

London Borough of Waltham Forest
Local Plan Part 1 with Post Hearing Main Modifications
Sustainability Appraisal Report

July 2023

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1. Introduction

- 1.1. This report is an Addendum to the Sustainability Appraisal (SA) submitted as part of the Local Plan examination, which provides an assessment as to whether the proposed Main Modifications to the Local Plan are likely to have significant effects on the sustainability objectives.
- 1.2. A new Local Plan is needed to support the Council's 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 Local Plan will guide development in the Borough and when adopted, will replace the currently adopted Core Strategy for the London Borough of Waltham Forest.
- 1.3. Local Plan Part 1 (LP1) is the overarching strategic policy document and Part 2 of the Local Plan (LP2) is the Site Allocations Document which is being prepared separately. LP1 contains policies which set out the level of growth to be delivered over the plan period, a spatial strategy including strategic development locations and development management policies.

2. What has happened so far?

- 2.1. The Sustainability Appraisal process is shown in Table 1. Stage A, Scoping, was completed in September 2017 for the draft Local Plan and was updated between January and August 2020.
- 2.2. The Submission Local Plan Sustainability Appraisal Report¹ encompasses Stages B and C of the SA process (evaluation of the Local Plan against the SA Framework and SA report preparation) and fulfils the requirements to:
 - 2.2.1. Evaluate the potential effects of the Local Plan implementation
 - 2.2.2. Identify and propose mitigation of significant adverse effects
 - 2.2.3. Propose appropriate monitoring of significant effects
- 2.3. LP1 is currently in Stage 3 Examination according to Figure 1 and the SA is in Stage D2 (ii): Appraising significant changes resulting from representations.
- 2.4. Following the hearing sessions held in March 2022 and 2023, main modifications are proposed to the submission Local Plan in order to address issues of soundness which were raised by the Inspectors.
- 2.5. An updated Sustainability Appraisal was done and consulted on (LPE36.1 -36.4) prior to the Stage 2 hearings held in March 2023.
- 2.6. Following adoption of the Local Plan, the Council will issue a post-adoption statement, and during the period covered by the Plan, the Council will monitor the implementation and respond to any adverse effects.

¹ Available at: https://www.walthamforest.gov.uk/sites/default/files/2023-01/KD4.2_C0093_Waltham_Forest_Submission_LP1_SA_Report%20AA.pdf

Table 1: The SA process

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

3. Review of Main Modifications

- 3.1. The Main Modifications to the Regulation 19 Local Plan are set out in ‘Consolidated Schedule of main modifications to Local Plan LP1 – Post March 2023 Hearing Sessions’. They are set out in Plan order and specify additions to the plan using underlined text and removals from the text by strikethrough. The page numbers and paragraph numbering below refer to the Submission Local Plan, and do not take account of the deletion or addition of text. Each modification is numbered with an ‘MM’ prefix denoting Main Modification.
- 3.2. Each modification has been assessed for its possible impact upon the outcomes determined through the Sustainability Appraisal carried out for the Regulation 19 Local Plan. This baseline is set out in the detailed tables at KD4.5²
- 3.3. The primary consideration for assessing this is whether the modification would lead a decision maker to conclude that a different outcome in terms of performance against the sustainability objectives could be reached. In many cases, modifications are simply updates, clarifications and consequential changes, and in these cases, it is considered that there is no need to review the Sustainability Appraisal. Nonetheless, a significant number of changes do introduce elements that would potentially lead to different conclusions, and it is these that have been reconsidered.
- 3.4. There are a number of modifications which require reassessment of the Sustainability Appraisal against the twenty Local Plan Sustainability Objectives (see Table 2 below) to reflect the changes between Regulation 19 and the Proposed Main Modifications. These are outlined in [Appendix 1 - Sustainability Appraisal screening of Consolidated schedule of main modifications to LP1](#). The policy numbers relate to the submitted Regulation 19 Plan.

Table 2: Local Plan Sustainability Framework Objectives

SA Objective	Description
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

² KD4.5 – Appendix C – Local Plan Part 1 Policies Reassessment, available at: <https://www.walthamforest.gov.uk/sites/default/files/2022-03/LP1%20SA%20Report%20Appendix%20C.xlsm>

SA8	Conserve energy
SA9	Improve air quality
SA10	Improve water quality in rivers and groundwater and ensure the efficient use of water resources
SA11	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

3.5. The policies which require reappraisal are:

- Policy 4
- Policy 9
- Policy 10
- Policy 11
- Policy 12
- Policy 20
- Policy 22
- Policy 23
- Policy 25
- Policy 26
- Policy 27
- Policy 28
- Policy 29
- Policy 30
- Policy 36
- Policy 37
- Policy 38
- Policy 40
- Policy 50
- Policy 51
- Policy 56
- Policy 57
- Policy XX
- Policy 58
- Policy 62
- Policy 65
- Policy 67
- Policy 74
- Policy 79
- Policy 80
- Policy 81
- Policy 83
- Policy 84
- Policy 87
- Policy 90
- Policy 93
- Policy 97

4. Findings

- 4.1. Overall, the assessment of the proposed Main Modifications found that there would be no new significant negative, or negative effects against the sustainability objectives in the SA, with many neutral or positive and significant positive effects being identified. The modifications therefore do not significantly alter the overall findings of the SA of the Regulation 19 Local Plan Report in terms of delivering positive sustainability outcomes, with a number of amendments to give greater clarity and improvements provided.

