



Sustainability Appraisal (SA) of the Walthamstow Area Action Plan

SA Report Addendum

February 2014

UNITED
KINGDOM &
IRELAND



Prepared for:



REVISION SCHEDULE

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		February 2013			

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1 INTRODUCTION

1.1 Background

1.1.1 London Borough of Waltham Forest submitted the Walthamstow Town Centre Area Action Plan (AAP) to the Secretary of State for Communities and Local Government on 27 September 2013. Following submission, Mr Paul Crysell BSC, MSC, MRTPI was appointed as Planning Inspector to oversee the AAP's Examination in Public.

1.1.2 As a result of representations received during the publication period, and discussions at the Examination, the Inspector instructed that there was a need to make a number of 'Main Modifications' (henceforth 'Modifications') to the Part JCS. Proposed Modifications have been prepared and are published at the current time so that representations might be received.

1.2 This SA Report Addendum

1.2.1 This SA Report Addendum is published alongside the Modifications with a view to informing representations and plan finalisation. First and foremost, this SA Report Addendum presents an appraisal of the Modifications, with a view to ascertaining whether they will result in any significant effects in terms of sustainability issues/objectives. Furthermore, consideration is given to the effects of 'the AAP as modified', i.e. consideration is given to updating the appraisal findings presented within the Walthamstow Town Centre AAP SA Report (September 2013).

Reasonable alternatives

1.2.2 The 2013 SA Report explains in detail how the AAP was developed subsequent to appraisal of reasonable alternatives. Specifically, it explains how alternatives were appraised for a range of thematic, area-wide policy issues and also how alternative uses were appraised for a number of the opportunity sites within the plan area. Providing this information is important given regulatory requirements.¹

1.2.3 The work to develop Modifications did not give rise to a ('reasonable') need to appraise alternatives and hence no information about alternatives is presented in this report. The Modifications seek only to 'fine tune' the plan. There is no overarching issue being addressed by the Modifications, nor any 'common thread' running through them. Rather, each Modification is largely stand-alone, and there is no reason to suggest that any one Modification is of particular significance (from a sustainability perspective) and hence necessitates justification via alternatives appraisal.

1.2.4 It is important to emphasise that this is an Addendum to the 2013 SA Report, and hence the two should be read together. At the time of AAP adoption an 'SA Statement' will be published that explains in full how the AAP (as modified) is justified on the basis of reasonable alternatives appraisal.

¹ In-line with the Environmental Assessment of Plans and Programmes Regulations (2004), the SA Report published alongside the draft plan must present an appraisal of 'reasonable alternatives' as well as 'an outline of the reasons for selecting the alternatives dealt with'.

2 APPRAISAL OF THE PROPOSED MODIFICATIONS

2.1 Methodology

2.1.1 The appraisal is structured under the ten ‘sustainability topic’ headings identified through SA scoping (and used to structure the appraisal findings within the SA Report):

- Air
- Biodiversity
- Crime and safety
- Employment and skills
- Human health
- Housing
- Landscape and townscapes
- Transport
- Community and wellbeing (inc. health)
- Waste

2.1.2 Listed under each topic heading is a list of sustainability ‘objectives’ and ‘issues’. Taken together, the sustainability topics, objectives and issues provide a methodological framework for the appraisal of likely significant effects on the baseline.

2.1.3 The focus of the appraisal is on ‘the Modifications’ (given that it is the Modifications that are currently the focus of consultation); however, explicit consideration is also given to the effects of ‘the AAP as modified’.

Screening the Modifications

2.1.4 Of the 18 Modifications that are proposed, the following can be ‘screened-out’, i.e. need not be a focus of appraisal:

- MM1 – relates to the inclusion of an ‘Area Wide Policies’ map; however, this is simply a means of presenting the policy approach. The effect of the Modification is not to alter the policy approach.
- MM10 – relates to the inclusion of a new figure showing the Archaeological Priority Zone in the town centre. The effect of the Modification is not to alter the policy approach.
- MM14 – proposes very minor alternations to the policy approach to Opportunity Site 3 - Former Petrol Station Hoe Street.
- MM18 - proposes very minor alternations to the policy approach to Opportunity Site 17 - St James Street Car Park.

