

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

**Sustainability Appraisal Report
Examination Addendum**

Appendix B: Policy Approach Alternatives



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1 Introduction

This appendix 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.

2 LP1 Policy Alternatives

Policy number and name	Alternatives to the policy	Justification (why there is no reasonable alternative and why has the preferred policy been selected?)
Policy 1: Presumption in Favour of Sustainable Development	Alternative approach would be no policy.	Without a strategic policy on sustainable development there is no overarching policy which makes it clear how this will be achieved in accordance with the NPPF. Therefore 'no policy' is not under active consideration by the planning team.
Policy 2: Scale of Growth	An alternative scale of growth has been identified and assessed, as described in Section 6.4 above.	<p>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 exemplar design, protecting and enhancing the character of local areas, providing new and improved green spaces and public realm, responding to the climate emergency, improving air quality 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.</p> <p>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, with increases near the SAC falling below the de minimis level. Redevelopment of fewer sites which are currently in high-trip generating uses could give Option 2 a less favourable air quality outcome.</p> <p>Option 1 locates more new homes in areas of medium and high flood risk. However, this is considered to be justified by the significant positive effect with regards to SA1, and the policies with the Local</p>

		Plan (Policy 93) which will mitigate and minimise potential negative effects on flood risk from development and help to improve resilience to climate change.
Policy 3: Infrastructure for Growth	Alternative approach would be no policy.	There would be a risk that development opportunities that could assist with the delivery of infrastructure may be compromised or missed. Due to this risk, 'no policy' is not under active consideration by the planning team.
Policy 4: Location of Growth	Alternative spatial strategy options have been identified and assessed, as described in Sections 6.2 (strategic options) and 6.3 (preferred and alternative spatial options) above.	<p>The combined approach / New Spatial Strategy involves a dispersed pattern of growth in identified hubs, town centres and opportunity locations. This, alongside the large-scale regeneration opportunity presented in the south of the borough, forms the basis and rationale for distributing growth. This is presented against the existing (Core Strategy) spatial strategy, centring growth around four key 'Growth Areas'; Blackhorse Lane, Northern Olympic Fringe; Walthamstow Town Centre and Wood Street.</p> <p>There is no reasonable alternative as the approach which runs through the spatial policies 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 involve 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 linked by walking and cycling routes, improved public transport, with leisure and recreation provision and enhanced job opportunities for residents.</p>

Policy 5: Management of Growth	No reasonable alternatives.	The policy approach has been prepared to be consistent with and reflect national and regional policy.
Policy 6: Ensuring Good Growth	No reasonable alternative.	The policy approach has been prepared to be consistent with the London Plan.
Policy 7: Encouraging Mixed Use Development	No reasonable alternative.	The policy sets out considerations which should be made when mixed-use developments are proposed. To not consider these elements would be unreasonable and to the detriment of achieving vital and viable local centres, and the establishment of liveable neighbourhoods.
Policy 8: Character-Led Intensification	No reasonable alternative.	The Local Plan supports a character led approach to intensification, height and tall buildings It recognises that some sites or areas in the Borough are more appropriate for greater levels of intensification and height than others and sets out an approach to intensification that is derived from a reading of context and character and based on the categories of 'transformation', 'transition' and 'reinforcement'.
Policy 9: South Waltham Forest Policy 10: Central Waltham Forest Policy 11: North Waltham Forest	Alternative spatial strategy options have been identified and assessed, as described in Sections 6.2 (strategic options) and 6.3 (preferred and alternative spatial options) above.	As Policy 4, above.
Policy 12: Increasing Housing Supply	An alternative scale of growth has been identified and assessed, as described in Section 6.4 above	As Policy 2, above.

<p>Policy 13: Delivering Genuinely Affordable Housing</p>	<ul style="list-style-type: none"> Waltham Forest should introduce a higher than 35% affordable housing threshold for Fast Track Route applications. 	<p>The policy seeks to maximise affordable housing delivery through a 35% minimum target with an overarching 50% target. The Local Plan Viability Study concludes on affordable housing that the results of viability testing do not point to any particular level of affordable housing that most schemes can viably deliver. It is therefore recommended that the target in Policy 13, be retained and applied on a 'maximum reasonable proportion' basis taking site-specific circumstances into account.</p> <p>The alternative to the percentage of affordable housing threshold would not perform differently in the SA. It might perform slightly more strongly against the housing SA Objective (SA1) but the significance score would be the same as the chosen policy approach.</p>
<p>Policy 14: Affordable Housing</p>	<ul style="list-style-type: none"> Adjust the requirement to delivery more intermediate housing or more low cost rent housing 	<p>London Plan Policy H6 - Affordable housing tenure indicates that London boroughs should as a minimum apply a proportion of 30% of affordable housing to be low-cost rented homes, and 30% to be intermediate products meeting the definition of genuinely affordable. The basis for apportioning the remaining 40% of affordable housing entirely to low-cost rented tenure is that this group experiences the most severe housing need, and prioritising the delivery of low-cost rented homes will have the greatest benefit for residents of the borough.</p> <p>The alternative to the mix of housing would not perform differently in the SA. It might perform slightly more strongly against the housing SA Objective (SA1) but the significance score would be the same as the chosen policy approach.</p>
<p>Policy 15: Housing Size and Mix</p>	<ul style="list-style-type: none"> Set a requirement for a general housing size mix to comprise more dwellings of 4+ bedrooms to better match the identified need in the SHMA. 	<p>The preferred policy approach of setting a specific requirement for each tenure and to consider affordability when setting this proportion has resulted in splitting intermediate rent and intermediate ownership and allocating a greater proportion of 3+ beds allocated to rent.</p>

