoid over-dominating these assets.

- 15.9.7 Whilst the school buildings that make up Willowfield secondary school (Site BHL3) are not locally or statutorily listed, two sections are regarded as providing typical examples of a Victorian school and are considered to have heritage interest. The AAP calls for these sections to be retained by developers where possible, potentially leading to some positive effect on the **conservation of the built environment**.
- 15.9.8 The Marine Engine House, which is to be brought forward as a visitor centre (Site BHL10), has been recommended as an addition to the Council’s local list as a result of its architectural, aesthetic and historical value. Restoration should help to secure the future of the building and so result in significantly positive effects.
- 15.9.9 The Old Coppermill (BHL11) is Grade II listed and is currently a training facility for Thames Water. A partial conversion of this site may help to increase its long term viability and improve its condition.

Summary

- 15.9.10 Overall the AAP is expected to have **positive effects** on both the area’s natural and built environment. BHL7 should ensure that the relatively poor quality of the built environment and the public realm is enhanced. Targeted measures are also identified, including a focus on environmental enhancements to Forest Road in recognition of the fact that it is an important ‘gateway’ to the Walthamstow Wetlands and the wider borough.
- 15.9.11 Other policies, for example Policy BHL10 for the Marine Engine House, would result in the restoration of key built heritage assets as part of new development schemes which would have significant **positive effects** in terms of the townscape objectives.

15.10 Transport

Relevant sustainability objectives

- Objective 8 - Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system
- Objective 10 - Reduce greenhouse gas emissions

Relevant sustainability issues

- Reliance on the private car as the main mode of transport, contributing to air pollution, greenhouse gas emissions and congestion
- Increasing car ownership, personal wealth and population is expected to place further demands on the local transport network leading to increased congestion and time spent travelling
- Expansion of the transport network could require additional land that may otherwise have been given to other uses

Appraisal of the preferred approach to Area-wide Policy

Area-wide Policy	BHL1: Presumption in favour of sustainable development	Policy BHL2: Housing Growth	Policy BHL3: Housing Densities	Policy BHL4: Household Sizes	Policy BHL5: Affordable Housing	Policy BHL6: Employment	Policy BHL7: Neighbourhood Centre and Local Retail Parades	Policy BHL8: Design and Local Character	Policy BHL9: Open Space and Nature Conservation	Policy BHL10: Walthamstow Wetlands and Lee Valley Park	Policy BHL11: Flood Risk	Policy BHL12: Transport	Policy BHL13: Climate Change and Decentralised Energy	Policy BHL14: Social Infrastructure
Broad Implications	↔	↗	↗	↗	↔	↔	↗	↗	↗	↗	↔	↗	↔	↗

- 15.10.1 Policy BHL12 (Transport) could lead to significantly positive effects in terms of this objective. This policy outlines measures that seek to capitalise on the area’s **locational opportunities** and that will address existing problems, such as access to Walthamstow Wetlands. The policy also encourages car free developments which should lead to a considerable decrease in the ability to park cars, so likely reduce usage. It is also noted that improved pedestrian links across the Standard Junction are identified as a key priority, and it is identified that developer contributions may be directed towards this scheme.
- 15.10.2 The effect of housing policies BL2, BL3, and BL4 will be to ensure that there is a focus on mixed use development, with higher density development around Blackhorse Road Station. Existing **public transport accessibility** will also be considered when bringing forward development. Such measures should encourage residents to adopt sustainable forms of transport.
- 15.10.3 Policy BHL7 (Neighbourhood Centres) will support a hierarchy of centres, which is important from a perspective of minimising the need to travel, ensuring that day to day needs are available within walking distance and comparison shopping can be undertaken in centres that are **accessible by public transport**.
- 15.10.4 Policy BHL8 (Design and Local Character) is supportive of efforts to increase walking, cycling and use of public transport as it should facilitate the **delivery of new access routes**. The preservation and provision of key social infrastructure in the area through policy BHL14 may also help to encourage the use of **sustainable means of transport**.

Appraisal of the preferred approach to Opportunity Sites

Opportunity Sites	BHL1	BHL2 North	BHL2 South	BHL3	BHL4 North	BHL4 South	BHL5	BHL6	BHL7	BHL8	BHL9	BHL10	BHL11
Broad Implications	↗	↗	↔	↔	↔	↗	↔	↗	↘	↗	↔	↗	↔

- 15.10.5 It is noted that at Site BH1 and at BH2 North, higher density mixed use development will help to ensure housing needs are met in a location that will encourage walking and cycling, and that has excellent public transport links. Public realm improvements focusing on pedestrians and cyclists are proposed for site BH2 North and BHL4 South.

Site BHL6 is situated between Blackhorse Road station and existing and emerging residential communities to the north east. As such, an important opportunity will be realised to improve **access to the station**. Site BHL8 has **good accessibility** to public transport and so represents a suitable location for residential development. Car parking provision is to be minimal at Site BHL10 in order to maximise the potential of local improvements in pedestrian and cyclist access.
- 15.10.6 There is potentially some scope for adverse effects in the case of site BHL7. This site has **relatively poor transport accessibility** when compared to the other opportunity sites. Developer contributions to bus capacity improvements may help to mitigate this somewhat, as long as they are proportionate to the scale of the development brought forward.
- 15.10.7 It is also noted that land is safeguarded at Blackhorse Road / Hawarden Road (BHL2 South) for a school to come forward at some point in the future. The AAP recognises the importance of proposals including a school travel plan and transport assessment in order to address **access issues** relating to Blackhorse Road and Hawarden Road.

Summary

- 15.10.8 The **area-wide policies** are largely expected to have either no effects or **positive effects** in terms of the transport related objectives.

- 15.10.9 In particular Policy BHL12 is expected to lead to significantly **positive effects** by capitalising on the area’s locational opportunities and encouraging the creation of a network of streets that are designed for all users.
- 15.10.10 Policy BHL7 which supports a hierarchy of centres should also have **positive effects** in terms of this objective by minimising the need to travel, ensuring that day to day needs are available within walking distance and that comparison shopping can be undertaken in centres that are accessible by public transport.
- 15.10.11 The majority of the **opportunity sites** are located in relatively close proximity to good public transport connections and are therefore expected to have either no effects or **positive effects** in terms of the transport objectives. The only Opportunity Site that is expected to have some **negative effects** is Site BHL7. This is due to the lack of accessibility to public transport links in the area; it will therefore be important that measures are put in place (i.e. through developer contributions) to ensure that local bus capacity is increased.

15.11 Waste

Relevant sustainability objectives

- Objective 9 - Reduce production of waste and increase recycling

Relevant sustainability issues

- The amount of waste produced per person is not decreasing over time
- Although levels of recycling are increasing over time the proportion of waste recycled is not yet meeting Government targets

Appraisal of the preferred approach to Area-wide Policy

Area-wide Policy	BHL1: Presumption in favour of sustainable development	Policy BHL2: Housing Growth	Policy BHL3: Housing Densities	Policy BHL4: Household Sizes	Policy BHL5: Affordable Housing	Policy BHL6: Employment	Policy BHL7: Neighbourhood Centre and Local Retail Parades	Policy BHL8: Design and Local Character	Policy BHL9: Open Space and Nature Conservation	Policy BHL10: Walthamstow Wetlands and Lee Valley Park	Policy BHL11: Flood Risk	Policy BHL12: Transport	Policy BHL13: Climate Change and Decentralised Energy	Policy BHL14: Social Infrastructure
Broad Implications	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔

- 15.11.1 Waste management is not currently a focus of the AAP. It may be expected that higher density development and design of new shared / public realm areas will create opportunities for waste management.

Appraisal of the preferred approach to Opportunity Sites

Opportunity Sites	BHL1	BHL2 North	BHL2 South	BHL3	BHL4 North	BHL4 South	BHL5	BHL6	BHL7	BHL8	BHL9	BHL10	BHL11
Broad Implications	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔

- 15.11.2 Waste management is not currently a focus of the AAP. The creation of new developments could lead to an **increase in the production of waste** from homes and businesses. However, such developments may also present an opportunity to incorporate facilities that **enable easy recycling and waste management**.

