

Walthamstow Area Action Plan **Preferred Options Sustainability Appraisal**

Interim SA Report August 2011

Prepared for: London Borough of Waltham Forest





Revision Schedule

Walthamstow Area Action Plan Preferred Options Sustainability Appraisal

August 2011

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Introduction 1

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.

Sustainability Appraisal (SA) 1.2

1.1.4 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.

1.3 The Walthamstow AAP

- 1.3.1 Walthamstow Town Centre is a vibrant urban centre that boasts a diverse community and historic buildings, and which is proving increasingly popular with commuters wishing to take advantage of the centre's excellent public transport links. Walthamstow is at the heart of the borough of Waltham Forest, both geographically and economically. It is the Borough's main commercial centre, driving the economy and attracting visitors. Walthamstow provides homes, employment, retail, services and leisure opportunities for a large number of people and will play an important role in accommodating future growth in the Borough.
- 1.3.2 However, while Walthamstow has a number of strengths it also faces a number of challenges. The centre is under performing and has been in long-term commercial decline due to departing investment, population churn, a poor shopping offer and lack of competitiveness with neighbouring town centres. The aim is to reverse this decline and bring about the centre's regeneration. The Walthamstow Area Action Plan (AAP) will be an essential part of this process.
- 1.3.3 The AAP sets out the Council's vision for Walthamstow together with objectives, policies and site proposals to guide its future regeneration and growth over the next 15 years. The AAP aims to enhance Walthamstow's character and environment, provide new homes and improve the quality and range of facilities and services available to residents, businesses and visitors. The AAP also aims to revitalise deteriorating areas of the centre and identify the significant development sites and investment opportunities. The AAP will seek to celebrate the area's

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



past as well as and move forward, making the most of the unique development opportunities such as the renowned street market and an established creative community.

1.3.4 This AAP builds on the extensive work undertaken in partnership with the Prince's Foundation for the built environment to develop the Walthamstow Town Centre Masterplan and the Interim Planning Policy Framework (IPPF) adopted in 2008. The IPPF was adopted as a temporary framework to guide development in this town centre until the production of an AAP. The AAP has also been informed by the extensive consultation undertaken in the development of Walthamstow Town Centre Masterplan and the IPPF. The latest consultation took place in February and March 2011, when Council prepared a leaflet on the Walthamstow Town Centre Area giving stakeholders and local residents the opportunity to comment on the issues, strengths and weaknesses of the area. The Council has also presented at Ward Forums.

Objectives of the Area Action Plan

- 1.3.5 The following objectives have been developed as a basis for the detailed approach set out within the AAP:
 - (1) Promoting Walthamstow's **unique retail offer** by building on its historic market, high proportion of independent retailers, the large percentage of young population, and cultural diversity of the local community;
 - (2) Improving the quality of Walthamstow's retail offer by seeking to **improve the range and quality of goods sold** within the centre;
 - (3) Creating a vibrant, attractive and competitive town centre by encouraging **a wide mix of uses** such as new retail, leisure, tourism and community to ensure the centre is a place to shop, work, spend leisure time and live;
 - (4) Creating and establishing a sustainable neighbourhood by providing **a range of quality new homes** in terms of tenure, size and affordability to meet the housing needs of the local community:
 - (5) Improving **accessibility** to the centre by improving the quality and frequency of the existing transport network and promoting new transport improvements;
 - (6) Creating a more sustainable centre by encouraging **sustainable forms of transport** such as walking and cycling, incorporating the highest levels of sustainable design in new development and establishing a **decentralised energy** network(s) within the centre;
 - (7) Creating a high quality **accessible and inclusive environment**, especially in the evenings in order to further encourage the development of the night-time economy within the centre;
 - (8) Creating an **attractive and distinctive centre** with high quality design of buildings, public spaces and protecting and enhancing the centres heritage and other important areas;
 - (9) **Diversifying and balancing the centres economy** in order to create additional jobs, increase training opportunities, provide additional office space to support local business and encouraging the development of emerging sectors such as hi-tech, research and development, and creative industries; and
 - (10) Supporting planned growth with the appropriate level of **social infrastructure** to meet the needs of the local community.



2 Methodology

- Sustainability Appraisal (SA) / Strategic Environmental 2.1 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 Walthamstow 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).

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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

<u> </u>	
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 Annex 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 Annex 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.



The SA process 2.2

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

- Assemble the relevant evidence base
- Use evidence to develop the SA framework
- In doing so determine the scope of the SA



Scoping Report

Stage B

- Assess plan options and preferred options / draft policies drawing on Stage A
- Make recommendations to minimise any negative impacts and enhance positive ones
- Propose measures to monitor the significant effects of the preferred approach.

Stage C

Report on SA findings



- Interim SA Report
- Final SA Report

Stage D

Consult stakeholders on the plan options / preferred options alongside SA findings

Stage E

Monitor the implementation of the plan post adoption (including effects predicted by the 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

- 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. Preferred / alternative options have been appraised against the SA Objectives. Plan objectives have also been appraised against the SA Objectives.
- 2.2.5 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 preferred / alternative options

- 2.3.1 The general method adopted when undertaking the appraisal was to compare the likely situation assuming implementation of each preferred / alternative option with the current situation in Waltham Forest (as identified through scoping analysis) for each SA Objective.
- 2.3.2 Where the implementation of the preferred / alternative option 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 preferred / alternative option 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;³
 - 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.

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³ At this stage the policies and site proposals do not provide enough detail in order to assess any differential effects over time; unless otherwise stated. It is assumed that at the Proposed Submission stage further detail will be provided that allows the nature of effects over time to be identified with greater accuracy.



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

++	+	•		?	2
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 preferred / alternative options is presented in greater detail within **Annex I and Annex II**.

Appraisal of the AAP Objectives

2.3.7 **Annex III** 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 Environmental and Sustainability Issues

- 3.1.1 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
 - The southern part of the Borough is subject to higher levels of poor health, which has been associated with deprivation, poverty and overcrowding.

3.2 Relevant SA Objectives

- 3.2.1 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

3.3 Appraisal Findings

- The AAP Strategic Objectives 5 and 6 look to improve sustainable transport options translated through the Movement and Accessibility policies. Improving the quality and frequency of public transport provision and increasing accessibility for pedestrians and cyclists within and to/from the town centre through improved cycle networks will have beneficial health impacts and help to improve air quality within the borough. This will be supported by ensuring all new residential development is 'car free' (WTC10) thus encouraging greater walking and cycling for town centre residents.
- The effect of targeted policies including WTC6 to improve leisure and entertainment provision within the centre should contribute positively to providing a diverse offering of facilities catering for the local and wider community helping improve social cohesion, reduce exclusion and foster sustainable communities.
- Policies WTC11 (High Quality Environment) and WTC12 (Design and Place Making) and WTC15 (Access to Sites of Nature Conservation) also perform well against the health sustainability objectives. These policies reinforce policies to promote walking and cycling and improving the quality of access to green infrastructure within the town centre including ensuring best practice in place making within the public realm should have benefits in terms of health and well being. Improved access to sites of nature conservation (WTC15) and seeking improvements to enhance to these areas will also have positive health benefits.
- Recommendation In Policy WTC13, further detail could be provided on the priority order for social infrastructure.
- Recommendation For the purposes of this assessment it is assumed that a 'healthy pub' refers to one that is children friendly offering food throughout the day. It does not refer to sole drinking establishments and/or wine/cocktail bars. A definition of 'healthy pub' should be provided in the Glossary to ensure a consistent understanding of the use of this term.



