



London Borough of Waltham Forest Local Plan Sustainability Appraisal

Appraisal of the 'Direction of Travel' Document

Annexes

London Borough of Waltham Forest Local Plan Sustainability Appraisal

A report by **CAG Consultants**

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To contact CAG Consultants:

CAG CONSULTANTS

150 Minories

London EC3N 1LS

Tel 020 8555 6126

Fax 020 7900 1868

hq@cagconsult.co.uk

www.cagconsultants.co.uk

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Annex B

1.1 Detailed Appraisal Tables for the Strategic Growth Options Appraisals

The following tables B.1 to B.6 present the detailed appraisals of the six strategic growth options.

Significance has been determined with reference to the following definitions:

Symbol	Definitions of Significance of Effects Against the SA Objectives
++	The option supports the achievement of this objective; it addresses all relevant sustainability issues and could result in a potentially significant beneficial effect e.g. improved access by walking and cycling modes to a local or town centre
+	The option supports the achievement of this objective; it addresses some relevant sustainability issues, although it may have only a minor beneficial effect
0	The option has no impact or effect and is neutral insofar as the benefits and drawbacks appear equal and neither is considered significant
?	Uncertain or insufficient information on which to determine the appraisal at this stage
-	The option appears to conflict with the achievement of this objective; it does not address relevant sustainability issues and may result in minor adverse effects
--	The option works against the achievement of this objective; it could exacerbate relevant sustainability issues and may result in a potentially significant adverse effect e.g. loss of all or part of a designated ecological site of national importance

Growth Option 1 - Developer Led

Option wording:

“Growth would be delivered by landowners and property developers through the submission of planning applications to the Council. The timing and location of new development would be up to the landowners and property developers, leaving us the ability only to react to planning applications.

Development occurring on a number of dispersed sites may be difficult to coordinate strategically; we would only have influence on development once a planning application has been submitted. Each planning application would be considered on its merits, including development proposals on land under policy protection, for example Green Belt, Metropolitan Open Land (MOL) and Strategic Industrial Land (SIL).”

Assumptions:

- Development could be located anywhere in the borough.
- Further assessment of impacts would occur at project level.

SA Objective	Significance	Direct/ Indirect/ Cumulative	Duration (short, med, long term)	Permanent/ Temporary Irreversible/ Reversible	Magnitude / Spatial Extent	Commentary
1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	-	Direct	Long	Permanent	Local	Housing may be provided relatively quickly as there will be few limitations on location. However, a lack of strategic approach is likely to lead to development in locations with most profit, which is unlikely to provide a range of sizes and tenures throughout the borough.
2. Reduce crime and the fear of crime	-	Indirect	Medium	Temporary	Local	A developer-led approach is likely to lead to development in locations with most profit, which is unlikely to be those with higher crime rates, and consequently investment is less likely to occur in these areas.
3. Improve standard of health and wellbeing of those who live and work in the Borough	-	Indirect	Medium	Temporary	Local	A developer-led approach will entail optimising land use and access according to the demands of individual projects. This is likely to

Table B.1: Assessment of Strategic Growth Option 1: Developer Led

SA Objective	Significance	Direct/ Indirect/ Cumulative	Duration (short, med, long term)	Permanent/ Temporary Irreversible/ Reversible	Magnitude / Spatial Extent	Commentary
						produce a piecemeal development pattern which may fail to provide sufficient strategic sustainable transport infrastructure and green infrastructure which can be used for recreation and active travel. This could have an indirect negative impact on health and wellbeing. There could also be health and wellbeing implications from negative air quality arising from a lack of sustainable transport and green infrastructure.
4. Improve community cohesion and reduce inequalities through the provision of community facilities to meet local cultural, educational, recreational and social needs	--	Direct	Long	Permanent	Local	<p>A developer -led approach may lead to developments that are too small to support new social infrastructure through S106 processes, and located in areas with the least deprivation (developers likely to target opportunities in the highest existing value areas which will provide a high profit.)</p> <p>This approach may replicate existing spatial patterns that have failed to sufficiently address deprivation. There are notable socio- spatial differences between North and South of the Borough and a spatial and strategic approach to community cohesion is likely to be most beneficial. However, this option will not facilitate this.</p>
5. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system, reducing car use for all journey lengths.	--	Direct	Long	Permanent	Local	A developer-led approach will entail individual developers optimising land use and access according to the demands of individual projects. This is likely to produce a piecemeal development pattern. This is likely to fail to provide sufficient sustainable transport infrastructure as this is best delivered at a strategic scale.

Table B.1: Assessment of Strategic Growth Option 1: Developer Led

SA Objective	Significance	Direct/ Indirect/ Cumulative	Duration (short, med, long term)	Permanent/ Temporary/ Irreversible/ Reversible	Magnitude / Spatial Extent	Commentary
						Other spatial transport sustainability issues, such as uneven access to public transport and reliance on private cars are unlikely to be addressed in this option.
6. Prevent production of waste, improve resource efficiency and increase recycling and recovery	-	Indirect	Medium	Temporary	Regional	A developer-led approach is unlikely to provide the strategic approach needed to maximise possibilities for recycling, reduction of waste and other waste sustainability issues. Management of waste in the most environmentally friendly way, such as implementing the emerging London Circular Economy waste policy, would benefit from a strategic spatial approach.
7. Reduce greenhouse gas emissions and promote low carbon growth	-	Indirect	Medium	Temporary	Regional	Lack of strategic approach will curtail ability to reduce greenhouse gas emissions through directing development in sustainable locations, reducing car use and rationalising existing land uses. Possibilities for district heating and other developments larger than project-level will be more difficult to deliver. Not clear that this option will promote low carbon growth.
8. Conserve energy	+	Indirect	Medium	Temporary	Regional	A developer-led approach should support the delivery of new energy efficient buildings, and implementation of renewable and low or zero carbon technology at a project scale, in accordance with planning policy and building regulations. Due to a lack of strategic approach and risk of piecemeal development, this option is less likely to creation conditions required for shared energy systems.
9. Improve air quality	--	Cumulative impact from multiple projects of	Long Term	Permanent.	Local, Sub-Regional, Regional	Lack of strategic approach will curtail ability to address air quality impacts through directing development to sustainable locations, providing improved transport infrastructure,

Table B.1: Assessment of Strategic Growth Option 1: Developer Led

SA Objective	Significance	Direct/ Indirect/ Cumulative	Duration (short, med, long term)	Permanent/ Temporary Irreversible/ Reversible	Magnitude / Spatial Extent	Commentary
		varying kinds. Indirect impacts of built form on air quality.				and reducing car journeys and rationalising of existing land uses. The receptor is highly sensitive as all of Waltham Forest is an Air Quality Management Area (AQMA) and there is a need to improve the efficacy of measures within the AQMA. Air quality is a regionally significant issue in London.
10. Improve water quality in rivers and groundwater and ensure the efficient use of water resources	0	N/A	N/A	N/A	N/A	It is assumed that there would not be any particular impacts on this objective resulting from this option.
11. Reduce the risk of flooding and improve resilience to climate change	0	N/A	N/A	N/A	N/A	This option would locate new development in the most profitable areas, which would facilitate the provision of SUDS and other flood mitigation in new developments. These mitigation measures have a cost which could influence viability of development. A spatial approach to flood management, such as a flood avoidance zone, will not be possible, and the focus on developer-identified projects is unlikely to substantially address the need to improve flood resilience at existing properties. Overall with the information available at this stage benefits and drawbacks appear equal and neither is considered significant.
12. Ensure the efficient use of land and buildings and protect soil quality and geological resources	-	Direct	Long Term	Permanent	Local	A developer-led approach is likely to be piecemeal in terms of land use. While individual sites may be developed to high densities, the overall approach on a borough wide scale is unlikely to be efficient.

Table B.1: Assessment of Strategic Growth Option 1: Developer Led

SA Objective	Significance	Direct/ Indirect/ Cumulative	Duration (short, med, long term)	Permanent/ Temporary Irreversible/ Reversible	Magnitude / Spatial Extent	Commentary
13. Conserve and enhance biodiversity and the natural environment, improving resilience to climate change	-	Direct	Long Term	Permanent	Local	<p>Lack of strategic approach may lead to fragmentation of habitat, and piecemeal removal of green and blue infrastructure.</p> <p>There could be indirect negative impacts from reduced air quality through nitrogen deposition due to reduced potential to provide strategic sustainable transport investment.</p> <p>A strategic and spatial approach to green infrastructure may be more difficult to implement.</p>
14. Protect the ecological integrity of SSSI and Natura 2000 sites	--	Direct	Long Term	Permanent	National (Given protected status of sites.)	<p>Developer-led approach unlikely to provide strategic and larger scale opportunities to protect and enhance the wildlife and habitats in and near to Waltham Forest.</p> <p>There could be indirect negative impacts on ecological sites from reduced air quality through nitrogen deposition due to reduced ability to provide strategic sustainable transport investment.</p>
15. Maintain and enhance the quality of the green belt and open space areas	0	N/A	N/A	N/A	N/A	This option should not affect Green Belt of open space areas. Proposals which affect Green Belt or open space land would be dealt with on a case by case basis.
16. Maintain and improve local distinctiveness	-	Direct	Long Term	Temporary	Local	Lack of coordinated and strategic approach to local distinctiveness is unlikely to result in an improvement in areas where distinctiveness is lacking or has been adversely affected by previous development and activities.
17. Conserve and enhance the historic built environment	-	Indirect and cumulative	Long Term	Permanent	Local Effects, possibly	Lack of coordinated strategic approach could result in indirect negative impacts on historic built environment receptors. This is due to

Table B.1: Assessment of Strategic Growth Option 1: Developer Led

SA Objective	Significance	Direct/ Indirect/ Cumulative	Duration (short, med, long term)	Permanent/ Temporary Irreversible/ Reversible	Magnitude / Spatial Extent	Commentary
					regional if larger buildings	lack of strategic approach to development and in particular management of cumulative height and massing impacts of new development.
18. Maintain and enhance the vitality and viability of the Borough's town centres	-	Indirect	Medium Term	Temporary	Local	Without a coordinated spatial approach, development is unlikely to support and promote vitality in all of the Borough's town centres.
19. Improve the local economy by enabling employment developments in appropriate places	-	Direct	Medium Term	Permanent	Local	Appropriateness will be assessed on a project by project basis, not strategically. This will make it difficult to target most appropriate places for employment development.
20. Maintain stable levels of employment in the Borough	-	Direct	Medium Term	Permanent	Local	Developer-led approach unlikely to target areas with lower levels of economic activity and to provide most cumulative impacts (such as overlaps of employment and vitality of town centres).

Growth Option 2 - Key Growth Areas

Option wording:

“We would continue with our current Key Growth Areas and intensify development in them, and we could consider minor changes to the boundaries. The existing Local Plan identifies Blackhorse Lane, Northern Olympic Fringe (now referred to as Lea Bridge and Leyton), Walthamstow Town Centre and Wood Street. These four growth areas are located towards the centre and south of the Borough.

Although good progress has been made in implementing existing plan proposals for the Key Growth Areas, there are still outstanding proposals to be delivered. However, there is a finite land capacity. To accommodate the anticipated levels of growth, some new and existing development sites in Key Growth Areas may require greater intensification including delivering taller buildings.”

Assessment assumptions:

- Development will be intensified in the current Key Growth Areas, including possibly minor changes to the boundaries.
- Intensification including taller buildings.
- As the key growth areas are located in Centre and South of the Borough, this option limits future growth to those areas.
- Previous SAs on APPs for the Key Growth Areas were reviewed to identify any significant impacts at previous stages.

SA Objective	Significance	Direct/ Indirect/ Cumulative	Duration (short, med, long term)	Permanent/ Temporary Irreversible/ Reversible	Magnitude / Spatial Extent	Discussion of significant effects and relative merits more generally
1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	-	Direct	Long	Permanent	Local	Additional housing development will be focused in these areas and likely to be higher density/ taller buildings due to existing level of development in these areas. This is unlikely to provide a full range of tenures and sizes throughout the borough; what would be provided is likely to be in taller buildings and therefore not necessarily meeting the needs of families.
2. Reduce crime and the fear of crime	+	Indirect	Medium	Temporary	Local	Some of the Key Growth Areas, including particularly Walthamstow High Street and Lea Bridge, had consistently high crime rates in 2017 so further investment in these areas would have a positive impact on crime and fear of crime.

Table B.2: Assessment of Strategic Growth Option 2: Key Growth Areas

SA Objective	Significance	Direct/ Indirect/ Cumulative	Duration (short, med, long term)	Permanent/ Temporary Irreversible/ Reversible	Magnitude / Spatial Extent	Discussion of significant effects and relative merits more generally
3. Improve standard of health and wellbeing of those who live and work in the Borough	+	Indirect	Medium	Permanent	Local	<p>All the Key Growth Areas are in close proximity to open space (Black Horse Lane and Lea Bridge and Leyton are particularly close). There is the possibility of improving health and wellbeing by improving access to existing open spaces. Over-intensification or expansion of these areas into green space could have a negative impact on health and wellbeing.</p> <p>Overconcentration of employment use could have negative impacts for open space quality (due to over-use) and provision (due to land-take pressures) in these town centre areas.</p>
4. Improve community cohesion and reduce inequalities through the provision of community facilities to meet local cultural, educational, recreational and social needs	-	Indirect	Long	Permanent	Local	<p>This option has no Key Growth Areas sites in the northern part of the Borough, and thus will not provide any investment this area. It will not address the sustainability issue of socio-spatial inequalities between the North and South of the Borough. Limitations on range of tenure and size will also limit the ability to address the range of housing requirements noted as sustainability issues.</p>
5. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system, reducing car use for all journey lengths.	0	N/A	N/A	N/A	N/A	<p>These sites already benefit from transport systems that can be further upgraded for sustainable uses. Sites are in proximity to housing, which should reduce additional car journeys.</p> <p>Lack of investment in the North of the Borough, will not address the sustainable transport challenges in that area, such as</p>

Table B.2: Assessment of Strategic Growth Option 2: Key Growth Areas

SA Objective	Significance	Direct/ Indirect/ Cumulative	Duration (short, med, long term)	Permanent/ Temporary Irreversible/ Reversible	Magnitude / Spatial Extent	Discussion of significant effects and relative merits more generally
						<p>less public transport and reliance on private vehicles. This is counter to the sustainability issue of delivering transport infrastructure and new facilities across the Borough.</p> <p>Overall benefits and drawbacks appear equal with information available at this stage.</p>
6. Prevent production of waste, improve resource efficiency and increase recycling and recovery	0	N/A	N/A	N/A	N/A	<p>Increased numbers of tall buildings with flats may lead to less recycling as there are no compulsory recycling schemes and no organics recycling currently for purpose-built flats in Waltham Forest (source: Resource London 2016, WRAP).</p> <p>Lack of investment in the North of the Borough, will not address the sustainability issue of delivering waste infrastructure and new facilities across the Borough.</p>
7. Reduce greenhouse gas emissions and promote low carbon growth	+ / -	Indirect	Long	Permanent	Regional	<p>Existing good transport links to the Key Growth Areas and proximity to housing should promote further greenhouse gas reductions through limiting additional car journeys. Lack of development in the North of the Borough will not improve emissions from transport infrastructure in that area.</p>

Table B.2: Assessment of Strategic Growth Option 2: Key Growth Areas

SA Objective	Significance	Direct/ Indirect/ Cumulative	Duration (short, med, long term)	Permanent/ Temporary Irreversible/ Reversible	Magnitude / Spatial Extent	Discussion of significant effects and relative merits more generally
8. Conserve energy	+	Direct	Long	Permanent	Local	Intensification including taller buildings could result in less energy use as new flats should be energy efficient, with implementation of energy performance in new building policies in London Plan and in accordance with building regulations.
9. Improve air quality	--	Indirect	Long	Permanent	Regional	Existing good transport links and proximity to housing should limit additional car journeys, thereby reducing air quality impacts. Lack of development in the North of the Borough will not improve emissions from transport infrastructure in that area and this could have a detrimental effect on health and Natura 2000 sites.
10. Improve water quality in rivers and groundwater and ensure the efficient use of water resources	0	N/A	N/A	N/A	N/A	It is assumed that there would not be any particular impacts on this objective resulting from this option.
11. Reduce the risk of flooding and improve resilience to climate change	?	N/A	N/A	N/A	N/A	Substantial portions of Lea Bridge and Leyton Key Growth Areas are in Flood Zones 2 and 3. However with standard mitigation practices intensification of existing development areas should not add to flood risk through loss of existing floodplain and surface water soakaway areas. Opportunities to reduce risk of flood and improve resilience to climate change would need to be determined at a subsequent SA and planning consent stages. With the information available at this stage it is unclear what the impacts will be on this objective.

