

URS



Blackhorse Lane Area Action Plan **Preferred Options Sustainability Appraisal**

Interim SA Report
August 2011

Prepared for: London Borough of Waltham Forest





Revision Schedule

Blackhorse Lane Area Action Plan Preferred Options Sustainability Appraisal August 2011

Rev	Date	Details	Prepared by	Reviewed by	Approved by
01	August 2011	Interim SA Report	Mark Fessey Consultant	Vanessa Barri Senior Consultant	Steve Smith Associate

URS Scott Wilson
6 - 8 Greencoat Place
London
SW1 1PL
Tel: 020 7798 5000
Fax: 020 7798 5001

www.urs-scottwilson.com

Limitations

URS Scott Wilson Ltd (“URS Scott Wilson”) has prepared this Report for the sole use of the London Borough of Waltham Forest (“the Client”) in accordance with the Agreement under which our services were performed. No other warranty, expressed or implied, is made as to the professional advice included in this Report or any other services provided by URS Scott Wilson. This Report is confidential and may not be disclosed by the Client nor relied upon by any other party without the prior and express written agreement of URS Scott Wilson.

The conclusions and recommendations contained in this Report are based upon information provided by others and upon the assumption that all relevant information has been provided by those parties from whom it has been requested and that such information is accurate. Information obtained by URS Scott Wilson has not been independently verified by URS Scott Wilson, unless otherwise stated in the Report.

The methodology adopted and the sources of information used by URS Scott Wilson in providing its services are outlined in this Report. The work described in this Report was undertaken between July and August 2011 and is based on the conditions encountered and the information available during the said period of time. The scope of this Report and the services are accordingly factually limited by these circumstances.

URS Scott Wilson disclaim any undertaking or obligation to advise any person of any change in any matter affecting the Report, which may come or be brought to URS Scott Wilson’s attention after the date of the Report.

Certain statements made in the Report that are not historical facts may constitute estimates, projections or other forward-looking statements and even though they are based on reasonable assumptions as of the date of the Report, such forward-looking statements by their nature involve risks and uncertainties that could cause actual results to differ materially from the results predicted. URS Scott Wilson specifically does not guarantee or warrant any estimate or projections contained in this Report.

Copyright

© This Report is the copyright of URS Scott Wilson Ltd. Any unauthorised reproduction or usage by any person other than the addressee is strictly prohibited.

Table of Contents

1	Introduction	1
2	Methodology	3
3	Human Health	9
4	Economy	11
5	Employment and Skills	13
6	Transport	14
7	Crime and Safety	16
8	Housing.....	17
9	Air	18
10	Water	19
11	Biodiversity.....	20
12	Landscape and townscapes.....	21
13	Waste	22
	Annex I – Appraisal of Policy Options and Preferred Options	23
	Annex II - Compatibility of the AAP Objectives	73

1 Introduction

1.1 Background

1.1.1 London Borough of Waltham Forest (LBWF) is in the process of preparing a Local Development Framework (LDF) to guide development in the borough. The LDF will be composed of a number of Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs).

1.1.2 The Core Strategy is the central, overarching DPD which sets the vision for the area, objectives and core policies for the management of development over the plan period (up to 2026). On 31 May 2011 the Council submitted the LDF Core Strategy DPD to the Secretary of State for Communities and Local Government for independent examination.

1.1.3 An Area Action Plan (AAP) is a lower level document that should be used when there is a need to provide the planning framework for areas where significant change or conservation is needed. It is aimed at establishing a set of proposals and policies for the development of a specific area (such as a town centre or an area of new development) of a district authority and should identify the distribution of uses and their inter-relationships¹.

1.2 The Core Strategy identifies Blackhorse Lane as one of the key areas of growth in the borough, and as such an AAP is needed. The AAP will set out where new housing and new businesses should go, and what improvements to infrastructure such as pedestrian/ cycle routes, open spaces, and community facilities, are needed to support this growth.

1.3 Sustainability Appraisal (SA)

1.3.1 SA is a process by which the environmental, social and economic effects of a strategic action (a plan or a programme) are considered prior to its implementation. The purpose of undertaking this exercise is to identify the likely effects of the plan or programme in advance so that adverse effects can be minimised and beneficial effects can be enhanced. Chapter 2 of this Report provides further details on why SA is required and how it is undertaken.

1.4 The Blackhorse Lane Area

1.4.1 The Blackhorse Lane area is located in the western boundary of Waltham Forest, adjacent to the Lee Valley Regional Park and on the borders with the London Borough of Haringey. 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.

1.4.2 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.

¹ Planning Policy Statement 12: Local Spatial Planning (2008)

- 1.4.3 Some of the more deprived communities in London live in the 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 area around the station provides a key 'gateway' into Waltham Forest and has the potential to be better connected to the Lee Valley Regional Park.
 - The community can also benefit from major regeneration projects nearby in Tottenham Hale, Walthamstow Town Centre, and Stratford.

1.5 Objectives of the Area Action Plan

- 1.5.1 The following objectives have been developed as a basis for the detailed approach set out within the AAP:

(1) **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.

(2) **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.

(3) **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.

(4) **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.

(5) **A Place to do Business and for Creative Industries** - To ensure Blackhorse Lane continues to provide a range of jobs for our residents, and support the retention and growth of creative industries in the area.

(6) **A Sustainable Place** - To ensure new developments incorporate the highest levels of sustainable design and their impact on climate change is minimised.

(7) **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.

(8) **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'.

2 Methodology

2.1 Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA)

2.1.1 Under the Planning and Compulsory Purchase Act (PCPA) (2004), all Development Plan Documents (DPDs) produced by local authorities, as part of their LDF, must undergo a process of Sustainability Appraisal (SA). The Blackhorse Lane AAP is a DPD and so is subject to SA.

2.1.2 The SA process incorporates the requirements of a European law requiring certain plans and programmes to undergo a formal Strategic Environmental Assessment (SEA). SEA involves the systematic identification and evaluation of the environmental impacts of a strategic action (e.g. a plan or programme). In 2001, the EU legislated for SEA with the adoption of Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the 'SEA Directive'). The Directive entered into force in the UK on 21st July 2004 and applies to a range of English plans and programmes including DPDs.

2.1.3 SA and SEA are therefore both statutory requirements. The Government's approach to this dual requirement is to incorporate the requirements of the SEA Directive into the SA process. The SA, which considers all three pillars of sustainability, therefore incorporates the requirements of the SEA Directive. The Government published guidance on undertaking SA of spatial plans ('the Guidance') in November 2005². This Guidance has now been replaced by the Plan Making Manual (PMM) published by the Planning Advisory Service (PAS) in 2009. The combined SA/SEA process is referred to in the Guidance and in this document as 'Sustainability Appraisal (SA)'.

2.1.4 A key requirement of the SEA Directive is that:

"Where an assessment is required by this Directive, an environmental report should be prepared... identifying, describing and evaluating the likely significant environmental effects of implementing the plan or programme, and reasonable alternatives"

2.1.5 **Table 1** sets out the required content of the 'environmental report' as defined in the SEA Directive. It is important to note that this 'Interim' SA Report does not seek to provide all required content. However, all required content will be provided within the Final SA Report, which will be published for consultation alongside the Proposed Submission AAP document (expected Spring 2012).

