

Local Development Framework (LDF) Development Management Policies

Issues and Options Stage

Initial Sustainability Appraisal

March 2010

Sustainability Appraisal Report

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1. Non- Technical Summary

1.1.1 Context

1.1.2 The Government requires that all local planning authorities test their plans using sustainability appraisal to ensure that they do not conflict with the aims of sustainable development. This report provides general commentary on the likely significant impacts on the borough in terms of the contribution towards sustainability that could arise if the proposed issues and options proposed for the London Borough of Waltham Forest Development Management Policies Issues and Options are implemented.

1.1.3 Each proposed issue and option is assessed in terms of the overall balance of impacts on an agreed set of Sustainability Appraisal objectives (the 'SA Framework'). This methodology is outlined in the Sustainability Appraisal Scoping Report and has been developed through consultation with key stakeholders. This appraisal is part of a process, which seeks to achieve preferred options and ultimately policies, which are in line with the principles of sustainable development. A copy of the SA Scoping Report is available on the Council's website at www.walthamforest.gov.uk/ldf

1.1.5 The broad generality of most of the options proposed means that the appraisal only summarised the principles involved. However the results indicate that the draft policy approach suggested by the issues and options document generally advances Waltham Forest's growth in a sustainable manner.

1.1.6 While care will need to be taken to ensure that future development does not exacerbate flood risk, waste problems and energy and water consumption, this may be assessed in greater detail on a site by site basis and/or through the 'Preferred Options' stage of the Development Management Policies DPD.

1.2 Purpose of this document

- 1.2.1 This document is the Initial Sustainability Appraisal Report for the Development Management Issues and Options Report and seeks to determine the performance in sustainability terms, of the proposed issues and options but does not seek to pre-judge the approach which the Preferred Options document should adopt. Its role is to assist with the identification of the appropriate approach, in sustainability terms, to predict implications for sustainable development and put forward recommendations for improvement where necessary.
- 1.2.2 The Issues and Options Paper was appraised against the SA Framework which was determined through the LDF Sustainability Scoping Report published in October 2008. The scoping report was the first stage in incorporating SA into the LDF process. It set out the review of the baseline information that has been collected so far which gives an indication of the current state of Waltham Forest and how it may change in the future. It included a draft SA Framework outlining 23 Sustainability Objectives and proposals as to how the SA would be carried out and appraised against. Through consultation with relevant statutory consultees and a wider LDF consultee base, feedback was sought on various elements of the Scoping Report, which were amended as appropriate.
- 1.2.3 The findings of the Scoping Report consultation have assisted the Council in the development and appraisal of options for the emerging Core Strategy. The Council have used the results of the Issues and Options and feedback from consultation to define its Preferred Options for each policy approach. The Preferred Options will now be subject to further SA in this paper.

1.3 The SA Process

The process so far has included;

- Collection of baseline information on the environmental, social and economic characteristics of the borough and its context;
- Identification of sustainability issues, objectives and indicators to be used in the SA to assess the likely impacts of the policies and to enable monitoring of progress in the future
- The preparation of a Scoping Report which set out the proposed method of assessment for the SA which has

previously been consulted upon. This document is available on the Council website.

- An interim SA for the Issues and Options stage which was completed in-house by the Spatial Planning team (this document).

1.4 The SA Scoping Report

The findings of the Scoping Report consultation have assisted the Council in the development and appraisal of options for the emerging Core Strategy. The SA Scoping Report identified 23 sustainability appraisal objectives (the SA Framework) for Waltham Forest which form the SA Framework against which each policy is tested. The SA Framework is as follows:

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 enhance the historic built and natural 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

1.4.1 Each option is assessed in general terms of the overall balance of impacts against this SA Framework. This methodology is outlined in the Sustainability Appraisal Scoping Report and has been developed through consultation. This appraisal is part of a process, which seeks to achieve preferred options and ultimately policies, which are in line with the principles of sustainable development.

1.5.2 The potential impacts of the issues and options document that have been identified will inform the drafting of the Preferred Options DPD. Where negative impacts have been identified, mitigation measures have been suggested to help to overcome these. These mitigation measures will be refined with the development of the submission Development Management DPD.

1.6 The next stages

1.6.1 Sustainability appraisal is an on-going iterative process and a valuable tool for the Planning Policy team in helping to formulate robust policies for the Development Management Policies- 'Preferred Options' stage. . The submission stage will contain a single SA/SEA Report which will integrate all SA work undertaken thus far into a single document which will be submitted for approval to the Planning Inspector.

2. Introduction and Methodology

2.1 Purpose of the SA and the SA Report

2.1.1 Section 39 of the Planning and Compulsory Purchase Act 2004 requires a Sustainability Appraisal (SA) to be carried out on all Development Plan Documents and Supplementary Planning Documents which a Local Planning Authority produces. The SA process is integral to the production of DPDs and SPDs and it enables the LPA to assess the degree to which the plans and proposals contribute towards the achievement of Sustainable Development. This understanding assists in the preparation of planning policy.