- 3.3.1 The approach proposed for the following key sites is expected to further support the achievement of health related objectives:
 - Site 5: EMD Cinema
 - Site 7: Arcade Site
 - Site 8: Town Square and Gardens
 - Site 9: Selbourne Walk Shopping Centre
- Site 13: Buxton Road Bingo Hall
- Site 14: 8 Buxton Road
- Site 15: South Grove
- Site 19: St James Street Health Centre



4 Economy

4.1 Environmental and Sustainability Issues

- 4.1.1 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

4.2 Relevant SA Objectives

- 4.2.1 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

4.3 Appraisal Findings

- The pro-growth approach to the AAP should contribute significantly to improving the
 economic viability of the town centre, strengthen the local economy and improve
 employment opportunities for those that live and work in the area. Increasing the diversity
 of retail offer and supporting an evening economy will increase the attractiveness of the
 centre to both local residents and visitors and help mitigate the impact of competition other
 expanding centres such as Stratford and Ilford.
- The housing policies combined with Walthamstow's relative housing affordability and good transport links should help to attract both young professionals and families to the area. This will help contribute to the local economy and provide a local workforce for newly created jobs.
- An expansion of the retail offering (WTC5) should attract inward investment and deliver a more diverse shopping experience and improve the viability of the town centre. The development of the Leisure Zone and Cultural Café Quarter will also add to the diversity of offering and help market the town as a tourist destination in North London. Considering significant expansion of retail offer at other centres including the Westfield shopping centre in Stratford, Walthamstow could miss out on investment in high end retail due to existing offers being provided in nearby towns.
- The specific policy on employment (WTC7) which promotes a variety of employment options across the service, leisure and business sectors should improve employment opportunities for all qualification levels and reduce the impact of future fluctuations in different sector performance.
- The movement and accessibility policies which focus on improving sustainable transport choices (WTC8, WTC9, WTC10) will increase the attractiveness of the area as a place to live and work and will act positively to improve inward investment to the area. This will be supported by the approach to improve the public realm (WTC11) and implementing a new public space strategy (WTC12).



- **Recommendation** Seek to provide a combination of the preferred policy approach and the alternative approach. While protecting existing employment uses there could also be opportunity to designate specific areas in the AAP to accommodate new office and business uses, including high quality and adaptable office and business floorspace.
- Recommendation Promote the integration of high end retailers within the existing centre
 to maximise diversity and vitality of retail offer while ensuring valued local retail provision is
 supported.

Key site preferred proposals

4.3.1 The approach proposed for all the <u>all</u> key sites is expected to further support the achievement of economy related objectives.



5 Employment and Skills

5.1 Environmental and Sustainability Issues

- 5.1.1 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.

5.2 Relevant SA Objectives

- 5.2.1 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.

5.3 Appraisal Findings

- The AAP policies look to build on and reinforce the existing retail offer, increase its diversity and supplement it through particular measures including the Leisure Zone and Cultural Café Quarter. Policy WTC5 promotes the delivery of a diverse retail offer in the town centre including supporting the existing market. This policy will help maintain existing employment levels and also contribute to new opportunities. Targeted measures under WTC6 to support the develop of the Leisure Zone and Café Quarter will help to bring investment into the centre and increase the number of employment options available.
- Promoting non-retail investment in the town centre primarily through the identified opportunity sites and the support of a Business Improvement District should enable greater work experience and training opportunities to local residents and contribute to reducing unemployment and improving qualification levels. Complementary effects are likely to be a reduction in the overall level of deprivation through improved employment choice.
- Improving the attractiveness of the public realm (WTC12) should increase the attractiveness
 of the centre to inward investment. Furthermore it will also make the centre a more
 attractive place to live and work, and attract young professionals and families to the area.
 Diversifying employment opportunities away from the retail sector to support more services
 sector, SME and start up businesses should help to raise average wage levels.
- **Recommendation** Policies should clearly identify the promotion of high end retailers to provide a stronger policy framework to encourage investment.



Key site preferred proposals

• The approach proposed for all the <u>all</u> key sites is expected to further support the achievement of employment and skills related objectives.



6 Transport

6.1 Environmental and Sustainability Issues

- 6.1.1 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

6.2 Relevant SA Objectives

- 6.2.1 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

6.3 Appraisal Findings

- The movement and accessibility policies WTC8, 9 and 10 all work to support increased walking, cycling and use of public transport and contribute to improving the environmental and sustainability related transport problems identified in Walthamstow.
- Policy WTC8 is likely to deliver significant positive effects and improve opportunities for access to local services, facilities and employment. Improving pedestrian and cycle access between key transport links and creating new walkways to improve connectivity of the centre to surrounding communities will decrease reliance on the private car. Improving the quality and frequency of public transport should also help address an overreliance on the private car an improve greenhouse gas emissions associated with transport.
- Policy WTC9 will help make the centre a more attractive and safer place for pedestrians and cyclists supporting efforts to increase these forms of transport. Designating all new residential development within the centre as 'car free' (WTC10) will add impetus to the need for improved pedestrian and cycle access in Walthamstow Town Centre.
- **Recommendation** provide further details on measures being taken to increase pedestrian and cycle access beyond just the town centre to create links with other existing networks.

- 6.3.1 The approach proposed for the following key sites is expected to further support the achievement of transport related objectives:
 - Site 5: EMD Cinema
 - Site 7: Arcade Site
 - Site 9: Selbourne Walk Shopping Centre
- Site 10: Station Car Park Phase II
- Site 15: South Grove



7 Crime and Safety

7.1 Environmental and Sustainability Issues

- 7.1.1 The following environmental and sustainability problems have been identified:
 - · Crime levels are generally higher in Waltham Forest than nationally

7.2 Relevant SA Objectives

- 7.2.1 The following SA objective is relevant to this sustainability topic
 - Objective 2 Reduce crime and the fear of crime

7.3 Appraisal Findings

• Three of the AAP policies (WTC 1, 6 and 11) were identified as likely to have an effect on reducing crime and the fear of crime. Policies 1 and 6 promote increased development of new housing and leisure, entertainment, culture and tourism both within the town centre and across the Borough more widely. These policies should bring about economic regeneration in the area and help to reduce deprivation locally. Policy WTC11 seeks to improve the town centre's image and public realm with targeted measures to improve the pedestrian environment and other measures to make the centre more attractive and secure.

- 7.3.1 The approach proposed for the following key sites is expected to further support the achievement of crime and safety related objectives:
 - Site 2: Factory, Tower Hamlets Road
 - Site 3: Petrol Station, Hoe Street
 - Site 5: EMD Cinema
 - Site 8: Town Square and Gardens
- Site 13: Buxton Road Bingo Hall
- Site 15: South Grove
- Site 18: St James Street Car Park
- •



8 Housing

8.1 Environmental and Sustainability Issues

- 8.1.1 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

8.2 Relevant SA Objectives

- 8.2.1 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

8.3 Appraisal Findings

- The housing policies WTC1 (Housing Growth) and WTC2 (Housing Density) should in the longer term provide a significant positive contribution to the Borough's housing target and housing need. The targeted approach to housing need with higher density residential located near transport hubs and lower density family homes located further away from the centre should help contribute to providing increased family accommodation; however it is recognized that even though it may be difficult to provide family homes, their provision will still be considered on a site by site basis.
- Policy WTC13 should ensure that housing growth is supported by the appropriate social infrastructure in order to mitigate the effects of increased housing provision on existing services.
- Recommendation More evidence on housing unit mix, need and what is likely to be accommodated in the Town Centre would be of use when considering sustainability implications for housing related objectives.



- 8.3.1 The approach proposed for the following key sites is expected to further support the achievement of housing related objectives:
 - Site 1: Snooker Hall
 - Site 2: Factory, Tower Hamlets Road
 - Site 3: Petrol Station, Hoe Street
 - Site 4: Tax Office
 - Site 5: EMD Cinema
 - Site 6: HSBC Site
 - Site 7: Arcade Site
 - Site 9: Selbourne Walk Shopping Centre
 - Site 10: Station Car Park Phase II

- Site 11: Sainsbury's Site
- Site 12: Osborne Mews
- Site 13: Buxton Road Bingo Hall
- Site 14: 8 Buxton Road
- Site 15: South Grove
- Site 16: Brunner Road Industrial Units
- Site 17: Courtney Place
- Site 18: St James Street Car Park
- Site 19: St James Street Health Centre



9 Air

9.1 Environmental and Sustainability Issues

- 9.1.1 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.