2.2 Air

Relevant sustainability objectives

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

Relevant sustainability issues

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

Appraisal of the Modifications

2.2.1 Modifications with a bearing on 'air' related sustainability issues / objectives are as follows:

- MM6 deals with WTC6 (Transport Improvements). MM6 has the potential to encourage better integration of public transport provision within the existing townscape and encourage its use as an alternative to car use. Benefits in terms of air pollution / air quality are likely.
- MM7 deals with WTC7 (Sustainable Transport). MM7 promotes a range of improvements to ensure secure and attractive pedestrian and cycling infrastructure and improve permeability. Benefits in terms of air pollution / air quality are likely..
- MM8 deals with WTC8 (Car and Cycle Parking). Benefits are likely in terms of air quality issues/objectives given that the Modifications encourage reduced parking capacity and hence should encourage modal shift to more sustainable forms of transport.

Appraisal of the draft AAP (as submitted) plus Modifications

2.2.2 The SA Report submitted alongside the draft AAP (September 2013) concluded the following:

*"The area-wide policies collectively have the potential to bring about **positive effects** on the baseline in terms of this topic area. Policies WTC7 and WTC8 are expected to be particularly beneficial introducing sustainable transport methods. Policy WTC8 and the 'car free' environments will help to reduce congestion and car emissions.*

*The policy approach to the key sites is expected to generally have a **positive effect** with many sites being close to public transport. OS 10 and OS 17 propose development on car parks which will help to reduce people's dependence on the car as there are fewer places to park, encouraging public transport use and reducing overall emissions."*

2.2.3 The effect of the Modifications is to reinforce the positive effects identified in the SA Report. A consistent framework is set to be put in place for promoting increased provision and accessibility to public transport services as a method to encourage a reduction in traffic-based air pollution (including greenhouse gas emissions). The functionality of the town as a pedestrian and cycle friendly place has also been fostered through improvements to permeability, including pedestrian crossings and cycle links.

2.3 Biodiversity

Relevant sustainability objectives

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

Relevant sustainability issues

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

Appraisal of the Modifications

2.3.1 Modifications with a bearing on 'biodiversity' related sustainability issues / objectives are as follows:

- MM6 deals with WTC6 (Transport Improvements). MM6 is likely to positively aid the conservation and enhancement of biodiversity indirectly through reducing the reliance on private car use, and hence reducing air/noise pollution.
- MM7 deals with WTC7 (Sustainable Transport). The effect of improving pedestrian and cycle links could further reduce car reliance and hence reduce air/noise pollution.
- MM13 involves addition of the following statement (albeit within supporting text, as opposed to policy): *"While the Council seek to increase access to the Wetlands they also seek to ensure and protect against this having a detrimental impact on the area."* This is positive from a biodiversity perspective.
- MM15 will promote a benefit to biodiversity through the inclusion of 'Green Roofs' in the design of redevelopment proposals for the Selborne Walk Shopping Centre.

Appraisal of the draft AAP (as submitted) plus Modifications

2.3.2 The SA Report submitted alongside the draft AAP (September 2013) concluded the following:

*"There is not too much effect on biodiversity with the area wide policies, although policy WTC14 allows better access and WT10 offers the improvement of public green spaces which should have a **positive effect**."*

*In terms of the key sites there is potential for positive effects at OS 7 and OS 14. There is a likely **positive effect** at OS 8 with the extension of the Town Square gardens."*

2.3.3 The effect of the Modifications is to reinforce the positive effects identified, albeit indirectly and to a limited extent.

2.4 Crime and safety

Relevant sustainability objectives

- Reduce crime and the fear of crime

Relevant sustainability issues

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

Appraisal of the Modifications

2.4.1 Modifications with a bearing on 'crime and safety' related sustainability issues / objectives are as follows:

- MM2 deals with WTC2 (Housing Growth). MM2 promotes development in the town centre of Walthamstow and so could stimulate economic regeneration. The effect could be to reduce deprivation locally and associated crime / fear of crime.
- MM4 deals with WTC4 (Leisure, Entertainment, Culture and Tourism) and also supports WTC10 (High Quality Environment). Encouraging a people-friendly public realm and engaging active frontages promotes a culture of 'eyes on the street' and a diversification of the appeal of the centre that encourages positive use.