		The alternative to the housing size mix would not perform differently in the SA. It might perform slightly more strongly against the housing SA Objective (SA1) but the significance score would be the same as the chosen policy approach.
Policy 16: Access and Adaptable Housing	No reasonable alternative	Requirement to meet soundness, legal conformity and to align with National guidance and the London Plan.
Policy 17: Redevelopment of existing housing and estate regeneration	No reasonable alternative	The Council will not support a reduction in the level of affordable housing.
Policy 18: Other forms of Housing	No reasonable alternative.	Support for delivering other forms of housing in areas which do not have good public transport accessibility will conflict with car-free development.
Policy 19: Small sites	No reasonable alternative	Support for residential intensification in areas which do not have good public transport accessibility will conflict with car-free development.
Policy 20: Housing in Multiple Occupation (HMOs) and Conversions	<ul style="list-style-type: none"> Continue to protect family homes from conversions to flats across all previous 'restricted dwelling conversion' wards (Policy DM6). Allow conversion of family homes to flats to increase overall supply of housing in Waltham Forest 	The policy approach taken forward has been to introduce provision for conversions where there is no-overconcentration, and they will meet minimum size threshold for family housing. This allows for this form of housing to make a contribution to better meeting the boroughs overall housing need in a way that minimises potential for harm.
Policy 22: Supported and Specialist Accommodation	No reasonable alternative.	The Council considers that it is not justified to permit a loss of accommodation, given the demonstrated need for facilities.

Policy 23: Gypsies, Travellers and Travelling Show people	No reasonable alternative.	The GTAA concludes that there is ample undeveloped land to allow for the intensification of both sites to meet their needs over the plan period. The borough does not have any significant plots of land which are not designated green space which are undeveloped and suitable alternative locations for sites.
Policy 24: Community-Led, Self-Build and Custom Build Housing	No policy, as community-led, self-build and custom build housing does not address a specified aspect of the borough's housing need.	<p>The policy approach taken forward aims to support self-build in principle indicating the Council's support for diversifying the sources of housing supply.</p> <p>The alternative of no policy would not perform significantly differently in the SA. The only SA Objective it might affect would be SA1 (housing). The assessment of the policy identifies one potential significant effect against SA1. Not having this policy would not result in a neutral effect against SA1 and would not result in any potential negative effects.</p>
Policy 25: Supporting and Boosting Economic Growth and Local Job Creation	No reasonable alternatives	The Council is seeking to meet the identified need for employment floorspace of varying types as outlined in the Employment Land Study (2019), and will not support the overall loss of floorspace in line with the London Plan.
Policy 26: Safeguarding and Managing Strategic Industrial Locations (SIL)	No reasonable alternatives	Suitable uses and strategic industrial capacity are set by London Plan.
Policy 27: Safeguarding and Managing Locally Significant Industrial Sites (LSIS)	No reasonable alternatives	Suitable uses and strategic industrial capacity are set by London Plan.
Policy 28: Safeguarding and Managing Borough Employment Areas	<ul style="list-style-type: none"> Remove the BEA designation (de-designate sites proposed as BEA). 	The approach taken by the Council is to retain the BEA designation to provide protection for locations which are significant agglomerations of office and research uses. Sufficient flexibility for change exists through permitted development rights.

