

**London Borough of Waltham Forest
Proposed Submission Local Plan Part 1 (Regulation 19)
Sustainability Appraisal Report**

Appendix D: Direction of Travel Options Assessment



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London Borough of Waltham Forest Local Plan Sustainability Appraisal

Appraisal of the 'Direction of Travel' Document

London Borough of Waltham Forest Local Plan Sustainability Appraisal

A report by CAG Consultants

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Summary

The options set out within the Direction of Travel document have been subject to a Sustainability Appraisal (SA) and Habitats Regulations (HRA) Screening exercise.

The options consist of six strategic growth options and between four and seven potential policy directions for ten policy topics, set out under two headings as follows:

Direction of Travel Options Appraised	
Strategic growth options:	
<ul style="list-style-type: none"> • Option 1: Developer Led; • Option 2: Key Growth Areas; • Option 3: Growth Hubs; • Option 4: Town Centres; • Option 5: Combined Approach; and • Option 6: Exceptional Circumstances. 	
Policy topics:	
<ul style="list-style-type: none"> • Decent Homes for Everyone; • Building a Resilient Economy; • Providing Physical Infrastructure; • Meeting Social and Community Infrastructure Needs; • Distinctive Town Centres and High; • Growing Our Culture and Visitor Attractions; • Creating High Quality Places; • Enhancing and Preserving our Heritage; • Protecting and Enhancing our Environment; and • Ensuring Climate Change Resilience. 	

Potential sustainability effects have been identified against a set of 20 Borough-specific sustainability objectives, with reference to the following definitions:

Table Summ.1: Definitions of Significance

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

Symbol	Definitions of Significance of Effects Against the SA Objectives
?	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

The potential significant sustainability effects of the strategic growth options and the potential policy directions are presented in the following tables. The tables only present the potential significant effects; the options may also result in minor negative or minor positive effects. Full details on the assessment are contained in the main body of the report.

With regards to the HRA screening exercise, Likely Significant Effects (LSEs) on Natura 2000 sites have been identified in relation to some options and these would need to be considered further at a later date if these options are taken forward into the Local Plan.

Table Summ.2: Potential Significant Sustainability Effects of the Strategic Growth Options

Option	Potential Significant Effects
Option 1: Developer-Led	Potential significant negative effects are identified in relation to SA4 (community cohesion and access to community facilities), SA5 (sustainable transport access), SA9 (Air Quality) and SA14 (integrity of SSSI and Natura sites).
Option 2: Key Growth Areas	Potential significant negative effects are identified in relation to SA9 (air quality) and SA14 (integrity of SSSI and Natura 2000 sites). Uncertain effects are identified in relation to the following SA objectives: SA11 (flood risk and climate change resilience), SA12 (efficient use of land), SA15 (green belt and open space), and SA18 (supporting town centres).
Option 3: Growth Hubs	The impact to SA4 community cohesion could be significant and positive, but remains uncertain at this stage. Uncertain effects are identified in relation to a number of SA objectives: SA2 (crime), SA3 (health), SA4 community cohesion, SA7 (greenhouse gas emissions), SA11 (flood risk and climate change resilience), SA12 (efficient use of land), SA13 (biodiversity and the natural environment), SA17 (historic environment) and delivery of employment land (SA19). An uncertain effect is also identified in relation to Natura 2000 sites (SA14).
Option 4: Town Centres	A potential significant positive effect is identified in relation to improving the vitality and viability of town centres. A potential uncertain effect is identified in relation to SA14 due to the proximity of Wood Street town centre to Epping Forest SSSI and SAC site. Uncertain effects are

Option	Potential Significant Effects
	also identified in relation to SA3 (health), SA7 (greenhouse gas emissions), and SA8 (energy conservation).
Option 5: Combined Approach	<p>Significant positive effects are identified in relation to improving vitality and viability of town centres (SA18) and in relation to the delivery of housing (SA1). The impact to SA4 community cohesion could be significant and positive, but remains uncertain at this stage.</p> <p>A potential significant negative effect is identified in relation to SA14 (integrity of SSSI and Natura sites).</p> <p>Uncertain effects are identified in relation to SA7 (greenhouse gas emissions), and SA11 (flood risk and resilience to climate change).</p>
Option 6: Exceptional Circumstances	<p>A potential positive significant effect (with some uncertainty) is identified in relation to the delivery of housing (SA1).</p> <p>A potential significant negative effect is identified in relation to the loss of Green Belt and MOL land (SA15).</p> <p>Potential uncertain significant negative effects are also identified for SA12 in relation to the inefficient use of land and loss of soil and geological resources.</p> <p>There are also a number of uncertain effects of this option such as in relation to effects on the water environment (SA10), energy (SA8), flood risk / climate change resilience (SA11), biodiversity (SA13) and ecological sites (SA14). In addition, uncertain minor negative effects on air quality (SA9), greenhouse emissions (SA7) and the historic environment (SA17) are recorded in the appraisal.</p>

Table Summ.3: Potential Significant Sustainability Effects of the Policy Direction Options

Option	Potential Significant Effects
Decent Homes for Everyone	
<p>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.</p>	<p>Potential significant negative and uncertain effects have been identified in relation to in relation to waste (SA6), greenhouse gas emissions (SA7), conserving energy (SA8), improving air quality (SA9), water (SA10), climate change resilience (SA11), biodiversity (SA13), SSSI and Natura 2000 sites (SA14), open space / green belt land (SA15), and the historic environment (SA17).</p> <p>Uncertain effects are identified in relation to Community cohesion and access to community facilities (SA4) and Sustainable transport Access (SA5).</p>
<p>2. Supporting and encouraging the delivery of affordable housing.</p>	<p>No potential significant effects identified.</p>
<p>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.</p>	<p>No potential significant effects identified.</p>
<p>4. Supporting a mixture of housing tenures (e.g. London Living Rent, London Affordable Rent) and unit sizes including family accommodation</p>	<p>No potential significant effects identified.</p>
<p>5. Continuing to protect the Borough's housing stock from inappropriate conversion to flats or Homes in Multiple Occupation.</p>	<p>No potential significant effects identified.</p>
<p>6. Safeguarding existing gypsy and traveller sites (Peacock Close, Folly Lane) and considering future needs.</p>	<p>No potential significant effects identified.</p>
Building a Resilient Economy	
<p>1. Supporting the retention of existing employment floor space and jobs.</p>	<p>No potential significant effects identified.</p>

Option	Potential Significant Effects
2. Promoting more office space development within accessible locations.	The appraisal recorded some uncertain potential significant negative effects resulting from development, such as in relation to local greenhouse gas emissions (SA7), local distinctiveness (SA16), the historic (SA17) and natural environment and biodiversity (SA13), energy use (SA8), greenhouse gas emissions (SA9), waste arisings (SA6).
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.	The appraisal recorded some uncertain potential significant negative effects resulting from development, such as in relation to greenhouse gas emissions (SA7), local distinctiveness (SA16), the historic (SA17) and energy use (SA8).
4. Promoting employment uses as part of mixed use schemes.	No potential significant effects identified.
5. Supporting the delivery of affordable and connected workspace.	No potential significant effects identified.
6. Encouraging the development of creative enterprise zones.	No potential significant effects identified.
7. Supporting the delivery of employment training opportunities through the planning system.	No potential significant effects identified.
Providing Physical Infrastructure	
1. Supporting the delivery of digital infrastructure in the Borough.	No potential significant effects identified.
2. Supporting the delivery of required utilities in the Borough.	Uncertain negative effects could potentially occur in relation to heritage assets (SA17) and the natural environment (SA13) but effects would be dependent on the location and nature of any developments proposed.

Option	Potential Significant Effects
3. Ensuring sufficient waste sites within the Borough and opportunities to improve them.	Potential uncertain negative effects are also identified if new waste sites are developed in relation to heritage assets (SA17) and the natural environment (SA13) but effects would be dependent on the location and nature of any developments proposed.
4. Supporting the delivery of on-site utilities and waste facilities on major sites.	No potential significant effects identified.
5. Ensuring residents have access to sustainable and accessible transport.	No potential significant effects identified.
6. Supporting transport improvements that increase capacity, and improve user experience.	Potential uncertain significant negative effects could occur in relation to the loss of soil resources (SA12) and generation of construction waste (SA6). Potential uncertain minor negative effects are also recorded in relation to biodiversity and the natural environment (SA13), integrity of SSSI and Natura 2000 sites (SA14) and heritage assets (SA17) but effects would be dependent on the location and nature of any developments proposed.
Meeting Social and Community Infrastructure Needs	
1. Safeguarding all existing social and community infrastructure facilities including educational and health.	Potential significant positive effects have been identified in relation to health and wellbeing (SA3) and community cohesion (SA4).
2. Supporting the intensification of existing social and community infrastructure facilities.	Potential significant positive effects have been identified in relation to health and wellbeing (SA3) and community cohesion (SA4).
3. Encouraging social and community infrastructure facilities as part of residential or other mixed use development schemes.	Potential significant positive effects have been identified in relation to health and wellbeing (SA3) and community cohesion (SA4). Uncertain effects have been identified in relation to the natural environment (SA13). New development could result in negative effects on the natural environment but the risk depends on the sites chosen and nature of development.
4. Allocating new sites for social and community infrastructure facilities e.g. hubs of health and care facilities.	Potential significant positive effects have been identified in relation to health and wellbeing (SA3) and community cohesion (SA4). Potential uncertain effects are identified with relation to SA3 (health), SA13 (biodiversity) and SA18 (town centres).
5. Ensuring social and community infrastructure facilities are located within reasonable walking distance of new and	Potential significant positive effects have been identified in relation to health and wellbeing (SA3), community cohesion (SA4) and sustainable transport access (SA5).