² Office of the Deputy Prime Minister (2005) Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents <http://www.communities.gov.uk/documents/planningandbuilding/pdf/142520.pdf> [accessed 06.11.09]

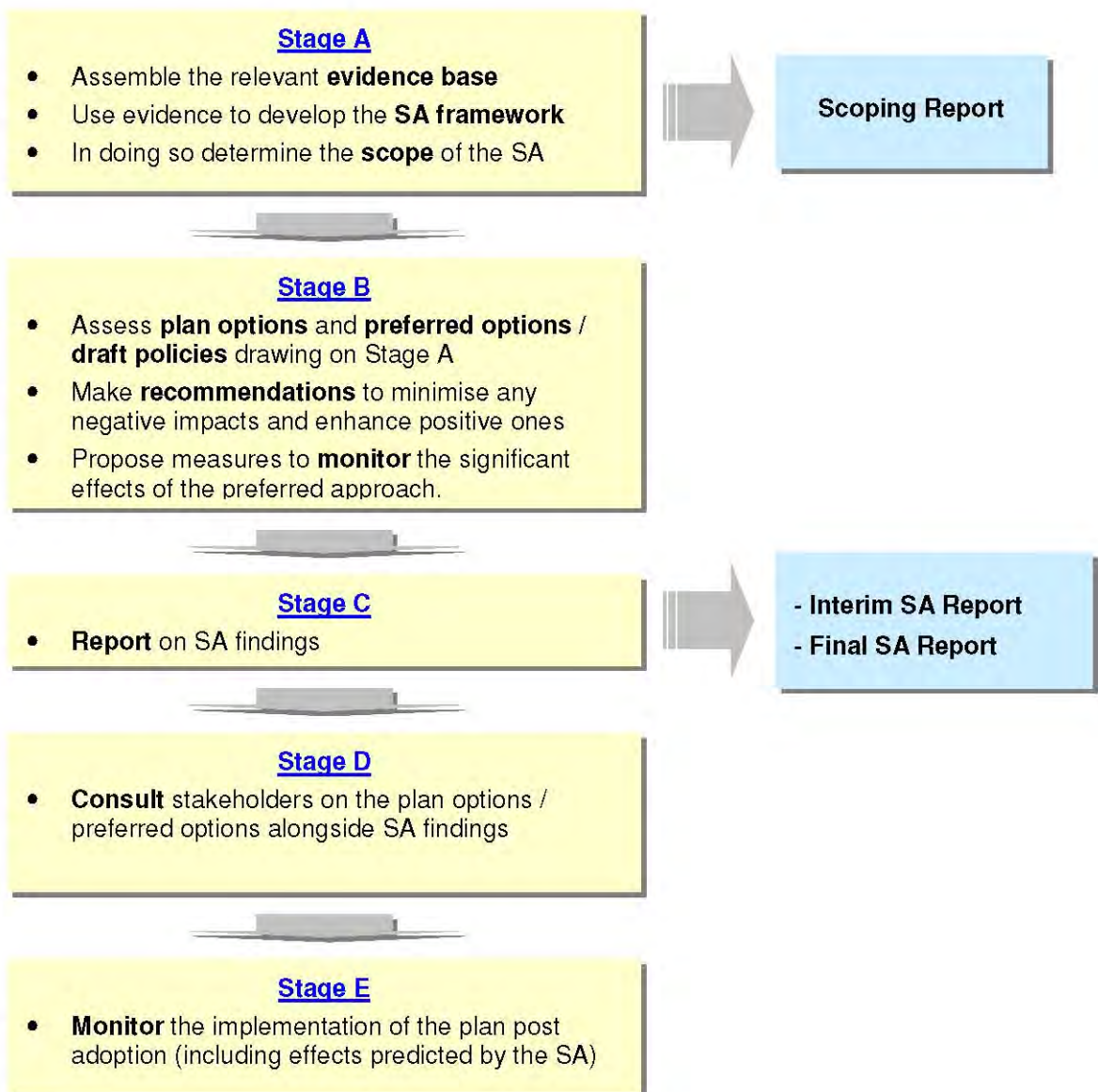
Table 1: Compliance with the SEA Directive

Information to be provided within the 'environmental report'	Where covered
An outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes	This will be summarised in the Final SA Report published alongside the Pre-Submission AAP document.
The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme	This will be summarised in the Final SA Report published alongside the Pre-Submission AAP document.
The environmental characteristics of areas likely to be significantly affected	This will be summarised in the Final SA Report published alongside the Pre-Submission AAP document.
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	Summarised in Chapters 3 to 13 of this Interim SA Report. This information will also be summarised in the Final SA Report published alongside the Pre-Submission AAP document.
The environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation	This will be summarised in the Final SA Report published alongside the Pre-Submission AAP document.
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	Appraisal findings, as they relate to options and preferred options, are presented in Chapters 3 - 13 and within Appendix 1 of this Interim SA Report. Appraisal findings will also be set out within the Final SA Report published alongside the Pre-Submission AAP document.
The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme	Recommendations are presented in Chapters 3 - 13 and within Appendix 1. Recommendations will also be set out within the Final SA Report published alongside the Pre-Submission AAP document.
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	An outline of the reasons for selecting the alternatives dealt with will be presented within the Final SA Report published alongside the Pre-Submission AAP document.
A description of the measures envisaged concerning monitoring in accordance with Article 10	Monitoring recommendations will be presented within the Final SA Report published alongside the Pre-Submission AAP document.
A non-technical summary of the information provided under the above headings	A non-technical summary will be presented within Final SA Report published alongside the Pre-Submission AAP document.

2.2 The SA process

2.2.1 Government Guidance advocates a five-stage approach to undertaking SA (see **Figure 1**).

Figure 1: The five stage approach to SA



Stage A

- 2.2.2 The purpose of Stage A is to define the scope and level of detail of the assessment. The output of Stage A is the production of a Scoping Report, which is subject to public consultation. Stage A was undertaken in 2008, with a Scoping Report published for consultation and subsequently finalised.
- 2.2.3 The Scoping Report essentially establishes a methodological 'framework' for the appraisal. Central to the framework is a set of **SA Objectives**, which are presented below:

SOCIAL

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

ENVIRONMENTAL

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

ECONOMIC

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

Stages B and C

- 2.2.4 **This Interim SA Report focuses on Stages B and C of the SA process.** Options and preferred options / draft policies have been appraised against the SA Objectives. Plan objectives have also been appraised against the SA Objectives.
- 2.2.5 For preferred options / draft policies, recommendations have been made to enhance beneficial effects and minimise adverse ones. SA findings and recommendations are published for consultation alongside the Preferred Options AAP document, and will be available to the Council as they prepare the Proposed Submission Version of the document following consultation. The Proposed Submission version of the AAP will also be subject to appraisal, with appraisal findings and recommendations presented within a Final SA Report document.

Stage D

- This Interim SA Report is now published for consultation alongside the Preferred Options AAP document; and
- The Final SA Report will be published for consultation alongside the Proposed Submission Version of the AAP.

Stage E

- 2.2.6 Stage E of the process involves monitoring the adopted plan including its sustainability impacts, as predicted through SA; this is done through the LDF Annual Monitoring Report (AMR). Monitoring suggestions will be presented within the Final SA Report.

2.3 Stage B Methodology

Appraisal of options and preferred options / draft policies

- 2.3.1 The general method adopted when undertaking the appraisal was to compare the likely situation assuming implementation of each option and preferred option / draft policy with the current situation in Waltham Forest (as identified through scoping analysis) for each SA Objective.
- 2.3.2 Where the implementation of the policy would result in little or no change to the existing situation this was recorded in the appraisal as having no effect on the Objective. Where the implementation of the policy would likely result in a change to the existing situation the effects were assessed taking into account:
- The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);
 - The probability, duration, frequency and reversibility of the effects;
 - The cumulative nature of the effects; and
 - The potential for effects to valued or vulnerable areas.
- 2.3.3 Taking into account these criteria, scoring symbols are used to give an indication of effect significance. More importantly, the significance of effects is discussed within narrative summaries.

2.3.4 The scoring symbols used in the assessment are as follows:

++	+	-	--	?	~
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

2.3.5 Significant effects associated with the draft policies presented within the AAP are summarised in Chapters 3 - 13 under the following headings:

- Human Health
- Economy
- Employment and Skills
- Transport
- Crime and Safety
- Housing
- Air
- Water
- Biodiversity
- Landscape and townscapes
- Waste

2.3.6 The appraisal of options and preferred options / draft policies is presented in greater detail within **Annex I**.

Appraisal of the AAP Objectives

2.3.7 **Annex II** presents a high level appraisal of the AAP objectives against the SA Objectives.