		The alternative to this policy could perform less positively with regards to SA Objective 19 (economy and employment space in appropriate places) and could result in a significant negative effect. This would need to be mitigated through policies which directed employment developments to appropriate places. The alternative could result in a minor positive effect against SA1 (housing) as de-designating BEA could unlock some sites for housing development, if they were suitable locations with regards to the spatial strategy.
Policy 29: Approach to Non-Designated Employment Land	No reasonable alternatives	The approach taken by the Council is to protect non-designated industrial land ensuring re-provision of capacity. Policy 29 is designed to ensure that viable industrial sites are given effective protection. The Employment Land Audit concluded that many SMEs rely on secondary employment space, often of a more affordable nature, close to town centres with good public transport links.
Policy 30: Industrial Masterplan Approach	No reasonable alternatives	Process is elaborated in The London Plan, and approach explained further in the Local Plan.
Policy 31: Co-location Design Principles	No reasonable alternatives	Colocation needs adequate consideration of design mitigations for development to be acceptable.
Policy 32: Workspaces	No reasonable alternatives	The policy outlines the locations which are considered appropriate for workspace development, and requirements which will ensure that the space provided is suitable.
Policy 33: Affordable Workspaces	No reasonable alternatives	Proposals which trigger an affordable workspace requirement will be asked to submit an Affordable Workspace Statement to define their proposal which will be considered. This approach reflects the evidence which demonstrates that the delivery of affordable workspace varies in its viability, on a case-by-case basis.

Policy 34: Local Job, Skills, Training and Procurement	No reasonable alternatives	The policy approach chosen seeks to provide employment and economic benefits for local residents and businesses via s106, to mitigate for the impact of development on employment opportunities.
Policy 35: Railway Arches	No reasonable alternatives	The policy approach is to make best use of underutilised space to deliver flexible employment space options in the borough where possible.
Policy 36: Promoting Culture and Creativity	No reasonable alternatives	<p>The policy protects, promotes and encourages Arts, culture, creativity and entertainment as part of the place making process and local identity in Waltham Forest.</p> <p>It directs major development of arts, culture, entertainment and visitor facilities towards town centres and locations accessible by public transport.</p>
Policy 37: Protecting Public Houses (Pubs)	No reasonable alternative	There are no reasonable alternatives to the policy. The 2019 Pubs Cultural Report, part of The Mayor of London's Cultural Infrastructure Plan, and the borough's Cultural Infrastructure Study (2020) registered that over recent years local pubs across London and the borough have been lost. This policy therefore seeks to protect those pubs that exist and also allow for new ones in town centres and other accessible locations, particularly where they provide wider community facilitates and employment.
Policy 38: Blackhorse Lane Creative Enterprise Zone	Do not develop creative enterprise zone.	Blackhorse Lane is home to many of the boroughs creative and cultural industries. It is not only the spaces and businesses located in Blackhorse that make it an important area but how this has turned into an ecosystem with important supply chains across the area. It is because of the ecosystem that the Council has selected it to be a Creative Enterprise Zone in line with London Plan (2019) Policy HC5 'Supporting London's culture and creative industries', criteria B and C, and using the Mayor's self-accreditation scheme.

		<p>The alternative not to develop a creative enterprise zone and not to have this policy in the plan would not result in any potential significant positive or negative effects. The result would be an absence of the potential significant positive effects against SA16 (local distinctiveness), SA18 (town centres) and SA19 (economy and employment space in appropriate places) identified in the SA of this policy.</p>
<p>Policy 39: Hierarchy of Centres</p>	<p>Lock hierarchy of centres by restricting Town Centre uses outside of the designated town centre areas on applications are seeking to switch between town centre use classes – For example: Class E(a)(b) Retail to Sui Generis (drinking establishment with expanded food provision) would not be permitted BUT Class E(a)(b) or Sui Generis (fuel station) to Class C3 (residential dwellinghouses) would be permitted.</p> <p>Have a Hierarchy of Centres so growth can be apportioned appropriately to the Major Centre, District Centre, Neighbourhood centres and Local Parades</p> <p>De-restrict distribution of Town Centre uses to allow town centre uses to locate anywhere in the borough.</p>	<p>The Hierarchy of Centres categorises the centres in the borough so growth can be appropriately apportioned to them in a sustainable manner.</p> <p>If the centres were not set out in this hierarchy, there would be risk that the smaller centres could expand, detracting growth away from the established centres.</p> <p>By not providing this hierarchy, growth of retail, office and leisure developments could come forward outside of designated centres causing them to grow outside of their boundaries. This is an undesirable result as the demand for physical retail premises is shrinking due to the prevalence of online shopping and overgrown centres could lead to a rise in vacant premises.</p> <p>However, if the policy is too restrictive, it could prevent town centre uses coming forward at large new developments.</p> <p>When the strategic growth options were assessed in 2017, a developer led strategy was assessed alongside other options, including development focussed on town centres. Potential significant negative effects were identified in relation to SA4 (community cohesion and access to community facilities), SA5 (sustainable transport access), SA9 (Air Quality) and SA14 (integrity of SSSI and Natura sites) for the developer led option. No potential</p>