Appendix 1 – Sustainability Appraisal screening of Consolidated schedule of main modifications to LP1

Policy / Paragraph / Paragraph	Sustainability Appraisal screening
Golden Threads	To add a 7th Golden Thread to recognise the character and heritage of the borough. Does not require altering the SA.
New Strategic Objective	To reflect the council’s corporate strategic objective of delivering 15 Minute rather than 20-minute neighbourhoods. Does not require altering the SA.
Policy 1	Clarifies the implementation of the policy. Does not require altering the SA.
Policy 3	Clarifies the implementation of the policy. Does not require altering the SA.
Policy 4	Amends distribution of growth. Reassess changes through the SA
Policy 5	Correction of wording. Does not require altering the SA.
Policy 6	Wording changes to clarify the implementation of the policy. Does not require altering the SA.
Policy 8	Wording changes to clarify the implementation of the policy.

Policy / Paragraph / Paragraph	Sustainability Appraisal screening
	Does not require altering the SA.
Policy 9	Amends scale of growth and distribution for South Waltham Forest. Reassess changes through the SA.
Policy 10	Amends scale of growth and distribution for Central Waltham Forest. Reassess changes through the SA.
Policy 11	Amends scale of growth and distribution for North Waltham Forest. Reassess changes through the SA.
Policy 12	Inclusion of the stepped requirement for the plan period Reassess changes through the SA.
Policy 13	Wording changes to clarify the implementation of the policy. Does not require altering the SA.
Policy 14	Editorial change. Does not require altering the SA.
Policy 16	Wording changes to clarify the implementation of the policy. Does not require altering the SA.
Policy 18	Wording changes to clarify the implementation of the policy.

Policy / Paragraph / Paragraph	Sustainability Appraisal screening
	Does not require altering the SA.
Policy 19	Wording changes to clarify the implementation of the policy. Does not require altering the SA
Policy 20	Wording changes alter application of car parking policy to HMO and conversion. Reassess changes through the SA.
Policy 21	Deletion.
Policy 22	Wording changes alter policy application. Reassess changes through the SA.
Policy 23	Wording changes alter policy application. Reassess changes through the SA.
Policy 24	Wording changes. Does not require altering the SA
Policy 25	Wording changes alter policy application. Reassess changes through the SA.
Policy 26	Wording changes alter policy application. Reassess changes through the SA.

Policy / Paragraph / Paragraph	Sustainability Appraisal screening
Policy 27	Wording changes alter policy application. Reassess changes through the SA.
Policy 28	Wording changes alter policy application. Reassess changes through the SA.
Policy 29	Wording changes alter policy application. Reassess changes through the SA.
Policy 30	Wording changes alter policy application. Reassess changes through the SA.
Policy 31	Wording changes to clarify the implementation of the policy. Does not require altering the SA.
Policy 32	Wording changes to clarify the implementation of the policy. Does not require altering the SA.
Policy 33	Wording changes to clarify the implementation of the policy. Does not require altering the SA.
Policy 34	Wording changes to clarify the implementation of the policy. Does not require altering the SA.
Policy 35	Wording changes to clarify the implementation of the policy. Does not require altering the SA.

Policy / Paragraph / Paragraph	Sustainability Appraisal screening
Policy 36	Wording changes alter policy application. Reassess changes through the SA.
Policy 37	Wording changes alter policy application. Reassess changes through the SA.
Policy 38	Wording changes alter policy application. Reassess changes through the SA.
Strategic Objective	To reflect the council's corporate strategic objective of delivering 15 Minute rather than 20-minute neighbourhoods. Does not require altering the SA.
Policy 39	Updates the plan wording in respect of other changes made. Has no bearing on the interpretation and meaning of policy. Does not require altering the SA.
Policy 40	Wording changes alter policy application. Reassess changes through the SA.
Policy 41	Wording changes to clarify the implementation of the policy. Does not require altering the SA.
Policy 42	Policy wording incorporated into Policy 43 Does not require altering the SA.

