Sustainability Appraisal (SA) of the
Walthamstow Area Action Plan

SA Report

December 2012

Prepared for:
Waltham Forest
Borough Council
SA of the Walthamstow Area Action Plan

REVISION SCHEDULE

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<td>December 2012</td>
<td>SA Report published for consultation alongside the Proposed Submission Walthamstow AAP</td>
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INTRODUCTION
SA of the Walthamstow Area Action Plan

1 BACKGROUND

1.1 URS is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Walthamstow Area Action Plan. SA is a mechanism for considering and communicating the likely effects of a draft plan, and alternatives, in terms of sustainability issues, with a view to avoiding and mitigating adverse effects and maximising the positives. SA of the Area Action Plan is a legal requirement.¹

2 SA EXPLAINED

2.1 It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which were prepared in order to transpose into national law the EU Strategic Environmental Assessment (SEA) Directive.²

2.1.2 The Regulations require that a report is published for consultation alongside the draft plan that 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'.³ The report must then be taken into account, alongside consultation responses, when finalising the plan.

2.1.3 The Regulations prescribe the information that must be contained within the report, which for the purposes of SA is known as the ‘SA Report’. Essentially, there is a need for the SA Report to answer the following four questions:

1. What's the scope of the SA?
   - This question must be answered subsequent to a review of the sustainability context and baseline, and consultation with designated environmental authorities.

2. What has Plan-making / SA involved up to this point?
   - Preparation of the draft plan must have been informed by at least one earlier plan-making / SA iteration at which point alternatives are assessed.

3. What are the appraisal findings at this current stage?
   - i.e. what are the likely significant effects of the draft plan and what changes might be made in order to avoid or mitigate negative effects and enhance the positives.

4. What happens next?
   - In particular, there is a need to present ‘measures envisaged concerning monitoring’.

2.1.4 These questions are derived from Schedule 2 of the Regulations, which present the information to be provided within the report under a list of ten points. Table 1.1 makes the links between the ten Schedule 2 requirements and the four SA questions. Appendix I of this SA Report explains the process of ‘making the links’ in more detail.

3 STRUCTURE OF THIS SA REPORT

3.1 The four SA questions are answered in turn across the four subsequent parts of this Report.

¹ The Area Action Plan is a ‘Local Plan’ as defined by the Town and Country Planning (Local Planning) (England) Regulations 2012 and hence an SA Report must be published for consultation alongside the ‘Proposed Submission’ Plan document.
² Directive 2001/42/EC
³ Regulation 12(2)
### Table 1.1: Questions that must be answered within the SA Report

<table>
<thead>
<tr>
<th>SA REPORT QUESTION</th>
<th>SUB-QUESTION</th>
<th>CORRESPONDING REQUIREMENT (THE REPORT MUST INCLUDE...)</th>
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<tbody>
<tr>
<td><strong>What’s the scope of the SA?</strong></td>
<td>What’s the Plan seeking to achieve?</td>
<td>● An outline of the contents and main objectives of the plan</td>
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<td>What’s the sustainability ‘context’?</td>
<td>● The relationship of the plan with other relevant plans and programmes</td>
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<td>● The relevant aspects of the current state of the environment</td>
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<td>● Any existing environmental problems / issues which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance</td>
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<td><strong>What has Plan-making / SA involved up to this point?</strong></td>
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<td>● An outline of the reasons for selecting the alternatives dealt with (and thus an explanation of why the alternatives dealt with are ‘reasonable’)</td>
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<td>● The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting preferred alternatives / a description of how environmental objectives and considerations are reflected in the draft plan.</td>
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<tr>
<td><strong>What are the appraisal findings at this current stage?</strong></td>
<td></td>
<td>● The likely significant effects on the environment associated with the draft plan</td>
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<td>● The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan</td>
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<td><strong>What happens next (including monitoring)?</strong></td>
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<td>● A description of the measures envisaged concerning monitoring</td>
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PART 1: WHAT’S THE SCOPE OF THE SA?
4 INTRODUCTION (TO PART 1)

4.1.1 This is Part 1 of the SA Report, the aim of which is to introduce the reader to the scope of the SA. In particular, and as required by the Regulations, this Chapter answers the series of questions below.

Table 4.1: Scoping questions answered

<table>
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<th>SCOPING QUESTION</th>
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4.2 Consultation on the scope

4.2.1 The Regulations require that: ‘When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies’. In England, the consultation bodies are Natural England, The Environment Agency and English Heritage. As such, these authorities were consulted on the scope of this SA in 2008. This consultation was achieved by providing a ‘Scoping Report’ for their comment. The Scoping Report was subsequently finalised and is now available online @ http://www.walthamforest.gov.uk/documents/wf-sa-scoping-report-finaloct08.pdf

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4 Environmental Assessment of Plans and Programmes Regulations 2004

5 In-line with Article 6(3) of the SEA Directive, these consultation bodies were selected because ‘by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes’.
5 WHAT IS THE PLAN SEEKING TO ACHIEVE?

The SA Report must include…

- An outline of the contents, main objectives of the plan

5.1.1 Walthamstow Town Centre is a vibrant urban centre that is at the heart of the Borough of Waltham Forest, both geographically and economically. However, while Walthamstow has a number of strengths it also faces a number of challenges. The centre is under performing and has been in long-term commercial decline due to departing investment, population churn, a poor shopping offer and lack of competitiveness with neighbouring town centres. The aim is to reverse this decline and bring about the centre’s regeneration. The Walthamstow Area Action Plan (AAP) will be an essential part of this process.

Objectives of the AAP

5.1.2 The following objectives are the basis for the detailed approach set out within the AAP:

1. Promoting Walthamstow’s unique retail offer by building on its historic market, high proportion of independent retailers, the large percentage of young population, and cultural diversity of the local community;
2. Improving the quality of Walthamstow’s retail offer by seeking to improve the range and quality of goods sold within the centre;
3. Creating a vibrant, attractive and competitive town centre by encouraging a wide mix of uses such as new retail, leisure, tourism and community to ensure the centre is a place to shop, work, spend leisure time and live;
4. Creating and establishing a sustainable neighbourhood by providing a range of quality new homes in terms of tenure, size and affordability to meet the housing needs of the local community;
5. Improving accessibility to the centre by improving the quality and frequency of the existing transport network and promoting new transport improvements;
6. Creating a more sustainable centre by encouraging sustainable forms of transport such as walking and cycling, incorporating the highest levels of sustainable design in new development and establishing a decentralised energy network(s) within the centre;
7. Creating a high quality accessible and inclusive environment, especially in the evenings in order to further encourage the development of the night-time economy within the centre;
8. Creating an attractive and distinctive centre with high quality design of buildings, public spaces and protecting and enhancing the centres heritage and other important areas;
9. Diversifying and balancing the centres economy in order to create additional jobs, increase training opportunities, provide additional office space to support local business and encouraging the development of emerging sectors such as hi-tech, research and development, and creative industries; and
10. Supporting planned growth with the appropriate level of social infrastructure to meet the needs of the local community.

5.2 What’s the plan not trying to achieve?

5.2.1 It is important to emphasise that the plan will be strategic in nature. Even the allocation of sites should be considered a strategic undertaking, i.e. a process that omits consideration of some detailed issues in the knowledge that these can be addressed further down the line (through the planning application process). The strategic nature of the plan is reflected in the scope of the SA.
6 WHAT’S THE SUSTAINABILITY ‘CONTEXT’?

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<th>The SA Report must include…</th>
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<tr>
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<tr>
<td>● The relevant environmental protection objectives, established at international or national level</td>
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6.1 Introduction

6.1.1 An important step when seeking to establish the appropriate ‘scope’ of an SA involves reviewing ‘sustainability context’ messages (e.g. issues, objectives or aspirations) set out within relevant published plans, policies, strategies and initiatives (PPSIs). Sustainability context messages are important, as they aid the identification of the ‘key sustainability issues’ that should be a focus of the SA. Key messages from this review are summarised below.

6.2 The National Planning Policy Framework

6.2.1 In March 2012 the National Planning Policy Framework (NPPF) was published. The NPPF, read as a whole, constitutes ‘the Government’s view of what sustainable development in England means in practice for the planning system. The NPPF supersedes most PPSs and PPGs. The following is a summary of the new guidance included in the NPPF that is of relevance to this SA.

**Air quality**

6.2.2 New and existing developments should be prevented from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of air pollution. This includes taking into account the presence of Air Quality Management Areas and cumulative impacts on air quality.

**Biodiversity and open space**

6.2.3 Impacts on biodiversity should be minimised, with net gains in biodiversity to be provided wherever possible. To contribute to national and local targets on biodiversity, planning should promote the ‘preservation, restoration and re-creation of priority habitats, ecological networks’ and the ‘protection and recovery of priority species’. High quality open spaces should be protected or their loss mitigated, unless a lack of need is established.

**Climate change adaptation**

6.2.4 Planning authorities should take account of the long term effects of climate and ‘adopt proactive strategies’ to adaptation, with new developments planned to avoid increased vulnerability to climate change impacts.

6.2.5 In terms of flooding, development should be directed away from areas highest at risk and should not be allocated if there are ‘reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding’. The NPPF states that local planning authorities should avoid ‘inappropriate development in vulnerable areas or adding to the impacts of physical changes to the coast’ in order to reduce the risk posed from coastal change.

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Climate change mitigation

6.2.6 Supporting the ‘transition to a low carbon future in a changing climate’ is regarded as a ‘core planning principle’. A key role for planning in securing reduced GHG emissions is envisioned, with specific reference made to meeting the targets set out in the Climate Change Act 2008\(^7\). Specifically, planning policy should support the move to a low carbon future through:

- planning for new development in locations and ways which reduce GHG emissions; and
- positively promoting renewable energy technologies and considering identifying suitable areas for their construction.

Community: Health, Crime and Social equity

6.2.7 The social role of the planning system is defined as ‘supporting vibrant and healthy communities’, with a ‘core planning principle’ being to ‘take account of and support local strategies to improve health, social and cultural wellbeing for all’.

Cultural heritage

6.2.8 The planning system should protect and enhance valued landscapes. Heritage assets should be recognised as an ‘irreplaceable resource’ that should be conserved in a ‘manner appropriate to their significance’, taking account of ‘the wider social, cultural, economic and environmental benefits’ of conservation, whilst also recognising the positive contribution new development can make to local character and distinctiveness.

Economy & employment

The contribution the planning system can make to building a strong, responsive economy is highlighted. This should include ‘identifying and coordinating development requirements, including the provision of infrastructure’. There is a need to support new and emerging business sectors, including positively planning for ‘clusters or networks of knowledge driven, creative or high technology industries’.

Education

6.2.9 Ensuring that there is a ‘sufficient choice of school places’ is of ‘great importance’. Local planning authorities must ‘work with other authorities and providers’ in order to access the current ‘quality and capacity’ of infrastructure for education, plus its capability of meeting ‘forecast demand’.

Good design

6.2.10 The NPPF attaches great importance to the design of the built environment. It explains how good design is a key aspect in sustainable development, and how development should improve the quality of the area over its lifetime, not just in the short term. Good architecture and landscaping are important, with the use of design codes contributing to the delivery of high quality outcomes. Design should reinforce local distinctiveness, raise the standard more generally in the area and address the connections between people and places.

Housing

6.2.11 Local planning authorities should meet the ‘full, objectively assessed need for market and affordable housing’ in their area. To create ‘sustainable, inclusive and mixed communities’ authorities should ensure affordable housing is provided.

\(^7\) The Climate Change Act 2008 sets targets for greenhouse gas (GHG) emission reductions through action in the UK of at least 80% by 2050, and reductions in CO2 emissions of at least 26% by 2020, against a 1990 baseline.
Soil and contamination

6.2.12 The planning system prevent new or existing development from being ‘adversely affected’ by the presence of ‘unacceptable levels’ of soil pollution or land instability and be willing to remediate and mitigate ‘despoiled, degraded, derelict, contaminated and unstable land’ wherever appropriate.

6.2.13 Whilst there is no longer a national requirement to build at a minimum density, there is a need to ensure that effective and efficient use of available land is made when permitting residential development. Planning policies and decisions should ‘encourage effective use of land’ through the reuse of land which is previously developed, ‘provided that this is not of high environmental value’.

Town centre vitality

6.2.14 The NPPF promotes competitive town centre environments and encourages positive planning policies to support them. The need to enhance and retain markets is also outlined. Edge of town developments should only be considered where they have good access. This should be followed with an impact assessment to ensure the town centre remains viable in the long term.

Transport and accessibility

6.2.15 Planning for transport and travel will have an important role in ‘contributing to wider sustainability and health objectives’. To minimise journey lengths for employment, shopping, leisure and other activities, planning policies should aim for ‘a balance of land uses’. Wherever practical, key facilities should be located within walking distance of most properties.

6.3 Supplementing the NPPF

Waltham Forest Working Together Community Strategy 2012

6.3.1 In order to achieve the vision of the strategy the Local Strategic Partnership will seek to:

- Decrease crime and improve the safety and quality of the environment
- Improve the health and well-being of local people
- Improve learning opportunities to help individuals achieve their potential
- Improve the local economy and infrastructure
- Increase community understanding and participation
- Increase the number of schools with 20% or more pupils eligible for free school meals participating in the Waltham Forest Healthy Schools scheme from 21 to 56 by 2006.
- Reduce the gap between infant mortality in Waltham Forest and the national average by 10% by 2010.
- Reduce the under-18 conception rate by 50% by 2010 as part of a broader sexual health strategy.
- Establish an integrated children’s service to improve the lives of disabled children and their families by September 2005.
- Develop and implement a strategy to address worklessness, and reduce the gap between the Borough’s unemployment rate and that of each of the Neighbourhood Renewal wards
- Support emerging dynamic sectors of growth and innovation, such as green and creative industries, and encourage information technology and research, and the development of business intelligence in London.
• Sustain and promote the rapid expansion of leisure and cultural industries that are both key to London’s economy and are the most rapidly expanding sectors of its population’s expenditure.


6.3.2 The London Plan sets out a number of objectives that will contribute towards making London a better city for people to live in. These include to:

• Improve the quality of Londoners’ lives and the environment through better designed buildings and public spaces.

• Address the differing needs of London’s diverse population.

• Provide the spatial framework for the Mayor’s Culture Strategy and enhance the cultural assets of London, encourage development of new facilities in new areas, building upon racial and cultural differences that reinforce London’s diversity.

• Improve the availability of quality local services particularly education and health.

• Strengthen the diversity of London’s economy, provide for small and ethnic minority businesses and encourage local enterprise, including social enterprise, throughout London.

• Support emerging dynamic sectors of growth and innovation, such as green and creative industries, and encourage information technology and research, and the development of business intelligence in London.

• Sustain and promote the rapid expansion of leisure and cultural industries that are both key to London’s economy and are the most rapidly expanding sectors of its population’s expenditure.

• Improve and expand London’s public transport through increased and phased investment in services and infrastructure

• Integrate development with public transport to ensure that there is a proper fit between development and the capacity of the public transport network to service it over the period on the plan, taking appropriate opportunities to intensify the use of land where current or future transport capacity allows and to connect Londoners to employment opportunities.

• Tackle congestion through levels of restraint of car use appropriate to different parts of London and the provision of alternatives, including the improvement of access on foot and cycling and better and safer facilities for pedestrians and cyclists.

• Achieve targets for new housing, including affordable housing, that will cater for the needs of London’s existing and future population and give more people who need it access to homes they can afford.
7 WHAT’S THE SUSTAINABILITY ‘BASELINE’ AT THE CURRENT TIME?

The SA Report must include…

- The relevant aspects of the current state of the environment
- The environmental characteristics of areas likely to be significantly affected

7.1 Introduction

7.1.1 Another important step when seeking to establish the appropriate ‘scope’ of an SA involves reviewing the situation now for a range of sustainability issues. Doing so helps to enable identification of those key sustainability issues that should be a particular focus of the appraisal, and also helps to provide ‘benchmarks’ for the appraisal of significant effects.

7.1.2 A review of the sustainability baseline is presented below.

Air quality

7.1.3 The entire Borough has been declared an Air Quality Management Area (AQMA) as a result of high levels of NO₂ and PM₁₀. Although background locations achieved the target concentrations for NO₂ in 2005 the annual average objective of 40μg/m³ at roadside locations has yet to be achieved.

Biodiversity and open space

7.1.4 Waltham Forest contains two sites of international importance for nature conservation:

- Lea Valley – designated Special Protection Area (SPA) and Ramsar
- Epping Forest – designated Special Area for Conservation (SAC)

7.1.5 There are also four Sites of Special Scientific Interest within the Borough, which are: Chingford Reservoirs; Epping Forest (constituent SSSI of Epping Forest SAC); Walthamstow Marshes; and Walthamstow Reservoirs (constituent SSSI of Lea Valley SPA)

7.1.6 Important habitats in Waltham Forest, as identified in the Waltham Forest Biodiversity Action Plan, include:

- Acid Grasslands Habitat
- Churchyard and Cemeteries
- Floodplain Grassland, Marsh and Reed Bed Habitat
- Gardens and Allotments Habitat
- Grasslands, Meadows and Pastures Habitat
- Hedgerows and Green Lanes Habitat
- Woodland and Urban Forest Habitat
- Wood Pasture Habitat
- Rivers and Streams Habitat
- Parks, Open Spaces and Brownfield Sites Habitat
- Open Water Biodiversity
Climate change

7.1.7 Emissions of carbon expressed as ‘per capita’ (per residents) allow a comparison across areas. Per capita CO2 emissions for Waltham Forest are significantly below those for the UK as a whole and are less than those for the Greater London area.

Community: Health, Crime and Social Equity

7.1.8 The population of the inner catchment area of Walthamstow Town Centre is 88,805 whilst the population of the wider outer zone was nearly 200,000, providing a total catchment area of nearly 290,000 people. The demographic structure of the inner catchment area has a younger population than Waltham Forest as a whole and is also younger than London and England. Nearly 77% of the inner catchment area are younger than 45 years old.

7.1.9 Walthamstow is very ethnically diverse. As the Walthamstow Socio-Economic Masterplan (2007) demonstrates, the inner catchment area has a larger proportion of non-white residents than either the Borough as a whole or London. The proportion of Black or Black British residents is similar to the Borough average but the proportion of Asian or Asian British residents is higher within the inner catchment area than the Borough as a whole. Walthamstow Socio-Economic Masterplan (2007) demonstrates that in terms of religion, the highest percentages of residents are Christian, with the second highest percentage being Islam.

7.1.10 In terms of the overall measure of multiple deprivation (IMD 2010), Waltham Forest ranks 15th most deprived among the 326 local authorities in England. Its position has declined from 26th in 2007.

Cultural heritage

7.1.11 In Waltham Forest there are 104 Statutory Listed Buildings (12 x Grade 2*, 92 x Grade 2), of which six are on the English Heritage Buildings at Risk Register. The Council also has a ‘local list’ of buildings, which do not have the same statutory protection, but which the Council will seek to conserve and enhance as far as possible; there are 141 Locally Listed Buildings.

7.1.12 The following areas have been designated as Conservation Areas:

- The Green, Chingford
- Ropers Avenue/Inks Green, Highams Park
- Woodford Green
- Leucha Road, Walthamstow
- Walthamstow St. James
- St Mary's Church (Walthamstow Village)
- Forest School
- Orford Road/Eden Road/ Grosvenor Park Road, Walthamstow
- Whipps Cross Road/Forest Glade, Leytonstone
- Browning Road, Leytonstone
- Thornhill Road, Leyton

7.1.13 In addition to the Higham’s Estate, Chingford is designated as an Area of Special Character.
7.1.14 73.1% of residents in the Borough are economically active (June 2012). This figure is lower than the London average (75%) and the National average (76.6%)\(^8\). The unemployment rate has risen since the preparation of the 2008 Scoping Report, with the figure in Waltham Forest rising from 6.5% to 11.8% over that time. This is proportionally much higher than the London figure which has risen from 7.3% to 9.2%\(^9\). Earnings by resident (£540) are lower than the rest of London (£610), but are above the National average (£503)\(^10\).

7.1.15 In 2005 there were 1110 new start-up businesses in Waltham Forest. By 2010 only 35.6% of these had survived, lower than both the London average (39.7%) and the Great Britain average (44.2%)\(^11\).

7.1.16 There has been a marked improvement in educational attainment for Waltham Forest in recent years. The number of people with ‘no qualifications’ has reduced from 17.4% to 11.3% and the number of people with ‘level 4 and above’ qualifications has risen from 25.8% to 38.6%. These results however are still below that of London at all levels (NVQ1-4), and below the National average for all qualifications except NVQ4 and above\(^12\).

7.1.17 Results at A Level / Key Stage 5 (pupils aged 16 to 18) are also lower in Waltham Forest than they are in England and London. For 2011, the average point score per pupil in Waltham Forest is 691 compared to 745.9 for England and 712.8 for London. Since 2007 the average point score per pupil in Waltham Forest has risen from 643.4 to 691 however\(^13\).

7.1.18 In 2011, 78% of dwellings were in private sector ownership (owner occupied or private rented), with social housing accounting for 22% of dwellings. Roughly 50% of social housing belongs to the local authority, with the other half being let Registered Social Landlords (RSL).

7.1.19 Between 2004 and 2009 home ownership fell from 60% to 49% in Waltham Forest\(^14\). The average house price in Waltham Forest in September 2012 was £256,029. This is an decrease on the 2008 figure, which was £271,517\(^15\).

7.1.20 Waltham Forest is an urban area which contains areas of Metropolitan Green Belt and Metropolitan Open Land. In addition to these areas there are a large number of other open spaces in the Borough such as parks, playing fields and allotments. These areas of open space make an important contribution to the landscape and townscape of the Borough. The Borough contains approximately 780 acres of parks and green spaces, much of which is managed by the Borough and provides an opportunity for residents to come into contact with the natural heritage.

7.1.21 In terms of the built environment Waltham Forest comprises several ‘Conservation Areas’. These areas have been identified as making an important contribution to local distinctiveness and historic character. In relation to new development in the built environment the Council raises awareness of, and rewards, good quality design through annual Design Awards.

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\(^8\) Nomis web ONS (2012)
\(^9\) Ibid.
\(^10\) ONS annual survey (2011)
\(^11\) Business Demography ONS (2010)
\(^12\) Nomis web ONS (2012)
\(^13\) Department for Education Performance Tables 2011
\(^14\) GLA / 2011 Waltham Forest Housing Needs survey and Strategic Housing market assessment
\(^15\) Lang Registry
Transport and accessibility

7.1.22 The public transport network consists principally of two railway services, two underground services and a large network of bus and night bus services. The Chingford to Liverpool Street Line is a radial rail line that forms a main commuter route to Central London. The Barking to Gospel Oak Line (GOBLIN) is an outer London orbital rail route that has recently been taken over by TfL as part of the London Overground network. The London Underground Central Line serves the south of the Borough whilst the Victoria Line runs to Walthamstow Central and serves the middle of the Borough.

7.1.23 The Borough is well served by buses, with the network centred on the recently modernised Walthamstow Bus Station which is now the third busiest bus station in London. In total there are 37 bus routes serving the borough, including six night bus routes. The Council is working with TfL London Buses on the possible extension of several routes and new initiatives, including third generation bus priority.

7.1.24 Provision for cyclists within the Borough is good with on road cycle lanes covering 32km of main roads and 32km of quiet cycle routes on residential roads and through parkland and forest. Secure cycle parking is provided at three underground stations within the Borough, namely Walthamstow Central, Leytonstone and Leyton, and at other key locations such as leisure centres. Cycle training is also offered free to all adults living, working or studying in the Borough. In addition, cycle parking facilities are required as part of all new developments.
8 WHAT’S THE BASELINE PROJECTION?

The SA Report must include…

- The likely evolution of the current state of the environment without implementation of the plan

8.1.1 Just as it is important for the scope of SA to be informed by an understanding of current baseline conditions, it is also important to ensure that thought is given to how baseline conditions might ‘evolve’ in the future under the ‘no plan’ / ‘business as usual’ scenario. Doing so helps to enable identification of those key sustainability issues that should be a particular focus of the appraisal, and also helps to provide ‘benchmarks’ for the appraisal of significant effects.

8.1.2 The following bullets list a range of ‘future baseline’ issues that should be a focus of SA and provide benchmarks for the identification of significant plan effects:

- The large percentage of under 45s in the inner catchment area and the rising unemployment rate seen from 2008 is likely to continue to without the provision of new employment sites. The current 73% of economically active adults could become a smaller figure in the future.

- The population of Waltham Forest is expected to increase although the increases are expected to be less than the increases for London and Outer London. There would be an increased demand on the provision of services and facilities, and on housing as a consequence of this increase.

- Without provision of new homes and employment sites through the AAP, Waltham Forest would see an ageing population. An ageing population will require a wider range of services within easily accessible distance and transport mode of their homes. The provision and improvement of public transport is therefore an important sustainability issue.

- Without the AAP policies, applications for new development would still come forward, but there would be less certainty that these would be sustainable and viable, and this could lead to uncertainty and delayed provision of important infrastructure (e.g. pedestrian and cycle access routes and other sustainable transport measures). Reduced rates of development could mean that environmental impacts of development are avoided, however continued car dependency would result in continued air pollution and greenhouse gas emissions at unsustainable levels.

- Pedestrians and cyclists are top of the Council’s hierarchy of road users, with the Council considering walking and cycling to be excellent modes of transport for trips of up to 2km and 5km respectively and for linking up other modes of transport. The Council is currently preparing a Walking Strategy for the Borough with the aim of identifying measures to increase the level and number of people walking. Street lighting and traffic calming measures are also implemented as required which benefit pedestrians and other road users.