		<p>significant negative effects were identified for the Town Centres option. The assessment of the latter identified a potential significant positive effect in relation to improving the vitality and viability of town centres, uncertain effects in relation to SA14 due to the proximity of Wood Street town centre to Epping Forest SSSI and SAC site and uncertain effects in relation to SA3 (health), SA7 (greenhouse gas emissions), and SA8 (energy conservation). The Town Centres strategy option was considered to perform better than the developer-led strategy option.</p>
<p>Policy 40: New Retail, Office and Leisure Developments</p>	<ul style="list-style-type: none"> Remove the requirements in part B to allow unrestricted growth outside of centre locations by removing the need to demonstrate that it has met any of the requirements set out. 	<p>The policy that is taken forward in LP1 is to restrict growth to designated town centre locations only.</p> <p>This policy ensures that town centre uses of the designated centre locations come forward at a scale appropriate to the role and function of the particular centre or parade and that these locations are considered before out of centre locations.</p> <p>Also see Policy 39: Hierarchy of Centres row for justification.</p>
<p>Policy 41: Revitalisation, Adaptation and Regeneration in Designated Centres and Parades</p>	<p>Restricting proposals that involve revitalisation, adaption, and regeneration of the borough's designated centres and retail parades only – to focus the investment to within the designated boundary.</p> <p>Encourages proposals that involving the revitalisation, adaptation and regeneration of the borough's designated centres/retail parades and other non-designated areas will be encouraged where they seek to achieve the set planning objectives.</p>	<p>This policy robustly supports the concentration of activity into the designated centres and parades. By adopting this approach, a concentrated town centre can enjoy the benefits of sustainable growth that recognises the changing role that High Streets play (i.e. moving away from a physical retail premises to a more online presence).</p> <p>The Council, in the past, has allowed the Town Centres in the borough to grow outside of their boundaries which has led to some of them developing in a “ribbon” formation, rather than compacted into a single centre – and in some instances new clusters of retail led development have formed outside of the designated centres creating new centres. The policy helps to re-concentrate town centres, thus</p>

	<p>To permit proposals which revitalise, adapt and regenerate the boroughs non-designated area. This could be an important consideration for new and emerging centres.</p>	<p>revitalise and regenerate them. This serves another purpose, to free up space outside of designated centres that is being used for town centre uses for developing new residential dwellings.</p> <p>This policy also helps to encourage retail businesses to consider locations within the designated centres first rather than non-designated to ensure the long-term vitality of their operations.</p> <p>This policy helps to prevent our designated centres from sprawling outside of their boundaries which leads to vacant buildings in our designated centres. It also helps to keep our designated town centres distinctive and viable.</p> <p>Also see Policy 39: Hierarchy of Centres row for justification.</p>
<p>Policy 42: Managing Changes of Use in and outside Primary Shopping Areas (merged former policies 42 and 43)</p>	<p>Encouraging Town Centre and other uses inside and outside of the primary shopping areas</p>	<p>This policy helps to direct development for primary town centre uses into the designated town centres in-order to prevent sprawl. It also supports development which maintains the continuity of active frontage that contributes to the vitality and viability of the town centre.</p> <p>Not having this policy would lead to change of uses in primary town centres that do not have active frontages or contribute to the vitality and viability of the town centre. This will encourage mixed-use development with active frontages to come forward outside of town centres which will decline as a result.</p> <p>It is important that the centres are kept as compact as possible as they contribute not only to the vitality and viability of the borough but their location also helps the borough to deliver its 15 minute neighbourhoods which reduce car dependency and improves the health of our residents.</p> <p>Also see Policy 39: Hierarchy of Centres row for justification.</p>

<p>Policy 44: Managing Changes of Use in Neighbourhood Centres and Local Retail Parades</p>	<p>No reasonable alternatives.</p>	<p>This policy encourages town centre uses and active frontages at ground floor level that contribute to the viability and vitality of neighbourhood centres and retail parades that sit Outside Primary Shopping Areas of Designated Centres.</p> <p>If this policy was not in place, these local centres which contribute strongly towards the borough being able to offer most essential goods and services 5 minutes from residents homes could be threatened by change of use proposals.</p>
<p>Policy 45: Managing Changes of Use in Non-Designated Areas</p>	<p>No reasonable alternatives</p>	<p>The policy supports the strategic objective of containing town centre uses within the designated centres.</p>
<p>Policy 46: Evening and Night-time Economy Uses</p>	<p>No reasonable alternatives.</p>	<p>This policy supports development of the evening and night-time economy especially in Walthamstow Town Centre. The reasons for this are threefold;</p> <ul style="list-style-type: none"> • It keeps the borough's main designated centre active for a longer period of the day with late-night opening therefore attracting more people and diverse spending patterns. • It condenses evening activity to a single area where increased noise levels arising from these uses are considered to be generally more acceptable. (i.e. away from residential areas). It enables greater safety and security as more there is a higher throughflow of people in the centre at this time of day. • It concentrates evening activities into one place that is best served by public transport at closing time. This approach also helps to mitigate night-time and evening noise to specific parts of the borough..
<p>Policy 47: Shopfronts and Signage</p>	<p>No reasonable alternatives.</p>	<p>It is important that applications for new shopfronts in terms of design and signage are appropriate to the context of the building they are being proposed for.</p>