9.2 Relevant SA Objectives

- 9.2.1 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

9.3 Appraisal Findings

- The AAP Policies provide a consistent framework promoting increased provision and accessibility of pedestrian and cycling infrastructure supported by improved public transport provision. Policy WTC8 as discussed in the Transport section is likely to achieve significant positive benefits in improved air quality and reduced greenhouse gas emissions through an integrated sustainable transport system. This policy is supported and augmented by Policy WTC9, in particular promoting improved cycle network in the centre.
- Policy WTC10 stipulates new residential development in the centre to be 'car free'. This will
 help reduce traffic congestion and associated pollution. Supported by improving key road
 junctions to reduce journey times for busses and improve safety for pedestrians and
 cyclists, as well as, requiring cycle parking in new housing development in the centre will
 further contribute to increasing the accessibility of cycling to local residents.
- Specific mention to mitigate the impact of vehicles at opportunity sites (WTCP13) will also contribute to improving air quality on individual site and cumulative to overall improvement in the plan area.
- Seeking to implement a district heating system (Policy WTC14) linked to decentralized energy sources could contribute to reducing greenhouse gas emissions in the borough and support the Mayor of London's aspiration to supply 25% of the capital's energy through decentralized energy by 2025.
- Recommendation There may be a need to investigate the viability of other technology if it
 were found that the cost of implementation of the district heating system are so high that
 they would affect development viability of the centre.
- **Recommendation** Restrictions on private car ownership or opportunities to promote car clubs could be explored to help minimise reliance on private car amongst residents in new housing units. Additionally, the promotion of electric vehicle charge points could be encouraged, particularly in conjunction with opportunity sites that are likely to attract private vehicles (e.g. WTCP 15).



- 9.3.1 The approach proposed for the following key sites is expected to further support the achievement of air related objectives:
 - Site 5: EMD Cinema
 - Site 7: Arcade Site
 - Site 9: Selbourne Walk Shopping Centre
- Site 13: Buxton Road Bingo Hall
- Site 15: South Grove



10 Water

10.1 Environmental and Sustainability Issues

- 10.1.1 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

10.2 Relevant SA Objectives

- 10.2.1 The following SA 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

10.3 Appraisal Findings

- The SA does not suggest that any of AAP Policies will have any implications for water resources or water quality. The Flood Risk Sequential Test (2010) identified that Walthamstow was within flood zone 1 meaning that the centre was at low risk of flooding and there were no land use restrictions in the centre.
- Higher level policy documents including the Waltham Forest LDF Core Strategy and the London Plan provide the policy framework on water efficiency and flood risk to which all development in the AAP should adhere.

Key site preferred proposals

10.3.1 None of the proposed opportunity sites is expected to further support the achievement of water related objectives



11 Biodiversity

11.1 Environmental and Sustainability Issues

- 11.1.1 The following environmental and sustainability problems have been identified:
 - Parts of Epping Forest are in an 'unfavourable' or 'unfavourable/declining' condition

11.2 Relevant SA Objectives

- 11.2.1 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

11.3 Appraisal Findings

- Policy WTC15 Access to Sites of Nature Conservation aims to improve access to nature conservation importance. Walthamstow Town Centre is deficient in access to nature conservation and biodiversity and this Policy aims to open up access to the nearby Walthamstow Wetlands and the wider area of the Lee Valley Regional Park. The Policy does not include any safeguards to maintain or improve the condition of these areas. The Wetlands, designated as a RAMSAR site and Special Protection Area.
- Recommendation In promoting access to areas of nature conservation importance, the
 Policy should clearly specify that any increase in access will not lead to detrimental effects
 and where potential detrimental effects are identified that suitable safeguards and mitigation
 is implemented.
- **Recommendation** Additional detail could be provided within key opportunity site policies on how sites could or should be linked with wider blue and green assets. This would help ensure development proposals maximise improvements sought through WTC 15, particularly in light of the loss of open space resulting from WTPC 7 and 8.

- 11.3.1 The approach proposed for the following site is expected to further support the achievement of biodiversity related objectives:
 - Site 14: 8 Buxton Road



12 Landscape and townscapes

12.1 Environmental and Sustainability Issues

- 12.1.1 The following environmental and sustainability problems have been identified:
 - Development pressure could lead to the loss of open space or recreation facilities

12.2 Relevant SA Objectives

- 12.2.1 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

12.3 Appraisal Findings

- Walthamstow Town Centre benefits from a wealth of historic buildings providing character and a sense of place to the town. The AAP set a pro-growth development framework to improve the town's offering, diversify its offer and attract investment.
- A number of policies including WTC11 and WTC12 seek to promote significant change to improve the town centre's image. WTC11 states the need to respect the existing character and context while WTC12 aims to significantly raise the quality of architectural and urban design that positively responds to its context including being sympathetic in scale to existing 2-3 storey buildings. These policies should ensure that development is appropriate to and complements the existing townscape. Application of these policies in the delivery of the opportunity sites should ensure that prominent building of architectural merit, including the Former Factory Tower Hamlets Road (WTCP2) and EMD Cinema (WTCP5), which is Grade II listed, should ensure their original character and value they add to the townscape is retained.
- Opening up access to nature conservation (WTC15) could improve the sense of setting of town centre by making access to open space easily accessible.
- Recommendation For Policy WTC12 (Design and place making) it is suggested that the
 preferred approach is modified so that it incorporates elements of the alternative approach.
 Such an approach would involve improving and protecting local character and context as
 well as looking to create in appropriate areas a 'new character' to better capitalise on the
 place making strategy.



- 12.3.1 The approach proposed for the following key sites is expected to further support the achievement of landscape and townscape related objectives:
 - Site 1: Snooker Hall
 - Site 2: Factory, Tower Hamlets Road
 - Site 3: Petrol Station, Hoe Street
 - Site 4: Tax Office
 - Site 5: EMD Cinema
 - Site 6: HSBC Site
 - Site 7: Arcade Site
 - Site 8: Town Square and Gardens
 - Site 9: Selbourne Walk Shopping Centre

- Site 10: Station Car Park Phase II
- Site 11: Sainsbury's Site
- Site 13: Buxton Road Bingo Hall
- Site 14: 8 Buxton Road
- Site 15: South Grove
- Site 16: Brunner Road Industrial Units
- Site 17: Courtney Place
- Site 18: St James Street Car Park
- Site 19: St James Street Health Centre



13 Waste

13.1 Environmental and Sustainability Issues

- 13.1.1 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.

13.2 Relevant SA Objectives

- 13.2.1 The following SA objective is relevant to this sustainability topic:
 - Objective 9 Reduce production of waste and increase recycling

13.3 Appraisal Findings

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.

Key site preferred proposals

13.3.1 None of the proposed opportunity sites are expected to further support the achievement of waste related objectives. Site 9: Selbourne Walk Shopping Centre is likely to result in an increase in waste due to the proposed expansion of retail offer.



Annex I – Appraisal of Preferred Options / Alternatives

Housing growth options				
		red policach: WT	Alt Option 1:	
SA Objective		,000 new o opportuit ousing as use scher velopmen g above s oors.	Up to 1,000 homes. No promotion of housing above shops.	
	S	M	L	
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	+	+	+	+
Improve standard of health and wellbeing of those who live and work in the Borough	~	~	~	~
Increase the provision of and access to community facilities to meet local cultural, recreational and social needs	+	+	+	+
5. Improve educational attainment in schools	~	~	~	~
Improve opportunities for access to education and training for all residents	~	~	~	~
7. Reduce the overall level of deprivation	~	~	~	~
Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system	~	~	~	~
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	~	~	~	~
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	~	~	~	?



Housing growth options				
Make the best use of previously developed land (PDL) and existing buildings	~	~	٧	~
17. Conserve and enhance biodiversity	~	~	2	~
18. Protect the ecological integrity of Natura 2000 sites	~	~	2	~
19. Maintain and enhance the quality of the green belt and open space areas.	~	~	٧	~
20. Conserve and, where appropriate, enhance the historic environment	~	~	٧	~
21. Maintain and enhance the vitality and viability of the Borough's town centres	+	+	++	+
22. Improve the local economy by attracting inward investment	~	~	7	~
23. Maintain stable levels of employment in the Borough	~	~	2	2

Summary

Preferred policy approach:

In the long term, the preferred policy approach should provide a significant positive contribution to the Borough's housing target and housing need (even though it may be difficult to provide family homes, these will still be considered on a site by site basis) and enhance the vitality and viability of the Town Centre.

