

**London Borough of Waltham Forest  
Submission Local Plan Part 1**

**Sustainability Appraisal Report  
Examination Addendum**



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# 1 Introduction

## 1.1 This document

This addendum should be read alongside the SA Report which accompanied the Submission version of the London Borough of Waltham Forest Local Plan Part 1 (LP1)(April 2021).

Modifications have been proposed following Examination hearings in March 2022. These have been screened and where they could make a significant difference to the SA, the assessments of policies have been updated. This Addendum reports on the updated residual effects of the LP1 with modifications.

This Addendum also provides information in support of questions raised within the Inspectors' letter dated 05/05/21.

The remaining sections of this document are structured as follows:

- **Section 2 Methodology** briefly describes the approach to the SA;
- **Section 3 Alternatives** describes the alternatives identified and assessed, the findings of the assessment of a new growth alternative and the reasons for choosing the alternatives. This section is supported by Appendices A and B;
- **Section 4 Sustainability Performance of the Modified Local Plan Part 1 Policies** presents the residual potential significant effects of the Local Plan policies which have changed following modifications. This section is supported by Appendix C;
- **Section 5 Mitigation Measures** describes amended measures as a result of modifications and further information.

## 2 Approach to the SA

### 2.1 SA process

The SA process is shown in Figure 1. The LP1 is currently in Stage 3 Examination according to Figure 1 and the SA is in Stage D2 (ii): Appraising significant changes resulting from representations.

Local Plan Stage 1: Pre-production - Evidence Gathering	<b>SA Stages and Tasks</b> Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope <i>A1: Identifying other relevant policies, plans and programmes, and sustainability objectives</i> <i>A2: Collecting baseline information</i> <i>A3: Identifying sustainability issues and problems</i> <i>A4: Developing the SA Assessment framework</i> <i>A5: Consulting on the scope of the SA</i>
Local Plan Stage 2: Production	<b>SA Stages and Tasks</b> Stage B: Developing and refining options and assessing effects <i>B1: Testing the plan objectives against the SA assessment framework</i> <i>B2: Developing the plan options and preparing an Initial or draft SA Report (not a statutory report)</i> <i>B3: Predicting the effects of the plan and its alternatives</i> <i>B4: Evaluating the effects of the plan and its alternatives</i> <i>B5: Considering ways of mitigating adverse effects and maximising beneficial effects</i> <i>B6: Proposing measures to monitor significant effects of implementing local plans</i> Stage C: Preparing the formal SA Report <i>C1: Preparing the formal SA Report</i> Stage D: Consulting on the preferred options of the Local Plan and SA Report <i>D1: Public participation on the preferred options of the Local Plan and the SA Report D2(i): Appraising significant changes</i>
Local Plan Stage 3: Examination	<b>SA Stages and Tasks</b> D2 (ii): Appraising significant changes resulting from representations
Local Plan Stage 4: Adoption and monitoring	<b>SA Stages and Tasks</b> D3: Making decisions and providing information Stage E: Monitoring the significant effects of implementing the Local Plan <i>E1: Finalising aims and methods for monitoring</i> <i>E2: Responding to adverse effects</i>

**Figure 1: The SA Process**

The full methodology of the SA is presented within Section 2 of the SA Report (April 2021) which accompanied the LP1 at Submission and can be found here:

<https://www.walthamforest.gov.uk/planning-and-building-control/planning-policy/local-plan/local-plan-submission-planning>

Table 1 presents the SA Framework of objectives against which the LP1 and its alternatives have been appraised. The key sustainability issues identified for the Borough are shown alongside the SA Objectives within table 1 and these have been used to guide the assessments.

Table 2 presents the significance definitions used in the assessments.

**Table 1: SA Framework**

SA Objective	Description	Key Sustainability Issues
SA1	Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	<ul style="list-style-type: none"> <li>As the population continues to increase so does the demand for housing, infrastructure and facilities</li> <li>The population density within the Borough exceeds both the London and the national averages</li> <li>There is a need to create high quality places to live, work and recreate that are mixed and well-balanced in terms of tenure and income</li> <li>Promote high quality housing with a range of tenures to reduce health issues which arise from poor quality accommodation</li> <li>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</li> <li>There is a shortfall in the provision of affordable housing to meet the requirements of those in housing need</li> <li>There is a potential shortfall in the provision of family accommodation and there is overcrowding, primarily in the private rental sector</li> <li>Homelessness is expected to increase</li> <li>Need to offer greater quality, flexibility and choice to those who rent.</li> <li>There is a need to increase the supply of well-designed housing of all tenures</li> <li>Need to introduce more flexible approaches for affordable housing contributions to encourage open market and mixed tenure specialist older people's housing.</li> </ul>
SA2	Reduce crime and the fear of crime	<ul style="list-style-type: none"> <li>Increases in racist and religious hate crimes</li> <li>The percentage of residents that are worried about crime in the Borough remains higher than the London average</li> <li>Need to provide safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life</li> <li>Need to develop an approach to tackling crime, improving liveability and reducing anti-social behaviour.</li> </ul>
SA3	Improve standard of health and wellbeing of those who live	<ul style="list-style-type: none"> <li>Currently a large proportion of the population are aged over 50 and this is projected to rise over the next 20 years (+26% rise by 2021)</li> <li>Improve life expectancies through promoting healthy lifestyles for all ages</li> </ul>