2.1.2 Sustainable Development is defined as “development which meets the needs of the present without compromising the ability of future generations to meet their own needs”. The purpose of SA is to ensure that all Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs) conform to the Government’s guiding principles of Sustainable Development, which are:

- Living within Environmental Limits
- Ensuring a Strong, Healthy and Just Society
- Achieving a Sustainable Economy
- Promoting Good Governance; and
- Using Sound Science Responsibly.

2.1.3 SA identifies and reports on the likely significant effects of the plan and mitigation measures which can be taken to reduce them. These effects are identified through the use of a Sustainability Appraisal framework. The SA Report details the results of the analysis of the options considered and the sustainability reasons for choosing the Preferred Options.

2.2 Approach to the SA

2.2.1 The SA has been carried out using the methodology set out in Government Guidance, (ODPM, 2005). The table below sets out how the SA process has been incorporated within the DPD process.

Table 2.1: The Sustainability Appraisal Process

Table 4.1 The Sustainability Appraisal Process
DPD Stage 1: Pre-Production - Evidence Gathering
SA Stages and Tasks
<p>Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope.</p> <ul style="list-style-type: none"> • A1: Identifying other relevant policies, plans and programmes and sustainability objectives. • A2: Collecting baseline information. • A3: Identifying sustainability issues and problems. • A4: Developing the SA framework. • A5: Consulting on the scope of the SA.
DPD Stage 2: Production
SA Stages and Tasks
<p>Stage B: Developing and refining options and assessing effects. (This stage)</p> <ul style="list-style-type: none"> • B1: Testing the DPD objectives against the SA framework. • B2: Developing the DPD options. • B3: Predicting the effects of the DPD. • B4: Evaluating the effects of the DPD. • B5: Considering ways of mitigating adverse effects and maximising beneficial effects. • B6: Proposing measures to monitor the significant effects of implementing the DPDs.
<p>Stage C: Preparing the Sustainability Appraisal Report.</p> <ul style="list-style-type: none"> • C1: Preparing the SA Report.
<p>Stage D: Consulting on the Preferred Options of the DPD and the SA</p>

<p>Report.</p> <ul style="list-style-type: none"> • D1: Public participation on the Preferred Options of the DPD and the SA Report. • D2(i): Appraising significant changes.
DPD Stage 3: Examination
SA Stages and Tasks
<ul style="list-style-type: none"> • D2(ii): Appraising significant changes resulting from representations.
DPD Stage 4: Adoption and Monitoring
SA Stages and Tasks
<ul style="list-style-type: none"> • D3: Making decisions and providing information.
<p>Stage E: Monitoring the significant effects of implementing the DPD.</p> <ul style="list-style-type: none"> • E1: Finalising aims and methods for monitoring. • E2: Responding to adverse effects.

2.2.2 As illustrated above, this SA Report has been carried out in two main stages and as such, two reports have been produced:

- The SA Scoping Report was published for a 6 week consultation period during 25 June to the 1 September 2008. The Scoping Report covered the stage 'A' tasks as set out in the table above. An amended SA Scoping Report was published in October 2008 which incorporated the consultation responses received.
- This initial SA Report was prepared in-house and will be available as part of the Development Management Policies Issues and Options document. Both documents will be available for consultation from the **19 March to 30 April 2010.**

2.3 When the SA was Carried Out and by Whom

- 2.3.1 With the exception of the production of the SA Scoping Report, the Council has carried out the majority of the SA work for the Local Development Framework generally and the Development Management Policies DPD specifically in-house and it is considered that this has provided substantial benefits to an understanding of the key sustainability issues that face the Waltham Forest.
- 2.3.2 An SA Scoping Report was prepared during summer of 2008 and was published in October. The statutory consultation period ran from 25 June to 1 September 2008. An Initial SA Report was produced alongside the Issues and Options Paper and both documents were published for consultation in the same period while a more detailed Report was carried out in-house to better inform the decision making of the policy team.
- 2.3.3 This SA Report has been produced alongside the Development Management Policies –‘Issues and Options’ report and the documents will undergo a six week consultation from 29 March to 7 May 2010.

2.4 Who was Consulted, When and How

- 2.4.1 At the Scoping Stage, a range of social, economic and environmental interests were consulted, as well as neighbouring authorities and the Statutory Bodies (Natural England, English Heritage and the Environment Agency). The full list of consultees is set out in the SA Scoping Report. The responses have been summarised and can be downloaded from the Council’s website. The responses were used in the preparation of the amended SA Scoping Report which can also be downloaded from the website www.walthamforest.gov.uk/ldf
- 2.4.2 This initial SA Report will be made available for consultation as part of the Development Management Policies Issues and Options paper. The three Statutory Environmental Bodies will receive a hard copy of the Report, while others received a leaflet which explained the SA process and raised awareness of the Initial SA Report. Responses received have been summarised and can be downloaded from the website.