Providing new housing in Walthamstow Town Centre is also likely to contribute positively to reducing crime and the fear of crime and increasing access to community facilities.

Alternative Option 1:

This option is likely to contribute positively to SA Objectives 1, 2, 4 and 21 like the preferred policy approach. Significant positive effects are unlikely to be seen with this option due to the lower growth scenario in comparison to the preferred policy approach including not promoting housing above shops.

Recommendations

No recommendations proposed.



Но	using density options					
			ed polic		Alt option 1:	Alt option 2:
	SA Objective	700 hrha surround central & stations; densities density i and nea and Wal	s betweer a; higher carriage Walth & St Jame and lower s near oth residential r Leuchal thamstow	lensities namstow s Street r er low areas Road St	Densities over 700 hrha in the town centre.	Build housing at lower densities up to 500 hrha.
		S	М	L		
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	~	~	~	~	~



Housing density options					
14. Reduce the risk of flooding	~	~	~	~	~
Reduce contamination and safeguard soil quality and quantity	~	~	~	~	~
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

Preferred policy approach:

The preferred policy approach shows positive effects for making the most effective and efficient use of land and buildings at densities between 200 and 700 hrha. 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 in suitable locations. Aiming to ensure that new housing schemes propose densities appropriate to the character and context of Walthamstow is also likely to have positive effects on the historic environment.

Allowing for building at higher densities in a highly accessible location (PTAL score 6a) is likely to reduce the need for a private car with positive benefits for improving air quality through a reduction in traffic-based emissions.

Alternative Option 1:

This option is likely to have significant positive effects for making the most effective and efficient use of land and buildings at densities over 700 hrha in the centre. Uncertain impacts on the historic environment are shown as the impact on this objective will depend on implementation at the project level. It could be the case that high density development increases the chances that historic character is lost. It is possible that impacts can be avoided through the careful integration of heritage features.

Building at higher densities in a highly accessible location (PTAL score 6a) is likely to reduce the need for a private car with positive benefits for improving air quality through a reduction in traffic-based emissions.

Alternative Option 2:

Building housing at lower densities up to 500 hrha, is in accordance with the Core Strategy (Policy CS2)



Housing density options

and the draft replacement London Plan density matrix, however as Walthamstow is a location where higher housing densities are considered to be acceptable, to build up to a density of 500 hrha where it would be possible to build at higher densities would not make the best use of previously developed land. An uncertain impact on SA Objective 12 is shown as the impact on this objective will depend on implementation at the project level.

Recommendations

No recommendations proposed.

Affordable housing options							
		ed policy ch: WTC		Alt option 1:	Alt option 2: Allow a higher		
SA Objective	housing centre; a by-site by viability; reduces shortfall an off sit and tenu social reintermed	e affordab (AH) in th at least 50 pasis) subj where via AH below to be mad the paymer ure split of inted and diate, parti pwnership	e % (site- ect to bility 150% - de up by at in lieu; 60% 40% cularly	AH on site reduced to below 50%.	proportion of intermediate housing in the centre.		
	S	М	L				
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	~	~	~	~	~		
Improve standard of health and wellbeing of those who live and work in the Borough	~	~	~	~	~		
Increase the provision of and access to community facilities to meet local cultural, recreational and social needs	~	~	~	~	~		
5. Improve educational attainment in schools	~	~	~	~	~		
Improve opportunities for access to education and training for all residents	~	~	~	~	~		
7. Reduce the overall level of deprivation	~	~	~	~	~		
Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system	~	~	~	~	~		



Affordable housing options					
Reduce production of waste and increase recycling	~	~	~	~	~
10. Reduce greenhouse gas emissions	~	~	~	~	~
11. Conserve energy	~	~	~	~	~
Improve air quality through a reduction in traffic-based emissions	~	~	~	~	~
Improve water quality and ensure the efficient use of water resources	~	~	~	~	~
14. Reduce the risk of flooding	~	~	~	~	~
Reduce contamination and safeguard soil quality and quantity	~	~	~	~	~
Make the best use of previously developed land (PDL) and existing buildings	~	~	~	~	~
17. Conserve and enhance biodiversity	~	~	~	~	~
Protect the ecological integrity of Natura 2000 sites	~	~	~	~	~
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	~	~	~	~	~
Improve the local economy by attracting inward investment	~	~	~	~	~
23. Maintain stable levels of employment in the Borough	~	~	~	~	~

Summary

Preferred policy approach:

The approach contributes to meeting local housing needs by maximising affordable housing in the centre by specifying 50% affordable housing on site (subject to viability on a site by site basis), requiring any shortfall to make a an off site payment in lieu and providing a tenure split of 60% Social Rented and 40% intermediate housing. In the short term it may be difficult to meet the affordable housing target due to viability.

Alternative Option 1:

Reducing the level of affordable housing sought on site to below 50% in order to improve development



Affordable housing options

viability is incompatible with the Borough wide affordable housing target and is unlikely to contribute to addressing a significant level of affordable housing need in Walthamstow.

Alternative Option 2:

This option is likely to have a positive impact on meeting local housing needs by allowing a higher proportion of intermediate housing in the centre to increase home ownership opportunities for people who cannot afford to buy a home outright as the Borough contains a high proportion of rented homes.

Recommendations

No recommendations proposed.

Unit mix options									
			ed policy		Alt option 1:	Alt option 2:			
	SA Objective		approach: WTC4 Negotiate unit mix on a site by site basis (focus on family housing on sites close to west of the centre close to St James Street station); and where family housing is provided, locate on the ground floor where it has access to private usable amenity space.		Housing mix of 10% 1 bed, 40% 2 bed, 40% 3 bed & 10% one bed for market housing and 10% 1 bed, 30% 2 bed, 50% 3 bed & 10% 4 bed for	Seek a higher proportion of family homes (three bed plus) across all tenures.			
		S	М	L	affordable tenures in accordance with emerging Development Management Polices.				
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	~	~	~	~	~			



ماا	it mix options					
UII	it mix 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	~	~	~	~	~
CII	mmarv	•	•			-

Preferred policy approach:

Unit mix will be decided on a site by site basis. The impact of this approach on meeting local housing needs is uncertain as unit mix will be negotiated according to each site instead of contributing toward meeting a particular target. Further details on this would provide more certainty. Focusing family housing



Unit mix options

in particular areas and locating it on the ground floor to allow for private usable amenity space contributes to maintaining and enhancing the quality of open space areas and would contribute to improving health and wellbeing.

Alternative Option 1:

Housing mix in accordance with emerging Development Management Polices would assist with meeting housing mix needs Borough wide through setting proportions for market and affordable housing. However this may not be appropriate for the AAP area. Further details on this would provide more certainty.

Alternative Option 2:

Seeking a higher proportion of family homes across all tenures would prioritise one housing need over others. Uncertain whether the Town Centre is the appropriate area in the Borough to prioritise family homes above others as this will also be dependent on sites and viability.

Recommendations

More evidence on unit mix, need and what is likely to be accommodated in the Town Centre would be useful in considering the sustainability of all options and to provide more certainty of impacts.

Retail options							
	Preferred policy approach: WTC5				Alt Option 1:		
	SA Objective	Develop oppretail uses; in mixed use development designated pretail frontag diversify over of uses within support and development and ensure reclustering of betting shop licences.	Extend the town centre boundary to incorporate additional sites which could provide retail uses.				
		S	М	L			
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	~	~	~	~		



Re	tail options				
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	+	+	+	+
		•	•	•	

Preferred policy approach:
Walthamstow Town Centre benefits from an ethically and culturally diverse community supported by a high



Retail options

proportion of independent retailers and a renowned street market. Upgrading and diversifying the existing retail offering and targeted development of opportunity sites should help support and consolidate the town centre's vitality while providing a catalyst for attracting inward investment. The extent to which site extensions would affect the quality of open space is unclear and would depend on site specific design; however, increased retail floorspace and the development of the market should provide improved employment opportunities.