Option	Potential Significant Effects
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.	Potential significant positive effects have been identified in relation to health and wellbeing (SA3), and community cohesion (SA4).
Distinctive Town Centres and High Streets	
1. Maintaining the existing town centre and high street retail hierarchy, including continuing to promote Walthamstow as the major town centre in the Borough.	No potential significant effects identified.
2. Supporting opportunities for new areas for retail and non-retail uses in growth areas, including Lea Bridge and Blackhorse Lane.	No potential significant effects identified.
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.	No potential significant effects identified.
4. Supporting and promoting café, restaurant and night time/ evening economy uses in designated centres.	An uncertain effect is identified in relation to crime (SA2).
5. Proactively managing vacant floor space in the designated centres by supporting and promoting pop-up and meanwhile uses where appropriate.	Uncertainty is recorded in the appraisal in relation to whether any social benefits would result from the option (SA4). This would depend on the nature of the 'meanwhile' and pop-up uses / businesses.
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.	It is uncertain whether creating distinctive retail centres will bring social / community benefits (SA4) and it is uncertain whether specialisation of retail in certain parts of the Borough would reduce accessibility (SA5) and affect local distinctiveness (SA16).
Proactively managing the proliferation of particular types of activities likely to make people unhealthy e.g. betting shops and hot food takeaway shops.	No potential significant effects identified.

Option	Potential Significant Effects
Growing Our Culture and Visitor Attractions	
1. Supporting the development of the cultural and creative sectors through grouping of such activities at appropriate locations e.g. cultural clusters or quarters.	An uncertain minor positive effect is identified because this option could support the vitality of town centres (SA18). An uncertain effect is identified (SA4) because it is uncertain whether clustering cultural facilities / attractions would increase access to such facilities for residents. It could reduce access to new facilities if these were clustered in a limited number of places across the Borough. It is uncertain that creating clusters would increase access by sustainable transport modes (SA5). Clusters should be directed to locations with good sustainable transport access.
2. Encouraging the provision of community spaces for local events and festivals.	No potential significant effects identified.
3. Promoting cultural uses in designated centres e.g. galleries and performance spaces.	No potential significant effects identified.
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.	No potential significant effects identified.
5. Supporting the provision of visitor accommodation within the Borough.	An uncertain minor positive effect is identified because the option could increase air pollution from transport, depending on where new visitor accommodation is located in the Borough (SA9).
6. Supporting a thriving evening economy across the Borough.	No potential significant effects identified.
7. Working to secure more public art and culture through planning obligations.	No potential significant effects identified.
Creating High Quality Places	

Option	Potential Significant Effects
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.	There is some uncertainty surrounding SA17 (historic built environment) and without policy direction option 5, this option could lead to some new developments not respecting local character and distinctiveness.
2. Promoting active living environments through connectivity and walkability in and between developments.	An uncertain minor positive effect has been identified in relation to biodiversity and the natural environment, as it is not certain that more green spaces would be created.
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.	Potential significant positive effects have been identified in relation to crime reduction (SA2).
4. Encouraging appropriate density, scale, massing and height in development to reflect the character, local distinctiveness, and context of the Borough.	A potential significant positive effect is identified in relation to promoting local distinctiveness (SA16).
5. Considering where tall buildings may be appropriate in the Borough.	No potential significant effects identified.
6. Ensuring places are designed to promote positive amenity impacts and support the health and wellbeing of residents.	A potential significant positive effect has been identified in relation to health and wellbeing (SA3), as this option aims to create well designed places that promote improved access to amenities, whilst also supporting the health and wellbeing of the Borough's residents.
Enhancing and Preserving our Heritage	
1. Ensuring that new development respects heritage assets and their settings.	Potential significant positive effects are identified in relation to the conservation and enhancement of the historic built environment within the Borough (SA17).
2. Promoting heritage-led regeneration and seeking appropriate beneficial uses and improvements to historic buildings, spaces and areas.	Potential significant positive effects are identified in relation to the conservation and enhancement of the historic built environment (SA17) as well as the local distinctiveness and character of the Borough (SA16).

Option	Potential Significant Effects
3. Promoting and encouraging access to the Borough's unique heritage offer as part of its arts and culture programme.	Potential significant positive effects are identified in relation to the conservation and enhancement of the historic built environment (SA17) as well as the local distinctiveness and character of the Borough (SA16).
4. Encouraging the restoration of heritage assets at risk or under threat.	Potential significant positive effects are identified in relation to the conservation and enhancement of the historic built environment (SA17) as well as the local distinctiveness and character of the Borough (SA16).
Protecting and Enhancing our Environment	
1. Continuing to resist the inappropriate loss of the Green Belt, Metropolitan Open Land and open spaces.	There is some uncertainty as to whether housing targets will be met through development outside of Green Belt, Metropolitan Open Land or open space areas and an uncertain effect is therefore identified for SA1. Significant positive effects have been identified in relation to biodiversity and the natural environment (SA13).
2. Supporting the provision of new open space in new development proposals.	Significant positive effects have been identified in relation to biodiversity (SA13), health and wellbeing (SA3) and SA15 (maintain and enhance the quality of the green belt and open space areas).
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.	Potential significant positive effects have been identified in relation to green belt and open spaces (SA15), community cohesion (SA4), and health and wellbeing (SA3). A potential uncertain significant positive effect has been identified in relation to town centre viability (SA18), as the provision of new open green spaces would depend on the on the results of the call for sites process.
4. Protecting and enhancing the Borough's biodiversity, especially where habitats, species and sites are recognised at international, national, regional and local level.	Potential significant positive effects have been identified in relation to greenbelts and open spaces (SA15), SSSI and Natura sites (SA14) and biodiversity (SA13). Some uncertain minor positive effects have been identified with regards to air quality (SA9), and climate change resilience (SA11). The effect of these policies on the SA objectives are dependent upon the initiatives selected.

Option	Potential Significant Effects
Ensuring Climate Change Resilience	
1. Introducing more proactive interventions to enable a more sustainable, low carbon future for Waltham Forest e.g. strengthening district heating networks.	Potential significant positive effects have been identified with regard to reduction of greenhouse gas emissions (SA7).
2. Encouraging active and sustainable transport within the Borough to support carbon dioxide and particulate reduction and promote air quality improvement.	Potential significant positive effects have been identified with regards to air quality (SA9) and sustainable accessibility (SA5).
3. Supporting sustainable design, materials and construction methods.	There are some uncertainties regarding the type of sustainable design features incorporated within developments (SA10, SA11 and SA13), and further details would be needed when a policy is drafted to determine the overall effect of the policy.
4. Working with utility companies and other stakeholders on ensuring water and energy efficiency.	No potential significant effects identified.
5. Working with the Environment Agency and other stakeholders on flood impact and mitigation.	No potential significant effects identified.

1 Introduction

1.1 Background

London Borough of Waltham Forest (LBWF) is in the process of preparing an updated Local Plan to guide development in the Borough.

LBWF adopted its Local Plan Core Strategy in March 2012, setting out a broad policy framework. The Development Management Policies Local Plan was adopted in October 2013, which provided detail on strategic policies in the Core Strategy.

The new Local Plan, when adopted, will replace the Core Strategy and the Development Management Policies Local Plan. A new Local Plan is needed as the population in Waltham Forest is expected to grow by 24% by 2033. The Council has aspirations for growth, including significant new housing and sustained economic growth, to provide jobs for local people and increase the supply of housing, including affordable units.

The Direction of Travel document is the first stage in the engagement process with residents, businesses and other stakeholders on what the new Local Plan should contain. It presents the challenges and opportunities for the Borough and presents a Vision for Waltham Forest, looking ahead to what the Borough will be like in 15 to 20 years' time.

The Direction of Travel document presents options for consultation. The options comprise six strategic options for development in the Borough and a number of policy direction options being considered under ten topics.

1.2 This Document

This document presents the findings of a Sustainable Appraisal (SA) of all of the options set out by the Direction of Travel document. This report presents the potential environmental, social and economic effects of all the options considered to date. It therefore provides information for the public and other stakeholders to inform their responses to consultation on the Direction of Travel document.

This report also identifies any likely significant effects on Natura 2000 sites which could result from the strategic options or the policy direction options, as a part of the parallel Habitats Regulations Assessment (HRA).