2.5 How can I comment on this report?

- 2.5.1 This SA Report is being published alongside the Council's Development Management Policies Issues and Options and is subject to a six week consultation from. Any comments on this you may have in response to the questions asked in this document must be submitted to the Council by 5pm on **30 April 2010**.
- 2.5.2 We are encouraging on line (electronic) submission of your responses. This is extremely helpful to us in managing the many representations we are likely to receive. The online submission system is also good for us all – it saves paper and postage costs and allows you to check the status of your submission at any time
- 2.5.3 However, if you cannot, or prefer not to submit on-line for any reason, we will welcome paper submissions. For all enquires relating to this document and how to submit your comments, please contact:

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2.6 The next stage

- 2.6.1 The Preferred Options stage will contain a more comprehensive SA Report which will integrate all SA work undertaken in this report plus any submissions received into a single document. At submission stage a single SA/SEA Report which will be submitted for approval to the Planning Inspector alongside the final Development Management Policies Development Plan Document.

3. Summary of Key Findings

- 3.1.1 This section presents a summary of the main impacts of the strategic objectives and draft policy approaches of the emerging Development Management Policies on the SA Framework. It also outlines how the potential negative impacts of these can be mitigated against. A more detailed analysis of the objectives and policy options can be found in the appendices at the end of the Report.
- 3.1.2 Given the broad generalities of most of those options the appraisal only summarised the principles involved. It should be noted that uncertainties underlie many of the alternative options presented, and whilst issues such as housing growth, waste generation, mineral and energy consumption and transport infrastructure can be identified at a local authority level, the responsibility of achieving sustainability targets will be reliant on sub regional objectives and decisions falling to other adjacent local authorities.
- 3.1.3 The principal findings of the Draft SA for the Development Management Issues and Options stage suggests that the overall impact of the proposed policy options is positive, particularly in terms of economic development; environmental protection and enhancement, and their contribution to increased social cohesion in Waltham Forest.

3.4 SUMMARY OF FINDINGS FOR THE SA OF VISION & STRATEGIC OPTIONS

3.4.1 A detailed SA of the Strategic Objectives is contained within Appendix 1, although the key outcomes and findings are contained within the following paragraphs. Overall, it is considered that the draft strategic objectives are generally very successful in seeking to achieve sustainable development. As a whole, they cover all the necessary elements of sustainability and contribute positively towards achieving this. There are not considered to be any significant conflicts between the DPD objectives and the sustainability framework, nor have any serious internal conflicts between DPD objectives been identified. Table 4.2 (overleaf) illustrates the cumulative effect of the Development Management Policies on the SA Framework.

3.5 Summary of Strategic Objectives Impacts

3.5.1 Social Impacts

3.5.2 Taken collectively the policy options have considerable positive social impacts. There are several options that aim to address key social issues including affordable housing, health and employment opportunities and avoiding polarisation throughout the borough. These objectives meet several of the specific requirements set out in the SA framework, including promoting provision of high quality affordable housing, promoting a healthy safe community, ensuring accessing to local facilities and open space and tackling poverty and social exclusion.

3.5.3 In addition to these direct positive impacts, there are a number of proposed options that will indirectly affect social elements of sustainable development. For example, objectives that seek to improve and protect open spaces and to promote high quality sustainable design and improvements to places and streets will enhance the local environment, thereby helping to improve people's health (both physical and mental) and quality of life. Objectives to promote sustainable transport will ensure better access for all residents and objectives to protect and strengthen town centres in Waltham Forest will improve resident's access to shopping and other required services such as medical supplies, post offices, banking services etc.

3.5.4 Environmental Impacts

- 3.5.5 From the appraisal it is clear that the proposed options will contribute significantly to achieving the environmental aims of the sustainability framework. The Vision aims to make Waltham Forest 'The Greenest Borough in London' and has a number of supporting objectives that seek to protect open spaces, improve air quality, reduce waste, energy and water inefficiencies, minimise flood risk, promote high quality and sustainable design, reducing contamination by re-using brownfield land etc.
- 3.5.6 As well as having positive environmental effects, ostensibly 'green' policy proposals to protect open space and green belt land will have positive economic and social effects. It will ensure future development is directed to the most sustainable locations and reinforce town centre policies to make the best use of previously developed land in these areas. This should contribute to increased diversity in town centre offer and offer greater employment opportunities in the borough as well as offer greater accessibility to residents to a greater number of services.

3.5.7 Economic Impacts

- 3.5.8 All proposed policies appear to have a positive impact on the economic SA objectives. There are a number of objectives pertaining to increasing the skills and employability of Waltham Forest's residents which should have a positive impact on both enabling residents to attain quality, high paid jobs and attracting inward investment into the borough due to a highly skilled pool of workers. This will have positive ramifications for employment levels and the vitality and viability of the boroughs town centres in terms of a greater number of people with access to disposable incomes.
- 3.5.9 The economic impacts of the strategic development management policy approaches will also have positive ramifications on environmental and social objectives. A compact, diversified town centre approach will have positive impacts on reducing the need for travel and subsequently improve emission levels and air quality. Similarly a highly diversified economy will offer increased array of services e.g. health and leisure that will be instrumental in reducing local deprivation levels.

3.6 Conclusion

- 3.6.1 It is considered that the findings contained in this report will help to advance the sustainability credentials of the draft strategic objectives and subsequently have a positive influence on the development and refinement of options for the Development Management Policies DPD process. The proposed policies perform well against the SA Framework in general terms and negative impacts that have been identified are common to areas planning for growth. It is considered that the overall approach taken by the DPD and mitigation measures

proposed in the document will enhance Waltham Forest's ability to adapt to and minimise the negative impacts identified.