- There is an identified shortfall between house prices and the potential mortgages that could be obtained by those earning an average salary. This means that it is becoming increasingly difficult for those on lower incomes to purchase a property and it is unlikely that the current situation will change, especially given that the unemployment rate rising also.

- Waltham Forest ranks as the 15th most deprived out of 326 local authorities nationally. This represents an increase in relative deprivation from 2007. Without the AAP it can be assumed that problems will continue. For example, crime could continue to be an issue and vacant buildings could contribute to a worsening image.
9 WHAT ARE THE KEY ISSUES THAT SHOULD BE A FOCUS OF THE APPRAISAL?

The SA Report must include…
- Any existing environmental problems which are relevant to the plan

9.1 Introduction

9.1.1 Drawing on the review of the sustainability context and baseline, the 2008 SA Scoping Report was able to identify a range of sustainability objectives and issues that should provide a methodological framework for the appraisal, ensuring it remains focused. These are listed below:

9.2 Sustainability objectives

1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings
2. Reduce crime and the fear of crime
3. Improve standard of health and wellbeing of those who live and work in the borough
4. Increase the provision of and access to community facilities to meet local cultural, recreational and social needs
5. Improve educational attainment in schools
6. Improve opportunities for access to education and training for all residents
7. Reduce the overall level of deprivation
8. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system
9. Reduce production of waste and increase recycling
10. Reduce greenhouse gas emissions
11. Conserve energy
12. Improve air quality through a reduction in traffic-based emissions
13. Improve water quality and ensure the efficient use of water resources
14. Reduce the risk of flooding
15. Reduce contamination and safeguard soil quality and quantity
16. Make the best use of previously developed land (PDL) and existing buildings
17. Conserve and enhance biodiversity
18. Protect the ecological integrity of Natura 2000 sites
19. Maintain and enhance the quality of the green belt and open space areas.
20. Conserve and, where appropriate, enhance the historic environment
21. Maintain and enhance the vitality and viability of the borough’s town centres
22. Improve the local economy by attracting inward investment
23. Maintain stable levels of employment in the borough

16 The Scoping Report contains a more detailed discussion of the key issues.
9.3 Sustainability Issues

Air
- Air pollution from the strategic road network is an issue across the Borough and, more recently, is affecting background locations.

Biodiversity
- Parts of Epping Forest are in an ‘unfavourable’ or ‘unfavourable/declining’ condition.

Crime and safety
- Crime levels are generally higher in Waltham Forest than nationally.

Economy
- Low levels of economic growth in the Borough.
- Declining industrial sectors and under-representation of growth sectors.

Employment and Skills
- Average salaries for those working in Waltham Forest are lower than average salaries for those living in the Borough. This could affect the Borough’s ability to attract investment.
- Unemployment levels are higher than the average for Great Britain.
- Educational attainment is relatively low and a high proportion have no qualifications.

Housing
- There is a disparity between the cost of housing and the amount that people are able to borrow to purchase a home, which prevents access to the property market.
- There is a potential shortfall in the provision of family accommodation.
- There is a shortfall of affordable housing to meet the requirements of those in housing need.

Human Health
- Life expectancy is lower than the average for London and the rest of the country.
- Health inequalities for Black and Minority Ethnic groups.
- The southern part of the Borough is subject to higher levels of poor health, which has been associated with deprivation, poverty and overcrowding.

Landscape and Townscape
- Development pressure could lead to the loss of open space or recreation facilities.

Transport
- Reliance on the private car as the main mode of transport, contributing to air pollution, greenhouse gas emissions and congestion.
- Increasing car ownership, personal wealth and population is expected to place further demands on the local transport network leading to increased congestion.
- Expansion of the transport network could require significant land-take.

Waste
- The amount of waste produced per person is not decreasing over time.
- Although levels of recycling are increasing over time the proportion of waste recycled is not yet meeting Government targets.
PART 2: WHAT HAS PLAN-MAKING / SA INVOLVED UP TO THIS POINT?
10  INTRODUCTION (TO PART 2)

The SA Report must include…

- An outline of the reasons for selecting the alternatives dealt with
- The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting preferred alternatives / a description of how environmental objectives and considerations are reflected in the draft plan

10.1.1 The ‘story’ of plan-making / SA up to this point is told within this Part of the SA Report. Specifically, this Part of the SA Report describes how:

- As an interim plan-making / SA step there was an appraisal of alternative approaches to addressing a range of area-wide policy issues;
  - and how the Council then took account of these interim SA findings when preparing the Proposed Submission version of the AAP.

- As an interim plan-making / SA step there was an appraisal of alternative approaches to developing ‘Opportunity Sites’;
  - and how the Council then took account of these interim SA findings when preparing the Proposed Submission version of the AAP.

- As an interim plan-making / SA step there was an appraisal of a ‘working draft’ plan, i.e. the approach presented within the August 2011 ‘Preferred Options’ consultation document;
  - and how the Council then took account of these interim SA findings when preparing the Proposed Submission version of the AAP.

11  ALTERNATIVE APPROACHES TO ADDRESSING AREA-WIDE POLICY ISSUES

11.1.1 This Chapter presents a consideration of alternatives for the following AAP policy issues:

- Housing growth
- Housing density
- Affordable housing
- Unit mix
- Retail
- Hot food takeaways, estate agents, betting shops and off licences
- Pubs
- Leisure, entertainment, culture and tourism
- Employment
- Transport improvements
- Sustainable transport
- Car and cycle parking
- High quality environment
- Design and place making
- Social infrastructure
- Decentralised energy
- Access to sites of nature conservation

11.1.2 For each issue this Chapter summarises the interim SA findings that were fed-back to the Council; and also explains the degree to which these findings are reflected in the Council’s preferred approach as set out within the Proposed Submission AAP document.

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17 These findings and recommendations were presented within the Interim SA Report published for consultation alongside the Walthamstow Town Centre AAP Preferred Options document (August 2011).
11.2 Housing growth

Alternatives considered

1. Up to 2,000 new homes; develop opportunity sites; housing as part of mixed-use schemes; infill development; and housing above shops or upper floors.

2. Up to 1,000 homes. No promotion of housing above shops.

Summary of appraisal findings

11.2.1 In the long term, (1) would provide a significant positive contribution to the Borough's housing target and housing need (even though it may be difficult to provide family homes, these will still be considered on a site by site basis) and enhance the vitality and viability of the Town Centre. Providing new housing in Walthamstow Town Centre is also likely to contribute positively to reducing crime and the fear of crime and increasing access to community facilities.

11.2.2 (2) would also contribute positively to the same sustainability objectives described above in relation to (1); however, significant positive effects would be unlikely given the lower quantum of growth proposed.

11.2.3 Appendix II presents appraisal findings in full.

The Council’s preferred approach

11.2.4 The Council’s preferred approach is to seek to deliver up to 2,000 new homes in the centre. In doing so, Opportunity Area sites for housing will be developed, housing and HMOs on upper floors and above shops will be encouraged, and housing will be provided as part of mixed-use schemes. This approach is in-line with the Interim SA findings.

11.3 Housing density

Alternatives considered

1. Densities between 200-700 hrha; higher densities surrounding Walthamstow central & St James Street stations; and lower densities near other low density residential areas and near Leucha Road and Walthamstow St James conservation areas.

2. Densities over 700 hrha in the town centre.

3. Build housing at lower densities up to 500 hrha.

Summary of appraisal findings

11.3.1 (1) would likely result in positive effects in terms of ‘making the most effective and efficient use of land and buildings’. This approach recognises that high density housing can have drawbacks, and seeks to mitigate this by: a) identifying that there will also be a need for areas of lower density development; and b) promoting high density in suitable locations. Aiming to ensure that new housing schemes propose densities appropriate to the character and context of Walthamstow would also likely have positive effects in terms of the historic environment. Also, allowing for higher densities in highly accessible locations (PTAL score 6a) would likely reduce the need for a private car with positive benefits in terms of improving air quality.

11.3.2 (2) would also likely have significant positive effects in terms of making the most effective and efficient use of land. However, effects in terms of the historic environment are uncertain. Much would depend on implementation at the project level, but it is possible that there could be negative effects in terms of loss of historic character.
11.3.3 (3), is in accordance with the Core Strategy (Policy CS2) and the draft replacement London Plan density matrix. However as Walthamstow is a location where higher housing densities are considered to be acceptable, to build up to a density of 500 hrha where it would be possible to build at higher densities would not make the best use of previously developed land.

11.3.4 Appendix III presents appraisal findings in full.

The Council's preferred approach

11.3.5 The Council has chosen not to address this issue through a specific policy within the AAP. Rather, the Council will apply policy DM8 – Housing Quality and Accessibility, which seeks to, “optimise housing densities in accordance with London Plan density matrix table 3.2” to all new developments in the AAP area.

11.4 Affordable housing

Alternatives considered

1. Maximise affordable housing (AH) in the centre; at least 50% (site-by-site basis) subject to viability; where viability reduces AH below 50% - shortfall to be made up by an off site payment in lieu; and tenure split of 60% social rented and 40% intermediate, particularly shared ownership.

2. AH on site reduced to below 50%.

3. Allow a higher proportion of intermediate housing in the centre.

Summary of appraisal findings

11.4.1 (1) would contribute to meeting local housing needs by maximising affordable housing in the centre by specifying 50% affordable housing on site (subject to viability on a site by site basis), requiring any shortfall to make a one off site payment in lieu and providing a tenure split of 60% Social Rented and 40% intermediate housing. In the short term, however, it may be difficult to meet the affordable housing target due to viability.

11.4.2 Reducing the level of affordable housing sought on site to below 50% (2) in order to improve development viability is incompatible with the Borough wide affordable housing target and would not be likely to contribute significantly to addressing affordable housing need in Walthamstow.

11.4.3 (3) would likely have a positive impact on meeting local housing needs by allowing a higher proportion of intermediate housing in the centre to increase home ownership opportunities for people who cannot afford to buy a home outright as the Borough contains a high proportion of rented homes.

11.4.4 Appendix IV presents appraisal findings in full.

The Council’s preferred approach

11.4.5 The Council has chosen not to address this issue through a specific policy within the AAP. Rather, the Council will apply policies CS2 - Housing Quality and Choice and DM3 – Affordable Housing, which seek to, “maximise the number of quality affordable in the borough by aiming to provide at least 50% of homes as affordable over the plan period”, to all new developments within the AAP boundary.
11.5 **Unit mix**

**Alternatives considered**

1. Negotiate unit mix on a site by site basis (focus on family housing on sites close to west of the centre close to St James Street station); and where family housing is provided, locate on the ground floor where it has access to private usable amenity space.

2. Housing mix of: 10% 1 bed, 40% 2 bed, 40% 3 bed & 10% one bed for market housing; and 10% 1 bed, 30% 2 bed, 50% 3 bed & 10% 4 bed for affordable tenures in accordance with emerging Development Management Polices.

3. Seek a higher proportion of family homes (three bed plus) across all tenures.

**Summary of appraisal findings**

11.5.1 Through (1), unit mix would be decided on a site by site basis. This approach would have an uncertain effect in terms of meeting local housing needs as unit mix would be negotiated according to each site instead of contributing toward meeting a particular target. Focusing family housing in particular areas and locating it on the ground floor to allow for private usable amenity space would contribute to maintaining and enhancing the quality of open space areas and hence contribute to improving health and wellbeing.

11.5.2 The housing mix identified as part of (2) is in accordance with emerging Development Management Polices. This approach would assist with meeting housing mix needs Borough wide through setting proportions for market and affordable housing. However this may not be appropriate for the AAP area.

11.5.3 Seeking a higher proportion of family homes (3) across all tenures would prioritise one housing need over others. It is uncertain whether the Town Centre is the appropriate area in the Borough to prioritise family homes above others as the success of this approach would also be dependent on sites and viability.

11.5.4 At the interim appraisal stage, the following **recommendation** was made:

- More evidence should be provided in relation to housing need in order to justify the preferred housing mix.

11.5.5 **Appendix V** presents appraisal findings in full.

**The Council’s preferred approach**

11.5.6 The Council has chosen not to address this issue through a specific policy within the AAP. Rather, the Council will apply policies CS2 – Housing Quality and Choice, part C – Mixed and Balanced Communities and DM 5 – Housing Mix, which broadly seeks, “a range of homes sizes and tenures”, to all new developments within the AAP boundary.

11.6 **Retail**

**Alternatives considered**

1. Develop opportunity sites for new retail uses; include retail as part of mixed use development; allow the extension of sites to increase retail floorspace; consolidate retail development within the centre in the designated primary and secondary retail frontages; upgrade and further diversify overall range, mix and quality of uses within the centre; promote, support and enhance the development of Walthamstow Market; and ensure no over concentration or clustering of Hot Food Takeaways, betting shops, estate agents and off licences.

2. Extend the town centre boundary to incorporate additional sites which could provide retail uses.
Summary of appraisal findings

11.6.1 Upgrading and diversifying the existing retail offering and targeted development of opportunity sites (1) would help to support and consolidate the town centre’s vitality while providing a catalyst for attracting inward investment. The extent to which site extensions would affect the quality of open space is unclear and would depend on site specific design; however, increased retail floorspace and the development of the market should provide improved employment opportunities.

11.6.2 Extension of the town centre boundary (2) would have the potential to ‘dilute’ the existing diverse and independent retail offering by drawing investment to new areas away from the existing town centre. However, additional sites for retail use, particularly if of sufficient size to support ‘high end’ retailers could provide opportunities to a wider variety of retailers and help support greater inward investment.

11.6.3 At the interim appraisal stage, the following recommendation was made:
- Promote the integration of high end retailers within the existing centre to maximise diversity and vitality of retail offer while ensuring valued local retail provision is supported.

11.6.4 Appendix VI presents appraisal findings in full.

The Council’s preferred approach

11.6.5 The Council’s preferred approach is to develop opportunity sites for retail uses; create a new anchor development; require ‘larger’ retail units in any extension to Selborne Walk; encourage retail uses of the periphery of the centre and the re-use of vacant units; resist the sub-division of larger Primary Frontages units; and support the development of Walthamstow market.

11.6.6 This approach is similar to that outlined in (1), for which a number of positive effects were predicted by the Interim SA. The changes made to WTC3, reflect the need to build on the factors that give Walthamstow its uniqueness in order to create a town centre with a unique and alternative retail offer (to other competing centres) which has a wide ranging appeal.

11.7 Hot food takeaways, estate agents, betting shops and off licences

Alternatives considered

1. Resist the development of any additional Hot Food Takeaway, Estate Agent, Betting Shop or Off Licence and seek to reduce numbers which already exist within the centre.

2. Allow (10%) of such to be able to be located or part of the secondary shopping frontage.

Summary of appraisal findings

11.7.1 Hot food takeaways and betting shops etc. are over concentrated in the town centre. Resisting additional development and seeking to reduce the existing offer (1) would free up retail space for other businesses providing the opportunity to enhance and not undermine the vitality and viability of the centre.

11.7.2 Breaking up the clustering of existing hot food takeaways and betting shops (2) would aesthetically improve the visual appearance of the high street. However, relocating these businesses to another part of the high street does not reduce their overconcentration within the town centre as a whole nor provide the opportunity for other businesses to enter the high street in their place.

11.7.3 Appendix VII presents appraisal findings in full.
The Council’s preferred approach

11.7.4 The Council has chosen not to address this issue through a specific policy within the AAP. Rather, the Council will seek to apply policy CS13 – Promoting Health and Well-Being and DM24 – Health and Well Being, which seeks to, “reduce the proliferation of any land use which reduces people’s ability to be healthy”.

11.8 Pubs

Alternatives considered

1. Resist the loss of any existing pubs within the centre and seek to promote healthy pubs.
2. Not protect or promote healthy pubs within the centre.

Summary of appraisal findings

11.8.1 Resisting the loss of existing pubs (1) would help preserve the areas historic environment and help maintain stable employment in this sector. The promotion of healthy pubs would enhance the evening economy and provide opportunities for new establishments helping maintain the vitality of the town centre and draw in new investment. New pubs would also provide a variety of new employment opportunities.

11.8.2 (2) is appraised on the assumption that the aim would be to resist the loss of existing pubs but not actively protect or promote healthy pubs. Given the picture nationally that pubs are closing at an increasing rate, there may be little the Council can do to resist further loss of existing pubs without active intervention. It is possible that existing pubs would close and be converted to other use. This could impact on the local historic environment of the town centre and undermine the vitality and viability of the town centre, in particular impacting the evening economy. The extent to which employment opportunities would be impacted is unclear and would depend on the nature of any change of use of the premises.

11.8.3 At the interim appraisal stage, the following recommendations were made:

- A definition of ‘healthy pub’ should be provided in the Glossary to ensure a consistent understanding of the use of this term.

11.8.4 Appendix VIII presents appraisal findings in full.

The Council’s preferred approach

11.8.5 The Council has chosen not to address this issue through a specific policy within the AAP. Rather, the Council will apply policy CS3 – Social Infrastructure, which seeks to, promote the enhancement of existing social infrastructure…and resisting its unsubstituted loss.”

11.9 Leisure, entertainment, culture and tourism

Alternatives considered

1. Developing opportunity sites for new leisure, entertainment, cultural and leisure uses; support the development of a ‘Leisure Zone and Entertainment’ (eastern end of the High Street); support the creation of a ‘Cultural Café Quarter’ (western end of the High Street); and facilitate and support the growth of the evening economy, with particular focus in the ‘Leisure and Entertainment Zone’ and ‘Cultural Café Quarter’.
2. Not to develop any leisure or cultural uses within the centre.
3. Not to seek to develop the evening economy within the centre.
Summary of appraisal findings and recommendations

11.9.1 The development of opportunity sites and identified areas for leisure and entertainment with the focus on supporting the growth of the evening economy (1) would likely result in:

- increased footfall and hence reduced crime and fear of crime;
- improved entertainment, leisure and cultural uses in the town centre, which would contribute to well-being objectives; and
- an improved ‘image’ for the town centre, which in turn could increase the attractiveness of the town centre as a recreation and tourism destination and also increase the ‘confidence’ of potential inward investor (which in turn could enhance employment opportunities in the Borough).

11.9.2 The town centre lacks non-retail uses such as leisure, tourism and cultural facilities despite its proximity to a large local population and good transport links. (2) would not improve this situation and hence would fail to address local need. This approach would result in a missed opportunity to be gained from the influx of tourists as part of the Olympics legacy experience. The existing poor evening economy contributes to a deserted high street in the evening where people can feel unsafe and a lack of investment in creating an evening economy would not help address this issue. The lack of a strong policy promoting development would fail to attract inward investment and provide the means to enhance the vitality and viability of the town centre. Consequently, businesses could choose to locate to other centres such as Stratford, Ilford and Enfield.

11.9.3 The town centre has a limited evening economy which contributes to a centre that feels ‘dead’ and unsafe in the evening. Failing to address this (3) would not reduce crime and the fear of crime. Furthermore, it would result in a missed opportunity to diversify the local economy and provide incentives for new investment with consequential impacts on local employment.

11.9.4 Appendix IX presents appraisal findings in full.

The Council’s preferred approach

11.9.5 The Council’s preferred approach is to develop a strong leisure and entertainment and support the evening economy within Walthamstow Town Centre through: identifying and designating opportunity sites; supporting the development of a ‘Leisure and Entertainment Hub’ at the eastern end of the high street; and supporting the creation of ‘St James Street Quarter’ at the Western end of the High Street.

11.9.6 This approach is similar to that outlined in (1), for which a number of positive effects were predicted by the Interim SA. The changes made to WTC4 reflect the need to develop and pan – London visitor attraction/destination and the need to further development a ‘more than locally significant night –time economy cluster’ within Walthamstow Town Centre.

11.10 Employment

Alternatives considered

1. Protect existing employment uses within the centre; further diversify range of employment generating uses within the centre; develop opportunity sites for new office space; encourage the development of creative and cultural industries; and support the development of a Business Improvements District.

2. Seek to significantly change the role and function of the centre and make it a location for office and business use. Seek to provide a significant increase in the amount of high quality and adaptable office and business floorspace within the centre.
Summary of appraisal findings

11.10.1 Walthamstow centre has been underperforming for a number of years and if this trend continues the centre will increasingly lose out to other centres which are diversifying and expanding. (1) would help halt this decline. Development of the distinct leisure zone and café quarter would appeal to a wider audience and draw in additional visitors. The opportunity sites would help support this offering and also provide additional office and work space to support the business sector. (1) represents a balanced and flexible framework approach to delivering a diverse and attractive town centre and would contribute the successful regeneration of the centre.

11.10.2 Increasing office and business uses (2) would help diversify and provide greater balance to the local economy. (2) would likely attract inward investment; however it would also ultimately lead to an over concentration of such uses and a lack of diversification for the local economy. It is not clear whether a change of role and function to office and business use would result in a mismatch between local people's skills and business need. Furthermore, reducing the availability of business premises to support an evening economy could lead to increased crime and fear of crime.

11.10.3 At the interim appraisal stage, the following recommendation was made:

- Seek to provide a combination of the (1) and (2). While protecting existing employment uses there could also be opportunity to designate specific areas in the AAP to accommodate new office and business uses, including high quality and adaptable office and business floorspace.

11.10.4 Appendix X presents appraisal findings in full.

The Council’s preferred approach

11.10.5 The Council’s preferred approach is to develop a strong, balanced and diverse local economic centre, which: protects the existing uses and promotes new employment floorspace; develops opportunity sites; diversifies the range of employment generation uses within the centre; and supports the development of a Business Improvement District.

11.10.6 This approach is similar to that outlined in (1), for which a number of positive effects were predicted by the Interim SA. The changes made to WTC5 reflect the need to further diversity the local economy and encourage alternative uses within the centre. There is a focus on the development of the office sector and the aim to provide affordable workspace/floorspace for start up businesses and those from emerging sectors. Such an approach aims to create additional job opportunities for local people and also increase local spend through additional office/industry workers coming to the centre.

11.11 Transport improvements

Alternatives considered

1. Work with TFL and other transport providers to ensure there is sufficient capacity on existing bus and rail transport systems; simplify the layout of the gyratory system on Hoe Street; improve pedestrian crossings at a) High Street/Hoe Street, b) Hoe Street/ Selborne Road c) Walthamstow Central exit/Seborne Road/Bus Station and d) Palmerston Road/High Street; establish a pedestrian and cycle link between key transport interchanges at Walthamstow Queens Road and Walthamstow Central; create a new walkway(s) under the Liverpool Street to Chingford line; improve north/south links; improve the lighting in and around the centre; and requiring new development to provide financial contributions towards projects that enhance the transport network in the centre.

2. Take a 'do nothing' approach.
Summary of appraisal findings

11.11.1 In the medium to long term, (1) would likely achieve significant positive effects in terms of sustainability objectives that relate to increasing ‘accessibility’ to employment / services etc. There could also be benefits in terms of reducing greenhouse gas emissions, improving air quality (through a reduction in traffic-based emissions) and maintaining / enhancing the vitality and viability of the town centre.

11.11.2 The appraisal has shown that a ‘do nothing’ approach (2) would result in a continuation of existing problems in terms of poor accessibility to employment / services etc for those that live and work in the Borough, car dependency (and associated air pollution) and vitality / viability of the town centre.

11.11.3 At the interim appraisal stage, the following recommendation was made:

11.11.4 Provide further details on measures being take to increase pedestrian and cycle access beyond just the town centre to ensure links are made with other networks.

11.11.5 Appendix XI presents appraisal findings in full.

The Council’s preferred approach

11.11.6 The Council’s preferred approach is to improve the quality and frequency of public transport within the Centre by: working with TFL and other transport providers to ensure there is sufficient transport capacity on the existing bus and rail transport system; simplifying the layout of the gyratory system; and improving pedestrian and cycle links.

11.11.7 This approach is similar to that outlined in alternative (1), for which a number of positive effects were predicted by the Interim SA. The changes made to WTC6 reflect the need to accommodate growth whilst minimising impacts on the road network and encourage a model shift away from the private car. Creating new and improving existing links/junctions we will improve connectivity within the centre, reduce severance and make routes/junctions attractive, safe and secure to pedestrians and cyclists. Upgrade in the pedestrian and cycle environment will further encourage this modal shift. Improvements to the road network will improve traffic flow and general road efficiency.

11.12 Sustainable transport

Alternatives considered

1. Support a range of improvements to promote and enhance the environment for pedestrians and cyclists; and improve the cycle network in the centre.

2. Prioritise initiatives which upgrade and improve the existing road network and promote the use of the private car as the main form of transport to access the centre.

Summary of appraisal findings

11.12.1 Supporting other forms of sustainable transport to make the centre more attractive and safe for pedestrians and cyclists and improve networks (1) would have benefits for health, access, integrating sustainable transport and reducing greenhouse gas emissions.

11.12.2 Evidence reveals that the centre can become heavily congested with traffic at particular times, causing significant delays. Prioritising initiatives which upgrade and improve the existing road network and promoting the use of the private car as the main form of transport to access the centre (2) would therefore result in negative effects in terms of sustainability objectives.

11.12.3 Appendix XII presents appraisal findings in full.
The Council’s preferred approach

11.12.4 The Council’s preferred approach is to develop and promote sustainable forms of transport within the centre through: enhancing the environment for pedestrians and cyclists; requiring new development to provide electric car charging points; and requiring new developments to provide transport assessments and travel plans.

11.12.5 This approach is similar to that outlined in (1), for which a number of positive effects were predicted by the Interim SA. The changes made to WTC7 reflect the need to encourage a model shift away from the private car. Creating new and improving existing links/junctions we will improve connectivity within the centre, reduce severance and make routes/junctions attractive, safe and secure to pedestrians and cyclists.