1.3 Sustainability Appraisal and Strategic Environmental Assessment

SA of Local Plans is required under Section 19 of the Planning and Compulsory Purchase Act 2004. The National Planning Policy Framework (March 2012) also requires SA of Local Plans. The SA must incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations). The SEA Regulations transpose the SEA Directive (2001/42/EC) into English law and applies to a range of plans and programmes, including Local Plans. The SEA Directive aims at a high level of protection of the environment, and to integrate the consideration of the environment into the preparation and adoption of plans and with a view to promoting sustainable development.

Within the context of local planning in England, it is accepted practice to integrate the requirements of SA and SEA in to a single assessment process, as set out in the [Planning Practice Guidance](#) (updated 2014). The purpose of SA is to appraise the environmental, social and economic effects of plans and programmes. The SA 'testing' of the Local Plan policies and their reasonable alternatives will help to develop the most sustainable policies and proposals as an integral part of the plan's development.

1.4 Habitats Regulations Assessment

In the UK, the Habitats Directive (92/43/EEC) has been transposed into domestic legislation as the Habitats Regulations 2010 which requires an assessment of any plans which are likely to have a significant effect on any protected European sites, i.e. Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar wetland sites. This is commonly referred to as a Habitats Regulations Assessment (HRA). This requirement includes strategic plans with an impact on land use.

For the Waltham Forest Local Plan an HRA screening exercise will be undertaken to determine if the emerging planning policies (either in isolation and/or in combination with other plans or projects) would generate an adverse impact upon the integrity of a European site, in terms of its conservation objectives and qualifying interests. This process will be documented in a Screening Report that will be submitted to Natural England for approval. Any potential effects from the Local Plan on European sites will be included within the SA and reported in the SA Reports.

2 Methodology

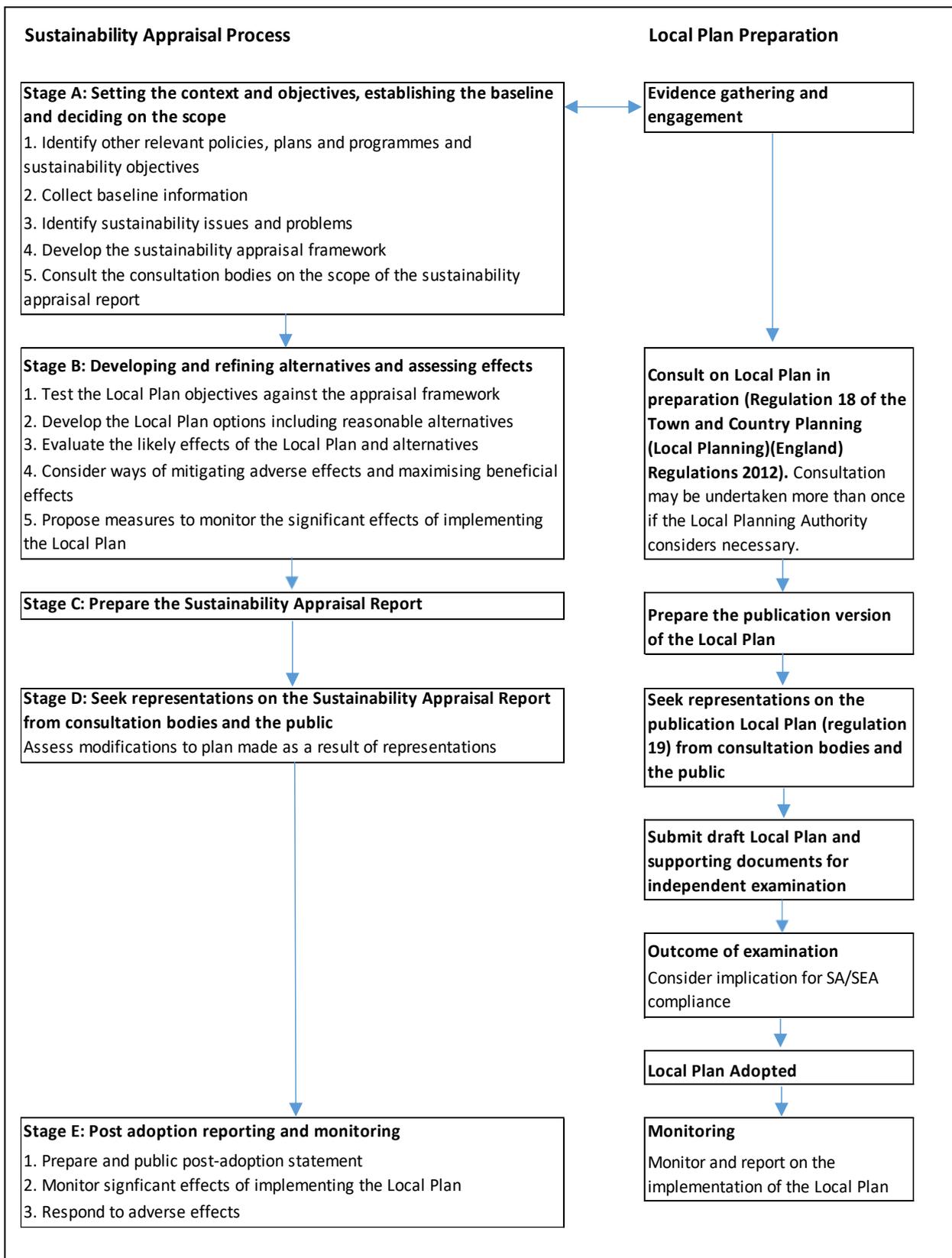
2.1 Introduction

The SA process is shown in Figure 2.1. The appraisal of the Direction of Travel document is a part of Stage B of the SA process (developing and refining reasonable alternatives and assessing effects) and fulfils the requirements to identify, describe and evaluate the likely significant effects on the environment of “*reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme*¹”.

Stage A of the SA, which sets the scope of the appraisal and determines how it will be undertaken, has been completed. A Scoping Report has been consulted on with statutory consultees and a final version of the Scoping Report is available at: <https://www.walthamforest.gov.uk/content/planning-policy-consultations>

¹ SEA Regulations (Environmental Assessment of Plans and Programmes Regulations 2004) (Reg 12 (1(b)))

Figure 2.1: The SA process



(Source: Adapted from Department for Communities and Local Government (2014) Planning Practice Guidance)

2.2 What has been appraised?

The options set out within the Direction of Travel document have been appraised in order to identify their potential effects. These are listed below:

Strategic growth options

Option 1. Developer-Led

“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).”

Option 2. Key Growth Areas

“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.”

Option 3. Growth Hubs

“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.”

Option 4. Town Centres

“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.”

Option 5. Combined Approach

“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.”

Option 6. Exceptional Circumstances

“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.”

A number of assumptions have been made in order to assess the strategic growth options and these are set out in Annex B with the detailed appraisal tables.

Policy direction options

Four to seven policy direction options are being considered by LBWF for ten different topic areas. The topic areas are listed below. The policy direction options are listed above each appraisal table (C.1 to C.10) within Annex C:

- Decent Homes for Everyone;
- Building a Resilient Economy;
- Providing Physical Infrastructure;

- Meeting Social and Community Infrastructure Needs;
- Distinctive Town Centres and High;
- Growing Our Culture and Visitor Attractions;
- Creating High Quality Places;
- Enhancing and Preserving our Heritage;
- Protecting and Enhancing our Environment; and
- Ensuring Climate Change Resilience.

2.4 How was the appraisal undertaken?

The scoping process reviewed a large amount of data about the Borough and through this review, a set of key sustainability issues were identified for the Borough. The issues were then organised into a set of 20 SA Objectives called the 'SA Framework', against which to test the Local Plan as it develops. The SA Framework is set out in Table 2.1. The key sustainability issues are presented in Annex A; these were referred to during the assessment of the options as per the criteria for significance.

Considering different options for strategic growth and the Local Plan policies is a key part of the development of the Local Plan and the SA plays a role in presenting the sustainability implications of each of the options considered, informing consultees and decision-making at each stage in the plan-making process.

Table 2.1: Sustainability Appraisal Framework

SA Objectives (against which to test the Plan and options)
SA1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings
SA2. Reduce crime and the fear of crime
SA3. Improve standard of health and wellbeing of those who live and work in the Borough
SA4. Improve community cohesion and reduce inequalities through the provision of community facilities to meet local cultural, educational, recreational and social needs
SA5. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system, reducing car use for all journey lengths
SA6. Prevent production of waste, improve resource efficiency and increase recycling and recovery
SA7. Reduce greenhouse gas emissions and promote low carbon growth
SA8. Conserve energy
SA9. Improve air quality
SA10. Improve water quality in rivers and groundwater and ensure the efficient use of water resources
SA 11. Reduce the risk of flooding and improve resilience to climate change
SA12. Ensure the efficient use of land and buildings and protect soil quality and geological resources
SA13. Conserve and enhance biodiversity and the natural environment, improving resilience to climate change
SA14. Protect the ecological integrity of SSSI and Natura 2000 sites
SA15. Maintain and enhance the quality of the green belt and open space areas
SA16. Maintain and improve local distinctiveness
SA17. Conserve and enhance the historic built environment
SA18. Maintain and enhance the vitality and viability of the Borough's town centres
SA19. Improve the local economy by enabling employment developments in appropriate places
SA20. Maintain stable levels of employment in the Borough

Each option has been considered against all of the SA Objectives and this is presented in tables in Annexes B (strategic growth options) and Annex C (potential policy directions). For each SA Objective, potential effects have been identified using the notation set out in Table 2.2.