Policy / Paragraph / Paragraph	Sustainability Appraisal screening
Policy 43	Incorporation of policy wording from Policy 42. Does not require altering the SA.
Policy 44	Minor wording changes. Does not require altering the SA
Policy 46	Minor wording changes. Does not require altering the SA
Policy 48	Minor wording changes. Does not require altering the SA
Policy 49	Minor wording changes. Does not require altering the SA
Policy 50	Wording changes alter policy application. Reassess changes through the SA.
Policy 51	Wording changes alter policy application. Reassess changes through the SA.
Policy 52	Policy deletion. Addressed in Policy 60. Does not require altering the SA.
Policy 53	Minor wording changes. Does not require altering the SA

Policy / Paragraph / Paragraph	Sustainability Appraisal screening
Policy 54	Minor wording changes. Does not require altering the SA
Policy 55	Minor wording changes. Does not require altering the SA
Policy 56	Wording changes alter policy application. Reassess changes through the SA.
Policy 57	Wording changes alter policy application. Reassess changes through the SA.
Policy XX – Building Heights	New policy Assess through SA.
Policy 58	Wording changes alter policy application. Reassess changes through the SA.
Policy 59	Minor wording changes. Does not require altering the SA
Policy 60	Minor wording changes. Does not require altering the SA
Policy 61	Minor wording changes. Does not require altering the SA

Policy / Paragraph / Paragraph	Sustainability Appraisal screening
Policy 62	Wording changes alter policy application. Reassess changes through the SA.
Policy 63	Minor wording changes. Does not require altering the SA
Policy 64	Minor wording changes. Does not require altering the SA
Policy 65	Wording changes alter policy application. Reassess changes through the SA.
Policy 66	Minor wording changes. Does not require altering the SA
Policy 67	Wording changes alter policy application. Reassess changes through the SA.
Policy 68	Minor wording changes. Does not require altering the SA.
Policy 69	Minor wording changes. Does not require altering the SA.
Policy 70	No change
Policy 71	No change

Policy / Paragraph / Paragraph	Sustainability Appraisal screening
Policy 72	Minor wording changes. Does not require altering the SA.
Policy 73	Minor wording changes. Does not require altering the SA.
Policy 74	Wording changes alter policy application. Reassess changes through the SA.
Policy 75	Minor wording changes. Does not require altering the SA.
Policy 76	Minor wording changes. Does not require altering the SA.
Policy 77	Minor wording changes. Does not require altering the SA.
Policy 78	Minor wording changes. Does not require altering the SA.
Policy 79	Wording changes alter policy application. Reassess changes through the SA.
Policy 80	Wording changes alter policy application. Reassess changes through the SA.

Policy / Paragraph / Paragraph	Sustainability Appraisal screening
Policy 81	Wording changes alter policy application. Reassess changes through the SA.
Policy 82	Minor wording changes. Does not require altering the SA.
Policy 83	Wording changes alter policy application. Reassess changes through the SA.
Policy 84	Wording changes alter policy application. Reassess changes through the SA.
Policy 85	Minor wording changes. Does not require altering the SA.
Policy 86	Minor wording changes. Does not require altering the SA.
Policy 87	Wording changes alter policy application. Reassess changes through the SA.
Policy 88	Minor wording changes. Does not require altering the SA.
Policy 89	Minor wording changes. Does not require altering the SA.

Policy / Paragraph / Paragraph	Sustainability Appraisal screening
Policy 90	Wording changes alter policy application. Reassess changes through the SA.
Policy 91	Minor wording changes. Does not require altering the SA.
Policy 92	Minor wording changes. Does not require altering the SA.
Policy 93	Wording changes alter policy application. Reassess changes through the SA.
Policy 94	No change
Policy 95	No change
Policy 96	Minor wording changes. Does not require altering the SA.
Policy 97	Wording changes alter policy application. Reassess changes through the SA.

Appendix 2 - Updated Sustainability Appraisal of Modified Policies

Plan version	Policy Name	Sustainability Appraisal Objective																			
		SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16	SA17	SA18	SA19	SA20
Regulation 19 Policy	Policy 4 Location of Growth	++	0	+	+	0	0	0	0	0	0	0	++	0	0	+	0	0	+	+	++
Modified policy	Policy 4 Location of Growth	++	0	+	+	0	0	0	0	0	0	0	++	0	0	+	0	0	+	+	++
Updated policy reflects the evidence of capacity for housing and job growth, with a small change to the apportionment. No impact on the sustainability appraisal scoring.																					

Plan version	Policy Name	Sustainability Appraisal Objective																			
		SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16	SA17	SA18	SA19	SA20
Regulation 19 Policy	Policy 9 South Waltham Forest	++	++	+	+	+	+	+	0	+	0	0	0	0	?	0	-	+	0	++	+
Modified policy	Policy 9 South Waltham Forest	++	++	+	+	+	+	+	0	+	0	0	0	0	+	0	-	+	0	++	+
Updated policy reflects the updated minimum housing contribution for the South Waltham Forest Area. Additional criteria at M and N referencing improvements to the visitor, sporting and wider cultural offer of the Lee Valley Regional Park, and protection of SSSI and Natura 2000 sites.																					
Improvement to score for SA14. It is considered that the policy as proposed to be modified performs more favourably in relation to SA14 (Protect the ecological integrity of SSSI and Natura 2000 sites).																					