- 3.6.2 In particular, the recommendations, which highlight areas where special care will need to be taken, will help to ensure potential conflicts are avoided. The results of this appraisal should also provide a good basis for determining whether or not a potential option is likely to advance the principles of sustainability, something that the draft strategic objectives are considered overall to do particularly well. It will be important that the policies contained within the DPDs help to implement the strategic objectives, building on their success in seeking to achieve sustainable development.

3.8 Summary of Draft policy's approach and its impact on the SA Framework

3.8.1 The SA found that for the most part, the proposed policies were likely to progress the SA Objectives, but that in a limited amount of cases some policies could be strengthened to have more beneficial sustainability effects, and in particular to attempt to offset the significant environmental effect of substantial growth in the Borough. The overall policy approach taken by the Issues and Options document generally may be summarised as follows.

- All new development will be required to follow high quality urban and sustainable design and construction principles, considering need for new buildings, location, best use of land, reducing impacts on environment, best use of resources, use of renewable energy and achieving high environmental standards. Sustainable transport and travel patterns will be essential to reducing impacts on the local area. The additional cost to developers of implementing these requirements may be initially prohibitive (leading to a possible negative impact on housing supply in Waltham Forest) however the long-term benefits are considered to out-weigh the negatives.
- The Borough will be required to provide more dwellings (760 units as per the requirements set by the GLA), including affordable homes and decide where to locate them. Ideally they should be built on previously developed (brownfield) land. They should not harm acknowledged nature conservation, landscape, townscape, or environmental interests. They should be on sites within walking or cycling distance of existing or planned facilities and employment, thereby reducing reliance on the car. Preferably the housing location should be well served by public transport. A sustainable option for housing would propose to mix houses with essential services on previously developed land in or near town and district centres.
- Green open areas and corridors are integral to key environmental processes and help to improve air quality, maintain soil quality, provide drainage and are vital to encourage and enhance biodiversity. The open environment and river corridors will continue to be enhanced and protected. Broad measures to reduce risk from flooding and restricting development in floodplains are proposed but it is likely that the further guidance will be issued through the Preferred Options stages of the Site Specific Allocations and the Development Management Policies DPDs and/or assessed on a site-by-site basis.
- There are pockets of deprivation within the Borough particularly in the southern wards. Local community and health facilities,

infrastructure and services will be provided near to where they are needed, especially in areas of relative deprivation. Sufficient high quality education and training will benefit personal well-being and support the local economy. This would be implemented by the Council in conjunction with a large number of different partners to seek to reduce disadvantage and ensure a range of opportunities are provided to create cohesive and healthy communities.

- Locations with good public transport accessibility such as Walthamstow and Blackhorse Lane should be exploited by concentrating uses which attract a lot of people such as larger offices, in these locations. A mix of uses is important to maintain viability and vitality of the town and local centres. It is critically important to strike a balance between protecting the environment (particularly the Natura 2000 sites, floodplains, important biodiversity areas etc) and enabling the economy to thrive.
- Some negative impacts were identified in relation to policies 1, 2, 4, 8, 11 and for the most part, relate to environmental issues. These were largely attributed to the likely impact that increased spatial growth and attendant development pressures will lead to an increased demand for energy and water and result in additional waste in the borough. The potential impacts on flood risk, biodiversity and Natural 2000 sites (particularly in the Blackhorse Lane and North Olympic Fringe area) will need to be examined both in terms of a borough-wide assessment and in the case of individual applications on a case-by-case basis. However as many of these relate to the potential impacts of new development it is generally considered that there are mitigation measures identified that could be put in place to address these. These mitigation measures are outlined below in table 3.1.

3.9 Proposed Mitigation Measures

3.9.1 As well as identifying possible negative impacts as a result of the draft policies and objectives, Council is required to identify mitigation measures that could off-set these potential impacts. The table below sets out the proposed mitigation measures which have been identified to overcome the negative sustainability issues identified.

Table 1.1 Table of proposed Mitigation Measures

Table of Proposed Mitigation Measures	
Sustainability Issue	Proposed Mitigation Measures
Increased number of homes and business/employment within the Borough could lead to increased waste, increased noise and light pollution and increased flood risk as well as placing pressure on water supply.	<p>Ensure that waste is managed in accordance with the waste hierarchy and North London Waste Plan and that new developments are designed to reduce noise and light pollution and surface water run-off.</p> <p>Businesses & homes should be encouraged to reduce, reuse and recycle</p> <p>Pay close attention to the findings of the Strategic Flood Risk Assessment when allocating sites for new development.</p>
Focusing development on brownfield sites could have a detrimental impact on biodiversity.	<p>Assessments will be carried out on those sites which are progressed in order to understand their biodiversity value.</p> <p>Redevelopment may afford the opportunity to remediate contamination and increase biodiversity in some cases</p> <p>Biodiversity contributions will be sought as part of a package of Section 106 measures where appropriate.</p>
Increased noise, air and light pollution in Town Centres as a result of focusing employment and retail growth in these areas.	Ensure that new developments are designed to reduce noise and light pollution and ensure that public transport is improved as a way to reduce congestion within this area.
Focusing development in some of Boroughs centres e.g. Blackhorse Lane could exacerbate flood risk.	Ensure that the SFRA is fully considered when allocating sites for development.