Table 2.2: Significance

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

The appraisal of options at this stage in the plan-making process is strategic, mainly theoretical and in most cases, largely non-spatially specific. Therefore, it is not possible for the appraisal of options to be detailed with regards to the nature of potential effects. However, where it has been possible and helpful for decision-making, the appraisal has made reference to details of the nature of effects, as defined in Table 2.3. This has been possible in the appraisal of the strategic options but to a lesser extent in the appraisal of the potential policy direction options.

A number of assumptions have been made in the appraisals of the options and these are listed within the detailed appraisal tables in Annexes B and C.

Table 2.3: Nature of Potential Effects Definitions

Effect	Definition
Cumulative Effects	Cumulative effects arise, for instance, where several developments each have insignificant effects but together have a significant effect; or where several individual effects of the plan (e.g. noise, dust and visual) have a combined effect. Includes synergistic effects where interactions produce a total effect greater than the sum of the individual effects. Cumulative effects are also taken to mean 'in-combination effects' under the Habitats Directive / Regulations, where other plans or projects in combination with a plan might affect Natura 2000 sites.
Direct / Indirect	Distinguishes between effects that are a direct result of the development / policy (e.g. land loss) or are secondary i.e. they occur away from the original effect or as a result of a complex pathway.
Duration	Short term: 0 – 5 years; Medium term: 5 - 12 years (e.g. beyond short term and up to the end of the plan period); Long-term: 12+ years (e.g. beyond the end of the plan period)

Frequency	Described in this report as either: Continual; or Defined by number of occurrences (e.g. per annum); or Intermittent.
Irreversible	The receptor would require significant intervention to return to (future) baseline condition, e.g. development of greenfield land for housing developments.
Magnitude	High 80%+ receptor or environmental capacity affected; Medium 40-80% of receptor or environmental capacity of affected; Low 20-40% of receptor or capacity affected
Permanent	Lasting or intended to last or remaining unchanged indefinitely e.g. development of land for housing or continual effects from traffic
Probability	Low: 20-40% e.g. not likely that a receptor will be affected or effect will occur based on available evidence; Medium: 40-80%; High: >80% e.g. highly likely that a receptor will be affected or effect will occur based on available evidence.
Reversible	The receptor can return to (future) baseline condition without significant intervention, e.g. management or operational measures.
Spatial extent	Local – Effects contained to within the Borough; Sub-Regional - Effects extend beyond the Borough into neighbouring districts/boroughs; Regional - Effects extend beyond the Borough into the rest of the GLA area; National - Effects within England or the UK but extending beyond region; International / Transboundary - Effects extending beyond the UK

2.5 HRA screening

The first stage of an HRA is screening to identify Likely Significant Effects (LSEs) on Natura 2000 sites. It is not legally necessary to screen plan options for LSEs on Natura 2000 sites but it is considered good practice.

Consultation has been undertaken with Natural England to agree the Natura 2000 site which need to be considered in the HRA². These sites are:

- Epping Forest SAC;
- Lee Valley SPA and the Lee Valley Ramsar site; and
- Wormley-Hoddesdonpark Woods SAC.

In the appraisal of options, SA Objective 14 'Protect the ecological integrity of SSSI and Natura 2000 sites' has identified potential effects on the Natura 2000 sites. The likely significant effects of the options recorded in the appraisals are reported in Section 4 of this report.

² Email received from Natural England representative agreeing this scope of the HRA dated 15th August 2017

3 Sustainability Effects of the Options

3.1 Introduction

This section presents the sustainability effects of the options and provides commentaries on their relative performance in the appraisals. Potential significant effects have been identified in **bold text** and they also include uncertain effects. Reference is made to the objectives within the SA Framework where appropriate (e.g. SA1, SA2, etc). An overall summary is provided for each of the strategic growth options or groups of potential policy direction options under the specific topics.

3.2 Sustainability Effects of the Strategic Options

Option 1: Developer-Led

A developer-led or market-led approach provides minimal ability to strategically and spatially address negative cumulative impacts and promote positive cumulative impacts. Both positive and negative impacts will be dealt with primarily at the project level. There is the potential for a number of issues, particularly in delivering sustainable transport infrastructure which has indirect implications for wellbeing, air quality, and greenhouse gases. Epping Forest SAC, parts of which are located within the Borough, could be adversely affected by a further reduction in air quality resulting from this option. Strategic spatial land use planning will be limited in this option, e.g. directing the efficient use of land and enabling development in appropriate locations. Housing provision is likely to come forward quickly, but the range of tenures and sizes will be determined on a project level, which is likely to make it difficult to provide a good range of housing to meet needs. A number of sustainability issues in the Borough, such as socio-spatial inequalities, the delivery of social infrastructure, a need for increased sustainable transport, and poor air quality, evidence a requirement for strategic interventions.

The appraisal mainly records minor negative effects for this option. **Potential significant negative effects are identified in relation to SA4 (community cohesion and access to community facilities), SA5 (sustainable transport access), SA9 (Air Quality) and SA14 (integrity of SSSI and Natura sites).**

Option 2: Key Growth Areas

Intensification and possible expansion of current Key Growth Areas has benefits arising from targeting growth towards developed areas, which should avoid significant direct negative impacts to green spaces and soil resources, and is an efficient use of land and buildings (assuming avoidance of impacts to open spaces within these areas). It also builds on previous successes in the Key Growth Areas, such as for employment, sustainable transport infrastructure, townscape viability and vitality, and access to green space. Focusing development towards existing key transport areas such as these should have air quality and greenhouse gas benefits. Despite investment in these areas there remain issues which further investment could help to address, such as crime and social deprivation.

Further development in these areas will require intensification, likely to be in the form of tall buildings. Tall buildings present impacts to townscape and setting impacts to historic buildings. They also provide a narrow range of tenure and size for new dwellings which may not meet the needs of families.

A number of protected sites (SSSI, SAC) are within or near to the Key Growth Areas and are not in a favourable condition. The impacts of intensification of use on these sites would need to be carefully considered in the HRA and at subsequent stages. Direct negative impacts may also occur with relation

to cultural heritage sites and these would require further consideration at subsequent stages of Local Plan preparation.

None of the Key Growth Areas are located in the North of the Borough, which means this option will not address the sustainability issues in the North of the Borough, and the SA objectives of reducing inequalities, improving air quality and greenhouse gas emissions.

Potential significant negative effects are identified in relation to SA9 (air quality) and SA14 (integrity of SSSI and Natura 2000 sites).

Uncertain effects are identified in relation to the following SA objectives: SA11 (flood risk and climate change resilience), SA12 (efficient use of land), SA15 (green belt and open space), and SA18 (supporting town centres).

Option 3: Growth Hubs

Overall there are a number of possible benefits from Growth Hubs, including for meeting housing need, community cohesion, sustainable transport and enabling employment developments. This is derived from the flexibility of the option, which should help to address key needs in housing, community sites, and employment. The flexibility should also help to address socio-spatial inequalities. However, there is a risk of piecemeal development if not carefully managed.

As this option precludes development in existing Key Growth Areas, it would not build on any successes in those areas, and not facilitate further development where needed in those areas. It would also not support investment in town centres.

The option could have more positive impacts if other policy elements were specified, such as:

- Commitment to target areas with higher crime rates and where local distinctiveness could be enhanced;
- Provide links to open space; and
- Avoid direct impacts to areas at risk from flooding (Zones 2 and 3), biodiversity sites (designated and non-designated), and sites designated for cultural heritage, green belt and open space.

The assessment identifies a number of minor positive and uncertain effects. **The impact to SA4 community cohesion could be significant and positive, but remains uncertain at this stage.**

Uncertain effects are identified in relation to a number of SA objectives: SA2 (crime), SA3 (health), SA4 community cohesion, SA7 (greenhouse gas emissions), SA11 (flood risk and climate change resilience), SA12 (efficient use of land), SA13 (biodiversity and the natural environment), SA17 (historic environment) and delivery of employment land (SA19).

An uncertain effect is also identified in relation to Natura 2000 sites (SA14).

Option 4: Town Centres

This option provides a number of minor positive impacts, such as the provision of accessible transport, enabling employment, improvements in air quality, and efficiency of land use. This option provides a wider geographic spread than Option 2, but remains focused on town centre development. Therefore this option produces some of the benefits of targeted regeneration, as reflected in Option 2, but focuses on town centres rather than other Growth Hub areas.

Growth in the town centres targeted should promote additional housing development in a range of tenures and sizes, spread throughout the Borough. Given the high housing targets in the Borough, some intensification with tall buildings may be needed. Tall buildings are unlikely to produce a good a range of tenures and sizes. 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. This option is also likely to deliver a range of community facilities associated with housing and employment development throughout the Borough, in the town centres noted.