		Sustainability Appraisal Objective																			
Plan version	Policy Name	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16	SA17	SA18	SA19	SA20
Regulation 19 Policy	Policy 10 Central Waltham Forest	++	+	+	+	++	0	+	0	+	0	0	0	0	?	0	+	+	++	+	++
Modified policy	Policy 10 Central Waltham Forest	++	+	+	+	++	0	+	0	+	0	0	0	0	+	0	+	+	++	+	++
Updated policy reflects the updated minimum housing contribution for the Central Waltham Forest Area. Additional criteria at N referencing protection of SSSI and Natura 2000 sites.																					
Improvement to score for SA14. It is considered that the policy as proposed to be modified performs more favourably in relation to SA14 (Protect the ecological integrity of SSSI and Natura 2000 sites).																					

		Sustainability Appraisal Objective																			
Plan version	Policy Name	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16	SA17	SA18	SA19	SA20
Regulation 19 Policy	Policy 11 North Waltham Forest	++	+	+	+	+	0	+	0	+	0	?	0	0	?	++	0	0	++	++	++
Modified policy	Policy 11 North Waltham Forest	++	+	+	+	+	0	+	0	+	0	0	0	0	+	++	0	0	++	++	++
Updated policy reflects the updated minimum housing contribution for the North Waltham Forest Area. Updated criterion at N referencing protection of SSSI and Natura 2000 sites.																					
Improvement to score for SA14. It is considered that the policy as proposed to be modified performs more favourably in relation to SA14 (Protect the ecological integrity of SSSI and Natura 2000 sites).																					

Plan version	Policy Name	Sustainability Appraisal Objective																				
		SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16	SA17	SA18	SA19	SA20	
Regulation 19 Policy	Policy 12 Increasing Housing Supply	++	0	0	+	0	0	0	0	0	0	0	?	++	0	?	0	0	0	++	0	0
Modified policy	Policy 12 Inc Hou Supply	++	0	0	+	0	0	0	0	0	0	0	0	++	0	0	0	0	0	++	0	0
<p>The policy modifications alter the phasing of the plans housing requirement – adjusting for evidence of delivery, but still delivering a minimum of 27,000 new homes. Further evidence in relation to the HRA of the Local Plan has considered the potential effects of this policy. Following appropriate assessment and development of mitigation, the HRA of the Submission Local Plan Part 1 has concluded that the Local Plan Part 1 policies will not result in adverse effects on European sites, either alone or in combination with growth in neighbouring areas.</p> <p>No significant change to SA scoring.</p>																						

Plan version	Policy Name	Sustainability Appraisal Objective																			
		SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16	SA17	SA18	SA19	SA20
Regulation 19 Policy	Policy 20 Housing in Multiple Occupation	+	0	+	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Modified policy	Policy 20 Housing in Multiple Occupation	+	0	+	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<p>Changes to policy wording required to make policy effective, reflecting situation where HMOs and conversions have existing car parking. Now proposals will be required to submit evidence to justify any additional parking provision above existing.</p> <p>No change to scoring.</p>																					

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Plan version	Policy Name	Sustainability Appraisal Objective																			
		SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16	SA17	SA18	SA19	SA20
Regulation 19 Policy	Policy 22 Sup & Spec Accom	++	0	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Modified policy	Policy 22 Sup & Spec Accom	++	0	++	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<p>Changes to policy introduce Criteria C and D which aim to retain current facilities, unless they can be reprovided to an equal or improved standard. It addresses some key sustainability issues and is considered to have potential for a significant positive effect, although it is noted that this is of medium magnitude due to the specialised nature of the policy.</p> <p>Improvement to scoring.</p>																					

Plan version	Policy Name	Sustainability Appraisal Objective																			
		SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16	SA17	SA18	SA19	SA20
Regulation 19 Policy	Policy 23 Gypsies & Travellers	+	0	0	0	0	0	0	0	0	0	0	0	0	?	0	0	0	0	0	0
Modified policy	Policy 23 Gypsies & Travellers	+	0	+	+	0	0	0	0	0	0	0	0	0	?	0	0	0	0	0	0

The policy is proposed to be modified to introduce criteria for the consideration of planning applications involving new sites or significant alterations to existing sites. The policy requires that any new site or substantial alteration to an existing site shall provide open space and play areas. A minor positive effect is therefore identified. The policy requires that any new site or substantial alteration to an existing site shall be accessible to public transport, services and facilities, and be capable of support by local social infrastructure. A minor positive effect is therefore identified.

Slight improvement to scoring.

		Sustainability Appraisal Objective																			
Plan version	Policy Name	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16	SA17	SA18	SA19	SA20
Regulation 19 Policy	Policy 25 Supporting Economic Growth & Jobs	0	0	0	0	0	0	0	0	0	0	0	+	0	?	0	0	0	++	++	++
Modified policy	Policy 25 Supporting Economic Growth & Jobs	0	0	0	0	0	0	0	0	0	0	0	+	0	0	0	0	0	++	++	++

The modifications to the plan ensure that the borough's SIL capacity is protected and introduce minor wording changes.