	Development of sites within floodplains will be required to demonstrate how they will minimise flood risk
Increased noise and light pollution as a result of new development.	This will depend on exact locations and design. At the strategic level, the Core Strategy should promote high quality design which reduces impact on its surroundings.
New development could place pressure on the historic environment, particularly within the town centres.	Any proposals must take account of Conservation Areas and Listed Buildings and the Core Strategy seeks to safeguard the historic environment through the ' Core Policy Area.
Requiring increased levels of affordable housing may impact on the economic viability of sites and result in them being left undeveloped, thus having a detrimental impact on regeneration.	An economic viability assessment will be undertaken and the final levels of affordable housing required will reflect its findings.
Design out Crime (or similar) standards may conflict with the existing townscape and built heritage, reduce opportunities to increase vegetation and tree planting and increase light pollution.	This should be assessed for potential impacts on a site-by-site basis or at pre-planning application stage.
Increasing the Boroughs level of renewable energy production from both on-site standalone provision may have a detrimental impact on the landscape/townscape.	This will be addressed at the site specific level. Where on-site provision is required, this will need to be sensitively incorporated into a schemes design and where standalone renewable energy developments are proposed any sites considered will undergo Sustainability Appraisal through the Site Specific Allocations and Development Management Policies DPD.
Seeking to safeguard the landscape may conflict with increasing the supply of renewable energy within the Borough.	This issue will need to be considered on a site-by-site basis through the preferred Options stages Site Specific Allocations and Development Management Policies DPD.
Increasing the focus on greenspaces within the Borough and promoting their use as walking and cycling corridors could create demand for these	Should it be considered necessary to light such spaces, sensitive designs which reduce light pollution and solar powered lighting will need to be considered in order to minimise impact.

spaces to be lit, leading to increased noise and light pollution.	
An increase in allotment provision could have a detrimental impact on the landscape and townscape of the Borough	Allotment sites will be carefully selected through the Site Allocations and Policies DPD. Each site will undergo sustainability appraisal. All developments will need to comply with advice set out within the Design SPG.
Requiring a range of developer contributions and sustainable design standards could impact on the economic viability of sites, thus having a detrimental impact on regeneration by leaving brownfield sites undeveloped.	The developer contributions required will be negotiated on a site-by-site basis taking the economic viability of the site

3.9.2 Uncertainties and Risks

3.9.3 Sustainability Appraisal is an uncertain process which requires assumptions to be made regarding the impacts of the policies proposed on the basis of limited or inadequate data. Most of the impact predictions made in this report are therefore subject to some uncertainty and entail risks.

3.9.4 There are two main uncertainties within the report. Firstly, the limited availability of baseline data in some cases makes it difficult to identify the current situation and the likely impact future development may have. The Development Management Policies DPD will be subject to a comprehensive Sustainability Appraisal in order to identify and mitigate against sustainability impacts on a site-by-site basis.

3.9.5 Uncertainties relating to baseline data will be resolved through monitoring. Uncertainties associated with impact prediction will be addressed at the planning application stage where more specific information is available and the actual impacts can be identified. Some impacts will be more clearly identified and mitigated against through the Blackhorse Lane, North Olympic Fringe and Walthamstow Town Centre Area Action Plan DPDs.

3.9.6 Habitat Regulations Assessment

3.9.7 Due to statutory obligations and the specialist nature of the assessment, Council will produce a Habitat Regulations Assessment which should better determine how the proposed policies will affect these areas.

Appendix 1 The Appraisal

Development Management Theme 1: Improving Housing Quality and Choice

All proposed policies in this section are concerned with meeting the Council's housing targets, quality objectives and providing suitable accommodation for its residents will have generally positive impacts on the sustainability framework objective to meet the Borough's housing needs. The proposed policies are expected to enable a wide range of tools to be employed in order for the Council to meet its statutory London Plan targets and aim to encourage the most efficient use of suitable land available for housing in the Borough through the proposed implementation of design and amenity standards, viability testing, measures to protect family housing stocks in areas where need is identified and proposing to ensure that higher densities are built where they are most appropriate i.e. in town centres and near public transport nodes.

It is also expected to have a wider positive effect on reducing crime in Waltham Forest and deprivation levels (by reducing social tensions) and on health (by providing suitable accommodation to meet the varying needs of its residents). The provision of additional housing in the Borough is also expected to maintain and enhance the local economy as additional residents will mean that there is an additional demand for local goods and services.

The proposals to maximise land available for housing by using small sites, vacant housing units and freeing up Council land have generally positive impacts on making the best use of previously development land and have a range of environmental benefits relating to reducing the need for developing on green belt and open space land, reusing materials, remediating possibly contaminated land and offering possibilities to use sustainable designs in terms of new design and retrofitting existing properties. However a 'residential only' focus for some sites may result in land being favoured for residential to the detriment of employment uses or community services etc.