Commitment to development in accessible locations should translate into reduced car journeys and therefore improvements in greenhouse gas emissions. It is not clear if this option would promote low carbon growth and this would be dependent on other planning policies. A number of historic built environment sites (e.g. Conservation Areas and listed buildings) could be directly impacted by town centre development.

A potential significant positive effect is identified in relation to improving the vitality and viability of town centres.

A potential uncertain effect is identified in relation to SA14 due to the proximity of Wood Street town centre to Epping Forest SSSI and SAC site. Uncertain effects are also identified in relation to SA3 (health), SA7 (greenhouse gas emissions), and SA8 (energy conservation).

Option 5: Combined Approach

Intensification of development in current Key Growth Areas and Town Centres and designation of new Growth Hubs should result in positive effects from spatial distribution and targeted growth in existing developed areas. Directing development towards existing centres and Key Growth Areas is an efficient use of land and buildings and should help avoid substantial direct negative effects on environmental receptors. This option allows previous successes in the Key Growth Areas to be further developed, such as for employment generation, sustainable transport infrastructure, and access to open space. It should address areas where further investment is needed, such as to address crime and social deprivation and inequalities. Focusing development towards existing key transport areas should have air quality and greenhouse gas benefits.

The combination of options 2, 3 and 4 should provide greater spatial spread for development than any single option, which should help to address existing spatial disparities (such as in public transport and car journeys, as well as housing tenure), and avoid the risk of fragmented policy making and impacts associated with Growth Hubs singularly.

Some protected sites (SSSI, SAC) are within or near to the Key Growth Areas, and there may be other potentially negative biodiversity impacts within Town Centres and Growth Hubs. Direct negative impacts may also occur to with relation to Flood Zones and cultural heritage sites (e.g. Conservation Areas, and settings for listed buildings). The impacts of intensification of use on these historic assets will need to be carefully considered at subsequent stages, if this option is taken forward.

While the possibility exists for some direct negative effects, this option provides good flexibility for a strategic approach which targets sustainability issues. This presents the possibility of avoiding the impacts highlighted for options 2, 3, and 4, while maximising the benefits.

Significant positive effects are identified in relation to improving vitality and viability of town centres (SA18) and in relation to the delivery of housing (SA1). The impact to SA4 community cohesion could be significant and positive, but remains uncertain at this stage.

A potential significant negative effect is identified in relation to SA14 (integrity of SSSI and Natura sites).

Uncertain effects are identified in relation to SA7 (greenhouse gas emissions), and SA11 (flood risk and resilience to climate change).

Option 6: Exceptional Circumstances (Green Belt and Metropolitan Open Land)

This option could facilitate housing and employment development. Identified effects would be dependent on the location of development and whether it is on greenfield or brownfield land. Minor negative effects could potentially occur in relation to air quality, greenhouse gas emissions and access via sustainable transport modes. Open space sites typically do not have sustainable transport links, and thus this option could result in more car-based development.

The appraisal records the key benefit of this option as the delivery of housing developments. There is a lot of uncertainty associated with this option because it is not known whether developments which would come forward would be strategically planned or piecemeal.

A potential positive significant effect (with some uncertainty) is identified in relation to the delivery of housing (SA1).

Potential uncertain significant negative effects are identified for SA12 in relation to the inefficient use of land and loss of soil and geological resources.

A potential significant negative effect is also identified in relation to the loss of Green Belt and MOL land (SA15).

3.3 There are also a number of uncertain effects of this option such as in relation to effects on the water environment (SA10), energy (SA8), flood risk / climate change resilience (SA11), biodiversity (SA13) and ecological sites (SA14). In addition, uncertain minor negative effects on air quality (SA9), greenhouse emissions (SA7) and the historic environment (SA17) are recorded in the appraisal. Sustainability Effects of the Policy Direction Options

Decent Homes for Everyone

The appraisal has found that all of the policy direction options, if considered alone, would result in minor positive effects in relation to SA1 (meeting housing needs) but, if combined, Options 1 to 5 could result in significant positive effects and address all of the housing issues identified in the SA scoping process. All of the options could contribute to positive effects in relation to the health and wellbeing of residents within the Borough (SA3).

Option 1:

Option 1 aims to maximise opportunities to increase the supply of housing in the Borough. A minor positive effect is identified in relation to the efficient use of land because the option involves maximising opportunities for new housing delivery including the redevelopment of land and supporting estate regeneration.

Potential significant negative and uncertain effects have been identified in relation to in relation to waste (SA6), greenhouse gas emissions (SA7), conserving energy (SA8), improving air quality (SA9), water (SA10), climate change resilience (SA11), biodiversity (SA13), SSSI and Natura 2000 sites (SA14), open space / green belt land (SA15), and the historic environment (SA17).

Uncertain effects are identified in relation to Community cohesion and access to community facilities (SA4) and Sustainable transport Access (SA5).

Options 2 and 3:

As well as minor positive effects with regards to housing delivery (SA1) and health and wellbeing (SA3), minor positive effects are also identified in relation to SA4 (improving community cohesion) and sustainable access to facilities (SA5) in relation to these two options.

Options 4 and 5:

These options perform similarly and would result in minor positive effects with regards to housing delivery (SA1) and health and wellbeing (SA3),

Option 6:

This option will address specific needs of gypsy and travellers and should result in a minor positive effect. Should evidence suggest that new sites are required then this policy direction may need to be revised in order to meet needs.

Building a Resilient Economy

The appraisal has considered each policy direction option in isolation but it is suggested that all of the potential policy directions could be taken forward simultaneously to ensure that opportunities to improve the economy, support employment creation and improve skills are all optimised. If all options are taken forward, the range of sustainability issues identified for economy and employment would be addressed and potential significant positive effects could result in relation to SA Objectives 19 and 20.

Option 1:

This policy direction option is likely to result in a minor positive effect in relation to retaining existing jobs in the Borough (SA20). Mainly neutral effects are recorded in the appraisal and the option will help to maintain stable levels of employment in the Borough (SA20).

Option 2:

This policy direction option is likely to result in new development of office uses. Potential minor positive effects are identified in relation to delivering jobs growth (SA20), improving the local economy by enabling employment developments (SA19), improving access to employment locations (SA5) and improving air quality through reducing emissions from private vehicles (SA9).

The appraisal recorded some uncertain potential significant negative effects resulting from development, such as in relation to local greenhouse gas emissions (SA7), local distinctiveness (SA16), the historic (SA17) and natural environment and biodiversity (SA13), energy use (SA8), greenhouse gas emissions (SA9), waste arisings (SA6).

Option 3:

This policy direction option is likely to result in new development, through the densification and intensification of existing employment uses in certain areas. Minor positive effects are identified in relation to delivering jobs growth (SA20), improving the local economy by enabling employment developments (SA19), improving access to employment locations (SA5) and through the efficient use of land (SA6).

The appraisal recorded some uncertain potential significant negative effects resulting from development, such as in relation to greenhouse gas emissions (SA7), local distinctiveness (SA16), the historic (SA17) and energy use (SA8).

Option 4:

Potential minor positive effects are identified in relation to delivering jobs growth (SA20) and improving the local economy by enabling employment developments (SA19) and improving access to employment via sustainable modes (SA5). Minor positive effects with uncertainty are also identified in relation to improving air quality (SA9), reducing greenhouse gas emissions (SA7) and conserving energy (SA8); the uncertainty relating to whether new employment uses in mixed use developments would provide employment for local residents or whether some employees would need to travel.

Options 5 and 6:

These options would both provide slightly different benefits (delivery of affordable workspace and delivery of creative enterprise zones) but they both perform similarly in the appraisal: potential minor positive effects are identified in relation to delivering jobs growth (SA20) and improving the local economy by providing new employment developments (SA19).

Option 7:

This policy direction option should result in minor positive effects through indirectly supporting the reduction in crime and fear of crime (SA2), through helping to meet community needs through improving access to training (SA20 and SA4). Potential minor positive effects are identified in relation to maintaining stable levels of employment in the Borough through providing more training opportunities which is a key issue in the Borough (SA20).

Providing Physical Infrastructure

The appraisal has considered each policy direction option in isolation. It is suggested that all of the potential policy directions could be taken forward simultaneously to ensure that appropriate physical infrastructure is delivered within the Borough to meet the needs of existing and new residents.

Option 1:

Potential minor positive effects are identified in relation to the local economy and supporting employment (SA19), and also with regards to reducing the need to travel (SA5) and associated greenhouse gas emissions (SA7), energy use (SA8) and air pollution (SA9). It is assumed that new digital infrastructure would involve the laying of cables in areas where utilities already exist such as within roads / pavements.

Option 2:

Potential minor positive effects are identified in relation to meeting the needs of business (SA19) and therefore supporting employment (SA20). Potential minor positive effects are also identified in relation to water quality (SA10) because this option could provide new waste water treatment facilities if they

were required. It is assumed that potential effects on ecological sites from new utilities infrastructure could be avoided through the careful selection of suitable sites for any such development.

Uncertain negative effects could potentially occur in relation to heritage assets (SA17) and the natural environment (SA13) but effects would be dependent on the location and nature of any developments proposed.