Difficulties encountered

2.3.8 The key difficulty is that associated with establishing a causal link between a policy approach and effects to the sustainability baseline. Often, there is considerable uncertainty, given that the precise way in which the policy approach will be implemented 'on the ground' is unknown. In other instances, where the effect of the policy can be predicted with some accuracy, it is impossible to evaluate the significance of the effect on the baseline with any accuracy because data availability limits understanding of the baseline (e.g. understanding of current sensitivity/problems and likely future trends without the plan). For example, data to understand the baseline situation for water quality may not be available at the required scale / for the required area, because the ability to monitor water quality and establish a baseline understanding of how quality varies spatially is limited by available resources. Furthermore, the accuracy of baseline data can be questionable, leading to uncertainty when it comes to the evaluation of effects. A great deal of data is collected by external agencies and therefore reliance is placed upon these agencies for such data. Where uncertainty exists, it is helpful to discuss effects in more general terms - i.e. in terms of particular sustainability issues or broad sustainability themes / the sustainability context.

3 Human Health

3.1.1 This Chapter begins by summarising the relevant sustainability issues and SA Objectives that were identified through scoping. Subsequently, appraisal findings and recommendations are presented.

3.2 Environmental and Sustainability Issues

3.2.1 The following environmental and sustainability problems have been identified:

- 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

3.3 Relevant SA Objectives

3.3.1 The following SA objectives are relevant to this sustainability topic:

- 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

3.4 Appraisal Findings

- The effect of the housing policies will be to ensure that there is a focus on mixed use development, with higher density development around the new neighbourhood centre. This should encourage residents to meet day to day needs by walking and cycling, rather than private car.
- Walking, cycling and use of public transport will also be supported by specific measures set out within Policy BHL12: Sustainable Transport. These measures are well targeted, in that they seek to capitalise on the locational opportunities that exist (for example, access to walking and cycling opportunities within the Lee Valley Regional Park).
- A benefit of focusing high 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 BHL8: Open space and nature conservation and BHL9: Walthamstow wetlands.
- It is also noted that Policy BHL7: Design and Local Character places an emphasis on significant change to the built environment and the public realm, with existing features maintained as the exception rather than the rule. This should have benefits in terms of health and well-being, as it should allow for a net increase in locally accessible green space (as well as opportunities to better link to Walthamstow Marshes).
- Improvements to open space and the public realm, as well as the development of a vibrant neighbourhood centre, will be supportive of efforts to increase social cohesion and reduce exclusion.

- The effect of policy BHL5: Employment will be to provide new B1 units for small/ medium businesses and creative industries as part of new development at the Key Sites, 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.
- Taking a carefully controlled approach to the neighbourhood centre (as opposed to allowing uses to be determined by the market) is expected to help maintain a clear hierarchy of centres, and so encourage the accessing of shops and community infrastructure by walking, cycling and public transport.
- The appraisal has noted that energy generation within the AAP area would necessitate careful consideration of implications for local environmental quality and health. However, Policy BHL10: Decentralised Energy does not directly promote local energy generation, and it is more likely that a source of heat for the district heating network will come from a source of energy generation outside of the AAP area.
- Finally, it is important to note that the AAP will not seek to focus on increasing local provision of all social infrastructure. Rather, there will be a focus on increased local provision of health and education facilities. This is thought to be an appropriate approach, with no obvious sustainability draw-backs.
- The approach proposed for the following sites is expected to further support the achievement of health related objectives:
 - Site BHL1: Station Hub and Waterfront
 - Site BHL2 North: Car Wash Site
 - Site BHL6: Webb's Industrial Estate

4 Economy

4.1.1 This Chapter begins by summarising the relevant sustainability issues and SA Objectives that were identified through scoping. Subsequently, appraisal findings and recommendations are presented.

4.2 Environmental and Sustainability Issues

4.2.1 The following environmental and sustainability problems have been identified:

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

4.3 Relevant SA Objectives

4.3.1 The following SA Objectives are relevant to this sustainability topic:

- 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

4.4 Appraisal Findings

- The housing policies should ensure that young professionals are attracted to the area. In particular, younger professionals should be attracted to the redeveloped station hub area, where high 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.
- Policy BHL5: 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.
- Policy BHL6: Neighbourhood Centre 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.
- Policy BHL7: Design and Local Character, Policy BHL8: Open space and Nature Conservation AND Policy BHL9: Walthamstow Wetlands 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.
- Setting requirements to incorporate decentralised energy infrastructure as part of development (Policy BHL10) 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.
- 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).

- 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.
- The approach to social infrastructure (Policy BHL13) set out clear priorities that should help to provide financial certainty for those looking to invest in the area.
- The approach proposed for the following sites is expected to further support the achievement of economy related objectives:
 - Site BHL1: Station Hub and Waterfront
 - Site BHL2 North: Car Wash Site
 - Site BHL2 South: Blackhorse Rd / Hawarden Road
 - Site BHL3: Willowfield School, Tavistock Avenue
 - Site BHL4: Sutherland Road
 - Site BHL5: Papermill Place
 - Site BHL6: Webb's Industrial Estate
 - Site BHL7: Billet Works
 - Site BHL8: 152/154 Blackhorse Road

4.4.1 It is noted that Site BHL2 South: Blackhorse Rd / Hawarden Road might be considered to have some short to medium term negative effects, given that the site might be put to better economic use. Having said this, long-term security in terms of local school places is an important part of the local strategy for regeneration.

- **Recommendation** - Provide further detail on temporary uses that might be appropriate for the Blackhorse Rd / Hawarden Road site.

5 Employment and Skills

5.1.1 This Chapter begins by summarising the relevant sustainability issues and SA Objectives that were identified through scoping. Subsequently, appraisal findings and recommendations are presented.

5.2 Environmental and Sustainability Issues

5.2.1 The following environmental and sustainability problems have been identified:

- 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.

5.3 Relevant SA Objectives

5.3.1 The following SA objectives are relevant to this sustainability topic:

- 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

5.4 Appraisal Findings

- Policy BHL5: Employment will result in the provision of new B1 units for small/ medium businesses as part of new development at the Key Sites, displacing existing employment uses and ensuring that these uses are, in the future, focused more within land designated as SIL. A focus on mixed-use developments with B1 uses 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. Site BHL4: Sutherland Road is a key site, where the policy approach is for there to be a considerable shift away from existing industrial employment uses.
- **Recommendation** - Make 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.
- **Recommendation** - 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'

6 Transport

6.1.1 This Chapter begins by summarising the relevant sustainability issues and SA Objectives that were identified through scoping. Subsequently, appraisal findings and recommendations are presented.

6.2 Environmental and Sustainability Issues

6.2.1 The following environmental and sustainability problems have been identified:

- 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

6.3 Relevant SA Objectives

6.3.1 The following SA objectives are relevant to this sustainability topic

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

6.4 Appraisal Findings

- The effect of the housing policies will be to ensure that there is a focus on mixed use development, with higher density development around the new neighbourhood centre. This should encourage residents to meet day to day needs by walking and cycling, rather than private car. It should also encourage residents to access employment by public transport.
- Walking, cycling and use of public transport will also be supported by specific measures set out within Policy BHL12: Sustainable Transport. These measures are well targeted, in that they seek to capitalise on the locational opportunities that exist (for example, the extension of the Lee Valley towpath to the Olympic Park) and address existing problems (such as the fact that industrial areas currently present a barrier to accessing the Walthamstow Wetlands). The policy should also lead to a considerable decrease in the ability to park cars within the area, and car free developments will be encouraged.
- **Recommendation** - provide further details on the approach to car free development.
- Policy BHL7: Design and Local Character is also supportive of efforts to increase walking, cycling and use of public transport as it should facilitate the delivery of new access routes and green infrastructure. It is 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.
- Policy BHL6: 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.