16 CONCLUSIONS AT THIS CURRENT STAGE

16.1 Targeted approach to growth

- 16.1.1 Some of the most deprived communities in London live in the Blackhorse Lane area. Pockets of under-used industrial and poor quality environmental land are recognised as reducing the quality of life for residents and for reducing the attractiveness of the area to potential investors. The AAP takes a targeted approach to growth in the area by seeking to prioritise development on these under-utilised and vacant brownfield sites in locations that are on the whole well connected to public transport. In doing so the approach seeks to deliver new housing, business and retail space as a key element of mixed-use schemes in the Opportunity Sites. This approach should contribute significantly to enhancing the attractiveness of the area to inward investors, strengthening the local economy and improving employment opportunities for those that live and work in the area through the delivery of new business and retail space.
- 16.1.2 In the longer term, the delivery of new housing in Blackhorse Lane should provide a positive contribution to the Borough's housing target and housing need. The AAP identifies the need to deliver a mix of unit types (including higher density development close to Blackhorse Lane Station to meet the housing needs of younger people and larger homes further away from the new Neighbourhood Centre to meet the needs of families) and tenure types (including quality affordable homes) that is consistent with housing policies outlined in the Adopted Core Strategy and the Emerging Development Management Policies DPD. This should contribute towards ensuring that a sufficient amount of affordable housing and family homes are delivered within the area.
- 16.1.3 The AAP identifies a need to diversify employment opportunities in the area by promoting a shift away from traditional industries towards the promotion of creative industries through provision of small/medium sized business units. While this approach is expected to have positive effects in terms of generating new employment opportunities it may also have some negative effects in terms of reducing employment opportunities for particular sectors of the community that rely on these businesses.

16.2 Protecting and enhancing the natural and built environment

- 16.2.1 The AAP sets out a number of policy measures that will enhance and protect the area's most precious existing biodiversity assets, including the Walthamstow Wetlands. Policy measures are also included that will increase provision of new green spaces and green infrastructure as part of new developments. This should have significant positive effects on the health and well-being of residents and workers whilst also enhancing the attractiveness of the area to people currently living out with the area.
- 16.2.2 The AAP also recognises the important contribution that a number of unprotected historic buildings make to the area. The AAP has therefore taken an approach which promotes heritage led regeneration which should ensure that such buildings will be incorporated into redevelopment schemes where it is viable to do so.

16.3 Opportunity sites

- 16.3.1 13 opportunity sites are identified within the AAP for a range of uses including housing, employment, business, retail, social infrastructure and green space. The delivery of these sites will contribute towards: meeting housing need, providing employment opportunities; increasing provision of business/commercial spaces; boosting retail provision; enhancing the vitality and viability of the new Neighbourhood Centre; increasing provision of education facilities; and reducing the need to travel. The preferred approach to many of the opportunity sites has been identified subsequent to a careful consideration (informed by SA) of alternative aspirations.

16.4 Overall conclusions

16.4.1 The policies and key opportunity sites brought forward in the AAP will contribute towards tackling key issues present within the Blackhorse Lane Area. New mixed-use developments comprising of residential, retail, business and employment uses will be created to provide new housing and employment opportunities which should contribute to the regeneration of the area. Furthermore, improvements to sustainable transport projects as well as to the public realm should help enhance the vitality and viability of the area. The Council has developed the preferred strategy in light of a detailed understanding of the various issues (sometimes competing) that exist and the implications of alternative approaches that might be taken.

17 RECOMMENDATIONS AT THIS CURRENT STAGE

17.1.1 Only one recommendations is made at this stage. This recommendation will be taken into account when finalising the plan (alongside appraisal findings more generally, and representations received).

Recommendation	To ensure performance of the plan is maximised in terms of ...
<p>Site BHL2: Given the prominence of Site BHL2 South on Blackhorse Road/ Howarden Road, reference could be made to the importance of achieving good 'visual appearance' during the time when the site is used for temporary storage.</p>	<p>Objective 21 - Maintain and enhance the vitality and viability of the Borough's town centres</p>

PART 4: WHAT ARE THE NEXT STEPS (INCLUDING MONITORING)?

18 INTRODUCTION (TO PART 4)

The SA Report must include...

- A description of the measures envisaged concerning monitoring

18.1.1 This Part of the SA Report explains the next steps that will be taken as part of the plan-making / SA process, including in relation to monitoring.

19 PLAN FINALISATION, ADOPTION AND MONITORING

19.1.1 Following consultation the Council may choose (depending on whether any significant issues remain outstanding) to make modifications to the Proposed Submission version of the Plan in light of consultation responses, the findings and recommendations set out within this SA Report or any other new sources of evidence that emerge. The Local Plan will then be submitted to Government for 'Examination in Public'.

19.1.2 At the time of Adoption a 'Statement' must be published that sets out (amongst other things):

- How this SA Report and responses received as part of the current consultation have been taken into account when finalising the plan; and
- Measures decided concerning **monitoring**.

19.1.3 At the current stage (i.e. within the SA Report), there is a need to present 'measures envisaged concerning monitoring' only. As such, set out below are measures that might be taken to monitor development of those sites where the SA has found there to be constraints.

19.1.4 The following is suggested:

- The creation of cycle and pedestrian links and improvements to **public transport** provision are identified as key actions within the AAP. The Council might ideally wish to monitor the transport choices taken by new and existing residents.
- The SA has identified a number of positive impacts in relation to residential development. The amount of new **housing** delivered within the centre could be a focus for monitoring going forward.
- The SA has identified a number of positive impacts in relation to the **local economy and employment**. It will be important to monitor development with a view towards boosting the local economy and creating new job opportunities.
- The importance of good design in order to avoid impacts to **heritage assets** has been identified through this SA. This could be a focus of monitoring going forward.

APPENDIX I: REGULATORY REQUIREMENTS

The Introduction to this SA Report explains that, in order to demonstrate compliance with the requirements of the Environmental Assessment Regulations 2004, SA Reports must answer four questions. Table 1.1 of the Introduction then ‘makes the links’ between requirements of the Regs and these four questions. Table 1.1 is reproduced below (as Table 1). The right-hand column of Table 1 does not quote directly from the Regs, but rather reflects a degree of interpretation. As such, Table 2 explains this interpretation. The following points supplement Table 2.

- References to ‘plan or programme’ have been shortened to ‘plan’.
- Reference to ‘*the environmental protection objectives, established at international, Community or Member State level...*’ is shortened to ‘*the environmental protection objectives, established at international or national level...*’
- The requirement to provide 1) ‘*an outline of the ... relationship [of the plan] with other relevant plans and programmes*’ and 2) ‘*the environmental protection objectives...*’ is taken to mean that a review of the relevant context should be provided.
- The requirement to provide an explanation of ‘*the way [environmental protection] objectives and any environmental considerations have been taken into account during [plan] preparation*’ is taken as indicating that the SA Report must explain how SA has influenced development of the draft plan.
- The reference to issues that might be a focus of SEA is not given prominence. This reflects the fact that these issues are merely suggested; and that a foremost consideration when undertaking SEA should be the fact that the Regulations are of a procedural nature, i.e. do not seek to prescribe substantive issues that should be a focus. These issues are a material consideration nonetheless.
- The need to provide ‘*an outline of the reasons for selecting the alternatives dealt with*’ is taken to have a dual meaning:
 - 1) There is a need to justify the range of alternatives considered (and indeed, the range of issues for which alternatives were considered)
 - 2) There is a need to explain the reasons for selecting preferred alternatives / the preferred approach to addressing each of the key issues in question. This requirement tallies with the requirement to explain ‘*the way [environmental protection] objectives and any environmental considerations have been taken into account during [plan] preparation*’
- The requirement to explain ‘*the likely significant effects...*’ is assumed to relate to both the draft plan and alternatives.
- The reference to providing ‘*a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information*’ is not given prominence. This is purely for reasons of brevity. Methodology is explained where relevant in the report.
- Reference to ‘in accordance with Article 10’ is removed for brevity.
- Finally, it will be noted that references to ‘the environment’ have been retained, despite the fact that the starting assumption that there is a need to give particular attention to environmental issues does not apply to SA.