		The policy supports improvements to shopfronts that are in keeping and in scale with the other aspects of their setting.
Policy 48: Social and Community Infrastructure	No reasonable alternatives	This approach has been taken as the borough will have an increased requirement for social and community infrastructure as the population uplift resulting from the growth forecasted in the Local Plan Period.
Policy 49: Education and Childcare Facilities	No reasonable alternatives	This approach has been taken as the borough will have an increased demand for education and childcare facilities as a result of the population uplift from the growth forecasted in the Local Plan period.
Policy 50: Promoting Healthy Communities	No reasonable alternatives	The approach ensures that we continue to strive towards improving the health of the residents in our borough to improve wellbeing and life expectancy and to reduce burden on primary healthcare providers.
Policy 51: Health Impact Assessments	No requirement for HIA.	<p>The approach ensures continued improvement to health resulting from development, acknowledging the need to consider the upstream determinants of health outcomes.</p> <p>In the London Borough of Waltham Forest, a borough wide Air Quality Management Area (AQMA) has been declared and HIA policy directly supports air quality improvements in the Borough.</p> <p>This policy also considers the health implications raised by Hot food Takeaways, Betting shops and Pay Day Loan Shops. London Plan Policy GG3 Creating a healthy city recommends using HIAs in order to mitigate any potential negative impacts and maximise potential positive impacts of new development.</p>

Policy 53: Noise, Vibration and Light Pollution	No reasonable alternatives	The Health Impact Assessments are required to assess the impact of development in the borough that is considered to have a negative impact on the health of the residents of the borough.
Policy 54: Hot Food and Takeaways	No reasonable alternative	<p>The policy restricts the number of Hot food takeaways within designated centres or parades where this would harm the character and vitality and shopping function of a town centre.</p> <p>This approach is taken to tackle the rise of obesity in school children in the borough.</p>
Policy 55: Betting Shops and Payday Loan Shops	No reasonable alternative	<p>The policy restricts and controls proposals for new betting shops or payday loan shops based on its catchment area and proximity to areas of deprivation</p> <p>It limits the number of betting shops and pay-day loan shops that can be grouped together in one place.</p> <p>This approach has been taken as there is a direct link to physical health and financial circumstance. Payday loan shops lend money often at higher rates of interest than banks forcing people that have taken such products out to compromise on their health in terms of diet and exercise.</p>
Policy 56: Delivering High Quality Design	No reasonable alternatives	High Quality Design is a key focus to ensure that the projected growth that comes forward is of the best possible quality. This was the only approach considered, and is supported by national guidance.

<p>Policy 57: Tall Buildings</p>	<ul style="list-style-type: none"> • Restrict building heights in the borough and deliver at lower density, although this have implications on meeting growth targets. • Relax conditions of policy tests to enable taller and tall buildings to be delivered outside of key growth areas – although this could have impact on other sensitivities within the borough. 	<p>The chosen policy is to support the development of Taller and Tall Buildings in Growth Areas Subject to Policy Tests.</p> <p>The alternative to restrict building heights in the borough could perform more positively than the chosen policy in respect of SA Objectives relating to heritage (SA17), local distinctiveness (SA16), and would pose less risks to birds in relation to SA13 (biodiversity) and SA14 (nature conservation sites). However, it would perform less positively in relation to SA12 (efficient use of land and resources), SA18 (town centres) and SA19 (economy and employment space in appropriate places).</p> <p>The alternative to relax conditions of policy tests to enable taller and tall buildings in places outside of key growth areas could result in potential significant effects against SA17 (heritage), SA16 (local distinctiveness), and SA13 (biodiversity) and SA14 (nature conservation sites). The alternative could result in minor positive effects in relation to SA18 (town centres) and SA19 (economy and employment space in appropriate places).</p>
<p>Policy XX: Building Heights</p>	<p>No reasonable alternatives.</p>	<p>The final approach will align with the outcome of the ongoing engagement with the GLA and subsequent final Statement of Common Ground between the two competent authorities. Issues of height and scale with regard to impact on the local and historic context set as set out in Historic England Advice Note 4 and other relevant guidance. Visual, environmental, functional and cumulative impacts considered at the application, Building heights and their definitions established and their response to the surrounding character agreed.</p>
<p>Policy 58: Residential Space Standards</p>	<ul style="list-style-type: none"> • Establish space standards which exceed the minimum size which is set out in Nationally Described Space Standards that align with the London Plan and National Guidance. 	<p>The chosen policy adheres to Nationally Described Space Standards that align with the London Plan and National Guidance.</p> <p>The alternative to exceed the minimum size which is set out in Nationally Described Space Standards would not result in any</p>