Table B.2: Assessment of Strategic Growth Option 2: Key Growth Areas

SA Objective	Significance	Direct/ Indirect/ Cumulative	Duration (short, med, long term)	Permanent/ Temporary Irreversible/ Reversible	Magnitude / Spatial Extent	Discussion of significant effects and relative merits more generally
12. Ensure the efficient use of land and buildings and protect soil quality and geological resources	+ / ?	Indirect	Long	Permanent	Regional	Intensification of existing development areas ensures efficient use of land and buildings. However, the North Olympic Fringe and Blackhorse Lane Key Growth Areas have the possibility of direct impacts to geological resources in the River Lea Valley area. It is not clear that this option would protect soil and geological resources.
13. Conserve and enhance biodiversity and the natural environment, improving resilience to climate change	0	N/A	N/A	N/A	N/A	Intensification of existing development should not have limited direct impacts on biodiversity, but this option does not necessarily enhance biodiversity or improve resilience to climate change. This may need to be achieved through development control / conditioning.
14. Protect the ecological integrity of SSSI and Natura 2000 sites	--	Direct, Cumulative	Long	Permanent	National (Given protected status of sites)	Black Horse Lane Key Growth Area includes Waltham Reservoir SSSI and Lee Valley RAMSAR, a constituent SSSI of Lea Valley SPA and Wood Street Key Growth Area is adjacent to Epping Forest SSSI & SAC. Both receptors are not in favourable condition. Intensification of use and expansion of these areas needs to be carefully considered in the HRA. Further assessment would be needed at subsequent Local Plan and project stages.
15. Maintain and enhance the quality of the green belt and open space areas	+ / ?	Indirect	Long	Permanent	Local	Possibility to further improve quality of existing open spaces for Key Growth Areas in proximity to open space. Intensification of use in the Key Growth Areas and expansion of these areas may impact on these areas and would need to be carefully managed.

Table B.2: Assessment of Strategic Growth Option 2: Key Growth Areas

SA Objective	Significance	Direct/ Indirect/ Cumulative	Duration (short, med, long term)	Permanent/ Temporary Irreversible/ Reversible	Magnitude / Spatial Extent	Discussion of significant effects and relative merits more generally
						Intensification of existing development supports the policy goals to not develop open spaces and green belt areas.
16. Maintain and improve local distinctiveness	+	Direct	Medium	Temporary	Local	Intensification of existing development should provide further opportunities to improve local distinctiveness in these areas.
17. Conserve and enhance the historic built environment	-	Direct and Indirect	Long	Permanent	Local	Wood Street Key Growth Area includes a Park and Garden of Historic Interest, and there are listed buildings throughout the Key Growth Areas as well as proximity to Conservation Areas. Intensification of development in these areas includes the possibility of negative direct and setting impacts to protected sites, and negative impacts to the townscape. These could be managed through standard mitigation measures, and will need to be assessed at subsequent stages and controlled through development control / planning consent process.
18. Maintain and enhance the vitality and viability of the Borough's town centres	+ / ?	Direct and Indirect (to other Town Centres)	Medium	Temporary	Local	Intensification of existing development should provide further opportunities to improve vitality and viability of town centres. Focusing development on these locations may result in under development in other areas; the Core Strategy noted there are 6 district centres, 9 neighbourhood centres and 19 local retail parades.

Table B.2: Assessment of Strategic Growth Option 2: Key Growth Areas

SA Objective	Significance	Direct/ Indirect/ Cumulative	Duration (short, med, long term)	Permanent/ Temporary Irreversible/ Reversible	Magnitude / Spatial Extent	Discussion of significant effects and relative merits more generally
19. Improve the local economy by enabling employment developments in appropriate places	+	Direct	Medium	Permanent	Local	Intensification should provide further opportunities for employment developments in appropriate places.
20. Maintain stable levels of employment in the Borough	+	Direct	Medium	Temporary	Local	Intensification should provide further opportunities for employment.

Growth Option 3 - Growth Hubs

Option wording:

“We would identify opportunities for growth on a number of smaller sites or areas, without further intensification in the existing Key Growth Areas. These new areas would be called Growth Hubs and would deliver a wider spread of growth throughout the Borough. Sites or areas in the north of the Borough would be included. Currently, there are no identified growth areas in the north of the Borough.

Growth Hubs could include areas of smaller clusters of vacant, brownfield or underused land, estate regeneration sites, and development sites in town centres or other accessible locations. This option would need to be carefully coordinated to avoid a fragmentary pattern of unsustainable development, resulting in areas becoming economically, environmentally and socially unbalanced. Growth Hubs would be designated in appropriately accessible locations or would include proposals to improve accessibility to be delivered as part any development.”

Assessment assumptions:

- Growth Hubs could be located throughout the Borough. Figure 5.3 (of the Direction of Travel document) shows five areas which have come forward at this point, but these are subject to change and have not been assessed as specific sites to be taken forward. It is noted that they are spread throughout the Borough.
- This option means development throughout (not just Town Centres (Option 4), and not just KGAs (all in South of Borough, Option 2).
- Provides a clear commitment to “accessible locations” or to “improve accessibility”; this is taken to mean good sustainable transport access.

SA Objective	Significance	Direct/ Indirect/ Cumulative	Duration (short, med, long term)	Permanent/ Temporary Irreversible/ Reversible	Magnitude / Spatial Extent	Commentary
1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	+	Direct	Long term	Permanent	Local	<p>Due to the flexibility of this option it is likely to deliver a range of tenures and sizes of new dwellings. It will allow for development in the North of the Borough, which is not served by Key Growth Areas in the current Core Strategy.</p> <p>These sites are likely to be smaller than other spatial approaches (Key Growth Areas, Town Centres). There is a risk of fragmentary development that would need to be carefully managed.</p>

Table B.3: Assessment of Strategic Growth Option 3: Growth Hubs

SA Objective	Significance	Direct/ Indirect/ Cumulative	Duration (short, med, long term)	Permanent/ Temporary Irreversible/ Reversible	Magnitude / Spatial Extent	Commentary
2. Reduce crime and the fear of crime	+/?	Indirect	Medium Term	Temporary	Local	The extent of impacts to fear and crime are unclear at this stage. Growth Hubs could be targeted at areas with increased crime rates, but this would need to be assessed in future stages of Plan development. There is the potential that benefits from community cohesion (detailed below in 4,) will have an indirect impact on reducing crime and fear for from.
3. Improve standard of health and wellbeing of those who live and work in the Borough	+/?	Indirect	Medium Term	Temporary	Local	The extent of impacts to health and wellbeing are unclear at this stage. The flexibility of option allows for further targeting of development at areas with low standards of health and wellbeing, but this would need to be assessed in future stages. The positive impacts to the integrated transport system (detailed below in 5.) could have in indirect positive impact on health and wellbeing.
4. Improve community cohesion and reduce inequalities through the provision of community facilities to meet local cultural, educational, recreational and social needs	++ / ?	Direct	Long term	Permanent	Local	Growth Hubs should provide the opportunity to target development outside of existing regeneration sites (Key Growth Areas) and town centres. This facilitates investment throughout the Borough. It should help to address socio-spatial inequalities evidenced in the 2011 Census, noted to be key sustainability issues. The flexible and fine-grained nature of this option could help to address neighbourhood-level disparities, which were noted to be a key sustainability issue. This could be a significant positive impact; however, the extent of the positive

Table B.3: Assessment of Strategic Growth Option 3: Growth Hubs

SA Objective	Significance	Direct/ Indirect/ Cumulative	Duration (short, med, long term)	Permanent/ Temporary Irreversible/ Reversible	Magnitude / Spatial Extent	Commentary
						<p>impact is not clear with the information available.</p> <p>These sites are likely to be smaller than other options and therefore delivery of community facilities could be more difficult due to funding and space constraints. There is a risk of fragmentary development that would need to be carefully managed.</p>
5. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system, reducing car use for all journey lengths.	+	Direct	Long term	Permanent	Local	This option provides a commitment to develop accessible locations or improve accessibility. Development of sustainable transport in the North of the Borough, where more journeys are by car and there is reduced use of public transportation, should have a positive impact.
6. Prevent production of waste, improve resource efficiency and increase recycling and recovery	+	Indirect	Long	Permanent	Local	The flexibility of this option should allow for incorporating the circular economy approach as a means to manage waste in the most environmentally friendly way. Further work would be needed on this to determine possibilities for benefits.
7. Reduce greenhouse gas emissions and promote low carbon growth	+ / ?	Indirect	Medium term	Temporary	Regional	Commitment to development in accessible locations should translate into reduced car journeys and therefore improvements in greenhouse gas emissions. Not clear if would promote low carbon growth, which would need to be controlled through planning policy / development control.
8. Conserve energy	0	N/A	N/A	N/A	N/A	While Growth Hubs could promote the construction of energy efficient buildings, and provide a strategic approach to

Table B.3: Assessment of Strategic Growth Option 3: Growth Hubs

SA Objective	Significance	Direct/ Indirect/ Cumulative	Duration (short, med, long term)	Permanent/ Temporary Irreversible/ Reversible	Magnitude / Spatial Extent	Commentary
						energy conservation (such as through neighbourhood heating systems), there is also a risk of piecemeal development due to smaller size of the Growth Hubs areas. The positives and negatives appear to balance with the information available at this stage.
9. Improve air quality	+	Indirect	Medium term	Temporary	Local, Sub-Regional, Regional	The commitment to accessible locations should translate into reduced car journeys and therefore improvements in air quality.
10. Improve water quality in rivers and groundwater and ensure the efficient use of water resources	0	N/A	N/A	N/A	N/A	It is assumed that there would not be any particular impacts on this objective resulting from this option.
11. Reduce the risk of flooding and improve resilience to climate change	?	N/A	N/A	N/A	N/A	Unclear if there would be impacts on this objective with information available at this stage. Possibility exists for direct negative impacts to flood zones, no evidence of improving resilience to climate change.
12. Ensure the efficient use of land and buildings and protect soil quality and geological resources	?	N/A	N/A	N/A	N/A	The option has the potential for efficient land uses, and consequently the protection of soil quality and geological resources. Lack of detail at this stage makes the potential for effects unclear.
13. Conserve and enhance biodiversity and the natural environment, improving resilience to climate change	?	N/A	N/A	N/A	N/A	The option has the potential for conservation and enhancement of biodiversity, but also could entail intensification of development in areas with biodiversity value. No evidence of improving resilience to climate change. Lack of detail at this stage makes the significance of this unclear.

Table B.3: Assessment of Strategic Growth Option 3: Growth Hubs

SA Objective	Significance	Direct/ Indirect/ Cumulative	Duration (short, med, long term)	Permanent/ Temporary Irreversible/ Reversible	Magnitude / Spatial Extent	Commentary
14. Protect the ecological integrity of SSSI and Natura 2000 sites	?	N/A	N/A	N/A	N/A	Lack of detail at this stage makes the assessment uncertain. Key Growth Hubs could be located at any place in the Borough so there is a possibility of direct or indirect negative impacts. However, the flexibility of the approach should allow for avoidance of impacts.
15. Maintain and enhance the quality of the green belt and open space areas	0	N/A	N/A	N/A	N/A	This option should not affect Green Belt of open space areas.
16. Maintain and improve local distinctiveness	+	Direct	Long term	Permanent	Local	Flexible nature of the Growth Hubs option should allow for targeting of redevelopment to enhance local distinctiveness.
17. Conserve and enhance the historic built environment	?	N/A	N/A	N/A	N/A	Possibility of direct negative impacts to designated historic sites. Lack of detail at this stage makes the significance of this unclear but it is assumed that mitigation should be possible using standard techniques.
18. Maintain and enhance the vitality and viability of the Borough's town centres	-	Indirect	Medium term	Temporary	Local	Assume that this option does not include town centres, as that is a separate option. Thus this option is unlikely to contribute to vitality and viability of town centres and it is possible that the option could detract from them.
19. Improve the local economy by enabling employment developments in appropriate places	+ / ?	Direct	Long term	Permanent	Local	This option should provide substantial flexibility in enabling employment developments. There is a risk of fragmented development.
20. Maintain stable levels of employment in the Borough	+	Direct	Medium Term	Temporary	Local	Flexibly in providing employment sites should contribute to a positive effect on employment generation.

Growth Option 4 - Town Centres

Option wording:

“We would focus growth within the Borough’s existing Town Centres. These include Walthamstow, North and South Chingford, Highams Park, Wood Street, Leyton, Leytonstone and Bakers Arms. Town centres have an important role to play in accommodating future homes, employment, social and community infrastructure, cultural and entertainment uses. They are sustainable locations accessible by public transport, walking and cycling. Potential for new centres at Lea Bridge and Blackhorse Lane, as well as opportunities to expand existing District and Neighbourhood Centres could also be considered as part of this Option.

Our Town Centres have potential to accommodate further growth including new development proposals that are coming forward. There is however a limit to land capacity and to the number of available sites. To accommodate the anticipated levels of growth, some new and existing development sites in Town Centres may require greater intensification, density and the delivery of taller buildings.”

Assessment assumptions:

- This option would entail further development in the Town Centre areas shown in Figure 5.4. While Figure 5.4 illustrates individual buildings, we have not assessed implications at the building level.
- This is different to the options which target Growth Hubs (which are smaller and could be located throughout the Borough, in Option 3), and the Key Growth Areas (Option 2, regeneration sites all in South of Borough).
- All are in sustainable transport locations.
- Some tall buildings may be required.

SA Objective	Significance	Direct/ Indirect/ Cumulative	Duration (short, med, long term)	Permanent/ Temporary Irreversible/ Reversible	Magnitude / Spatial Extent	Commentary
1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	0	N/A	N/A	N/A	N/A	The town centres targeted by this option should promote additional housing in a range of tenures and sizes, spread throughout the Borough. Given the high housing targets, some intensification with tall buildings may be needed. Tall buildings are unlikely to produce a good a range of tenures and sizes. It is not clear what impact there would be on balance between provision of sites and range limitations in tall buildings. Benefits and drawbacks appear equal and neither is considered significant.