Table 1: Questions that must be answered within the SA Report

SA REPORT QUESTION	SUB-QUESTION	CORRESPONDING REQUIREMENT (THE REPORT MUST INCLUDE...)
What's the scope of the SA?	What's the Plan seeking to achieve?	<ul style="list-style-type: none"> An outline of the contents and main objectives of the plan
	What's the sustainability 'context'?	<ul style="list-style-type: none"> The relationship of the plan with other relevant plans and programmes The relevant environmental protection objectives, established at international or national level
	What's the sustainability 'baseline' at the current time?	<ul style="list-style-type: none"> The relevant aspects of the current state of the environment The environmental characteristics of areas likely to be significantly affected
	What's the baseline projection?	<ul style="list-style-type: none"> The likely evolution of the current state of the environment without implementation of the plan
	What are the key issues that should be a focus of SA?	<ul style="list-style-type: none"> Any existing environmental problems / issues which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance
What has Plan-making / SA involved up to this point?		<ul style="list-style-type: none"> An outline of the reasons for selecting the alternatives dealt with (and thus an explanation of why the alternatives dealt with are 'reasonable') The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting preferred alternatives / a description of how environmental objectives and considerations are reflected in the draft plan.
What are the appraisal findings at this current stage?		<ul style="list-style-type: none"> The likely significant effects on the environment associated with the draft plan The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan
What happens next (including monitoring)?		<ul style="list-style-type: none"> A description of the measures envisaged concerning monitoring

Table 2: Interpreting regulatory requirements

<u>Interpretation of the requirements (as presented in Table 1, above)</u>	<u>Requirements of Schedule 2 of the Regs (the report must include...)</u>
An outline of the contents, main objectives of the plan	(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;
The relationship of the plan with other relevant plans and programmes	
The environmental protection objectives, established at international or national level, relevant to the plan	(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan
The relevant aspects of the current state of the environment	(c) the environmental characteristics of areas likely to be significantly affected;
The environmental characteristics of areas likely to be significantly affected	(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;
The likely evolution [of the baseline] without implementation of the plan	(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;
Any existing environmental problems / issues which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	
An outline of the reasons for selecting the alternatives dealt with	(f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;
The likely significant effects on the environment' associated with alternatives / An outline of the reasons for selecting preferred alternatives / a description of how environmental objectives and considerations are reflected in the draft plan.	
The likely significant effects on the environment associated with the draft plan	(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;
The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan	(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information
A description of the measures envisaged concerning monitoring	
	(i) a description of the measures envisaged concerning monitoring.

APPENDIX II: ALTERNATIVES APPRAISAL (HOUSING DENSITY)

Introduction

As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising the following alternative area-wide policy approaches to housing density:

1. High density, with a broad mix of unit sizes
2. A mix of densities aimed at different markets

The interim appraisal findings are presented in full within this Appendix. The appraisal table should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Proposed Submission AAP.

Methodology

For each of the alternatives, the appraisal identifies and evaluates 'likely significant effects' on the baseline / likely future baseline, drawing on the sustainability issues identified through scoping (see Part 1 of the main report) as a methodological framework.

Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the alternatives policy approaches under consideration. The ability to predict effects accurately is also limited by understanding of the baseline and (in particular) the future baseline. In light of this, where likely significant effects are predicted this is done with an accompanying explanation of the assumptions made.²¹

In many instances it is not possible to predict significant effects, but it is possible to comment on the merits of alternatives in more general terms. This is helpful, as it enables a distinction to be made between alternatives even where it is not possible to distinguish between them in terms of 'significant effects'.

It is important to note that effects are predicted taking into account the criteria presented within Schedule 2 of the Regs.²² So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered. These effect 'characteristics' are described within the appraisal as appropriate.

The following symbols are used to provide a visual indication of effects:

++	+	-	--	?	~
Significant positive effect on Objective	Positive effect on Objective	Negative effect on Objective	Significant negative effect on Objective	Uncertain effect on Objective due to unknown factors	No effect on Objective

Appraisal findings

Sustainability Objective	Option 1 High density, with a broad mix of unit sizes	Option 2: A mix of densities aimed at different markets
1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	-	+
2. Reduce crime and the fear of crime	~	~
3. Improve standard of health and wellbeing of those who live and work in the Borough	-	+

²¹ As stated by Government Guidance (The Plan Making Manual, see <http://www.pas.gov.uk/pas/core/page.do?pagelD=156210>):

"Ultimately, the significance of an effect is a matter of judgment and should require no more than a clear and reasonable justification."

²² Environmental Assessment of Plans and Programmes Regulations 2004

4. Increase the provision of and access to community facilities to meet local cultural, recreational and social needs	~	~
5. Improve educational attainment in schools	~	~
6. Improve opportunities for access to education and training for all residents	~	~
7. Reduce the overall level of deprivation	~	~
8. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system	-	+
9. Reduce production of waste and increase recycling	~	~
10. Reduce greenhouse gas emissions	-	+
11. Conserve energy	~	~
12. Improve air quality through a reduction in traffic-based emissions	-	+
13. Improve water quality and ensure the efficient use of water resources	~	~
14. Reduce the risk of flooding	~	~
15. Reduce contamination and safeguard soil quality and quantity	~	~
16. Make the best use of previously developed land (PDL) and existing buildings	~	~
17. Conserve and enhance biodiversity	~	~
18. Protect the ecological integrity of Natura 2000 sites	~	~
19. Maintain and enhance the quality of the green belt and open space areas.	-	+
20. Conserve and, where appropriate, enhance the historic environment	~	~
21. Maintain and enhance the vitality and viability of the Borough's town centres	~	~
22. Improve the local economy by attracting inward investment	?	+
23. Maintain stable levels of employment in the Borough	~	~

Summary

(2) performs well in terms of sustainability objectives, particularly because targeting high density housing to areas of high public transport accessibility would support a shift to more sustainable patterns of travel. A mixture of densities is also important from a well-being perspective, given that higher density developments can lead to greater pressures on residential amenity and private and community space.

APPENDIX III: ALTERNATIVES APPRAISAL (AFFORDABLE HOUSING)

Introduction

As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising the following alternative area-wide policy approaches to affordable housing:

1. Maximise on site affordable housing
2. Focus on providing a mixed community

The interim appraisal findings are presented in full within this Appendix. The appraisal table should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Proposed Submission AAP.

Methodology

See Appendix II, above

Appraisal findings

Sustainability Objective	Option 1 Maximise on site affordable housing	Option 2: Focus on providing a mixed community
1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	+	+
2. Reduce crime and the fear of crime	~	~
3. Improve standard of health and wellbeing of those who live and work in the Borough	?	+
4. Increase the provision of and access to community facilities to meet local cultural, recreational and social needs	~	~
5. Improve educational attainment in schools	~	~
6. Improve opportunities for access to education and training for all residents	~	~
7. Reduce the overall level of deprivation	?	+
8. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system	~	~
9. Reduce production of waste and increase recycling	~	~
10. Reduce greenhouse gas emissions	~	~
11. Conserve energy	~	~
12. Improve air quality through a reduction in traffic-based emissions	~	~
13. Improve water quality and ensure the efficient use of water resources	~	~

14. Reduce the risk of flooding	~	~
15. Reduce contamination and safeguard soil quality and quantity	~	~
16. Make the best use of previously developed land (PDL) and existing buildings	~	~
17. Conserve and enhance biodiversity	~	~
18. Protect the ecological integrity of Natura 2000 sites	~	~
19. Maintain and enhance the quality of the green belt and open space areas.	~	~
20. Conserve and, where appropriate, enhance the historic environment	~	~
21. Maintain and enhance the vitality and viability of the Borough's town centres	~	~
22. Improve the local economy by attracting inward investment	~	~
23. Maintain stable levels of employment in the Borough	~	~
<p>Summary</p> <p>(2) performs well from a sustainability perspective as it would ensure that 'new development' (and we assume the recent developments at Paper Mill Place and Unity Works to be a part of this) includes at least 50% affordable housing. The alternative approach (1) would lead to a dominance of affordable housing in these areas, which could lead to unbalanced communities over time.</p>		

APPENDIX IV: ALTERNATIVES APPRAISAL (EMPLOYMENT)

Introduction

As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising the following alternative area-wide policy approaches to employment:

1. Protect existing businesses
2. Incorporate new employment as part of mixed use developments
3. Distinct zones

The interim appraisal findings are presented in full within this Appendix. The appraisal table should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Proposed Submission AAP.