		potential significant positive or negative effects in the SA. It could perform slightly more strongly than the chosen policy with regards to SA3 (health) and slightly less strongly against SA1 (housing) due to development viability and deliverability but the overall significance scores and potential effects against these SA Objectives would be the same as the chosen policy.
Policy 59: Residential Amenity	<ul style="list-style-type: none"> Establish an amenity space requirement which is aligned to the London Plan although this will have more impact on delivering against health objectives. 	<p>The London Plan Standard is 5sqm of private space.</p> <p>Waltham Forest Residential Amenity Space as set by the Local Plan is the provision of a minimum of 10sqm for one and two bedroom flats. This more generous standard considers the context of LBWF as an outer London Borough.</p> <p>The alternative to adhere to the London Plan standard amenity space would not result in any potential significant positive or negative effects in the SA. It could perform slightly less strongly than the chosen policy, the assessment of which identified potential minor positive effects in relation to with regards to SA2 (crime), SA3 (health), SA6 (waste), SA9 (air quality) and SA16 (local distinctiveness). However, the alternative would still support the achievement of those objectives and the overall significance scores and potential effects against these SA Objectives would be the same as the chosen policy.</p>
Policy 60: Designing Out Crime	No reasonable alternatives	Requirement to meet soundness, legal conformity and to align with National guidance and support from the Metropolitan Police
Policy 61: Advertisements, Hoardings and Signage	No reasonable alternatives	Requirement to meet soundness, legal conformity and to align with National guidance and the London Plan.
Policy 62: Promoting Sustainable Transport	No reasonable alternatives	This approach aligns with London Plan and National Policy. The Local Plan must support development and encourage infrastructure that reduces dependence on car use

Policy 63: Active Travel	No reasonable alternatives	This approach has been chosen to align with London Plan and National Policy the Local Plan must support development and encourage infrastructure that reduces dependence on car use.
Policy 64: Public Transport	No reasonable alternatives	<p>Achieving modal shift is key to unlocking other strategic objectives in the plan such as;</p> <ul style="list-style-type: none"> a) Improved health of our residents b) Delivery of our 15-Minute Neighbourhoods. c) Better Air Quality, d) Delivery against Climate Emergency Objectives. e) Decreased pressures on the Epping Forest SAC. f) Delivery of our 15-Minute Neighbourhoods. <p>This approach aligns with London Plan and National Policy the Local Plan must support development and encourage infrastructure that reduces dependence on car use.</p>
Policy 65: Development and Transport Impacts	No reasonable alternatives	This approach was chosen to reduce the impact on the Borough of the development to be brought forward in the Local Plan at both construction and operational stages.
Policy 66: Deliveries, Freight and Servicing	No reasonable alternatives	This option was chosen to reduce the impact that deliveries have on the borough in terms of trips made by less sustainable transport modes and air quality impact mitigation.
Policy 67: Construction Logistics Plans (CLPs)	No reasonable alternatives	This option was chosen to reduce the impact that development in the borough has in terms of trips made by less sustainable transport modes and air quality impact mitigation

Policy 68: Managing Vehicle Traffic	No reasonable alternatives	The selected option was chosen to increase modal shift towards more sustainable transport options and to help deliver 15 minute neighbourhood objectives.
Policy 69: Electric Vehicles	No reasonable alternatives	This option was chosen as the sale of new cars fitted with internal combustion engines are due to be phased out in 2030 and 2035 for hybrids with an element of internal combustion in their drivetrain.
Policy 70: Utilities Infrastructure	No reasonable alternatives	This option was chosen to make sure that development in the borough that comes forward in the Local Plan period has adequate utilities infrastructure provided from the outset.
Policy 71: Digital Infrastructure	No reasonable alternatives	<p>Will grant planning applications at major new developments that deliver fast broadband and relevant connections and electronic communications infrastructure.</p> <p>This option was chosen to ensure adequate connectivity to digital infrastructure is available to all residents as the borough grows. Download speeds might need to be assessed and reviewed. This will enable more residents to have WFH capabilities in their homes so help to contribute to the vitality and viability of the borough and help to deliver 15 minute neighbourhood objectives.</p>
Policy 72: Designated Heritage Assets	No reasonable alternatives	<p>The requirement to meet soundness, legal conformity and to align with national guidance. The way this policy has been prepared is aligned to the requirements of the NPPF.</p> <p>The level of growth set out by this Local Plan will have an impact on the historic landscape of Waltham Forest. This is mitigated by the selection of sites that are due to come forward with LP2 our Site Allocation Document as due to the urban context of the borough, all of the development that comes forward will be focused on brownfield sites. It is important that development balances the delivery of growth</p>