Table B.4: Assessment of Strategic Growth Option 4: Town Centres

SA Objective	Significance	Direct/ Indirect/ Cumulative	Duration (short, med, long term)	Permanent/ Temporary Irreversible/ Reversible	Magnitude / Spatial Extent	Commentary
2. Reduce crime and the fear of crime	+	Indirect	Medium	Temporary	Local	Some of the town centres have recently had high crime rates (e.g. High Street and Lea Bridge had consistently high crime rates in 2017), so further investment in these areas would have a positive impact on crime.
3. Improve standard of health and wellbeing of those who live and work in the Borough	+/?	Indirect	Medium	Permanent	Local	For those town centres in proximity to open space (Chingford, Leytonstone, Leyton) there is the possibility of improving access to existing open spaces, subsequently providing health and wellbeing benefits. Over-concentration of employment use could have negative impacts for open space quality (due to over use) and provision (due to development pressures) in these town centre areas.
4. Improve community cohesion and reduce inequalities through the provision of community facilities to meet local cultural, educational, recreational and social needs	+	Direct	Long term	Permanent	Local	This option is likely to deliver a range of community facilities associated with housing and employment development throughout the Borough, in the town centres noted.
5. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system, reducing car use for all journey lengths.	+	Direct	Long term	Permanent	Local	Policy option gives clear commitment to development in locations with existing sustainable transport. Development of sustainable transport in the North of the borough, where there is reduced use of public transportation and more journeys are by private vehicle, should have a positive impact.
6. Prevent production of waste, improve resource efficiency and increase recycling and recovery	+	Indirect	Long	Permanent	Local	Spatial spread of town centre sites supports delivery of infrastructure across the Borough. This option should provide some opportunities for re-use of buildings, or other approaches in the emerging circular economy waste policy for London.
7. Reduce greenhouse gas emissions and promote low	+ / ?	Indirect	Medium term	Temporary	Regional	Commitment to development in accessible locations should translate into reduced car journeys and

Table B.4: Assessment of Strategic Growth Option 4: Town Centres

SA Objective	Significance	Direct/ Indirect/ Cumulative	Duration (short, med, long term)	Permanent/ Temporary Irreversible/ Reversible	Magnitude / Spatial Extent	Commentary
carbon growth						therefore improvements in greenhouse gas emissions. Not clear if it would promote low carbon growth.
8. Conserve energy	?	N/A	N/A	N/A	N/A	Unclear if there would be impacts on this objective with information available at this stage. Retrofit of older buildings in these town centres will be required. New buildings would be delivered in line with planning policies and building regulations and would therefore be energy efficient.
9. Improve air quality	+	Indirect	Medium term	Temporary	Local, Sub- Regional, Regional	Commitment to accessibility should translate into reduced car journeys and therefore improvements in air quality.
10. Improve water quality in rivers and groundwater and ensure the efficient use of water resources	0	N/A	N/A	N/A	N/A	It is assumed that there would not be any particular impacts on this objective resulting from this option.
11. Reduce the risk of flooding and improve resilience to climate change	0	N/A	N/A	N/A	N/A	The town centres are outside Flood Zones 2 and 3. There is no evidence of improving resilience to climate change.
12. Ensure the efficient use of land and buildings and protect soil quality and geological resources	+	Indirect	Long	Permanent	Regional	Intensification of existing development areas ensures efficient use of land and buildings.
13. Conserve and enhance biodiversity and the natural environment, improving resilience to climate change	0	N/A	N/A	N/A	N/A	Intensification of existing development in town centres should have a limited indirect positive impact on biodiversity, but there is no evidence of enhancement or improvement of resilience to climate change. Positive effects for biodiversity may need to be achieved through development control / obligations.
14. Protect the ecological integrity of SSSI and Natura 2000 sites	0	N/A	N/A	N/A	N/A	Wood Street Town Centre is near to the Epping Forest SSSI and SAC site. However, it is not certain that intensification of use in this area would result in

Table B.4: Assessment of Strategic Growth Option 4: Town Centres

SA Objective	Significance	Direct/ Indirect/ Cumulative	Duration (short, med, long term)	Permanent/ Temporary Irreversible/ Reversible	Magnitude / Spatial Extent	Commentary
						any adverse effects on the SAC and this would need further considered in the HRA if this option were taken forward.
15. Maintain and enhance the quality of the green belt and open space areas	+	Indirect	Long	Permanent	Local	Intensification of existing developed areas supports the sustainability objective to maintain open spaces and Green Belt areas.
16. Maintain and improve local distinctiveness	+	Direct	Medium	Temporary	Local	This policy should provide further opportunities to improve local distinctiveness in these Town Centres.
17. Conserve and enhance the historic built environment	-	Direct and Indirect	Long	Permanent	Local	A number of historic built environment sites (e.g. conservation areas and listed buildings) could be directly impacted by town centre development. Intensification of development in these areas includes the possibly of direct and setting negative impacts to protected sites, and negative impacts to the townscape. These could be managed through standard mitigation measures and will need to be assessed at subsequent Plan-development stages.
18. Maintain and enhance the vitality and viability of the Borough's town centres	++	Direct	Medium	Temporary	Local	This policy should provide further opportunities to improve vitality and viability of the named town centres and should result in significant positive effects.
19. Improve the local economy by enabling employment developments in appropriate places	+	Indirect	Medium	Permanent	Local	This policy should provide further opportunities to develop employment sites in appropriate places.
20. Maintain stable levels of employment in the Borough	+	Direct	Medium	Temporary	Local	This policy should provide further opportunities to develop employment sites.

Growth Option 5 - Combined Approach

Option wording:

“We would bring forward Options 2, 3 and 4 as a combined approach to deliver growth. The existing Key Growth Areas would be retained and we would consider where further growth could be accommodated in Town Centres and new Growth Hubs.

Optimising growth in this way would lead to a more strategically co-ordinated approach and allow wider distribution of development across the Borough. Linkages between Key Growth Areas, Town Centres and Growth Hubs would be enhanced, leading to a less fragmentary pattern of development. More residents would be able to access the benefits arising from this form of growth.”

Assessment assumptions:

- This option combines Options 2, 3 and 4. Development will be intensified in Key Growth Areas and Town Centres, including possibly minor changes to the boundaries of Key Growth Areas. Growth Hubs will be designated at any possible location in the Borough.
- The assumptions for the previous options apply. However, assume that tall buildings will not be required as substantially as in the option for KGAs only.

SA Objective	Significance	Direct/ Indirect/ Cumulative	Duration (short, med, long term)	Permanent/ Temporary Irreversible/ Reversible	Magnitude / Spatial Extent	Commentary
1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	++	Direct	Long	Permanent	Local	<p>The combined nature and flexibility of this approach is likely to produce a good range of tenures and sizes of new dwellings throughout the borough.</p> <p>The combination of Growth Hubs with Key Growth Areas and Town Centres should reduce the likelihood of piecemeal development of Growth Hubs, and present synergies in strategic development across the Borough. It should address all the relevant sustainability issues relating to housing, and is a significant positive.</p>
2. Reduce crime and the fear of crime	+	Indirect	Medium	Temporary	Local	Some of the areas (such as (High Street and Lea Bridge Key Growth Areas) had consistently high crime rates in 2017; further investment in these

Table B.5: Assessment of Strategic Growth Option 4: Combined Approach

SA Objective	Significance	Direct/ Indirect/ Cumulative	Duration (short, med, long term)	Permanent/ Temporary Irreversible/ Reversible	Magnitude / Spatial Extent	Commentary
						<p>areas could have a positive impact on crime and fear of crime.</p> <p>Growth Hubs could be targeted at areas with increased crime rates, but this would need to be assessed in future stages.</p>
3. Improve standard of health and wellbeing of those who live and work in the Borough	+	Indirect	Medium	Permanent	Local	<p>Development in proximity to open space presents the possibility of improving access to existing open spaces, with associated indirect health and wellbeing benefits.</p> <p>Flexibility of option allows for further targeting of development at areas with low standards of health and wellbeing, but this would need to be assessed in future stages.</p>
4. Improve community cohesion and reduce inequalities through the provision of community facilities to meet local cultural, educational, recreational and social needs	++ / ?	Indirect	Long	Permanent	Local	<p>Growth Hubs should provide the opportunity to target development outside of existing regeneration sites (Key Growth Areas) and town centres. This facilitates investment throughout the Borough. It should help to address socio-spatial inequalities evidenced in the 2011 Census, noted to be a key sustainability issue. However, the extent of the positive impact is not clear with the information available.</p> <p>The combination of Growth Hubs with Key Growth Areas and Town Centres should reduce the likelihood of piecemeal development of Growth Hubs, and present synergies in strategic development across the Borough.</p>
5. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system,	+	Indirect	Long	Permanent	Local	<p>Key Growth Areas, Town Centres and Growth Hubs currently benefit from transport systems which can be further upgraded for sustainable uses. Development of sustainable transport in the North of Borough, where more journeys are by car and</p>

Table B.5: Assessment of Strategic Growth Option 4: Combined Approach

SA Objective	Significance	Direct/ Indirect/ Cumulative	Duration (short, med, long term)	Permanent/ Temporary Irreversible/ Reversible	Magnitude / Spatial Extent	Commentary
reducing car use for all journey lengths.						there is reduced use of public transportation, should have a positive impact.
6. Prevent production of waste, improve resource efficiency and increase recycling and recovery	+	Indirect	Long	Permanent	Local	Spatial spread of sites supports delivery of infrastructure across the Borough. This option should provide some opportunities for re-use of buildings, or other approaches in the emerging circular economy waste policy for London. Further work would be needed on this to determine possibilities for benefits.
7. Reduce greenhouse gas emissions and promote low carbon growth	+ / ?	Indirect	Long	Permanent	Regional	Existing good transport links in these sites and proximity to housing should promote further greenhouse gas reductions through sustainable transport and limiting additional car journeys. Not clear if would promote low carbon growth.
8. Conserve energy	+	Indirect	Long	Permanent	Regional	The wide-spread and flexible nature of these areas should facilitate energy efficient new development. Due to rationalising of existing land use through flexibility of this approach, and focus on development in sustainable locations, this option may provide potential for shared energy systems.
9. Improve air quality	+	Indirect	Long	Permanent	Regional	Targeted development at already developed sites with existing good transport links and proximity to housing should limit additional car journeys, thereby reducing the air quality impacts.
10. Improve water quality in rivers and groundwater and ensure the efficient use of water resources	0	N/A	N/A	N/A	N/A	It is assumed that there would not be any particular impacts on this objective resulting from this option.
11. Reduce the risk of flooding and improve resilience to climate change	?	N/A	N/A	N/A	N/A	Substantial portions of Lea Bridge and Leyton Key Growth Areas are in flood areas 2 and 3, and there is a possibility of other sites having direct impacts on Flood Zones. This option provides more flexibility in development that Options 2, 3, and 4,

Table B.5: Assessment of Strategic Growth Option 4: Combined Approach

SA Objective	Significance	Direct/ Indirect/ Cumulative	Duration (short, med, long term)	Permanent/ Temporary Irreversible/ Reversible	Magnitude / Spatial Extent	Commentary
						which should facilitate avoidance of development in the flood plain. There is no evidence of improving resilience to climate change.
12. Ensure the efficient use of land and buildings and protect soil quality and geological resources	+	Indirect	Long	Permanent	Regional	Intensification of existing development areas ensures efficient use of land and buildings. There is a possibility of intensification of development in vacant or underused land as part of Growth Hubs.
13. Conserve and enhance biodiversity and the natural environment, improving resilience to climate change	0	N/A	N/A	N/A	N/A	Intensification primarily in existing development areas should not have a significant negative impact on biodiversity. There is no enhancement or improvement of resilience to climate change. Overall benefits and drawbacks appear equal with information available at this stage. Positive effects for biodiversity may need to be achieved through development control / obligations.
14. Protect the ecological integrity of SSSI and Natura 2000 sites	- -/?	Direct, Cumulative	Long	Permanent	National (Given protected status of sites)	Black Horse Lane Key Growth Area includes Waltham Reservoir SSSI and Lee Valley RAMSAR, a constituent SSSI of Lea Valley SPA and Wood Street Key Growth Area is adjacent to Epping Forest SSSI & SAC. Both receptors are not in favourable condition. Intensification of use and expansion of these areas needs to be carefully considered in the HRA. Further assessment would be needed at subsequent Local Plan and project stages. This option does provide more flexibility in development than Options 2,3, and 4, which could facilitate avoidance of adverse effects to these sites.
15. Maintain and enhance the quality of the green belt and open space areas	+	Indirect	Long	Permanent	Local	Possibility to further improve quality of existing open spaces, for those key growth areas in proximity to open space.

Table B.5: Assessment of Strategic Growth Option 4: Combined Approach

SA Objective	Significance	Direct/ Indirect/ Cumulative	Duration (short, med, long term)	Permanent/ Temporary Irreversible/ Reversible	Magnitude / Spatial Extent	Commentary
						Intensification of existing development supports the policy goals to not develop open spaces and green belt areas.
16. Maintain and improve local distinctiveness	+	Direct	Medium	Temporary	Local	Intensification of existing development should provide opportunities to improve local distinctiveness in areas developed.
17. Conserve and enhance the historic built environment	-	Direct and Indirect	Long	Permanent	Local	Wood Street Key Growth Area includes a Park and Garden of Historic Interest, and there are listed buildings throughout the Key Growth Areas as well as proximity to Conservation Areas. There may also be direct impacts in the Town Centres and Growth Hubs designated. Intensification of development in these areas includes the possibility of direct negative and setting impacts to protected sites, and negative impacts to the townscape. These could potentially be managed through standard mitigation measures, and will need to be assessed at subsequent stages. This option provides more flexibility than Options 2, 3, and 4, which should facilitate avoidance of direct negative impacts to heritage assets.
18. Maintain and enhance the vitality and viability of the Borough's town centres	++	Direct	Medium	Temporary	Local	Intensification of existing development in town centres should provide further opportunities to improve vitality and viability.
19. Improve the local economy by enabling employment developments in appropriate places	+	Direct	Medium	Permanent	Local	Intensification should provide further opportunities to develop employment space in appropriate places.
20. Maintain stable levels of employment in the Borough	+	Direct	Medium	Temporary	Local	Intensification should provide further opportunities to create employment opportunities.

Growth Option 6 - Exceptional Circumstances

Option wording:

“We understand the need to protect the Green Belt and Metropolitan Open Land. The NPPF only allows us to alter Green Belt boundaries in exceptional circumstances and as part of a Local Plan review. Changes to the Green Belt boundary would have to be justified by the need to promote sustainable patterns of development, channelling development towards urban areas. We would look particularly at existing brownfield land within the Green Belt. We would also have to demonstrate that all other reasonable options for meeting the Borough’s identified development requirements had been examined, particularly the number of homes required. If the required identified development requirements could not be accommodated on previously developed land, we would have to consider releasing or amending boundaries of the Green Belt and Metropolitan Open Land.”

Assessment assumptions:

- Some Greenbelt or MOL land would be redeveloped. The amount or location is not known at this stage.

SA Objective	Significance	Direct/ Indirect/ Cumulative	Duration (short, med, long term)	Permanent/ Temporary Irreversible/ Reversible	Magnitude / Spatial Extent	Commentary
1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	++/?	Direct	Long	Permanent	Local	This option would be taken forward in exceptional circumstances to meet local housing need, and as such it would have a positive impact on this SA objective. This development could address all the housing sustainability issues identified, and therefore provide a significant positive impact. However, this depends on the scale of the development proposed, and it is considered unlikely that substantial amounts of open space will be developed in order to meet all housing needs. This is uncertain at this stage.
2. Reduce crime and the fear of crime	0	N/A	N/A	N/A	N/A	Unlikely that there is crime in Greenbelt areas (recent crime data does not indicate this to be an issue). Therefore, this option may not address this objective.