- The appraisal has not found any of the policy approaches or proposed approaches for key sites to perform poorly, or even questionably, in terms of transport related objectives. It is noted that proposals for the following key sites are particularly supportive of transport related sustainability objectives:
 - Site BHL1: Station Hub and Waterfront
 - Site BHL2 North: Car Wash Site
 - Site BHL6: Webb's Industrial Estate
 - Site BHL7: Billet Works
 - Site BHL8: 152/154 Blackhorse Road
- 6.4.1 It is also noted that land is safeguarded at Blackhorse Road / Hawarden Road for a school to come forward at some point in the future. The AAP recognises the importance of putting in place the walking and cycling links that will be required by school pupils in the future.

7 Crime and Safety

7.1.1 This Chapter begins by summarising the relevant sustainability issues and SA Objectives that were identified through scoping. Subsequently, appraisal findings and recommendations are presented.

7.2 Environmental and Sustainability Issues

7.2.1 The following environmental and sustainability problems have been identified:

- Crime levels are generally higher in Waltham Forest than nationally

7.3 Relevant SA Objectives

7.3.1 The following SA objective is relevant to this sustainability topic

- Objective 2 - Reduce crime and the fear of crime

7.4 Appraisal Findings

- It is expected that the overall effect of the AAP policies and proposals for key sites 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.
- It is also 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.
- **Recommendation** - Clarify how this proposed approach to Higham Hill Local Retail Parade may be in-line with the earmarked 'corridor scheme' along Higham Hill Road.

8 Housing

8.1.1 This Chapter begins by summarising the relevant sustainability issues and SA Objectives that were identified through scoping. Subsequently, appraisal findings and recommendations are presented.

8.2 Environmental and Sustainability Issues

8.2.1 The following environmental and sustainability problems have been identified:

- 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

8.3 Relevant SA Objectives

8.3.1 The following SA Objectives are relevant to this sustainability topic:

- 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

8.4 Appraisal Findings

- The housing policies 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.
- The sustainability implications of Policy BHL4: Affordable Housing essentially relate to the decision not to seek 50% affordable housing for new developments in the Sutherland Road area. The benefit of this approach is that it will ensure that the Papermill Place and Unity Works developments are not unbalanced, with significantly more than 50% affordable housing.
- The preferred approach to several of the following key sites involves a targeted approach to housing delivery that should contribute to the wider aim of meeting housing needs locally:
 - Site BHL1: Station Hub and Waterfront
 - Site BHL2 North: Car Wash Site
 - • Site BHL6: Webb's Industrial Estate
 - • Site BHL7: Billet Works
 - • Site BHL8: 152/154 Blackhorse Road

9 Air

9.1.1 This Chapter begins by summarising the relevant sustainability issues and SA Objectives that were identified through scoping. Subsequently, appraisal findings and recommendations are presented.

9.2 Environmental and Sustainability Issues

9.2.1 The following environmental and sustainability problems have been identified:

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

9.3 Relevant SA Objectives

9.3.1 The following SA objective is relevant to this sustainability topic:

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

9.4 Appraisal Findings

- As discussed under the 'Transport' heading, the overall effect of the AAP policies and the proposed approach to key sites will be to support walking, cycling and public transport. In turn, this will support reduced traffic congestion and hence lead to increased air quality locally.
- It is noted that the supporting text to Policy BHL12: Sustainable Transport recognises that the Standard Junction is already congested, and that any proposals that cause significant further traffic and delays could undermine improvements to the quality of the local environment.
- 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 pollution (e.g. roads and industry) and sensitive receptors (e.g. housing and schools).
- In terms of greenhouse gas emissions, it is noted that policies are put in place to ensure that opportunities are realised to incorporate a district heating network linked to decentralised energy sources. However, it is noted that the AAP does not seek to ensure standards of energy efficiency in the built environment that go beyond what is required by building regulations.

10 Water

10.1.1 This Chapter begins by summarising the relevant sustainability issues and SA Objectives that were identified through scoping. Subsequently, appraisal findings and recommendations are presented.

10.2 Environmental and Sustainability Issues

10.2.1 The following environmental and sustainability problems have been identified:

- Flood risk is likely to become an increasing issue
- Relatively high daily domestic water consumption will have implications for water supplies in the future
- Local rivers are subject to high levels of phosphates and nitrates which will have an affect on the ecology of the rivers and could alter the integrity of the existing ecological systems

10.3 Relevant SA Objectives

10.3.1 The following SA/SEA Objectives are relevant to this sustainability topic:

- Objective 13 - Improve water quality and ensure the efficient use of water resources
- Objective 14 - Reduce the risk of flooding

10.4 Appraisal Findings

- Appraisal findings do not suggest that any of the measures proposed within the AAP will have any implications for water resources or water quality. In terms of water resources, it is noted that the AAP does not require new development to achieve levels of water efficiency beyond what is required by building regulations. Regarding water quality, it is noted that the reservoirs to the west of the Blackhorse Road area do represent an important 'receptor'. However, it is expected that any development will incorporate drainage measures capable of ensuring surface runoff does not reach these water bodies.
- Policy BHL11: Flood Risk seeks to ensure that existing risk of surface water flooding is mitigated by new development. The detailed requirements set out within the policy should ensure that this approach to flood risk mitigation is at least equally as effective as the alternative approach, which would involve avoiding (either some or all) development within flood risk areas.
- It is noted that a targeted approach is taken to 'naturalising' the Dagenham Brook, which should capitalise on the potential for synergies between flood risk and health / nature conservation related sustainability objectives.

11 Biodiversity

11.1.1 This Chapter begins by summarising the relevant sustainability issues and SA Objectives that were identified through scoping. Subsequently, appraisal findings and recommendations are presented.

11.2 Environmental and Sustainability Issues

11.2.1 The following environmental and sustainability problems have been identified:

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

11.3 Relevant SA Objectives

11.3.1 The following SA Objectives are relevant to this sustainability topic:

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

11.4 Appraisal Findings

- Policies BHL8: Open Space and Nature Conservation and BHL9: Walthamstow Wetlands seek to capitalise on the Walthamstow Wetlands, which are an exceptional local asset. The local population will benefit greatly from increased access to and appreciation of nature / natural heritage.
- 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 high 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

12 Landscape and townscapes

12.1.1 This Chapter begins by summarising the relevant sustainability issues and SA Objectives that were identified through scoping. Subsequently, appraisal findings and recommendations are presented.

12.2 Environmental and Sustainability Issues

12.2.1 The following environmental and sustainability problems have been identified:

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

12.3 Relevant SA Objectives

12.3.1 The following SA objectives are relevant to this sustainability topic:

- 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

12.4 Appraisal Findings

- Although 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. It is noted that the general approach to employment is to change the use of land currently used for traditional industrial purposes. In many instances, this will mean that buildings are demolished. However, the policy does specify that existing industrial buildings of architectural merit will be refurbished where viable. Importantly, Policy BHL7: Design and Local Character 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. However, the emphasis on creating a new character for the area will mean that many buildings will not be retained.
- It is particularly notable that the proposed approach for Site BHL1: Station Hub and Waterfront highlights the Royal Standard pub as a 'useful landmark and a link to the past' (**Recommendation** - A firmer commitment could be made regarding the future of the Royal Standard Pub)
- **Recommendation** - Specify the degree to which it will be possible to make use of existing buildings in the Sutherland Road area.
- **Recommendation** - It is noted that supporting text makes reference to a 'heritage-led regeneration strategy'. It is recommended that further details are provided regarding the nature of this strategy.
- 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. 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.

13 Waste

13.1.1 This Chapter begins by summarising the relevant sustainability issues and SA Objectives that were identified through scoping. Subsequently, appraisal findings and recommendations are presented.

13.2 Environmental and Sustainability Issues

13.2.1 The following environmental and sustainability problems have been identified:

- 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.