Methodology

See Appendix II, above

Appraisal findings

Sustainability Objective	Option 1 Protect existing businesses	Option 2 Incorporate new employment as part of mixed use developments	Option 3 Distinct zones
1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	~	~	~
2. Reduce crime and the fear of crime	~	~	~
3. Improve standard of health and wellbeing of those who live and work in the Borough	?	+	+
4. Increase the provision of and access to community facilities to meet local cultural, recreational and social needs	~	~	~
5. Improve educational attainment in schools	~	~	~
6. Improve opportunities for access to education and training for all residents	~	~	~
7. Reduce the overall level of deprivation	?	+	+
8. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system	~	~	~
9. Reduce production of waste and increase recycling	~	~	~
10. Reduce greenhouse gas emissions	~	~	~

11. Conserve energy	~	~	~
12. Improve air quality through a reduction in traffic-based emissions	~	~	~
13. Improve water quality and ensure the efficient use of water resources	~	~	~
14. Reduce the risk of flooding	~	~	~
15. Reduce contamination and safeguard soil quality and quantity	~	~	~
16. Make the best use of previously developed land (PDL) and existing buildings	+	?	?
17. Conserve and enhance biodiversity	~	~	~
18. Protect the ecological integrity of Natura 2000 sites	~	~	~
19. Maintain and enhance the quality of the green belt and open space areas.	~	~	~
20. Conserve and, where appropriate, enhance the historic environment	~	~	~
21. Maintain and enhance the vitality and viability of the Borough's town centres	~	~	~
22. Improve the local economy by attracting inward investment	-	+	?
23. Maintain stable levels of employment in the Borough	-	+	+

Summary

Existing industries will perform an important employment function, and it will be important to ensure that sectors of the community that rely on these businesses are not left unable to access suitable employment as a result of the AAP. However, an approach focused on protecting existing businesses (1) would conflict with the objective to deliver a large amount of new housing (which itself is of key importance to the achievement of regeneration aims), given that existing businesses are often not compatible with residential uses.

Refocusing on mixed-use developments with B1 uses (2) would lead to a greater number of employment opportunities locally (i.e. it would be possible to support more jobs per m² of employment floorspace) and it is expected that a mixture of small business would also ensure that local employment is resilient (where as manufacturing is more likely to decline). Another important consideration is that mixed use development will be supportive of efforts to incorporate district heating.

Approach (3) could perform well, but it is not possible to draw conclusions on the sustainability merits of this approach without knowing more about the approach to zoning that would be implemented.

APPENDIX V: ALTERNATIVES APPRAISAL (NEIGHBOURHOOD CENTRES)

Introduction

As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising the following alternative area-wide policy approaches to neighbourhood centres:

1. Offer guidance on appropriate uses and sizes
2. A flexible approach to town centre uses

The interim appraisal findings are presented in full within this Appendix. The appraisal table should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Proposed Submission AAP.

Methodology

See Appendix II, above

Appraisal findings

Sustainability Objective	Option 1 Offer guidance on appropriate uses and sizes	Option 2 A flexible approach to town centre uses
1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	~	~
2. Reduce crime and the fear of crime	~	~
3. Improve standard of health and wellbeing of those who live and work in the Borough	+	?
4. Increase the provision of and access to community facilities to meet local cultural, recreational and social needs	+	?
5. Improve educational attainment in schools	~	~
6. Improve opportunities for access to education and training for all residents	~	~
7. Reduce the overall level of deprivation	~	~
8. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system	+	?
9. Reduce production of waste and increase recycling	~	~
10. Reduce greenhouse gas emissions	+	?
11. Conserve energy	~	~
12. Improve air quality through a reduction in traffic-based emissions	+	?

13. Improve water quality and ensure the efficient use of water resources	~	~
14. Reduce the risk of flooding	~	~
15. Reduce contamination and safeguard soil quality and quantity	~	~
16. Make the best use of previously developed land (PDL) and existing buildings	~	~
17. Conserve and enhance biodiversity	~	~
18. Protect the ecological integrity of Natura 2000 sites	~	~
19. Maintain and enhance the quality of the green belt and open space areas.	~	~
20. Conserve and, where appropriate, enhance the historic environment	~	~
21. Maintain and enhance the vitality and viability of the Borough's town centres	+	?
22. Improve the local economy by attracting inward investment	?	+
23. Maintain stable levels of employment in the Borough	~	~
<p>Summary</p> <p>Alternative (1) would help to ensure that the Neighbourhood Centre does not have any unforeseen negative sustainability effects. In particular, it would be possible to ensure that the retail and leisure offer does not conflict with that of Walthamstow Town Centre. A hierarchy of centres is important from a perspective of minimising the need to travel, ensuring that day to day needs are available within walking distance and comparison shopping can be undertaken in centres that are accessible by public transport. Alternative (1) would also be supportive of efforts to maximise the 'wider-benefits' of a neighbourhood centre. In particular, it would likely ensure that a mix of uses comes forward that supports the development of a 'hub of activity'.</p> <p>It might be suggested that the approach suggested through Alternative (1) could constrain investment. However, it is not likely that this effect will be significant, given that a broad range of uses will be permitted.</p> <p>Regarding (2), this approach essentially represents 'business as usual', and hence it is the case that the opportunities for sustainability benefits (as described above) would be missed.</p>		

APPENDIX VI: ALTERNATIVES APPRAISAL (DESIGN AND LOCAL CHARACTER)

Introduction

As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising the following alternative area-wide policy approaches to design and local character:

1. Create a new character
2. Incorporate existing buildings of merit

The interim appraisal findings are presented in full within this Appendix. The appraisal table should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Proposed Submission AAP.

Methodology

See Appendix II, above

Appraisal findings

Sustainability Objective	Option 1 Create a new character	Option 2 Incorporate existing buildings of merit
1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	~	~
2. Reduce crime and the fear of crime	+	~
3. Improve standard of health and wellbeing of those who live and work in the Borough	+	~
4. Increase the provision of and access to community facilities to meet local cultural, recreational and social needs	~	~
5. Improve educational attainment in schools	~	~
6. Improve opportunities for access to education and training for all residents	~	~
7. Reduce the overall level of deprivation	+	~
8. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system	~	~
9. Reduce production of waste and increase recycling	~	~
10. Reduce greenhouse gas emissions	~	~
11. Conserve energy	~	~
12. Improve air quality through a reduction in traffic-based emissions	~	~

13. Improve water quality and ensure the efficient use of water resources	~	~
14. Reduce the risk of flooding	~	~
15. Reduce contamination and safeguard soil quality and quantity	~	~
16. Make the best use of previously developed land (PDL) and existing buildings	?	+
17. Conserve and enhance biodiversity	+	~
18. Protect the ecological integrity of Natura 2000 sites	?	~
19. Maintain and enhance the quality of the green belt and open space areas.	+	~
20. Conserve and, where appropriate, enhance the historic environment	~	+
21. Maintain and enhance the vitality and viability of the Borough's town centres	~	~
22. Improve the local economy by attracting inward investment	+	+
23. Maintain stable levels of employment in the Borough	~	~
<p>Summary</p> <p>Creating a new character for the Blackhorse Lane area (1) would make it possible to better capitalise on locational opportunities. In particular, it would be possible to better capitalise on the proximity to the Lee Valley Regional Park and Walthamstow Marshes. Through development, it would be possible to further develop the 'natural signature' of the area. It would also be possible to capitalise on opportunities for supporting greater walking, cycling and use of public transport.</p> <p>In addition, 'Creating a new character' would help to address some existing local problems. In particular, the built-up area is quite 'grey', without well integrated greenspace. Improving the built environment and the public realm would likely result in a general improvement to the image of the area. It is not expected that (1) would have any significant negative effects in terms of SA objectives.</p> <p>Approach (2) does also have merit, given that a number of existing buildings in the area do make a positive contribution to local character. Existing buildings can provide a useful link to the past that gives an area its unique sense of place and identity.</p>		

APPENDIX VII: ALTERNATIVES APPRAISAL (PUBLIC OPEN SPACE AND NATURE CONSERVATION)

Introduction

As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising the following alternative area-wide policy approaches to public open space and nature conservation:

1. Create new open spaces
2. Improve access to existing open spaces
3. An integrated approach

The interim appraisal findings are presented in full within this Appendix. The appraisal table should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Proposed Submission AAP.