Table B.6: Assessment of Strategic Growth Option 6: Exceptional Circumstances

SA Objective	Significance	Direct/ Indirect/ Cumulative	Duration (short, med, long term)	Permanent/ Temporary Irreversible/ Reversible	Magnitude / Spatial Extent	Commentary
3. Improve standard of health and wellbeing of those who live and work in the Borough	0	N/A	N/A	N/A	N/A	<p>Development in Green Belt or open space may reduce open space provision, thereby impacting on health and wellbeing.</p> <p>However, new residents of housing in open space areas may have good access to remaining / adjacent open space, and new development presents the opportunity to build high quality energy efficient housing.</p> <p>With information available at this stage a neutral effect is identified, on balance, but would fundamentally depend on the nature any proposals.</p>
4. Improve community cohesion and reduce inequalities through the provision of community facilities to meet local cultural, educational, recreational and social needs	0	N/A	N/A	N/A	N/A	<p>It is unlikely that open space development will have a significant impact on community cohesion and reduction of inequalities. Impacts will depend on the nature of the proposals; a large scale new development with substantial affordable housing could have significant beneficial impacts, but a development with limited affordable housing and with little benefit to neighbouring areas may have limited cohesion and inequality benefits.</p> <p>It is noted that new community facilities may be provided in new developments.</p> <p>With information available at this stage, a neutral effect is identified, on balance.</p>
5. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport	-	Direct	Long	Permanent	Local	<p>While it will depend on the specific site/s released, Green Belt and MOL land is typically not well served by sustainable transport systems, and new development could be reliant on private vehicles and/or require substantial</p>

Table B.6: Assessment of Strategic Growth Option 6: Exceptional Circumstances

SA Objective	Significance	Direct/ Indirect/ Cumulative	Duration (short, med, long term)	Permanent/ Temporary Irreversible/ Reversible	Magnitude / Spatial Extent	Commentary
system, reducing car use for all journey lengths.						investment in integrated transport.
6. Prevent production of waste, improve resource efficiency and increase recycling and recovery	-	Direct	Long	Permanent	Local	Waste policy promotes targeted re-use of buildings or other efficiencies, which development on Green Belt / MOL land is not likely to accommodate.
7. Reduce greenhouse gas emissions and promote low carbon growth	- / ?	Indirect	Medium	Temporary	Regional	Lack of sustainable transport to Green Belt and MOL sites is likely to curtail ability to address greenhouse gas emissions through reducing car journeys. Not clear that this option will promote low carbon growth.
8. Conserve energy	?	N/A	N/A	N/A	N/A	It is possible that a new development in open space will present a good opportunity to build high quality energy efficient housing. Overall, with information available at this stage the potential effects in relation to this objective are unclear.
9. Improve air quality	- / ?	Indirect	Medium	Temporary	Regional	Lack of sustainable transport to Green Belt / MOL sites is likely to curtail ability to address air quality impacts through reducing private vehicle journeys.
10. Improve water quality in rivers and groundwater and ensure the efficient use of water resources	?	N/A	N/A	N/A	N/A	Greenfield development which may occur in this option presents possibility of direct and indirect impacts to watercourses/the water environment. With information available at this stage it is unclear what the potential effects in relation to this objective would be.
11. Reduce the risk of flooding and improve resilience to climate change	?	N/A	N/A	N/A	N/A	With information available at this stage it is unclear that there would be impacts in relation to this objective. Greenfield development, which this option might involve, could be in floodplains and could increase flood risk elsewhere. However, no information is available about where development could take place and therefore the potential effect is uncertain.

Table B.6: Assessment of Strategic Growth Option 6: Exceptional Circumstances

SA Objective	Significance	Direct/ Indirect/ Cumulative	Duration (short, med, long term)	Permanent/ Temporary Irreversible/ Reversible	Magnitude / Spatial Extent	Commentary
12. Ensure the efficient use of land and buildings and protect soil quality and geological resources	-- / ?	Direct	Long Term	Permanent	Local	Development in open space / greenfield land is not an efficient use of land. However, if development is on brownfield sites within open space designations, that could result in positive effects in relation to efficient use of land and could improve soil quality if contamination is present. There could be direct negative effects due to loss of soils and geological resources through development of greenfield land. Further information would be needed to assess extent of potential impacts, such as location of development.
13. Conserve and enhance biodiversity and the natural environment, improving resilience to climate change	?	N/A	N/A	N/A	N/A	Possibility of direct and indirect negative effects to biodiversity receptors in Green Belt / MOL space areas, assuming that greenfield land could be developed. Further information would be needed to assess extent of potential impacts, such as location of development.
14. Protect the ecological integrity of SSSI and Natura 2000 sites	?	N/A	N/A	N/A	N/A	Possibility of direct and indirect negative effects to ecological sites in Green Belt / MOL space areas, assuming that greenfield land could be developed. Further information would be needed to assess extent of potential impacts, such as location of development.
15. Maintain and enhance the quality of the green belt and open space areas	--	Direct	Long	Permanent	Local	Direct significant negative impact in relation to this SA objective.
16. Maintain and improve local distinctiveness	0	N/A	N/A	N/A	N/A	Development in open space is unlikely to maintain or improve local distinctiveness. Possibility exists for high quality design for new development which presents new local character. On balance, potential effect is considered neutral.
17. Conserve and enhance	- / ?	Direct	Long	Permanent	Local	Unlikely to be direct negative effects on known

Table B.6: Assessment of Strategic Growth Option 6: Exceptional Circumstances

SA Objective	Significance	Direct/ Indirect/ Cumulative	Duration (short, med, long term)	Permanent/ Temporary Irreversible/ Reversible	Magnitude / Spatial Extent	Commentary
the historic built environment						historic sites in open space, although that will depend on the location and nature of the proposals. There is the potential for unknown archaeology, setting impacts and negative impacts to the historic landscape through development.
18. Maintain and enhance the vitality and viability of the Borough's town centres	-	Direct	Long	Permanent	Local	Development in open space is unlikely to maintain or enhance town centres. Possibility of large out of town development that could have a negative impact on town centres in the Borough.
19. Improve the local economy by enabling employment developments in appropriate places	+	Direct	Long	Permanent	Local	Open space development could facilitate employment developments.
20. Maintain stable levels of employment in the Borough	+	Direct	Medium	Permanent	Local	Open space development could facilitate employment creation.

Annex C

1.2 Detailed Appraisal Tables for the Potential Policy Directions Appraisals

The following tables C.1 to C.10 present the detailed assessments of the potential policy directions presented under ten topic headings.

Significance has been determined with reference to the following definitions:

Symbol	Definitions of Significance of Effects Against the SA Objectives
++	The option supports the achievement of this objective; it addresses all relevant sustainability issues and could result in a potentially significant beneficial effect e.g. improved access by walking and cycling modes to a local or town centre
+	The option supports the achievement of this objective; it addresses some relevant sustainability issues, although it may have only a minor beneficial effect
0	The option has no impact or effect and is neutral insofar as the benefits and drawbacks appear equal and neither is considered significant
?	Uncertain or insufficient information on which to determine the appraisal at this stage
-	The option appears to conflict with the achievement of this objective; it does not address relevant sustainability issues and may result in minor adverse effects
--	The option works against the achievement of this objective; it could exacerbate relevant sustainability issues and may result in a potentially significant adverse effect e.g. loss of all or part of a designated ecological site of national importance

Decent Homes for Everyone

Potential policy directions:

1. Maximising opportunities to increase the supply of additional homes in the Borough. This includes looking at the redevelopment of brownfield land, supporting Estate Regeneration and working with other sectors such as Registered Providers to maximise any regeneration opportunities within their estate.
2. Supporting and encouraging the delivery of affordable housing.
3. Encouraging a range of housing including sheltered housing, residential and nursing care homes; student housing, modular housing, community-led housing, self-build, custom build housing models and Build to Rent.
4. Supporting a mixture of housing tenures (e.g. London Living Rent, London Affordable Rent) and unit sizes including family accommodation
5. Continuing to protect the Borough's housing stock from inappropriate conversion to flats or Homes in Multiple Occupation.
6. Safeguarding existing gypsy and traveller sites (Peacock Close, Folly Lane) and considering future needs.

SA Objective	Policy Directions					
	1	2	3	4	5	6
SA1 (housing)	+	+	+	+	+	+
	By maximising opportunities to increase the supply of housing within the Borough, option 1 will work towards the achievement of some of the sustainability issues. In order to result in significant positive effects and address all of the housing issues, it will need to be delivered alongside the policy direction options 2-5.	By encouraging the delivery of affordable housing, Option 2 addresses some of the identified housing issues. If taken forward with policy directions 1, 3, 4, and 5 Option 2 will support all of the identified housing issues and should result in significant positive effects	Option 3 will help to address some of the sustainability issues identified in relation to housing and, if taken forward with the policy direction options 1, 2, 4 and 5 would result in significant positive effects.	Option 4 will help to address some of the sustainability issues identified in relation to housing and, if taken forward with the other policy direction options 1, 2, 3 and 5, would result in significant positive effects.	Option 5 helps to provide suitable housing, such as family housing and may help to avoid overcrowding. If combined with the other options 1-4, this option would contribute to addressing housing issues identified.	Option 6 will help to meet the needs of gypsy and travellers.
SA2 (crime)	0	0	0	0	0	0
None of the policy direction options are likely to affect crime and fear of crime.						

Table C.1: Assessment of Decent Homes for Everyone Policy Directions

SA Objective	Policy Directions					
	1	2	3	4	5	6
SA3 (health)	+	+	+	+	+	+
	Maximising housing delivery should help improve health and wellbeing through provision of decent homes for all including family homes, student accommodation, care homes and reducing overcrowding and poor living conditions	Delivering affordable housing should support improvement of wellbeing for people in the Borough	Delivering a range of housing types should help meet needs and support improvement of wellbeing for people in the Borough	Delivering a mixture of housing tenures should help meet needs and support improvement of wellbeing for people in the Borough	Reducing the sub-division of housing and conversion of family houses into flats could avoid overcrowding and help to ensure suitable family accommodation is provided in the Borough, contributing to good health and well being	Safeguarding existing gypsy and traveller sites should help meet needs and support health and wellbeing for gypsy and travellers
SA4 (community cohesion and access to facilities)	?	+	+	0	0	0
	New housing developments should be accompanied by provision of community facilities to meet local cultural, educational, recreational and social needs	Provision of affordable housing supports community cohesion	Supporting the delivery of a range of different housing types should support community cohesion, assuming that these types are delivered in suitable places e.g. student accommodation near to education and transport hubs	Not likely to affect community cohesion / access to community facilities.		

Table C.1: Assessment of Decent Homes for Everyone Policy Directions

SA Objective	Policy Directions					
	1	2	3	4	5	6
SA5 (sustainable transport access)	?	0	0	0	0	0
	New housing developments should be well served by sustainable transport modes and include community, retail, employment local services within reasonable walking distance.	Not likely to affect access by sustainable transport.				
SA6 (waste)	--/?	0	0	0	0	0
	New housing developments should be designed to be resource efficient and developed in ways which minimise waste generation. New housing developments should be accompanied by sufficient waste/recycling/recovery facilities.	Not likely to affect waste reduction and resource efficiency.				
SA7 (greenhouse gas emissions)	--/?	0	0	0	0	0
	New housing developments should be designed to be energy efficient and make use of renewable and low carbon energy sources and materials.	Not likely to affect greenhouse gas emissions.				
SA8 (energy)	--/?	0	0	0	0	0
	New housing developments should be designed to be energy efficient.	Not likely to affect energy conservation.				

Table C.1: Assessment of Decent Homes for Everyone Policy Directions

SA Objective	Policy Directions					
	1	2	3	4	5	6
SA9 (air quality)	--/?	0	0	0	0	0
	New housing development would need to be accompanied with good access to sustainable transport modes in order to avoid increasing use of private vehicles and contributing to air pollution issues.	Not likely to affect air quality.				
SA10 (water)	--/?	0	0	0	0	0
	New developments would need to be designed to ensure that groundwater resources are protected.	Not likely to affect water quality or water use.				
SA11 (climate change resilience)	--/?	0	0	0	0	0
	New developments would need to be designed to be resilient to climate change.	Not likely to affect flood risk or resilience to climate change.				
SA12 (soils and geological resources)	+	0	0	0	0	0
	This option could include the regeneration of parts of the borough and the redevelopment of brownfield land. This could result in positive effects with regards to the efficient use of land.	Not likely to affect efficient use of land, soil quality and geological resources.				
SA13 (biodiversity)	--/?	0	0	0	0	0

Table C.1: Assessment of Decent Homes for Everyone Policy Directions

SA Objective	Policy Directions					
	1	2	3	4	5	6
	Maximising opportunities to increase the supply of homes could have adverse effects on biodiversity and the natural environment within the borough. New developments should be located and designed to minimise negative effects on the natural environment and biodiversity and maximise potential enhancements, and target delivering a net increase in biodiversity.	Not likely to affect biodiversity.				
	--/?	0	0	0	0	0
SA14 (integrity of SSSI and Natura 2000 sites)	Maximising opportunities to increase the supply of homes could have adverse effects on SSSI and Natura 2000 sites within and close to the Borough.	Not likely to affect ecological sites.				
	--/?	0	0	0	0	0
SA15 (green belt and open space areas)	Option could result in development of greenbelt land, if any is identified as suitable for release.	Not likely to affect green belt and quality of open spaces.				
SA16 (local distinctiveness)	0	0	0	0	0	0
	None of the policy direction options are likely to affect local distinctiveness.					

Table C.1: Assessment of Decent Homes for Everyone Policy Directions

SA Objective	Policy Directions					
	1	2	3	4	5	6
SA17 (historic environment)	--/?	0	0	0	0	0
	Maximising opportunities to increase the supply of homes could have adverse effects on the historic environment within the borough. New developments should be located and designed to minimise negative effects on the historic environment.	Not likely to affect the historic built environment.				
SA18 (town centres)	0	0	0	0	0	0
	None of the policy direction options are likely to affect the viability and vitality of town centres.					
SA19 (economy)	0	0	0	0	0	0
	None of the policy direction options are likely to affect the delivery of employment developments.					
SA20 (employment)	0	0	0	0	0	0
	None of the policy direction options are likely to affect employment levels.					
Mitigation and enhancement	<p>Mitigation:</p> <ul style="list-style-type: none"> • Potential significant negative effects on Natura 2000 and SSSI sites will need to be considered in the Habitats Regulation Assessment and at the site options stage of the SA. Potential effects should be considered and mitigation / avoidance measures put in place such as through the choice of site options, or policy wording etc. • New developments should be located and designed to minimise negative effects on the natural environment and biodiversity and maximise potential enhancements, and target delivering a net increase in biodiversity. • New developments should be located and designed to minimise negative effects on the historic environment. • New developments would need to be designed to be resilient to climate change. • New developments would need to be designed to ensure that groundwater resources are protected. • New housing development would need to be accompanied with good access to sustainable transport modes in order to avoid increasing use of private vehicles and contributing to air pollution issues. • New housing developments should be designed to be energy efficient and make use of renewable and low carbon energy sources and materials. • New housing developments should be designed to be resource efficient and developed in ways which minimise waste 					

Table C.1: Assessment of Decent Homes for Everyone Policy Directions

SA Objective	Policy Directions					
	1	2	3	4	5	6
	<p>generation. New housing developments should be accompanied by sufficient waste/recycling/recovery facilities.</p> <ul style="list-style-type: none"> • New housing developments should be well served by sustainable transport modes and include community, retail, employment local services within reasonable walking distance. • New housing developments should be accompanied by provision of community facilities to meet local cultural, educational, recreational and social needs. 					

Building a Resilient Economy

Potential policy directions:

1. Supporting the retention of existing employment floor space and jobs.
2. Promoting more office space development within accessible locations.
3. Ensuring efficient use of land by densifying and intensifying new and existing employment uses and jobs, including a review of how employment uses can be layered with other uses.
4. Promoting employment uses as part of mixed use schemes.
5. Supporting the delivery of affordable and connected workspace.
6. Encouraging the development of creative enterprise zones.
7. Supporting the delivery of employment training opportunities through the planning system.

SA Objectives	Policy Directions						
	1	2	3	4	5	6	7
	0	0	0	0	0	0	0
SA1 (housing)	Assumes retaining existing office space is compatible with housing targets.		Does not specifically help to deliver housing targets but does not work against it.		Not likely to affect meeting housing needs.		
	0	0	0	0	0	0	+
SA2 (crime)	Not likely to affect crime or fear of crime.						May indirectly help to reduce crime and raise aspirations over the long term.
	0	0	0	0	0	0	0
SA3 (health)	All of the options will not have a direct effect on health and wellbeing but, through supporting the local economy and, in the case of policy direction options 7, improve skills and employability, the options could all indirectly support wellbeing through supporting and improving employment rates.						

Table C.2: Assessment of Building a Resilient Economy Policy Directions

SA Objectives	Policy Directions						
	1	2	3	4	5	6	7
SA4 (community cohesion and access to facilities)	0	0	0	0	0	0	+
	Not likely to affect provision of or access to community, cultural, educational and social facilities.						Supports meeting community needs with respect to training and education.
SA5 (sustainable transport access)	0	+	+/?	+	0	0	0
	Retention of existing employment floor space may not support or work against this objective.	Promoting more office space in accessible locations supports this objective, reducing car journeys.	Layering other uses with employment uses may help to reduce the need to travel and reduce journeys by private vehicle.	Developing new employment uses as part of mixed use schemes should help to reduce the need to travel and reduce journeys.	Supporting the delivery of affordable and connected workspaces may not support or work against this objective.	Encouraging creative enterprise zones may not support or work against this objective.	Supporting the delivery of employment training opportunities is not likely to affect physical access to employment opportunities.
SA6 (waste)	0	--/?	+	0	0	0	0
	No effect on waste generation or resource efficiency through retaining existing employment uses.	Promoting more office space developments could result in construction and operational waste generation.	Intensifying employment uses should, result in the efficient use of land but could result in waste arisings from construction and operation.	Not likely to affect waste arisings or resource efficiency.			
SA7 (greenhouse gas emissions)	0	--/?	--/?	+/?	0	0	0
	Retaining existing employment uses and jobs	Promoting more office developments could result in an	New employment uses delivered through this approach could	This could help to reduce greenhouse gas emissions from	Not likely to affect greenhouse gas emissions.		