The HRA of the Local Plan has considered the potential effects of this policy. Following appropriate assessment and development of mitigation, the HRA of the Submission Local Plan Part 1 has concluded that the Local Plan Part 1 policies will not result in adverse effects on European sites, either alone or in combination with growth in neighbouring areas.

Minor change to scoring .It is therefore considered that the policy as proposed to be modified performs more favourably in relation to SA14 (Protect the ecological integrity of SSSI and Natura 2000 sites)

		Sustainability Appraisal Objective																			
Plan version	Policy Name	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16	SA17	SA18	SA19	SA20
Regulation 19 Policy	Policy 26 Safeguarding SIL	0	0	0	0	0	+	0	0	0	0	0	0	0	?	0	+	0	++	++	++

Modified policy	Policy 26 Safeguarding SIL	0	0	0	0	0	+	0	0	0	0	0	+	0	0	0	+	0	++	++	++
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The proposed modifications ensure conformity with the London Plan with regards to the uses which are considered to be acceptable for SIL, and encourage landowners to work with neighbouring landowners to bring forward sites in a way that maximises site potential.

Slight improvement in scoring. It is considered that the policy as proposed to be modified performs more favourably in relation to SA14 (Protect the ecological integrity of SSSI and Natura 2000 sites) and SA12 – as it promotes efficient reuse of land and buildings.

Plan version	Policy Name	Sustainability Appraisal Objective																			
		SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16	SA17	SA18	SA19	SA20
Regulation 19 Policy	Policy 27 Safeguarding LSIS	0	0	0	0	0	+	0	0	0	0	0	0	0	?	0	+	0	++	++	++
Modified policy	Policy 27 Safeguarding LSIS	0	0	0	0	0	+	0	0	0	0	0	+	0	0	0	+	0	++	++	++

The proposed modifications ensure conformity with the London Plan with regards to the uses which are considered to be acceptable for LSIS, and encourage landowners to work with neighbouring landowners to bring forward sites in a way that maximises site potential.

Slight improvement in scoring. It is considered that the policy as proposed to be modified performs more favourably in relation to SA14 (Protect the ecological integrity of SSSI and Natura 2000 sites) and SA12 – as it promotes efficient reuse of land and buildings.

Plan version	Policy Name	Sustainability Appraisal Objective																			
		SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16	SA17	SA18	SA19	SA20
Regulation 19 Policy	Policy 28 Safeguarding BEA	0	0	0	0	0	+	0	0	0	0	0	0	0	?	0	+	0	++	++	++

Modified policy	Policy 28 Safeguarding BEA	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	0	+	0	++	++	++
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The proposed modifications ensure conformity with the London Plan with regards to the uses which are considered to be acceptable for BEA, and encourage landowners to work with neighbouring landowners to bring forward sites in a way that maximises site potential.

Slight improvement in scoring. It is considered that the policy as proposed to be modified performs more favourably in relation to SA14 (Protect the ecological integrity of SSSI and Natura 2000 sites) and SA12 – as it promotes efficient reuse of land and buildings.

Plan version	Policy Name	Sustainability Appraisal Objective																			
		SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16	SA17	SA18	SA19	SA20
Regulation 19 Policy	Policy 29 Approach to Non-Designated Employment Land	+	0	0	+	0	0	0	0	0	0	0	+	0	?	0	+	0	++	++	++
Modified policy	Policy 29 Approach to Non-Designated Employment Land	+	0	0	+	0	0	0	0	0	0	0	+	0	0	0	+	0	++	++	++

Minor change to scoring. It is considered that the policy as proposed to be modified performs more favourably in relation to SA14 (Protect the ecological integrity of SSSI and Natura 2000 sites).

Plan version	Policy Name	Sustainability Appraisal Objective																			
		SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16	SA17	SA18	SA19	SA20

Regulation 19 Policy	Policy 30 Industrial Masterplan Approach	0	0	0	0	0	0	0	0	0	0	0	0	+	0	?	0	+	0	0	++	++
Modified policy	Policy 30 Industrial Masterplan Approach	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	0	+	0	0	++	++

The modifications to the Industrial Masterplan Approach policy reflect changes agreed with the GLA to ensure conformity with the London Plan. A definition of industrial capacity is provided to ensure that there is a consistent basis for appraising intensification.

Minor change to scoring. It is considered that the policy as proposed to be modified performs more favourably in relation to SA14 (Protect the ecological integrity of SSSI and Natura 2000 sites).

Plan version	Policy Name	Sustainability Appraisal Objective																				
		SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16	SA17	SA18	SA19	SA20	
Regulation 19 Policy	Policy 36 Promoting Culture & Creativity	0	0	0	++	+	0	0	0	0	0	0	0	+	0	0	0	0	0	++	0	0
Modified policy	Policy 36 Promoting Culture & Creativity	0	0	0	++	+	0	0	0	0	0	0	0	+	0	0	0	0	0	++	0	0

The modifications proposed ensure that there is a clear threshold for application of the policy.