Methodology

See Appendix II, above

Appraisal findings

Sustainability Objective	Option 1 Create new open spaces	Option 2 Improve access to existing open spaces	Option 3 An integrated approach
1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	-	+	~
2. Reduce crime and the fear of crime	~	~	~
3. Improve standard of health and wellbeing of those who live and work in the Borough	+	++	++
4. Increase the provision of and access to community facilities to meet local cultural, recreational and social needs	~	~	~
5. Improve educational attainment in schools	~	+	~
6. Improve opportunities for access to education and training for all residents	~	~	~
7. Reduce the overall level of deprivation	~	~	~
8. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system	~	~	~
9. Reduce production of waste and increase recycling	~	~	~
10. Reduce greenhouse gas emissions	~	~	~

11. Conserve energy	~	~	~
12. Improve air quality through a reduction in traffic-based emissions	~	~	~
13. Improve water quality and ensure the efficient use of water resources	~	~	~
14. Reduce the risk of flooding	+	+	+
15. Reduce contamination and safeguard soil quality and quantity	~	~	~
16. Make the best use of previously developed land (PDL) and existing buildings	~	~	~
17. Conserve and enhance biodiversity	+	?	+
18. Protect the ecological integrity of Natura 2000 sites	+	?	+
19. Maintain and enhance the quality of the green belt and open space areas.	++	+	++
20. Conserve and, where appropriate, enhance the historic environment	?	+	?
21. Maintain and enhance the vitality and viability of the Borough's town centres	~	~	~
22. Improve the local economy by attracting inward investment	+	+	+
23. Maintain stable levels of employment in the Borough	~	~	~

Summary

Walthamstow Wetlands are an exceptional and extensive blue/green asset. Therefore, the local population would benefit greatly from increased access (2), particularly in terms of 'health and wellbeing'. It is also likely that access to these important natural assets would add to local sense of place and heritage. Capitalising on these important local assets would help to attract residents and businesses.

By increasing access to existing open spaces (2) there would be the potential for increased recreational disturbance to sensitive habitats and wildlife. However, this effect is uncertain, and it is likely that any potential effects would be avoided or sufficiently mitigated.

An approach focused on creating new open spaces (1) would also have a positive effect, but benefits would possibly not be of the same magnitude due to the likely difficulties in creating habitat that is of the same quality as the Walthamstow Wetlands. A particular benefit of (1) is that it would potentially help to reduce the 'urban heat island' effect. New open spaces can also provide a buffer between sources of pollution and sensitive receptors.

An approach that seeks to deliver both increased access and the new open space within the built-up area (3) would most likely avoid any risk of recreational disturbance.

APPENDIX VIII: ALTERNATIVES APPRAISAL (FLOOD RISK)

Introduction

As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising the following alternative area-wide policy approaches to flood risk:

1. Avoid new development in flood risk areas
2. Only less vulnerable uses should be allowed in flood risk areas
3. New developments should be seen as an opportunity to minimise existing flood risk

The interim appraisal findings are presented in full within this Appendix. The appraisal table should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Proposed Submission AAP.

Methodology

See Appendix II, above

Appraisal findings

Sustainability Objective	Option 1 Avoid new development in flood risk areas	Option 2 Only less vulnerable uses should be allowed in flood risk areas	Option 3 New development should be seen as an opportunity to minimise existing flood risk
1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	-	-	+
2. Reduce crime and the fear of crime	~	~	~
3. Improve standard of health and wellbeing of those who live and work in the Borough	~	~	~
4. Increase the provision of and access to community facilities to meet local cultural, recreational and social needs	~	~	~
5. Improve educational attainment in schools	~	~	~
6. Improve opportunities for access to education and training for all residents	~	~	~
7. Reduce the overall level of deprivation	-	?	+
8. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system	~	~	~
9. Reduce production of waste and increase recycling	~	~	~

10. Reduce greenhouse gas emissions	~	~	~
11. Conserve energy	~	~	~
12. Improve air quality through a reduction in traffic-based emissions	~	~	~
13. Improve water quality and ensure the efficient use of water resources	~	~	~
14. Reduce the risk of flooding	+	+	+
15. Reduce contamination and safeguard soil quality and quantity	~	~	~
16. Make the best use of previously developed land (PDL) and existing buildings	~	~	~
17. Conserve and enhance biodiversity	~	~	+
18. Protect the ecological integrity of Natura 2000 sites	~	~	~
19. Maintain and enhance the quality of the green belt and open space areas.	~	~	~
20. Conserve and, where appropriate, enhance the historic environment	~	~	~
21. Maintain and enhance the vitality and viability of the Borough's town centres	~	~	~
22. Improve the local economy by attracting inward investment	~	~	~
23. Maintain stable levels of employment in the Borough	~	~	~
Summary All options could effectively avoid flood risk. However, (1) and (2) would restrict development, and so could potentially hinder the regeneration of the Blackhorse Lane Area.			

APPENDIX IX: ALTERNATIVES APPRAISAL (TRANSPORT)

Introduction

As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising the following alternative area-wide policy approaches to transport:

1. Predict and provide for road traffic
2. Prioritise sustainable transport

The interim appraisal findings are presented in full within this Appendix. The appraisal table should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Proposed Submission AAP.

Methodology

See Appendix II, above

Appraisal findings

Sustainability Objective	Option 1 Predict and provide for road traffic	Option 2 Prioritise sustainable transport
1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	~	~
2. Reduce crime and the fear of crime	~	~
3. Improve standard of health and wellbeing of those who live and work in the Borough	-	+
4. Increase the provision of and access to community facilities to meet local cultural, recreational and social needs	~	~
5. Improve educational attainment in schools	~	~
6. Improve opportunities for access to education and training for all residents	~	~
7. Reduce the overall level of deprivation	~	~
8. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system	-	+
9. Reduce production of waste and increase recycling	~	~
10. Reduce greenhouse gas emissions	-	+
11. Conserve energy	~	~
12. Improve air quality through a reduction in traffic-based emissions	-	+
13. Improve water quality and ensure the efficient use of water resources	~	~
14. Reduce the risk of flooding	~	~

15. Reduce contamination and safeguard soil quality and quantity	~	~
16. Make the best use of previously developed land (PDL) and existing buildings	~	~
17. Conserve and enhance biodiversity	~	~
18. Protect the ecological integrity of Natura 2000 sites	~	~
19. Maintain and enhance the quality of the green belt and open space areas.	~	~
20. Conserve and, where appropriate, enhance the historic environment	~	~
21. Maintain and enhance the vitality and viability of the Borough's town centres	~	~
22. Improve the local economy by attracting inward investment	~	+
23. Maintain stable levels of employment in the Borough	~	~
<p>Summary</p> <p>One of the major strengths of the area is its transport links. However, there is the potential to further capitalise on this strength. (2) seeks to achieve this by supporting walking and cycling and priority bus routes. Reducing travel by private car would result in benefits in terms of several sustainability objectives. Furthermore, encouraging walking and cycling can have health benefits for resident's and also improve road safety.</p> <p>It might be suggested that hindering access to the area by private car (2) could have negative effects on local businesses. However, in the long term the effects would likely be beneficial given that, without measures to curb car use (1), traffic congestion would worsen over time.</p>		

APPENDIX X: ALTERNATIVES APPRAISAL (SOCIAL INFRASTRUCTURE)

Introduction

As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising the following alternative area-wide policy approaches to social infrastructure:

1. Aim to provide all forms of social infrastructure
2. Prioritise new education and health facilities

The interim appraisal findings are presented in full within this Appendix. The appraisal table should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Proposed Submission AAP.