13.3 Relevant SA Objectives

13.3.1 The following SA objective is relevant to this sustainability topic:

- Objective 9 - Reduce production of waste and increase recycling

13.4 Appraisal Findings

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

Annex I – Appraisal of Policy Options and Preferred Options

Housing density options		
SA Objective	Option A High density, with a broad mix of unit sizes	Option B: 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	-	+
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	~	~

Housing density options		
22. Improve the local economy by attracting inward investment	?	+
23. Maintain stable levels of employment in the Borough	~	~
Summary Option B performs significantly better in terms of sustainability objectives, particularly because targeting high density housing to areas of high public transport accessibility will help to 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.		

Affordable housing options:		
SA Objective	Option A Maximise on site affordable housing	Option B: 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	~	~

Affordable housing options:		
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>Option B performs well from a sustainability perspective as it will 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 would lead to a dominance of affordable housing in these areas, which could lead to unbalanced communities over time.</p>		

Policy BHL1: Housing growth			
N.B. This is not an assessment of <u>locations</u> for housing growth (i.e. the 'key sites').			
SA Objective	Short term	Medium term	Long term
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	~	~	~

Policy BHL1: Housing growth			
N.B. This is not an assessment of <u>locations</u> for housing growth (i.e. the 'key sites').			
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>An approach focused on mixed use development performs well in terms of a range of sustainability objectives, and will not lead to any sustainability conflicts. In particular, mixed use developments should:</p> <ul style="list-style-type: none"> • support a dynamic public realm, which in turn should help to strengthen community bonds and avoid social exclusion; • enable some existing buildings (i.e. those of some historical or architectural merit) to be retained for new employment and commercial uses; and • help to ensure day to day retail needs and basic community infrastructure can be met within walking distance. 			

Policy BHL2: Housing densities			
SA Objective	Short term	Medium term	Long term
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	~	+	+

Policy BHL2: Housing densities			
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

The key choice made through this policy is to focus high density development on sites surrounding Blackhorse Road Station, with development elsewhere in the AAP area coming forward at a lower density.

This spatially targeted approach performs well in terms of a number of sustainability objectives. In particular, because the Blackhorse Road Station area is an area of high public transport accessibility, high density development here should support a shift to more sustainable patterns of travel.

High density development in this area should also be supportive of efforts to attract inward investment to the area, given that young professionals will wish to live in an area of high public transport accessibility and will be happy to live in higher density development.

This policy recognises that high density housing can have draw-backs, and seeks to mitigate this by: A) identifying that there will also be a need for areas of lower density development; and B) promoting high density development that also includes ‘generous room sizes where appropriate’ and is able to meet Building for Life Standards.

Although there are clear benefits to promoting high 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 high 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 high 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.

Policy BHL3: Household sizes			
SA Objective	Short term	Medium term	Long term
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	~	~	~

Policy BHL3: Household sizes			
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>The implications of this policy are broadly equivalent to those of the previous policy. Supporting some lower density development is important from a perspective of well-being and residential amenity for families. Ensuring that lower density development is focused where there is lower public transport accessibility is appropriate from a perspective of supporting sustainable patterns of travel.</p>			

Policy BHL4: Affordable Housing			
SA Objective	Short term	Medium term	Long term
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	~	+	+

Policy BHL4: Affordable Housing			
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	~	~	~

Policy BHL4: Affordable Housing

Summary

The sustainability implications of this policy essentially relate to the decision not to seek 50% affordable housing for new developments in the Sutherland Road area. The benefit of this approach is that it will ensure that the Paper Mill Place and Unity Works developments are not unbalanced, with significantly more than 50% affordable housing.

Employment options

SA Objective	Option A Protect existing businesses	Option B Incorporate new employment as part of mixed use developments	Option C 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	~	~	~

Employment options			
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>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.</p> <p>However, refocusing on mixed-use developments with B1 uses 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 manufacturing is more likely to decline).</p> <p>An approach focused on protecting existing businesses (Option A) would also 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.</p> <p>Another important consideration is that mixed use development will be supportive of efforts to incorporate district heating.</p>			

Policy BHL5: Employment			
SA Objective	Short term	Medium term	Long term
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	~	+	+

Policy BHL5: Employment			
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	?	+	+

Policy BHL5: Employment

Summary

The key sustainability implications of this policy relate to the decision to provide new B1 units for small/medium businesses and creative industries as part of new development at the Key Sites, displacing some existing 'traditional' employment uses and ensuring that these uses are, in the future, focused more within land designated as SIL.

This approach performs well from a sustainability perspective, given that:

- existing employment uses are in many instances somewhat incompatible with nearby residential development; and
- restricting development to areas where no existing businesses are present, would hinder potential regeneration in the area.

A focus on mixed-use developments with B1 uses 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 manufacturing is more likely to decline).

However, 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.

Another benefit of mixed use development is that this approach will be supportive of efforts to incorporate district heating.

A focus on new land uses will mean that some buildings become redundant and are replaced. However, the policy does specify that existing industrial buildings of architectural merit will be refurbished where viable.

Recommendation

Make 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.

Neighbourhood centre options

SA Objective	Option A	Option B:
	Offer guidance on appropriate uses and sizes	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	~	~

Neighbourhood centre options		
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	~	~

Neighbourhood centre options

Summary

Option A will help to ensure that the Neighbourhood Centre does not have any unforeseen negative sustainability effects. In particular, it will be possible to ensure that the retail and leisure offer does not conflict with that of Waltham 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.

Option A will also be supportive of efforts to maximise the 'wider-benefits' of a neighbourhood centre. In particular, Option A should ensure that a mix of uses comes forward that supports the development of a 'hub of activity'.

It might be suggested that an Option A approach could constrain investment. However, it is not likely that this effect will be significant, given that a broad range of uses will be permitted.

Policy BHL6: Neighbourhood Centre

SA Objective	Short term	Medium term	Long term
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	~	~	~

Policy BHL6: Neighbourhood Centre			
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>This policy should ensure that the Neighbourhood Centre does not have any unforeseen negative sustainability effects. In particular, it will be possible to ensure that the retail and leisure offer does not conflict with that of Waltham 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.</p> <p>The policy approach will also be supportive of efforts to maximise the 'wider-benefits' of a neighbourhood centre. In particular, it will 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 policy approach could constrain investment. However, it is not likely that this effect will be significant, given that a broad range of uses will be permitted. In the longer term, a balanced and vial centre will be attractive to continued investment.</p>			

Design and local character options		
SA Objective	Option A Create a new character	Option B: 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	+	~

Design and local character options		
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	~	~

Design and local character options

Summary

Creating a new character for the Blackhorse Lane area (Option A) will make it possible to better capitalise on locational opportunities that present themselves. In particular, it will be possible to better capitalise on the proximity to the Lee Valley Regional Park and Walthamstow Marshes. The AAP describes how, through development, it will be possible to further develop the 'natural signature' of the area. It will also be possible to capitalise on opportunities for supporting greater walking, cycling and use of public transport.

'Creating a new character' will also 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 should result in a general improvement to the image of the area.

It is not expected that Option A will necessarily have any significant negative effects in terms of SA objectives. However, Option B 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.