		<p>and the need to protect the historic environment to preserve the character of the borough for future generations to enjoy.</p> <p>The council has been committed to updating its evidence base for its heritage assets. There have been ongoing review and update of the conservation areas appraisals and maintaining of the Local List in the borough. The largest piece of work commissioned was during the drafting of the Local Plan was an update to its Archaeological Priority Areas Appraisal (APAs). This work has led to some of the boundaries for these areas being redrawn, meaning that planning application that come forward on a site designated within an APA, then this will be a material consideration at a planning decision.</p> <p>As this section of the plan is required to align with the position set out the current NPPF and have general conformity with the Adopted London Plan, The Council could not adopted “no change to the current position” stance in drafting the policy as the requirements had moved on from when the Core Strategy was Adopted.</p> <p>To further support robust decision making of planning applications that impact the heritage assets in the borough the council is preparing a revised Local List (Detailing Locally Listed Heritage Assets in the Borough) and a Heritage SPD which addresses the borough's built heritage and provide advice on the conservation, preservation and enhancement of the historic environment. To help people understand heritage matters in the context of the planning system and include important links to the Local Plan’s Character Led Intensification approach.</p> <p>Due to the high levels of growth that the borough requires, mixed-use development will come forward predominately on both former industrial sites and in Town Centre locations and the addressing impact of development on heritage assets that this development would bring would be mitigated by the planning application. There are</p>
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		some sites that are outside of these designations, the impact of which would have to be decided at application level.
Policy 73: Listed Buildings	No reasonable alternatives	Requirement to meet soundness, legal conformity and to align with national guidance.
Policy 74: Conservation Areas	No reasonable alternatives	Requirement to meet soundness, legal conformity and to align with national guidance.
Policy 75: Archaeological Assets and Archaeological Priority Zones	No reasonable alternatives	Requirement to meet soundness, legal conformity and to align with national guidance.
Policy 76: Non-Designated Heritage Assets	No reasonable alternatives	Requirement to meet soundness, legal conformity and to align with National guidance.
Policy 77: Locally Listed Heritage Assets	No reasonable alternatives	<p>There is no statutory requirement to have a local list of heritage assets, so an alternative option would be to remove the policy altogether.</p> <p>The Council recognises the important role that historic buildings play in placemaking and is committed to refreshing the Locally Listed Buildings register to help make more robust planning decisions on applications which may affect them.</p> <p>To further support robust decision making of planning applications that impact the heritage assets in the borough the council is preparing a revised Local List (Detailing Locally Listed Heritage Assets in the Borough). This will help to ensure an adequate level of protection to the Locally Listed buildings in the borough which are not afforded the benefit of National Protection.</p>
Policy 78: Highams Area of Special Character	<ul style="list-style-type: none"> • Upgrade the Highams Area of Special Character into a recognised conservation area • De-designate the Highams Area of Special Character. 	This policy is designed to protect the general character of historically significant part of the borough which is not of sufficient interest to be designated with the full protection that comes with the conservation area. Much of the special Area of character falls within development in the grounds of The Highams Park which was landscaped by Humphrey Repton.

Policy 79: Green Infrastructure and the Natural Environment	No reasonable alternatives	There is a requirement for major planning applications to provide Sustainable Alternative Natural Green Spaces (SANGS). This will be delivered in the form of traditional SANGS which are large sites that perform the full function of a SANG (Increased Biodiversity Uplift, Better Signage and Interpretation and the provision of circular walks) and supported by a network of Green Infrastructure Sites that link the SANGS sites together and provide partial SANGS Functions.
Policy 80: Open Spaces, Sport and Recreation	No reasonable alternatives	Requirement to meet soundness, legal conformity and to align with national guidance.
Policy 81: Biodiversity and Geodiversity	No reasonable alternatives	Requirement to meet soundness, legal conformity and to align with national guidance.
Policy 82: Trees	No reasonable alternatives	Requirement to meet soundness, legal conformity and to align with national guidance.
Policy 83: The Epping Forest and the Epping Forest Special Area of Conservation	No reasonable alternatives	Due to the entirety of the borough sitting within the 6.2km Zone of Influence (ZOI) for the Epping Forest Special Area of Conservation (SAC), The Council is obligated to work in cooperation with the City of London (Conservators of Epping Forest) Natural England and the following neighbouring Local Plan authorities and organisations: <ul style="list-style-type: none"> • Epping Forest District Council • The London Borough of Redbridge • The London Borough of Enfield • The London Borough of Haringey • The London Borough of Hackney • The London Borough of Newham • The Lee Valley Regional Park Authority