Alternative Option 1:

Extension of the town centre boundary has the potential to 'dilute' the existing diverse and independent retail offering by drawing investment to new areas away from the existing town centre. However, additional sites for retail use, particularly if of sufficient size to support 'high end' retailers could provide opportunities to a wider variety of retailers and help support greater inward investment. As for the preferred policy approach increased retail sites would help to improve employment opportunities but may have impacts on existing amenity spaces.

Recommendations

Promote the integration of high end retailers within the existing centre to maximise diversity and vitality of retail offer while ensuring valued local retail provision is supported.

Но	Hot food takeaways, estate agents, betting shops and off licences options						
		Preferred WTCX	Alt Option 1:				
	SA Objective		Resist the development of any additional Hot Food Takeaway, Estate Agent, Betting Shop or Off Licence and seek to reduce numbers which already exist within the centre.				
		s	М	L	secondary shopping frontage.		
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,	~	~	~	~		



Hot food takeaways, estate agents, betting shops and	d off licence	s options		
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	~	~	~	~
Improve air quality through a reduction in traffic- based emissions	~	~	~	~
Improve water quality and ensure the efficient use of water resources	~	~	~	~
14. Reduce the risk of flooding	~	~	~	~
Reduce contamination and safeguard soil quality and quantity	~	~	~	~
Make the best use of previously developed land (PDL) and existing buildings	~	~	~	~
17. Conserve and enhance biodiversity	~	~	~	~
18. Protect the ecological integrity of Natura 2000 sites	~	~	~	~
19. Maintain and enhance the quality of the green belt and open space areas	~	~	~	~
20. Conserve and, where appropriate, enhance the historic environment	~	~	~	~
21. Maintain and enhance the vitality and viability of the Borough's town centres	+	+	+	-
22. Improve the local economy by attracting inward investment	+	+	+	-
23. Maintain stable levels of employment in the Borough	~	~	~	~
Summary	1	1	1	

Preferred policy approach:

Hot food takeaways and betting shops etc. are over concentrated in the town centre. Resisting additional development and seeking to reduce the existing offer would free up retail space for other businesses providing the opportunity to enhance and not undermine the vitality and viability of the centre.

Alternative Option 1:

Breaking up the clustering of existing hot food takeaways and betting shops would aesthetically improve the visual appearance of the high street. However, relocating these businesses to another part of the high street does not reduce their overconcentration within the town centre as a whole nor provide the



Hot food takeaways, estate agents, betting shops and off licences options

opportunity for other businesses to enter the high street in their place.

Recommendations

No recommendations proposed.

Pu	Pubs options						
		Preferred WTCX	Preferred policy approach: WTCX				
	SA Objective	Resist the lo within the ce healthy pubs		Not protect or promote healthy pubs			
		S	M	L	within the centre.		
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	~	~	~	~		



Pubs options				
15. Reduce contamination and safeguard soil quality and quantity	~	~	2	~
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	+	+	+	?

Preferred policy approach:

Pubs are part of an area's local heritage and provide a valuable community service as a place to meet and socialise. They provide employment and help support the evening economy. Many public houses have resisted significant external refurbishment and are representative of an area's historic character. Resisting the loss of existing pubs will help preserve the areas historic environment and help maintain stable employment in this sector. The promotion of healthy pubs will enhance the evening economy and provide opportunities for new establishments helping maintain the vitality of the town centre and draw in new investment. New pubs would also provide a variety of new employment opportunities.

Alternative Option 1:

This option is appraised on the assumption that it aims to resist the loss of existing pubs but will not actively protect or promote healthy pubs. Given the picture nationally that pubs are closing at an increasing rate, there may be little the Council can do to resist further loss of existing pubs without active intervention. It is possible that existing pubs will close and be converted to other use. This would impact on the local historic environment of the town centre and could undermine the vitality and viability of the town centre, in particular impacting the evening economy. The extent to which employment opportunities would be impacted is unclear and would depend on the nature of any change of use of the premises.

Recommendations

For the purposes of this assessment it is assumed that a 'healthy pub' refers to one that is children friendly offering food throughout the day. It does not refer to sole drinking establishments and/or wine/cocktail bars. A definition of 'healthy pub' should be provided in the Glossary to ensure a consistent understanding of the use of this term.

Alternative option 1 should clearly state that it also, as per the preferred policy approach, aims to resist the loss of existing pubs.



Leisure, entertainment, culture and tourism options								
			ed policy		Alt option 1:	Alt option 2:		
	SA Objective	approach: WTC6 Developing opportunity sites for new leisure, entertainment, cultural and leisure uses; support the development of a 'Leisure Zone and Entertainment' (eastern end of the High Street); support the creation of a 'Cultural Café Quarter' (western end of the High Street); and facilitate and support the growth of the evening economy, with particular focus in the 'Leisure and Entertainment Zone' and 'Cultural Café Quarter'.			Developing opportunity sites for new leisure, entertainment, cultural and leisure uses; support the development of a 'Leisure Zone and Entertainment' (eastern end of the High Street); support the creation of a 'Cultural Café Quarter' (western end of the High Street); and facilitate and support the growth of the evening economy, with particular focus in the 'Leisure and Entertainment Zone' and 'Cultural Café Quarter'.		Not to develop any leisure or cultural uses within the centre.	Not to seek to develop the evening economy within the centre.
		S	М	L				
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	~	~	~	~	~		



Leisure, entertainment, culture and tourism options							
Improve air quality through a reduction in traffic-based emissions	~	~	~	~	~		
Improve water quality and ensure the efficient use of water resources	~	~	~	~	~		
14. Reduce the risk of flooding	~	~	~	~	~		
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	~	~	٧	~	~		
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	+	+	+	-	-		

Preferred policy approach:

The development of opportunity sites and identified areas for leisure and entertainment with the focus on supporting the growth of the evening economy should result in increased footfall at this time and reduced crime and fear of crime. This policy should result in improved entertainment, leisure and cultural uses in the town centre and help meet the requirement of objective 4. Development of the leisure zone and cultural quarter should enhance the viability of the town centre by increasing the attraction of the town as a tourist destination. This strong development policy should provide confidence to help attract inward investment helping support and enhance employment opportunities in the Borough.

Alternative Option 1:

The town centre lacks non-retail uses such as leisure, tourism and cultural facilities despite its proximity to a large local population and good transport links. This option will not improve this situation and fail to address local need. The policy would potentially result in a missed opportunity to be gained from the influx of tourists as part of the Olympics events and legacy experience. The existing poor evening economy contributes to a deserted high street in the evening where people can feel unsafe and a lack of investment in creating an evening economy would not help address this issue. The lack of a strong policy promoting development would fail to attract inward investment and provide the means to enhance the vitality and



Leisure, entertainment, culture and tourism options

viability of the town centre. Consequently it could have a negative impact on employment opportunities whereby businesses choose to locate to other centres such as Stratford, Ilford and Enfield leading to a general decline in the Walthamstow as people travel to other areas for leisure and retail services.

Alternative Option 2:

The town centre has a limited evening economy which contributes to a centre that feels 'dead' and unsafe in the evening. Failing to address this will not reduce crime and the fear of crime. Furthermore, it would result in a missed opportunity to diversify the local economy and provide incentives for new investment with consequential impacts on local employment.

Recommendations

No recommendations proposed.

Em	ployment options					
Ξ		Preferred policy approach:				
	SA Objective	Protect existing employment uses within the centre; further diversify range of employment generating uses within the centre; develop opportunity sites for new office space; encourage the development of creative and cultural industries; and support the development of a Business Improvements District.			Seek to significantly change the role and function of the centre and make it a location for office and business use. Seek to provide a significant increase in the	
		S	М	L	amount of high quality and adaptable office and business floorspace within the centre.	
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	~	~	~	~	



Employment options				
8. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system	~	~	~	~
Reduce production of waste and increase recycling	~	~	~	~
10. Reduce greenhouse gas emissions	~	~	~	~
11. Conserve energy	~	~	~	~
Improve air quality through a reduction in traffic-based emissions	~	~	~	~
Improve water quality and ensure the efficient use of water resources	~	~	~	~
14. Reduce the risk of flooding	~	~	~	~
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	+	+	+	?
Cummory				

Preferred policy approach:

Walthamstow provides a unique retail offer. Its ethnically and culturally diverse local population and variety of independent retailers and historic market provide a different experience to other town centres. However, the centre has been underperforming for a number of years and if not reversed is likely to suffer from further decline as it loses out to other centres which are diversifying and expanding. The preferred policy



Employment options

approach should help halt this decline. Development of the distinct leisure zone and café quarter will appeal to a wider audience and draw in additional visitors. The opportunity sites will help support this offering and also provide additional office and work space to support the business sector. This policy presents a balanced and flexible framework to deliver a diverse and attractive town centre and would contribute the successful regeneration of the centre. The support of a Business Improvement District would further add value to this policy approach.