Appraisal of the draft AAP (as submitted) plus Modifications

2.4.2 The SA Report submitted alongside the draft AAP (September 2013) concluded the following:

*"There are no specific crime tackling policies although the development of vacant sites will help improve deprived areas. With increased activity and footfall there are likely to be **positive effects** in this regard."*

2.4.3 The effect of the Modifications is to reinforce these positive effects. Policies WTC2, WTC3 and WTC4 promote the increased development of new housing, retail, leisure and entertainment and the effect should be to nurture economic regeneration. Resultantly the town centre's newly found positive image and improved public realm, and diverse mixed-use offer for its visitors will contribute to a reduction in crime and fear of crime.

2.5

Economy

Relevant sustainability objectives

- Maintain and enhance the vitality and viability of the borough's town centres
- Improve the local economy by attracting inward investment
- Maintain stable levels of employment in the borough

Relevant sustainability issues

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

Appraisal of the Modifications

2.5.1 Modifications with a bearing on 'economy' related sustainability issues / objectives are as follows:

- MM2 deals with WTC2 (Housing Growth). MM2 will contribute to providing additional residential opportunities and in turn contribute to the local economy, including through ensuring a local labour supply.
- MM3 deals with WTC3 (Retail). MM3 deals with rolling out 'click and collect' initiatives to accommodate changing retail demands. As such, it ensures flexibility and addresses problems around loss of retail space in the shopping district. It should help with securing a diverse offer in the long term.
- Encouraging existing and prospective independent traders to locate in the St James Street Quarter should engender a more vibrant and unique Walthamstow for visitors and residents to enjoy, as well as creating additional employment opportunities. As well as WTC3, this Modification will support WTC4 (Leisure, Entertainment, Culture and Tourism) and WTC5 (Employment).
- MM4 deals with WTC4 (Leisure, Entertainment, Culture and Tourism). MM4 deals with acting to resist combining small individual units and enforcing active frontages to be in keeping with the street scene in the St James Street Quarter. The effect of these measures will be to encourage the proliferation of the distinctive 'Cultural Quarter' and enable place-based marketing practices based on the marketable aspects of people friendly public realm and civic and cultural infrastructure and attractions, to lead into economic investment into the area and wider use. MM4 will support Policies WTC3 (Retail), WTC9 (Design and Place Making) and WTC10 (High Quality Environment).
- MM15 deals with Opportunity Site 9 (Selborne Walk Shopping Centre). MM15 provides additional clarity to encouraging the future prosperity of the site, including through better recognising its prominence within the townscape, and by supporting the development of larger units. The effect should be to bring inward investment through new retailers and ultimately the effect should be to support the vitality of the town centre as a location.
- MM16 deals with Opportunity Site 15 (South Grove). MM16 will have the effect of drawing footfall into the South Grove area and revitalise this area by developing an anchor store, which would act as a signal to other retailers and businesses to locate in Walthamstow.
- MM17 deals with Opportunity Site 16 (Brunner Road Industrial Units). MM16 will enhance the overall vitality and viability of the town centre by removing 'retail' from the proposed uses for this area. The effect of this measure will be to ensure a retail focus on the High Street rather than the potential of creating a sub-town centre if coupled with proposals on the South Grove site, which would detract from the value of the retail core of Walthamstow

Appraisal of the draft AAP (as submitted) plus Modifications

- 2.5.2 The SA Report submitted alongside the draft AAP (September 2013) concluded the following:
- "There are many likely **positive effects** from the area wide policies and 12 opportunity sites propose employment generating uses. The large scale OS9 Selbourne Walk retail extension in particular has the potential to enhance the vitality and viability of the town centre."*
- 2.5.3 The effect of the Modifications should be to reinforce the positive effects identified in the original SA Report. In particular, it is suggested that expanding the retail offer will stimulate inward investment and improve the viability of the town centre for retail and other uses. It may even promote the vitality and viability of the town centre beyond traditional hours to support the night time economy. The need to improve and protect the streetscape and public realm via shop front improvements will give a significant boost to the appearance of the area, and so in turn will encourage new businesses to locate in the centre.