11.13 Car and cycle parking

Alternatives considered

1. Ensure that all new residential development within the centre is ‘car free’ incorporating the appropriate level of cycle parking; and ensure that all new retail, leisure, community and cultural uses provide appropriate levels of car and cycle parking.

2. Provide additional car parking within the town centre for car borne visitors to the centre.

3. Allow an element of car parking in residential development.

Summary of appraisal findings

11.13.1 Ensuring that all new residential development within the centre is ‘car free’ and incorporates an appropriate level of cycle parking, together with an approach that ensures all new retail, leisure, community and cultural uses provide appropriate levels of car and cycle parking (1), would have benefits in terms of a sustainability objectives relating to: health, access to employment and services; access to an integrated sustainable transport system; reducing greenhouse gas emissions; improving air quality through a reduction in traffic-based emissions; and enhancing the town centre.

11.13.2 Evidence suggests that it is considered unnecessary to provide additional car parking given that various car parks within the centre are under utilised and are only close to capacity at peak time during the weekend. (2) would have negative effects in terms of: enabling access to an integrated sustainable transport system; reducing greenhouse gas emissions; and addressing air quality problems.

11.13.3 The sustainability impacts of (3) would depend on the specifics of how much car parking is allowed or accommodated in residential development (e.g. only for disabled residents), where the residential development is located, whether any quotas are applied (e.g. one car per household), and the extent of ‘car free’ development.

11.13.4 Appendix XIII presents appraisal findings in full.

The Council’s preferred approach

11.13.5 The Council’s preferred approach is to provide appropriate levels of car and cycle parking within the centre through ensuring all new development within the centre is ‘car free and new development incorporates car club spaces where viable.

11.13.6 This approach is similar to that outlined in (1), for which a number of positive effects were predicted by the Interim SA. The changes made to WTC8 reflect the need to balance the parking needs of retailers, business and market traders within the centre who rely on sufficient provision of parking for their customers and servicing and the need to minimise growth in private in order to reduce traffic congestion and improve air quality.
11.14 High quality environment

Alternatives considered

1. Improve the town centre's image and public realm; the market and pedestrian circulation; apply ‘High Street Life Strategy’ principles to new shop fronts on Hoe, High and St James Streets; designate Hoe Street as an 'Area of Public Realm Improvement'; improving the pedestrian environment and by including Walthamstow as part of the ‘Legible London’ way finding scheme; protecting and enhancing the heritage of the centre; removing unnecessary obstacles, barriers and street clutter within the public realm; enhancing and improving the quality of green spaces throughout the centre; providing play facilities in the centre (particularly in areas of deficiency); incorporating improvements to the public realm to make the centre more active and secure; and requiring new development to provide financial contributions towards projects that enhance the existing public realm.

2. Take a 'do nothing' approach.

Summary of appraisal findings

11.14.1 (1) would result in significant improvements to the town centre's image and public realm. At the same time, (1) would also ensure that change occurs in such a way that ensures existing local character is respected. The approach would likely have benefits in terms of reducing crime; improving health and wellbeing; enabling access to community facilities and open spaces; enhancing the historic environment, ensuring the vitality and viability of the town centre; and attracting inward investment.

11.14.2 The appraisal has shown that a 'do nothing' approach (2) would lead to a continuation of negative trends in terms of a number of sustainability objectives. This approach would not be conducive to the enhancement and regeneration of the centre.

11.14.3 Appendix XIV presents appraisal findings in full.

The Council’s preferred approach

11.14.4 The Council's preferred approach is to provide improve the town centre's image and public realm through: supporting the reorganisation of the market to improve the appearance and function of the market and pedestrian circulation; improve the pedestrian environment; improve lighting in and around the centre; improve the quality of the public realm; conserve and enhance the centre's historic environment; enhance and improve the quality of green space; and provide play facilities within the centre.

11.14.5 This approach is similar to that outlined in (1), for which a number of positive effects were predicted by the Interim SA. The changes made to WTC10 reflect the need to enhance the centre's image and visual quality, strengthen its local identity, improve its public spaces, general environment and accessibility and safety.

11.15 Design and place making

Alternatives considered

1. Use the following “place-making” principles as a framework when considering new development and improvements within the centre - creating, improving and reinforcing convenient and safe pedestrian and cycle routes to the town centre; improving the key “arrival” points into the centre via environmental improvements; significantly raising the quality of architectural and urban design in the area; setting a framework for building heights of new development to be sympathetic in scale to the predominant 2-3 storey context, whilst focussing taller buildings in key “gateway” sites; encouraging restoration and ongoing improvement of existing buildings of character within the centre; a range of options for improving the town square and gardens; a new public space strategy;
incorporating “active building frontages” in all new development; a management regime for the area to reinforce the town centre offer for shoppers and visitors.

2. Create a new character and context for the centre by creating landmark buildings, encouraging distinctive and contemporary design and establishing new building forms and character areas.

Summary of appraisal findings

11.15.1 (1) would involve following “place-making” principles as a framework when considering new development and improvements within the centre. The approach would have benefits in terms of health and wellbeing; access to community facilities and open spaces; enhancement of the historic environment; maintenance of vitality and viability within the town centre; and attracting inward investment.

11.15.2 Creating a ‘new character’ for Walthamstow (2) could make it possible to better capitalise on an overall design and place making strategy particularly for Walthamstow. ‘Creating a new character’ could also help to address some existing local problems. For example, the town gardens are underused and don’t function well. Improving the town gardens holistically as part of a ‘new character’ with other open space and/or public realm areas could be more effective. However, a ‘new character’ and context would also need to seek to ensure that any change occurs in such a way that respects existing local character and context to be preserved.

11.15.3 At the interim appraisal stage, the following recommendation was made:

- Develop a preferred policy approach that reflects aspects of both alternatives (1) and (2). Such an approach would involve improving and protecting local character and context as well as looking to create in appropriate areas a ‘new character’ to better capitalise on the place making strategy.

11.15.4 Appendix XV presents appraisal findings in full.

The Council’s preferred approach

11.15.5 The Council’s preferred approach is to improve and use a series of “place-making” principles as a framework when considering new development and improvements.

11.15.6 This approach is similar to that outlined in (1), for which a number of positive effects were predicted by the Interim SA. The changes made to WTC9 reflect the need/opportunity for new development to contribute to the enhancement and transformation of the town centres built environment through innovative design intervention and also the need to give recognition and enhance the town centre’s unique characteristics, local context and heritage.

11.16 Social infrastructure

Alternatives considered

1. Provision of amenities on mixed use sites with a high density of residential use and grant planning permission for community uses and social infrastructure; as part of mixed-use development on the Opportunity Sites; in other accessible locations, where an active ground floor street frontage is provided; contributions will be sought through planning obligations to support the provision of new social infrastructure or the expansion or improvement of existing facilities to meet the needs of the community; and wherever possible, new facilities should be a multi-use and be accessible by all members of the community.

2. Prioritise the delivery of the most important forms of social infrastructure health and education.
Summary of appraisal findings

11.16.1 (1) looks to ensure that housing growth is supported by the appropriate social infrastructure. The approach would have benefits in terms of: health; access to community facilities; access to education and training; and making the best use of PDL (through encouraging provision of amenities on mixed use sites with a high density of residential use).

11.16.2 While (1) looks to provide social infrastructure to support housing growth, (2) seeks to prioritise health and education infrastructure. Even though (2) also performs well against sustainability objectives, the options in this instance are not able to be directly compared due to their difference in emphasis.

11.16.3 At the interim appraisal stage, the following recommendation was made:

- The preferred policy approach should provide further detail on the priority order for social infrastructure.

11.16.4 Appendix XVI presents appraisal findings in full.

The Council’s preferred approach

11.16.5 The Council’s preferred approach is to ensure that existing and future local residents have appropriate levels of social infrastructure by: resisting the loss of existing social infrastructure in the centre; developing opportunity sites; and seeking contributions through planning obligations.

11.16.6 This approach is similar to that outlined in (1), for which a number of positive effects were predicted by the Interim SA. The changes made to WTC13 reflect the fact that providing for community uses and social infrastructure, is critical to building a strong, sustainable community in the centre, provides local residents with uses and services which benefit their lives and adds to the centre’s vitality and viability.

11.17 Decentralised energy

Alternatives considered

1. To facilitate a CHP and district heating system to supply the centre with energy by: requiring developments in the area to contribute towards establishing the system; connecting public sector buildings and redeveloped Council properties to the network in order to provide sufficient anchor loads; requiring all new development to link to the system, subject to viability; requiring all development which comes forward before the system is established to be ‘connection ready’; and safeguarding routes for pipelines.

2. Take a ‘do nothing’ approach.

Summary of appraisal findings

11.17.1 (1) would have benefits in the short to medium term and significant positive effects in the long term in terms of reducing greenhouse gas emissions. The policy aims to facilitate a CHP and district heating system to supply the centre with energy, requiring contributions from developers, subject to viability.

11.17.2 Not to facilitate and promote CHP and district heating system in the centre (2) would lead to significant negative and negative effects in terms of the sustainability objective to reduce greenhouse gas emissions. Furthermore, this approach would not be conducive to meeting the significant heat demand that exists at a number of sites/buildings within the centre. It is acknowledged, however, that the cost of implementing a district heating system is high and that seeking contributions from developers could have implications in terms of development viability.

11.17.3 At the interim appraisal stage, the following recommendation was made:
There may be a need to investigate the viability of other technology if it were found that the cost of implementation of the district heating system is so high that it would affect development viability.

11.17.4 Appendix XVII presents appraisal findings in full.

The Council’s preferred approach

11.17.5 The Council’s preferred approach is to ensure that proposals in Walthamstow Town Centre minimise carbon emissions by requiring all developments of one or more homes, or homes greater than 100 s.q.m to be accompanied by an energy assessment.

11.17.6 This approach is similar to that outlined in (1), for which a number of positive effects were predicted by the Interim SA. The changes made to WTC 12 reflect the aspiration to establish a Decentralised Energy Network for the Upper Lee Valley (unless this can be demonstrated to be unfeasible or unviable) and to ensure that developments coming forward in advance of any network should be designed to be ‘connection ready’.

11.18 Access to sites of nature conservation

Alternatives considered

1. Improve access to sites of nature conservation importance by: creating, improving and enhancing links to sites of nature conservation importance; and seeking developer contributions to create, improve and enhance links to sites of nature conservation importance.

2. Not to link the town centre with areas of nature conservation importance which are located nearby.

Summary of appraisal findings

11.18.1 (1) looks to improve access to sites of nature conservation importance as the centre is deficient in access to nature conservation and biodiversity. The approach would have benefits for health, access to recreational needs, conserving and enhancing biodiversity, and maintaining and enhancing the quality of open space areas.

11.18.2 To not provide a link the town centre with areas of nature conservation importance which are located nearby (2) would not address the deficiency that exists in terms of access to nature or be conducive with the achievement of other, wide-ranging sustainability objectives.

11.18.3 At the interim appraisal stage, the following recommendation was made:

• In promoting access to areas of nature conservation importance, the preferred policy approach should clearly specify that any increase in access should not lead to detrimental effects in terms of biodiversity.

11.18.4 Appendix XVIII presents appraisal findings in full.

The Council’s preferred approach

11.18.5 The Council’s preferred approach is to improve access to sites of nature conservation importance by creating, improving and enhancing physical links and seeking developer contributions to assist in achieving this.

11.18.6 This approach is similar to that outlined in (1), for which a number of positive effects were predicted by the Interim SA. The changes made to WTC 14 reflect increase opportunities for residents’ access nature and to partake in leisure and recreation actives which will improve their health and fitness.
12 OPPORTUNITY SITES

12.1.1 The Proposed Submission Plan identifies aspirations for 18 ‘Opportunity Sites’ within the AAP area. Essentially, the Opportunity Sites identified in the Proposed Submission AAP reflect those that are likely to be deliverable over the plan period, do not conflict with strategic policies (for example, the need to protect designated employment land and conservation areas) and can bring significant regeneration benefits to the area. Some alternative sites were considered but have not been taken forward. Reasons for discounting such sites is provided in the Proposed Submission AAP. For example, ‘Courtney Place’ was removed as an Opportunity Site subsequent to consultation on the AAP ‘Preferred Options’ document on the basis that the site is currently used as a bus stop and bus waiting and turning area and it is now understood that there are no other locations within the town centre were these bus operations could be relocated.

12.1.2 For each site, prior to preparing the draft plan, there was the need for the Council to determine an appropriate ‘aspiration’ and, more specifically, develop policy with a view to helping to ensure that the aspiration is realised. Given the importance of these decisions, it was determined that there was a need to give consideration to alternative approaches as an interim plan-making / SA step.

12.1.3 For each Opportunity Site, this Chapter summarises the interim SA findings that were fed-back to the Council; and also explains the degree to which these findings are reflected in the Council's preferred approach as set out within the Proposed Submission AAP document.

12.2 Snooker Hall

Alternatives considered
1) Housing led mixed use scheme including social infrastructure
2) Retain use for leisure
3) Housing led mixed uses scheme including retail

Summary of appraisal findings

12.2.1 Option 1 offers new housing supporting AAP targets whilst intensifying the currently under utilised land and providing new social infrastructure and facilities to support it. Leisure development on the site in option 2 would increase the wellbeing of local people but as it falls on the periphery of the AAP boundary it potentially draws footfall/activity away from the centre. Option 3 gives rise to similar concerns.

12.2.2 Appendix IXX presents appraisal findings in full.

The Council’s preferred approach

12.2.3 The Council's preferred approach is Option 1. The current leisure use is under utilises the site and therefore there is the opportunity to further intensify uses on this site. Social Infrastructure would provide additional floorspace for such uses. As a ‘gateway’ site and prominent location a landmark building would be justified. The provision of social infrastructure would further contribute the diversification of uses within the AAP area. Social Infrastructure use on the ground floor will encourage active frontage at street level. Residential use on the upper floors will increase the number of new homes within the AAP area. Residential use will also compliment the surrounding residential uses to the site.
12.2.4 Re. **Option 2** - The Council would seek leisure uses to be concentrated within the town centre boundary (particularly in the ‘leisure and entertainment hub’ and ‘St James Street Quarter’ which this site is located outside of), where they are most accessible and to add to the vitality and viability of the centre and development of the evening economy. This option use was discounted as this site is in the periphery of the AAP boundary there is a concern that a leisure use could draw footfall/activity and spend away from the town centre. The quality of the existing leisure offer is poor and does not contribute the regeneration of the town centre. In addition, the current leisure use is under utilises and therefore retaining the leisure use would miss an opportunity to develop optimise/intensify the use of the site. This option would not contribute towards the level of housing within the town centre.

12.2.5 Re. **Option 3** - The retail element of this option was discounted as this site is in the periphery of the AAP boundary (i.e. outside the town centre boundary) there is a concern that a retail use could draw footfall/activity and spend away from the town centre.

12.3 **Tower Hamlets Road**

**Alternatives considered**

1) Housing led mixed use scheme including commercial use  
2) Retain as commercial use  
3) Housing

**Summary of appraisal findings**

12.3.1 Options 1 and 3 would contribute to the achievement of residential targets. Option 1 would also include commercial uses that would result in employment and inward investment opportunities. Retaining the currently vacant commercial use (Option 2) could see the site continuing to be vacant and underused.

12.3.2 **Appendix XX** presents appraisal findings in full.

**The Council’s preferred approach**

12.3.3 The **Council’s preferred approach is Option 1**. The site is part vacant and underused and therefore there is the opportunity to further intensify uses on this site. The conversion of part of the building to residential use will contribute to the provision of new homes within the AAP area. Residential use will also compliment the surrounding residential uses to the site. The site is an existing commercial use and as such retaining an element of commercial uses is considered appropriate. Redevelopment provides the opportunity to provide modern or refurbished commercial space which will attract new business opportunities (investment and job creation) into the AAP area. The provision of commercial space will further diversify the local economy and support local business.

12.3.4 Re. **Option 2** - The current commercial use is underutilised and therefore retaining the commercial use in its current form would miss an opportunity to develop optimise/intensify the use of the site. The site is partially vacant existing commercial use contributes little to the regeneration of the AAP area. A pure commercial uses would not contribute towards housing within the town centre.

12.3.5 Re. **Option 3** - This option would provide the opportunity to further intensify uses on this site and contribute to the provision of new homes within the AAP area. However, such an option would result in the loss of the all the commercial space. There are few opportunities in the AAP boundary for such a use and would miss out on the opportunity to provide modern or refurbished commercial space and potential attract new business opportunities (investment and job creation) into the AAP area.
12.4 Petrol Station Hoe Street

Alternatives considered
1) Housing led mixed use scheme including social infrastructure
2) Housing
3) Housing led mixed use scheme including retail

Summary of appraisal findings

12.4.1 All options provide housing and would therefore contribute to meeting housing targets. Option 1 would also enable improved access to facilities for local people. Option 3 could detract from the centre.

12.4.2 Appendix XXI presents appraisal findings in full.

The Council’s preferred approach

12.4.3 The Council’s preferred approach is Option 1. The current site is under utilises the site and therefore there is the opportunity to further intensify uses on this site. Residential use on the upper floors will increase the number of new homes within the AAP area. Residential use will also compliment the surrounding residential uses to the site. Social Infrastructure would provide additional floorspace for such uses. The provision of social infrastructure would further contribute the diversification of uses within the AAP area. Social Infrastructure use on the ground floor will encourage active frontage at street level.

12.4.4 Re. Option 2 - This option would provide the opportunity to further intensify uses on this site and contribute to the provision of new homes within the AAP area. This option would miss the opportunity to provide social infrastructure and to further diversify the range of uses within the AAP area.

12.4.5 Re. Option 3 - The retail element of this option was discounted as this site is in the periphery of the AAP boundary (i.e. outside the town centre boundary) there is a concern that a retail use could draw footfall/activity and spend away from the town centre.

12.5 Tax Office

Alternatives considered
1) Commercial (office) led mixed use scheme with residential
2) Retail led mixed use scheme including housing
3) Housing

Summary of appraisal findings

12.5.1 Option 1 would attract investment and jobs as well as contribute to housing targets. Option 2 changes the use to retail which could detract from town centre activity whilst Option 3 concentrates on housing but at the expense of employment.

12.5.2 Appendix XXII presents appraisal findings in full.
The Council's preferred approach

12.5.3 The Council’s preferred approach is Option 1. The site is an existing commercial use (office) and retaining an element of commercial uses is considered appropriate. Given the sites excellent transport accessibility, it is considered that further intensification of the site is acceptable. Redevelopment provides the opportunity to provide modern or refurbished commercial space which will attract new business opportunities (investment and job creation) into the AAP area. The provision of commercial space will further diversify the local economy and support local business. The conversion/addition of part of the building to residential use will contribute to the provision of new homes within the AAP area. Maintaining an office use on the ground floor will encourage active frontages at street level. As a ‘gateway’ site and prominent location a landmark building would be justified.

12.5.4 Re. Option 2 - This option would provide the opportunity to further intensify uses on this site and contribute to the provision of new homes within the AAP area and provide additional retail floorspace. However, such an option would result in the loss of the all the commercial space. There are few opportunities in the AAP boundary for such a use (office) and would miss out on the opportunity to provide modern or refurbished commercial space and potential attract new business opportunities (investment and job creation) into the AAP area. There is considered to be sufficient alternative sufficient sites within the town centre boundary to provide the proposed level of retail floorspace over the plan period.

12.5.5 Re. Option 3 - This option would provide the opportunity to further intensify uses on this site and contribute to the provision of new homes within the AAP area. However, such an option would result in the loss of the all the commercial space.

12.6 EMD Cinema

Alternatives considered
1) Leisure led mixed use scheme
2) Social infrastructure (place of worship) led mixed uses scheme
3) Housing led mixed uses scheme

Summary of appraisal findings

12.6.1 Option 1 provides a strong redevelopment and focus for the ‘Leisure and Entertainment Hub’, which in turn will help to enhance the vitality and viability of the town centre and also lead to increased provision of community facilities and access to employment opportunities. Option 2 will also provide enhanced community facilities, as well as retaining the listed building (as with Option 1). Option 3 provides housing but would result in loss of the listed building.

12.6.2 Appendix XXIII presents appraisal findings in full.
The Council’s preferred approach

12.6.3 **The Council’s preferred approach is Option 1.** The current use under utilises the site and therefore there is the opportunity to intensify use. The development of this site will restore a decaying listed building to its rightful former glory. Given the site’s use and location within the ‘Leisure and Entertainment Hub’, this site offers a unique opportunity to provide new leisure use(s) within the town centre which will attract additional visitors and tourism to the centre. The site provides a rare opportunity to contribute to the creation of a leisure and entertainment visitor attraction/destination with a wide appeal. This will encourage a greater number of visitors and increases spend within the centre. The proposed use(s) should promote and support the development and implementation of the ‘Leisure and Entertainment Hub’. Linked with and complementing the proposed uses on the on the Arcade and HSBC sites, there is a genuine opportunity to contribute to the regeneration of the town centre. In addition to the above, proposed uses should seek to promote and contribute to developing a ‘more than locally significant night-time economy cluster’. The site offers a opportunity to link and complement with the proposed uses on the Arcade and HSBC sites in order to develop a genuine night-time cluster with a pan-London appeal. Active frontages should be incorporated on Hoe Street. The proposed uses will activate the frontage throughout the day and evening. The site is close to key transport hubs and thus is an ideally located for people accessing the site by public transport. It would further diversity the range of uses within the centre.

12.6.4 **Re. Option 2** - This proposal does not promote and support the development and implementation of the ‘Leisure and Entertainment Hub’. Such a proposal would have fewer regeneration benefits particularly in terms of attracting visitors and increasing spend in the centre. It would have limited appeal to the local community.

12.6.5 **Re. Option 3** - This option would contribute to the provision of new homes within the AAP area. The current site is under utilises the site and therefore there is the opportunity to further intensify uses on this site. However, the conversion of the Listed building for housing use would be difficult. This option would miss the unique opportunity to rare opportunity to contribute to the creation of a leisure and entertainment visitor attraction/destination with plan - London appeal. This proposal does not promote and support the development and implementation of the ‘Leisure and Entertainment Hub’. Such a proposal would have fewer regeneration benefits particularly in terms of attracting visitors and increasing spend in the centre.

12.7 **HSBC Site**

**Alternatives considered**
1) Leisure/cultural/restaurant led mixed use scheme with residential
2) Retail led mixed uses scheme
3) Housing led mixed uses scheme

**Summary of appraisal findings**

12.7.1 Under Option 1, leisure and restaurant led mixed use would lead to increased social facilities and jobs in the area. Option 2 would also provide jobs however doesn’t sit with the ‘Leisure and Entertainment Hub’ designation. The same can be said for Option 3. Under this option housing would be provided but at the expense of economic activity and footfall.

12.7.2 **Appendix XXIV** presents appraisal findings in full.
The Council’s preferred approach

12.7.3 **The Council’s preferred approach is Option 1.** A leisure proposal will provide a much needed leisure and entertainment attractions/facilities in the centre and housing. It would further diversity the range of uses within the centre. Given the sites use and location within the ‘Leisure and Entertainment Hub’, this site offers an opportunity to provide new leisure use(s) within the town centre which will attract additional visitors and tourism to the centre. The site provides an opportunity to contribute to the creation of a leisure and entertainment visitor attraction/destination with wide appeal. This will encourage a greater number of visitors and increases spend within the centre. The proposed use(s) should promote and support the development and implementation of the ‘Leisure and Entertainment Hub’. Linked with and complementing the proposed uses on the on the Arcade and EMD sites, there is a genuine opportunity to contribute to the regeneration of the town centre. In addition to the above, proposed uses should seek to promote and contribute to developing a ‘more than locally significant night-time economy cluster’. The site offers a opportunity to link and complement with the proposed uses on the Arcade and EMD sites in order to develop a genuine night-time cluster with a pan-London appeal. The proposed uses activate the frontage throughout the day and evening. The site is close to key transport hubs and thus is an ideally located for people accessing the site by public transport. This proposal would contribute to the provision of new homes within the AAP area.

12.7.4 Re. **Option 2** - This option would provide additional retail floorspace. It would further diversity the range of uses within the centre. The proposed uses activate the frontage throughout the day and evening. However, this would miss the opportunity to contribute to the creation of a leisure and entertainment visitor attraction/destination with wide appeal. Such a proposal would have fewer regeneration benefits particularly in terms of attracting visitors and increasing spend in the centre.

12.7.5 Re. **Option 3** - This option would provide the opportunity to further intensify uses on this site and contribute to the provision of new homes within the AAP area. However, this would miss the unique opportunity to contribute to the creation of a leisure and entertainment visitor attraction/destination with wide appeal. Such a proposal would have fewer regeneration benefits particularly in terms of attracting visitors and increasing spend in the centre.

12.8 **Arcade Site**

**Alternatives considered**
1) Housing led mixed use development including leisure, retail and restaurant uses
2) Housing
3) Housing led mixed use scheme including retail

**Summary of appraisal findings**

12.8.1 All option will result in the loss of open space. However, Option 1 would replace this with important community amenities. All options provide housing; however, this is the only focus for Option 2 which would mean no advancement of employment or investment opportunities. Option 3 addresses this with retail; however, retail may not be a sustainable approach to encouraging investment given that this site falls inside the ‘Leisure and Entertainment Hub’.