Policy BHL7: Design and Local Character

SA Objective	Short term	Medium term	Long term
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	~	~	~

Policy BHL7: Design and Local Character			
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 will make it possible to better capitalise on locational opportunities that present themselves. In particular, it will be possible to better capitalise on the proximity to the Lee Valley Regional Park and Walthamstow Marshes. The AAP describes how, through development, it will be possible to further develop the 'natural signature' of the area. It will also be possible to capitalise on opportunities for supporting greater walking, cycling and use of public transport.</p> <p>'Creating a new character' will also 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 should result in a general improvement to the image of the area. A secondary benefit may be to reduce fear of crime.</p> <p>'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 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.</p>			

Public open space and nature conservation options			
SA Objective	Option A Create new open spaces	Option B Improve access to existing open spaces	Option C An integrated approach
1. Meet local housing needs through the provision of a range of	-	+	~

Public open space and nature conservation options			
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	~	~	~

Public open space and nature conservation options			
town centres			
22. Improve the local economy by attracting inward investment	+	+	+
23. Maintain stable levels of employment in the Borough	~	~	~
<p>Summary</p> <p>Walthamstow Wetlands are an exceptional and extensive blue/green asset. Therefore, the local population will benefit greatly from increased access (Option A), particularly in terms of 'health and wellbeing'. It is also likely that access to these important natural assets adds to local sense of place and heritage. Capitalising on these important local assets will help to attract residents and businesses.</p> <p>The only questionable effect of increasing access to existing open spaces (Option B) relates to the potential for increased recreational disturbance to sensitive habitats and wildlife (particularly wintering waterfowl). 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). An approach that seeks to deliver both increased access and the new open space within the built-up area (Option C) would most likely avoid any risk of recreational disturbance.</p> <p>In turns of most 'health and wellbeing' benefits, an approach focused on creating new open spaces (Option B) will also have a positive effect, but benefits may not be of the same magnitude. Essentially, this is because it will not be possible to create habitat that is of the same quality as the Walthamstow Wetlands.</p> <p>A particular benefit of an approach focused on the creation of new open space is that it may help to reduce the 'urban heat island' effect. New open spaces can also provide a buffer between sources of pollution (e.g. roads and industry) and sensitive receptors (e.g. housing and schools).</p>			

Policy BHL8: Open Space and Nature Conservation <u>AND</u> Policy BHL9: Walthamstow Wetlands			
SA Objective	Short term	Medium term	Long term
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	~	+	+

Policy BHL8: Open Space and Nature Conservation <u>AND</u> Policy BHL9: Walthamstow Wetlands			
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>The proposed approach seeks to capitalise on the Walthamstow Wetlands, which are an exceptional local asset. The local population will benefit greatly from increased access and it is likely that a more general effect will be increased local sense of place and heritage. Increasing links to the Walthamstow Wetlands will also help to attract residents and businesses to the area.</p> <p>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.</p>			

Policy BHL10: Decentralised Energy			
SA Objective	Short term	Medium term	Long term
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	~	~	~

Policy BHL10: Decentralised Energy			
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>Blackhorse Lane is an area with potential for a district heating system that could minimise carbon emissions from development. This policy should ensure that individual developments take up the opportunity link to the network. It is not expected that the effect will be to discourage developers from investing in the area as there is the potential for developers to opt out of linking to the network if it can be demonstrated that doing so would be financially unviable.</p> <p>To some extent, the policy increases the chances of a small energy generation plant being developed within the Blackhorse Lane Area. If this were to materialise, then there would be a need to consider health implications (primarily relating to the delivery of fuel). However, it is more likely that heat for the district heat network will come from an energy generation source outside of the AAP area.</p>			

Flood risk options			
SA Objective	Option A Avoid new development in flood risk areas	Option B Only less vulnerable uses should be allowed in flood risk areas	Option C New developments 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	-	?	+

Flood risk options			
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 All options could effectively avoid flood risk. However, Options A and B would restrict development, and so could potentially hinder the regeneration of the Blackhorse Lane Area.</p>			

Policy BHL11: Flood Risk			
SA Objective	Short term	Medium term	Long term
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.	~	+	+

Policy BHL11: Flood Risk			
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>This policy seeks to ensure that existing risk of surface water flooding is mitigated by new development. This is an approach that can be associated with some risks. However, the detailed requirements set out within the policy seek to ensure that there is no risk.</p> <p>The policy 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).</p> <p>It is noted that a targeted approach is taken to 'naturalising' the Dagenham Brook, which should capitalise on the potential for synergies between flood risk and health / nature conservation related sustainability objectives.</p>			

Transport options		
SA Objective	Option A Predict and provide for road traffic	Option B: 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	-	+

Transport options		
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. Options B seeks to achieve this by supporting walking and cycling and priority bus routes. Reducing travel by private car has benefits in terms of Sustainability Objectives 8, 10 and 12. 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 could have negative effects on local businesses. However, in the long term the effects are likely to be beneficial given that, without measures to curb car use, traffic congestion would worsen over time.</p>		

Policy BHL12: Sustainable Transport			
SA Objective	Short term	Medium term	Long term
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.	~	~	~

Policy BHL12: Sustainable Transport			
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. This policy seeks to achieve this by supporting walking and cycling and priority bus routes.</p> <p>Reducing travel by private car has benefits in terms of Sustainability Objectives 8, 10 and 12. 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 could have negative effects on local businesses. However, in the long term the effects are likely to be beneficial given that, without measures to curb car use, traffic congestion would worsen over time.</p>			

Social Infrastructure options		
SA Objective	Option A Aim to provide all forms of social infrastructure	Option B: 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	~	~

Social Infrastructure options		
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. Option A aims to provide all forms of social infrastructure. However, there is a risk that the cost of this provision may deter new development, and hence hinder regeneration with wide ranging sustainability implications. Option B draws on evidence to identify new education and health facilities as social infrastructure priorities.</p>		

Policy BHL13: Social Infrastructure			
SA Objective	Short term	Medium term	Long term
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	~	~	~

Policy BHL13: Social Infrastructure			
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	+	+	+

Policy BHL13: Social Infrastructure			
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. The policy recognises that it is not possible to provide all forms of social infrastructure, and so prioritises the delivery of new education and health facilities. This is an evidence-based approach.</p> <p>The policy also makes the important commitments to deliver community uses and social infrastructure as part of mixed use developments. There could be the potential for some uses to conflict with residential amenity; however, this effect will be avoided by the policy proviso that there should be 'no overriding concerns in terms of neighbour amenity'.</p> <p>Another important commitment is to 'incorporate or replace The Royal Standard Public House in the redevelopment of the Station Hub area'. It is important to note that 'replacing' this pub could result in the loss of an important link to the past.</p> <p>Finally, it is noted that there is a commitment to 'resist the net loss of key social infrastructure in new developments.'</p>			

Site BHL1: Station Hub and Waterfront			
SA Objective	Short term	Medium term	Long term
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	~	+	+

Site BHL1: Station Hub and Waterfront			
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	+	+	+

Site BHL1: Station Hub and Waterfront

Summary

Proposals should ensure that opportunities associated with this key site are realised.

This is a prominent site and so its regeneration is key to regeneration of the Blackhorse Lane area as a whole, and also the wider borough. Proposals to ensure that ground floor units are used for a mix of commercial uses, including (non-retail) small businesses, will be particularly important. A focus on small retail and small business uses will also help to ensure that a local centre develops that sits within the existing 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. Importantly, the policy states that 'successful existing businesses' will be incorporated. The policy also highlights the Royal Standard pub as a 'useful landmark and a link to the past'.

Higher density mixed use development at this site will help to ensure housing needs are met in a location that will encourage walking and cycling, and that has excellent public transport links.

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.

Some question-marks remain regarding the potential for impacts to the sensitive biodiversity of the Walthamstow Wetlands. However, it is expected that effects will be avoided or sufficiently mitigated at the design and implementation phase.

Recommendation

It is 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'

Recommendation

A firmer commitment could be made regarding the future of the Royal Standard Pub

Site BHL2 North: Car Wash Site

SA Objective	Short term	Medium term	Long term
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	~	+	+

Site BHL2 North: Car Wash Site			
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	~	~	~

Site BHL2 North: Car Wash Site

Summary

Proposals should ensure that opportunities associated with this key site are realised.

This is a prominent site and so its regeneration is key to regeneration of the Blackhorse Lane area as a whole, and also the wider borough. Proposals to ensure that ground floor units are used for a mix of commercial uses will be particularly important. A focus on small retail and small business uses will 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 will help to ensure housing needs are met in a location that will encourage walking and cycling, and that has excellent public transport links. An important commitment is made to the development of 'car-free development'.