2.6 Employment and skills

Relevant sustainability objectives

- Improve educational attainment in schools
- Improve opportunities for access to education and training for all residents
- Reduce the overall level of deprivation
- Improve the local economy by attracting inward investment
- Maintain stable levels of employment in the borough

Relevant sustainability issues

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

Appraisal of the Modifications

2.6.1 Modifications with a bearing on 'employment and skills' related sustainability issues / objectives are as follows:

- MM2 deals with WTC2 (Housing Growth). MM2 will provide employment opportunities in Walthamstow through promoting mixed use development to include retail and restaurant uses.
- MM4 deals with WTC4 (Leisure, Entertainment, Culture and Tourism). The effect could be positive for encouraging inward investment and business location to Walthamstow resultant of the improvements to public realm and the streetscape boosting perceptions of the area.
- MM5 dictates that 10,000 sqm of commercial floor space will be promoted and this should enable employment opportunities within existing employment areas. In turn this should encourage business relocation to the centre. It is likely that placement and work experience opportunities for local residents will be provided, helping to boost skills levels in young people, including in service sector roles.
- MM16 deals with Opportunity Site 15 (South Grove). MM16 proposes an anchor store development to sustain South Grove. This should spur on inward investment and boost job creation in retail.

Appraisal of the draft AAP (as submitted) plus Modifications

2.6.2 The SA Report submitted alongside the draft AAP (September 2013) concluded:

*"The policies collectively have the potential to bring about **positive effects** on the baseline for employment and skills. 12 opportunity sites promote employment uses and there is the regeneration of the school in OS14 which will help local education levels. The retail expansion at OS9 will provide good economic activity and should stimulate growth in the centre."*

2.6.3 The effect of the Modifications is to further promote employment and skills opportunities for local residents. Employment opportunities are to be presented to residents at a variety of skill levels to coincide with the diverse population in the area. There is a significant level of retail development proposed on OS9 Selborne Walk and OS15 South Grove, both of which are a focus of Modifications. Several of the Opportunity Sites propose mixed-use developments to include A1 uses, adding further job opportunities locally albeit in lower skilled jobs.

2.7 Housing

Relevant Sustainability objectives

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

Relevant sustainability issues

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

Appraisal of the Modifications

2.7.1 Modifications with a bearing on 'housing' related sustainability issues / objectives are as follows:

- MM2 deals with policy WTC2 (Housing Growth). A table is set to be included that demonstrates how and when new homes in the town centre will be delivered. This is important from a perspective of generating confidence in housing supply. In turn there will be a tangible effect in terms of meeting housing needs.
- MM2 also removes support for Houses in Multiple Occupation (HMOs) above shops. This is essentially because the AAP is in a 'restricted conversions and HMO ward' so in accordance with Development Management policy HMOs should not be supported. Whilst there could be some negative implications (given that the Private Rented Sector is growing), resisting HMOs in Walthamstow Town Centre will better promote a 'mixed and balanced' community (given the existing large numbers of HMOs in the area).

Appraisal of the draft AAP (as submitted) plus Modifications

2.7.2 The SA Report submitted alongside the draft AAP (September 2013) concluded the following:

"In general the main area wide policies will support the housing aims, particularly WTC2 Housing Growth. 15 opportunity sites support residential development. This will have positive effects on the baseline and significantly contribute to the housing targets within the AAP boundary."

2.7.3 The effect of Modifications is to positively supplement Policy WTC2, ensuring that there is a secure land supply and helping to ensure a suitable housing mix. Support for HMOs above shops has been removed, but support for housing above shops in general (which represents efficient use of land and resources) remains. Other policies and modifications will combine with WTC2 with the effect that Walthamstow becomes a more desirable location in which to live, and remains a location where a wide range of residents are able to meet their housing needs.

2.8 Human health

Relevant Sustainability objectives

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

Relevant sustainability issues

- Life expectancy is lower than the average for London and the rest of the country.
- Health inequalities for Black and Minority Ethnic groups and the southern part of the borough is subject to higher levels of poor health associated with deprivation.