Alternative Option 1:

Walthamstow is a large and established retail centre with a relatively small knowledge economy, having missed out, in part to west London, in the growth of these industries during the 1980s and 1990s. Notwithstanding, the centre is served by excellent transport links and presents a good location for new business and office space. Increasing such uses would help diversify and provide greater balance to the local economy. The proposal to significantly change the role and function of the centre to a location for office and business use would likely attract inward investment; however it would also ultimately lead to an over concentration of such uses and a lack of diversification for the local economy. It is not clear whether a change of role and function to office and business use would result in a mismatch between local people's skills and business need. Furthermore, reducing the available of business premises to support an evening economy could lead to increased crime and fear of crime.

Recommendations

Seek to provide a combination of the preferred policy approach and the alternative approach. While protecting existing employment uses there could also be opportunity to designate specific areas in the AAP to accommodate new office and business uses, including high quality and adaptable office and business floorspace.

Transport improvements options				
	Preferred	policy appro	pach: WTC8	Alt Option 1:
SA Objective	providers to capacity on transport si layout of th Street; imprat a) High S Street/ Selbo Central exit/ and d) Palmestablish a between key Walthamsto Walthamsto walkway(s) to Chingford links; impraround the development contribution	existing bus ystems; simple gyratory sy ove pedestrictreet/Hoe Stre orne Road c) 'Seborne Road/ erston Road/le pedestrian a y transport into w Queens Road w Central; cre under the Live	s is sufficient and rail olify the restem on Hoe an crossings et, b) Hoe Walthamstow d/Bus Station High Street; and cycle link erchanges at ad and rate a new erpool Street e north/south ng in and equiring new financial ojects that	Other than a 'do nothing' approach, it is considered that there are no alternative options for this policy as the proposals in it are essential to the enhancement and regeneration of the centre.
	S	M	L	
Meet local housing needs through the provision of a range of tenures and sizes of	~	~	~	~



Tra	Insport improvements options				
	new dwellings				
	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	2	2	?	~
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	~	2	2	~
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	~	2	?	~
10.	Reduce greenhouse gas emissions	+	+	+	-
11.	Conserve energy	~	2	?	~
12.	Improve air quality through a reduction in traffic-based emissions	+	+	+	-
13.	Improve water quality and ensure the efficient use of water resources	~	2	~	~
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.	~	~	~	~



Transport improvements options						
20. Conserve and, where appropriate, enhance the historic environment	~	2	٧	~		
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	~	~	~	~		

Preferred policy approach:

In the medium to long term, the preferred policy approach is likely to achieve significant positive effects to improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system working with transport providers and improving access in order to facilitate and promote other forms of sustainable transport. Positive impacts are shown for objectives that look to increase access for those that live and work in the Borough, reduce greenhouse gas emissions, improve air quality through a reduction in traffic-based emissions and maintain and enhance the vitality and viability of the Borough's town centres.

Alternative Option 1:

The appraisal has shown that a 'do nothing' approach would significantly lead away from developing a integrated sustainable transport system. Negative impacts are shown for objectives that look to increase access for those that live and work in the Borough, reduce greenhouse gas emissions, improve air quality through a reduction in traffic-based emissions and maintain and enhance the vitality and viability of the Borough's town centres.

Recommendations

Provide further details on measures being take to increase pedestrian and cycle access beyond just the town centre to create links with other existing networks

Sustainable transport options							
SA Objective	WTC9 Support a rapromote and environmen	ange of improd enhance the tor pedestrict improve the he centre.	Alt Option 1: Prioritise initiatives which upgrade and improve the existing road network and promote the use of the private car as				
	s	М	L	the main form of transport to access the centre.			
Meet local housing needs through the provision of a range of tenures and sizes or new dwellings		~	~	~			
2. Reduce crime and the fear of crime	~	~	~	~			



	1-2-1-1				
Sus	stainable transport options			ı	
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	~	~	~	~



Sustainable transport options						
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	~	~	~	~		

Preferred policy approach:

Supporting other forms of sustainable transport to make the centre more attractive and safe for pedestrians and cyclists and improve networks has benefits for health, access, integrating sustainable transport and reducing greenhouse gas emissions.

Alternative Option 1:

Evidence reveals that the centre can become heavily congested with traffic at particular times, causing significant delays. Prioritising initiatives which upgrade and improve the existing road network and promote the use of the private car as the main form of transport to access the centre does not equate with sustainability principles or addressing traffic congestion issues.

Recommendations

None

Ca	Car and cycle parking options							
		Preferred p	olicy approa	ch: WTC10	Alt option 1:	Alt option 2:		
	SA Objective	Ensure that all new residential development within the centre is 'ca free' incorporating the appropriate le of cycle parking; and ensure that all retail, leisure, community and cultura uses provide appropriate levels of cand cycle parking.			Provide additional car parking within the town centre for car borne visitors to	Allow an element of car parking in residential development.		
		S	М	L	the centre.			
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	+	+	+	~	~		



Ca	r and cycle parking options					
	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	~	~	~	~	~



Car and cycle parking options						
21. Maintain and enhance the vitality and viability of the Borough's town centres	+	+	+	?	~	
22. Improve the local economy by attracting inward investment	2	2	~	2	~	
23. Maintain stable levels of employment in the Borough	~	~	~	~	~	

Preferred policy approach:

The approach performs well from a sustainability perspective. Ensuring that all new residential development within the centre is 'car free, incorporates an appropriate level of cycle parking and all new retail, leisure, community and cultural uses provide appropriate levels of car and cycle parking has benefits for health, access and access to an integrated a sustainable transport system, reducing greenhouse gas emissions, improving air quality through a reduction in traffic-based emissions, and enhancing the town centre.

Alternative Option 1:

This option would have negative impacts on accessing an integrated sustainable transport system, reducing greenhouse gas emissions and improving air quality through a reduction in traffic-based emissions. Evidence suggests that it is considered unnecessary to provide additional car parking for car borne visitors to the centre and options to increase the level of car parking were rejected. As surveys revealed that the various car parks within the centre are under utilised and are only close to capacity at peak time during the weekend.

Alternative Option 2:

The sustainability impacts of this option will depend on the specifics of how much car parking would be allowed or accommodated in residential development e.g. only for disabled residents, where the residential development is located, will any thresholds be applied e.g. one car per household, and extent of 'car free' development.

Recommendations

None



Hiç	High quality environment options						
			policy app	roach:	Alt Option 1:		
	SA Objective	public realm pedestrian of Street Life Snew shop for James Street as an 'Area Improvemer pedestrian eincluding Wi'Legible Lon protecting a heritage of tunnecessar street clutter enhancing a of green spacentre; proventre (partideficiency); improvemer make the cesecure; and developmer contributions enhance the	town centre town centre t; the market sirculation; age strategy' prince onts on Hoe, ets; designate of Public Ren et; improving environment althamstow a don' wayfind he centre; re y obstacles, r within the pa aces through iding play face cularly in are incorporating ints to the public entre more ac requiring ne to to provide to s towards pro e existing public	Other than a 'do nothing' approach, it is considered that there are no alternative options for this policy as the proposals in it are essential to the enhancement and regeneration of the centre.			
		S	М	L			
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	~	~	~	~		



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Preferred policy approach:

The preferred policy approach performs well from a sustainability perspective. This policy seeks to promote significant changes to improve the town centre's image and public realm incorporating enhancement, appearance and function improvements. At the same time, this policy also seeks to ensure that change occurs in such a way that respects existing local character and context. The approach has shown benefits for reducing crime, health and wellbeing, access to community facilities, open spaces, historic environment, vitality and viability of the town centre and attracting inward investment.