Methodology

See Appendix II, above

Appraisal findings

Sustainability Objective	Option 1 Aim to provide all forms of social infrastructure	Option 2 Prioritise new education and health facilities
1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	-	+
2. Reduce crime and the fear of crime	~	~
3. Improve standard of health and wellbeing of those who live and work in the Borough	?	+
4. Increase the provision of and access to community facilities to meet local cultural, recreational and social needs	?	?
5. Improve educational attainment in schools	?	+
6. Improve opportunities for access to education and training for all residents	?	?
7. Reduce the overall level of deprivation	?	+
8. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system	~	~
9. Reduce production of waste and increase recycling	~	~
10. Reduce greenhouse gas emissions	~	~
11. Conserve energy	~	~
12. Improve air quality through a reduction in traffic-based emissions	~	~

13. Improve water quality and ensure the efficient use of water resources	~	~
14. Reduce the risk of flooding	~	~
15. Reduce contamination and safeguard soil quality and quantity	~	~
16. Make the best use of previously developed land (PDL) and existing buildings	~	~
17. Conserve and enhance biodiversity	~	~
18. Protect the ecological integrity of Natura 2000 sites	~	~
19. Maintain and enhance the quality of the green belt and open space areas.	~	~
20. Conserve and, where appropriate, enhance the historic environment	~	~
21. Maintain and enhance the vitality and viability of the Borough's town centres	~	~
22. Improve the local economy by attracting inward investment	-	+
23. Maintain stable levels of employment in the Borough	~	~
<p>Summary</p> <p>Good access to social infrastructure will be of central importance to effective regeneration. (1) aims to provide all forms of social infrastructure. However, there is a risk that the cost of this provision could deter new development, and hence hinder regeneration with wide ranging sustainability implications. (2) draws on evidence to identify new education and health facilities as social infrastructure priorities.</p>		

APPENDIX XI: ALTERNATIVES APPRAISAL (STATION HUB AND WATERFRONT SITE)

Introduction

As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising the following alternative approaches to developing the Station Hub and Waterfront Site:

- 1) Mixed use incorporating 1000 residential units, 4550m² commercial space, linear park and public open spaces
- 2) Retain existing industrial uses
- 3) Mixed use incorporating a new waterfront park with high density residential, retail along Forest Road frontage, and a new road through the site linking Forest Road to Priestley Way

The interim appraisal findings are presented in full within this Appendix. The appraisal table should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Proposed Submission AAP.

Methodology

See Appendix II, above

Appraisal findings

	Option 1	Option 2	Option 3
Sustainability Objective	Mixed use incorporating 1000 residential units, 4550m ² commercial space, linear park and public open spaces	Retain existing industrial uses	Mixed use incorporating a new waterfront park with high density residential, retail along Forest Road frontage, and a new road through the site
1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	+	~	+
2. Reduce crime and the fear of crime	~	~	~
3. Improve standard of health and wellbeing of those who live and work in the Borough	+	~	+
4. Increase the provision of and access to community facilities to meet local cultural, recreational and social needs	+	~	~
5. Improve educational attainment in schools	~	~	~

6. Improve opportunities for access to education and training for all residents	~	~	~
7. Reduce the overall level of deprivation	+	~	+
8. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system	+	~	-
9. Reduce production of waste and increase recycling	~	~	~
10. Reduce greenhouse gas emissions	+	~	-
11. Conserve energy	~	~	~
12. Improve air quality through a reduction in traffic-based emissions	+	~	-
13. Improve water quality and ensure the efficient use of water resources	~	~	~
14. Reduce the risk of flooding	~	~	~
15. Reduce contamination and safeguard soil quality and quantity	~	~	~
16. Make the best use of previously developed land (PDL) and existing buildings	+	-	+
17. Conserve and enhance biodiversity	?	~	?
18. Protect the ecological integrity of Natura 2000 sites	?	~	?
19. Maintain and enhance the quality of the green belt and open space areas.	+	~	~
20. Conserve and, where appropriate, enhance the historic environment	?	~	?
21. Maintain and enhance the vitality and viability of the Borough's town centres	+	-	?
22. Improve the local economy by attracting inward investment	+	~	+
23. Maintain stable levels of employment in the Borough	+	+	~

Summary

(1) would enable a more efficient use of the land which would result in the removal of the car park and the creation of a mixed use development incorporating new housing, commercial and business units and a range of social infrastructure, in a prominent location with good public transport connections. This option should help support the AAP's objective of creating a vibrant and viable neighbourhood centre for Blackhorse Lane. The mixed-use approach of this option would therefore be likely to have a number of positive effects in terms of the housing, air quality, human health and transport related objectives.

Given the prominent location of the site and the opportunities that the site could bring in terms of enhancing this area of Blackhorse Lane, the site's existing use (2) does not create an efficient use of the land. Maintaining the status quo at this site would therefore be unlikely to result in many positive effects in terms of the sustainability objectives.

(3) would have a number of positive effects by helping to meet local housing need and the mix of housing and retail would make more efficient use of the land than option (2). This option would also result in enhancements being made to the quality of open space through the creation of a waterfront park although the benefits of this would be restricted to the occupiers of the development plots rather than the wider community. The construction of a new road through the site would encourage traffic to pass through it which would not make a positive contribution to the quality of the public realm; as a result, this option would be likely to have some negative effects in terms of the air quality, human health and transport related objectives.

APPENDIX XII: ALTERNATIVES APPRAISAL (CAR WASH AND GARAGE SITE)

Introduction

As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising the following alternative approaches to developing the Car Wash and Garage Site:

- 1) Mixed use with 1500m² commercial/social infrastructure and 50 residential units
- 2) Retain as existing
- 3) 100% residential scheme

The interim appraisal findings are presented in full within this Appendix. The appraisal table should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Proposed Submission AAP.

Methodology

See Appendix II, above

Appraisal findings

Sustainability Objective	Option 1 Mixed use with 1500m ² commercial/social infrastructure and 50 residential units	Option 2 Retain as existing	Option 3 100% residential scheme
1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	+	~	+
2. Reduce crime and the fear of crime	~	~	~
3. Improve standard of health and wellbeing of those who live and work in the Borough	+	~	-
4. Increase the provision of and access to community facilities to meet local cultural, recreational and social needs	+	~	~
5. Improve educational attainment in schools	~	~	~
6. Improve opportunities for access to education and training for all residents	~	~	~
7. Reduce the overall level of deprivation	+	~	+
8. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system	+	~	~
9. Reduce production of waste and increase recycling	~	~	~

10. Reduce greenhouse gas emissions	+	-	+
11. Conserve energy	~	~	~
12. Improve air quality through a reduction in traffic-based emissions	+	-	+
13. Improve water quality and ensure the efficient use of water resources	~	~	~
14. Reduce the risk of flooding	~	~	~
15. Reduce contamination and safeguard soil quality and quantity	~	~	~
16. Make the best use of previously developed land (PDL) and existing buildings	+	-	+
17. Conserve and enhance biodiversity	+	~	~
18. Protect the ecological integrity of Natura 2000 sites	?	~	?
19. Maintain and enhance the quality of the green belt and open space areas.	+	~	~
20. Conserve and, where appropriate, enhance the historic environment	~	~	~
21. Maintain and enhance the vitality and viability of the Borough's town centres	+	~	+
22. Improve the local economy by attracting inward investment	+	~	+
23. Maintain stable levels of employment in the Borough	~	~	~
<p>Summary</p> <p>(1) would intensify and make good use of the site which provides a major gateway into the borough by providing residential units on the upper floors and commercial/social infrastructure on the ground floor resulting in an active street frontage. A focus on small retail and small business uses would also help to ensure that a local centre develops that sits within the exiting desired hierarchy of local centres and town centres in the borough. Some existing uses will be lost, but it is thought that this is generally acceptable, given that the area as a whole is currently not meeting its potential as a local centre. Higher density mixed use development at this site would help to ensure housing needs are met in a location that benefits from excellent public transport links and should help encourage walking and cycling. This option would also enable residents to benefit from proximity to Walthamstow Wetlands which should lead to health and well-being benefits.</p> <p>(2) would result in the continued inefficient use of this prominent site; in particular this option would not have any positive effects in terms of increasing housing provision in a well-connected site.</p> <p>(3) would have some positive effects in terms of helping to meet local housing need. Provision of housing on the ground floor at this location could however result in negative effects for residents in terms of their health and well-being as a result of noise and bad air quality associated with heavy traffic on Forest Road.</p>			

APPENDIX XIII: ALTERNATIVES APPRAISAL (BLACKHORSE ROAD/ HAWARDEN ROAD SITE)

Introduction

As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising the following alternative approaches to developing the Blackhorse Road/ Hawarden Road Site:

- 1) Secondary school
- 2) High density residential

The interim appraisal findings are presented in full within this Appendix. The appraisal table should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Proposed Submission AAP.