The additional provision of homes in the Borough however is likely to lead to additional levels of waste, water and energy consumption. The Council may also find it difficult to maximise supply of developable land for housing without using some greenfield land which would have a number of negative sustainability impacts. In addition, an over-reliance on small sites to achieve housing targets may result in residential amenity being compromised in some circumstances, therefore a site-by-site analysis will be required to ensure against this.

However it is expected that these majority of these negative effects can be mitigated against through the application of new technologies such as sustainable construction methods (e.g. Lifetime Home Standards) and through adherence to the waste hierarchy. Provision of more housing, especially where it meets the needs of particular groups, including those with specialist housing needs, brings benefits which should outweigh the negative

impacts in terms of pollution and greater use of resources particularly if mitigation factors are included. In any case, housing growth is anticipated by the London Plan which Waltham Forest Council is required to be in general conformity with and adhere to the housing targets set for it by the Greater London Authority.

Development Management Theme 2: Create an Economically Balanced population

All policy options seek to attempt to ensure that there is a range and consistent supply of employment land for existing and expected growth industries in the Borough which should have positive effects on the Boroughs local economy, employment levels and attempts to attract inward investment to Waltham Forest. There are proposals to develop suitable sites for new industries and emerging opportunities such as those offered in the 'green economy' and the emerging creative/cultural sector as well as other more traditional types of industry found in Strategic Industrial Land (SILs) and for SMEs .

Policy approaches to attempt to try and meet the needs of local businesses (both existing and expected newer ones) may result in increased resident access to high quality education and training to ensure that a match between skills and jobs is achievable thereby having a knock-on effect for improving educational attainment in schools and access to training. It is assumed that the locations will be in the most accessible locations for sustainable transport e.g. offices in town centres and this will have a positive effect on the; re-use of previously developed land in these areas; improved local air quality through reduction in the amount traffic based emissions; and avoidance of green belt and open space and floodplain areas. Through clustering of businesses, there may also be opportunities to reduce waste and encourage joint synergistic recycling attempts. 'Enhancing' employment land options is likely to result in improved landscaping and provide opportunities for increased biodiversity e.g. roof gardens particularly if this employment is likely to change from heavy industrial uses to office or tertiary services and encourage 'good neighbourhood' uses where appropriate.

The intensifying employment land however is likely to result in an increased demand on energy and water supplies that will need to be assessed on a site-by-site basis and the ability of technology to ensure a more efficient use e.g. on-site CHP station which will likely be needed to be assessed at the application stage.

Development Management Theme 3: Cultivate civic participation, cohesion and independent living so everyone feels they belong.

The policy options proposed in this chapter tends to have strong positive generally social impacts particularly regarding reducing deprivation levels. Mixed, balanced areas with reduced polarisation should help to improve community safety as people will not tend to feel excluded but more a part of the community and therefore less likely to commit crime against other members of their community. There is a strong emphasis on accessibility, social facilities are proposed in areas of identified need and in areas of high public transport accessibility which will have positive effects on reducing the need to travel and local pollution levels etc. The emphasis is on 'front-loading' social infrastructure- mainly through the use of section 106 agreements; which should ensure that necessary facilities are built for use when they are needed rather than risk the unwanted scenario of 'housing before infrastructure'.

All policy options explore the likely provision of social and green infrastructure (schools, health services, additional parks etc) in proximity to where it is most need is has obvious positive impacts on the SA framework regarding; health, increase the provision of and access to community facilities to meet local cultural, recreational and social needs; Improve opportunities for access to education and training for all resident; Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system;. The option to co-locate facilities has additional benefits in terms of make the best use of previously developed land. While the option to retain existing social infrastructure is admirable, some schools, libraries etc may be currently sub-standard or located in poorly accessible locations and therefore a robust inventory and assessment of these should be undertaken before applying strict controls on their potential removal or relocation.

A more safe and accessible Borough is likely to result in more people walking and cycling with subsequent positive reinforcing impacts for reducing pollution levels, energy consumption and improving health (through both incidental exercise and in terms of access to facilities). The delivery of green infrastructure should have a positive knock on effect for increasing biodiversity; protecting and enhancing open spaces; and conserving and enhancing the natural environment. Similarly a balanced, safe and well designed community is more likely to attract inward investment and employment opportunities and make the boroughs centres more vital and viable.

Recommendation

That a reference to undertaking a rigorous and robust assessment of existing community facilities will occur before applying a policy that seeks blanket protection of all existing facilities.

Development Management Theme 4: Minimising Climate Change and reducing CO2.

All policy options proposed relate to a wide range of measures relating to adapting to and reducing the effects of climate change in terms of reducing CO2 levels, encouraging sustainable design, promoting biodiversity, protecting open space and promoting the sustainable waste management practices. The measures range in terms of impacts relating to the extent and stringency of standards proposed.