12.8.2 **Appendix XXV** presents appraisal findings in full.
The Council’s preferred approach

12.8.3 The Council’s preferred approach is Option 1. The current use under utilises the site and therefore there is the opportunity to further intensify uses. Residential use on the upper floors will increase the number of new homes within the AAP area. This proposal will provide a mix of uses diversifying the range of uses within the centre. Given the sites use and location within the ‘Leisure and Entertainment Hub’, this site offers a unique opportunity to provide new leisure use(s) within the town centre which will attract additional visitors and tourism to the centre. The site provides a rare opportunity to contribute to the creation of a leisure and entertainment visitor attraction/destination with wide appeal. This will encourage a greater number of visitors and increases spend within the centre. The proposed use(s) should promote and support the development and implementation of the ‘Leisure and Entertainment Hub’. Linked with and complementing the proposed uses on the on the Arcade and HSBC sites, there is a genuine opportunity to contribute the regeneration of the town centre. In addition to the above, proposed uses will to promote and contribute to developing a ‘more than locally significant’ night-time economy cluster. The site offers a rare opportunity to link and complement with the proposed uses on the Arcade and HSBC sites in order to develop a genuine night-time cluster with a pan-London appeal. The proposed uses should seek to activate the frontage throughout the day and evening. The ancillary retail and restaurants etc will further support this. The site is close to key transport hubs and thus is an ideally located for people accessing the site by public transport. It would further diversity the range of uses within the centre.

12.8.4 Re. Option 2 - While such an option would provide the opportunity to further intensify uses on this site and contribute to the provision of new homes within the AAP area. However, this would miss the unique opportunity to contribute to the creation of a leisure and entertainment visitor attraction/destination with wide appeal. Such a proposal would have fewer regeneration benefits particularly in terms of attracting visitors and increasing spend in the centre.

12.8.5 Re. Option 3 - While such an option would provide the opportunity to further intensify uses on this site and contribute to the provision of new homes within the AAP area. However, this would miss the unique opportunity to contribute to the creation of a leisure and entertainment visitor attraction/destination with wide appeal. Such a proposal would have fewer regeneration benefits particularly in terms of attracting visitors and increasing spend in the centre.

12.9 Town Square and Gardens

Alternatives considered
1) Accommodation an extension to Selborne Walk shopping centre and improvement and enhancement of the remaining open space
2) Retain green space

Summary of appraisal findings

12.9.1 Option 1 would involve extensive expansion and regeneration of the open space maintaining and enhancing the vitality of the town centre. The retention of the green space in option 2 is positive in terms of some sustainability objectives; however, the site as it is currently is not conducive to good pedestrian flows.

12.9.2 Appendix XXVI presents appraisal findings in full.
12.9.3 **The Council’s preferred approach is Option 1.** The Gardens suffer from poor interfaces on all sides particularly with the bus station. The pedestrian environment is not as high quality as you would expect from a gateway into the town centre and crossings, especially around the gyratory and Selborne Road. The Gardens lack a coherent character and definition. The area of the Gardens proposed for potential extension is the area of the gardens least well used and also suffers from poor interface between Selborne Walk shopping centre and Selborne Road. In accommodating the extension the Council will seek enhancements to the remaining space. In order to improve the quality of the existing space we proposed that any proposals which extend onto the Town Square and Gardens and result in the loss of open space must result in the improvement and enhancement of the existing facilities. Through the extension of Selborne Walk shopping centre, the Gardens acquire a stronger defined building edge to the north, west and across Selborne Road to the south that frames the open space. The revised garden design could include a hard square which crosses Selborne Road, and a simple formal layout of lawn and gardens. Improvements will also attract more visitors and users of the Gardens (and centre) and provide greater opportunity for an active recreational use within a thriving town centre.

12.9.4 **Re. Option 2 -** This option would result in retaining the green space. However, this would impede vital investment into the centre. Accommodating the extension increase the retail offer in Walthamstow to ensure that the viability and vitality of the town centre is enhanced. The extension provides the opportunity to incorporate ‘larger’ retail units in order to attract high-end retailers for space within this area of the centre. Retail expansion, alongside an improved public realm is considered to offers the greater catalyst for regeneration in the centre.

12.10 **Selborne Walk Shopping Centre**

Alternatives considered
1) Retail led extension(s) with housing on the upper floors
2) Not retail extension, but inclusion of housing
3) No retail extension

Summary of appraisal findings

12.10.1 Option 1 has good potential to encourage investment / ensure viability and add vibrancy to the shopping offer of Walthamstow; however, some green space would be lost. Options 2 and 3 retain the green space but offer less economic advantages.

12.10.2 **Appendix XXVII** presents appraisal findings in full.
The Council’s preferred approach

12.10.3 **The Council’s preferred approach is Option 1.** This proposal will provide additional retail floorspace within the town centre primary shopping area. This site will contribute significantly to the meeting the retail floorspace requirement. It would facilitate vital investment into the centre. Accommodating the extension increase the retail offer in Walthamstow to ensure that the viability and vitality of the town centre is enhanced. The extension provides the opportunity to incorporate ‘larger’ retail units in order to attract high-end retailers for space within this area of the centre. Attracting ‘high’ end retailers into the centre will improve the retail offer in the centre, attract more people to the centre which in term will increase local spend. An eastern extension of The Mall would unfortunately result in the loss of open space, however such an expansion is difficult to provide anywhere else within the centre as high end retailers want to be located close to the other retail outlets such as those located in Selborne Walk shopping centre. The remaining open space will be re-modelled and re-configured to enhance, make best use and add value to the space. This option would provide the opportunity to further intensify uses on this site and significantly contribute to the provision of new homes within the AAP area. Housing on the High street will add further to vitality and viability, increase footfall and spend and improve safety and security with natural surveillance.

12.10.4 **Re. Option 2** - This option would result in retaining the green space. This option would provide the opportunity to further intensify uses on this site and significantly contribute to the provision of new homes within the AAP area. However, this would impede vital investment into the centre. There are few sites within the centre where a significant proportion of retail floorspace can be provided with the retail core of the centre. It will miss the opportunity to provide ‘larger’ retail units which would not attract high-end retailers into the centre. Missed opportunity to enhance the retail offer in the centre, attract new shoppers and new spend into the centre.

12.10.5 **Re. Option 3** - This option would result in retaining the green space. However, this would impede vital investment into the centre. It will miss the opportunity to provide ‘larger’ retail units which would not attract high-end retailers into the centre.

12.11 **Station Car Park**

**Alternatives considered**

1) Housing
2) Retail led mixed use including housing
3) Housing led mixed use including retail

**Summary of appraisal findings**

12.11.1 All options would involve housing on a site that is currently underutilised. Option 1 would contribute most significantly to housing related objectives. Retail led Option 2 would provide job opportunities, although the retail would fall outside of the primary retail area and so could detract from town centre vitality. Option 3 would provide a mix of benefits, but of a lesser magnitude.

12.11.2 **Appendix XXVIII** presents appraisal findings in full.

**The Council’s preferred approach**

12.11.3 **The Council’s preferred approach is Option 1.** This proposal would provide the opportunity to further intensify uses on this site and significantly contribute to the provision of new homes within the AAP area. With its close proximity to public transport this is an ideal site for higher density housing.
12.11.4 Re. **Options 2 and 3** - The retail element of this option was discounted as this site is outside the retail core (not within a secondary or primary shopping frontage) and there is a concern that a retail use could draw footfall/activity and spend away from the town centre. In addition, the site is set back from the street frontage so site access could be difficult.

12.12 **Sainsbury’s Site**

Alternatives considered
1) Retail led mixed use scheme with residential and social Infrastructure
2) Retail

Summary of appraisal findings

12.12.1 Option 1 could contribute most to the vitality and viability of the centre. Option 2 could lead to more employment opportunities but at the expense of a social club with no provision for a replacement.

12.12.2 **Appendix IXXX** presents interim appraisal findings in full.

The Council’s preferred approach

12.12.3 **The Council’s preferred approach is Option 1.** The site is located on the High Street in the primary shopping frontage and so is a prime location for retail. Development of the site provides the opportunity increases the opportunity to create vitality along High Street. The creation of active frontages on Willow Walk and Selborne Road will add life to the existing dead frontages. Redevelopment could also improve the quality of the retail offer within the centre. The Sainsbury's site could be incorporated into a western extension to the Shopping Mall. This option would provide the opportunity to further intensify uses on this site and significantly contribute to the provision of new homes within the AAP area. Housing on the High street will add further to vitality and viability, increase footfall and spend and improve safety and security with natural surveillance. Provides an opportunity to enhance the retail offer in the centre, attract new shoppers and new spend into the centre. Proposal will retain the social club.

12.12.4 Re. **Option 2** - Provides an opportunity to enhance the retail offer in the centre, attract new shoppers and new spend into the centre. However, misses the opportunity to get homes into the heart of the town centre. It will miss the opportunity to further intensify uses on this site and contribute to the provision of new homes within the AAP area. This proposal would not retain the existing social club.

12.13 **Osborne Mews**

Alternatives considered
1) Housing
2) Housing led mixed uses scheme including retail
3) Housing led mixed uses scheme including commercial

Summary of appraisal findings

12.13.1 Option 1 would contribute most to the achievement of housing related objectives. Options 2 and 3 would involve retail and commercial uses that might not be of a scale to be self sustaining in the long term given the location.

12.13.2 **Appendix XXX** presents appraisal findings in full.
The Council’s preferred approach

12.13.3 **The Council’s preferred approach is Option 1.** This option provides the opportunity to further intensify uses on this site and contribute to the provision of new homes within the AAP area. The surrounding uses are residential and the proposed housing use would be compatible.

12.13.4 Re. **Option 2** - This site is located away from the main retail frontage and is thus not considered an appropriate location for retail uses.

12.13.5 Re. **Option 3** - Commercial uses are not considered appropriate as the site is difficult to access by transporter vehicles.

12.14 **Buxton Road Bingo Hall**

Alternatives considered
1) Housing-led mixed use scheme with commercial
2) Leisure led mixed use scheme
3) Housing led mixed use scheme including social infrastructure

Summary of appraisal findings

12.14.1 The site is currently vacant so any development should help to improve the image of the area and enable steps to be taken towards reducing fear of crime. The leisure led Option 2 could lead to footfall being drawn away from the designated ‘Leisure and Entertainment Hub’. Option 3 would provide much needed social infrastructure, but would not increase economic activity.

12.14.2 **Appendix XXXI** presents appraisal findings in full.

The Council’s preferred approach

12.14.3 **The Council’s preferred approach is Option 1.** The site is vacant and underused and therefore there is the opportunity to further intensify uses on this site. Residential use will significantly contribute to the provision of new homes within the AAP area. Residential use will also compliment the surrounding residential uses to the site. Redevelopment provides the opportunity to provide modern or refurbished commercial space which will attract new business opportunities (investment and job creation) into the AAP area. The provision of commercial space will further diversify the local economy and support local business. It further supports the development of the ‘St James Street Quarter’ with office/workshop space for SMEs. The purposed commercial uses will increase the range of uses within the centre and further diversity the local economy. It will support local business and provide for additional (other than retail) employment generating uses.

12.14.4 Re. **Option 2** - This option would provide addition leisure uses into the centre and further diversify uses within the town centre. The Council will seek to concentrate leisure and entertainment use within the ‘Leisure and entertainment’ hub. This site is located outside this area. The site is also set back from the main high street and there is a concern that such a use could draw footfall/activity and spend away from the town centre. It misses the opportunity to provide addition homes in the centre.

12.14.5 Re. **Option 3** - Residential use will significantly contribute to the provision of new homes within the AAP area. Social Infrastructure would provide additional floorspace for such uses. The provision of social infrastructure would further contribute the diversification of uses within the AAP area. This would miss the opportunity to provide much needed commercial space within the town centre and support the commercial element of the St James Street Quarter.
12.15  **8 Buxton Road**

Alternatives considered
1) Social Infrastructure
2) Retail
3) Housing

Summary of appraisal findings

12.15.1 Option 1 would result in increased access to social infrastructure which in turn should contribute positively to the education and skills baseline. Retail or housing uses (Options 2 and 3) would result in a missed opportunity in this respect, and would not result in benefits that outweigh this.

12.15.2 **Appendix XXXII** presents appraisal findings in full.

The Council’s preferred approach

12.15.3 The Council’s preferred approach is Option 1. Social infrastructure use will provide new education facilities in the centre. There are limited opportunities to increase education provision in the centre and as this site is located next to Mission Grove School and thus ideal to include in any proposals to extend the school in order to increase or improve existing education facilities.

12.15.4 Re. **Option 2** - This site is located away from the main retail frontage and is thus not considered an appropriate location for retail uses.

12.15.5 Re. **Option 3** - This option provides the opportunity to further intensify uses on this site and contribute to the provision of new homes within the AAP area. However, given the limited opportunities for education in the centre, this is a preferred option over housing.

12.16  **South Grove**

Alternatives considered
1) Retail led mixed use scheme including residential
2) Residential led mixed uses scheme

Summary of appraisal findings

12.16.1 The current site lies vacant and under utilised therefore both options would enable intensification and in turn simulate economic activity within the plan area. Option 2 would contribute most to meeting housing needs, but the economic potential of the site would not be realised.

12.16.2 **Appendix XXXIII** presents appraisal findings in full.
The Council’s preferred approach

12.16.3 The Council’s preferred approach is Option 1. The site is vacant and underused and therefore there is the opportunity to further intensify uses on this site. This proposal will provide additional retail floorspace within the town centre primary shopping area. This site will contribute significantly to meeting the retail floorspace requirement. It would facilitate vital investment into the centre. The proposals will increase and improve the retail offer in the centre to ensure that the viability and vitality of the town centre is enhanced. There is an opportunity to develop a ‘anchor store’ to attract investment, visitors and spend to this end of the centre. Proposals will achieve active edges/frontages along South Grove to bring vitality to the street and increase natural surveillance. Proposals will Development must therefore seek to reinforce, improve and where possible create linkages between this site and the High Street and St James Street Station, in particular for pedestrians and cyclists. Proposals will contribute to the provision of new homes within the AAP area. Proposals will complement those which are on Brunner Road Industrial Units.

12.16.4 Re. Option 2 - Residential use will significantly contribute to the provision of new homes within the AAP area. However, this option would miss the opportunity for creating a retail anchor store/development to stimulate the regeneration and will attract investment, visitors and spend to this end of the centre and add to the town centre’s vitality and viability.

12.17 Brunner Road Industrial Units

Alternatives considered
1) A mixed use development including retail, commercial, social infrastructure and residential uses
2) Housing led mixed uses scheme including commercial

Summary of appraisal findings

12.17.1 The current site lies vacant and under utilised therefore both options would enable intensification and in turn simulate economic activity within the plan area. Option 2 would contribute most to meeting housing needs, but the economic potential of the site would not be realised.

12.17.2 Appendix XXXIV presents appraisal findings in full.

The Council’s preferred approach

12.17.3 The Council’s preferred approach is Option 1. The site is underused and therefore there is the opportunity to further intensify uses. Residential use will significantly contribute to the provision of new homes within the AAP area. Redevelopment provides the opportunity to provide modern or refurbished commercial space which will attract new business opportunities (investment and job creation) into the AAP area. The provision of commercial space will further diversify the local economy and support local business. The proposed commercial uses will increase the range of uses within the centre and further diversity the local economy. It will support local business and provide for additional (other than retail) employment generating uses. This proposal will provide additional retail floorspace within the town centre. This site will contribute to meeting the retail floorspace requirement. It would facilitate vital investment into the centre. Social Infrastructure would provide additional floorspace for such uses. The provision of social infrastructure would further contribute the diversification of uses within the AAP area. Also, it is considered that this mixed use scheme will complement the proposals on South Grove.

12.17.4 Re. Option 2 - Would limit the potential for new commercial floorspace in the centre restricting investment and business opportunities. A mix of uses would better complement the proposals on South Grove.
12.18 **St James Street Car Park**

**Alternatives considered**
1) Residential led mixed use including retail and or restaurant uses and or social infrastructure
2) Housing

**Summary of appraisal findings**

12.18.1 The car park is currently vacant and both options would deliver much needed intensification. Option 2 would contribute to meeting housing needs, but the economic potential of the site would not be realised.

12.18.2 **Appendix XXXV** presents appraisal findings in full.

**The Council's preferred approach**

12.18.3 **The Council's preferred approach is Option 1.** The site is underused and therefore there is the opportunity to further intensify uses. Additional housing will provide much needed homes in the centre. It's location near to St James Street station makes it an ideal location for housing. Retail/restaurant/social infrastructure on the ground floor will encourage active frontages. Redevelopment also provides an opportunity to improve linkages and connectivity in this area.

12.18.4 Re. **Option 2** - Residential use will significantly contribute to the provision of new homes within the AAP area. However, there is the need to activate the frontage and given the context of this area a retail, restaurant or social infrastructure use should be included.

12.19 **St James Street Health Centre**

**Alternatives considered**
1) Social infrastructure (health) led mixed use including residential
2) Housing led mixed uses scheme including retail

**Summary of appraisal findings**

12.19.1 Option 1 would lead to improved access to social infrastructure. Option 2 would involve loss of an important component of the area’s social infrastructure.

12.19.2 **Appendix XXXVI** presents appraisal findings in full.

**The Council’s preferred approach**

12.19.3 **The Council’s preferred approach is Option 1.** The site is underused and therefore there is the opportunity to further intensify uses. The Council considers that this site is a key site for the delivery of social infrastructure, particularly maintaining and enhancing health facilities in the centre. It's location near to St James Street station makes it an ideal location for housing. Residential use will significantly contribute to the provision of new homes within the AAP area. Social Infrastructure on the ground floor will encourage active frontages.

12.19.4 Re. **Option 2** - Residential use will significantly contribute to the provision of new homes within the AAP area. This proposal will provide additional retail floorspace within the town centre. However, the need for health infrastructure and the existing uses of the site, social infrastructure use is considered to be more of a priority than retail use on this site.
13 PREFERRED OPTIONS

13.1.1 This Chapter summarises the interim SA findings that were fed-back to the Council in relation the early working draft plan approach as set out within the Council’s August 2011 ‘Preferred Options’ consultation document. The Council’s response is also provided.

13.2 Summary of appraisal findings

13.2.1 The following is a summary of some of the key points raised (within the Interim SA Report published alongside the Council’s Preferred Options consultation document):

- Relatively few negative sustainability effects have been identified and these are all minor. The minor negative effects are associated with sites that could encourage increased per capita carbon emissions or increased car dependency and/or traffic congestion. In particular, issues were flagged in relation to ‘EMD Cinema’, ‘Arcade Site’, ‘Selborne Walk Shopping Centre’, ‘Buxton Road Bingo Hall and Car Park’, and ‘South Grove’.

- It was recommended that policy could provide additional detail about the way in which sites could or should be linked with wider blue and green assets. This would help ensure development proposals maximise improvements sought through South Grove, particularly in light of the loss of open space resulting from ‘Arcade Site’ and ‘Town Square and Gardens’.

- It was also suggested that restrictions on private car ownership or opportunities to promote car clubs could be explored to help minimise reliance on private car amongst residents in new housing units. Additionally, the promotion of electric vehicle charge points could be encouraged, particularly in conjunction with opportunity sites that are likely to attract private vehicles (e.g. ‘South Grove’).

13.3 How have these findings been reflected?

13.3.1 In relation to bullet point one, the following amendments have been made. Paragraph 11.12 states, “in accordance with Development Management Policy DM14 - Co-ordinating Land Use and Transport, development proposals where there is expected to be significant transport impacts must be accompanied by a Transport Assessment and a Travel Plan. The Travel Plan should set out a range of actions to encourage safe, healthy and sustainable travel options. Measures will vary depending on site specific circumstances. We will seek that sustainable transport options are incentivised alongside the discouragement of private car use. Travel Plans should take a holistic view and consider a wide range of options to encourage sustainable transport options.”

13.3.2 In relation to bullet point two, the following amendments have been made to the submission draft AAP. Paragraph 12.27 which states, “the Walthamstow Wetlands is located to the west of the centre and is a project that has recently been set up with the aims of establishing a new wetland centre in the area and improving access to these existing open spaces for local communities and regional visitors. We will seek to improve signage and access to this area for the residents of Walthamstow. Walthamstow Village, a conservation area, is located east of the centre and has a variety of shops and businesses.” In addition, paragraph 13.17 states, “Walthamstow is located in an area which is deficient in access to nature conservation and biodiversity (figure 13.1). Walthamstow Wetlands are an exceptional and extensive blue/green asset adjoining the Walthamstow area that are of value in terms of nature conservation and biodiversity. They are designated as both a RAMSAR site and Special Protection Area. These spaces, which include the wider area of the Lee Valley Regional Park, potentially offer access to nature, leisure and recreation for residents and workers in the Walthamstow area. We will seek to create and improve pedestrian and cycle links to this area in order to encourage more people to access and use this natural asset.”
13.3.3 In relation to bullet point three, the following amendments have been made to the submission draft AAP. Paragraph 11.10 states, “where provision for motor vehicles is made, charging stations for electric vehicles are required to be provided in accordance with Development Management policy DM17 - Parking. Charging stations for electric vehicles can facilitate a move towards less polluting vehicles, whilst car clubs can encourage people to drive less by reducing the need for car ownership.” In addition, Paragraph 11.11, states “the Council will also support spaces provided in new development for car clubs in order to further reduce the reliance on the private car.”
PART 3: WHAT ARE THE APPRAISAL FINDINGS AND RECOMMENDATIONS AT THIS CURRENT STAGE?
14 INTRODUCTION (TO PART 3)

The report must include…

- The likely significant effects on the environment associated with the draft plan approach
- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan approach

14.1 The aim of Part 3 is to present appraisal findings and recommendations in relation to the draft (Proposed Submission) plan approach. Part 3 is structured as follows:

- Chapters 15 present an appraisal of the draft (Proposed Submission) Plan under ten ‘sustainability topic’ headings
- Chapter 16 discusses overall conclusions at this current stage
- Chapter 17 summarises outstanding recommendations.

15 APPRAISAL OF THE DRAFT (PROPOSED SUBMISSION) AAP

15.1 Methodology

15.1.1 The appraisal is structured under ‘ten sustainability topic’ headings. The range of topic headings relates to the range of sustainability objectives and issues identified through scoping. Taken together, the sustainability topics, objectives and issues provide a methodological ‘framework’ for the appraisal of likely significant effects on the baseline.

15.1.2 Within each sustainability topic chapter there is an appraisal of: 1) the preferred ‘Area-wide Policies’; and 2) the preferred approach to ‘Key Opportunity Sites’. For both (1) and (2) ‘significant effects’ on the baseline / likely future baseline are identified and evaluated.

15.1.3 Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the plan. The ability to predict effects accurately is also limited by understanding the baseline and (in particular) the future baseline. Because of the uncertainties involved, there is a need to exercise caution when identifying and evaluating significant effects and ensure all assumptions are explained in full. In many instances it is not possible to predict significant effects, but it is possible to comment on the merits of the draft plan approach in more general terms.

15.1.4 It is important to note that effects are predicted taking into account the criteria presented within Schedule 2 of the Regs. So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered. These effect ‘characteristics’ are described within the appraisal as appropriate.

Added structure

15.1.5 To give the appraisal ‘added structure’, each Area-wide Policy and Key Opportunity Site is assigned one of the following symbols in-line with predicted ‘broad implications’. It is important to note that these symbols are not used to indicate significant effects.

<table>
<thead>
<tr>
<th>Symbol</th>
<th>Implication</th>
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<tbody>
<tr>
<td>▶️</td>
<td>Positive implications.</td>
</tr>
<tr>
<td>↔️</td>
<td>No implications.</td>
</tr>
<tr>
<td>◀️</td>
<td>Negative implications.</td>
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<tr>
<td>❓️</td>
<td>Uncertain implications.</td>
</tr>
</tbody>
</table>

18 As stated by Government Guidance (The Plan Making Manual, see http://www.pas.gov.uk/pas/core/page.do?pageId=156210): “Ultimately, the significance of an effect is a matter of judgment and should require no more than a clear and reasonable justification.”

19 Environmental Assessment of Plans and Programmes Regulations 2004
15.2 Air

Relevant sustainability objectives

- Reduce greenhouse gas emissions
- Improve air quality through a reduction in traffic-based emissions

Relevant sustainability issues

- Air pollution from the strategic road network is an issue across the Borough and, more recently, is affecting background locations.

Appraisal of the preferred approach to area-wide policy

|------------------|-----------------------------------------------------|-----------------------|--------------|-------------------------------------------------|-------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------|--------------------------------|--------------------------|--------------------------------|
| Broad Implications | ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔ ↔(convert image to text)
15.2.5 The approach proposed for eight of the opportunity sites (as outlined in the table above) would help to address the **air quality** objectives. This is due to the fact that mixed-use developments located close to public transport links should help reduce the need for people to travel long distances to access key services.

15.2.6 Over the long term, air quality is likely to improve if there is development at sites OS9 and OS10 in particular. With new retail facilities close to **public transport** in OS9, and new centrally located housing at OS10, close to bus, rail and underground transport, it reduces the need for people to use their car travelling elsewhere thus reducing dangerous **greenhouse gases** and carbon emissions.

**Summary**

15.2.7 The area-wide policies collectively have the potential to bring about **positive effects** on the baseline in terms of this topic area. Policies WTC7 and WTC8 are expected to be particularly beneficial introducing sustainable transport methods. Policy WTC8 and the ‘car free’ environments will help to reduce congestion and car emissions.

15.2.8 The policy approach to the key sites is expected to generally have a **positive effect** with many sites being close to public transport. OS 10 and OS 17 propose development on car parks which will help to reduce people’s dependence on the car as there are fewer places to park, encouraging public transport use and reducing overall emissions.