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.

Some question-marks remain regarding the potential for impacts to the sensitive biodiversity of the Walthamstow Wetlands. However, it is expected that effects will be avoided or sufficiently mitigated at the design and implementation phase.

Site BHL2 South: Blackhorse Rd / Hawarden Road

SA Objective	Short term	Medium term	Long term
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	~	~	~

Site BHL2 South: Blackhorse Rd / Hawarden Road			
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>An important choice has been made to safeguard this vacant brownfield land so that it remains available for the development of a school at some point in the future. There is clear justification for this from a perspective of ensuring local access to education, which is an important sustainability objective given existing issues of underachievement and deprivation.</p> <p>However, educational benefits will not be felt for some years (i.e. until the school is built), and so it is important to consider that benefits that might be derived from alternative uses of this site (in the shorter term) are being foregone.</p> <p>It is also important to consider that whilst this site remains vacant, it might be considered to detract from the overall image of the area. It is noted that temporary uses will be encouraged. However, no further details are given as to what such uses might be, and so there is no way</p> <p>Recommendation</p> <p>Provide further detail on temporary uses that might be appropriate for the Blackhorse Rd / Hawarden Road site.</p>			

Site BHL3: Willowfield School, Tavistock Avenue			
SA Objective	Short term	Medium term	Long term
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.	~	~	~

Site BHL3: Willowfield School, Tavistock Avenue			
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 school clearly serves an important educational function, and there is no reason to suggest that there could be greater benefits associated with an alternative use of this site.			

Site BHL4: Sutherland Road			
SA Objective	Short term	Medium term	Long term
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	~	~	~

Site BHL4: Sutherland Road			
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>As a result of proposals for this site, existing industrial uses that are less compatible with nearby residential should be lost. This may result in the loss of important local employment. It is noted that 'the primary employment function of the area' will remain, but the focus will be on creative industries. Given that existing residents that rely on current employment uses will not be expected to take up the newly available jobs, it may be that some negative impacts can be expected in terms of access to local employment opportunities. However, newly created employment opportunities will 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.</p> <p>Recommendation</p> <p>Specify the degree to which it will be possible to make use of existing buildings in the Sutherland Road area.</p>			

Site BHL5: Papermill Place			
SA Objective	Short term	Medium term	Long term
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	~	~	~

Site BHL5: Papermill Place			
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	+	+	+

Site BHL5: Papermill Place			
23. Maintain stable levels of employment in the Borough	~	~	~
<p>Summary</p> <p>This is an important, high quality residential development that plays an important role in terms of the achievement of wider regeneration objectives. There is no reason to suggest that any alternative approach should be taken to developing the site.</p>			

Site BHL6: Webb's Industrial Estate			
SA Objective	Short term	Medium term	Long term
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	~	~	~

Site BHL6: Webb's Industrial Estate			
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>The proposal is to make good use of this currently underused site through a mixed use development. This approach performs well from a sustainability perspective, and it is also noted that, as a result of development, an important opportunity will be realised to improve access to the station, a new neighbourhood centre, and the wetlands, for occupiers of recent development such as at Papermill Place. It is noted that some existing industrial uses will be lost. However, 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.</p> <p>It is noted that an alternative use for this site, that has been considered in the past, was for industrial uses. It is recognised that this use would not be fitting with the achievement of wider regeneration objectives for the area.</p>			

Site BHL7: Billet Works			
SA Objective	Short term	Medium term	Long term
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	~	~	~

Site BHL7: Billet Works			
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	?	+	+

Site BHL7: Billet Works

Summary

The proposal is to make better use of this currently underused site through the achievement of a mixed use development. As such, the approach performs well in terms of sustainability objectives.

It is noted that an alternative use of this site would be to deliver residential at a higher density. This approach would not perform as well from a sustainability perspective given that higher density development is best targeted to the Station Hub area, where there is better public transport accessibility.

It is noted that there are no plans to make use of existing buildings at this site. This would appear to be an appropriate approach, given the poor quality of existing buildings.

It is noted that some existing employment uses will be lost. However, 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.

Site BHL8: 152/154 Blackhorse Road

SA Objective	Short term	Medium term	Long term
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	~	~	~

Site BHL8: 152/154 Blackhorse Road			
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>The proposal seeks to better make use of this site, recognising that the prominent location of the site means that a high quality development can contribute to the achievement of regeneration objectives for the wider area.</p> <p>The site is an appropriate location for residential development, given good accessibility to public transport. Employment uses are restricted to commercial uses that will not generate traffic, given existing traffic congestion issues at Standard Junction.</p> <p>It is noted that there are no plans to make use of the existing building at this site. This would appear to be an appropriate approach, given that the existing building is not of high quality.</p> <p>Although there is not a commitment for a net increase in employment on-site, the regeneration of the wider area will mean that there is a net increase locally of office type employment opportunities.</p>			

Site BHL9: Former Essex Arms Public House			
SA Objective	Short term	Medium term	Long term
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	~	~	~

Site BHL9: Former Essex Arms Public House			
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	~	~	~

Site BHL9: Former Essex Arms Public House

Summary

There are no significant sustainability implications associated with the proposed approach for this site (a Tesco Express that is currently under construction). There is no evidence to suggest that any alternative use would be more appropriate.

Site BHL10: Gun Site Playing Field, Folly Lane

SA Objective	Short term	Medium term	Long term
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	~	~	~

Site BHL10: Gun Site Playing Field, Folly Lane			
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>Given that this site is not currently performing the role of 'playing fields', and will not perform this role in the future, it is appropriate that the playing field designation is removed. Ensuring that the land still performs the role of Green Belt is appropriate, in terms of contributing the image of the wider area and supporting the achievement of regeneration objectives.</p>			

Site BHL11: Higham Hill Local Retail Parade			
SA Objective	Short term	Medium term	Long term
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	~	~	~

Site BHL11: Higham Hill Local Retail Parade			
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>The proposed approach seeks to respond to evidence of existing problems. In particular, evidence is available to suggest that this local parade is performing badly, and in decline. The approach to addressing this issue involves consolidating the retail uses, and converting some other retail uses to residential. This would seem to be an appropriate approach to supporting the viability of this local centre, and so is found to perform well in terms of sustainability objectives. Importantly, the policy specifies some uses that should not be lost to residential, unless they can be re-provided within the designated parade.</p> <p>Recommendation</p> <p>Clarify how this proposed approach to Higham Hill Local Retail Parade may be in-line with the earmarked 'corridor scheme' along Higham Hill Road.</p>			

Annex II - Compatibility of the AAP Objectives

Table A presents an appraisal of the eight objectives that are presented for Blackhorse Lane within the AAP Preferred Options document. Rather than seeking to identify ‘significant effects’ this appraisal has involved a more ‘general discussion compatibility’, in recognition of the fact that the objectives are high level. Following-on from Table A:

- **Table B** considers each AAP objective in turn, summarising some of the key points raised; and
- **Table C** considers each SA objective in turn, summarising some of the key points raised.