SA Objective	Description	Key Sustainability Issues
	<b>and work in the Borough</b>	<ul style="list-style-type: none"> <li>• Need to ensure adequate access to green spaces and recreational facilities to promote active and healthy lifestyles</li> <li>• Need to increase recognition of the growing evidence of a relationship between physical and mental health</li> <li>• Need to ensure that hospitals have fit for purpose facilities (i.e. less converted houses) that meet the needs of patients</li> <li>• Need to increase levels of active travel throughout the Borough in order to increase physical activity levels and tackle poor air quality.</li> <li>• Childhood obesity rates are higher within Waltham Forest than both regionally and nationally</li> <li>• TB remains a disease which is of high prevalence within the Borough</li> <li>• There is a need to protect open space of varying types, which is used heavily by residents of the Borough. For example, allotment space.</li> </ul>
<b>SA4</b>	<b>Improve community cohesion and reduce inequalities through the provision of community facilities to meet local cultural, educational, recreational and social needs</b>	<ul style="list-style-type: none"> <li>• There are inequalities in health and life expectancy between ethnic groups</li> <li>• Disparities between wards, particularly between the north and south of the Borough</li> <li>• Need to provide inclusive services; promote equal opportunities; oppose discrimination, intolerance and disadvantage through reducing inequalities and promoting community cohesion</li> <li>• Help to support development of successful neighbourhoods</li> <li>• There is a need to create high quality places to live, work and recreate that are mixed and well-balanced in terms of tenure and income</li> <li>• Adequate support and facilities for older residents, including independent living, has been noted in particular to be needed</li> <li>• Need to build on Borough's arts, culture and sport strengths across the Borough's diverse and changing population.</li> <li>• Need to reduce the number of older people who feel socially isolated, by getting them actively participating in community life</li> <li>• Currently a large proportion of the population are aged over 50 and this is projected to rise over the next 20 years (+26% rise by 2021)</li> <li>• Need to ensure that growth supports the delivery of vital infrastructure and new facilities across the Borough</li> <li>• Help to support development of successful neighbourhoods</li> <li>• Need to ensure that all residents have access to training and skills development to enable them to access and progress into high quality employment.</li> </ul>
<b>SA5</b>	<b>Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system, reducing car use for all</b>	<ul style="list-style-type: none"> <li>• Continual growth in car ownership will contribute to further air pollution, and associated impacts on climate, human health and biodiversity</li> <li>• Need to work towards improving air quality and reducing noise impacts from transport</li> <li>• There is a need to make public transport more accessible in some areas of the Borough</li> <li>• There is a need to promote walking and cycling (building on Enjoy Waltham Forest ("Mini Holland") programmes) for local journeys in place of travel by private car. There should also be a focus on promoting public transport use instead of cars for medium and longer journeys</li> </ul>

SA Objective	Description	Key Sustainability Issues
	<b>journey lengths</b>	<ul style="list-style-type: none"> <li>• There is a need to reduce car parking spaces in order to discourage private car use and improve air quality</li> <li>• One in five journeys each weekday morning and afternoon involves trips to school, even though most journeys to schools are under a mile. There is a need to reduce school journeys by reducing Drop Off/Pick Up arrangements for new school developments, and encouraging sustainable, active travel amongst school pupils</li> <li>• As the population grows, so does the need to change current infrastructure to meet the demands of all residents whilst making it future proof</li> <li>• Need to ensure that growth supports the delivery of vital infrastructure and new facilities across the Borough</li> <li>• Need to provide public transport capacity and safeguard land for transport</li> <li>• Help to enhance London’s transport connectivity</li> <li>• Improvements to road safety are needed to reduce casualties</li> <li>• Need to make cycle parking safe and easy to use</li> <li>• There is a need to provide electric vehicle infrastructure, such as charging points.</li> </ul>
<b>SA6</b>	<b>Prevent production of waste, improve resource efficiency and increase recycling and recovery</b>	<ul style="list-style-type: none"> <li>• The amount of waste produced is reducing but still exceeds both the London and national average</li> <li>• The London Plan encourages greater self-sufficiency for waste management in London and sustainable transportation of waste.</li> <li>• Recycling is increasing but still falls short of government targets</li> <li>• Need to ensure that growth supports the delivery of vital infrastructure and new facilities across the Borough</li> <li>• Need to minimise the impact of municipal waste management on the Borough’s environment</li> <li>• Need to reduce the carbon footprint of municipal waste</li> <li>• Need to ensure that all waste is managed in the most environmentally friendly way.</li> </ul>
<b>SA7</b>	<b>Reduce greenhouse gas emissions and promote low carbon growth</b>	<ul style="list-style-type: none"> <li>• Greenhouse gas emissions need to be stabilised and reduced over time</li> <li>• Help promote low carbon heat network</li> <li>• Need to identify opportunities for growth of the low carbon economy in the Upper Lee Valley</li> <li>• There is a need to provide electric vehicle infrastructure, such as charging points.</li> </ul>
<b>SA8</b>	<b>Conserve energy</b>	<ul style="list-style-type: none"> <li>• There is a need to continue to promote the construction of energy efficient buildings, and to support the installation of renewable and low or zero carbon technology.</li> </ul>
<b>SA9</b>	<b>Improve air quality</b>	<ul style="list-style-type: none"> <li>• Continual growth in car ownership will contribute further air pollution</li> <li>• Reliance on the petrol or diesel-fuelled private car as the main mode of transport</li> <li>• Air pollution from the strategic road network is an issue across the Borough and NO<sub>2</sub> emissions are remaining constant, not decreasing as predicted</li> <li>• Increasing use of biofuels (biodiesel and biomass) for heating schemes will cause further air quality issues</li> <li>• Need to help reduce pollution from road vehicles, buildings, industry and construction</li> </ul>