Table C.2: Assessment of Building a Resilient Economy Policy Directions

SA Objectives	Policy Directions						
	1	2	3	4	5	6	7
	will maintain status quo with regards to greenhouse gas emissions.	increase in greenhouse gas emissions.	result in an increase in greenhouse gas emissions.	transport but it depends on the type of employment created i.e. whether employees would live locally.			
	0	--/?	--/?	+/?	0	0	0
SA8 (energy)	Retaining existing employment uses and jobs will maintain status quo with regards to energy use.	Promoting more office developments could result in an increase in energy use but could also help to deliver more energy efficient employment facilities, through new developments.	New employment uses delivered through this approach could result in an increase in energy use but could also help to deliver more energy efficient employment facilities, through new developments.	Promoting employment uses as part of mixed use schemes compared to standalone employment schemes could help to reduce energy use in transport but it depends on the type of employment created i.e. whether employees would live locally.	Not likely to affect energy use.		
	0	+	0	+/?	0	0	0
SA9 (air quality)	Retaining existing employment uses and jobs will maintain status quo with regards to air quality.	Option should locate office developments in accessible locations (assuming access is by sustainable transport modes)	There is an opportunity for this policy option to improve air quality through locating densification and intensification of employment uses	Could help to improve air quality but it would depend on whether employees could live locally and accessibility of	Not likely to affect air quality.		

Table C.2: Assessment of Building a Resilient Economy Policy Directions							
SA Objectives	Policy Directions						
	1	2	3	4	5	6	7
		supports improving air quality.	in areas with good access by public transport. See below.	such schemes to public transport.			
	0	0	0	0	0	0	0
SA10 (water)	Retaining existing employment uses and jobs will maintain status quo with regards to water use and impacts on the water environment.	This option could result in negative effects on the water environment but such effects would be carefully controlled through the development process.	This option should not specifically affect the water environment or water use. Any new employment developments should be controlled through planning policy to protect water resources and minimise water use.	Not likely to affect water use or the water environment.			
SA11 (climate change resilience)	0	0	0	0	0	0	0
	None of the policy direction options will have any particular effect on the risk of flooding or climate change resilience. Any proposals for new development would need to be subject to consideration for such impacts on a case by case basis.						
	0	0	+	0	0	0	0
SA12 (soils and geological resources)	Not likely to affect efficiency of land use or soil / geological resources.	Densifying and intensifying new and existing employment uses and jobs supports the efficient use of land	Not likely to affect efficiency of land use or soil / geological resources.				
	0	-- / ?	0	0	0	0	0
SA13 (biodiversity)	No effect on the natural environment and biodiversity from retaining existing employment flood space and jobs.	New developments could have a negative effect on biodiversity and the natural environment.	Not likely to affect biodiversity and the natural environment.				

Table C.2: Assessment of Building a Resilient Economy Policy Directions

SA Objectives	Policy Directions						
	1	2	3	4	5	6	7
SA14 (integrity of SSSI and Natura 2000 sites)	0	0	0	0	0	0	0
	None of the policy direction options will have any particular effect on SSSI or Natura 2000 sites. Any proposals for new development would need to be subject to consideration for such impacts on a case by case basis.						
SA15 (green belt and open space areas)	0	0	0	0	0	0	0
	None of the policy direction options will have any particular effect on greenbelt land or open spaces. Any proposals for new development would need to be subject to consideration for such impacts on a case by case basis.						
SA16 (local distinctiveness)	0	--/?	--/?	0	0	0	0
	Policy direction option is not likely to affect local distinctiveness.	Promoting new office space development could affect distinctiveness and this would need to be controlled through planning policy and the development control process.	Densifying and intensifying employment uses could affect distinctiveness and this would need to be controlled through planning policy and the development control process.	Not likely to affect local distinctiveness.			
SA17 (historic environment)	0	--/?	--/?	0	0	0	0
	Policy direction option is not likely to affect the historic built environment.	Promoting new office space development could affect the local historic environment and this would need to be controlled through planning policy and the development control process.	Densifying and intensifying employment uses could affect the local historic environment and this would need to be controlled through planning policy and the development control process.	Not likely to affect the historic built environment.			

Table C.2: Assessment of Building a Resilient Economy Policy Directions							
SA Objectives	Policy Directions						
	1	2	3	4	5	6	7
SA18 (town centres)	0	0	0	0	0	0	0
	None of the policy direction options will have any particular effect on town centres. Any proposals for new development would need to be subject to consideration for such impacts on a case by case basis.						
SA19 (economy)	0	+	+	+	+	+	0
	Policy direction option supports existing uses but does not necessarily improve the local economy by enabling new employment developments.	Supports delivery of new office developments.	Supports delivery of new employment space through intensification and densification.	Supports delivery of new employment space in mixed use schemes.	Supports delivery of affordable and connected workspaces.	Supports development of creative enterprise zones.	Policy direction option does not support or work against this objective.
SA20 (employment)	+	+	+	+	+	+	+
	Supports retention of current jobs.	Policy direction option should deliver jobs growth through provision of new employment uses.			Policy direction option should deliver jobs growth through supporting delivery of affordable workspace.	Policy direction option should deliver jobs in creative sectors.	Policy direction should deliver employment training opportunities.
Mitigation and enhancement	<p>Mitigation measures:</p> <p>Options 2, 3 and 4 could all result in new developments. Local Plan policies will be required to ensure new employment space developments are designed to facilitate recycling (i.e. contain sufficient storage areas). Local Plan policies should also encourage the minimisation of construction waste arisings and encourage resource efficiency; encourage the minimisation of construction and operational carbon emissions; encourage the minimisation of water use in new developments; avoid negative impacts on the natural and historic environment, biodiversity and local distinctiveness and seek to achieve improvements overall.</p> <p>Option 3: Mixed use schemes should have good public transport access.</p>						

Table C.2: Assessment of Building a Resilient Economy Policy Directions							
SA Objectives	Policy Directions						
	1	2	3	4	5	6	7
	<p>Enhancement measures:</p> <ul style="list-style-type: none"> - There is an opportunity for policy option 3 to improve air quality through locating densification and intensification of employment uses in areas with good access by public transport. - Planning policies should encourage new employment developments to be designed to high levels of energy efficiency. - An additional policy direction option could be considered to target regeneration and improve access to employment opportunities in areas of particular need to ensure that regeneration is inclusive. 						

Providing Physical Infrastructure

Potential policy directions:

1. Supporting the delivery of digital infrastructure in the Borough.
2. Supporting the delivery of required utilities in the Borough.
3. Ensuring sufficient waste sites within the Borough and opportunities to improve them.
4. Supporting the delivery of on-site utilities and waste facilities on major sites.
5. Ensuring residents have access to sustainable and accessible transport.
6. Supporting transport improvements that increase capacity, and improve user experience.

Table C.3: Assessment of Providing Physical Infrastructure Policy Directions						
SA Objectives	Policy Directions					
	1	2	3	4	5	6
SA1 (housing)	0	0	0	0	0	0
	None of the policy options are likely to affect delivery of housing.					
SA2 (crime)	0	0	0	0	0	0
	None of the policy options are likely to affect crime and fear of crime.					
SA3 (health)	0	0	0	0	+	+
	Not likely to affect health and wellbeing of residents.				Provision of sustainable transport options could help improve health through facilitating more active modes of transport and less use of private vehicles.	Improving user experience contributes to health and wellbeing, e.g. avoid overcrowding, use of newer, less-polluting technologies.
SA4 (community cohesion and access to facilities)	0	0	0	0	0	0
	None of the policy options are likely to affect community cohesion and access to facilities.					

Table C.3: Assessment of Providing Physical Infrastructure Policy Directions

SA Objectives	Policy Directions					
	1	2	3	4	5	6
SA5 (sustainable transport access)	0	0	0	+/?	+	+
	Not likely to affect access by sustainable transport.			This option could result in less transport of waste across the Borough by processing waste and providing utilities, such as power generation on site in major developments.	Supports achievement of this SA objective through provision of access to sustainable transport options.	Supports achievement of this SA objective through supporting transport improvements which increase capacity. Assume option will increase access to sustainable transport options.
SA6 (waste)	0	0	+	+	0	- - / ?
	Not likely to affect waste arisings and resource efficiency.		This option should provide new recycling and recovery facilities but will not necessarily improve resource efficiency.	This option should provide new recycling and recovery facilities but will not necessarily improve resource efficiency.	Not likely to affect waste arisings and resource efficiency.	New infrastructure developments could generate large amounts of construction waste, such as soil.
SA7 (greenhouse gas emissions)	+	0	+	+	+	+
	Providing digital infrastructure promotes remote working and reduces the need to travel, thus reducing greenhouse gas emissions associated with transport.	Not likely to affect greenhouse gas emission.	Providing sufficient waste sites in the borough reduces the need to transport waste further distances, thus reducing greenhouse gas emissions associated with transport.	Providing waste and utilities on major development sites could reduce the need for transport, making major sites more self-sufficient and reducing greenhouse gas	Should reduce greenhouse gas emissions from private vehicles.	

Table C.3: Assessment of Providing Physical Infrastructure Policy Directions

SA Objectives	Policy Directions					
	1	2	3	4	5	6
				emissions associated with transport.		
	+	0	+	+	+	+
SA8 (energy)	Providing digital infrastructure promotes remote working and reduces the need to travel, thus reducing energy use associated with transport.	Not likely to affect energy conservation.	Providing sufficient waste sites in the borough reduces the need to transport waste further distances, thus reducing energy use associated with transport. Improving waste facilities could make them more energy efficient.	Encouraging utilities provision and waste facilities on major sites should reduce transport needs and transmission distances i.e. from on-site energy generation, which will conserve energy.	Should reduce transport energy use through provision of sustainable and accessible transport for residents	
	+	0	+	+	+	+
SA9 (air quality)	Should reduce the need to travel therefore reduce motorised transport which will help to improve air quality.	Not likely to affect air quality.	Should reduce the need for waste transportation outside the borough which will help to improve air quality.	Should reduce the need for waste transportation within the borough which will help to improve air quality.	Should reduce the use of private vehicles by providing more sustainable options. This should help to improve air quality which is a problem in the Borough.	Should reduce the use of private vehicles by providing more sustainable options (public transport). This should help to improve air quality which is a problem in the Borough.
	0	+	0	0	0	0
SA10 (water)	Not likely to affect water quality or water use.	Supports provision of any necessary waste water treatment facilities	Not likely to affect water quality or water use.			Transport infrastructure improvements could result in

Table C.3: Assessment of Providing Physical Infrastructure Policy Directions

SA Objectives	Policy Directions					
	1	2	3	4	5	6
						negative effects on the water environment but such effects would be carefully controlled through the development process.
SA11 (climate change resilience)	0	0	0	0	0	0
	None of the policy options are likely to affect flood risk and climate change resilience.					
	0	0	0	0	0	-- / ?
SA12 (soils and geological resources)	Not likely to affect efficient use of land or protection of soils / geological resources.					Transport infrastructure improvements could result in the loss of soil resources e.g. through tunnel developments
	0	- / ?	- / ?	0	0	- / ?
SA13 (biodiversity)	Not likely to affect biodiversity and the natural environment.	Utilities infrastructure developments could potentially have negative effect on the natural environment, depending on the nature and location of developments.	Waste infrastructure developments could potentially have negative effect on the natural environment, depending on the nature and location of developments.	Not likely to affect biodiversity and the natural environment.		Transport infrastructure improvements could potentially have negative effect on the natural environment, depending on the nature and location of developments
SA14 (integrity of SSSI and Natura 2000 sites)	0	0	0	0	0	- / ?
	Not likely to affect	Assumes these	Assumes these	Not likely to affect ecological sites.		Transport

Table C.3: Assessment of Providing Physical Infrastructure Policy Directions

SA Objectives	Policy Directions					
	1	2	3	4	5	6
	ecological sites.	types of developments would not affect ecological sites. Any potential negative effects on ecological sites would need to be avoided through the site identification process.	types of developments would not affect ecological sites. Any potential negative effects on ecological sites would need to be avoided through the site identification process.			infrastructure improvements could potentially have negative effect on ecological sites, depending on the nature and location of developments. However, infrastructure improvements could also result in improvements in air quality, which could result in beneficial effects on Natura sites.
	0	0	0	0	0	0
SA15 (green belt and open space areas)	Not likely to affect Green Belt / open space land.	Could result in negative effects on green belt land if utilities facilities developed there. Any potential negative effects, such as in relation to landscape, would need to be controlled through the development process.	Could result in negative effects on green belt land if waste processing facilities developed there. Any potential negative effects, such as in relation to landscape, would need to be controlled through the development process.	Not likely to affect Green Belt / open space land.		Transport infrastructure improvements are unlikely to have a negative or positive effect on open space and the quality of the green belt

Table C.3: Assessment of Providing Physical Infrastructure Policy Directions

SA Objectives	Policy Directions					
	1	2	3	4	5	6
	0	0	0	0	0	0
SA16 (local distinctiveness)	Not likely to affect local distinctiveness.	Any potential negative effects on local distinctiveness, such as in relation to visual impact, would need to be controlled through the development process.	Any potential negative effects on local distinctiveness, such as in relation to visual impact, would need to be controlled through the development process.	Any potential negative effects on local distinctiveness, such as in relation to visual impact, would need to be controlled through the development process.	Not likely to affect local distinctiveness.	Any potential negative effects on local distinctiveness, such as in relation to visual impact, would need to be controlled through the development process.
	0	- / ?	- / ?	0	0	- / ?
SA17 (historic environment)	It is assumed that any improvements to digital infrastructure would require the laying of cables under streets etc, where existing utilities are located and this would therefore not affect archaeology.	Utilities infrastructure developments could potentially have negative effect on the historic environment, depending on the nature and location of developments.	Waste infrastructure developments could potentially have negative effect on the historic environment, depending on the nature and location of developments.	Not likely to affect the historic built environment.		Transport infrastructure improvements could potentially have negative effect on the historic environment, depending on the nature and location of developments.
	0	0	0	0	+	+ / ?
SA18 (town centres)	Unlikely to have a positive or negative effect on town centres.				Should improve access to town centres.	May improve access to town centres but depends on location of transport improvements.

Table C.3: Assessment of Providing Physical Infrastructure Policy Directions

SA Objectives	Policy Directions					
	1	2	3	4	5	6
SA19 (economy)	+	+	0	+	+	+
	Supports delivery of employment developments with required business (digital) infrastructure.	Provision of required utilities will meet the needs of business as well as residents.	Not likely to affect delivery of employment developments.	Provision of required utilities on a major site will meet the needs of business as well as residents, particularly if a business has a particular need, such as high energy use.	Improved sustainable transport options support business travel and employee access to places of employment.	
SA20 (employment)	+	+	0	+	+	+
	Supports businesses which rely on high quality digital infrastructure.	Provision of required utilities will meet the needs of business as well as residents, thus supporting employment provision.	Not likely to affect employment levels.	Provision of required utilities on a major site will meet the needs of business as well as residents, thus supporting employment provision.	Improved sustainable transport options support business travel and employee access to places of employment.	
Mitigation and enhancement	<p>Mitigation:</p> <p>All options: potential negative effects of all new developments will need to be controlled through careful selection of any allocation sites and through development control policies.</p> <p>Option 6: for any major transport infrastructure policies, a waste management plan would be required which followed the waste hierarchy.</p> <p>Enhancement: an additional policy direction could be considered, to improve electric car infrastructure which would help to improve accessibility and reduce air pollution.</p>					

Meeting Social and Community Infrastructure Needs

Potential policy direction:

1. Safeguarding all existing social and community infrastructure facilities including educational and health.
2. Supporting the intensification of existing social and community infrastructure facilities.
3. Encouraging social and community infrastructure facilities as part of residential or other mixed use development schemes.
4. Allocating new sites for social and community infrastructure facilities e.g. hubs of health and care facilities.
5. Ensuring social and community infrastructure facilities are located within reasonable walking distance of new and existing homes.
6. Continue to work in partnership with social and community infrastructure providers (e.g. One Public Estate) on a range of issues; including delivering more integrated, customer-focused services and generating efficiencies.