**15.3 Biodiversity**

**Relevant sustainability objectives**

- Objective 17 - To conserve and enhance biodiversity
- Objective 18 - Protect the ecological integrity of Natura 2000 sites

**Relevant sustainability issues**

- Parts of Epping Forest are in an ‘unfavourable’ or ‘unfavourable/declining’ condition
Appraisal of the preferred approach to area-wide policy

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15.3.1  
Policy WTC14 (Access to Sites of Nature Conservation) aims to improve access to nature conservation importance. Walthamstow Town Centre is deficient in access to nature conservation and biodiversity and this policy aims to open up access to the nearby Walthamstow Wetlands and the wider area of the Lee Valley Regional Park. However, the Policy does not include any safeguards to maintain or improve the condition of these areas. The Wetlands are designated as a RAMSAR site and Special Protection Area.

- **Recommendation** – the policy justification for WTC14 should make reference to the need to protect the condition of the Wetlands alongside creating, improving and enhancing links to sites of nature conservation importance.

15.3.2  
Policy WTC10 proposes enhancements and improvements to the quality of green spaces throughout the area. This could potentially lead to a positive impact on biodiversity. Policy WTC 7 (which promote the use of sustainable forms of transport) could also indirectly contribute towards protecting habitats or species sensitive to air, noise or light pollution through reducing emissions resulting from the use of the private car.

Appraisal of the preferred approach to opportunity sites

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15.3.3  
The approach proposed for the three of the opportunity sites (as set out in the table above) is expected to further support the achievement of biodiversity related objectives. The approach proposed for the opportunity sites 7 and 8 also promote new green space which could provide the area with new flora and fauna.

15.3.4  
There are no perceived negative effects on biodiversity at any of the key sites proposed for development. The hedges or trees which are present at any site all have instructions to retain and/or protect them. This is found particularly at OS3, OS8 and OS13. It will therefore be important that this is upheld and any negative impacts are avoided or sufficiently mitigated through careful management of access and other practical measures at the design and implementation phase.
### Summary

15.3.5 There is not too much effect on biodiversity with the area wide policies, although policy WTC14 allows better access and WT10 offers the improvement of public green spaces which should have a positive effect.

15.3.6 In terms of the key sites there is potential for positive effects at OS 7 and OS 14. There is a likely positive effect at OS 8 with the extension of the Town Square gardens.

### 15.4 Crime and safety

#### Relevant sustainability objectives

- Objective 2 - Reduce crime and the fear of crime

#### Relevant sustainability issues

- Crime levels are generally higher in Waltham Forest than nationally

#### Appraisal of the preferred approach to area-wide Policy

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15.4.1 Seven of the policies are likely to have an effect on reducing crime and the fear of crime. Policies 2, 3 and 4 promote increased development of new housing, retail, leisure and entertainment uses both within the town centre and across the Borough more widely. These policies should bring about economic regeneration in the area and help to reduce deprivation locally. The delivery of these uses would improve vitality in the Town Centre, which in turn should lead to a reduction in the risk of crime.

15.4.2 Policies WTC 9 and 10 seek to improve the town centre’s image and public realm with targeted measures to improve the pedestrian environment and other measures to make the centre more attractive and secure. Furthermore, Policy WTC11 sets out the need to protect and improve the streetscape and public realm through improving and enhancing new shop fronts. These measures will contribute towards creating a high quality public realm and safe environment in the Town Centre, which will reduce the risk of crime.

#### Appraisal of the preferred approach to opportunity sites

| Opportunity Sites (OS) | OS 1 – Snooker Hall | OS 2 – Factory Tower | OS 3 – Petrol Station | OS 4 – Tax Office | OS 5 – EMD Cinema | OS 6 – HSBC Site | OS 7 – Arcade Site | OS 8 – Town Square | OS 9 – Soborne Walk | OS 10 – Station Car P | OS 11 – Sandbury’s | OS 12 – Osborne Mews | OS 13 – Burton Bingo | OS 14 – Burton Road | OS 15 – South Grove | OS 16 – Brunner Road | OS 17 – St James’s Car Park | OS 18 – St James’s Health |
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15.4.3 The approach proposed for the seven opportunity sites (as outlined in the table above) is expected to further support the achievement of crime and safety related objectives. The vacant Sites 2, 13, 16 will certainly be positively affected by the proposed development and reduce the risk of crime on the sites through bringing them back into use.

15.4.4 The re-development of many of the sites such as 11 and 7 with mixed-use development that incorporates housing could potentially have a positive effect on reducing crime and the fear of crime through increasing footfall in the area, particularly outside normal working hours.

Summary

15.4.5 There are no specific crime tackling policies although the development of vacant sites will help improve deprived areas. With increased activity and footfall there are likely to be positive effects in this regard.

15.5 Economy

Relevant Sustainability objectives

- Objective 21 - Maintain and enhance the vitality and viability of the Borough’s town centres
- Objective 22 - Improve the local economy by attracting inward investment
- Objective 23 - Maintain stable levels of employment in the Borough

Relevant sustainability issues

- Low levels of economic growth in the Borough
- Declining industrial sectors and under-representation of growth sectors

Appraisal of the preferred approach to area-wide policy

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15.5.1 The pro-growth approach presented within the AAP should contribute significantly to improving the economic viability of the town centre, strengthen the local economy and improve employment opportunities for those that live and work in the area. Increasing the diversity of retail offer and supporting an evening economy will increase the attractiveness of the centre to both local residents and visitors and help mitigate the impact of competition from other expanding centres such as Stratford and Ilford.

15.5.2 The implementation of policy WTC2 (Housing Growth) combined with Walthamstow’s relative housing affordability and good transport links should help to attract both young professionals and families to the area. This will help contribute to the local economy and provide a local workforce for newly created jobs.
An expansion of the retail offer (WTC3) should attract inward investment and deliver a more diverse shopping experience and improve the viability of the town centre. In particular, the proposed creation of a new anchor retail development at South Grove and the requirement for the provision of ‘larger’ modern retail units within any extension to ‘Selbourne Walk Shopping Precinct’ will enhance the retail offer of Walthamstow Town Centre. The development of the ‘Leisure and Entertainment Hub’ and the ‘St James Street Quarter’ will also add to the diversity of the offer within the centre and help market the town. Considering significant expansion of retail offer at other centres including the Westfield shopping centre in Stratford, Walthamstow could miss out on investment in high end retail due to existing offers being provided in nearby towns.

The specific policy on employment (WTC5) promotes the need to develop a strong, balanced and diverse local economic centre. This should improve employment opportunities for all qualification levels, which will contribute towards boosting the local economy.

The movement and accessibility policies which focus on improving sustainable transport choices (WTC6, WTC7 and WTC8) will increase the attractiveness of the area as a place to live and work and will act positively to improve inward investment to the area. This will be supported by the approach to improve the public realm (WTC10) and implementing a new public space strategy (WTC9).

Policy WTC11 (Shop Fronts) sets out the need to protect and improve the streetscape and public realm through improving and enhancing new shop fronts. Improvements to shop fronts within the Town Centre will enhance the vitality and appearance of the area, which in turn will encourage new businesses to locate in the centre and boost the economy.

Collectively these policies should have a positive effect on the baseline in relation to this topic area.

### Appraisal of the preferred approach to opportunity sites

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The approach proposed for 12 of the opportunity sites (as outlined in the table above) would lead to the delivery of employment generating uses (commercial, retail, leisure and entertainment) as part of new development. This is expected to further support the achievement of economic related objectives.

By seeking a mix of uses, including new homes, retail, business space and social infrastructure, the preferred approach to Sites OS7, OS16 and OS18, is likely to result in positive implications in terms of supporting the vitality and viability of the town centre. This is particularly important in the case of OS9 given the prominence of the site.

Re-development of Sites 2, 3 and 16 which are currently vacant to a mixed-use development should help improve the image of the area, and in doing so, should help attract future inward investment. The close proximity of Sites 15-19 should also help regenerate and increase economic activity in the south west area of Walthamstow.
Summary

15.5.11 There are many likely positive effects from the area wide policies and 12 opportunity sites propose employment generating uses. The large scale OS9 Selbourne Walk retail extension in particular has the potential to enhance the vitality and viability of the town centre.

15.6 Employment and skills

Relevant Sustainability objectives

- Objective 5 - Improve educational attainment in schools
- Objective 6 - Improve opportunities for access to education and training for all residents
- Objective 7 - Reduce the overall level of deprivation
- Objective 22 - Improve the local economy by attracting inward investment
- Objective 23 - Maintain stable levels of employment in the Borough.

Relevant sustainability issues

- Average salaries for those working in Waltham Forest are lower than average salaries for those living in the Borough. This disparity could affect the Borough’s ability to attract inward investment.
- Unemployment levels are higher than the average for Great Britain.
- Educational attainment is relatively low and a high proportion of people have no qualifications.

Appraisal of the preferred approach to area-wide policy

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15.6.1 The policies look to build on and reinforce the existing retail offer, increase its diversity and supplement it through particular measures including the creation of a new anchor retail development at South Grove. Policy WTC3 promotes the delivery of a diverse retail offer in the town centre including supporting the existing market. This policy will help maintain existing employment levels and also contribute to new opportunities. Targeted measures under WTC6 to support the development of the ‘Leisure and Entertainment Hub’ and the ‘St James Street Quarter’s will help to bring investment into the centre and increase the number of employment options available.

15.6.2 Policy WTC11 (Shop Fronts) sets out the need to protect and improve the streetscape and public realm through improving and enhancing new shop fronts. Improvements to shop fronts within the Town Centre will enhance the appeal of the area, which in turn will encourage new businesses to locate in the centre and provide further employment opportunities.
15.6.3 Promoting non-retail investment in the town centre (Policy WTC5: Employment) primarily through the identified opportunity sites and the support of a Business Improvement District should enable greater work experience and training opportunities to local residents and contribute to reducing unemployment and improving qualification levels. Indirect effects are likely to be a reduction in the overall level of deprivation through improved employment choice.

15.6.4 Improving the attractiveness of the public realm (WTC9) should increase the attractiveness of the centre to inward investment. Furthermore it will also make the centre a more attractive place to live and work, and attract young professionals and families to the area.

Appraisal of the preferred approach to opportunity sites

| Opportunity Sites (OS) | OS 1 - Snooker Hall | OS 2 - Factory Tower | OS 3 - Petrol Station | OS 4 - Tax Office | OS 5 - EMBC Site | OS 6 - HSBC Site | OS 7 - Arcade Site | OS 8 - Town Square | OS 9 - Selborne Walk | OS 10 - Station Car P | OS 11 - Salisbury’s | OS 12 - Geoscience News | OS 13 - Buxton Bingo | OS 14 - Buxton Road | OS 15 - South Grove | OS 16 - Brunner Road | OS 17 - St James Car Park | OS 18 - St James Health |
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15.6.5 12 of the opportunity sites propose employment generating uses (including retail, commercial, leisure and entertainment), which is expected to further support the achievement of employment and skills related objectives.

15.6.6 There is a significant level of retail development is proposed on sites 9 (Selborne Walk) and 15 (South Grove), which would contribute towards delivering new employment opportunities within the Town Centre. This could help combat the rising unemployment rate of Waltham Forest.

15.6.7 The preferred approach to Site 14: 8 Buxton Road would involve the creation of a new primary school on what is currently a vacant site. Development of the site would not only help to meet the growing demand for primary school places in the area, but bringing the site back into use would also help to enhance the appearance and character of itself and its surroundings; a knock-on effect of this in the longer term would be a likely increase in investment to the area too.

15.6.8 Several of the Opportunity Sites also propose mixed-use developments with A1 uses (for example OS1, 2 and 7. This should also result in new employment opportunities locally, though the majority of these are likely to be lower salary jobs.

Summary

15.6.9 The policies collectively have the potential to bring about positive effects on the baseline for employment and skills. 12 opportunity sites promote employment uses and there is the regeneration of the school in OS14 which will help local education levels. The retail expansion at OS9 will provide good economic activity and should stimulate growth in the centre.

15.7 Housing

Relevant Sustainability objectives

- Objective 1 - Meet local housing needs through the provision of a range of tenures and sizes of new dwellings
- Objective 7 - Reduce the overall level of deprivation
- Objective 11 - Conserve energy
Objective 16 - Make the best use of previously developed land (PDL) and existing buildings

Relevant sustainability issues

- There is a disparity between the cost of housing and the amount that people are able to borrow to purchase a home, which means that many people are unable to access the property market
- There is a potential shortfall in the provision of family accommodation
- There is a shortfall in the provision of affordable housing to meet the requirements of those in housing need

Appraisal of the preferred approach to area-wide policy

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15.7.1 Policy WTC2 (Housing Growth) sets out the need to deliver up to 2,000 new homes within the centre. In the longer term, the delivery of new housing in Walthamstow Town Centre should provide a positive contribution to the Borough’s housing target and housing need. The justification set out for Policy WTC2 within the AAP identifies the need to deliver a mix of unit types (including larger family homes) and tenure types (including quality affordable homes) that is consistent with housing policies outlined in the Adopted Core Strategy and the Emerging Development Management Policies DPD. This should contribute towards ensuring that a sufficient amount of affordable housing and family homes are delivered within Walthamstow Town Centre.

15.7.2 Policies WTC13 should ensure that housing growth is supported by the appropriate social infrastructure in order to mitigate the effects of increased housing provision on existing services.

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15.7.3 The approach proposed for 15 of the opportunity sites (as outlined in the table above) would lead to the delivery of new housing as part of new development. This is expected to further support the achievement of housing related objectives.
15.7.4 The proposals for Sites 10 and 17 would have positive implications for the area by making better use of the site through **providing housing** alongside commercial and business units. They are both in a sustainable location with good accessibility to public transport.

15.7.5 The number of housing sites proposed along with retail units can also provide employment to local people so they don’t have to travel too far to work or access local amenities. This ease of access to shops could be a particularly attractive feature for elderly citizens.

15.7.6 The sites are also likely to have positive implications in terms of **meeting the housing needs** of young professionals already living in the area, it could also provide a catalyst for attracting young professionals to the borough, particularly with the commercial office, residential and mixed use offerings such as Site 4, the old Tax Office and Site 13 the old Buxton Bingo Hall.

**Summary**

15.7.7 In general the main area wide policies will support the housing aims, particularly WTC2 Housing Growth. 15 opportunity sites support residential development. This will have **positive effects** on the baseline and significantly contribute to the housing targets within the AAP boundary.

15.8 **Human health**

**Relevant Sustainability objectives**

- Objective 3 - Improve the standard of health and wellbeing of those who live and work in the Borough
- Objective 4 - Improve the provision of, and access to, community facilities to meet local cultural, recreational and social needs
- Objective 12 - Improve air quality through a reduction in traffic-based emissions

**Relevant sustainability issues**

- Life expectancy is lower than the average for London and the rest of the country
- Health inequalities for Black and Minority Ethnic groups
- The southern part of the Borough is subject to higher levels of poor health, which has been associated with deprivation, poverty and overcrowding.

**Appraisal of the preferred approach to area-wide policy**
15.8.1 The AAP Strategic Objectives 5 and 6 look to improve sustainable transport options translated through the Movement and Accessibility policies. Improving the quality and frequency of public transport provision and increasing accessibility for pedestrians and cyclists within and to/from the town centre through improved cycle networks (Policies WTC6: Transport Improvements and 7: Sustainable Transport) will have beneficial health impacts and help to improve air quality within the borough. This will be supported by ensuring all new residential development is ‘car free’ (WTC8: Car and Cycle Parking) thus encouraging greater walking and cycling for town centre residents.

15.8.2 The effect of targeted policies including WTC4 to improve leisure and entertainment provision within the centre through the delivery of a ‘Leisure and Entertainment Hub’ at the eastern end of the High Street should contribute positively to providing a diverse offering of facilities catering for the local and wider community helping improve social cohesion, reduce exclusion and foster sustainable communities.

15.8.3 Policies WTC10 (High Quality Environment) and WTC9 (Design and Place Making) and WTC14 (Access to Sites of Nature Conservation) also perform well against the health sustainability objectives. These policies reinforce the need to promote walking and cycling and improving the quality of access to green infrastructure within the town centre. Through ensuring best practice in place making within the public realm, there would be benefits in terms of health and well-being. Improved access to sites of nature conservation (WTC15) and seeking improvements to enhance these areas will also have positive health benefits.

15.8.4 Policy WTC13 (Social Infrastructure) identifies the need to avoid the loss of existing social infrastructure in the centre in accordance with policy DM18 of the Emerging Development Management Policies DPD. Policy DM18 makes specific reference to the need to protect and enhance leisure, cultural and health services and facilities. The retention of these facilities in the Town Centre will have a positive effect on improving the standard of health and wellbeing in the area.

**Recommendation** - In Policy WTC13, further detail could be provided on the priority order for social infrastructure.

**Appraisal of the preferred approach to opportunity sites**

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15.8.5 The approach proposed for four of the opportunity sites (as outlined in the table above) would lead to the delivery of new development that would support the achievement of the human health related objectives. In particular, opportunity sites 5 (which will form part of the ‘Leisure and Entertainment Hub’), 6 and 7 propose the development of leisure uses, which would provide the opportunity for people living in Walthamstow to take part in activities to improve their health and well-being.
15.8.6 With all the sites close to public transport, on top of proposed improved cycle access, it is hoped that an increase in walking and cycling will be a positive outcome of development. With less people using their cars for short journeys or journeys they no longer need to make with the closer availability of amenities, this can positively contribute to Walthamstow's public health and well-being.

15.8.7 Opportunity site 18 proposes the development of a new health centre, which would boost the level of social infrastructure (relating to health) within Walthamstow Town Centre. The Opportunity Site indicates there would be expansion and intensification, both important in fulfilling the health needs of local people.

Summary

15.8.8 Overall the policies show there will be positive effects on the human health topic. This is particularly due to sustainable transports measures and reducing the reliance of the car. All developments have good provision of public transport, particularly the areas of residential development such as OS10 and OS17.

15.9 Landscape and townscapes

Relevant Sustainability objectives

- Objective 11 - Conserve Energy
- Objective 16 - Make the best use of previously developed land (PDL) and existing buildings
- Objective 19 - Maintain and enhance the quality of green belt and open space areas
- Objective 20 - Conserve and enhance the historic built and natural environment

Relevant sustainability issues

- Development pressure could lead to the loss of open space or recreation facilities

Appraisal of the preferred approach to area-wide policy

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15.9.2 A number of policies including WTC9 (Design and Place Making) and WTC10 (High Quality Environment) seek to promote significant change to improve the town centre's image. WTC10 states the need to respect the existing character and context while WTC9 aims to significantly raise the quality of architectural and urban design that positively responds to its context including being sympathetic in scale to existing 2-3 storey buildings. These policies should ensure that development is appropriate to and complements the existing townscape. Application of these policies in the delivery of the opportunity sites should ensure that prominent building of architectural merit, including the Former Factory Tower Hamlets Road (Opportunity Site 2) retains its original character and adds value to the townscape.

15.9.3 Policy WTC11 (Shop Fronts) sets out the need to protect and improve the streetscape and public realm through improving and enhancing new shop fronts. Improvements to shop fronts within the Town Centre will further enhance the quality of the built environment in the Town Centre. Opening up access to nature conservation (WTC14) could improve the sense of setting within the town centre by making access to open space easily accessible.

Appraisal of the preferred approach to opportunity sites

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15.9.4 The approach proposed for four of the opportunity sites (as outlined in the table above) would lead to the delivery of new development that would support the achievement of the landscape and townscape related objectives. However, it is noted that a number of the opportunity sites (11, 12, 13, 14, 17 and 18) are located on the Walthamstow Archaeological Priority Zone (the site of a medieval settlement) and further works will be required to ensure that any adverse effect on this site that may arise as a result of new development are mitigated.

15.9.5 The proposed approach to OS5 (EMD Cinema) will have the effect of making good use of listed buildings that are currently underutilised.

Summary

15.9.6 Collectively these policies should have a positive effect on the baseline in relation to this topic area. OS5 proposes to retain the listed cinema building and bring it into better use.

15.10 Transport

Relevant Sustainability objectives

- Objective 8 - Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system
- Objective 10 - Reduce greenhouse gas emissions

Relevant sustainability issues

- Reliance on the private car as the main mode of transport, contributing to air pollution, greenhouse gas emissions and congestion
Increasing car ownership, personal wealth and population is expected to place further demands on the local transport network leading to increased congestion and time spent travelling.

Expansion of the transport network could require additional land that may otherwise have been given to other uses.

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15.10.1 The movement and accessibility policies (Policies WTC 6, 7 and 8) all work to support increased walking, cycling and use of public transport and contribute to improving the environmental and sustainability related transport problems identified in Walthamstow.

15.10.2 Policy WTC6 is likely to deliver significant positive effects and improve opportunities for access to local services, facilities and employment. Improving pedestrian and cycle access between key transport links and creating new walkways will lead to improved connectivity between the centre and surrounding communities, which will decrease reliance on the private car. Improving the quality and frequency of public transport should also help address an overreliance on the private car an reduce the amount of greenhouse gas emissions released as a result of transport.

15.10.3 The implementation of Policy WTC7 will help make the centre a more attractive and safer place for pedestrians and cyclists supporting efforts to increase these forms of transport. Designating all new residential development within the centre as ‘car free’ (WTC8) will add impetus to the need for improved pedestrian and cycle access in Walthamstow Town Centre.

15.10.4 As with the air objectives, the reliance on the car and therefore emissions would be reduced through the implementation of policies WTC3 and WTC5 through ensuring good quality retail and employment opportunities are located within the Town Centre. Policy WTC9 encourages place making and improved cycle routes alongside WTC10 which introduces the ‘Legible London’ way finding scheme and would help discourage people from using the private cars.

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</table>
15.10.5 All of the proposed sites are close to public transport provisions, which help support the achievement of transport related objectives. The 15 housing sites described above in section 20.4 are all suitably serviced by **sustainable methods of transport**. It is also important to note that with the redevelopment of car parks to housing and mixed use developments at OS10 and OS17, it will actively help reduce the number of cars on the road in Walthamstow Town Centre. Numerous sites such as OS9 and OS11 include provisions for junction improvements which will help **traffic flow** and aid **access** to local services.

15.10.6 It noted that land is proposed for a primary school development at OS14, Buxton Road. If a school should come forward at some point in the future, an importance is placed on the proposals including a school travel plan and transport assessment in order to address access issues surrounding Buxton Road. This is similar to the proposed redevelopment of OS18, St James’ Health centre, as it currently becomes very **congested** and as a result of its proposed expansion and increased utilisation, there could be further mobility problems in the surrounding areas.

**Summary**

15.10.7 The area wide policies collectively have the potential to bring about **positive effects** on the baseline in terms of this topic area. There is provision for sustainable transport methods as well as improvements to pedestrian and cycle access. This will help reduce the over reliance of the car in the town centre.

The opportunity sites are all likely to bring about a positive effect to transport and accessibility. With all developments close to public transport and junction amendments planned where necessary. The accessibility through the AAP opportunity sites is set to be **wholly positive**.

15.11 **Waste**

**Relevant Sustainability objectives**

- Objective 9 - Reduce production of waste and increase recycling

**Relevant sustainability issues**

- The amount of waste produced per person is not decreasing over time;
- Although levels of recycling are increasing over time the proportion of waste recycled is not yet meeting Government targets.

**Appraisal of the preferred approach to area-wide policy**

**Area-wide Policy**

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15.11.1 Waste management is not currently a focus of the AAP. It may be expected that high density development and design of new shared / public realm areas will create opportunities for waste management. There is a potential energy from waste opportunity presented in WTC14.
Appraisal of the preferred approach to opportunity sites

<table>
<thead>
<tr>
<th>Opportunity Sites (OS)</th>
<th>Os 1 – Snooker Hall</th>
<th>Os 2 – Factory Tower</th>
<th>Os 3 – Petrol Station</th>
<th>Os 4 – Tax Office</th>
<th>Os 5 – EMD Cinema</th>
<th>Os 6 – HSBC Site</th>
<th>Os 7 – Arcade Site</th>
<th>Os 8 – Town Square</th>
<th>Os 9 – Selbourne Walk</th>
<th>Os 10 – Station Car P</th>
<th>Os 11 – Sainsbury’s</th>
<th>Os 12 – Osborne Mews</th>
<th>Os 13 – Butlers Bingo</th>
<th>Os 14 – Butlers Road</th>
<th>Os 15 – South Grove</th>
<th>Os 16 – Burner Road</th>
<th>Os 17 – St James Car Park</th>
<th>Os 18 – St James Health</th>
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<td>Broad Implications</td>
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15.11.2 Waste management is not currently a focus of the AAP and as a result none of the proposed opportunity sites are expected to further support the achievement of waste related objectives. Site 9: Selbourne Walk Shopping Centre is likely to result in an increase in waste due to the proposed expansion of retail offer, however new developments may also present an opportunity to incorporate facilities that enable easy recycling and waste management.

16 CONCLUSIONS AT THIS CURRENT STAGE

16.1 Pro-growth approach

16.1.1 The pro-growth approach set out in the AAP should contribute significantly to improving the economic viability of the town centre, strengthen the local economy and improve employment opportunities for those that live and work in the area through the delivery of new retail, leisure, entertainment, commercial uses. The AAP policies look to build on and reinforce the existing retail offer, increase its diversity and supplement it through particular measures including the creation of a new anchor retail development at South Grove. The increase in the diversity of retail offer will increase the attractiveness of the centre to both local residents and visitors and help mitigate the impact of competition from other expanding centres such as Stratford and Ilford.

16.1.2 Furthermore, the need to deliver up to 2,000 new homes within the centre is set out within the AAP (Policy WTC2: Housing Growth). In the longer term, the delivery of new housing in Walthamstow Town Centre should provide a positive contribution to the Borough’s housing target and housing need. The AAP identifies the need to deliver a mix of unit types (including larger family homes) and tenure types (including quality affordable homes) that is consistent with housing policies outlined in the Adopted Core Strategy and the Emerging Development Management Policies DPD. This should contribute towards ensuring that a sufficient amount of affordable housing and family homes are delivered within Walthamstow Town Centre.