SA Objective	Description	Key Sustainability Issues
		<ul style="list-style-type: none"> <li>• Need to improve efficacy of measures within the AQMA</li> <li>• There is a need to provide electric vehicle infrastructure, such as charging points.</li> </ul>
<b>SA10</b>	<b>Improve water quality in rivers and groundwater and ensure the efficient use of water resources</b>	<ul style="list-style-type: none"> <li>• Diffuse urban water pollution exists in local rivers and water bodies</li> <li>• There should be no deterioration in the health and quality of existing water bodies and development should improve the status of water bodies to achieve 'Good Overall Status in accordance with the Water Framework Directive', such as through installing rain planters and reed beds</li> <li>• Increasing population will put strain on water resources</li> <li>• Potential impacts of the Local Plan policies and site allocations on groundwater need to be identified and addressed.</li> </ul>
<b>SA11</b>	<b>Reduce the risk of flooding and improve resilience to climate change</b>	<ul style="list-style-type: none"> <li>• High number of properties risk of flooding and there is a need to promote flood resistance and resilience measures for existing and future properties to ensure they are resilient to the future effect of climate change and protected against future flood risk. In response to this risk proposals have been developed for Critical Drainage Areas.</li> <li>• Natural flood management techniques should be promoted</li> <li>• New development will need to incorporate SUDS to sustainably reduce flood risk</li> <li>• Need to promote the use of new technologies and innovation in flood mitigation measures</li> <li>• There will be an increasing need to plan for and implement/facilitate climate change adaptation, in respect of rising temperatures, water scarcity and extreme weather events, particularly heavy rainfall/flooding</li> <li>• There is a need to plan and prepare for the expected impacts of unavoidable climate change by developing adaptation responses and building resilience</li> <li>• New developments need to minimise vulnerability and provide resilience to climate change</li> <li>• There is a need to work with communities to help tackle climate change.</li> </ul>
<b>SA12</b>	<b>Ensure the efficient use of land and buildings and protect soil quality and geological resources</b>	<ul style="list-style-type: none"> <li>• There is finite availability of previously developed land for development; this may result in the use of greenfield land in the future</li> <li>• There is a need to protect soils and the important ecosystem services they provide – particularly during construction and development</li> <li>• Need to protect designated geological sites.</li> </ul>
<b>SA13</b>	<b>Conserve and enhance biodiversity and the natural environment, improving resilience to climate change</b>	<ul style="list-style-type: none"> <li>• Support is needed to achieve local BAP targets</li> <li>• Need to promote effective land-management to support, protect and enhance biodiversity</li> <li>• Increases in population will cause a demand for more development, where there is a potential for loss of valuable habitats which have yet to be designated for nature conservation as a direct result</li> <li>• Consider and plan for the impacts of climate change on species and habitats</li> <li>• There is a need to help encourage people to engage with the ownership, design, management, maintenance and use of their environment as part of their own vision for their neighbourhood</li> </ul>

SA Objective	Description	Key Sustainability Issues
		<ul style="list-style-type: none"> <li>• Need to recognise the wider benefits of ecosystem services and manage impacts on biodiversity</li> <li>• Increase awareness that green infrastructure and resilient ecological networks play an important role in aiding climate change adaptation and resilience</li> <li>• Seek to enhance green infrastructure networks within the Borough</li> <li>• Ensure current ecological networks are not compromised, and future improvements in habitat connectivity are not prejudiced</li> <li>• In line with NPPF paragraph 174, new development should achieve biodiversity net-gain in a hierarchical approach with on-site net-gain being preferred and off-site compensation as a last resort</li> </ul> <p>Need to work to conserve and enhance the local environment.</p>
SA14	<p><b>Protect the ecological integrity of SSSI and Natura 2000 sites</b></p>	<ul style="list-style-type: none"> <li>• Large areas of the SSSI sites are considered to be in either unfavourable with no change or to be in an unfavourable and declining condition</li> <li>• SSSIs and European sites within the Borough are under threat from poor air quality, recreational pressure and urban effects (including issues with litter)</li> <li>• Need to protect and enhance the wildlife and habitats in Waltham Forest, in particular those of international, national and regional importance.</li> </ul>
SA15	<p><b>Maintain and enhance the quality of the green belt and open space areas</b></p>	<ul style="list-style-type: none"> <li>• Large areas of open space are Metropolitan Green Belt. There is a need to protect these areas of open space from development pressure.</li> <li>• There is a need to protect open space of varying types, which is used heavily by residents of the Borough. For example, allotment space.</li> </ul>
SA16	<p><b>Maintain and improve local distinctiveness</b></p>	<ul style="list-style-type: none"> <li>• Need to establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit</li> <li>• Need to work towards conserving local character and history, by reflecting the identity of local surroundings and materials. This should not prevent or discourage appropriate innovation.</li> </ul>
SA17	<p><b>Conserve and enhance the historic built environment</b></p>	<ul style="list-style-type: none"> <li>• A number of listed buildings are identified as being in poor condition and are have been included on Historic England's Heritage at Risk Register. Opportunities exist to improve the condition of some listed buildings through development</li> <li>• The Borough contains 20 Archaeological Priority Areas where there is significant known archaeological interest or potential for new discoveries</li> <li>• Ensure that the Conservation Areas, Heritage Assets and features are preserved or enhanced</li> <li>• New developments should respect the urban and historic context, improve townscape and leave a positive architectural legacy</li> <li>• Impacts of future development on the local historic environment need to be considered</li> <li>• Heritage assets should be managed to sustain their significance</li> <li>• Ensure that everyone is able to participate in understanding and sustaining their local historic environment</li> <li>• Development could encroach on Conservation Areas and subsequently negatively affect townscape and heritage assets.</li> </ul>