No changes to scoring.

Plan version	Policy Name	Sustainability Appraisal Objective																			
		SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16	SA17	SA18	SA19	SA20

Regulation 19 Policy	Policy 37 Protecting Pubs	0	0	+	+	0	0	0	0	0	0	0	0	-	0	0	0	+	++	+	0	0
Modified policy	Policy 37 Protecting Pubs	0	0	+	+	0	0	0	0	0	0	0	0	-	0	0	0	+	++	+	0	0
<p>Modifications ensure that the socio-economic and cultural function of public houses is reflected. Other changes are minor textual changes.</p> <p>No change to scoring.</p>																						

Plan version	Policy Name	Sustainability Appraisal Objective																			
		SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16	SA17	SA18	SA19	SA20
Regulation 19 Policy	Policy 38 Blackhorse Lane CEZ	0	+	0	+	0	0	0	0	0	0	0	+	0	?	0	++	0	++	++	+
Modified policy	Policy 38 Blackhorse Lane CEZ	0	+	0	+	0	0	0	0	0	0	0	+	0	?	0	++	0	++	++	+
<p>Modifications are limited in scope and improve clarity of wording.</p> <p>No change to scoring.</p>																					

Plan version	Policy Name	Sustainability Appraisal Objective																			
		SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16	SA17	SA18	SA19	SA20
Regulation 19 Policy	Policy 39 Hierarchy of Centres	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	++	+	++

Modified policy	Policy 39 Hierarchy of Centres	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	++	+	++
Modification makes cross reference to 15-minute neighbourhoods and other minor editorial changes for improved clarity.																							
No change to scoring.																							

		Sustainability Appraisal Objective																				
Plan version	Policy Name	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16	SA17	SA18	SA19	SA20	
Regulation 19 Policy	Policy 40 Retail Office & Leisure	0	0	+	++	+	0	0	0	0	0	0	0	0	0	0	0	0	0	++	+	+
Modified policy	Policy 40 Retail Office & Leisure	0	0	+	++	+	0	0	0	0	0	0	0	0	0	0	0	0	0	++	+	+
Modification updates the threshold for applications of a retail impact assessment to 2500m in line with national policy and guidance. Limited editorial changes.																						
No change to scoring.																						

		Sustainability Appraisal Objective																			
Plan version	Policy Name	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16	SA17	SA18	SA19	SA20
Regulation 19 Policy	Policy 50 Promoting Healthy	0	++	++	+	+	0	+	0	+	0	0	0	+	0	+	++	0	0	0	0

	Communities																				
Modified policy	Policy 50 Promoting Healthy Comms	0	++	++	+	+	0	+	0	+	0	0	0	+	0	+	++	0	0	0	0
<p>Modifications emphasise the value of providing access to waterways and the importance of improving public access to our rivers and canals for recreation, health and social wellbeing, the Council proposed to incorporate separate policy clause “J”.</p> <p>No change to scoring.</p>																					

		Sustainability Appraisal Objective																			
Plan version	Policy Name	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16	SA17	SA18	SA19	SA20
Regulation 19 Policy	Policy 51 Health Impact Assessment	+	0	++	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Modified policy	Policy 51 Health Impact Assessment	+	0	++	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0
<p>The modifications change the thresholds for requiring a Health Impact Assessment. Now required for major development within Air Quality Management Areas.</p> <p>Slight improvement to scoring as it is considered that the policy wording as modified will lead to beneficial impact on air quality (SA9).</p>																					

		Sustainability Appraisal Objective																			
Plan version	Policy Name	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16	SA17	SA18	SA19	SA20
Regulation 19 Policy	Policy 56 High Quality Design	+	++	+	+	0	+	+	++	+	-	+	+	++	0	+	++	+	+	0	0

Modified policy	Policy 56 High Quality Design	+	++	+	+	0	+	+	++	+	-	+	+	++	0	+	++	+	+	0	0
Modification proposes wording which requires buildings to achieve exemplar design rather than simply being visually attractive. Other editorial changes emphasise tree-lined streets.																					
No change to scoring.																					

		Sustainability Appraisal Objective																			
Plan version	Policy Name	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16	SA17	SA18	SA19	SA20
Regulation 19 Policy	Policy 57 Taller Buildings	++	+	+	++	++	0	+	+	+	0	+	++	+	0	+	++	+	++	++	0
Modified policy	Policy 57 Tall Buildings	++	+	+	++	++	0	+	+	+	0	+	++	+	0	+	++	+	++	++	0
Modification to improve clarity and satisfy the requirements of the London Plan (2021) with respect to defining tall buildings and indicating locations where they are potentially appropriate.																					
No change to scoring.																					