Table A Sustainability Assessment of AAP Objectives

	✓	×	?	Questionable compatibility	~	No relationship	
✓	Generally compatible	×	Generally incompatible	?	Questionable compatibility	~	No relationship

SA Objectives	Blackhorse Lane AAP Objectives							
	1	2	3	4	5	6	7	8
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	~	~	~	~	?	~	~	~

Table B: Key points raised for each AAP objective

AAP Objective	Comments on areas of 'questionable compatibility'
(1) 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.	<ul style="list-style-type: none"> Policy is established to encourage the integration of exiting buildings of merit. However, utilisation of existing buildings will be more the exception than the rule. There may be some potential for recreational impacts to biodiversity, given proximity to the Walthamstow Wetlands. However, it is likely that effects can be avoided / mitigated.
(2) 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.	<ul style="list-style-type: none"> No instances of questionable compatibility.
(3) 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.	<ul style="list-style-type: none"> The focus on access could lead to the potential for recreational impacts to sensitive biodiversity associated with the Walthamstow Wetlands. However, it is likely that effects can be avoided / mitigated.
(4) 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.	<ul style="list-style-type: none"> No instances of questionable compatibility.
(5) A Place to do Business and for Creative Industries - To ensure Blackhorse Lane continues to provide a range of jobs for our residents, and support the retention and growth of creative industries in the area.	<ul style="list-style-type: none"> In the long term, it is expected that this planned approach to restructure local economic activity will result a more prosperous locality, with fewer problems of deprivation. However, in the short-term, there is the potential for some sectors of society (i.e. those that rely on employment in 'traditional industries') to be negatively impacted. In some instances, it will be possible to make use of buildings currently used for 'traditional industries'. However, this will not always be possible.

<p>(6) A Sustainable Place - To ensure new developments incorporate the highest levels of sustainable design and their impact on climate change is minimised.</p>	<ul style="list-style-type: none"> • Requiring development to incorporate decentralised energy may result in a financial burden, and so perhaps act to de-incentivise investment. However, policy measures are in place to avoid this situation. • There is some potential for a focus on district heating to incentivise the development of a decentralised energy source within the AAP area, which in turn would necessitate careful consideration of the potential for negative effects on local environmental quality. However, this effect is highly uncertain. • Aside from support for a district heating network, the AAP does not include policy to require or encourage development to achieve standards of energy efficiency beyond what is required by building regulations.
<p>(7) 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.</p>	<ul style="list-style-type: none"> • No instances of questionable compatibility.
<p>(8) 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'.</p>	<ul style="list-style-type: none"> • The approach proposed within the AAP involves focusing on the delivery of education and health infrastructure, rather than 'other' community infrastructure.

Table C: Key points raised for each SA objective

SA Objective	Comments
<p>1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings</p>	<ul style="list-style-type: none"> • Requiring development to incorporate decentralised energy may result in a financial burden, and so perhaps act to de-incentivise investment. However, policy measures are in place to avoid this situation
<p>2. Reduce crime and the fear of crime</p>	<ul style="list-style-type: none"> • Numerous objectives and detailed policies within the AAP will combine to ensure a better quality and more 'vital' public realm, which should help to ensure reduced fear of crime.

<p>3. Improve standard of health and wellbeing of those who live and work in the borough</p>	<ul style="list-style-type: none"> • Objectives and policies that have the effect of encouraging walking and cycling, and encouraging access to nature will result in benefits. • There is some potential for a focus on district heating to incentivise the development of a decentralised energy source within the AAP area, which in turn would necessitate careful consideration of the potential for negative effects on local environmental quality. However, this effect is highly uncertain.
<p>4. Increase the provision of and access to community facilities to meet local cultural, recreational and social needs</p>	<ul style="list-style-type: none"> • Objectives and policies that result in greater 'permeability' by walking and cycling perform well in terms of this objective. • The approach proposed within the AAP involves focusing on the delivery of education and health infrastructure, rather than 'other' community infrastructure.
<p>5. Improve educational attainment in schools</p>	<ul style="list-style-type: none"> • The AAP seeks to ensure that school pupils will benefit from improved access to nature and natural heritage.
<p>6. Improve opportunities for access to education and training for all residents</p>	<ul style="list-style-type: none"> • The AAP seeks to ensure that school pupils will benefit from improved access to nature and natural heritage.
<p>7. Reduce the overall level of deprivation</p>	<ul style="list-style-type: none"> • Numerous objectives and policies will act to bring about regeneration and hence address problems of deprivation that currently exist. • In the long term, it is expected that this planned approach to restructure local economic activity will result a more prosperous locality, with fewer problems of deprivation. However, in the short-term, there is the potential for some sectors of society (i.e. those that rely on employment in 'traditional industries') to be negatively impacted.
<p>8. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system</p>	<ul style="list-style-type: none"> • Numerous objectives and detailed policies within the AAP will combine to promote walking, cycling and use of public transport.
<p>9. Reduce production of waste and increase recycling</p>	<ul style="list-style-type: none"> • It is not expected that the AAP will have a significant effect in terms of waste management.
<p>10. Reduce greenhouse gas emissions</p>	<ul style="list-style-type: none"> • Objectives and policies that have the effect of encouraging walking and cycling, and use of public transport will result in benefits. • The AAP supports delivery of a district heating network.

11. Conserve energy	<ul style="list-style-type: none"> Aside from support for a district heating network, the AAP does not include policy to require or encourage development to achieve standards of energy efficiency beyond what is required by building regulations.
12. Improve air quality through a reduction in traffic-based emissions	<ul style="list-style-type: none"> Objectives and policies that have the effect of encouraging walking and cycling, and use of public transport will result in benefits. There is some potential for a focus on district heating to incentivise the development of a decentralised energy source within the AAP area, which in turn would necessitate careful consideration of the potential for negative effects on local environmental quality. However, this effect is highly uncertain.
13. Improve water quality and ensure the efficient use of water resources	<ul style="list-style-type: none"> Although the nearby Walthamstow Wetlands represent a 'sensitive receptor', it is not thought that development within the AAP area brings with it the risk of pollution, given that adequate drainage can be expected.
14. Reduce the risk of flooding	<ul style="list-style-type: none"> The AAP promotes an 'integrated' approach to managing flood risk, ensuring that flood risk will be addressed alongside the achievement of objectives relating to biodiversity, health and well-being.
15. Reduce contamination and safeguard soil quality and quantity	<ul style="list-style-type: none"> It is not expected that the AAP will have a significant effect in terms of soil quality and quantity.
16. Make the best use of previously developed land (PDL) and existing buildings	<ul style="list-style-type: none"> Policy is established to encourage the integration of exiting buildings of merit. However, utilisation of existing buildings will be more the exception than the rule.
17. Conserve and enhance biodiversity	<ul style="list-style-type: none"> The focus on access could lead to the potential for recreational impacts to sensitive biodiversity associated with the Walthamstow Wetlands, particularly given the proximity of the new neighbourhood centre. However, it is likely that effects can be avoided / mitigated, including through the creation of new areas of open/green space.
18. Protect the ecological integrity of Natura 2000 sites	<ul style="list-style-type: none"> The focus on access could lead to the potential for recreational impacts to sensitive biodiversity associated with the Walthamstow Wetlands, particularly given the proximity of the new neighbourhood centre. However, it is likely that effects can be avoided / mitigated, including through the creation of new areas of open/green space.

<p>19. Maintain and enhance the quality of the green belt and open space areas</p>	<ul style="list-style-type: none"> It is expected that numerous objectives and policies will help to ensure that the AAP area becomes less 'grey' and more 'green' in the future.
<p>20. Conserve and, where appropriate, enhance the historic environment</p>	<ul style="list-style-type: none"> Policy is established to encourage the integration of existing buildings of merit. However, utilisation of existing buildings will be more the exception than the rule.
<p>21. Maintain and enhance the vitality and viability of the borough's town centres</p>	<ul style="list-style-type: none"> Achievement of a successful new neighbourhood centre is a focus of numerous AAP objectives and policies.
<p>22. Improve the local economy by attracting inward investment</p>	<ul style="list-style-type: none"> Enhancing the attractiveness of the area to investors is a focus of numerous AAP objectives and policies. Requiring development to incorporate decentralised energy may result in a financial burden, and so perhaps act to de-incentivise investment. However, policy measures are in place to avoid this situation.
<p>23. Maintain stable levels of employment in the borough</p>	<ul style="list-style-type: none"> In the long term, it is expected that this planned approach to restructure local economic activity will result a more prosperous locality, with fewer problems of deprivation. However, in the short-term, there is the potential for some sectors of society (i.e. those that rely on employment in 'traditional industries') to be negatively impacted.