SA Objective	Description	Key Sustainability Issues
<b>SA18</b>	<b>Maintain and enhance the vitality and viability of the Borough's town centres</b>	<ul style="list-style-type: none"> <li>• Further action is needed in order to support and promote retail, business, cultural, leisure and residential investment in town centres.</li> <li>• Support is required for the creation of the Creative Enterprise Zone around Blackhorse Lane.</li> </ul>
<b>SA19</b>	<b>Improve the local economy by enabling employment developments in appropriate places</b>	<ul style="list-style-type: none"> <li>• Lower than average salaries could affect the Borough's ability to attract inward investment</li> <li>• Continue to support the Upper Lee Valley Development Opportunity Area and celebrate its industrial heritage</li> <li>• There are likely to be ongoing pressures on industrial sites, need to maintain industrial uses and promote strong local base of small businesses</li> <li>• Need to provide additional workspaces and promote denser, mixed use development with no net loss of business floor space.</li> </ul>

**Table 2: Significance Definitions used in the SA**

Symbol	Definitions of Significance of Effects Against the SA Objectives	Assumptions on the nature of effects
++	<b>Significant Positive Effect:</b> the policy or option supports the achievement of this objective; it addresses all relevant sub-objectives and could result in a potentially significant beneficial effect e.g. improved access by walking and cycling modes to a local or town centre	Permanent Continual Magnitude: High 80%+ receptor or environmental capacity affected; or Medium 40-80% of receptor or environmental capacity of affected The effect could be to: <ul style="list-style-type: none"> <li>• enhance and redefine the location in a positive manner, making a contribution at a national or international scale;</li> <li>• enhance and redefine the location in a positive manner;</li> <li>• repair or restore receptors badly damaged or degraded through previous uses; and/or</li> <li>• improve one or more key elements/features/ characteristics of a receptor with recognised quality such as a specific regional or national designation.</li> </ul>
+	<b>Minor Positive Effect:</b> the policy or option supports the achievement of this objective; it addresses some relevant sub-objectives, although it may have only a minor beneficial effect	Reversible Infrequent or intermittent Magnitude: Low 20-40% of receptor or capacity affected. The size, nature and location of a proposed scheme would: <ul style="list-style-type: none"> <li>• improve undesignated yet recognised receptor qualities at the neighbourhood scale;</li> <li>• fit into or with the existing location and existing receptor qualities; and/or</li> <li>• enable the restoration of valued characteristic features partially lost through other land uses.</li> </ul>
0	<b>Neutral Effect:</b> the policy or option has no impact or effect and is neutral insofar as the benefits and drawbacks appear equal and neither is considered significant	N/A

Symbol	Definitions of Significance of Effects Against the SA Objectives	Assumptions on the nature of effects
?	<b>Uncertain Effect:</b> Uncertain or insufficient information on which to determine the assessment at this stage	N/A
-	<b>Minor Negative Effect:</b> the policy or option appears to conflict with the achievement of this objective; it does not address relevant sub-objectives and may result in minor adverse effects	Reversible Infrequent or intermittent Magnitude: Low 20-40% of receptor or capacity affected. The size, nature and location of a proposed scheme would: <ul style="list-style-type: none"> <li>• be out of scale with the location; or</li> <li>• leave an adverse impact on a receptor of recognised quality such as a specific district or county designation.</li> </ul>
--	<b>Significant Negative Effect:</b> the policy or option works against the achievement of this objective; it could exacerbate relevant sub-objectives and may result in a potentially significant adverse effect e.g. loss of all or part of a designated ecological site of national importance.	Permanent Irreversible Continual Magnitude: High 80%+ receptor or environmental capacity affected; or Medium 40-80% of receptor or environmental capacity of affected The effect could be to: <ul style="list-style-type: none"> <li>• permanently degrade, diminish or destroy the integrity of the receptor;</li> <li>• cause a very high-quality receptor to be permanently changed and its quality diminished;</li> <li>• cannot be fully mitigated and may cumulatively amount to a severe adverse effect;</li> <li>• be at a considerable variance to the location, degrading the integrity of the receptor; and/or</li> <li>• will be substantially damaging to a high-quality receptor such as a specific regional or national designation.</li> </ul>

## 3 Alternative Options

### 3.1 Introduction

This section describes the reasonable alternatives to the LP1 identified and provides discussion around their potential sustainability effects and reasons why options were selected. This section provides additional information to that presented within Section 6 of the SA Report (April 2021).