Methodology

See Appendix II, above

Appraisal findings

Sustainability Objective	Option 1 Secondary school	Option 2 High density residential
1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	~	+
2. Reduce crime and the fear of crime	~	~
3. Improve standard of health and wellbeing of those who live and work in the Borough	~	+
4. Increase the provision of and access to community facilities to meet local cultural, recreational and social needs	~	~
5. Improve educational attainment in schools	+ (in the long term)	~
6. Improve opportunities for access to education and training for all residents	+ (in the long term)	-
7. Reduce the overall level of deprivation	~	+
8. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system	~	~
9. Reduce production of waste and increase recycling	~	~
10. Reduce greenhouse gas emissions	~	~
11. Conserve energy	~	~
12. Improve air quality through a reduction in traffic-based emissions	~	~
13. Improve water quality and ensure the efficient use of water resources	~	~

14. Reduce the risk of flooding	~	~
15. Reduce contamination and safeguard soil quality and quantity	~	~
16. Make the best use of previously developed land (PDL) and existing buildings	+	+
	(in the long term)	
17. Conserve and enhance biodiversity	~	~
18. Protect the ecological integrity of Natura 2000 sites	~	~
19. Maintain and enhance the quality of the green belt and open space areas.	~	~
20. Conserve and, where appropriate, enhance the historic environment	~	~
21. Maintain and enhance the vitality and viability of the Borough's town centres	~	~
22. Improve the local economy by attracting inward investment	+	+
	(in the long term)	
23. Maintain stable levels of employment in the Borough	~	~
<p>Summary</p> <p>This is the Council's preferred long term option for the site and would provide a number of sustainability benefits particularly in terms of giving local children access to education in a location that benefits from proximity to good public transport provision. Given that the site is currently vacant, by bringing the site back into use, (1) would make more efficient use of the land. In the short term this option would involve encouraging the site to be used for storage purposes. This seems to be an appropriate temporary use for the site as although not being an appropriate long term use for the site, it would help to bring the site back into use in the short term while ensuring that the Council's long term aspirations for it are not hindered.</p> <p>(2) would also result in efficient use of the land by bringing it back into use and would have several positive effects in terms of contributing to local housing targets. However this approach would increase local demand for school places and could potentially result in the demand for a new school in a well-connected location not being met.</p>		

APPENDIX XIV: ALTERNATIVES APPRAISAL (WILLOWFIELDS SCHOOL SITE)

Introduction

As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising the following alternative approaches to developing the Willowfields School Site:

- 1) Convert to primary school
- 2) Retain as secondary school
- 3) Redevelop for residential

The interim appraisal findings are presented in full within this Appendix. The appraisal table should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Proposed Submission AAP.

Methodology

See Appendix II, above

Appraisal findings

Sustainability Objective	Option 1 Convert to primary school	Option 2 Retain as secondary school	Option 3 Redevelop for residential
1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	~	~	+
2. Reduce crime and the fear of crime	~	~	~
3. Improve standard of health and wellbeing of those who live and work in the Borough	~	~	~
4. Increase the provision of and access to community facilities to meet local cultural, recreational and social needs	+	~	~
5. Improve educational attainment in schools	+	~	~
6. Improve opportunities for access to education and training for all residents	+	-	-
7. Reduce the overall level of deprivation	~	~	+
8. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system	~	~	~
9. Reduce production of waste and increase recycling	~	~	~
10. Reduce greenhouse gas emissions	~	~	~
11. Conserve energy	~	~	~

12. Improve air quality through a reduction in traffic-based emissions	~	~	~
13. Improve water quality and ensure the efficient use of water resources	~	~	~
14. Reduce the risk of flooding	~	~	~
15. Reduce contamination and safeguard soil quality and quantity	~	~	~
16. Make the best use of previously developed land (PDL) and existing buildings	+	-	~
17. Conserve and enhance biodiversity	~	~	~
18. Protect the ecological integrity of Natura 2000 sites	~	~	~
19. Maintain and enhance the quality of the green belt and open space areas.	~	~	~
20. Conserve and, where appropriate, enhance the historic environment	~	~	~
21. Maintain and enhance the vitality and viability of the Borough's town centres	~	~	+
22. Improve the local economy by attracting inward investment	+	~	+
23. Maintain stable levels of employment in the Borough	~	~	~

Summary

This site is currently used as a secondary school however it is operating at capacity and the size of the site means there is little scope for it to be expanded. (1) would offer a good use of the site as it would result in the development of a new primary school that would help meet the demands for primary school places from the surrounding residential area.

As the site is currently operating at capacity and cannot be expanded, (2) would not offer a good use of the land as it would not help to address the demand for school places.

(3) would contribute to housing targets and would therefore have positive effects in terms of addressing local housing need. However development of this site for residential use would further increase pressure on schools in the area that are already operating at capacity.

APPENDIX XV: ALTERNATIVES APPRAISAL (SUTHERLAND ROAD SITES)

Introduction

As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising the following alternative approaches to developing the Sutherland Road Sites:

- 1) BHL4 North – Mixed use development including 150 residential units, 2000m² business space and health centre. BHL5 – Residential development of 323 units. BHL6 – Mixed use development including 235 residential units, 786m² B1 artisan workshops, 1099m² retail space, highway alterations, energy centre and new public realm works, landscaping and car parking.
- 2) Consolidating business uses into site BHL6 as a new business park and redeveloping BHL4 North and BHL5 for residential

The interim appraisal findings are presented in full within this Appendix. The appraisal table should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Proposed Submission AAP.

Methodology

See Appendix II, above

Appraisal findings

Sustainability Objective	Option 1 Mixed use development on sites BHL4 North and BHL6, residential development of 323 units on site BHL5	Option 2 Consolidating business uses into site BHL6 as a new business park and redeveloping BHL4 North and BHL5 for residential
1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	+	+
2. Reduce crime and the fear of crime	~	~
3. Improve standard of health and wellbeing of those who live and work in the Borough	+	~
4. Increase the provision of and access to community facilities to meet local cultural, recreational and social needs	+	~
5. Improve educational attainment in schools	~	~
6. Improve opportunities for access to education and training for all residents	~	~
7. Reduce the overall level of deprivation	~	~

8. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system	+	~
9. Reduce production of waste and increase recycling	~	~
10. Reduce greenhouse gas emissions	+	?
11. Conserve energy	~	~
12. Improve air quality through a reduction in traffic-based emissions	+	?
13. Improve water quality and ensure the efficient use of water resources	~	~
14. Reduce the risk of flooding	~	~
15. Reduce contamination and safeguard soil quality and quantity	~	~
16. Make the best use of previously developed land (PDL) and existing buildings	+	?
17. Conserve and enhance biodiversity	~	~
18. Protect the ecological integrity of Natura 2000 sites	~	~
19. Maintain and enhance the quality of the green belt and open space areas.	~	~
20. Conserve and, where appropriate, enhance the historic environment	~	-
21. Maintain and enhance the vitality and viability of the Borough's town centres	~	~
22. Improve the local economy by attracting inward investment	+	+
23. Maintain stable levels of employment in the Borough	+	?

Summary

(1) would result in the creation of a mix of uses across the three sites which would make a positive contribution in terms of enhancing the local area and would create a more efficient use of the land than the present situation. This option would protect the existing traditional employment uses on site that are considered compatible with residential use, including Dunhills, an employer of skilled craftsmen, but would result in the loss of some existing industrial uses that are less compatible with residential uses. Both options would have positive effects in terms of contributing to local housing need.

(2) would result in a 'zoning' approach to development which would involve the creation of two residential sites and a business park which in turn would not contribute to the creation of a mixed use community in the area. This approach would be likely to have positive effects in terms of attracting new investors to the area however it would also result in the removal of a number of traditional workshops which are of some built heritage which in turn would result in the loss of jobs in the traditional industries.