Table C.4: Meeting Social and Community Infrastructure Needs						
SA Objective	Policy Directions					
	1	2	3	4	5	6
SA1 (housing)	0	0	0	0	0	0
	None of the policy direction options are likely to have an effect on delivering housing to meet targets.					
SA2 (crime)	0	0	0	0	0	0
	None of the policy direction options are likely to have a direct effect on crime or fear of crime.					
SA3 (health)	++	++	++	++/?	++	++
	Meets health care needs and could help to improve health.	Meets health care needs and could help to improve health.	Meets health care needs and could help to improve health.	Meets health care needs and could help to improve health. The location of new healthcare hubs could make some facilities less accessible for some residents.	Meets health care needs and could help to improve health.	Meets health care needs and could help to improve health.

Table C.4: Meeting Social and Community Infrastructure Needs

SA Objective	Policy Directions					
	1	2	3	4	5	6
SA4 (community cohesion and access to facilities)	++	++	++	++	++	++
	Improves access to local community facilities.	Improves access to local community facilities.	Improves access to local community facilities.	Improves access to local community facilities.	Improves access to local community facilities.	Improves access to local community facilities.
SA5 (sustainable transport access)	+	+	+	+	++	+
	Assumes provision of facilities to meet needs of all residents close to their homes.	Assumes provision of facilities to meet needs of all residents close to their homes.	Assumes provision of facilities to meet needs of all residents close to their homes.	Assumes provision of facilities to meet needs of all residents close to their homes.	Assumes provision of facilities to meet needs of all residents within reasonable walking distance from their homes.	Assumes provision of facilities to meet needs of all residents close to their homes.
SA6 (waste)	0	0	0	0	0	0
	None of the policy direction options are likely to have an effect on waste reduction and resource efficiency.					
SA7 (greenhouse gas emissions)	0	0	0	0	+	0
	Not likely to have an effect on greenhouse gas emissions / low carbon growth.	Not likely to have an effect on greenhouse gas emissions / low carbon growth.	Not likely to have an effect on greenhouse gas emissions / low carbon growth.	Not likely to have an effect on greenhouse gas emissions / low carbon growth.	Option is likely to reduce travelling and therefore greenhouse gas emissions.	Not likely to have an effect on greenhouse gas emissions / low carbon growth.
SA8 (energy)	0	0	0	0	0	0
	None of the policy direction options are likely to have an effect on energy conservation.					
SA9 (air quality)	0	0	0	0	+	0
	Not likely to have an effect on air quality.	Not likely to have an effect on air quality.	Not likely to have an effect on air quality.	Not likely to have an effect on air quality.	Option is likely to reduce travelling and therefore emissions of air pollutants from transport	Not likely to have an effect on air quality.

Table C.4: Meeting Social and Community Infrastructure Needs

SA Objective	Policy Directions					
	1	2	3	4	5	6
SA10 (water)	0	0	0	0	0	0
	None of the policy direction options are likely to have an effect on water quality or use of water.					
SA11 (climate change resilience)	0	0	0	0	0	0
	None of the policy direction options are likely to have an effect on flood risk or climate change resilience.					
SA12 (soils and geological resources)	0	0	0	0	0	0
	None of the policy direction options are likely to have an effect on soil and geological resources and the efficient use of land.					
SA13 (biodiversity)	0	0	?	?	0	0
	Not likely to affect biodiversity and the natural environment.	Not likely to affect biodiversity and the natural environment.	New development could result in negative effects on the natural environment but the risk depends on the sites chosen and nature of development.	New development of hubs could result in negative effects on the natural environment but the risk depends on the sites chosen and nature of development.	Not likely to affect biodiversity and the natural environment.	Not likely to affect biodiversity and the natural environment.
SA14 (integrity of SSSI and Natura 2000 sites)	0	0	0	0	0	0
	None of the policy direction options are likely to have an effect on SSSI and Natura 2000 sites.					
SA15 (green belt and open space areas)	0	0	0	0	0	0
	None of the policy direction options are likely to have an effect on green belt land and open spaces.					
SA16 (local distinctiveness)	0	0	0	0	0	0
	None of the policy direction options are likely to have an effect on local distinctiveness.					

Table C.4: Meeting Social and Community Infrastructure Needs

SA Objective	Policy Directions					
	1	2	3	4	5	6
SA17 (historic environment)	0	0	0	0	0	0
	None of the policy direction options are likely to have an effect on the historic built environment or heritage assets.					
SA18 (town centres)	+/?	+/?	+/?	+/?	+/?	+/?
	Potential positive effect is community facilities are located in town centres	Potential positive effect is community facilities are located in town centres	Potential positive effect is community facilities are located in town centres	Potential positive effect is community facilities are located in town centres	Potential positive effect is community facilities are located in town centres	Potential positive effect is community facilities are located in town centres
SA19 (economy)	0	0	0	0	0	0
	None of the policy direction options are likely to have an effect on the delivery of employment developments to meet targets.					
SA20 (employment)	+	+	+	+	0	+
	Supports increase in employment in the health and care sector.	Supports increase in employment in the health and care sector.	Supports increase in employment in the health and care sector.	Supports increase in employment in the health and care sector.	Not likely to affect employment levels.	Supports increase in employment in the health and care sector.
Mitigation and enhancement	<p>Mitigation:</p> <ul style="list-style-type: none"> Options 3 and 4: Potential environmental effects of new developments should be controlled through Local Plan policies and the development control process. Option 4: hubs of healthcare facilities should be identified where there is greatest need and careful consideration would be needed to ensure that concentrating facilities in hubs ensures sufficient access facilities for all borough residents. All options: town centre vitality and viability could be supported through the co-location of community and health facilities with town centres. <p>Enhancements: No enhancements identified.</p>					

Distinctive Town Centres and High Streets

Potential policy directions:

1. Maintaining the existing town centre and high street retail hierarchy, including continuing to promote Walthamstow as the major town centre in the Borough.
2. Supporting opportunities for new areas for retail and non-retail uses in growth areas, including Lea Bridge and Blackhorse Lane.
3. Creating a sustainable pattern/distribution of town centre and high streets uses by managing the proportion, grouping and clustering of retail and non-retail uses.
4. Supporting and promoting café, restaurant and night time/ evening economy uses in designated centres.
5. Proactively managing vacant floor space in the designated centres by supporting and promoting pop-up and meanwhile uses where appropriate.
6. Creating distinctive retail centres - each with a unique 'offer' in terms of their place setting and encouraging a greater degree of differentiation and specialisation between them.
7. Proactively managing the proliferation of particular types of activities likely to make people unhealthy e.g. betting shops and hot food takeaway shops.

SA Objective	Policy Directions						
	1	2	3	4	5	6	7
	0	0	0	0	0	0	0
SA1 (housing)	None of the policy direction options are likely to affect the delivery of housing to meet targets.						

Table C.5: Distinctive Town Centres and High Streets

SA Objective	Policy Directions						
	1	2	3	4	5	6	7
	0	0	0	?	0	0	0
SA2 (crime)	Not likely to affect crime or fear of crime.	Not likely to affect crime or fear of crime.	Not likely to affect crime or fear of crime.	Encouraging the night time economy could increase footfall and evening activity, improving natural surveillance and thereby reducing some crime incidents. The High Street ward currently has the highest crime rates in Waltham Forest. Therefore, careful planning may be needed to avoid increasing crime, such as anti-social behaviour.	Not likely to affect crime or fear of crime.	Not likely to affect crime or fear of crime.	Not likely to affect crime or fear of crime.
	0	0	0	0	0	0	+
SA3 (health)	Not likely to affect health and wellbeing.	Not likely to affect health and wellbeing.	Not likely to affect health and wellbeing.	Unlikely to affect health and wellbeing. See below re. access to community / social facilities.	Not likely to affect health and wellbeing.	Not likely to affect health and wellbeing.	Assume that this option with limit proliferation of uses which would contribute to unhealthy lifestyles.

Table C.5: Distinctive Town Centres and High Streets

SA Objective	Policy Directions						
	1	2	3	4	5	6	7
SA4 (community cohesion and access to facilities)	+	+	+	+	?	?	0
	Maintains current town centre and high street facilities.	Assume this maintains current town centre and high street facilities and provides new retail and non-retail facilities in Growth Areas.	Assume this maintains current town centre and high street facilities and provides new retail and non-retail facilities in other parts of the Borough.	Could provide more social / meeting places for the community.	Uncertain whether managing vacant floor space in centres would bring social benefits.	Uncertain whether creating distinctive retail centres will bring social / community benefits.	Not likely to affect community cohesions/ access to community facilities.
SA5 (sustainable transport access)	0	0 / +	0 / +	0 / +	0	?	0
	Will not alter sustainable transport provision.	Will not alter sustainable transport provision. Could improve access to facilities in sustainable locations and reduce the need to travel.	Will not alter sustainable transport provision. Could improve access to facilities in sustainable locations and reduce the need to travel.	Will not alter sustainable transport provision. Could improve access to cafes and restaurants in sustainable locations and reduce the need to travel.	Unlikely to affect access by sustainable transport provision.	Specialisation of retail in certain parts of the Borough may reduce accessibility.	Not likely to affect access by sustainable transport modes.
SA6 (waste)	0	0	0	0	0	0	+ / ?
	Not likely to affect waste arisings or resource efficiency.						Limiting takeaways could reduce takeaway-related litter
SA7 (greenhouse gas emissions)	0	0	0	0	0	0	0
None of the policy direction options are likely to affect greenhouse gas emissions.							
SA8 (energy)	0	0	0	0	0	0	0
	None of the policy direction options are likely to affect energy conservation.						

Table C.5: Distinctive Town Centres and High Streets

SA Objective	Policy Directions						
	1	2	3	4	5	6	7
SA9 (air quality)	0	0	0	0	0	0	0
	All of the policy direction options should maintain current levels of air quality, without resulting in an increase or decrease in air pollution.						
SA10 (water)	0	0	0	0	0	0	0
	None of the policy direction options are likely to affect water quality or water use.						
SA11 (climate change resilience)	0	0	0	0	0	0	0
	Unlikely to affect flood risk and climate change resilience.	Substantial portions of Lea Bridge and Leyton Key Growth Areas are in Flood Zones 2 and 3. However with standard mitigation practices flood risk should be manageable.	Unlikely to affect flood risk and climate change resilience.				
SA12 (soils and geological resources)	0	0	0	0	+	0	0
	Not likely to affect efficient use of land and protect soil / geological resources.				Encourages use of vacant buildings and therefore efficient use of land.	Not likely to affect efficient use of land and protect soil / geological resources.	
SA13 (biodiversity)	0	0	0	0	0	0	0
	None of the policy direction options are likely to affect biodiversity and the natural environment.						
SA14 (integrity of SSSI and Natura 2000 sites)	0	0	0	0	0	0	0
	None of the policy direction options are likely to affect ecological designations.						
SA15 (green belt and open space areas)	0	0	0	0	0	0	0
	None of the policy direction options are likely to affect quality of the green belt and open space areas.						

Table C.5: Distinctive Town Centres and High Streets

SA Objective	Policy Directions						
	1	2	3	4	5	6	7
SA16 (local distinctiveness)	+	0	+	+	+	?	+
	Should help to maintain local distinctiveness but not likely to improve it.	Unlikely to improve local distinctiveness of Growth Areas but unlikely to adversely affect it either.	Should help to maintain local distinctiveness but not likely to improve it.	Should help to maintain local distinctiveness and increase vitality.	Should help to maintain local distinctiveness and increase vitality through avoiding vacant floor space.	Could contribute to improving local distinctiveness with regards to retail provision.	Managing uses such as betting shops and takeaway could contribute to maintaining and improving distinctiveness.
SA17 (historic environment)	0	0	0	0	0	0	0
	Unlikely to help to conserve and enhance historic built environment but unlikely to adversely affect it either.						
SA18 (town centres)	+	+	+	+	+	+	0
	Supports maintaining town centres but may not result in significant improvements to vitality and viability.	Assume this option does not detract from existing town centres and high streets but allows additional retail and non-retail uses in the Growth Areas.	Should help to support retail and non-retail town centre and high street businesses, through clustering, grouping and optimising distribution.	Supports maintaining town centres and should increase vitality of night time economy.	Should help to avoid vacant floor space in designated centres and support vitality and viability of pop-up and 'meanwhile' uses / businesses.	Policy option could create greater vitality in some places, creating specialist retail identities for some parts of the Borough.	Not likely to affect vitality and viability of town centres.
SA19 (economy)	+	+	+	+	+	+ / ?	-
	Supports delivery of town centre and high street employment space.	Supports retail and other businesses in Growth Areas.	Supports enabling employment developments in appropriate places.	Supports local economy, particularly cafes, restaurant and other night time economy.	Supports pop-up and 'meanwhile' uses / businesses.	Should provide opportunities for some retail businesses but may create barriers for others if there are no opportunities to move to specific retail centres.	Does not support these types of businesses.

Table C.5: Distinctive Town Centres and High Streets

SA Objective	Policy Directions						
	1	2	3	4	5	6	7
	+	+	+	+	+	+	-
SA20 (employment)	Supports town centre and high street businesses and employment.	Supports businesses in the Growth Areas.	Supports employment in retail and non-retail town centre and high street businesses.	Supports employment in cafes, restaurant and other night time economy.	pop-up and 'meanwhile' uses / businesses.	Should contribute to maintaining employment in retail in the Borough.	Works against increasing employment in these types of businesses.
Mitigation and enhancement	<p>Mitigation: Option 4: careful consideration of changes of use applications (such as to bars and nightclubs) may help to avoid anti-social behaviour, such as through avoiding concentrations of bars in parts of the town centres.</p> <p>Enhancements: None identified</p>						

Growing our Culture and Visitor Attractions

Potential policy directions:

1. Supporting the development of the cultural and creative sectors through grouping of such activities at appropriate locations e.g. cultural clusters or quarters.
2. Encouraging the provision of community spaces for local events and festivals.
3. Promoting cultural uses in designated centres e.g. galleries and performance spaces.
4. Working with developers and other stakeholders to encourage more public art and culture within developments e.g. public art, music venues, cinemas and theatres.
5. Supporting the provision of visitor accommodation within the Borough.
6. Supporting a thriving evening economy across the Borough.
7. Working to secure more public art and culture through planning obligations.