### 3.2 Scale of Growth

The Local Plan was prepared to trail the London Plan through its examination and adoption, and as such the scale of growth which the plan was expected to respond to was to be set by the London Plan. Between the Regulation 18 and 19 consultations on the Local Plan, the Examination of the London Plan, and further publication of the 'Intend to Publish' London Plan occurred. The changes made to the London Plan at this time reduced the housing targets for Waltham Forest in Table 4.1 of the London Plan from 17,940 to 12,640. In between these changes being published, LBWF continued preparation of the evidence base to support the Local Plan. This involved consideration of how the Council would meet the overall housing target of 17,940 net new homes.

Having been directed to prepare a plan to deliver a minimum of 17,940 new homes over the 10-year period covered by the London Plan it was considered that there was no reasonable alternative to doing so. However, following the change to the London Plan, the scale of growth question was not reopened, and was not subject to further consideration as a new reasonable alternative. This has since been identified as an omission from the SA process by the Planning Inspector (letter dated 05/05/22) and has been rectified through the assessment of the alternative scale of growth as set out in Section 4 below. The testing of the alternative scale of growth enables the relative performance of the adopted London Plan housing target to be compared with the proposed LP1 housing target. Both options have been appraised in August 2022 to ensure that the assessments make use of the same baseline information and are therefore comparable.

### 3.3 Sustainability Performance of Growth Scale Options

The two identified reasonable alternatives for the scale of growth are:

**Option 1:** The preferred Scale of Growth policy within LP1 sets out a scale of growth across the Borough and includes a minimum net increase of housing to be provided which is a minimum of 27,000 additional homes. Taking into account permitted developments, the up to date housing trajectory for this scale of growth over the plan period of 2023-2038 is as follows:

**Table 3: Option 1 Stepped Housing Trajectory Target**

Years															
2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33	2033-34	2034-35	2035-36	2036-37	2037-38	Total
1,264	1,264	1,264	1,264	1,504	1,504	2,404	2,404	2,404	2,404	2,404	2,404	1,504	1,504	1,504	27,000

**Option 2:** The London Plan alternative scale of growth is 12,640 or 1,264 dwellings per year over the ten year period 2019/20 to 2028/29. It is assumed that this annual requirement would be extended to the end of the Local Plan period (2038) therefore delivering a total of 20,224 between 2023-2038:

**Table 4: Option 2 London Plan Housing Trajectory Target**

Years															
2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33	2033-34	2034-35	2035-36	2036-37	2037-38	Total
1,264	1,264	1,264	1,264	1,264	1,264	1,264	1,264	1,264	1,264	1,264	1,264	1,264	1,264	1,264	20,224

The findings of the assessments are summarised below and the details of the assessments can be found within Appendix A.

**Table 5: Summary Sustainability Performance of the Growth Options**

Option Name	Sustainability Objective Number (from SA Framework)																			
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
Option 1 OAN	++	0	0	0	0	-	0	0	+	0	?	0	0	?	0	0	0	+	+	+
Option 2 London Plan	--	0	0	0	0	-	0	0	?	0	+	0	0	?	0	0	0	+	+	+

The key to the sustainability significance ‘scores’ in Table 5 can be found in Table 2. As Table 5 demonstrates, the SA assessment findings of the two growth options show a similar performance for the majority of SA Objectives. However, the key differences are with regards to housing delivery and flood risk. By meeting the identified housing needs for the Borough, Option 1 is predicted to result in a potential significant positive affect with regards to the housing SA objective (SA1) whereas Option 2 would not deliver the identified housing needs of the Borough and therefore a potential significant negative effect is identified.

The scales of growth proposed in options 1 and 2 have the potential to increase air pollution from transport and developments. A vehicle trip generation exercise has been undertaken evaluating how the identified locations which would deliver the growth of the Local Plan

(identified in LP2) would affect traffic levels within the borough. This exercise<sup>1</sup> concludes that the LP1 will bring about reductions in traffic compared to the situation without the LP1. Along with other policies within the Local Plan, such as policy 90 Air Pollution, there is a potential for air quality within the borough to improve due to the development proposed within LP2. A potential minor positive effect is therefore recorded against SA9 for Option 1.

Although fewer developments might result from Option 2, it might result in less redevelopment of sites which currently result in high amounts of traffic generation because of their current use. The performance of Option 2 is therefore uncertain against SA9.

With regards to SA11 and flood risk, an evidence-led approach to considering appropriate sites for development has been undertaken by LBWF to steer development towards areas of lowest flood risk. A sequential test exercise (Sequential Test Statement, LBWF, July 2022) has been completed which examines the sites available for development within the borough and their anticipated capacity for residential development. The evaluation of sites within the sequential test has been based on Flood Risk criteria which take account of the risk posed to the site by tidal, fluvial and surface water sources as well as any sites which intersect an ordinary watercourse or have a history of flooding. Capacity has been identified for approximately 10,290 net additional units on strategic and key sites in Flood Zone 1. Capacity has been identified for approximately 3,580 dwellings on smaller sites proposed for inclusion on the borough's Brownfield Land Register in Flood Zone 1. Additional capacity cannot be found in locations which fall within Flood Zone 1. In total, potential housing capacity of 13,870 dwellings has been identified in Flood Zone 1 within the borough. This capacity falls short of the housing delivery in Option 1 (a minimum of 27,000 or approximately 1,800 dwellings a year over 15 years).