All proposed options should have numerous positive impacts on the SA Framework particularly in terms of energy and water conservation, air quality and waste. Proposed development policies that encourage reuse of materials will ensure that less non-renewable resources are required and waste is reduced. Similarly, open spaces, Natura 2000 sites and floodplains would be protected and sustainable designs could incorporate additional biodiversity opportunities through green roofs, soft landscaping etc. A concerted effort to reduce pollution would have a positive impact on air quality

The policy options look to encourage sustainable patterns of development (reducing car parking levels, encouraging mixed-use development etc) would imply that brownfield land and town centre location is favoured allowing best use of previously developed land and buildings and accessible by sustainable transport. This would have positive impacts on town centre viability and vitality, local employment levels and ability to attract modern employers. Remediation of brownfield land in these locations will have positive impacts for soil quality and possibilities of further biodiversity opportunities. In a social context improved access to services, open spaces and a reduction in local pollution levels will have a positive multiplier effect on resident's health and welfare.

There may be a slight possibility of conflict between the objective to incorporate sustainable designs and the objective to provide a range of housing in the borough as the additional cost to developers (e.g. a requirement to include SUDS) may be prohibitive and subsequently reduce the amount of new homes in the Borough. Similarly new forms of sustainable construction and design or 'retro-fitting' for example double glazing windows may also conflict with townscape character or conservation areas as older buildings are traditionally less energy efficient. However the long-term benefits outweigh the short term costs (in terms of the future costs of failure to enact environmentally-friendly designs)

Development Management Theme 5: Provide young people with skills

The policy options proposed in this section have largely positive social, environmental and economic impacts. Policy options are concerned with providing sufficient and quality school place accommodation and facilities.

The provision of new schools is directed to locations that are easily accessible by public transport and buildings are expected to be constructed to high sustainable design standards. The proposed use of school facilities after hours of operation for community facilities (and preference for community uses in case of redundant school sites) represents an efficient use of land and may contribute to healthier lifestyles if used for sport and recreational purposes.

If residents are provided with good quality of education it should have the effect reducing inequalities and deprivation and increasing opportunities for everyone will directly tackle poverty and social exclusion in Waltham Forest. Reducing inequalities through improving the quality of education will have a very positive economic impact for Waltham Forest, as more local people will be able to actively participate in the economy, reducing unemployment with improved job prospects and income capacity. Employers and new businesses are more likely to locate in Waltham Forest due to the supply of skilled labour also reinforcing the vitality and viability of the boroughs centres.

Development Management Theme 6: Maximising Employment Opportunities

The emphasis of the policy options proposed is to ensure that employment opportunities are accessible by ensuring a match between skills and available jobs in the Borough through the use of a range of policy approaches such as securing local labour agreements, promoting SMEs, enabling use of more training options and venues through relaxation of planning controls and targeting long-term unemployment.

The policy options proposed in this chapter have very similar social and economic impacts positive to development management theme 5 (above) and has the effect of reducing inequalities and local deprivation by opening up access to employment opportunities. A subsequent long-term benefit will be to the local economy should accrue as better educated and trained residents will have improved accessibility to high quality jobs and disposable incomes. Employment opportunities are slated to be created in areas of high PTAL ratings such as town centres and major regeneration areas where funding for public transport projects may be more readily available thus having additional environmental benefits in terms reducing the need for private travel.

Development Management Theme 7: Ensure residents are Fit and Healthy

Policy approach options listed in this chapter are considered to have mostly positive social and environmental impacts. In terms of the SA Framework, its is particularly relevant to the SA objective to; improve standard of health and wellbeing of those who live and work in the Borough and reducing the overall level of deprivation.

Development policies that advocate protecting and enhancing and delivering new open spaces and landscapes have a positive impact on air quality and reducing emissions; conserving and enhancing biodiversity; protecting the ecological integrity of Natura 2000 sites; maintain and enhance the quality of the green belt and open space areas; reducing flood risk, maintain and enhance the historic built and natural environment and make the best use of previously developed land. This is due to the fact that if green spaces are protected and are unsuitable for development than a more efficient use of brownfield land will occur. Improvements to open spaces will make them more attractive and safe; thereby encourage their use for outdoor activity and exercise and improving people's health and feelings of safety.

Advocating policy options looking to ensure that residents are protected from exposure to pollutants and 'bad neighbour' uses ensures good health and high amenity levels, resulting in the Borough becoming a more attractive place to live and work and having a positive knock on effect in attracting businesses to locate there. Similarly encouraging access to better quality medical centres and affordable nutritious food should augment Waltham Forest's reputation as a 'green and healthy borough'.

Development Management Theme 8 – Vibrant Town Centres

The policy options proposed in this section is likely to have positive environmental, social and economic impacts. The options can be construed as advocating a 'town centre' approach that seeks to strengthen and diversify the offer of all centres. Focusing a range of development opportunities in Walthamstow and other centres is likely to greatly enhance the viability and vitality of these areas as well as creating additional employment, shopping and service provision. A mix of uses is more sustainable in the long-run as the centres will not be overly-reliant on one type of employment. New residents, office workers and visitors can help support the retail economy. There are likely benefits in terms of social infrastructure as additional health, leisure and services are likely to be attracted to locate in these areas and increased footfall and should result in a safer environment.

The environmental benefits accrued relate to the fact that the provision of a range of facilities close to home will reduce the need to travel. A town centre approach is likely to have positive effects for the re-use of previously developed land and buildings and subsequently protecting green belt and open space areas. The objective enhance will give opportunity to improve the local built and natural environment (giving further opportunities for diversity) particularly in Walthamstow, Blackhorse Lane and the North Olympic Fringe Area. Public realm and traffic improvements could help reduce dominance of vehicles on the town centre environment and lead to healthier lifestyles through an increase in incidental exercise.