Table C.6: Assessment of Growing our Culture and Visitor Attractions Policy Directions

SA Objective	Policy Directions						
	1	2	3	4	5	6	7
SA1 (housing)	0	0	0	0	0	0	0
	None of the options would affect the delivery of housing to meet targets.						
SA2 (crime)	0	0	0	0	0	0	0
	Unlikely that this option would affect crime / fear of crime					Supporting the night time economy with regards to the creative / artist sectors and culture is unlikely to affect crime and fear of crime	Unlikely that this option would affect crime / fear of crime
SA3 (health)	0	+	0	+	0	+	+
	Unlikely that this option would specifically affect health and well-being of residents	Provision of community spaces for local events and festivals supports improving the well-being of residents	Unlikely that this option would specifically affect health and well-being of residents	Provision of public art and culture within developments supports improving the well-being of residents	Unlikely that this option would specifically affect health and well-being of residents	Supporting a thriving evening economy could support improving the well-being of residents	Securing more public art and culture supports improving the well-being of residents
SA4 (community cohesion and access to facilities)	?	+	+	+	0	0	+
	Uncertain whether clustering cultural facilities / attractions would increase access for residents. It could reduce access to new facilities if these were clustered in a limited number of places.	Supports provision of community facilities	Supports provision of cultural facilities in designated centres	Supports provision of new public art and cultural facilities within new developments	Does not support or work against this objective		Supports provision of community facilities

Table C.6: Assessment of Growing our Culture and Visitor Attractions Policy Directions

SA Objective	Policy Directions						
	1	2	3	4	5	6	7
SA5 (sustainable transport access)	?	0	+	+	0	0	0
	It is not certain that creating clusters would increase access by sustainable transport modes. Clusters should be directed to locations with good sustainable transport access.	Does not specifically support or work against this objective	May help improve access to cultural uses for residents by locating uses in designated centres which have good sustainable transport access	Would help to improve access to public art and culture for residents of new developments and possibly in neighbouring areas	Does not specifically support or work against this objective		Does not specifically support or work against this objective
SA6 (waste)	0	0	0	0	-	0	0
	Unlikely that this policy direction option would specifically affect waste arisings or resource efficiency				New visitor accommodation could create waste through construction and in operation	Unlikely that this policy direction option would specifically affect waste arisings or resource efficiency	
SA7 (greenhouse gas emissions)	0	0	+	0	-	0	0
	Unlikely that this policy direction option would specifically reduce greenhouse gas emissions		Policy direction option could provide facilities in centres which have good sustainable transport access, therefore reducing greenhouse gas emissions	Unlikely that this policy direction option would specifically reduce greenhouse gas emissions	New visitor accommodation could create greenhouse gas emissions through construction and in operation greenhouse gas emissions	Unlikely that this policy direction option would specifically reduce greenhouse gas emissions	

Table C.6: Assessment of Growing our Culture and Visitor Attractions Policy Directions

SA Objective	Policy Directions						
	1	2	3	4	5	6	7
SA8 (energy)	0	0	0	0	-	0	0
	Unlikely that this policy direction option would specifically conserve energy				New visitor accommodation could increase energy use in the Borough	Unlikely that this policy direction option would specifically conserve energy	
SA9 (air quality)	0	0	0	0	- / ?	0	0
	Unlikely that this policy direction option would specifically reduce air pollution	Policy direction option could provide facilities in centres which have good sustainable transport access, but it is unlikely to have an effect on air quality overall		Could provide more cultural facilities close to where some people live but unlikely to have an effect on air quality overall	Potential to increase air pollution. New visitor accommodation would need to be located where there is good access to sustainable transport modes and not encourage visitors to travel by private car	Unlikely that this policy direction option would specifically reduce air pollution	
SA10 (water)	0	0	0	0	-	0	0
	Unlikely that this policy direction option would specifically affect the efficient use of water or affect the water environment				New visitor accommodation would create demand for water and would need to be designed to be water efficient	Unlikely that this policy direction option would specifically affect the efficient use of water or affect the water environment	
SA11 (climate change resilience)	0	0	0	0	0	0	0
	Unlikely that any of the policy direction options would specifically affect climate change resilience or flooding						
SA12 (soils and geological resources)	0	0	0	0	0	0	0
	Unlikely that any of the policy direction options would specifically affect the efficient use of land or soil and geological resources						

Table C.6: Assessment of Growing our Culture and Visitor Attractions Policy Directions

SA Objective	Policy Directions						
	1	2	3	4	5	6	7
SA13 (biodiversity)	0	0	0	0	0	0	0
	Unlikely that any of the policy direction options would specifically affect the natural environment or climate change resilience.						
SA14 (integrity of SSSI and Natura 2000 sites)	0	0	0	0	0	0	0
	Unlikely that the policy direction options would specifically affect SSSI or Natura 2000 sites.						
SA15 (green belt and open space areas)	0	0	0	0	0	0	0
	Unlikely that any of the policy direction options would affect green belt and open spaces.						
SA16 (local distinctiveness)	? / +	0	0	+	0	0	+
	Creating cultural or creative clusters / quarters could support the enhancement of the built environment and local distinctiveness	Unlikely that this option would specifically affect local distinctiveness i.e. appearance of buildings, design of spaces		Option could help improve local distinctiveness through public art, new, well-designed cultural facilities	Unlikely that this option would specifically affect local distinctiveness i.e. appearance of buildings, design of spaces		Option could help improve local distinctiveness through public art, new, well-designed cultural facilities as part of new developments
SA17 (historic environment)	? / +	0	0	0	0	0	0
	Creating cultural or creative clusters / quarters could support the enhancement of the built environment.	Unlikely that this option would specifically affect the historic environment					Unlikely that this option would specifically affect the historic environment
SA18 (town centres)	? / +	0	+	0	0	+	0
	Could be potential to support town centres if clusters are located at or near town centres.	Does not specifically support or work against this objective	Supports vitality of town centres	Does not specifically support or work against this objective	Does not specifically support or work against this objective but there is an opportunity for	Supports vitality and viability of town centres in the evening	Does not specifically support or work against this objective

Table C.6: Assessment of Growing our Culture and Visitor Attractions Policy Directions

SA Objective	Policy Directions						
	1	2	3	4	5	6	7
					visitor accommodation to support town centres if it such developments are located within easy walking distance		
	+	0	+	+	+	+	0
SA19 (economy)	Creating clusters may have a cumulative positive effect on creative sectors and visitor attractions; by attracting focus on certain parts of the Borough.	Does not specifically support or work against this objective	Supports some creative sector businesses through provision of cultural spaces, such as galleries.	Supports some creative / leisure sector businesses through encouragement of inclusion of cultural facilities e.g. cinema, theatre, music / performance values in new developments	Supports the hotel / hospitality and other sectors through providing development space and accommodation for all types of visitor	Supports new developments which contribute to the night time economy	Does not specifically support or work against this objective
	+	0	0	+	+	+	0
SA20 (employment)	Supports employment in tourism and creative sectors.	Does not specifically support or work against this objective		Supports employment growth by providing job opportunities in cultural / creative sectors	Supports employment growth in the hotel / hospitality sector	Supports employment growth in the night time economy / hospitality sector	Does not specifically support or work against this objective

Table C.6: Assessment of Growing our Culture and Visitor Attractions Policy Directions

SA Objective	Policy Directions						
	1	2	3	4	5	6	7
Mitigation and enhancement	<p>Mitigation: Option 1:</p> <ul style="list-style-type: none"> • There could be potential to support town centres if clusters are located at or near town centres. • Opportunities to enhance local distinctiveness and built heritage, in the development of cultural and creative clusters should be sought through planning policies. • Clusters should be directed to locations with good sustainable transport access. <p>Option 5:</p> <ul style="list-style-type: none"> • The potential negative effects of new visitor accommodation developments should be minimised through planning policies, such as in relation to greenhouse gas emissions, waste generation, energy and water use. • New visitor accommodation would need to be located where there is good access to sustainable transport modes and not encourage visitors to travel by private car. <p>Enhancement: Option 5: there is an opportunity for visitor accommodation to support town centres if such developments are located within easy walking distance.</p>						

Creating High Quality Places

Potential Policy directions:

1. Continuing to support high quality and inclusive design in the public realm and development through our Design Review Panel and using current industry standards in design.
2. Promoting active living environments through connectivity and walkability in and between developments.
3. Supporting the use of Designing Out Crime principles to reduce anti-social behaviour and the fear of crime in developments and in the public realm.
4. Encouraging appropriate density, scale, massing and height in development to reflect the character, local distinctiveness, and context of the Borough.
5. Considering where tall buildings may be appropriate in the Borough.
6. Ensuring places are designed to promote positive amenity impacts and support the health and wellbeing of residents.

Table C.7: Creating High Quality Places						
SA Objective	Policy Directions					
	1	2	3	4	5	6
SA1 (housing)	0	0	0	+/?	0	0
	Not likely to affect delivery of housing to meet targets.			This works towards creating appropriately sized developments that reflect local character. This may not however, provide adequate housing numbers to meet the demand.	Not likely to affect delivery of housing to meet targets.	
SA2 (crime)	0	0	++	0	0	0
	Not likely to affect crime or fear of crime.		Using designs that aims to reduce anti-social behaviour and the fear of crime, works positively towards this objective.	Not likely to affect crime or fear of crime.		

Table C.7: Creating High Quality Places

SA Objective	Policy Directions					
	1	2	3	4	5	6
SA3 (health)	0	+	0	0	0	++
	Not likely to affect health or wellbeing.	Creating developments that encourage walking and improve accessibility works towards improving health and wellbeing.	Not likely to affect health or wellbeing.			Creating more places that support the health and wellbeing of residents works positively towards this objective.
SA4 (community cohesion and access to facilities)	0	+	0	0	0	+
	Not likely to affect community cohesion and access to facilities.	Providing better connectivity between developments will help to support community cohesion.	Not likely to affect community cohesion and access to facilities.			Providing well designed spaces with better public facilities contributes to community cohesion.
SA5 (sustainable transport access)	0	+	0	0	0	0
	Not likely to affect access by sustainable modes.	Providing better connectivity between developments will improve accessibility and encourage more residents to walk rather than use their cars.	Not likely to affect access by sustainable modes.			
SA6 (waste)	0	0	0	0	0	0
	None of the policy direction options are likely to affect waste reduction and resource efficiency.					

Table C.7: Creating High Quality Places

SA Objective	Policy Directions					
	1	2	3	4	5	6
SA7 (greenhouse gas emissions)	0	+	0	0	0	0
	Not likely to affect greenhouse gas emissions.	Providing better connectivity between developments could encourage more residents to walk, which could help to reduce air pollution.	Not likely to affect greenhouse gas emissions.			
SA8 (energy)	0	0	0	0	0	0
	None of the policy direction options are likely to affect energy conservation.					
SA9 (air quality)	0	+	0	0	0	0
	Not likely to affect greenhouse gas emissions.	Providing better connectivity between developments could encourage more residents to walk, which could help to reduce air pollution.	Not likely to affect greenhouse gas emissions.			
SA10 (water)	0	0	0	0	0	0
	None of the policy direction options are likely to affect water quality and use of water.					
SA11 (climate change resilience)	0	0	0	0	0	0
	None of the policy direction options are likely to affect flood risk and resilience to climate change.					
SA12 (soils and geological resources)	0	0	0	0	0	0
	None of the policy direction options are likely to affect the efficient use of land, soil quality and geological resources.					

Table C.7: Creating High Quality Places

SA Objective	Policy Directions					
	1	2	3	4	5	6
	0	+/?	0	0	0	0
SA13 (biodiversity)	Not likely to affect biodiversity and the natural environment.	Creating better connectivity and promoting active living environments, may help to enhance biodiversity through the provision of more green spaces.	Not likely to affect biodiversity and the natural environment.			
	0	0	0	0	0	0
SA14 (integrity of SSSI and Natura 2000 sites)	None of the policy direction options are likely to affect SSSI or Natura 2000 sites.					
	0	0	0	0	0	0
SA15 (green belt and open space areas)	None of the policy direction options are likely to affect the Green Belt and existing open space areas.					
	+	0	0	++	+	+
SA16 (local distinctiveness)	The Design Review Panel ensures that designs will be high quality and inclusive. This should help to support designs that showcase local distinctiveness.	Not likely to affect local distinctiveness.		Development will be actively encouraged to reflect local distinctiveness.	Development will be appropriate and will not detract from the local character and distinctiveness.	Ensuring places are designed to promote positive amenity impacts will contribute to local distinctiveness.

Table C.7: Creating High Quality Places

SA Objective	Policy Directions					
	1	2	3	4	5	6
SA17 (historic environment)	+/?	0	0	0	+	0
	Along with policy direction option 5, this option should help to protect and enhance the historic environment. Without policy direction option 5, this option could lead to some new developments not respecting local character and distinctiveness.	Not likely to affect the historic environment.			Ensuring that development is appropriate and reflects the local character and distinctiveness, should work towards conserving and enhancing the historic environment.	Not likely to affect the historic environment.
SA18 (town centres)	+	0	+	+	0	+
	High quality, inclusively designed public realm developments could work positively to support the viability of town centres.	Not likely to affect the vitality and viability of town centres.	Using 'designing out crime' will help to improve vitality of some parts of town centres.	Providing appropriate developments in town centres will locate more people closer to facilities within the towns, enhancing their viability.	Not likely to affect the vitality and viability of town centres.	Providing better facilities within town centres is likely to increase footfall and encourage more visits to town centres.
SA19 (economy)	0	0	0	0	0	0
	None of the policy direction options are likely to affect the delivery of employment developments.					
SA20 (employment)	0	0	0	0	0	0
	None of the policy direction options are likely to affect employment levels.					

Table C.7: Creating High Quality Places						
SA Objective	Policy Directions					
	1	2	3	4	5	6
Mitigation and enhancement	<p>Mitigation:</p> <p>Option 1: Development near to historic sites or listed building would need to be sympathetic, and not detract from the historic built environment.</p> <p>Enhancement: An additional policy direction could be considered in relation to the need to consider climate change resilience in the design of public places, including the relationship with the water environment and use of water in public places (e.g. in fountains and for cooling whilst conserving resources).</p>					

Enhancing and Preserving our Heritage

Potential policy directions:

1. Ensuring that new development respects heritage assets and their settings.
2. Promoting heritage-led regeneration and seeking appropriate beneficial uses and improvements to historic buildings, spaces and areas.
3. Promoting and encouraging access to the Borough's unique heritage offer as part of its arts and culture programme.
4. Encouraging the restoration of heritage assets at risk or under threat.

Table C.8: Enhancing and Preserving our Heritage				
SA Objective	Policy Directions			
	1	2	3	4
	0	0	0	0
SA1 (housing)	Not likely to have an effect on delivery of housing to meet targets.	Some regeneration could lead to the development of housing, but it is unlikely that this will meet the local housing needs.	Not likely to have an effect on delivery of housing to meet targets.	
	0	0	0	0
SA2 (crime)	None of the policy direction options are likely to have an effect on crime and the fear of crime.			
	0	0	0	0
SA3 (health)	None of the policy direction options are likely to have an effect on health and wellbeing.			
	0	0	+	0
SA4 (community cohesion and access to facilities)	Not likely to have an effect on community cohesion.		Promoting the Borough's unique heritage may help to celebrate local culture, heritage and encourage community cohesion. It will help to provide residents with pride of where they live.	Not likely to have an effect on community cohesion.

Table C.8: Enhancing and Preserving our Heritage

SA Objective	Policy Directions			
	1	2	3	4
SA5 (sustainable transport access)	0	0	0	0
	None of the policy direction options are likely to have an effect on accessibility by sustainable transport modes.			
SA6 (waste)	0	0	0	0
	None of the policy direction options are likely to have an effect on waste generation and resource efficiency.			
SA7 (greenhouse gas emissions)	0	0	0	0
	None of the policy direction options are likely to have an effect on greenhouse gas emissions.			
SA8 (energy)	0	0	0	0
	None of the policy direction options are likely to have an effect on energy conservation.			
SA9 (air quality)	0	0	0	0
	None of the policy direction options are likely to have an effect on air quality.			
SA10 (water)	0	0	0	0
	None of the policy direction options are likely to have an effect on the water environment and water use.			
SA11 (climate change resilience)	0	+	0	0
	Not likely to have an effect on flood risk and climate change resilience.	Option could help improve climate change resilience for some historic assets through regeneration.	Not likely to have an effect on flood risk and climate change resilience.	
SA12 (soils and geological resources)	0	0	0	0
	None of the policy direction options are likely to have an effect on soils and geological resources and the efficient use of land.			
SA13 (biodiversity)	0	0	0	0
	None of the policy direction options are likely to have an effect on the natural environment and biodiversity.			