High quality environment options

Alternative Option 1:

The appraisal has shown that a 'do nothing' approach would lead to negative impacts against a number of sustainability objectives. This alternative is not conducive to the enhancement and regeneration of the centre or improving its poor image.

Recommendations

None

Design a	and place making options				
			policy app	roach:	Alt Option 1:
SAC	Objective	principles as considering improvemer creating, improvement a cycle route improving to into the centimprovement the quality urban design framework for new develop sympathetic predominal whilst focus key "gatew restoration improveme of character range of opt town squar public spacincorporating frontages" development of the consideration improvement of character range of opt town squar public spacincorporating frontages development of the consideration improvement of character range of opt town squar public spacincorporating frontages development of the consideration improvement of the consideration in the conside	c in scale to nt 2-3 storey sing taller b ay" sites; er and ongoin nt of existin r within the ions for imp e and garde e strategy; g "active bu	To creating a new character and context for the centre by creating land mark buildings, encouraging distinctive and contemporary design and establishing new building forms and character areas.	
		S	M	L	
provi	local housing needs through the sion of a range of tenures and sizes of dwellings	~	~	~	~
2. Redu	uce crime and the fear of crime	~	~	~	~
	ove standard of health and wellbeing of e who live and work in the Borough	+	+	+	?
4. Incre	ease the provision of and access to	+	+	+	?



Design a	nd place making options				
	nunity facilities to meet local cultural, ational and social needs				
5. Impro	ve educational attainment in schools	~	~	~	~
6. Impro	ove opportunities for access to ation and training for all residents	~	~	~	~
7. Redu	ce the overall level of deprivation	~	~	~	~
servio	ove opportunities for access to local ces, facilities and employment through egrated sustainable transport system	~	~	~	~
9. Redu recyc	ce production of waste and increase ling	~	~	~	~
10. Redu	ce greenhouse gas emissions	~	~	~	~
11. Cons	erve energy	~	~	~	~
	ve air quality through a reduction in -based emissions	~	~	~	~
13. Impro	eve water quality and ensure the ent use of water resources	~	~	~	~
14. Redu	ce the risk of flooding	~	~	~	~
	ce contamination and safeguard soil y and quantity	~	~	~	~
	the best use of previously developed PDL) and existing buildings	~	~	~	~
17. Cons	erve and enhance biodiversity	~	~	~	~
18. Prote 2000	ct the ecological integrity of Natura sites	~	~	~	~
	ain and enhance the quality of the belt and open space areas.	+	+	+	?
	erve and, where appropriate, enhance storic environment	+	+	+	?
	ain and enhance the vitality and viability Borough's town centres	+	+	+	?
22. Impro	ve the local economy by attracting	+	+	+	?



Design and place making options										
inward investment										
23. Maintain stable levels of employment in the Borough	~	~	~	~						

Preferred policy approach:

The preferred policy approach performs well from a sustainability perspective. This policy seeks to follow "place-making" principles as a framework when considering new development and improvements within the centre. The approach has shown benefits for health and wellbeing, access to community facilities, open spaces, historic environment, vitality and viability of the town centre and attracting inward investment.

Alternative Option 1:

Greater detail would be required to appraise the sustainability of for this alternative option. Creating a 'new character' for Walthamstow may make it possible to better capitalise on an overall design and place making strategy particularly for Walthamstow. 'Creating a new character' may also help to address some existing local problems. For example, the town gardens are underused and don't function well. Improving the town gardens holistically as part of a 'new character' with other open space and/or public realm areas could be more effective. However, a 'new character' and context would also need to seek to ensure that any change occurs in such a way that respects existing local character and context to be preserved.

Recommendations

Seek to provide a combination of the preferred policy approach and Alternative Option 1. Such an approach would involve improving and protecting local character and context as well as looking to create in appropriate areas a 'new character' to better capitalise on the place making strategy.

Social infrastructure options				
SA Objective	Provision of sites with a residential upermission of social infras mixed-use of Opportunity accessible leactive groun provided; co sought throut o support the social infras or improvem to meet the and whereves should be a	nent of existing needs of the	n mixed use of t planning ty uses and part of on the er ere an t frontage is will be obligations of new the expansioning facilities community; new facilities to be	Alt Option 1: To prioritise the delivery the most important forms of social infrastructure health and education.
Meet local housing needs through the provision of a range of tenures and sizes of	~	~	~	~



So	cial infrastructure options				
	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	~	2	~	~
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.	~	~	~	~



Social infrastructure options										
20. Conserve and, where appropriate, enhance the historic environment	~	2	~	2						
21. Maintain and enhance the vitality and viability of the Borough's town centres	~	2	~	2						
22. Improve the local economy by attracting inward investment	~	~	~	~						
23. Maintain stable levels of employment in the Borough	~	~	~	~						

Preferred policy approach:

The preferred policy approach performs well from a sustainability perspective. The policy looks to ensure that housing growth is supported by the appropriate social infrastructure. The approach has shown benefits for health, access to community facilities, access to education and training, and making the best use of PDL (through encouraging provision of amenities on mixed use sites with a high density of residential use).

Alternative Option 1:

While the preferred policy approach looks to provide social infrastructure to support housing growth, this alternative option seeks to prioritise in particular health and education infrastructure. Even though this alternative option also performs well against sustainability objectives, the options in this instance are not able to be directly compared due to their difference in emphasis.

Recommendations

Further detail could be provided on the priority order for social infrastructure.

Decentralised energy options				
SA Objective	WTC14 To facilitate heating syst with energy development contribute to system; conbuildings an properties to provide suffirequiring all to the system requiring all comes forware stablished	a CHP and of the memory and the area of the network of the network of the area	district to the centre a to lishing the ic sector ed Council a in order to loads; oment to link viability; t which e system is ction ready';	Alt Option 1: Not to facilitate and promote CHP and district heating system in the centre.
	.	141	_	
Meet local housing needs through the provision of a range of tenures and sizes of	~	~	~	~



Dec	centralised energy options				
	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	~	2	~	~
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.	~	~	~	~



Decentralised energy options										
20. Conserve and, where appropriate, enhance the historic environment	~	2	~	~						
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	~	~	~	~						

Preferred policy approach:

The preferred policy approach performs well from a sustainability perspective. The approach has shown benefits in the short to medium term and significant positive effects in the long term for reducing green house gases and conserving energy. The policy aims to facilitate a CHP and district heating system to supply the centre with energy, requiring contributions from development, getting public sector buildings connected to the network, requiring all new development to link to the system, subject to viability, getting all development which comes forward before the system is established to be 'connection ready' and safeguarding routes for pipelines.

Alternative Option 1:

Not to facilitate and promote CHP and district heating system in the centre would lead to significant negative and negative impacts against objectives seeking to reduce green house gases and conserve energy. This alternative is not conducive to reducing significant heat demand that exists at a number of sites/buildings within the centre as well as the borough wide Heat Mapping Study (2011) indicated that there is an opportunity in Walthamstow to establish a decentralised energy network. It is acknowledged though that the cost of implementing a district heating system are high, however seeking contributions from development may assist with mitigating this.

Recommendations

There may be a need to investigate the viability of other technology if it were found that the cost of implementation of the district heating system are so high that they would affect development viability of the centre.

Access to sites of nature conservations option	S			
	Preferred WTC15	policy app	Alt Option 1: Not to link the town	
SA Objective	conservation creating, im links to sites importance; contribution enhance linl	access to sit in importance proving and of s of nature co and seeking s to create, in ks to sites of in importance	by: enhancing enservation developer enprove and nature	centre with areas of nature conservation importance which are located nearby.
	S	М	L	
Meet local housing needs through the provision of a range of tenures and sizes of	~	~	~	~



Ace	cess to sites of nature conservations options	6			
	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.	+	+	+	-



Access to sites of nature conservations options										
20. Conserve and, where appropriate, enhance the historic environment	~	2	~	~						
21. Maintain and enhance the vitality and viability of the Borough's town centres	~	2	~	~						
22. Improve the local economy by attracting inward investment	~	~	~	~						
23. Maintain stable levels of employment in the Borough	~	~	~	~						

Preferred policy approach:

The preferred policy approach performs well from a sustainability perspective. The policy looks to improve access to sites of nature conservation importance as the centre is deficient in access to nature conservation and biodiversity. The approach has shown benefits for health, access to recreational needs, conserving and enhancing biodiversity, and maintaining and enhancing the quality of open space areas.