16.2 Improving the local environment

16.2.1 The AAP provides a number of measures to improve the frequency of public transport within the Town Centre and to increase the accessibility of the Town Centre to cyclists and pedestrians through an improved cycle network and pedestrian links. Overall, these measures should help address an overreliance on the private car and reduce the amount of greenhouse gas emissions released as a result of transport. In turn this will help to improve air quality within Walthamstow Town Centre, which will have a beneficial impact on health and well being.

16.2.2 The AAP highlights the need to improve leisure and entertainment provision within the centre through the delivery of a ‘Leisure and Entertainment Hub’ at the eastern end of the High Street (Policy WTC4). This should contribute positively to providing a diverse offering of facilities catering for the local and wider community, helping improve social cohesion, reduce exclusion and foster sustainable communities.
16.2.3 Walthamstow Town Centre benefits from a wealth of historic buildings providing character and a sense of place to the town. The AAP sets out a pro-growth development framework to improve the town’s offering, diversify its offer and attract investment, whilst providing a range of measures that aim to protect the quality of the built environment located within the Town Centre (WTC 9 and 10).

16.3 Key opportunity sites

16.3.1 Eighteen opportunity sites are identified within the AAP for a range of uses including retail, housing, commercial, social infrastructure and green space. The delivery of these sites will contribute towards: providing employment opportunities in the Town Centre; boosting retail provision; enhancing the vitality and viability of the Town Centre; and reducing the need to travel. The preferred approach to many of the opportunity sites has been identified subsequent to a careful consideration (informed by SA) of alternative aspirations.

16.4 Overall conclusion

16.4.1 The policies and key opportunity sites brought forward in the AAP will contribute towards tackling key issues present within Walthamstow Town Centre. New retail, residential, leisure, entertainment and employment sites will be created to provide new employment and housing opportunities in the area. Furthermore, improvements proposed to public transport, pedestrian and cycling links within the Town Centre, along with improvements to the public realm, will enhance the vitality of the area. The Council has developed the preferred strategy in light of a detailed understanding of the various issues (sometimes competing) that exist and the implications of alternative approaches that might be taken.

17 RECOMMENDATIONS AT THIS CURRENT STAGE

17.1.1 The following is a summary of the recommendations presented above. These recommendations will be taken into account when finalising the plan (alongside appraisal findings more generally, and consultation responses received as part of the current consultation).

<table>
<thead>
<tr>
<th>Recommendation</th>
<th>To ensure performance of the plan is maximised in terms of …</th>
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<tbody>
<tr>
<td>The policy justification for WTC14 should make reference to the need to protect the condition of the Wetlands alongside creating, improving and enhancing links to sites of nature conservation importance.</td>
<td>Objective 17 - To conserve and enhance biodiversity</td>
</tr>
<tr>
<td>In Policy WTC13, further detail could be provided on the priority order for social infrastructure.</td>
<td>Objective 4 - Improve the provision of, and access to, community facilities to meet local cultural, recreational and social needs</td>
</tr>
</tbody>
</table>
PART 4: WHAT ARE THE NEXT STEPS (INCLUDING MONITORING)?
18  INTRODUCTION (TO PART 4)

The SA Report must include…
- A description of the measures envisaged concerning monitoring

18.1.1 As such, this Part of the SA Report explains the next steps that will be taken as part of the plan-making / SA process, including in relation to monitoring.

19  PLAN FINALISATION, ADOPTION AND MONITORING

19.1.1 Following consultation the Council may choose (depending on whether any significant issues remain outstanding) to make modifications to the Proposed Submission version of the Plan in light of consultation responses, the findings and recommendations set out within this SA Report or any other new sources of evidence that emerge. The Local Plan will then be submitted to Government for ‘Examination in Public’.

19.1.2 At the time of Adoption a ‘Statement’ must published that sets out (amongst other things):
- How this SA Report and responses received as part of the current consultation have been taken into account when finalising the plan; and
- Measures decided concerning monitoring.

19.1.3 At the current stage (i.e. within the SA Report), there is a need to present ‘measures envisaged concerning monitoring’ only. As such, set out below are measures that might be taken to monitor development of those sites where the SA has found there to be constraints.

19.1.4 The following is suggested:
- The creation of cycle and pedestrian links and improvements to public transport provision are identified as key actions within the AAP. The Council might ideally wish to monitor the transport choices taken by new and existing residents.
- The SA has identified a number of positive impacts in relation to residential development in the Town Centre. The amount of new housing delivered within the centre could be a focus for monitoring going forward.
- The SA has identified a number of positive impacts in relation to the local economy and employment. It will be important to monitor development within the Town Centre with a view towards boosting the local economy and creating new job opportunities.
- Crime is identified as a particular issue within the AAP. This could be a focus of monitoring going forward.
- The importance of good design in order to avoid impacts to heritage assets has been identified through this SA. This could be a focus of monitoring going forward.
APPENDIX I: REGULATORY REQUIREMENTS

The Introduction to this SA Report explains that, in order to demonstrate compliance with the requirements of the Environmental Assessment Regulations 2004, SA Reports must answer four questions. Table 1.1 of the Introduction then ‘makes the links’ between requirements of the Regs and these four questions. Table 1.1 is reproduced below (as Table 1). The right-hand column of Table 1 does not quote directly from the Regs, but rather reflects a degree of interpretation. As such, Table 2 explains this interpretation. The following points supplement Table 2.

- References to ‘plan or programme’ have been shortened to ‘plan’.

- Reference to ‘the environmental protection objectives, established at international, Community or Member State level…’ is shortened to ‘the environmental protection objectives, established at international or national level…’

- The requirement to provide 1) ‘an outline of the … relationship [of the plan] with other relevant plans and programmes’ and 2) ‘the environmental protection objectives…’ is taken to mean that a review of the relevant context should be provided.

- The requirement to provide an explanation of ‘the way [environmental protection] objectives and any environmental considerations have been taken into account during [plan] preparation’ is taken as indicating that the SA Report must explain how SA has influenced development of the draft plan.

- The reference to issues that might be a focus of SEA is not given prominence. This reflects the fact that these issues are merely suggested; and that a foremost consideration when undertaking SEA should be the fact that the Regulations are of a procedural nature, i.e. do not seek to prescribe substantive issues that should be a focus. These issues are a material consideration nonetheless.

- The need to provide ‘an outline of the reasons for selecting the alternatives dealt with’ is taken to have a dual meaning:
  1) There is a need to justify the range of alternatives considered (and indeed, the range of issues for which alternatives were considered)
  2) There is a need to explain the reasons for selecting preferred alternatives / the preferred approach to addressing each of the key issues in question. This requirement tallies with the requirement to explain ‘the way [environmental protection] objectives and any environmental considerations have been taken into account during [plan] preparation’

- The requirement to explain ‘the likely significant effects…’ is assumed to relate to both the draft plan and alternatives.

- The reference to providing ‘a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information’ is not given prominence. This is purely for reasons of brevity. Methodology is explained where relevant in the report.

- Reference to ‘in accordance with Article 10’ is removed for brevity.

- Finally, it will be noted that references to ‘the environment’ have been retained, despite the fact that the starting assumption that there is a need to give particular attention to environmental issues does not apply to SA.
Table 1: Questions that must be answered within the SA Report

<table>
<thead>
<tr>
<th>SA REPORT QUESTION</th>
<th>SUB-QUESTION</th>
<th>CORRESPONDING REQUIREMENT (THE REPORT MUST INCLUDE…)</th>
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<tbody>
<tr>
<td>What's the scope of the SA?</td>
<td>What's the Plan seeking to achieve?</td>
<td>• An outline of the contents and main objectives of the plan</td>
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<td>What's the sustainability 'context'?</td>
<td>• The relationship of the plan with other relevant plans and programmes</td>
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<td></td>
<td></td>
<td>• The relevant environmental protection objectives, established at international or national level</td>
</tr>
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<td></td>
<td>What's the sustainability 'baseline' at the current time?</td>
<td>• The relevant aspects of the current state of the environment</td>
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<td>• The environmental characteristics of areas likely to be significantly affected</td>
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<td></td>
<td>What's the baseline projection?</td>
<td>• The likely evolution of the current state of the environment without implementation of the plan</td>
</tr>
<tr>
<td></td>
<td>What are the key issues that should be a focus of SA?</td>
<td>• Any existing environmental problems / issues which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance</td>
</tr>
<tr>
<td>What has Plan-making / SA involved up to this point?</td>
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<td>• An outline of the reasons for selecting the alternatives dealt with (and thus an explanation of why the alternatives dealt with are ‘reasonable’)</td>
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<td></td>
<td>• The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting preferred alternatives / a description of how environmental objectives and considerations are reflected in the draft plan.</td>
</tr>
<tr>
<td>What are the appraisal findings at this current stage?</td>
<td></td>
<td>• The likely significant effects on the environment associated with the draft plan</td>
</tr>
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<td></td>
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<td>• The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan</td>
</tr>
<tr>
<td>What happens next (including monitoring)?</td>
<td></td>
<td>• A description of the measures envisaged concerning monitoring</td>
</tr>
</tbody>
</table>
## Table 2: Interpreting regulatory requirements

<table>
<thead>
<tr>
<th>Interpretation of the requirements (as presented in Table 1, above)</th>
<th>Requirements of Schedule 2 of the Regs (the report must include...)</th>
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<tbody>
<tr>
<td>An outline of the contents, main objectives of the plan</td>
<td>(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;</td>
</tr>
<tr>
<td>The relationship of the plan with other relevant plans and programmes</td>
<td>(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan</td>
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<tr>
<td>The environmental protection objectives, established at international or national level, relevant to the plan</td>
<td>(c) the environmental characteristics of areas likely to be significantly affected;</td>
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<tr>
<td>The relevant aspects of the current state of the environment</td>
<td>(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;</td>
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<tr>
<td>The environmental characteristics of areas likely to be significantly affected</td>
<td>(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;</td>
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<tr>
<td>The likely evolution [of the baseline] without implementation of the plan</td>
<td>(f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;</td>
</tr>
<tr>
<td>Any existing environmental problems / issues which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance</td>
<td>(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;</td>
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<tr>
<td>An outline of the reasons for selecting the alternatives dealt with</td>
<td>(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information</td>
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<tr>
<td>The likely significant effects on the environment associated with alternatives / An outline of the reasons for selecting preferred alternatives / a description of how environmental objectives and considerations are reflected in the draft plan.</td>
<td>(i) a description of the measures envisaged concerning monitoring.</td>
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<td>The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan</td>
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<tr>
<td>A description of the measures envisaged concerning monitoring</td>
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APPENDIX II: ALTERNATIVES APPRAISAL (HOUSING GROWTH)

Introduction
As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising the following alternative area-wide policy approaches to housing growth:

1. Up to 2,000 new homes; develop opportunity sites; housing as part of mixed-use schemes; infill development; and housing above shops or upper floors.

2. Up to 1,000 homes. No promotion of housing above shops.

The interim appraisal findings are presented in full within this Appendix. The appraisal table should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Proposed Submission AAP.

Methodology
For each of the alternatives, the appraisal identifies and evaluates ‘likely significant effects’ on the baseline / likely future baseline, drawing on the sustainability objectives identified through scoping (see Part 1 of the main report) as a methodological framework.

Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the alternatives policy approaches under consideration. The ability to predict effects accurately is also limited by understanding of the baseline and (in particular) the future baseline. In light of this, where likely significant effects are predicted this is done with an accompanying explanation of the assumptions made.

In many instances it is not possible to predict significant effects, but it is possible to comment on the merits of alternatives in more general terms. This is helpful, as it enables a distinction to be made between alternatives even where it is not possible to distinguish between them in terms of ‘significant effects’.

It is important to note that effects are predicted taking into account the criteria presented within Schedule 2 of the Regs. So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered. These effect ‘characteristics’ are described within the appraisal as appropriate.

The following symbols are used to provide a visual indication of effects:

<table>
<thead>
<tr>
<th>Significant positive effect on Objective</th>
<th>Positive effect on Objective</th>
<th>Negative effect on Objective</th>
<th>Significant negative effect on Objective</th>
<th>Uncertain effect on Objective due to unknown factors</th>
<th>No effect on Objective</th>
</tr>
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</table>

Appraisal findings

<table>
<thead>
<tr>
<th>Sustainability Objective</th>
<th>Option 1</th>
<th>Option 2</th>
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<tbody>
<tr>
<td>1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings</td>
<td>[Symbol not specified] (++) in long term</td>
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"Ultimately, the significance of an effect is a matter of judgment and should require no more than a clear and reasonable justification."

****** Environmental Assessment of Plans and Programmes Regulations 2004
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<th>Reduce crime and the fear of crime</th>
<th>Improve standard of health and wellbeing of those who live and work in the Borough</th>
<th>Increase the provision of and access to community facilities to meet local cultural, recreational and social needs</th>
<th>Improve educational attainment in schools</th>
<th>Improve opportunities for access to education and training for all residents</th>
<th>Reduce the overall level of deprivation</th>
<th>Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system</th>
<th>Reduce production of waste and increase recycling</th>
<th>Reduce greenhouse gas emissions</th>
<th>Conserve energy</th>
<th>Improve air quality through a reduction in traffic-based emissions</th>
<th>Improve water quality and ensure the efficient use of water resources</th>
<th>Reduce the risk of flooding</th>
<th>Reduce contamination and safeguard soil quality and quantity</th>
<th>Make the best use of previously developed land</th>
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**Summary**

In the long term, (1) would provide a significant positive contribution to the Borough’s housing target and housing need (even though it may be difficult to provide family homes, these will still be considered on a site by site basis) and enhance the vitality and viability of the Town Centre. Providing new housing in Walthamstow Town Centre is also likely to contribute positively to reducing crime and the fear of crime and increasing access to community facilities. (2) would also contribute positively to the same sustainability objectives described above in relation to (1); however, significant positive effects would be unlikely given the lower quantum of growth proposed.
APPENDIX III: ALTERNATIVES APPRAISAL (HOUSING DENSITY)

Introduction
As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising the following alternative area-wide policy approaches to housing density:

1. Densities between 200-700 hrha; higher densities surrounding Walthamstow central & St James Street stations; and lower densities near other low density residential areas and near Leucha Road and Walthamstow St James conservation areas.
2. Densities over 700 hrha in the town centre.
3. Build housing at lower densities up to 500 hrha.

The interim appraisal findings are presented in full within this Appendix. The appraisal table should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Proposed Submission AAP.

Methodology
See Appendix II, above.

Appraisal findings

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<th>Option 3</th>
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<td>4. Increase the provision of and access to community facilities to meet local cultural, recreational and social needs</td>
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<td>5. Improve educational attainment in schools</td>
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<td>Improve opportunities for access to education and training for all residents</td>
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<td>Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system</td>
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<td>Reduce the overall level of deprivation</td>
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<td>Reduce production of waste and increase recycling</td>
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<td>9</td>
<td>Reduce greenhouse gas emissions</td>
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<td>Conserve energy</td>
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<td>Improve air quality through a reduction in traffic-based emissions</td>
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<td>Improve water quality and ensure the efficient use of water resources</td>
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<td>Reduce contamination and safeguard soil quality and quantity</td>
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<td>Conserve and enhance biodiversity</td>
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21. Maintain and enhance the vitality and viability of the Borough’s town centres
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22. Improve the local economy by attracting inward investment
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23. Maintain stable levels of employment in the Borough
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**Summary**

(1) would likely result in positive effects in terms of ‘making the most effective and efficient use of land and buildings’. This approach recognises that high density housing can have drawbacks, and seeks to mitigate this by: a) identifying that there will also be a need for areas of lower density development; and b) promoting high density in suitable locations. Aiming to ensure that new housing schemes propose densities appropriate to the character and context of Walthamstow would also likely have positive effects in terms of the historic environment. Also, allowing for higher densities in highly accessible locations (PTAL score 6a) would likely reduce the need for a private car with positive benefits in terms of improving air quality.

(2) would also likely have significant positive effects in terms of making the most effective and efficient use of land. However, effects in terms of the historic environment are uncertain. Much would depend on implementation at the project level, but it is possible that there could be negative effects in terms of loss of historic character.

(3), is in accordance with the Core Strategy (Policy CS2) and the draft replacement London Plan density matrix. However as Walthamstow is a location where higher housing densities are considered to be acceptable, to build up to a density of 500 hrha where it would be possible to build at higher densities would not make the best use of previously developed land.
APPENDIX IV: ALTERNATIVES APPRAISAL (AFFORDABLE HOUSING)

Introduction
As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising the following alternative area-wide policy approaches to affordable housing:

1. Maximise affordable housing (AH) in the centre; at least 50% (site-by-site basis) subject to viability; where viability reduces AH below 50% - shortfall to be made up by an off site payment in lieu; and tenure split of 60% social rented and 40% intermediate, particularly shared ownership.
2. AH on site reduced to below 50%.
3. Allow a higher proportion of intermediate housing in the centre.

The interim appraisal findings are presented in full within this Appendix. The appraisal table should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Proposed Submission AAP.

Methodology
See Appendix II, above

Appraisal findings

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| 22. Improve the local economy by attracting inward investment | ~ | ~ | ~ |
| 23. Maintain stable levels of employment in the Borough | ~ | ~ | ~ |

**Summary**

(1) would contribute to meeting local housing needs by maximising affordable housing in the centre by specifying 50% affordable housing on site (subject to viability on a site by site basis), requiring any shortfall to make a one off site payment in lieu and providing a tenure split of 60% Social Rented and 40% intermediate housing. In the short term, however, it may be difficult to meet the affordable housing target due to viability.

Reducing the level of affordable housing sought on site to below 50% (2) in order to improve development viability is incompatible with the Borough wide affordable housing target and would not be likely to contribute significantly to addressing affordable housing need in Walthamstow.

(3) would likely have a positive impact on meeting local housing needs by allowing a higher proportion of intermediate housing in the centre to increase home ownership opportunities for people who cannot afford to buy a home outright as the Borough contains a high proportion of rented homes.
APPENDIX V: ALTERNATIVES APPRAISAL (HOUSING UNIT MIX)

Introduction
As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising the following alternative area-wide policy approaches to housing unit mix:

1. Negotiate unit mix on a site by site basis (focus on family housing on sites close to west of the centre close to St James Street station); and where family housing is provided, locate on the ground floor where it has access to private usable amenity space.

2. Housing mix of: 10% 1 bed, 40% 2 bed, 40% 3 bed & 10% one bed for market housing; and 10% 1 bed, 30% 2 bed, 50% 3 bed & 10% 4 bed for affordable tenures in accordance with emerging Development Management Policies.

3. Seek a higher proportion of family homes (three bed plus) across all tenures.

The interim appraisal findings are presented in full within this Appendix. The appraisal table should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Proposed Submission AAP.

Methodology
See Appendix II, above

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</table>
21. Maintain and enhance the vitality and viability of the Borough’s town centres

22. Improve the local economy by attracting inward investment

23. Maintain stable levels of employment in the Borough

Summary

Through (1), unit mix would be decided on a site by site basis. This approach would have an uncertain effect in terms of meeting local housing needs as unit mix would be negotiated according to each site instead of contributing toward meeting a particular target. Focusing family housing in particular areas and locating it on the ground floor to allow for private usable amenity space would contribute to maintaining and enhancing the quality of open space areas and hence contribute to improving health and wellbeing.

The housing mix identified as part of (2) is in accordance with emerging Development Management Policies. This approach would assist with meeting housing mix needs Borough wide through setting proportions for market and affordable housing. However this may not be appropriate for the AAP area.

Seeking a higher proportion of family homes (3) across all tenures would prioritise one housing need over others. It is uncertain whether the Town Centre is the appropriate area in the Borough to prioritise family homes above others as the success of this approach would also be dependent on sites and viability.

At the interim appraisal stage, the following recommendation was made:

- More evidence should be provided in relation to housing need in order to justify the preferred housing mix.
**APPENDIX VI: ALTERNATIVES APPRAISAL (RETAIL)**

**Introduction**

As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising the following alternative area-wide policy approaches to retail:

1. Develop opportunity sites for new retail uses; include retail as part of mixed use development; allow the extension of sites to increase retail floorspace; consolidate retail development within the centre in the designated primary and secondary retail frontages; upgrade and further diversify overall range, mix and quality of uses within the centre; promote, support and enhance the development of Walthamstow Market; and ensure no over concentration or clustering of Hot Food Takeaways, betting shops, estate agents and off licences.

2. Extend the town centre boundary to incorporate additional sites which could provide retail uses.

The interim appraisal findings are presented in full within this Appendix. The appraisal table should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Proposed Submission AAP.

**Methodology**

See Appendix II, above

**Appraisal findings**

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### Summary

Upgrading and diversifying the existing retail offering and targeted development of opportunity sites (1) would help to support and consolidate the town centre’s vitality while providing a catalyst for attracting inward investment. The extent to which site extensions would affect the quality of open space is unclear and would depend on site specific design; however, increased retail floorspace and the development of the market should provide improved employment opportunities.

Extension of the town centre boundary (2) would have the potential to ‘dilute’ the existing diverse and independent retail offering by drawing investment to new areas away from the existing town centre. However, additional sites for retail use, particularly if of sufficient size to support ‘high end’ retailers could provide opportunities to a wider variety of retailers and help support greater inward investment.

At the interim appraisal stage, the following recommendation was made:

- Promote the integration of high end retailers within the existing centre to maximise diversity and vitality of retail offer while ensuring valued local retail provision is supported.
APPENDIX VII: ALTERNATIVES APPRAISAL (HOT FOOD TAKEAWAYS, ESTATE AGENTS, BETTING SHOPS AND OFF LICENCES OPTIONS)

Introduction
As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising the following alternative area-wide policy approaches to hot food takeaways, estate agents, betting shops and off licences:

1. Resist the development of any additional Hot Food Takeaway, Estate Agent, Betting Shop or Off Licence and seek to reduce numbers which already exist within the centre.
2. Allow (10%) of such to be able to be located or part of the secondary shopping frontage.

The interim appraisal findings are presented in full within this Appendix. The appraisal table should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Proposed Submission AAP.

Methodology
See Appendix II, above

Appraisal findings

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8. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system

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10. Reduce greenhouse gas emissions

11. Conserve energy

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15. Reduce contamination and safeguard soil quality and quantity

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17. Conserve and enhance biodiversity

18. Protect the ecological integrity of Natura 2000 sites

19. Maintain and enhance the quality of the green belt and open space areas

20. Conserve and, where appropriate, enhance the historic environment

21. Maintain and enhance the vitality and viability of the Borough’s town centres

22. Improve the local economy by attracting inward investment

23. Maintain stable levels of

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### Summary

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Hot food takeaways and betting shops etc. are over concentrated in the town centre. Resisting additional development and seeking to reduce the existing offer (1) would free up retail space for other businesses providing the opportunity to enhance and not undermine the vitality and viability of the centre.

Breaking up the clustering of existing hot food takeaways and betting shops (2) would aesthetically improve the visual appearance of the high street. However, relocating these businesses to another part of the high street does not reduce their overconcentration within the town centre as a whole nor provide the opportunity for other businesses to enter the high street in their place.
APPENDIX VIII: ALTERNATIVES APPRAISAL (PUBS)

Introduction
As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising the following alternative area-wide policy approaches to pubs:

1. Resist the loss of any existing pubs within the centre and seek to promote healthy pubs.
2. Not protect or promote healthy pubs within the centre.

The interim appraisal findings are presented in full within this Appendix. The appraisal table should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Proposed Submission AAP.

Methodology
See Appendix II, above

Appraisal findings

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**Summary**

Resisting the loss of existing pubs (1) would help preserve the area’s historic environment and help maintain stable employment in this sector. The promotion of healthy pubs would enhance the evening economy and
provide opportunities for new establishments helping maintain the vitality of the town centre and draw in new investment. New pubs would also provide a variety of new employment opportunities.

(2) is appraised on the assumption that the aim would be to resist the loss of existing pubs but not actively protect or promote healthy pubs. Given the picture nationally that pubs are closing at an increasing rate, there may be little the Council can do to resist further loss of existing pubs without active intervention. It is possible that existing pubs would close and be converted to other use. This could impact on the local historic environment of the town centre and undermine the vitality and viability of the town centre, in particular impacting the evening economy. The extent to which employment opportunities would be impacted is unclear and would depend on the nature of any change of use of the premises.

At the interim appraisal stage, the following recommendations were made:

- A definition of ‘healthy pub’ should be provided in the Glossary to ensure a consistent understanding of the use of this term.
APPENDIX IX: ALTERNATIVES APPRAISAL (LEISURE. ENTERTAINMENT, CULTURE AND TOURISM)

Introduction
As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising the following alternative area-wide policy approaches to leisure, entertainment, culture and tourism:

1. Developing opportunity sites for new leisure, entertainment, cultural and leisure uses; support the development of a ‘Leisure Zone and Entertainment’ (eastern end of the High Street); support the creation of a ‘Cultural Café Quarter’ (western end of the High Street); and facilitate and support the growth of the evening economy, with particular focus in the ‘Leisure and Entertainment Zone’ and ‘Cultural Café Quarter’.

2. Not to develop any leisure or cultural uses within the centre.

3. Not to seek to develop the evening economy within the centre.

The interim appraisal findings are presented in full within this Appendix. The appraisal table should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Proposed Submission AAP.