Table C.8: Enhancing and Preserving our Heritage

SA Objective	Policy Directions			
	1	2	3	4
SA14 (integrity of SSSI and Natura 2000 sites)	0	0	0	0
	None of the policy direction options are likely to have an effect on SSSI and Natura 2000 sites.			
SA15 (green belt and open space areas)	0	0	0	0
	None of the policy direction options are likely to have an effect on green belt and open spaces.			
SA16 (local distinctiveness)	+	++	++	++
	Developments that are sensitive of historic assets will help to support the local character and distinctiveness.	Heritage led regeneration will ensure that improvements are made to historic assets which may help to improve local distinctiveness.	Promoting the Borough's unique heritage may help to celebrate local culture, heritage and local distinctiveness.	Restoring heritage assets at risk or under threat will contribute to enhancing local distinctiveness.
SA17 (historic environment)	++	++	++	++
	Sensitive development that will not detract from the historic environment contributes to achieving this objective.	Heritage led regeneration will ensure that improvements are made to historic assets and beneficial uses are found for them. This could see more use being made out of historic buildings in the Borough.	Promoting the Borough's unique heritage may help to celebrate local culture and heritage. Providing better access to historic assets will help more people enjoy them.	Restoring heritage assets at risk or under threat will contribute to enhancing the historic built environment of the Borough.
SA18 (town centres)	0	+	+	+
	Not likely to have a discernible effect on town centre viability and vitality.	Heritage led regeneration will ensure that improvements are made to historic assets and beneficial uses are found for them. This could see more use being made out of historic buildings in the Borough and support the viability of town centres if historic assets are located in or near to them.	Promoting the Borough's unique heritage may help to celebrate local culture and heritage. Providing better access to historic assets will help more people enjoy them, and could work toward improving the viability of town centres if historic assets are located in or near to them.	Restoring heritage assets at risk or under threat will work toward enhancing areas of the Borough, which could include town centres.

Table C.8: Enhancing and Preserving our Heritage				
SA Objective	Policy Directions			
	1	2	3	4
SA19 (economy)	0	0	0	0
	None of the policy direction options are likely to affect the delivery of new employment space			
SA20 (employment)	0	0	0	0
	None of the policy direction options are likely to affect employment levels			
Mitigation and enhancement	<p>Mitigation: Development of any historic asset would need to be sympathetic to its intrinsic character, and not detract from the historic built environment.</p> <p>Enhancements: None identified</p>			

Protecting and Enhancing Environment

Potential policy directions:

1. Continuing to resist the inappropriate loss of the Green Belt, Metropolitan Open Land and open spaces.
2. Supporting the provision of new open space in new development proposals.
3. Identifying areas where the new 'local green space' designation could be applied. Encouraging new development proposals to provide new or enhanced outdoor sports facilities, playing pitches and child play areas.
4. Protecting and enhancing the Borough's biodiversity, especially where habitats, species and sites are recognised at international, national, regional and local level.

SA Objective	Policy Directions			
	1	2	3	4
SA1 (housing)	?	0	0	0
	Uncertain whether this option would affect housing delivery. Targets may be met through development of brownfield land and intensification in some parts of the Borough.	It is assumed that this option will not affect housing delivery.	It is assumed that this option will not affect housing delivery.	It is assumed that this option will not affect housing delivery.
SA2 (crime)	0	0	0	0
	None of the policy direction options are likely to affect crime and fear of crime.			
SA3 (health)	+	++/+	++	+
	Maintaining Green Belt, Metropolitan Open Land and/or open space areas, could have an indirect positive effect on health and wellbeing of residents, providing space for recreation and access to the natural environment.	Creating more open spaces within the Borough will help to improve the standard of health and wellbeing of the Borough's residents. These green spaces will need to be easily accessible for everyone and should help people to lead healthy lifestyles.	Providing more green spaces, sports facilities and play areas will significantly help to improve the health and wellbeing of residents, facilitating healthy lifestyles.	Enhancing biodiversity and protecting ecological sites could have an indirect positive effect on health and wellbeing of residents.

Table C.9: Protecting and enhancing the Environment

SA Objective	Policy Directions			
	1	2	3	4
SA4 (community cohesion and access to facilities)	0	+	++	0
	Unlikely to affect community cohesion	Creating more open spaces within the Borough will help to improve community cohesion, providing access to recreation space.	Providing more green spaces, sports facilities and play areas will significantly contribute to community cohesion.	Unlikely to affect community cohesion
SA5 (sustainable transport access)	0	+	+	0
	Unlikely to affect access by sustainable transport	Should result in open space within walking distance of residents in new developments, and could also possibly benefit neighbouring residents too.	Should result in new or enhanced outdoor sports facilities, playing pitches and child play areas within walking distance of residents in new developments, and could also possibly benefit neighbouring residents too.	Unlikely to affect access by sustainable transport
SA6 (waste)	0	0	0	0
	None of the policy direction options are likely to affect waste reduction and resource efficiency.			
SA7 (greenhouse gas emissions)	0	0	0	0
	None of the policy direction options are likely to affect greenhouse gas emissions.			
SA8 (energy)	0	0	0	0
	None of the policy direction options are likely to affect energy conservation.			
SA9 (air quality)	+	+	+	+/?
	Protecting valuable green/open spaces from development will help to maintain current air quality.	Providing more open spaces within new developments will help to improve air quality.	Providing more green spaces and recreational facilities will help to improve air quality.	Improving the health of the Borough's trees and woodlands may contribute to better air quality
SA10 (water)	0	0	0	+

Table C.9: Protecting and enhancing the Environment

SA Objective	Policy Directions			
	1	2	3	4
	Not likely to affect water quality or water use.			Working to protect the biodiversity and habitats, may subsequently help to improve water quality.
SA11 (climate change resilience)	+	+	+	+/?
	Leaving green spaces helps to support ground infiltration, and works to help to reduce the impact of flooding.	Providing more open spaces within new developments, will help to support ground infiltration and reduce surface runoff.	Providing more open spaces will help to support ground infiltration and reduce surface runoff.	Protecting the Borough's biodiversity may help some species to build resilience to climate change.
SA12 (soils and geological resources)	+	0	+	+
	Avoiding development of green spaces, works positively to maintain soil quality.	Not likely to affect soil quality and geological resources.	Providing more open spaces will help to protect soil quality.	The protection of species and habitats may work positively to protecting soil quality.
SA13 (biodiversity)	++	++	+	++
	Resisting development of green spaces works positively to protect the Borough's biodiversity.	Providing more green spaces within developments will encourage new habitats. Developments could incorporate features such as bird and bat boxes, to encourage wildlife to the new sites.	Providing more green spaces within developments will encourage new habitats. Developments could incorporate features such as bird and bat boxes, to encourage wildlife to the new sites. Sports grounds may need mitigation to minimise the impact of light pollution from flood lighting.	Actively working to protect and enhance biodiversity with the Borough, will make a significant contribution to this objective.
SA14 (integrity of SSSI and Natura 2000 sites)	0	0	0	++
	Does not specifically work towards the protection of SSSI or Natura Sites			Working to protect the Natura and SSSI sites and their unique biodiversity significantly contributes to this objective.

Table C.9: Protecting and enhancing the Environment

SA Objective	Policy Directions			
	1	2	3	4
SA15 (green belt and open space areas)	+	++	++	++
	Resisting development of green/open spaces will help to maintain the quality of them. No improvements have suggested.	Incorporating new open spaces works positively towards this objective.	Providing new sports and recreational facilities will help to improve the quality of open spaces within the borough.	Working to improve biodiversity will work towards enhancing the Borough's green space.
SA16 (local distinctiveness)	0	0	0	0
	None of the policy direction options are likely to affect local distinctiveness.			
SA17 (historic environment)	0	0	0	0
	None of the policy direction options are likely to affect the historic built environment.			
SA18 (town centres)	0	0	++/?	0
	Not likely to affect the vitality and viability of town centres.		Providing more open spaces, sports and recreational facilities within town centres will help to improve viability.	Not likely to affect the vitality and viability of town centres.
SA19 (economy)	0	0	0	0
	None of the policy direction options are likely to affect the delivery of employment developments.			
SA20 (employment)	0	0	+	0
	Not likely to affect employment levels.		Providing more sports and recreational facilities may lead to the creation of new jobs.	Not likely to affect employment levels.
Mitigation and enhancement	<p>Mitigation: Resist development of Green Belt, Metropolitan Open Land and open spaces.</p> <p>Enhancements: Policy Option 4 could be clearer on the planned initiatives for protecting and enhancing the Borough's biodiversity.</p>			

Ensuring Climate Change Resilience

Potential policy directions:

1. Introducing more proactive interventions to enable a more sustainable, low carbon future for Waltham Forest e.g. strengthening district heating networks.
2. Encouraging active and sustainable transport within the Borough to support carbon dioxide and particulate reduction and promote air quality improvement.
3. Supporting sustainable design, materials and construction methods.
4. Working with utility companies and other stakeholders on ensuring water and energy efficiency.
5. Working with the Environment Agency and other stakeholders on flood impact and mitigation.

Table C.10: Ensuring Climate Change Resilience					
SA Objective	Policy Directions				
	1	2	3	4	5
SA1 (housing)	0	0	0	0	0
	Should not affect the delivery of housing developments to meet targets.				
SA2 (crime)	0	0	0	0	0
	None of the policy direction options are likely to affect crime.				
SA3 (health)	0	+	0	0	0
	Unlikely to affect health and wellbeing.	Reduction in particulates and overall improvements in air quality plus facilitation of more active transport modes will help to improve standards of health and wellbeing within the Borough.	Unlikely to affect health and wellbeing.		
SA4 (community cohesion and access to facilities)	0	0	0	0	0
	None of the policy direction options are likely to affect community cohesion and access to facilities.				

Table C.10: Ensuring Climate Change Resilience

SA Objective	Policy Directions				
	1	2	3	4	5
SA5 (sustainable transport access)	0	++	0	0	0
	Not likely to affect sustainable transport access.	More sustainable and active transport options will help to reduce the number of car journeys being made within the Borough which is a key issue for the Borough.	Not likely to affect sustainable transport access.		
SA6 (waste)	0	0	+	+	0
	Not likely to affect waste arisings and resource efficiency.		Sustainable design and construction and the sourcing of sustainable materials should result in less waste being generated.	This will help to ensure that properties use less resources in operation.	Not likely to affect waste arisings and resource efficiency.
SA7 (greenhouse gas emissions)	++	+	+	+	0
	Considering more proactive sustainable/low carbon initiatives should help to reduce greenhouse gas emissions.	More sustainable transport options would help to reduce greenhouse gas emissions.	Sustainable construction, and the use of more sustainable materials, will help to reduce greenhouse gas emissions and support future low carbon growth.	Improving the energy and water efficiency of buildings will work positively towards this objective.	Not likely to affect greenhouse gas emissions.
SA8 (energy)	+	+	+	+	0
	Introducing more sustainable/low carbon initiatives and delivering a low carbon future would conserve energy.	Should help to reduce energy use in transport	Adopting more energy efficient building designs will help to conserve energy.	Improving energy and water efficiency in the Borough will work positively towards this objective.	Not likely to affect energy conservation.
SA9 (air quality)	+	++	0	0	0
	Low carbon initiatives should be beneficial for air quality. LBWF require proposals for district heating networks, including	More sustainable and active transport options should help to reduce the number of car journeys being made within the Borough, and	Not likely to affect air quality.		

Table C.10: Ensuring Climate Change Resilience

SA Objective	Policy Directions				
	1	2	3	4	5
	those using CHP, to comply with the Mayor of London’s Sustainable Design and Construction SPD seeking “air quality neutral” standards with dispersion modelling to understand the impact and mitigate any potential air quality impacts, evidenced through the requirement for air quality assessments.	subsequently improve air quality which is a key issue for the borough.			
	0	+	+/?	+	0
SA10 (water)	Not likely to affect water quality or water use.	The use of more sustainable transport will help to reduce air particulates. This is likely to have an indirect, yet positive effect on water quality.	The incorporation of SUDs and rainwater harvesting should help to conserve water. However, there is no specific reference to these within the DoT document.	Improving the water efficiency of buildings will work positively towards this objective	Not likely to affect water quality or water use.
	0	0	+/?	+	+
SA11 (climate change resilience)	Not likely to affect flood risk or climate change resilience.		The incorporation of SUDs and rainwater harvesting would help to manage flood risk. However, there is not specific reference within the DoT document.	Option would help to improve climate change resilience, although this should be more specifically referenced in the options.	Option would help to manage flood risk and improve climate change resilience.
	0	0	0	0	+
SA12 (soils and geological resources)	Not likely to affect efficient use of land, soil and geological resources.				Mitigating flood risk may lead to less ground saturation and help to protect soil quality.

Table C.10: Ensuring Climate Change Resilience

SA Objective	Policy Directions				
	1	2	3	4	5
SA13 (biodiversity)	0	+	+/?	+	+
	Not likely to affect biodiversity and the natural environment.	The use of more sustainable transport may have an indirect, yet positive effect on biodiversity and the natural environment.	Sustainable buildings could incorporate design features such as green roofs, living walls and green spaces, which could help to enhance biodiversity. However, there is no specific reference within the DoT document.	Making efficient use of water and reducing water demand could have an indirect, beneficial effect on biodiversity and the natural environment.	Minimising the impact of flooding will help to protect vulnerable habitats and protect the natural environment.
SA14 (integrity of SSSI and Natura 2000 sites)	0	+	0	+	+
	Not likely to affect SSSI and Natura 2000 sites.	The use of more sustainable transport may have an indirect, yet positive effect on the conditions of the Borough's SSSI and Natura 2000 Sites.	Not likely to affect SSSI and Natura 2000 sites.	Making efficient use of water and reducing water demand could have an indirect, yet beneficial effect on some SSSI and Natura 2000 sites.	Minimising the impact of flooding could help to protect vulnerable habitats.
SA15 (green belt and open space areas)	0	0	0	0	0
	None of the policy direction options are likely to have an effect on the Green Belt or open space land.				
SA16 (local distinctiveness)	0	0	0	0	0
	Not likely to affect local distinctiveness		Sustainable design should not necessarily affect local distinctiveness, particularly if delivered in line with other planning policies such as in relation to Creating High Quality Places.	Not likely to affect local distinctiveness	

Table C.10: Ensuring Climate Change Resilience

SA Objective	Policy Directions				
	1	2	3	4	5
	-	0	-	-	0
SA17 (historic environment)	New initiatives could be intrusive and detract from the built historic environment. Mitigation would be needed to ensure that this is carried out sensitively, such as in relation to Creating High Quality Places and heritage protection.	Not likely to affect the historic built environment	New modern building designs may detract from the built historic environment. Mitigation would be needed to ensure that this is carried out sensitively, such as in relation to Creating High Quality Places and heritage protection.	Historic buildings are likely to be less efficient than more modern buildings, so this policy could help to provide greater efficiency, however, mitigation would be needed to ensure that energy efficiency modifications were carried out sensitively.	Not likely to affect the historic built environment
	0	+	0	0	0
SA18 (town centres)	Not likely to affect town centre viability and vitality.	Providing more sustainable transport options could help to bring more people into the Borough's town centres.	Not likely to affect town centre viability and vitality.		
	0	+	0	0	0
SA19 (economy)	Not likely to affect delivery of employment developments.	Not likely to affect delivery of employment developments. However, linking sustainable transport options with employment areas works positively toward achieving this objective. Developments would need to be appropriately located.	Not likely to affect delivery of employment developments.		

Table C.10: Ensuring Climate Change Resilience

SA Objective	Policy Directions				
	1	2	3	4	5
	0	0	0	0	0
SA20 (employment)	None of the policy direction options are likely to affect employment levels.				
Mitigation and enhancement	<p>Mitigation: Mitigation will be needed to ensure that development is sensitive to the historic built environment, relating to options 1, 3 and 4.</p> <p>Enhancement: The policy options should include the need to ensure greater resilience to climate change through the design of new developments. Words could be added to Option 1: “Introducing more proactive interventions to enable a more sustainable, low carbon future for Waltham Forest e.g. strengthening district heating networks <i>and improving resilience to climate change.</i>” The incorporation of SUDs, rainwater harvesting, green roofs, living walls and green spaces could be referenced within the DoT document.</p> <p>The policy direction options could go further to promote zero carbon design which could bring significant positive effects to the Borough with respect to energy conservation and greenhouse gas emissions.</p>				