Appraisal of the Modifications

2.8.1 Modifications with a bearing on 'human health' related sustainability issues / objectives are as follows:

- MM2 deals with WTC2 (Housing Growth). MM2 will improve leisure and entertainment provision to a burgeoning population in central Walthamstow. It should support WTC4 (Leisure, Entertainment, Culture and Tourism). The effect should be to foster social cohesion and reduce exclusion.
- MM4 deals with WTC4 (Leisure, Entertainment, Culture and Tourism). MM4 should help with the provision services and facilities in the centre and support new opportunities for social infrastructure. The effect of this will be to improve the offering of facilities for the local and wider community to boost well-being.
- MM6 deals with WTC6 (Transport Improvements). MM6 offers the extension of current public transport facilities and new opportunities for pedestrians and cyclists within and around the town centre. This will positively impact upon health and well-being, including through supporting reduced pollution from traffic.
- MM8 deals with WTC8 (Car and Cycle Parking). MM8 will benefit human health directly by giving support to proposals that result in the loss of parking. This would encourage walking and cycling for town centre uses and improve air quality.
- MM9 deals with WTC11 (Shop Fronts). MM9 supplements policies WTC9 (Design and Place Making) and WTC10 (High Quality Environment) by adding measures to improve the street scene and public realm. The effect will be to encourage active engagement with the urban environment by its visitors and ensure health and stimulate well-being through access to high quality green infrastructure.
- MM15 deals with Opportunity Site 9 (Selborne Walk Shopping Centre). MM15 serves to benefit health and wellbeing through seeking accessibility to a public space as part of any proposed eastern extension to the Shopping Centre.

Appraisal of the draft AAP (as submitted) plus Modifications

The SA Report submitted alongside the draft AAP (September 2013) concluded: *"Overall the policies show there will be positive effects on the human health topic. This is particularly due to sustainable transports measures and reducing the reliance of the car. All developments have good provision of public transport, particularly the areas of residential development such as OS10 and OS17."*

2.8.2 The Modifications strongly support the notion of encouraging human health in Walthamstow and at a wider borough-level. The outcome of policies to reduce reliance on private car should be to make Walthamstow more walkable and cycle-friendly. Retaining existing facilities in the centre amidst the creation of a 'critical mass' of new residential, retail, leisure and commercial uses serviced by a strong public transport service system is a positive step to encourage a sustainable future.

2.9 Landscape and townscapes

Relevant Sustainability objectives

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

Relevant sustainability issues

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

Appraisal of the Modifications

2.9.1 Modifications with a bearing on 'landscape and townscape' related sustainability issues / objectives are as follows:

- MM3 deals with WTC3 (Retail). MM3 would supplement Policy WTC9 (Design and Place Making) and WTC 10 (High Quality Environment) by ensuring all proposed uses in the 'Shopping Precinct' contribute to the regeneration objectives, aspirations and priorities of Walthamstow Town Centre.
- MM4 deals with WTC4 (Leisure, Entertainment, Culture and Tourism). MM4 will help to ensure the protection of the existing character and context of the town centre's image through committing the Council to resist A2 frontages in the 'Cultural Quarter,' reinforcing heritage assets and actively seeking a people friendly public realm.
- MM9 deals with WTC11 (Shop Fronts), applying stringent principles to new shop fronts within the AAP area. The effect of these measures will be to enhance shop fronts and enhance the quality of the built environment.
- MM12 deals with building heights. MM12 will aim to ensure that schemes are sensitive to local character and context. A plan-led approach to assessing proposed schemes should benefit the existing landscape and townscape prevalent in Walthamstow.
- MM15 deals with Opportunity Site 9 (Selborne Walk Shopping Centre). It should positively supplement the landscape of Walthamstow, through fostering the creation of publicly accessible space within redevelopment schemes at the Shopping Centre.

Appraisal of the draft AAP (as submitted) plus Modifications

2.9.2 The SA Report submitted alongside the draft AAP (September 2013) concluded the following:

*"Collectively these policies should have a **positive effect** on the baseline in relation to this topic area. OS5 proposes to retain the listed cinema building and bring it into better use."*

2.9.3 The Modifications give added emphasis to the importance paid to high quality townscapes and landscapes in Walthamstow. The Modifications are geared towards raising the quality of design and encouraging new forms of development in the Borough, via a plan-led approach to assessing each development scheme. These policies should ensure that any development proposal, regardless of mass and height, is sympathetic in scale to the existing townscape. Adding measures to detail the protection to shop fronts gives further support to this endeavour.