Methodology
See Appendix II, above

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21. Maintain and enhance the vitality and viability of the Borough’s town centres

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22. Improve the local economy by attracting inward investment

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23. Maintain stable levels of employment in the Borough

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**Summary**

The development of opportunity sites and identified areas for leisure and entertainment with the focus on supporting the growth of the evening economy (1) would likely result in:

- increased footfall and hence reduced crime and fear of crime;
- improved entertainment, leisure and cultural uses in the town centre, which would contribute to well-being objectives; and
- an improved ‘image’ for the town centre, which in turn could increase the attractiveness of the town centre as a recreation and tourism destination and also increase the ‘confidence’ of potential inward investor (which in turn could enhance employment opportunities in the Borough).

The town centre lacks non-retail uses such as leisure, tourism and cultural facilities despite its proximity to a large local population and good transport links. (2) would not improve this situation and hence would fail to address local need. This approach would result in a missed opportunity to be gained from the influx of tourists as part of the Olympics legacy experience. The existing poor evening economy contributes to a deserted high street in the evening where people can feel unsafe and a lack of investment in creating an evening economy would not help address this issue. The lack of a strong policy promoting development would fail to attract inward investment and provide the means to enhance the vitality and viability of the town centre. Consequently, businesses could choose to locate to other centres such as Stratford, Ilford and Enfield.

The town centre has a limited evening economy which contributes to a centre that feels ‘dead’ and unsafe in the evening. Failing to address this (3) would not reduce crime and the fear of crime. Furthermore, it would result in a missed opportunity to diversify the local economy and provide incentives for new investment with consequential impacts on local employment.
APPENDIX X: ALTERNATIVES APPRAISAL (EMPLOYMENT)

Introduction
As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising the following alternative area-wide policy approaches to employment:

1. Protect existing employment uses within the centre; further diversify range of employment generating uses within the centre; develop opportunity sites for new office space; encourage the development of creative and cultural industries; and support the development of a Business Improvements District.

2. Seek to significantly change the role and function of the centre and make it a location for office and business use. Seek to provide a significant increase in the amount of high quality and adaptable office and business floorspace within the centre.

The interim appraisal findings are presented in full within this Appendix. The appraisal table should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Proposed Submission AAP.

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22. Improve the local economy by attracting inward investment

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23. Maintain stable levels of employment in the Borough

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Summary

Walthamstow centre has been underperforming for a number of years and if this trend continues the centre will increasingly lose out to other centres which are diversifying and expanding. (1) would help halt this decline. Development of the distinct leisure zone and café quarter would appeal to a wider audience and draw in additional visitors. The opportunity sites would help support this offering and also provide additional office and work space to support the business sector. (1) represents a balanced and flexible framework approach to delivering a diverse and attractive town centre and would contribute the successful regeneration of the centre.

Increasing office and business uses (2) would help diversify and provide greater balance to the local economy. (2) would likely attract inward investment; however it would also ultimately lead to an over concentration of such uses and a lack of diversification for the local economy. It is not clear whether a change of role and function to office and business use would result in a mismatch between local people’s skills and business need. Furthermore, reducing the availability of business premises to support an evening economy could lead to increased crime and fear of crime.

At the interim appraisal stage, the following recommendation was made:

- Seek to provide a combination of the (1) and (2). While protecting existing employment uses there could also be opportunity to designate specific areas in the AAP to accommodate new office and business uses, including high quality and adaptable office and business floorspace.
APPENDIX XI: ALTERNATIVES APPRAISAL (TRANSPORT IMPROVEMENTS)

Introduction

As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising the following alternative area-wide policy approaches to transport improvements:

1. Work with TFL and other transport providers to ensure there is sufficient capacity on existing bus and rail transport systems; simplify the layout of the gyratory system on Hoe Street; improve pedestrian crossings at a) High Street/Hoe Street, b) Hoe Street/ Selborne Road c) Walthamstow Central exit/Seborne Road/Bus Station and d) Palmerston Road/High Street; establish a pedestrian and cycle link between key transport interchanges at Walthamstow Queens Road and Walthamstow Central; create a new walkway(s) under the Liverpool Street to Chingford line; improve north/south links; improve the lighting in and around the centre; and requiring new development to provide financial contributions towards projects that enhance the transport network in the centre.

2. Take a ‘do nothing’ approach.

The interim appraisal findings are presented in full within this Appendix. The appraisal table should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Proposed Submission AAP.

Methodology

See Appendix II, above

Appraisal findings

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<tbody>
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<td>Work with TFL and other transport providers to ensure there is sufficient capacity on existing bus and rail transport systems; simplify the layout of the gyratory system on Hoe Street; improve pedestrian crossings at a) High Street/Hoe Street, b) Hoe Street/ Selborne Road c) Walthamstow Central exit/Seborne Road/Bus Station and d) Palmerston Road/High Street; establish a pedestrian and cycle link between key transport interchanges at Walthamstow Queens Road and Walthamstow Central; create a new walkway(s) under the Liverpool Street to Chingford line; improve north/south links; improve the lighting in and around the centre; and requiring new development to provide financial contributions towards projects that enhance the transport network in the centre.</td>
<td>Other than a ‘do nothing’ approach, it is considered that there are no alternative options for this policy as the proposals in it are essential to the enhancement and regeneration of the centre.</td>
</tr>
<tr>
<td>2. Reduce crime and the fear of crime</td>
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</tbody>
</table>
3. Improve standard of health and wellbeing of those who live and work in the Borough ~ ~

4. Increase the provision of and access to community facilities to meet local cultural, recreational and social needs + ~

5. Improve educational attainment in schools ~ ~

6. Improve opportunities for access to education and training for all residents ~ ~

7. Reduce the overall level of deprivation ~ ~

8. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system + (++ in medium and long term) ~

9. Reduce production of waste and increase recycling ~ ~

10. Reduce greenhouse gas emissions + ~

11. Conserve energy ~ ~

12. Improve air quality through a reduction in traffic-based emissions + ~

13. Improve water quality and ensure the efficient use of water resources ~ ~

14. Reduce the risk of flooding ~ ~

15. Reduce contamination and safeguard soil quality and quantity ~ ~

16. Make the best use of previously developed land (PDL) and existing buildings ~ ~

17. Conserve and enhance biodiversity ~ ~
18. Protect the ecological integrity of Natura 2000 sites | ~ | ~ | ~  
19. Maintain and enhance the quality of the green belt and open space areas. | ~ | ~ | ~  
20. Conserve and, where appropriate, enhance the historic environment | ~ | ~ | ~  
21. Maintain and enhance the vitality and viability of the Borough’s town centres | + | | -  
22. Improve the local economy by attracting inward investment | ~ | ~ | ~  
23. Maintain stable levels of employment in the Borough | ~ | ~ | ~  

**Summary**

In the medium to long term, (1) would likely achieve significant positive effects in terms of sustainability objectives that relate to increasing ‘accessibility’ to employment / services etc. There could also be benefits in terms of reducing greenhouse gas emissions, improving air quality (through a reduction in traffic-based emissions) and maintaining / enhancing the vitality and viability of the town centre.

The appraisal has shown that a ‘do nothing’ approach (2) would result in a continuation of existing problems in terms of poor accessibility to employment / services etc for those that live and work in the Borough, car dependency (and associated air pollution) and vitality / viability of the town centre.

At the interim appraisal stage, the following recommendation was made:

Provide further details on measures being take to increase pedestrian and cycle access beyond just the town centre to ensure links are made with other networks.
APPENDIX XII: ALTERNATIVES APPRAISAL (SUSTAINABLE TRANSPORT)

Introduction
As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising the following alternative area-wide policy approaches to sustainable transport:

1. Support a range of improvements to promote and enhance the environment for pedestrians and cyclists; and improve the cycle network in the centre.
2. Prioritise initiatives which upgrade and improve the existing road network and promote the use of the private car as the main form of transport to access the centre.

The interim appraisal findings are presented in full within this Appendix. The appraisal table should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Proposed Submission AAP.

Methodology
See Appendix II, above

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<td>3. Improve standard of health and wellbeing of those who live and work in the Borough</td>
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<td>4. Increase the provision of and access to community facilities to meet local cultural, recreational and social needs</td>
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<tr>
<td>5. Improve educational attainment in schools</td>
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<tr>
<td>6. Improve opportunities for access to education and training for all residents</td>
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<td>7. Reduce the overall level of ~</td>
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<td>8.</td>
<td>Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system</td>
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<td>9.</td>
<td>Reduce production of waste and increase recycling</td>
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<td>10.</td>
<td>Reduce greenhouse gas emissions</td>
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<td>Conserve energy</td>
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<td>15.</td>
<td>Reduce contamination and safeguard soil quality and quantity</td>
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<td>19.</td>
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<td>20.</td>
<td>Conserve and, where appropriate, enhance the historic environment</td>
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<td>21.</td>
<td>Maintain and enhance the vitality and viability of the Borough’s town centres</td>
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<tr>
<td>22.</td>
<td>Improve the local economy by attracting inward investment</td>
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</table>
23. Maintain stable levels of employment in the Borough

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**Summary**

Supporting other forms of sustainable transport to make the centre more attractive and safe for pedestrians and cyclists and improve networks (1) would have benefits for health, access, integrating sustainable transport and reducing greenhouse gas emissions.

Evidence reveals that the centre can become heavily congested with traffic at particular times, causing significant delays. Prioritising initiatives which upgrade and improve the existing road network and promoting the use of the private car as the main form of transport to access the centre (2) would therefore result in negative effects in terms of sustainability objectives.
APPENDIX XIII: ALTERNATIVES APPRAISAL (CAR AND CYCLE PARKING)

Introduction
As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising the following alternative area-wide policy approaches to car and cycle parking:

1. Ensure that all new residential development within the centre is ‘car free’ incorporating the appropriate level of cycle parking; and ensure that all new retail, leisure, community and cultural uses provide appropriate levels of car and cycle parking.
2. Provide additional car parking within the town centre for car borne visitors to the centre.
3. Allow an element of car parking in residential development.

The interim appraisal findings are presented in full within this Appendix. The appraisal table should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Proposed Submission AAP.

Methodology
See Appendix II, above.

Appraisal findings

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<th>Option 2</th>
<th>Option 3</th>
</tr>
</thead>
<tbody>
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<td>1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings</td>
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<tr>
<td>2. Reduce crime and the fear of crime</td>
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<tr>
<td>3. Improve standard of health and wellbeing of those who live and work in the Borough</td>
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</tr>
<tr>
<td>4. Increase the provision of and access to community facilities to meet local cultural, recreational and social needs</td>
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<tr>
<td>5. Improve educational attainment in schools</td>
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</table>
6. Improve opportunities for access to education and training for all residents  
7. Reduce the overall level of deprivation  
8. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system  
9. Reduce production of waste and increase recycling  
10. Reduce greenhouse gas emissions  
11. Conserve energy  
12. Improve air quality through a reduction in traffic-based emissions  
13. Improve water quality and ensure the efficient use of water resources  
14. Reduce the risk of flooding  
15. Reduce contamination and safeguard soil quality and quantity  
16. Make the best use of previously developed land (PDL) and existing buildings  
17. Conserve and enhance biodiversity  
18. Protect the ecological integrity of Natura 2000 sites  
19. Maintain and enhance the quality of the green belt and open space areas.  
20. Conserve and, where appropriate, enhance the historic environment  
21. Maintain and enhance the
vitality and viability of the Borough’s town centres

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<td>22. Improve the local economy by attracting inward investment</td>
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**Summary**

Ensuring that all new residential development within the centre is ‘car free’ and incorporates an appropriate level of cycle parking, together with an approach that ensures all new retail, leisure, community and cultural uses provide appropriate levels of car and cycle parking (1), would have benefits in terms of a sustainability objectives relating to: health, access to employment and services; access to an integrated a sustainable transport system; reducing greenhouse gas emissions; improving air quality through a reduction in traffic-based emissions; and enhancing the town centre.

Evidence suggests that it is considered unnecessary to provide additional car parking given that various car parks within the centre are under utilised and are only close to capacity at peak time during the weekend. (2) would have negative effects in terms of: enabling access to an integrated sustainable transport system; reducing greenhouse gas emissions; and addressing air quality problems.

The sustainability impacts of (3) would depend on the specifics of how much car parking is allowed or accommodated in residential development (e.g. only for disabled residents), where the residential development is located, whether any quotas are applied (e.g. one car per household), and the extent of ‘car free’ development.
APPENDIX XIV: ALTERNATIVES APPRAISAL (HIGH QUALITY ENVIRONMENT)

Introduction
As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising the following alternative area-wide policy approaches to high quality environment:

1. Improve the town centre's image and public realm; the market and pedestrian circulation; apply 'High Street Life Strategy' principles to new shop fronts on Hoe, High and St James Streets; designate Hoe Street as an 'Area of Public Realm Improvement'; improving the pedestrian environment and by including Walthamstow as part of the 'Legible London' way finding scheme; protecting and enhancing the heritage of the centre; removing unnecessary obstacles, barriers and street clutter within the public realm; enhancing and improving the quality of green spaces throughout the centre; providing play facilities in the centre (particularly in areas of deficiency); incorporating improvements to the public realm to make the centre more active and secure; and requiring new development to provide financial contributions towards projects that enhance the existing public realm.

2. Take a 'do nothing' approach.

The interim appraisal findings are presented in full within this Appendix. The appraisal table should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Proposed Submission AAP.

Methodology
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Appraisal findings

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<td>Other than a 'do nothing' approach, it is considered that there are no alternative options for this policy as the proposals in it are essential to the enhancement and regeneration of the centre.</td>
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<tr>
<td>2.</td>
<td>Reduce crime and the fear of crime</td>
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<td>4.</td>
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<td>19. Maintain and enhance the quality of the green belt and open space areas.</td>
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<td>21. Maintain and enhance the vitality and viability of the Borough’s town centres</td>
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<tr>
<td>22. Improve the local economy by attracting inward investment</td>
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<tr>
<td>23. Maintain stable levels of employment in the Borough</td>
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</table>

**Summary**
(1) would result in significant improvements to the town centre's image and public realm. At the same time, (1) would also ensure that change occurs in such a way that ensures existing local character is respected. The approach would likely have benefits in terms of reducing crime; improving health and wellbeing; enabling access to community facilities and open spaces; enhancing the historic environment, ensuring the vitality and viability of the town centre; and attracting inward investment.

The appraisal has shown that a ‘do nothing’ approach (2) would lead to a continuation of negative trends in terms of a number of sustainability objectives. This approach would not be conducive to the enhancement and regeneration of the centre.
APPENDIX XV: ALTERNATIVES APPRAISAL (DESIGN AND PLACE MAKING)

Introduction
As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising the following alternative area-wide policy approaches to design and place making:

1. Use the following “place-making” principles as a framework when considering new development and improvements within the centre - creating, improving and reinforcing convenient and safe pedestrian and cycle routes to the town centre; improving the key “arrival” points into the centre via environmental improvements; significantly raising the quality of architectural and urban design in the area; setting a framework for building heights of new development to be sympathetic in scale to the predominant 2-3 storey context, whilst focussing taller buildings in key “gateway” sites; encouraging restoration and ongoing improvement of existing buildings of character within the centre; a range of options for improving the town square and gardens; a new public space strategy; incorporating “active building frontages” in all new development; a management regime for the area to reinforce the town centre offer for shoppers and visitors.

2. Create a new character and context for the centre by creating landmark buildings, encouraging distinctive and contemporary design and establishing new building forms and character areas.

The interim appraisal findings are presented in full within this Appendix. The appraisal table should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Proposed Submission AAP.

Methodology
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<tr>
<td><strong>Reduce crime and the fear of crime</strong></td>
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<tr>
<td><strong>Improve standard of health and wellbeing of those who live and work in the Borough</strong></td>
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Option 1:
Use the following “place-making” principles as a framework when considering new development and improvements within the centre - creating, improving and reinforcing convenient and safe pedestrian and cycle routes to the town centre; improving the key “arrival” points into the centre via environmental improvements; significantly raising the quality of architectural and urban design in the area; setting a framework for building heights of new development to be sympathetic in scale to the predominant 2-3 storey context; whilst focussing taller buildings in key “gateway” sites; encouraging restoration and ongoing improvement of existing buildings of character within the centre; a range of options for improving the town square and gardens; a new public space strategy; incorporating “active building frontages” in all new development; a management regime for the area to reinforce the town centre offer for shoppers and visitors.

Option 2:
To creating a new character and context for the centre by creating landmark buildings, encouraging distinctive and contemporary design and establishing new building forms and character areas.
<table>
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<td><strong>8.</strong> Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system</td>
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<td><strong>21.</strong> Maintain and enhance the vitality and viability of the Borough’s town centres</td>
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<tr>
<td><strong>22.</strong> Improve the local economy by attracting inward investment</td>
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</table>
23. Maintain stable levels of employment in the Borough

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Summary

(1) would involve following “place-making” principles as a framework when considering new development and improvements within the centre. The approach would have benefits in terms of health and wellbeing; access to community facilities and open spaces; enhancement of the historic environment; maintenance of vitality and viability within the town centre; and attracting inward investment.

Creating a ‘new character’ for Walthamstow (2) could make it possible to better capitalise on an overall design and place making strategy particularly for Walthamstow. ‘Creating a new character’ could also help to address some existing local problems. For example, the town gardens are underused and don’t function well. Improving the town gardens holistically as part of a ‘new character’ with other open space and/or public realm areas could be more effective. However, a ‘new character’ and context would also need to seek to ensure that any change occurs in such a way that respects existing local character and context to be preserved.

At the interim appraisal stage, the following recommendation was made:

- Develop a preferred policy approach that reflects aspects of both alternatives (1) and (2). Such an approach would involve improving and protecting local character and context as well as looking to create in appropriate areas a ‘new character’ to better capitalise on the place making strategy.
APPENDIX XVI: ALTERNATIVES APPRAISAL (SOCIAL INFRASTRUCTURE)

Introduction

As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising the following alternative area-wide policy approaches to social infrastructure:

1. Provision of amenities on mixed use sites with a high density of residential use and grant planning permission for community uses and social infrastructure: as part of mixed-use development on the Opportunity Sites; in other accessible locations, where an active ground floor street frontage is provided; contributions will be sought through planning obligations to support the provision of new social infrastructure or the expansion or improvement of existing facilities to meet the needs of the community; and wherever possible, new facilities should be a multi-use and be accessible by all members of the community.

2. Prioritise the delivery of the most important forms of social infrastructure health and education.

The interim appraisal findings are presented in full within this Appendix. The appraisal table should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Proposed Submission AAP.

Methodology

See Appendix II, above

Appraisal findings

<table>
<thead>
<tr>
<th>Sustainability Objective</th>
<th>Option 1</th>
<th>Option 2</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Provision of amenities on mixed use sites with a high density of residential use and grant planning permission for community uses and social infrastructure: as part of mixed-use development on the Opportunity Sites; in other accessible locations, where an active ground floor street frontage is provided; contributions will be sought through planning obligations to support the provision of new social infrastructure or the expansion or improvement of existing facilities to meet the needs of the community; and wherever possible, new facilities should be a multi-use and be accessible by all members of the community.</td>
<td>To prioritise the delivery the most important forms of social infrastructure health and education.</td>
</tr>
<tr>
<td>1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings</td>
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</tr>
<tr>
<td>2. Reduce crime and the fear of crime</td>
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</tr>
<tr>
<td>3. Improve standard of health and wellbeing of those who live and work in the Borough</td>
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<tr>
<td>Number</td>
<td>Objective</td>
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<tr>
<td>4.</td>
<td>Increase the provision of and access to community facilities to meet local cultural, recreational and social needs</td>
<td>+</td>
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<td>5.</td>
<td>Improve educational attainment in schools</td>
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<tr>
<td>6.</td>
<td>Improve opportunities for access to education and training for all residents</td>
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<tr>
<td>7.</td>
<td>Reduce the overall level of deprivation</td>
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<tr>
<td>8.</td>
<td>Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system</td>
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<td>9.</td>
<td>Reduce production of waste and increase recycling</td>
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<td>10.</td>
<td>Reduce greenhouse gas emissions</td>
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</tr>
<tr>
<td>11.</td>
<td>Conserve energy</td>
<td>~</td>
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<tr>
<td>12.</td>
<td>Improve air quality through a reduction in traffic-based emissions</td>
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<td>13.</td>
<td>Improve water quality and ensure the efficient use of water resources</td>
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<td>14.</td>
<td>Reduce the risk of flooding</td>
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<td>15.</td>
<td>Reduce contamination and safeguard soil quality and quantity</td>
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<tr>
<td>16.</td>
<td>Make the best use of previously developed land (PDL) and existing buildings</td>
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<td>17.</td>
<td>Conserve and enhance biodiversity</td>
<td>~</td>
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<tr>
<td>18.</td>
<td>Protect the ecological integrity of Natura 2000 sites</td>
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<td>19.</td>
<td>Maintain and enhance the</td>
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<tr>
<td>quality of the green belt and open space areas.</td>
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<tr>
<td>20. Conserve and, where appropriate, enhance the historic environment</td>
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<tr>
<td>21. Maintain and enhance the vitality and viability of the Borough’s town centres</td>
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<td>22. Improve the local economy by attracting inward investment</td>
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<tr>
<td>23. Maintain stable levels of employment in the Borough</td>
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</tbody>
</table>

**Summary**

(1) looks to ensure that housing growth is supported by the appropriate social infrastructure. The approach would have benefits in terms of: health; access to community facilities; access to education and training; and making the best use of PDL (through encouraging provision of amenities on mixed use sites with a high density of residential use).

While (1) looks to provide social infrastructure to support housing growth, (2) seeks to prioritise health and education infrastructure. Even though (2) also performs well against sustainability objectives, the options in this instance are not able to be directly compared due to their difference in emphasis.

At the interim appraisal stage, the following recommendation was made:

- The preferred policy approach should provide further detail on the priority order for social infrastructure.
APPENDIX XVII: ALTERNATIVES APPRAISAL (DECENTRALISED ENERGY)

Introduction
As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising the following alternative area-wide policy approaches to decentralised energy:

1. To facilitate a CHP and district heating system to supply the centre with energy by: requiring developments in the area to contribute towards establishing the system; connecting public sector buildings and redeveloped Council properties to the network in order to provide sufficient anchor loads; requiring all new development to link to the system, subject to viability; requiring all development which comes forward before the system is established to be ‘connection ready’; and safeguarding routes for pipelines.

2. Take a ‘do nothing’ approach.

The interim appraisal findings are presented in full within this Appendix. The appraisal table should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Proposed Submission AAP.

Methodology
See Appendix II, above.

Appraisal findings

<table>
<thead>
<tr>
<th>Sustainability Objective</th>
<th>Option 1</th>
<th>Option 2: Not to facilitate and promote CHP and district heating system in the centre.</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings</td>
<td>~</td>
<td>~</td>
</tr>
<tr>
<td>2. Reduce crime and the fear of crime</td>
<td>~</td>
<td>~</td>
</tr>
<tr>
<td>3. Improve standard of health and wellbeing of those who live and work in the Borough</td>
<td>~</td>
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</tr>
<tr>
<td>4. Increase the provision of and access to community facilities to meet local cultural</td>
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</tr>
<tr>
<td>recreational and social needs</td>
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<tr>
<td>------------------------------------------------------</td>
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</tr>
<tr>
<td>5. Improve educational attainment in schools</td>
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<tr>
<td>6. Improve opportunities for access to education and training for all residents</td>
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<tr>
<td>7. Reduce the overall level of deprivation</td>
<td>~</td>
<td>~</td>
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<tr>
<td>8. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system</td>
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<tr>
<td>9. Reduce production of waste and increase recycling</td>
<td>~</td>
<td>~</td>
</tr>
<tr>
<td>10. Reduce greenhouse gas emissions</td>
<td>+</td>
<td>++ in long term</td>
</tr>
<tr>
<td>11. Conserve energy</td>
<td>+</td>
<td>++ in long term</td>
</tr>
<tr>
<td>12. Improve air quality through a reduction in traffic-based emissions</td>
<td>~</td>
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<tr>
<td>13. Improve water quality and ensure the efficient use of water resources</td>
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<tr>
<td>14. Reduce the risk of flooding</td>
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<tr>
<td>15. Reduce contamination and safeguard soil quality and quantity</td>
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<tr>
<td>16. Make the best use of previously developed land (PDL) and existing buildings</td>
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<tr>
<td>17. Conserve and enhance biodiversity</td>
<td>~</td>
<td>~</td>
</tr>
<tr>
<td>18. Protect the ecological integrity of Natura 2000 sites</td>
<td>~</td>
<td>~</td>
</tr>
<tr>
<td>19. Maintain and enhance the quality of the green belt and open space areas.</td>
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</tr>
</tbody>
</table>
## Summary

(1) would have benefits in the short to medium term and significant positive effects in the long term in terms of reducing greenhouse gas emissions. The policy aims to facilitate a CHP and district heating system to supply the centre with energy, requiring contributions from developers, subject to viability.

Not to facilitate and promote CHP and district heating system in the centre (2) would lead to significant negative and negative effects in terms of the sustainability objective to reduce greenhouse gas emissions. Furthermore, this approach would not be conducive to meeting the significant heat demand that exists at a number of sites/buildings within the centre. It is acknowledged, however, that the cost of implementing a district heating system is high and that seeking contributions from developers could have implications in terms of development viability.

At the interim appraisal stage, the following recommendation was made:

- There may be a need to investigate the viability of other technology if it were found that the cost of implementation of the district heating system is so high that it would affect development viability.