Sites identified as being within Flood Zones 2 and 3 have been taken forward for further assessment as part of the SFRA for Waltham Forest, in order to identify how the housing target could be delivered. The sequential test exercise has identified capacity for an additional 11,013 net additional units on strategic and key sites in Flood Zone 2 and 3. Combined with the capacity within Flood Zone 1 this totals 24,883.

Approximately 50% of the Option 1 scale of growth option could be delivered on sites within flood zone 1 and 50% would need to be delivered on sites within flood zones 2 and 3 (circa 10,000 homes). Proposed developments in zones 2 and 3 would need to adhere to Local Plan Policy 93 Managing Flood Risk which requires mitigation and minimisation of flood risk through site Flood Risk Assessment and development design. If a proposal did not adhere to this policy it would not be granted permission. As it is not certain that all developments would be granted permission in Flood Zones 2 and 3, an uncertain effect is therefore identified.

As the majority of the Option 2 scale of growth option could be delivered on sites within flood zones 1 and 2 and there are policies within the LP1 (e.g. Policy 93 Managing Flood Risk), which will mitigate and minimise potential negative effects on flood risk from developments and help to improve resilience to climate change, an overall minor positive effect is identified against SA11 for Option 2.

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<sup>1</sup> Waltham Forest Local Plan Air Quality Study 2 Draft (WSP, September 2022)



The HRA of the LP1 has concluded that there will be no adverse effects on European sites subject to the finalisation of mitigation for potential recreation effects on Epping Forest SAC. This is pending ratification/agreement by the Natural England strategic solutions board. Until the recreation mitigation strategy is finalised an uncertain effect is identified for both options with regards to SA14. With a lower scale of growth proposed Option 2 could represent a lower risk of adverse effects compared to Option 1 and could in turn require less mitigation to avoid potential adverse effects.

The assessments of both options identified a potential significant positive effect with regards to SA18 (town centres). Both options include a minimum net increase of employment floorspace of 52,000sqm. This will contribute to promoting further investment in the Borough's town centres and supports the achievement of SA18 and addresses key sustainability issues.

### 3.4 Preferred Scale of Growth Option

The 'Option 1 – OAN' growth option is the preferred policy option, as it goes as far as possible to meet the need for new homes in the borough, whilst also securing high quality design, protecting and enhancing the character of local areas, providing new and improved green spaces and public realm, responding to the climate emergency, and significantly reducing flood risk, creating safer spaces, reducing fear of crime, maximising the number of local jobs and employment space, and delivering a whole range of community infrastructure, including health facilities, a new hospital, public transport/station improvements, facilities for young people and new cultural amenities.

In terms of air quality, the WSP Air Quality Study 2 (September 2022) shows that overall the plan will result in a likely reduction in air pollution and traffic levels. Redevelopment of fewer sites which are currently in high-trip generating uses could give Option 2 a less favourable air quality outcome.

Option 1 locates more new homes in areas of medium and high flood risk. However, this is considered to be justified by LBWF by the potential significant positive effect with regards to SA1, and the policies with the Local Plan (Policy 93) which will mitigate and minimise potential negative effects on flood risk from development and help to improve resilience to climate change.

### 3.5 Spatial Strategy Options

Options for the LP1 spatial strategy have been considered at two key points in the development of the plan; at the beginning of the process in 2017 and, following initial consultation and choice of a spatial strategy, during 2018 when the spatial strategy was being further developed.

LBWF consulted on a new Local Plan 'Direction of Travel' document in November – December 2017. The Direction of Travel document was the first stage in the engagement process with residents, businesses and other stakeholders on what the new Local Plan should contain. It

presented the challenges and opportunities for the Borough and a Vision for Waltham Forest, looking ahead to what the Borough will be like in 15 to 20 years' time.

The Direction of Travel document presented options for consultation, comprising six spatial strategy options (strategic growth options) for development in the Borough along with a number of policy direction options. The 'strategic growth options' were considered as areas in which development could be focused. These areas did not have defined boundaries but were a general guidance of locations within the Borough that Waltham Forest Council identified as options to locate future development.

The Direction of Travel strategic growth options were:

- Option 1: Developer Led;
- Option 2: Key Growth Areas;
- Option 3: Growth Hubs;
- Option 4: Town Centres;
- Option 5: Combined Approach; and
- Option 6: Exceptional Circumstances.

These options were subject to SA and an HRA screening exercise in 2017.

The full report of the assessment of options can be found within Appendix D of the SA Report (April 2021) available here: <https://www.walthamforest.gov.uk/planning-and-building-control/planning-policy/local-plan/local-plan-submission-planning>

HRA screening of options was presented within the Sustainability Appraisal of the 'Direction of Travel' Document (November 2017) which is available here:

<https://www.walthamforest.gov.uk/planning-and-building-control/planning-policy/local-plan/evidence-base>

Following consultation on the Direction of Travel document in 2017 and consideration of the findings of the SA, Option 5: Combined Approach, was selected as the preferred spatial option and it was further developed.

A Growth Capacity Study was completed in June 2018 on behalf of LBWF<sup>2</sup> which identified a range of potential development sites and their capacities for development across the Borough. This work was used to identify a collection of 'growth clusters' across the Borough, forming a 'New Spatial Strategy' based on the 'Combined Approach' option (Option 5) in order to meet challenging new housing need/targets.