		<ul style="list-style-type: none"> • The London Legacy Development Corporation (Until it is dissolved in 2024) <p>to jointly develop strategies designed to protect the Epping Forest Special Area of Conservation from adverse impacts arising from increased recreational pressure from visitors. Recognising that the pressures on Epping Forest will be continual – the authorities will also jointly agree on a Strategic Access and Monitoring Strategy (SAMMS) mitigation package which will be paid directly to the conservators to be spent against a manifest of a pre-agreed works programme.</p> <p>The approach agreed for this policy ensures that all new development within 6km of the SAC will be required to demonstrate that measures are put in place to mitigate against air quality and recreational impacts by;</p> <ol style="list-style-type: none"> i) Providing maximum ecological benefit on site ii) Contribute to SAMMS payments. iii) Deliver SANGS iv) Be sensitive and proportionate where they effect SAC and deliver enhancements and not contribute to adverse impacts on integrity, amenity or visitor enjoyment v) Project level HRA's must be completed for all development within 500m of the SAC boundary <p>This option has been evidenced by the Habitats and regulations assessment (HRA) (April 2021). This document states that the Plan would likely have a “significant effect” in respect of atmospheric pollution and disturbance from recreation, which will have an adverse effect on the integrity of the SAC. Projects arising from these pathways is dependent on a number of mitigation measures, 5</p>
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		<p>including the Strategic Monitoring and Management Strategy (SAMMs) (which Natural England have reduced the threshold number of dwellings from 100 > 1 unit), the Suitable Alternative Natural Greenspace Strategy (SANGS Strategy) (which would require major development to deliver bespoke on-site or offsite SANGS) and the Air Quality Mitigation Strategy (AQMS) which initially identified that the plan would not result in adverse effects on the integrity of the SAC, however, it was identified by Natural England that significant changes to the technical data and inputs would be required in order for the study to conclude this and that this would need to be available in advance of any further hearing sessions. This strategy also relies on a 30% reduction in petrol / diesel vehicle trips.</p> <p>In summary, the option that will be chosen as the final approach will be dependent on the outcome of an updated HRA comprising of updated SANGS an AQMS that will be in full compliance with the habitats regulations and viewed and commented on by interested parties ahead of a further series of hearing sessions.</p> <p>There were no alternative options considered as this approach is the result of long-term negotiations and working in cooperation to develop this policy with neighbouring authorities, Natural England, The City of London Conservators of Epping Forest and the Lee Valley Regional Park Authority to mitigate recreational and air quality impacts in the Epping Forest SAC. Departing from this collaborative approach would risk undermining the terms of what has been agreed at strategic level as part of a cross-boundary approach.</p>
Policy 84: Lee Valley Regional Park	No reasonable alternatives	The Local Plan aligns with the Lee Valley Development Framework and the council continue to work in cooperation with the Lee Valley Regional Park Authority on development matters on the shared boundary.

Policy 85: Protecting and Enhancing Waterways and River Corridors	No reasonable alternatives	Requirement to meet soundness, legal conformity and to align with national guidance.
Policy 86: Food Growing and Allotments	No reasonable alternatives	The 2020 update to the Biodiversity Action Plan (BAP) indicates that the borough has 34 allotment sites that provide important food growing space and habitats for pollinators but also may be home to a range of wildlife, with habitats of rough grass, and trees and shrubs on the boundaries.
Policy 87: A Zero Carbon Borough	No reasonable alternatives	Supported by national guidance. The Council Declared a Climate Emergency in 2019, This declaration committed the Local Plan to play its part in addressing the climate emergency.
Policy 88: Decentralised Energy	No reasonable alternatives	Supported by national guidance.
Policy 89: Sustainable Design and Construction	No reasonable alternatives	Supported by national guidance.
Policy 90: Air Pollution	No reasonable alternatives	Supported by national guidance.
Policy 91: Water Quality and Water Resources	No reasonable alternatives	Supported by national guidance.
Policy 92: Contaminated Land	No reasonable alternatives	Supported by national guidance.
Policy 93: Managing Flood Risk	No reasonable alternatives	Supported by national guidance. The Local Plan is supported by the Strategic Flood Risk Assessment (SFRA Level I&II) which assesses the flood risk in the borough over the Local Plan period to enable mitigation measures to be implemented to prevent flooding.
Policy 94: Overheating	No reasonable alternatives	Supported by national guidance.
Policy 95: Waste Management	No reasonable alternatives	Policy needs to meet the requirements of the North London Waste Plan and approach is supported by national guidance.

<p>Policy 96: Infrastructure and Developer Contributions</p>	<p>No reasonable alternatives</p>	<p>This is required to deliver key infrastructure that supports the growth aspirations in the Local Plan.</p>
<p>Policy 97: Monitoring and Promoting the Achievement of Growth Targets</p>	<p>No reasonable alternatives</p>	<p>Monitoring key targets for growth (housing, including affordable housing, employment space and retail) annually as part of the Council Authority Monitoring Report is critical to ensuring the plan is working as intended.</p>