Option 3:

Potential minor positive effects are identified in relation to this policy direction option because it should reduce the need for waste transportation outside the Borough which will help to improve air quality (SA9), conserve energy (SA8) and reduce greenhouse gas emissions (SA7).

Potential uncertain negative effects are also identified if new waste sites are developed in relation to heritage assets (SA17) and the natural environment (SA13) but effects would be dependent on the location and nature of any developments proposed.

Option 4:

This option involves the delivery of on-site utilities as part of major sites. It is assumed that potential environmental effects of major sites would be dealt with on a development-wide basis and have not been considered in this appraisal. It is assumed that such facilities would not emit air pollution (SA9), such as biomass boilers, which could have negative effects on local air quality in certain places. Potential minor positive effects are identified in relation to supporting the local economy (SA19) and therefore employment (SA20), through meeting infrastructure needs of businesses. Minor positive effects are also identified as a result of reducing the need to travel (or transmission of electricity) (SA5) and associated greenhouse gas emissions (SA7), energy use (SA8) and air pollution (SA9).

Option 5:

Potential minor positive effects are identified because this option should support businesses (SA19) and provide improved access for residents to employment areas and community, social, recreational facilities (SA5). It should also reduce greenhouse gas emissions (SA7) and improve local air quality (SA9), through reducing private car journeys and therefore some potential minor positive effects have also been recorded. Minor positive effects are also identified due to the potential for this option to improve peoples' health (SA3) and conserve energy (by reducing private vehicle use) (SA8).

Option 6:

Potential minor positive effects are identified because this option should support businesses (SA19) and provide improved access for residents to employment areas and community, social, recreational facilities (SA4). It should also reduce greenhouse gas emissions (SA7) and improve local air quality (SA9), through reducing private car journeys and therefore some potential minor positive effects have also been recorded. Minor positive effects are also identified due to the potential for this option to improve peoples' health (SA3) and conserve energy (by reducing private vehicle use) (SA8).

Potential uncertain significant negative effects could occur in relation to the loss of soil resources (SA12) and generation of construction waste (SA6). Potential uncertain minor negative effects are also recorded in relation to biodiversity and the natural environment (SA13), integrity of SSSI and Natura 2000 sites (SA14) and heritage assets (SA17) but effects would be dependent on the location and nature of any developments proposed.

Meeting Social and Community Infrastructure Needs

The appraisal has considered each policy direction option in isolation but it is suggested that all of the potential policy directions could be taken forward simultaneously to ensure that residents' needs are met and new facilities are located where there is particular need. All of the policy direction options could potentially support the vitality and viability of town centres if healthcare and community facilities are located within or near to town centres. All of the policy direction options (with the exception of option 5) support increasing employment in the health and care sector through provision of new facilities.

Option 1:

Minor positive effects have been identified in relation to stable employment (SA20) and accessibility (SA5). It is assumed that provision of facilities to meet needs of all residents close to their homes.

Potential significant positive effects have been identified in relation to health and wellbeing (SA3) and community cohesion (SA4).

Option 2:

Minor positive effects have been identified in relation to stable employment and accessibility. It is assumed that provision of facilities to meet needs of all residents close to their homes. **Potential significant positive effects have been identified in relation to health and wellbeing (SA3) and community cohesion (SA4).**

Option 3:

Minor positive effects have been identified in relation to stable employment and accessibility. The risk of negative effects occurring would be dependent on the sites chosen and the nature of the development, e.g. whether biodiversity could be improved through the development or whether an existing building is redeveloped, improving the local townscape. It is assumed that provision of facilities to meet needs of all residents close to their homes.

Potential significant positive effects have been identified in relation to health and wellbeing (SA3) and community cohesion (SA4). Uncertain effects have been identified in relation to the natural environment (SA13). New development could result in negative effects on the natural environment but the risk depends on the sites chosen and nature of development.

Option 4:

Should new facilities only be focused around new development areas, this could result in poor access for some existing residents. New hubs of health and care facilities could potentially be larger new developments and therefore the appraisal has identified uncertainty around potential negative effects in relation to the natural environment. The risk of negative effects occurring would be dependent on the sites chosen and the nature of the development, e.g. whether biodiversity could be improved through the development or whether an existing building is redeveloped, improving the local townscape.

Potential significant positive effects have been identified in relation to health and wellbeing (SA3) and community cohesion (SA4). Potential uncertain effects are identified with relation to SA3 (health), SA13 (biodiversity) and SA18 (town centres).

Option 5:

An assumption has been made that the provision of facilities to meet needs of all residents will be within reasonable walking distance from their homes.

Potential significant positive effects have been identified in relation to health and wellbeing (SA3), community cohesion (SA4) and sustainable transport access (SA5).

Option 6:

Minor positive effects have been identified in relation to stable employment and accessibility. It is assumed that provision of facilities to meet needs of all residents close to their homes.

Potential significant positive effects have been identified in relation to health and wellbeing (SA3), and community cohesion (SA4).

Distinctive Town Centres and High Streets

All of the options have been appraised individually and some options are more discreet and specific than others, for example, Option 7 relates only to particular types of activities likely to make people unhealthy e.g. betting shops and hot food takeaway shops. The appraisal has identified that the options could have some differing potential effects, and none would result in significant positive effects on its own, particularly in relation to SA18. A combination of policy directions will therefore be needed to address sustainability issues identified for town centres, which are “the need to support and promote retail, business, cultural, leisure and residential investment in town centres”.

Option 1:

Potential minor positive effects are identified through supporting high street / town centre businesses (SA19) and employment (SA20) and maintaining suitable space / premises; supporting town centre vitality and viability (SA18), maintaining local distinctiveness (SA16) and maintaining access to facilities and thereby supporting community cohesion (SA4).

Option 2:

Similar to Option 1, potential minor positive effects are identified through support for high street / town centre businesses (SA19) and employment in the growth areas (SA20); supporting town centre vitality and viability (SA18), and maintaining access to facilities and thereby supporting community cohesion (SA4). The option could also improve access to facilities in sustainable locations and reduce the need to travel (SA5).

Option 3:

Neutral or minor positive potential effects are identified for this option. It could help to support retail and non-retail town centre and high street businesses (SA19), through clustering, grouping and optimising distribution. It should support employment (SA20) in retail and non-retail high street businesses and support town centre vitality and viability (SA18). It should also help to maintain local distinctiveness (SA16), improve access by sustainable transport modes (SA5) and improve accessibility to facilities thereby supporting community cohesion (SA4).

Option 4:

Potential minor positive effects are identified in relation to support for the night time economy, provision of premises (SA19) and creation of jobs (SA20). The option should also help to improve local distinctiveness (SA16) and could provide more social / meeting places for the community, thereby supporting community cohesion (SA4). This option could improve access to facilities by sustainable transport modes. Encouraging the night time economy can increase footfall and thereby reduce crime incidents but could also increase incidents if there is an increase in anti-social behaviour associated with particular uses, such as bars.

An uncertain effect is identified in relation to crime (SA2).

Option 5:

Some potential minor positive effects have been identified for this option in relation to supporting 'meanwhile' and pop up businesses (SA19) and associated employment opportunities (SA20), supporting the vitality and viability of town centres (SA18) and improving local distinctiveness (SA16). The option also represents an efficient use of land (SA12).

Uncertainty is recorded in the appraisal in relation to whether any social benefits would result from the option (SA4). This would depend on the nature of the 'meanwhile' and pop-up uses / businesses.

Option 6:

Creating distinctive retail centres could create greater vitality in some places, creating specialist retail identities for some parts of the Borough and providing specialist retail employment opportunities. Therefore, minor positive effects are identified for town centre vitality and viability (SA18) and the creation of jobs (SA20).

The option should provide opportunities for some retail businesses but may create barriers for others if there are no opportunities to move to specific retail centres. Therefore, a minor positive and uncertain effect is identified for the provision of support for high street / town centre businesses (SA19).

It is uncertain whether creating distinctive retail centres will bring social / community benefits (SA4) and it is uncertain whether specialisation of retail in certain parts of the Borough would reduce accessibility (SA5) and affect local distinctiveness (SA16).

Option 7:

This option has mixed potential positive and negative effects. Whilst potential minor negative effects are identified in that it does not support businesses such as betting shops and takeaways (SA19) and therefore related employment (SA20). Minor positive effects should result from this option in relation to supporting health and wellbeing (SA3), reducing takeaway-related litter (SA6) and supporting local distinctiveness (SA16).

Growing Our Culture and Visitor Attractions

When considered alone, no potential significant positive or negative effects have been identified in the appraisal of each policy direction option for this topic. However, if a combination of the options is taken forward, there is a potential for cumulative significant effects in relation to community cohesion and access to facilities, supporting the economy and employment.

Option 1:

Potential minor positive effects are identified in relation to providing employment developments and maintaining employment levels in the Borough. Creating cultural or creative clusters / quarters could support the enhancement of the built environment and local distinctiveness but this would be dependent on the location, development proposed, regeneration opportunities etc.