		Sustainability Appraisal Objective																			
Plan version	Policy Name	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16	SA17	SA18	SA19	SA20
Regulation 19 Policy	N/A – new policy																				

Modified policy	Policy XX - Building Heights	++	+	+	+	+	+	+	+	0	+	0	0	0	0	0	0	+	+	++	++	+
<p>The addition of a specific building heights policy sets out the response to surrounding character and indicative range of typical building shoulder heights.</p> <p>Overall positive scoring, with significant positives identified in relation to SA18, SA19, and SA1.</p>																						

		Sustainability Appraisal Objective																				
Plan version	Policy Name	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16	SA17	SA18	SA19	SA20	
Regulation 19 Policy	Policy 58 Resid Space Standards	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Modified policy	Policy 58 Resid Space Standards	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
<p>Modifications bring policy wording in line with the London Plan. Clarification of space requirements for private external amenity space.</p> <p>No change to scoring.</p>																						

		Sustainability Appraisal Objective																			
Plan version	Policy Name	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16	SA17	SA18	SA19	SA20

Regulation 19 Policy	Policy 62 Promoting Sus Trans	0	+	++	+	++	0	+	0	++	0	0	0	0	0	+	++	0	0	0	0
Modified policy	Policy 62 Promoting Sus Trans	0	+	++	+	++	0	+	0	++	0	0	0	0	0	+	++	0	0	0	0
Modification includes reference to local bus service improvement. Other changes are editorial.																					
No change in score.																					

Plan version	Policy Name	Sustainability Appraisal Objective																			
		SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16	SA17	SA18	SA19	SA20
Regulation 19 Policy	Policy 65 Develop&Trans Impacts	0	0	0	0	++	0	0	0	++	0	0	0	+	+	0	0	0	+	0	0
Modified policy	Policy 65 Develop&Trans Impacts	0	0	0	0	++	0	0	0	++	0	0	0	+	+	0	0	0	+	0	0
Modification identifies the specific threshold for requiring transport assessment and travel plans, and insertion of new requirement for Delivery and Servicing plan.																					
No change in score.																					

		Sustainability Appraisal Objective																			
Plan version	Policy Name	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16	SA17	SA18	SA19	SA20
Regulation 19 Policy	Policy 67 Construction Logistics Plan	0	0	+	0	0	0	+	0	+	0	0	0	0	0	0	0	0	0	0	0
Modified policy	Policy 67 Construction Logistics Plan	0	0	+	0	0	0	+	0	+	0	0	0	0	+	0	0	0	0	0	0
<p>The modification ensures that specific reference is made to the sensitivity of Epping Forest SAC and other air quality sensitive locations.</p> <p>Slight improvement in score. It is considered that the policy as proposed to be modified performs more favourably in relation to SA14 (Protect the ecological integrity of SSSI and Natura 2000 sites).</p>																					

		Sustainability Appraisal Objective																			
Plan version	Policy Name	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16	SA17	SA18	SA19	SA20
Regulation 19 Policy	Policy 74 Conservation Areas	-	0	+	+	0	0	0	0	0	0	0	+	0	0	0	++	++	0	0	0
Modified policy	Policy 74 Conservation Areas	-	0	+	+	0	0	0	0	0	0	0	+	0	0	0	++	++	0	0	0
<p>Modifications ensure consistency with national policy. No change in score.</p>																					

		Sustainability Appraisal Objective																			
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Plan version	Policy Name	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16	SA17	SA18	SA19	SA20
Regulation 19 Policy	Policy 79 Green Infrastructure and Natural Environment	0	0	+	+	+	0	+	0	+	0	0	+	+	?	?	+	0	0	0	0
Modified policy	Policy 79 Green Infrastructure and Natural Environment	0	0	+	+	+	0	+	0	+	0	0	+	+	0	+	+	0	0	0	0

The modifications proposed broaden the hierarchy to include other critical designations to include LGS, SINC and statutory SPA, SAC, and to ensure consistency with the London Plan.

Following appropriate assessment and development of mitigation, the HRA of the Submission Local Plan Part 1 has concluded that the Local Plan Part 1 policies will not result in adverse effects on European sites, either alone or in combination with growth in neighbouring areas. The Green Belt and MOL policies are considered to have a positive effect rather than an uncertain effect on SA15 – maintain and enhance the quality of green belt and open spaces.

Slight improvement in score. It is considered that the policy as proposed to be modified performs more favourably in relation to SA14 (Protect the ecological integrity of SSSI and Natura 2000 sites) as the previous uncertain effect has now been demonstrated to be addressed by mitigation as outlined in the HRA.

Plan version	Policy Name	Sustainability Appraisal Objective																			
		SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16	SA17	SA18	SA19	SA20
Regulation 19 Policy	Policy 80 Open Space Sport Rec	0	0	+	+	0	0	0	0	0	0	0	0	+	0	++	+	0	0	0	0
Modified policy	Policy 80 Open Space Sport Rec	0	0	+	+	0	0	0	0	0	0	0	0	+	0	++	+	0	0	0	0

Modifications proposed tighten up wording in relation to the loss of open space and/or sports facilities, requiring that any schemes proposing a loss of these facilities are refused.