APPENDIX XVI: ALTERNATIVES APPRAISAL (SUTHERLAND ROAD SITE - BHL4 SOUTH)

Introduction

As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising the following alternative approaches to developing the Sutherland Road Site - BHL4 South:

- 1) Mixed use development including 200 residential units, 2700m² new B1 business space, and retained community outreach facility
- 2) Retain existing buildings for employment use

The interim appraisal findings are presented in full within this Appendix. The appraisal table should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Proposed Submission AAP.

Methodology

See Appendix II, above

Appraisal findings

Sustainability Objective	Option 1 Mixed use development including 200 residential units, 2700m ² new B1 business space, and retained community outreach facility	Option 2 Retain existing buildings for employment use
1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	+	~
2. Reduce crime and the fear of crime	~	~
3. Improve standard of health and wellbeing of those who live and work in the Borough	~	~
4. Increase the provision of and access to community facilities to meet local cultural, recreational and social needs	+	~
5. Improve educational attainment in schools	~	~
6. Improve opportunities for access to education and training for all residents	~	~
7. Reduce the overall level of deprivation	~	~
8. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system	~	-

9. Reduce production of waste and increase recycling	~	~
10. Reduce greenhouse gas emissions	~	~
11. Conserve energy	~	~
12. Improve air quality through a reduction in traffic-based emissions	~	~
13. Improve water quality and ensure the efficient use of water resources	~	~
14. Reduce the risk of flooding	~	~
15. Reduce contamination and safeguard soil quality and quantity	~	~
16. Make the best use of previously developed land (PDL) and existing buildings	+	~
17. Conserve and enhance biodiversity	~	~
18. Protect the ecological integrity of Natura 2000 sites	~	~
19. Maintain and enhance the quality of the green belt and open space areas.	~	~
20. Conserve and, where appropriate, enhance the historic environment	~	~
21. Maintain and enhance the vitality and viability of the Borough's town centres	~	~
22. Improve the local economy by attracting inward investment	+	~
23. Maintain stable levels of employment in the Borough	+	~

Summary

(1) would create a significant shift away from existing industrial employment uses towards business uses for the creative industries. This has the advantage of making better use of the land than option 2 through the creation of new business space that is more compatible with the surrounding residential uses. The provision of new units should help to attract investment to the area and improve the local economy. This option also has the advantage of helping to meet local housing need on a key site on Sutherland Road and would have positive effects in terms of the health and well-being and access to community facility objectives through retaining the existing community outreach facility. However this option may also have some negative effects by reducing a small number of important local employment opportunities in the traditional industries.

(2) would have the advantage of safeguarding existing employment in the traditional industries; however there are a number of vacant units on the site which suggests that this option is not currently making the most efficient use of the land. This option would also not contribute to local housing need and would not address the existing layout of the site which contributes to poor pedestrian and cycle connections in the surrounding area.

APPENDIX XVII: ALTERNATIVES APPRAISAL (BILLET WORKS SITE)

Introduction

As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising the following alternative approaches to developing the Billet Works Site:

- 1) Mixed use development including 344 residential units, retail, office and community space, car parking spaces, cycle provision and amenity space.
- 2) High density mixed use development including 500+ new homes.

The interim appraisal findings are presented in full within this Appendix. The appraisal table should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Proposed Submission AAP.

Methodology

See Appendix II, above

Appraisal findings

Sustainability Objective	Option 1 Mixed use development including 344 residential units, retail, office and community space, car parking spaces, cycle provision and amenity space	Option 2 High density mixed use development including 500+ new homes
1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	+	+
2. Reduce crime and the fear of crime	~	~
3. Improve standard of health and wellbeing of those who live and work in the Borough	~	~
4. Increase the provision of and access to community facilities to meet local cultural, recreational and social needs	+	+
5. Improve educational attainment in schools	~	~
6. Improve opportunities for access to education and training for all residents	~	~
7. Reduce the overall level of deprivation	+	+
8. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system	+	?

9. Reduce production of waste and increase recycling	~	~
10. Reduce greenhouse gas emissions	+	?
11. Conserve energy	~	~
12. Improve air quality through a reduction in traffic-based emissions	+	?
13. Improve water quality and ensure the efficient use of water resources	~	~
14. Reduce the risk of flooding	~	~
15. Reduce contamination and safeguard soil quality and quantity	~	~
16. Make the best use of previously developed land (PDL) and existing buildings	+	+
17. Conserve and enhance biodiversity	~	~
18. Protect the ecological integrity of Natura 2000 sites	~	~
19. Maintain and enhance the quality of the green belt and open space areas.	~	~
20. Conserve and, where appropriate, enhance the historic environment	~	~
21. Maintain and enhance the vitality and viability of the Borough's town centres	~	~
22. Improve the local economy by attracting inward investment	+	+
23. Maintain stable levels of employment in the Borough	+	+

Summary

(1) has the advantage of making better use of a currently underused site by providing a mixed use development in an area that is designated for regeneration. This option would have positive effects in terms of enhancing the attractiveness of the area to potential investors and in helping to address local housing need. This option would also result in provision of community and retail facilities in an area of Blackhorse Lane that is currently less well served by public transport than other sites.

(2) would also provide housing which would help address local housing need. This option would not perform as well as option 1 from a sustainability perspective given that higher density development is best targeted to the Station Hub area, where there is better public transport accessibility.

APPENDIX XVIII: ALTERNATIVES APPRAISAL (152/154 BLACKHORSE ROAD SITE)

Introduction

As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising the following alternative approaches to developing the 152/154 Blackhorse Road Site:

- 1) Mixed use development including ground floor commercial units, 40 residential units and social infrastructure.
- 2) Retain as existing (offices and building yard).
- 3) 100% residential scheme.

The interim appraisal findings are presented in full within this Appendix. The appraisal table should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Proposed Submission AAP.

Methodology

See Appendix II, above

Appraisal findings

Sustainability Objective	Option 1 Mixed use development including ground floor commercial units, 40 residential units and potential social infrastructure	Option 2 Retain as existing (offices and building yard)	Option 3 100% residential scheme
1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	+	~	+
2. Reduce crime and the fear of crime	~	~	~
3. Improve standard of health and wellbeing of those who live and work in the Borough	+	~	~
4. Increase the provision of and access to community facilities to meet local cultural, recreational and social needs	+	~	~
5. Improve educational attainment in schools	~	~	~
6. Improve opportunities for access to education and training for all residents	~	~	~

7. Reduce the overall level of deprivation	~	~	~
8. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system	+	~	~
9. Reduce production of waste and increase recycling	~	~	~
10. Reduce greenhouse gas emissions	+	~	+
11. Conserve energy	~	~	~
12. Improve air quality through a reduction in traffic-based emissions	+	~	+
13. Improve water quality and ensure the efficient use of water resources	~	~	~
14. Reduce the risk of flooding	~	~	~
15. Reduce contamination and safeguard soil quality and quantity	~	~	~
16. Make the best use of previously developed land (PDL) and existing buildings	?	~	?
17. Conserve and enhance biodiversity	~	~	~
18. Protect the ecological integrity of Natura 2000 sites	~	~	~
19. Maintain and enhance the quality of the green belt and open space areas.	~	~	~
20. Conserve and, where appropriate, enhance the historic environment	~	~	~
21. Maintain and enhance the vitality and viability of the Borough's town centres	~	~	~
22. Improve the local economy by attracting inward investment	+	~	+
23. Maintain stable levels of employment in the Borough	+	~	-

Summary

(1) would create an intensification and diversification of uses on the site. As a high profile site close to the neighbourhood centre, it provides a good location for a mixed use development that would contribute to meeting local housing need. The ground floor commercial units are an advantage in that they would provide an active frontage to the street which would help improve the attractiveness and vitality of the area which should have knock-on benefits in terms of attracting businesses to invest in this part of Blackhorse Lane. This option would result in the loss of some existing jobs but would offer new employment opportunities.

Maintaining the status quo (2) would not provide an efficient use of the site as a number of the existing units suffer from low levels of occupancy. This option would also not help to address local housing need.

(3) would provide new homes on a key site therefore contributing to housing need in a location that benefits from good accessibility to public transport. A key disadvantage of this option is that it would not create a mix of uses and it would result in a loss of on-site employment.