An uncertain minor positive effect is identified because this option could support the vitality of town centres (SA18). An uncertain effect is identified (SA4) because it is uncertain whether clustering cultural facilities / attractions would increase access to such facilities for residents. It could reduce access to new facilities if these were clustered in a limited number of places across the Borough. It is uncertain that creating clusters would increase access by sustainable transport modes (SA5). Clusters should be directed to locations with good sustainable transport access.

Option 2:

Potential minor positive effects are identified because the provision of community spaces for local events and festivals supports improving the well-being of residents (SA3) and the option supports provision of new community facilities (SA4).

Option 3:

Potential minor positive effects are identified because this option should support some creative sector businesses through provision of spaces, such as galleries. This option should also support the vitality of town centres, which also have good sustainable transport access, contributing to reducing greenhouse gas emissions and therefore potential minor positive effects are also identified for SA Objectives 5, 7 and 18.

Option 4:

Potential minor positive effects are identified because provision of public art and culture within developments supports improving the well-being of residents (SA3) and supports community cohesion (SA4). It may also help to improve access to cultural facilities and public art for residents by providing it within new developments; it could help to improve local distinctiveness; it supports employment growth by providing job opportunities in cultural / creative sectors and it supports some creative / leisure sector businesses through encouragement of inclusion of cultural facilities e.g. cinema, theatre, music / performance venues in new developments and therefore minor positive effects are also identified for SA5, SA16, SA19 and SA20.

Option 5:

Potential minor negative effects are identified because new visitor accommodation could create waste through construction and in operation (SA6), it could increase the greenhouse gas emissions of the Borough (SA7), have high demands for energy (SA8), and water (SA10). Potential minor positive effects are identified because the option supports the hotel / hospitality and other sectors through providing development space and accommodation for all types of visitor. A minor positive effect is also identified because the option supports employment in the hotel / hospitality sector (SA20).

An uncertain minor positive effect is identified because the option could increase air pollution from transport, depending on where new visitor accommodation is located in the Borough (SA9).

Option 6:

Potential minor positive effects are identified because the option supports employment in the hotel / hospitality sector (SA20); it may provide development opportunities for business which contribute to the night time economy and could also, therefore, support the vitality and viability of town centres (SA18). Supporting a thriving evening economy could also help improve the well-being of residents (SA3).

Option 7:

Potential minor positive effects are identified because securing more public art and culture supports improving the well-being of residents (SA3); could contribute to maintaining and improving local distinctiveness (SA16) and would provide new community facilities, improving access and contributing to community cohesion (SA4).

Creating High Quality Places

The appraisal has considered each policy direction option in isolation. Significant positive effects are identified for some of the options but there are no options that would result in several significant positive effects. Taking forward all, or a combination of the policy directions, would therefore create the most sustainability benefits.

Option 1:

Potential minor positive effects have been identified regarding town centre viability (SA18) and local distinctiveness (SA16).

There is some uncertainty surrounding SA17 (Historic Built Environment) and without policy direction option 5, this option could lead to some new developments not respecting local character and distinctiveness.

Option 2:

Potential minor positive effects have been identified regarding air quality (SA9), low carbon growth and greenhouse emissions (SA7), community cohesion (SA4), health and wellbeing (SA3) and sustainable access (SA5).

An uncertain minor positive effect has been identified in relation to biodiversity and the natural environment, as it is not certain that more green spaces would be created.

Option 3:

Designing out principals would need to be sensitive to both the natural and historic environments within the Borough. A minor positive has been identified in relation to town centre viability.

Potential significant positive effects have been identified in relation to crime reduction (SA2).

Option 4:

Potential significant positive effects have been identified in relation to local distinctiveness. Other minor positive effects have been identified for SA18 (Town Centre Viability), and SA1 (Housing). There is some uncertainty on how much housing would be created as a result and whether this would meet the housing needs of the Borough.

A potential significant positive effect is identified in relation to promoting local distinctiveness (SA16).

Option 5:

Potential minor positive effects have been identified in relation to the historic built environment and local distinctiveness. No other effects were identified. It is likely that this option could be covered by policy direction 1 and may not need to be carried forward.

Option 6:

Minor positive effects have been identified in relation to local distinctiveness (SA16), community cohesion (SA4) and town centre viability (SA18).

A potential significant positive effect has been identified in relation to health and wellbeing (SA3), as this option aims to create well designed places that promote improved access to amenities, whilst also supporting the health and wellbeing of the Borough's residents.

Enhancing and Preserving our Heritage

The appraisal of the heritage-related potential policy directions has found that most of the options perform similarly, have the potential to result in significant positive effects on heritage assets and in terms of improving local distinctiveness. Not all of the options would need to be taken forward in order to achieve these significant positive effects.

Option 1:

A potential minor positive effect on the Borough's local distinctiveness and character (SA16) was identified.

Potential significant positive effects are identified in relation to the conservation and enhancement of the historic built environment within the Borough (SA17).

Option 2:

The policy option has the potential for a minor positive effect on climate change resilience (SA11). The effect on town centre viability (SA18) has also been identified a potential minor positive effect.

Potential significant positive effects are identified in relation to the conservation and enhancement of the historic built environment (SA17) as well as the local distinctiveness and character of the Borough (SA16).

Option 3:

A minor positive effect has been identified in relation to community cohesion (SA4) which could work towards promoting the Borough's unique heritage and help to celebrate local culture, heritage and therefore encourage community cohesion.

Potential significant positive effects are identified in relation to the conservation and enhancement of the historic built environment (SA17) as well as the local distinctiveness and character of the Borough (SA16).

Option 4:

Restoring heritage assets at risk or under threat will work toward enhancing areas of the Borough, which could include town centres and therefore a minor positive effect is identified for SA18.

Potential significant positive effects are identified in relation to the conservation and enhancement of the historic built environment (SA17) as well as the local distinctiveness and character of the Borough (SA16).

Protecting and Enhancing our Environment

The appraisal has considered each policy direction option on its own merit but it is suggested that all of the potential policy directions could be taken forward simultaneously to ensure that the environment is protected and enhanced throughout the Borough.

Option 1

Potential minor positive effects have been identified in relation to green belt and open spaces (SA15), soil quality (SA12), flood risk and climate change resilience (SA11), air quality (SA9) and health and wellbeing (SA3).

There is some uncertainty as to whether housing targets will be met through development outside of Green Belt, Metropolitan Open Land or open space areas and an uncertain effect is therefore identified for SA1. Significant positive effects have been identified in relation to biodiversity and the natural environment (SA13).

Option 2

Minor positive effects have also been identified in relation to flood risk and climate change resilience (SA11), sustainable accessibility (SA5) and community cohesion (SA4). There is uncertainty around the location of new 'local green spaces', but by locating them within reasonable walking distance of new and existing homes should result in minor positive effects in relation to SA5 (improving sustainable transport access).

Significant positive effects have been identified in relation to biodiversity (SA13), health and wellbeing (SA3) and SA15 (maintain and enhance the quality of the green belt and open space areas).

Option 3

Potential minor positive effects have been identified in relation to employment opportunities (SA20), biodiversity (SA13), soil quality (SA12), climate change resilience (SA11) and sustainable accessibility (SA5).

Potential significant positive effects have been identified in relation to green belt and open spaces (SA15), air quality (SA9), community cohesion (SA4), and health and wellbeing (SA3). A potential uncertain significant positive effect has been identified in relation to town centre viability (SA18), as the provision of new open green spaces would depend on the on the results of the call for sites process.

Option 4

Potential significant positive effects have been identified in relation to greenbelts and open spaces (SA15), SSSI and Natura sites (SA14) and biodiversity (SA13). Some uncertain minor positive effects have been identified with regards to air quality (SA9), and climate change resilience (SA11). The effect of these policies on the SA objectives are dependent upon the initiatives selected.

Ensuring Climate Change Resilience

The appraisal has considered each policy direction option in isolation but it is suggested that all of the potential policy directions could be taken forward simultaneously to ensure that climate change resilience is improved throughout the Borough.

Option 1

Minor negative effects have been identified regarding the historic built environment (SA17) however, the risk of negative effects would be dependent upon site selection as well as the design, materials and construction methods used. The policy option has the potential for a minor positive effect on energy conservation (SA8). A minor positive effect has been identified with regard to air quality. Low carbon initiatives should be beneficial for air quality.

Potential significant positive effects have been identified with regard to reduction of greenhouse gas emissions (SA7).

Option 2

A number of minor positive effects have been identified as a result of this policy direction with regards to employment developments (SA20), town centre viability (SA18), protecting local biodiversity (SA13) as well as local SSSI and Natura Sites (SA14), water quality (SA10), greenhouse gas emissions (SA7), sustainable transport (SA5) and community health and wellbeing (SA3). The policy direction should help to alleviate reliance upon private car use and encourage use of sustainable transport options, which should subsequently help to improve the Borough's air quality.

Potential significant positive effects have been identified with regards to air quality (SA9) and sustainable accessibility (SA5).

Option 3

Minor negative effects have been identified regarding the historic built environment (SA17) however, the risk of negative effects would be dependent upon site selection as well as the design, materials and construction methods used.