An increase in development in these areas is likely to lead to increased waste and place an additional strain on the demand for energy and water at least in the short-term. However this may be off-set somewhat by employing more efficient energy and water-saving technologies in the design of new buildings etc and collective waste management strategies.

Development Management Theme 9 – Transform Design and Quality of Public Space

The policy options suggested in this section are likely to have positive social and environment positive impacts in particular and directly impacts the SA objective to conserve and enhance the historic built and natural environment. Well designed and sustainable places and developments will greatly enhance the urban environment and add to people's quality of life.

It should also have a positive effect on the following SA Framework objectives: make the best use of previously developed land and buildings and maintaining the quality of open space areas. 'Inclusive environments' would suggest that walking and cycling are prioritised having a positive effect on reducing energy use, improving air quality and health. This would also have positive implications for improving the accessibility to essential services and community facilities. This will reduce local deprivation levels and should have a positive effect on reducing crime levels through increased footfall of these areas.

Attractive places and streets help create a more appealing urban environment, helping to create vibrant places helping to attract business and visitors to the borough, helping sustain the local economy. Similarly the Boroughs built heritage e.g. through conservation areas may lead to an increase in tourism helping to diversify the economy and create new jobs.

Development Management Theme 10- Improving Community Safety

The proposed policies in this chapter generally score well in a high number of SA Framework objectives. The objective implies that there will be direct positive impact on the SA Objective to; reducing crime and the fear of crime; and the

Efforts to reduce crime and shape an accessible inclusive community also implies the following; increase the provision of and access to community facilities to meet local cultural, recreational and social needs improving the standard of health and well being of those in the Borough;; reduce the overall level of deprivation; improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system.

Ensuring an adequate supply of the right type of housing for the varying needs of the Boroughs residents will also be a key aim of this objective to promote 'inclusiveness'.

The also implies that there will there will be a concerted effort to reduce private travel in the Borough presumably through improved cycling, walking and public transport provision and also an ability to manage resources efficiently. This will have positive impacts on reducing greenhouse gas emissions, reducing (and recycling) waste; conserving energy; improving air quality through a reduction in traffic-based emissions. In order to achieve this it will be necessary to make a more efficient use of land (particularly in or near town and local centres). Likely positive impacts of this include; better use of PDL and existing buildings; reducing contamination and safeguarding soil quality and quantity, conserving and enhancing biodiversity, maintaining the quality of the green belt and open space areas and conserving and enhancing the historic and built environment.

A 'sustainable community' is one with an established and vital local economy which will support employment and attract investment thereby scoring well in economic SA framework terms. There are no negative implications or impacts identified with this objective.

Development Management Theme 11 - Making the Most of regeneration

There are many potentially positive impacts from the policy approach options suggested in this chapter. A partnership approach is suggested with adjacent London Boroughs such as Haringey and Hackney that is consistent with London Plan objectives should ensure that residents living in those 'border' areas are fully considered in major regeneration strategies.

Concentrating regeneration efforts in the Area Action Plan (AAP) areas of the Borough that urgently require the most intervention could have a positive impact on the tackling local deprivation levels, re-using old housing stock and creating new residential units, and improving access to health, leisure and community facilities. Using the AAP process, policies for key development sites in these areas may allow the use of more appropriate and place-specific assessments than would be the case of an over-arching development management policy.

The policy also prioritises a new rail route between Chingford and Stratford which should have a positive long term impact in terms of sustainable transport, air quality and emissions in the Borough. The 2012 Olympics are a major catalyst for regeneration in the southern part of the Borough and the provision of, and access to new sports and leisure facilities are expected to have positive impacts on access to open space and obvious health benefits accruing from this. Similarly upgrading of the Hackney Marshes and is likely to result in a coordinated upgrading of cycling and pedestrian linkages as well as increased public transport provision in areas of Waltham Forest that will

encourage access to the new facilities. Planned upgrading of the Lee Valley Park and other open spaces will have positive impacts on biodiversity, local air quality and improving the natural environment.

The unknown impacts at this stage relate to the effect that the new Stratford City development will have on the vitality and viability of the Boroughs centres and retail parades. It is likely that Waltham Forest will have to focus on more specialised markets and employment than that of Stratford rather to try to compete with it directly. Regeneration of local centres in the North Olympic Fringe area such as Leyton and Leytonstone should have a positive impact, however some residents particularly in the South of the Borough for example, may find (higher order) comparison shopping and leisure more attractive to do in Stratford than in Leyton or Walthamstow particularly if it is now more easily accessible due in part to the reopening of the Hall Farm Curve and Lea Bridge station. With regard to water, flood risk, increased waste and energy consumption the impacts of this policy will depend on the type of developments that come forward, where they are sited and on their design and construction but it is likely to lead to an increase in negative impacts in the short run. There is also an implicit danger that by concentrating regeneration efforts in the AAP areas that some pockets of deprivation elsewhere in the Borough may be relatively ignored.