Alternative Option 1:

To not provide a link the town centre with areas of nature conservation importance which are located nearby does not look to addressing deficiency in access to nature conservation and biodiversity or look to meet sustainability objectives.

Recommendation

In promoting access to areas of nature conservation importance, the Policy should clearly specify that any increase in access will not lead to detrimental effects and where potential detrimental effects are identified that suitable safeguards and mitigation is implemented.



Annex II – Appraisal of Key Site Preferred Proposals

	SA Objective	WTCP 1	WTCP 2	WTCP 3	WTCP 4	WTCP 5	WTCP 6	WTCP 7	WTCP 8	WTCP 9	WTCP 10	WTCP 11	WTCP 12	WTCP 13	WTCP 14	WTCP 15	WTCP 16	WTCP 17	WTCP 18	WTCP 19
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	~	~	~	~	~	~	~	2	~	~	~	~	~	+	2	~	~	2	~
6.	Improve opportunities for access to education and training for all residents	~	~	~	~	~	~	~	~	~	~	~	~	~	++	2	~	~	~	~



London Borough of Waltham Forest

Walthamstow Area Action Plan

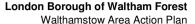
7.	Reduce the overall level of deprivation	~	~	~	~	~	~	~	~	~	~	~	~	~	+	~	~	~	~	~
8.	Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system	?	~	~	~	~	~	~	~	~	+	~	~	~	~	~	~	~	2	~
9.	Reduce production of waste and increase recycling	2	~	~	~	~	~	~	~	-	2	~	~	~	~	~	2	2	~	~
10.	Reduce greenhouse gas emissions	?	~	~	~	-	~	-	?	1	?	~	~	~	~	-	?	2	~	~
11.	Conserve energy	?	~	~	~	-	~	-	?	-	?	~	~	~	~	-	?	?	~	?
12.	Improve air quality through a reduction in traffic-based emissions	l	?	~	~	~	?	~	2	?	?	-	2	-	~	1	?	2	?	?
13.	Improve water quality and ensure the efficient use of water resources	٧	~	~	~	~	~	~	2	٧	2	~	~	~	~	~	?	2	٧	?



London Borough of Waltham Forest

Walthamstow Area Action Plan

14. Reduce the risk of flooding	~	~	~	~	~	~	~	~	~	~	~	~	~	~	~	~	~	~	~
15. Reduce contamination and safeguard soil quality and quantity	~	~	?	~	~	~	~	~	~	~	~	~	~	~	~	~	~	~	~
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.	2	~	~	~	~	~	~	+	+	2	~	~	2	2	~	~	2	~	~
20. Conserve and, where appropriate, enhance the historic environment	2	+	~	~	+	?	~	?	?	2	~	2	?	?	2	?	2	2	~





21. Maintain and enhance to and viability of the Borou centres		+	+	+	+	+	+	+	+	+	?	+	~	+	٧	+	+	~	+	~
22. Improve the local eco attracting inward investment		+	+	+	+	+	+	+	+	+	?	+	+	+	?	+	+	+	+	+
23. Maintain stable lev employment in the Boroug	/els of gh	~	~	~	+	+	+	+	~	+	~	+	2	+	+	+	+	~	+	+

Policies for key opportunity sites are likely to lead to positive effects with respect to sustainability objectives related to housing, crime, community facilities, PDL and use of existing buildings, and those relating to local economic vitality and employment. Policies which support the re-use of currently vacant and derelict buildings have been identified as providing significant positive effects with respect to sustainability objective 16 (make the best use of PDL and existing buildings). Relatively few negative sustainability effects have been identified and these are all minor. The minor negative effects result from policies which are designed to bring forward uses which use large amounts of energy and/or could encourage increased traffic. However, these negative effects may be mitigated by the AAP's area wide policies and those in the draft Core Strategy.

Recommendations

Additional detail could be provided within key opportunity site policies on how sites could or should be linked with wider blue and green assets. This would help ensure development proposals maximise improvements sought through WTC 15, particularly in light of the loss of open space resulting from WTPC 7 and 8.

Restrictions on private car ownership or opportunities to promote car clubs could be explored to help minimise reliance on private car amongst residents in new housing units. Additionally, the promotion of electric vehicle charge points could be encouraged, particularly in conjunction with opportunity sites that are likely to attract private vehicles (e.g. WTCP 15).



Annex III - Compatibility of AAP Objectives

13.3.2 **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.

Table A: Sustainability Assessment of AAP Strategic Objectives

✓	Generally compatible	×	Generally incompatible	~	No relationship	?	Compatibility depends upon implementation
----------	----------------------	---	------------------------	---	--------------------	---	---

					AA	AP Strate	gic Objec	tives			
SA Objective	es	1	2	3	4	5	6	7	8	9	10
	1	~	~	~	✓	~	~	~	~	~	~
	2	~	~	\checkmark	?	✓	~	\checkmark	~	~	~
Social	3	~	~	~	✓	~	✓	~	~	~	~
	4	~	~	\checkmark	~	✓	~	✓	~	~	✓
	5	~	~	~	~	~	~	~	~	~	?
	6	~	~	~	~	~	~	~	~	✓	?
	7	~	~	✓	~	~	~	~	~	✓	~
	8	~	~	~	~	✓	✓	✓	~	~	~
	9	~	~	~	~	~	~	~	~	~	~
	10	~	~	~	~	✓	✓	~	~	~	~
	11	~	~	?	?	~	\checkmark	~	~	~	~
<u> </u>	12	~	~	~	~	?	\checkmark	?	~	~	~
ent	13	~	~	~	~	~	~	~	~	~	~
Environmental	14	~	~	~	?	~	~	2	~	~	~
ē	15	~	~	~	~	~	~	2	~	~	~
Ē	16	~	~	?	?	~	~	~	~	~	~
ш	17	~	~	~	~	~	~	~	~	~	~
	18	~	~	~	~	~	~	~	~	~	~
	19	~	~	?	?	~	✓	?	✓	~	✓
	20	\checkmark	~	?	?	~	?	?	✓	~	~
0.5	21	\checkmark	\checkmark	\checkmark	✓	✓	~	✓	\checkmark	\checkmark	\checkmark
Eco nom ic	22	\checkmark	\checkmark	✓	✓	~	~	✓	?	✓	✓
	23	\checkmark	\checkmark	\checkmark	~	~	~	\checkmark	~	✓	\checkmark

Summary

- 13.3.3 The AAP Strategic Objectives are generally compatible with the SA Objectives. There are no Strategic Objectives that are identified as incompatible; however there are some cases where the relationship is uncertain and would depend upon implementation.
- 13.3.4 In general the AAP Objectives perform well against the socially orientated SA Objectives; however, the extent to which they will contribute to SA Objective 5 to improve education attainment in schools is unclear. Although no schools are located within the AAP area Waltham Forest ranks poorly (377th out of 408 local areas in Great Britain) in terms of overall skills and qualifications.
- 13.3.5 The Strategic Objectives perform most strongly against the economic SA Objectives reflective of the vision to build and expand the existing retail offer and a strong growth agenda. As a result the compatibility of the AAP Objectives against the SA Environmental Objectives is less certain.



13.3.6 Notably, none of the AAP objectives are identified to contribute towards the Environmental SA Objectives 9 (Reduce production of waste and increase recycling), 13 (Improve water quality and ensure the efficient use of water resources), 15 (Reduce contamination and safeguard soil quality and quantity), 17 (Conserve and enhance biodiversity) or 18 (Protect the ecological integrity of Natura 2000 sites). Furthermore the AAP Objectives performance against SA Objectives 14 (Reduce the risk of flooding) and 16 (Make the best use of previously developed land and existing buildings) is unclear. In particular AAP Objectives 3, 4 and 7 could potentially be incompatible with the Environmental SA objectives depending on implementation.