It was considered reasonable that should the New Spatial Strategy not be taken forward then the spatial strategy set out within the existing Core Strategy would continue. Therefore, the SA considered the potential effects of the Existing Spatial Strategy set out within the Core Strategy<sup>3</sup> (2012) as an alternative to the New Spatial Strategy.

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<sup>2</sup> <https://walthamforest.gov.uk/content/evidence-base-development-plan-documents>

<sup>3</sup> Waltham Forest Borough Council, Waltham Forest Local Plan – Core Strategy, 2012

In Summer 2018, the New Spatial Strategy was subject to SA testing and compared with the adopted Core Strategy existing spatial strategy.

The assessment of the two spatial strategy options is summarised and discussed within Section 6 of the SA Report (April 2021) available here: <https://www.walthamforest.gov.uk/planning-and-building-control/planning-policy/local-plan/local-plan-submission-planning>

The full report of the assessment of the spatial strategies in 2018 can be found within Appendix E of the SA Report (April 2021) available here: <https://www.walthamforest.gov.uk/planning-and-building-control/planning-policy/local-plan/local-plan-submission-planning>

### 3.6 Preferred Spatial Strategy Option

After the sustainability testing in 2018, the New Spatial Strategy was further developed into the Local Plan spatial strategy reflected within the Proposal Map and the strategic policies.

The spatial strategy within the Submission LP1 is consistent with the direction from the London Plan (Policy D3) to make best use of land by following a design-led approach to optimising site capacity. The developable area of the borough is highly constrained by Metropolitan Green Belt, Metropolitan Open Land, the Lee/Lea Valley to the west, and Roding Valley and Epping Forest to the north and east. As such all iterations of the spatial strategy have involved optimisation of developable site capacity in line with making best use of available land and focusing development in locations with good public transport connectivity and infrastructure to support the development of sustainable neighbourhoods - well-connected by walking and cycling routes, improved public transport, with leisure and recreation provision and enhanced job opportunities for residents.

### 3.7 Policy Alternatives

As well as presenting spatial strategy options, the Direction of Travel document (November 2017) presented a number of policy direction options for consultation. These options listed below were subject to SA and an HRA screening exercise:

- Decent Homes for Everyone;
- Building a Resilient Economy;
- Providing Physical Infrastructure;
- Meeting Social and Community Infrastructure Needs;
- Distinctive Town Centres and High;
- Growing Our Culture and Visitor Attractions;
- Creating High Quality Places;
- Enhancing and Preserving our Heritage;
- Protecting and Enhancing our Environment; and
- Ensuring Climate Change Resilience.

The sustainability performance of the policy direction options considered in 2017 is presented in Section 6 of the SA Report (April 2021) available here:

<https://www.walthamforest.gov.uk/planning-and-building-control/planning-policy/local-plan/local-plan-submission-planning>.

### 3.8 Preferred Policies

Following the assessment of policy approach options in 2017 and internal consideration of the SA findings, the preferred policies were developed by officers using the Local Plan evidence base and stakeholder engagement between 2017 and 2021.

Appendix B presents information on the alternatives to the LP1 policies, provides justification of why no alternative policy approaches have been identified in some cases and also describes why preferred policies have been selected.

In some cases there are not considered to be any reasonable alternative policy approaches to the preferred policies within LP1. This is mainly due to requirements to meet soundness, planning policy, legal conformity and to align with National guidance.

## 4 Sustainability Performance of the Modified LP1 Policies

### 4.1 Introduction

A detailed assessment of the draft LP1 policies was carried out in Summer/Autumn 2019 and presented in the SA Report of the Regulation 18 consultation (October 2019). At that stage mitigation measures were suggested to address the identified potentially significant or uncertain effects and this mitigation informed the drafting of the Regulation 19 Proposed Submission LP1 policies. The SA report was then updated and published as a Regulation 19 LP1 SA Report in October 2020. It presented the findings of the assessment of the Proposed Submission LP1 policies. Following the Proposed Submission LP1 consultation, modifications were made to the LP1 and it was submitted to the Secretary of State for Examination in Public along with an updated version of the SA Report (April 2021).

Following Examination Hearings in March 2022, further modifications have been proposed and these have been screened to ascertain whether they would make a significant difference to the SA findings. Where necessary, following screening, modified policies have been reassessed and the residual effects of all of the LP1 policies are presented in this section. The potential effects of the other policies within LP1 have not changed can be found within the SA Report available here: <https://www.walthamforest.gov.uk/planning-and-building-control/planning-policy/local-plan/local-plan-submission-planning>

In addition to the potential significant effects identified within Table 6, for SA14, uncertain effects have been identified in relation to SA14 (nature conservation sites) for the following policies:

- Policy 2 - Scale of Growth;
- Policy 3 - Infrastructure for Growth;
- Policy 8 - Character-led Intensification;
- Policy 9 - South Waltham Forest;
- Policy 10 - Central Waltham Forest;
- Policy 11- North Waltham Forest;
- Policy 12 - Increasing Housing Supply;
- Policy 19 - Small Sites;
- Policy 23 - Gypsies and Travellers;
- Policy 26 - Safeguarding and Managing Strategic Industrial Land (SIL);
- Policy 27 - Safeguarding and Managing Change in Locally Significant Industrial Sites (LSIS);

- Policy 28 - Safeguarding and Managing Change in Borough Employment Areas;
- Policy 29 - Approach to Non-Designated Employment Land;
- Policy 30 - Industrial Masterplan Approach;
- Policy 38 - Blackhorse Lane Creative Enterprise Zone;
- Policy 63 - Active Travel;
- Policy 64 - Public Transport; and
- Policy 86 - Food Growing and Allotments.