No change in score.

		Sustainability Appraisal Objective																			
Plan version	Policy Name	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16	SA17	SA18	SA19	SA20
Regulation 19 Policy	Policy 81 Biodiversity & Geodiversity	0	0	0	0	0	0	0	0	0	0	0	+	-	++	0	++	0	0	0	0
Modified policy	Policy 81 Biodiversity & Geodiversity	0	0	+	0	0	0	0	0	0	0	0	+	+	++	0	++	0	0	0	0
<p>The modifications incorporate the minimum expected 10% biodiversity net gain requirement, and reference to Local Nature Recovery Strategies.</p> <p>Improvement to score based on SA13 Conserve and Enhance biodiversity and the natural environment, improving resilience to climate change, and SA3. Policy as modified is considered to perform better in improving environmental outcomes and achieving biodiversity net gain.</p>																					

		Sustainability Appraisal Objective																			
Plan version	Policy Name	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16	SA17	SA18	SA19	SA20
Regulation 19 Policy	Policy 83 Epping Forest SAC	?	0	+	0	0	0	0	0	0	0	0	0	++	++	++	++	0	0	0	0
Modified policy	Policy 83 Epping Forest SAC	0	0	+	0	0	0	0	0	0	0	0	0	++	++	++	++	0	0	0	0
<p>This policy has the potential to conflict with the achievement of SA1, however, the HRA Report has identified that mitigation can be put in place to allow housing development to go ahead at the same time as protecting Epping Forest and Epping Forest SAC. A neutral effect is therefore identified.</p>																					

		Sustainability Appraisal Objective																			
Plan version	Policy Name	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16	SA17	SA18	SA19	SA20
Regulation 19 Policy	Policy 84 Lee Valley RP	0	0	+	0	+	0	0	0	0	0	0	0	++	++	++	++	0	0	0	0
Modified policy	Policy 84 Lee Valley RP	0	0	+	0	+	0	0	0	0	0	0	0	++	++	++	++	0	0	0	0
<p>The modifications propose additional wording which set out the expectation that development proposals will not normally be granted planning permission where they pose direct or indirect adverse effects on any land or area identified with the Lee Valley Special Protection Area (SPA)/Ramsar. Development that affects the Lee Valley SPA will be expected to contribute to the mitigation of any adverse effects on the SPA.</p> <p>No change in score.</p>																					

		Sustainability Appraisal Objective																			
Plan version	Policy Name	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16	SA17	SA18	SA19	SA20
Regulation 19 Policy	Policy 87 A Zero Carbon Borough	0	0	++	0	0	+	++	++	+	0	++	0	0	0	0	0	0	0	0	0
Modified policy	Policy 87 A Zero Carbon Borough	0	0	++	0	0	+	++	++	+	0	++	0	0	0	0	0	0	0	0	0
<p>Modifications align with the latest position on Net Carbon Zero and improve clarity and remove contradiction between Clause D. and to align with London Plan Policy: S13 B</p> <p>No change in score.</p>																					

		Sustainability Appraisal Objective																			
Plan version	Policy Name	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16	SA17	SA18	SA19	SA20
Regulation 19 Policy	Policy 90 Air Pollution	0	0	+	0	0	0	+	+	+	0	+	0	0	0	0	0	0	0	0	0
Modified policy	Policy 90 Air Pollution	0	0	+	0	0	0	+	+	+	0	+	0	0	0	0	0	0	0	0	0
The modifications reflect the findings of Air Quality Study 2 meaning there is no requirement for an air quality mitigation strategy.																					
No change in score.																					

		Sustainability Appraisal Objective																			
Plan version	Policy Name	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16	SA17	SA18	SA19	SA20
Regulation 19 Policy	Policy 93 Managing Flood Risk	0	0	0	0	0	0	0	0	0	+	++	0	0	0	0	0	0	0	0	0
Modified policy	Policy 93 Managing Flood Risk	0	0	0	0	0	0	0	0	0	+	++	0	0	0	0	0	0	0	0	0
Modifications address consistency with the (Point A) NPPF para 155 and 160 and (Point B) NPPF PPG alignment with Table 3 of the National Planning Practice Guidance: Flood Risk and Coastal Change (section 25).																					
No change in score.																					

Plan version	Policy Name	Sustainability Appraisal Objective																			
		SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16	SA17	SA18	SA19	SA20
Regulation 19 Policy	Policy 97 Mon & Prom Grth Targ	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	++	++	++
Modified policy	Policy 97 Mon & Prom Grth Targ	+	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	0	++	++	++

Modifications proposed reflect updated triggers for a plan review in light of additional evidence in relation to Epping Forest SAC.

Slight improvement in score. It is considered that the policy as proposed to be modified performs more favourably in relation to SA14 (Protect the ecological integrity of SSSI and Natura 2000 sites).