2.10 Transport

Relevant Sustainability objectives

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

Relevant sustainability issues

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

Appraisal of the Modifications

2.10.1 Modifications with a bearing on 'transport' related sustainability issues / objectives are as follows:

- MM3 deals with policy WTC3 (Retail). Creating new employment opportunities within the town centre has the direct effect of promoting the use of public transport services given the accessible nature of the town centre.
- MM7 deals with policy WTC7 (Sustainable Transport). MM7 deals with improving cycle links to Walthamstow Village and Wetlands in a safe manner. Traffic calming measures of reducing speed limits would also slow traffic and benefit road user safety.
- MM8 deals with policy WTC8 (Car and Cycle Parking). MM8 deals with reducing parking provisions in the town centre of Walthamstow, and it is suggested that this is a positive step in-light of the sustainability objectives listed above.

Appraisal of the draft AAP (as submitted) plus Modifications

2.10.2 The SA Report submitted alongside the draft AAP (September 2013) concluded the following:

*"The area wide policies collectively have the potential to bring about **positive effects** on the baseline in terms of this topic area. There is provision for sustainable transport methods as well as improvements to pedestrian and cycle access. This will help reduce the over reliance of the car in the town centre.*

*The opportunity sites are all likely to bring about a positive effect to transport and accessibility. With all developments close to public transport and junction amendments planned where necessary. The accessibility through the AAP opportunity sites is set to be **wholly positive**."*

2.10.3 The effect of the Modifications will aid the implementation of Policies WTC6, WTC7 and WTC8. It will help to deliver the necessary transport infrastructure improvements and hence encourage sustainable forms of transport, tipping the balance away from private car use. The effect should be that Walthamstow becomes more attractive as a safe place for pedestrians and cyclists.

2.11 Waste

Relevant Sustainability objectives

- Reduce production of waste and increase recycling

Relevant sustainability issues

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

Appraisal of the Modifications

- 2.11.1 There are no Modifications with a bearing on 'waste' related sustainability issues / objectives prescribed by the Inspector in his report.

3 CONCLUSIONS AT THIS CURRENT STAGE

- 3.1.1 The conclusions presented within the 2013 SA Report are structured under three headings – 'A pro-growth approach', 'Improving the local environment' and 'Key opportunity sites' – and the overall conclusion reached is as follows:

"The policies and key opportunity sites brought forward in the AAP will contribute towards tackling key issues present within Walthamstow Town Centre. New retail, residential, leisure, entertainment and employment sites will be created to provide new employment and housing opportunities in the area. Furthermore, improvements proposed to public transport, pedestrian and cycling links within the Town Centre, along with improvements to the public realm, will enhance the vitality of the area. The Council has developed the preferred strategy in light of a detailed understanding of the various issues (sometimes competing) that exist and the implications of alternative approaches that might be taken."

- 3.1.2 The Modifications have been found to support the achievement of sustainability objectives, and no major negative effects / trade-offs have been identified. Particular benefits relate to the targeted approach to transport infrastructure improvements and retail development.

Monitoring

- 3.1.3 The 2013 SA Report proposes monitoring indicators in-light of appraisal findings. Given the appraisal findings presented in this SA Report Addendum, it is suggested that particular emphasis be given to monitoring the changing retail role of the town centre, and the implications of this for town centre vitality.

4 NEXT STEPS

- 4.1.1 The next step will be for the Inspector to consider the representations raised as part of the current consultation on Modifications, before deciding whether to hold further public hearings. The Inspector may come to the conclusion that it is possible to finalise the plan without further hearings.
- 4.1.2 Assuming that the Inspector is able to find the AAP 'sound', it will then be formally adopted by the Council. At the time of AAP adoption an 'SA Statement' will be published that explains the process of plan-making / SA in full and presents 'measures decided concerning monitoring'.