A number of minor positive effects have been identified regarding waste reduction and efficiency, energy conservation, and greenhouse gas emissions. **There are some uncertainties regarding the type of sustainable design features incorporated within developments (SA10, SA11 and SA13), and further details would be needed when a policy is drafted to determine the overall effect of the policy.**

Option 4

A number of minor positive effects have been identified regarding the protection of local biodiversity as well as local SSSI and Natura Sites, flood risk and climate change resilience (SA11), water quality and efficiency (SA10), energy conservation (SA8), greenhouse gas reduction (SA7), and waste reduction and resource efficiency (SA6). Minor negative effects have been identified regarding the historic built environment (SA17).

Option 5

Minor positive effects have been identified with regards to the protection of local biodiversity as well as local SSSI and Natura Sites, flood risk and climate change resilience and the protection of soil quality and geological resources (SA12).

3.4 Mitigation and Enhancement Measures

Suggestions for measures in which to mitigate for potential negative and uncertain effects and enhance neutral or potential positive effects have been put forward within the detailed appraisal tables. Mitigation is specifically put forward in Annex C (Tables C.1 to C.10) to address potential negative and uncertain effects. The suggestions include general mitigation, such as the control of development through the planning application process, and the avoidance of significant negative effects through the careful location of development, and more specific mitigation, such as development of any historic site or listed building would need to be sympathetic to its intrinsic character, and not detract from the historic built environment.

Refinement of the details of the Strategic Growth Options at later stages, depending on which option is taken forward, could improve the positive effects and ensure any negative effects are fully mitigated. For example, direct and indirect impacts, including to biodiversity, flooding and cultural heritage sites will need to be considered at subsequent appraisal stages but could be mitigated with standard measures and careful choice of allocation sites. All potential allocation sites will be considered later in the plan preparation process and all sites which are considered to be reasonable options will be subject to SA. Policies will also be developed in the Local Plan which will mitigate for the potential effects of all developments, such as in relation to biodiversity and accessibility, and in relation to specific allocation sites, if necessary.

4 HRA Screening

4.1 Introduction

This section reports on the Likely Significant Effects (LSEs) on Natura 2000 sites identified in the appraisal of the Direction of Travel options. LSEs were identified in the appraisal in relation to SA Objective 14.

4.2 Screening Findings

LSEs have been identified are follows:

Growth Option 1: Developer-Led:

Developer-led approach is unlikely to provide strategic and larger scale opportunities to protect and enhance the wildlife and habitats in and near to Waltham Forest.

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.

Growth Option 2: Key Growth Areas:

Black Horse Lane Key Growth Area includes Waltham Reservoir SSSI and Lee Valley Ramsar site, 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 appraisal would be needed at subsequent Local Plan and project stages.

Option 3: Growth Hubs:

Lack of detail at this stage makes the appraisal against SA Objective 14 uncertain. Key Growth Hubs could be located at any place in the Borough so there is a possibly of direct or indirect negative impacts. With respect to the precautionary principle, an LSE is identified due to uncertainty.

Growth Option 4: Town Centres:

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 any adverse effects on the SAC and this would need further considered in the HRA if this option were taken forward. With respect to the precautionary principle, an LSE is identified due to uncertainty.

Growth Option 5: Combined Approach:

Waltham Reservoir SSSI and Lee Valley Ramsar site, 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 appraisal would be needed at subsequent Local Plan and project stages.

Growth Option 6: Exceptional Circumstances:

The SA has identified the possibility of direct and indirect negative effects on 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. With respect to the precautionary principle, an LSE is identified due to uncertainty.

Decent Homes for Everyone:

Policy direction 1 involves maximising opportunities to increase the supply of homes which could have adverse effects on SSSI and Natura 2000 sites within and close to the Borough and this is therefore identified as an LSE.

Providing Physical Infrastructure:

With regards to policy direction option 6, an LSE is identified due to uncertainty. Transport infrastructure improvements could potentially have negative effect on Natura 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.

In addition to LSEs, the appraisal of the potential policy directions has also identified some potential positive effects on Natura 2000 sites, as follows:

Ensuring Climate Change Resilience:

Several potential policy directions considered under this topic could result in positive effects on Natura 2000 sites, such as 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; Making efficient use of water and reducing water demand could have an indirect, beneficial effect on some SSSI and Natura 2000 sites; and minimising the impact of flooding could help to protect vulnerable habitats.

Protecting and Enhancing Environment:

Policy direction option 4 aims to protect the Natura and SSSI sites and their unique biodiversity and this would significantly contribute to the achievement of SA14.

5 Conclusions

Each of the options within the Direction of Travel document has been appraised against the Objectives within the SA Framework in order to identify the potential sustainability effects associated with them.

Growth option 1 could result in a combination of minor negative, minor positive and some potentially significantly negative effects in relation to air quality, community cohesion / access to social infrastructure, sustainable transport access and Natura 2000 sites (which may need further investigation in the HRA if this option is taken forward).

Growth option 2 would build upon the successes of the current Key Growth Areas but the appraisal has identified a number of uncertain effects as well as minor positive and negative effects of implementing this approach. A potential significant negative effect on Natura 2000 sites is identified in the appraisal (which may need further investigation in the HRA if this option is taken forward).

Growth option 3 presents a great deal of uncertainty, which is recorded within the appraisal. Potential minor positive and minor negative effects are also identified for this option, as well as a potential uncertain effect on Natura 2000 sites (which may need further investigation in the HRA if this option is taken forward), and uncertain significant positive effect on community cohesion and the reduction of inequality.

The appraisal of growth option 4 has found that this option could potentially result in significant positive effects on the viability and vitality of town centres and a range of other potential minor positive effects. A potential uncertain effect is identified in relation to the integrity of Natura 2000 sites due to the proximity of Wood Street town centre to Epping Forest SSSI and SAC site. Uncertain effects are also identified in relation to health, greenhouse gas emissions and energy conservation.

Growth option 5 is a combined approach, taking forward options 2, 3 and 4 and therefore the appraisal reflects the potential positive effects also recorded in the appraisal of these other options. As such, it represents the most beneficial option. It too presents a risk of potential significant negative effects on Natura 2000 sites (which would need further investigation in the HRA if this option is taken forward), as well as uncertain significant positive effects on community cohesion and the reduction of inequality. The appraisal identifies that this option also has the potential to result in significant positive effects on the delivery of housing to meet needs and could also result in a significant positive effect on the viability and vitality of town centres.

The appraisal of growth option 6 identified a significant negative effect with regards to protecting Green Belt and open space land and uncertain negative effects in relation to protecting historic assets, water, energy, climate change resilience, conserving and enhancing the natural environment, protecting ecological sites (SSSI and Natura 2000 sites), and ensuring the efficient use of land. Some potential minor negative and minor positive effects were also identified in the appraisal. This option could, however, potentially result in a significant positive effect (but with some uncertainty) in relation to the delivery of housing to meet needs.

The appraisals of the potential policy directions have identified the potential positive, negative and uncertain effects of each of the options. The individual effects of each of the potential policy directions can be found in Section 3.3 or in Tables C.1 to C.10 in Annex C. The effects are too numerous and varied to summarise. For most topics, the appraisals have found that most of the potential policy directions could result in minor positive effects alone, but by taking them forward together or in combination, significant positive sustainability effects could be achieved.

6 Next Steps

Following receipt of responses to the consultation on the Direction of Travel document and this accompanying report on the SA and HRA screening of options, LBWF officers will choose a strategic option to take forward and develop into the Local Plan. Choices will also be made over whether to take forward all or some of the potential policy directions and whether any further options needs to be considered.

Any additional options which come forward for consideration, which are reasonable alternatives, will also be subjected to SA and HRA screening.

The timetable for the preparation of the Local Plan is presented in Table 6.1.

Table 6.1: Local Plan Preparation Timetable

Stage		Time	What happens?
Stage 1	Direction of Travel	Autumn 2017	Six week consultation. The responses will be used to shape the new draft Local Plan.
Stage 2	Draft Plan/ Preferred Option	Summer 2018	LBWF will publish and consult on a draft Local Plan, based on evidence, the Council's strategies and responses received in Stage 1. The consultation will run for six weeks. Responses received will be used to shape the Proposed Submission.
Stage 3	Proposed Submission	Spring 2019	LBWF will publish and consult on the Proposed Submission to the Secretary of State for examination. This is the public's final chance to engage with the Plan before it is finalised for submission. Consultation will run for six weeks.
Stage 4	Submission to the Secretary of State	Autumn 2019	To ensure the Local Plan is deliverable it has to be submitted for examination to the Secretary of State. All the evidence and consultation reports will also be submitted to show how the Council has considered all the issues.
Stage 5	Examination by Independent Person	Winter 2019	The Secretary of State will appoint an Independent Person to examine the Local Plan, called an Inspector. The Local Plan will then face examination. The Inspector can make minor or major modifications to the Local Plan.

Stage		Time	What happens?
Stage 6	Adoption	Summer 2020	The new Local Plan will be taken to Full Council, which will make a decision on adoption.