The HRA of the LP1 has concluded that there will be no adverse effects on European sites subject to the finalisation of mitigation for potential recreation effects on Epping Forest SAC. This is pending ratification/agreement by Natural England strategic solutions board. Until the recreation mitigation strategy is finalised an uncertain effect is identified for these policies.

There are no residual significant negative effects identified in the assessment of the Submission LP1.

Mitigation measures put forward to address residual uncertain effects can be found in the detailed assessments in Appendix C. New mitigation measures are reported in Section 5.

## 4.2 Potential Significant Effects of Policies Changed Following Modification

**Table 6: Summary of Amended Potential Effects of Modified Policies**

Local Plan Policy	Potential Effect Reg 19	Potential Effect with Mods	Potential Significant Effects Description
Policy 2: Scale of Growth	Neutral	Uncertain	SA11: Sequential test information is now available. Approximately 50% of this scale of growth option could be delivered on sites within flood zone 1 and 50% would need to be delivered on sites within flood zones 2 and 3. Circa 10,000 homes would need to be delivered in flood zones 2 and 3. Proposed developments in these zones would need to adhere to Local Plan Policy 93 Managing Flood Risk which requires mitigation and minimisation of flood risk through site Flood Risk Assessment and development design. If a proposal did not adhere to this policy it would not be granted permission. As it is not certain that all developments would be granted permission in Flood Zones 2 and 3, an uncertain effect is therefore identified.
Policy 11: North Waltham Forest	Uncertain	Neutral	SA11: The sequential test statement (LBWF, July 2022) demonstrates that circa 1000 homes can be delivered within the North Waltham Forest area in areas of low flood risk. Therefore a neutral effect is now identified instead of an uncertain effect.
Policy 19: Small Sites	Uncertain	Significant positive	SA12: A significant positive effect is identified because the policy supports infill development on brownfield sites.
Policy 22: Supported and Specialist Accommodation	Minor positive	Significant positive	SA3: The policy promotes schemes for specialist housing, particularly those which are well connected to facilities, social infrastructure and health care which supports the achievement of this objective. Criteria C of the policy also aims to retain current facilities, unless they can be reprovided to an equal or improved standard. It addresses some key sustainability issues and is considered to have potential for a significant positive effect, although it is noted that this is of medium magnitude due to the specialised nature of the policy.

### 4.3 Potential Cumulative Effects

Potential cumulative effects of the LP1 have been updated following modifications to policies and further work in relation to the HRA.

A vehicle trip generation exercise (WSP, September 2022) has been undertaken on behalf of LBWF evaluating how the identified locations which would deliver the growth of the LP1 (identified in LP2) would affect traffic levels within the borough. The exercise has identified that the redevelopment of the sites identified in LP2 would result in a reduction in traffic compared to the situation without the Local Plan. This evidence has removed a potential negative cumulative effect on air quality with growth in neighbouring areas such as London Boroughs of Enfield, Haringey, Hackney, Redbridge and Epping Forest District previously identified in the SA (Report April 2021).



## 5 Mitigation Measures

Mitigation put forward in the SA at Regulation 18 and Regulation 19 stages was considered by LBWF officers and incorporated into the policies for the Submission LP1. This section details new mitigation identified following modifications to policies and availability of further information in relation to flood risk and the HRA.

All mitigation and enhancement measures to improve the performance of some policies are included within the assessment matrices within Appendix C.

**Table 7: New mitigation measures for the LP1**

Theme	Policy	Explanation and Mitigation Measures to Minimise or Avoid Effects
Scale of Growth	2	SA11: The sequential test statement (LBWF, July 2022) demonstrates that half of the minimum housing development proposed can be delivered on sites available in the borough which are in low flood risk areas. Half of the development would need to be located on sites which are in flood zones 2 and 3 and considered to be higher risk flooding areas. Mitigation will be needed, in accordance with LP1 Policy 93 Managing Flood Risk, to ensure measures are put in place on the sites with higher flood risk to manage surface water run off and ensure the sites are resilient to climate change. The Flood Risk Sequential Test Statement recommends that redevelopment of sites at lowest hazard should be prioritised, prior to the consideration of sites at higher flood hazard.
Decent homes for everyone	12	
Scale and location of growth	Numerous policies	SA14: Finalise the recreation mitigation strategy in order to ensure a robust strategy is in place to avoid adverse effects from recreation on Epping Forest SAC.

A previous mitigation measure identified in the SA has been incorporated into Policy 19: Small Sites through policy modifications and this has resulted in an improvement to the sustainability performance from an uncertain effect to a potential significant positive effect. The policy now supports infill development on brownfield sites.

The SA had also recommended that a flood risk sequential test be undertaken. Following completion of a flood risk sequential test (Sequential Test Statement, LBWF, July 2022), which demonstrates that circa 1000 homes can be delivered within North Waltham Forest in areas of low flood risk, a previously identified uncertain effect for Policy 11: North Waltham Forest has changed to a neutral effect.