### Table 1: Key Policies and Appraisal

<table>
<thead>
<tr>
<th>Policy Description</th>
<th>Appraisal</th>
<th>Appraisal</th>
</tr>
</thead>
<tbody>
<tr>
<td>20. Conserve and, where appropriate, enhance the historic environment</td>
<td>~</td>
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<tr>
<td>21. Maintain and enhance the vitality and viability of the Borough’s town centres</td>
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<tr>
<td>22. Improve the local economy by attracting inward investment</td>
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<tr>
<td>23. Maintain stable levels of employment in the Borough</td>
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</tbody>
</table>
APPENDIX XVIII: ALTERNATIVES APPRAISAL (ACCESS TO SITES OF NATURE CONSERVATION)

Introduction
As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising the following alternative area-wide policy approaches to access to sites of nature conservations:

1. Improve access to sites of nature conservation importance by: creating, improving and enhancing links to sites of nature conservation importance; and seeking developer contributions to create, improve and enhance links to sites of nature conservation importance.

2. Not to link the town centre with areas of nature conservation importance which are located nearby.

The interim appraisal findings are presented in full within this Appendix. The appraisal table should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Proposed Submission AAP.

Methodology
See Appendix II, above.

Appraisal findings

<table>
<thead>
<tr>
<th>Sustainability Objective</th>
<th>Option 1</th>
<th>Option 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings</td>
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<td>~</td>
</tr>
<tr>
<td>2. Reduce crime and the fear of crime</td>
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<td>~</td>
</tr>
<tr>
<td>3. Improve standard of health and wellbeing of those who live and work in the Borough</td>
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<td>-</td>
</tr>
<tr>
<td>4. Increase the provision of and access to community facilities to meet local cultural, recreational and social needs</td>
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</tr>
<tr>
<td>5. Improve educational attainment in schools</td>
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<td>~</td>
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<tr>
<td>6. Improve opportunities for access to education and training for all residents</td>
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<td>7.</td>
<td>Reduce the overall level of deprivation</td>
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<td>8.</td>
<td>Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system</td>
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<td>9.</td>
<td>Reduce production of waste and increase recycling</td>
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<td>10.</td>
<td>Reduce greenhouse gas emissions</td>
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<td>11.</td>
<td>Conserve energy</td>
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<td>12.</td>
<td>Improve air quality through a reduction in traffic-based emissions</td>
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<td>Improve water quality and ensure the efficient use of water resources</td>
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<td>Reduce the risk of flooding</td>
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<td>15.</td>
<td>Reduce contamination and safeguard soil quality and quantity</td>
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<td>16.</td>
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<tr>
<td>17.</td>
<td>Conserve and enhance biodiversity</td>
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<td>18.</td>
<td>Protect the ecological integrity of Natura 2000 sites</td>
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<td>19.</td>
<td>Maintain and enhance the quality of the green belt and open space areas.</td>
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<td>20.</td>
<td>Conserve and, where appropriate, enhance the historic environment</td>
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<td>21.</td>
<td>Maintain and enhance the vitality and viability of the Borough’s town centres</td>
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<td>22.</td>
<td>Improve the local economy by</td>
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<td>attracting inward investment</td>
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<tr>
<td>23. Maintain stable levels of employment in the Borough</td>
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</tbody>
</table>

**Summary**

(1) looks to improve access to sites of nature conservation importance as the centre is deficient in access to nature conservation and biodiversity. The approach would have benefits for health, access to recreational needs, conserving and enhancing biodiversity, and maintaining and enhancing the quality of open space areas.

To not provide a link the town centre with areas of nature conservation importance which are located nearby (2) would not address the deficiency that exists in terms of access to nature or be conducive with the achievement of other, wide-ranging sustainability objectives.

At the interim appraisal stage, the following recommendation was made:

- In promoting access to areas of nature conservation importance, the preferred policy approach should clearly specify that any increase in access should not lead to detrimental effects in terms of biodiversity.
APPENDIX IXX: ALTERNATIVES APPRAISAL (SNOOKER HALL SITE)

Introduction
As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising the following alternative approaches to developing the Snooker Hall Site:

1) Housing led mixed use scheme including social infrastructure
2) Retain use for leisure
3) Housing led mixed uses scheme including retail

The interim appraisal findings are presented in full within this Appendix. The appraisal table should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Proposed Submission AAP.

Methodology
See Appendix II, above

Appraisal findings

<table>
<thead>
<tr>
<th>Sustainability Objective</th>
<th>Option 1 Housing led mixed use scheme including social infrastructure</th>
<th>Option 2 Retain use for leisure</th>
<th>Option 3 Housing led mixed uses scheme including retail</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings</td>
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<tr>
<td>2. Reduce crime and the fear of crime</td>
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<tr>
<td>3. Improve standard of health and wellbeing of those who live and work in the Borough</td>
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</tr>
<tr>
<td>4. Increase the provision of and access to community facilities to meet local cultural, recreational and social needs</td>
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<tr>
<td>5. Improve educational attainment in schools</td>
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<tr>
<td>6. Improve opportunities for access to education and training for all residents</td>
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<td>7. Reduce the overall level of deprivation</td>
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<tr>
<td>8. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system</td>
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<td>9. Reduce production of waste and increase recycling</td>
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<tr>
<td>10. Reduce greenhouse gas emissions</td>
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<td>11. Conserve energy</td>
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<tr>
<td>12. Improve air quality through a reduction in traffic-based emissions</td>
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<tr>
<td>13. Improve water quality and ensure the efficient use of water resources</td>
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<td>14. Reduce the risk of flooding</td>
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<tr>
<td>15. Reduce contamination and safeguard soil quality and quantity</td>
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</tr>
<tr>
<td>16. Make the best use of previously developed land (PDL) and existing buildings</td>
<td>+</td>
<td>+</td>
<td>+</td>
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<tr>
<td>17. Conserve and enhance biodiversity</td>
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</tr>
<tr>
<td>18. Protect the ecological integrity of Natura 2000 sites</td>
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<tr>
<td>19. Maintain and enhance the quality of the green belt and open space areas.</td>
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<tr>
<td>20. Conserve and, where appropriate, enhance the historic environment</td>
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<td>~</td>
</tr>
<tr>
<td>21. Maintain and enhance the vitality and viability of the Borough’s town centres</td>
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<td>-</td>
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</tr>
<tr>
<td>22. Improve the local economy by attracting inward investment</td>
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<td>+</td>
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<tr>
<td>23. Maintain stable levels of employment in the Borough</td>
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</tbody>
</table>

**Summary**

(1) has the advantage of providing new housing where there is currently under utilisation of a building. It will make better use of the previously developed land, intensifying the land use. As a ‘gateway’ site it provides a good location to services and enhances the vitality of the Borough contributing to housing targets within the town centre. The social infrastructure will provide an improvement in the level of deprivation and access to education.

(2) similarly creates a better use of the land, improving leisure facilities. This will improve the health and wellbeing of people in the Borough and particularly help improve access to community facilities. This option doesn’t include housing nor will it improve the vitality or viability of the town centre though as it is deemed on the periphery of the AAP boundary. This is a cause for concern as there is potential to draw footfall/activity away from the centre.

Mixing housing and retail (3) is again an intensification of the currently under utilised land use. There will be the creation of job opportunities and reducing levels of deprivation, however again as the site falls on the periphery of the AAP boundary, it is too far removed from the primary and secondary shopping areas therefore likely to draw footfall/activity away from the town centre.
Introduction
As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising the following alternative approaches to developing the Tower Hamlets Road Site:

1) Housing led mixed use scheme including commercial use
2) Retain as commercial use
3) Housing

The interim appraisal findings are presented in full within this Appendix. The appraisal table should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Proposed Submission AAP.

Methodology
See Appendix II, above

Appraisal findings

<table>
<thead>
<tr>
<th>Sustainability Objective</th>
<th>Option 1 Housing led mixed use scheme including commercial use</th>
<th>Option 2 Retain as commercial use</th>
<th>Option 3 Housing</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings</td>
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<td>2. Reduce crime and the fear of crime</td>
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<td>8. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system</td>
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<td>19. Maintain and enhance the quality of the green belt and open space areas.</td>
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<td>23. Maintain stable levels of employment in the Borough</td>
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</table>

**Summary**

(1) would enable the site to become utilised again as it currently lies vacant. It will provide contributions to housing targets as well as providing jobs with its commercial use. This will help attract investment and jobs to the area.

(2) would improve the previously developed land however the fact that current commercial use lies vacant is indicative that purely commercial use may not be a viable option.

(3) provides new homes in the AAP area, it also will improve the previously vacant site and contribute to housing targets. No job opportunities come with this option however and therefore no new investment or employment.
APPENDIX XXI: ALTERNATIVES APPRAISAL (PETROL STATION HOE STREET SITE)

Introduction
As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising the following alternative approaches to developing the Petrol Station Hoe Street Site:

1) Housing led mixed use scheme including social infrastructure
2) Housing
3) Housing led mixed use scheme including retail

The interim appraisal findings are presented in full within this Appendix. The appraisal table should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Proposed Submission AAP.

Methodology
See Appendix II, above

Appraisal findings

<table>
<thead>
<tr>
<th>Sustainability Objective</th>
<th>Option 1 Housing led mixed use scheme including social infrastructure</th>
<th>Option 2 Housing</th>
<th>Option 3 Housing led mixed use scheme including retail</th>
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</thead>
<tbody>
<tr>
<td>1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings</td>
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<tr>
<td>2. Reduce crime and the fear of crime</td>
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<tr>
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<td>6. Improve opportunities for access to education and training for all residents</td>
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</table>
### Summary

1. Provides the housing boost with the benefits of social infrastructure too. This will help to increase access to amenities and education.

2. Provides a purely housing option, boosting numbers in the AAP boundary but without the additional benefits of social infrastructure.

3. Has the inclusion of retail to housing which can provide jobs for local people. This however will detract from the town centre’s primary and secondary shopping areas which could reduce vitality/viability by drawing footfall elsewhere.
APPENDIX XXII: ALTERNATIVES APPRAISAL (TAX OFFICE SITE)

Introduction
As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising the following alternative approaches to developing the Tax Office Site:

1) Commercial (office) led mixed use scheme with residential
2) Retail led mixed use scheme including housing
3) Housing

The interim appraisal findings are presented in full within this Appendix. The appraisal table should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Proposed Submission AAP.

Methodology
See Appendix II, above

Appraisal findings

<table>
<thead>
<tr>
<th>Sustainability Objective</th>
<th>Option 1 Commercial (office) led mixed use scheme with residential</th>
<th>Option 2 Retail led mixed use scheme including housing</th>
<th>Option 3 Housing</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings</td>
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<tr>
<td>11. Conserve energy</td>
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</table>
12. Improve air quality through a reduction in traffic-based emissions

13. Improve water quality and ensure the efficient use of water resources

14. Reduce the risk of flooding

15. Reduce contamination and safeguard soil quality and quantity

16. Make the best use of previously developed land (PDL) and existing buildings

17. Conserve and enhance biodiversity

18. Protect the ecological integrity of Natura 2000 sites

19. Maintain and enhance the quality of the green belt and open space areas.

20. Conserve and, where appropriate, enhance the historic environment

21. Maintain and enhance the vitality and viability of the Borough’s town centres

22. Improve the local economy by attracting inward investment

23. Maintain stable levels of employment in the Borough

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<td>23. Maintain stable levels of employment in the Borough</td>
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</table>

**Summary**

(1) combines commercial use with housing, providing the opportunities of employment and inward investment, alongside the contribution to housing targets.

(2) introduces retail to the area alongside housing however whilst improving housing numbers, similarly to other sites it will reduce activity in the town centre. It does provide opportunities for employment however.

(3) eliminates any retail or commercial use providing a sole housing boost. This however eliminates the opportunity of future investment from commercial use as well as meaning people currently in commercial employment lose jobs.
# APPENDIX XXIII: ALTERNATIVES APPRAISAL (EMD CINEMA SITE)

## Introduction
As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising the following alternative approaches to developing the EMD Cinema Site:

1) Leisure led mixed use scheme
2) Social infrastructure (place of worship) led mixed uses scheme
3) Housing led mixed uses scheme

The interim appraisal findings are presented in full within this Appendix. The appraisal table should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Proposed Submission AAP.

## Methodology
See Appendix II, above

## Appraisal findings

<table>
<thead>
<tr>
<th>Sustainability Objective</th>
<th>Option 1 Leisure led mixed use scheme</th>
<th>Option 2 Social infrastructure (place of worship) led mixed uses scheme</th>
<th>Option 3 Housing led mixed uses scheme</th>
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<tbody>
<tr>
<td>1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings</td>
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<tr>
<td>2. Reduce crime and the fear of crime</td>
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<tr>
<td>3. Improve standard of health and wellbeing of those who live and work in the Borough</td>
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<td>23. Maintain stable levels of employment in the Borough</td>
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</table>

**Summary**

(1) has the provision of a mixed used retail scheme which fits perfectly with the site being located in the designated ‘Leisure and Entertainment Hub.’ There will be an improvement on the currently vacant site, as well as the ability to restore a listed building. It should attract visitors and also create jobs and generally increase the vitality of the town centre. It will provide excellent access to community facilities and recreational amenities.

(2) would also enable the restoration of a listed building and increase the provision for community facilities. There would be no economic boost to the area however and doesn’t support the ‘Leisure and Entertainment Hub.’

(3) similarly doesn’t support ‘The Hub’ and it will reduce economic activity in the centre. Whilst being positive in meeting housing targets and developing vacant sites, housing wouldn’t contribute in other factors which are more fitting to designated leisure area.
APPENDIX XXIV: ALTERNATIVES APPRAISAL (HSBC SITE SITE)

Introduction
As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising the following alternative approaches to developing the HSBC Site:

1) Leisure/cultural/restaurant led mixed use scheme with residential
2) Retail led mixed uses scheme
3) Housing led mixed uses scheme

The interim appraisal findings are presented in full within this Appendix. The appraisal table should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Proposed Submission AAP.

Methodology
See Appendix II, above

Appraisal findings

<table>
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<th>Sustainability Objective</th>
<th>Option 1 Leisure/cultural/restaurant led mixed use scheme with residential</th>
<th>Option 2 Retail led mixed uses scheme</th>
<th>Option 3 Housing led mixed uses scheme</th>
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</thead>
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<td>2. Reduce crime and the fear of crime</td>
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<td>23. Maintain stable levels of employment in the Borough</td>
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</tbody>
</table>

**Summary**

1. Actively promotes the ‘Leisure and Entertainment Hub’ in which the site is located, being able to provide jobs, footfall, recreation and new facilities to the area. There is also a provision for housing enabling a contribution towards targets.

2. Introduces the retail floorspace which can help support jobs and improve economic activity. Although this is positive, the ‘Leisure’ designation of the area in the AAP would have fewer visitors than envisaged and therefore reduced economic activity.

3. Provides housing intensifying the current use of the site but doesn’t add to the footfall or economic activity of the area.
APPENDIX XXV: ALTERNATIVES APPRAISAL (ARCADE SITE SITE)

Introduction
As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising the following alternative approaches to developing the Arcade Site Site:

1) Housing led mixed use development including leisure, retail and restaurant uses
2) Housing
3) Housing led mixed use scheme including retail

The interim appraisal findings are presented in full within this Appendix. The appraisal table should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Proposed Submission AAP.

Methodology
See Appendix II, above

Appraisal findings

<table>
<thead>
<tr>
<th>Sustainability Objective</th>
<th>Option 1 Housing led mixed use development including leisure, retail and restaurant uses</th>
<th>Option 2 Housing</th>
<th>Option 3 Housing led mixed use scheme including retail</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings</td>
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<tr>
<td>9. Reduce production of waste and increase recycling</td>
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</tbody>
</table>
### Summary

1. Actively promotes the ‘Leisure and Entertainment Hub’ in which the site is located, being able to provide jobs, footfall, recreation and new facilities to the area. There is also a provision for housing enabling a contribution towards targets.
2. Is a pure housing option which would not provide any employment or investment opportunities.
3. Includes housing and retail which is good for jobs but does not fit in with the ‘Leisure Hub’ designation. All three options are to be built on currently public open space.
Introduction
As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising the following alternative approaches to developing the Town Square and Gardens Site:

1) Accommodation an extension to Selborne Walk shopping centre and improvement and enhancement of the remaining open space
2) Retain green space

The interim appraisal findings are presented in full within this Appendix. The appraisal table should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Proposed Submission AAP.

Methodology
See Appendix II, above

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<th>Option 2</th>
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<td>10.</td>
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<td>17.</td>
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<td>18.</td>
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</tr>
<tr>
<td>19.</td>
<td>Maintain and enhance the quality of the green belt and open space areas.</td>
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<td>21.</td>
<td>Maintain and enhance the vitality and viability of the Borough’s town centres</td>
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<td>22.</td>
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</tr>
<tr>
<td>23.</td>
<td>Maintain stable levels of employment in the Borough</td>
<td>~</td>
</tr>
</tbody>
</table>

**Summary**

(1) offers a significant investment into the quality of the surroundings and as a result enhances the quality of the open space. Clearer pathways can increase footfall to the town centre and reduce the fear of crime. Opening and extending the gardens also provides improved recreational amenity as well opening up areas for retail expansion, again improving activity in the town centre.

(2) retains the current biodiversity and green space. The viability and vitality of the town centre is lost though as it currently stands with no coherent character or definition for visitors and locals alike.
APPENDIX XXVII: ALTERNATIVES APPRAISAL (SELBORNE WALK SHOPPING CENTRE SITE)

Introduction
As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising the following alternative approaches to developing the Selborne Walk Shopping Centre Site:
1) Retail led extension(s) with housing on the upper floors
2) Not retail extension, but inclusion of housing
3) No retail extension

The interim appraisal findings are presented in full within this Appendix. The appraisal table should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Proposed Submission AAP.

Methodology
See Appendix II, above

Appraisal findings

<table>
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<tr>
<th>Sustainability Objective</th>
<th>Option 1 Retail led extension(s) with housing on the upper floors</th>
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</tr>
</thead>
<tbody>
<tr>
<td>1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings</td>
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<td>19. Maintain and enhance the quality of the green belt and open space areas.</td>
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</tr>
</tbody>
</table>

**Summary**

(1) provides an increase in retail floorspace which will help provide a boost to the town centre in terms of jobs and potential new investors. The aim is for ‘high end’ shops, improving the current offering. There is a housing provision on upper floors contributing to targets, as well as an increased likelihood of footfall with the remodelling of open space. There is the potential to generate excess waste due to the scale and nature of the development.

(2) includes housing which will contribute to the provision in the town centre however it does not include employment or investment opportunities with the exemption of the retail extension. Green space will be maintained.

(3) offers similar green space maintenance however it doesn’t offer housing nor retail floorspace therefore doesn’t include any inward investment to the centre.
APPENDIX XXVIII: ALTERNATIVES APPRAISAL (STATION CAR PARK SITE)

Introduction
As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising the following alternative approaches to developing the Station Car Park Site:

1) Housing
2) Retail led mixed use including housing
3) Housing led mixed use including retail

The interim appraisal findings are presented in full within this Appendix. The appraisal table should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Proposed Submission AAP.

Methodology
See Appendix II, above

Appraisal findings

<table>
<thead>
<tr>
<th>Sustainability Objective</th>
<th>Option 1 Housing</th>
<th>Option 2 Retail led mixed use including housing</th>
<th>Option 3 Housing led mixed use including retail</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings</td>
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<td>+</td>
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<td>2. Reduce crime and the fear of crime</td>
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</tbody>
</table>

**Summary**

1. Provides a significant number of new houses to within the AAP boundary. It will redevelop an existing under utilised site and provide a number of new residents in close proximity to the town centre.

2. Chooses to lead with retail which falls out of the primary shopping core and as a result would have a negative impact on the town centre reducing footfall/activity. The provision of new houses though will contribute to targets within the AAP boundary and there will be employment opportunities.

3. Similarly has a retail element albeit not as large. This would result in fewer jobs than option (2) and not as many houses as option (1).
APPENDIX IXXX: ALTERNATIVES APPRAISAL (SAINSBURY’S SITE)

Introduction
As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising the following alternative approaches to developing the Sainsbury’s Site:

1) Retail led mixed use scheme with residential and social Infrastructure
2) Retail

The interim appraisal findings are presented in full within this Appendix. The appraisal table should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Proposed Submission AAP.

Methodology
See Appendix II, above

Appraisal findings

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</tbody>
</table>

**Summary**

(1) improves the vitality and viability of the town centre with the introduction of retail housing and social infrastructure. There are employment opportunities along with the housing contributions as well as providing community facilities intensifying the site. Footfall and activity is likely to increase attracting new shoppers to the area.

(2) will also boost shoppers and visitors and redevelopment will improve safety and security for shoppers with the increased footfall. There is no social infrastructure provision however and the social club will be lost.
APPENDIX XXX: ALTERNATIVES APPRAISAL (OSBORNE MEWS SITE)

Introduction
As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising the following alternative approaches to developing the Osborne Mews Site:

1) Housing
2) Housing led mixed uses scheme including retail
3) Housing led mixed uses scheme including commercial

The interim appraisal findings are presented in full within this Appendix. The appraisal table should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Proposed Submission AAP.

Methodology
See Appendix II, above

Appraisal findings

<table>
<thead>
<tr>
<th>Sustainability Objective</th>
<th>Option 1 (Housing)</th>
<th>Option 2 (Housing led mixed uses scheme including retail)</th>
<th>Option 3 (Housing led mixed uses scheme including commercial)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings</td>
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<td>7. Reduce the overall level of deprivation</td>
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<td>8. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system</td>
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<td>9. Reduce production of waste and increase recycling</td>
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<td>10. Reduce greenhouse gas emissions</td>
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<td>12. Improve air quality through a reduction in traffic-based emissions</td>
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<td>13. Improve water quality and ensure the efficient use of water resources</td>
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<td>18. Protect the ecological integrity of Natura 2000 sites</td>
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<td>20. Conserve and, where appropriate, enhance the historic environment</td>
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<td>22. Improve the local economy by attracting inward investment</td>
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<tr>
<td>23. Maintain stable levels of employment in the Borough</td>
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</tbody>
</table>

**Summary**

(1) proposes a pure housing development which will help increase the number in the AAP boundary intensifying its current use.

Re. (2) - with the site only being small it means any retail offering would not necessarily bring stable levels of jobs, they are also on the opposite side to existing retail floorspace. It does not provide as many houses as option (1), but it does provide them nonetheless and intensifies current usage.

(3) similarly provides houses and intensifies current usage but again any commercial use offering would not necessarily bring stable levels of jobs, and it does not provide as many houses as option (1).
APPENDIX XXXI: ALTERNATIVES APPRAISAL (BUXTON ROAD BINGO HALL SITE)

Introduction
As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising the following alternative approaches to developing the Buxton Road Bingo Hall Site:
1) Housing-led mixed use scheme with commercial
2) Leisure led mixed use scheme
3) Housing led mixed use scheme including social infrastructure

The interim appraisal findings are presented in full within this Appendix. The appraisal table should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Proposed Submission AAP.

Methodology
See Appendix II, above

Appraisal findings

<table>
<thead>
<tr>
<th>Sustainability Objective</th>
<th>Option 1 Housing-led mixed use scheme with commercial</th>
<th>Option 2 Leisure led mixed use scheme</th>
<th>Option 3 Housing led mixed use scheme including social infrastructure</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings</td>
<td>+</td>
<td>~</td>
<td>+</td>
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<tr>
<td>2. Reduce crime and the fear of crime</td>
<td>+</td>
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<tr>
<td>3. Improve standard of health and wellbeing of those who live and work in the Borough</td>
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<tr>
<td>4. Increase the provision of and access to community facilities to meet local cultural, recreational and social needs</td>
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<tr>
<td>5. Improve educational attainment in schools</td>
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<tr>
<td>6. Improve opportunities for access to education and training for all residents</td>
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<tr>
<td>7. Reduce the overall level of deprivation</td>
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<tr>
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<td>15. Reduce contamination and safeguard soil quality and quantity</td>
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<tr>
<td>16. Make the best use of previously developed land (PDL) and existing buildings</td>
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<td>18. Protect the ecological integrity of Natura 2000 sites</td>
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<td>19. Maintain and enhance the quality of the green belt and open space areas.</td>
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<tr>
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<tr>
<td>22. Improve the local economy by attracting inward investment</td>
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</tr>
<tr>
<td>23. Maintain stable levels of employment in the Borough</td>
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</tr>
</tbody>
</table>

**Summary**

(1) intensifies the use of the currently vacant site. By adding housing it helps produce new homes for people within the AAP boundary and commercial space can provide jobs and attract further investment to the Borough.

(2) again intensifies the usage and introduces a leisure centre although the site does not fall in the ‘Leisure and Entertainment Hub’ which could detract from that designated area. There is also no provision for new houses.

(3) introduces residential and social infrastructure, improving local access to services and contributing to new homes within the AAP boundary. There is no provision for employment or inward investment.
APPENDIX XXXII: ALTERNATIVES APPRAISAL (8 BUXTON ROAD SITE)

Introduction
As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising the following alternative approaches to developing the 8 Buxton Road Site:

1) Social Infrastructure
2) Retail
3) Housing

The interim appraisal findings are presented in full within this Appendix. The appraisal table should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Proposed Submission AAP.

Methodology
See Appendix II, above

Appraisal findings

<table>
<thead>
<tr>
<th>Sustainability Objective</th>
<th>Option 1 Social Infrastructure</th>
<th>Option 2 Retail</th>
<th>Option 3 Housing</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings</td>
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<td>+</td>
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<tr>
<td>2. Reduce crime and the fear of crime</td>
<td>+</td>
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<tr>
<td>3. Improve standard of health and wellbeing of those who live and work in the Borough</td>
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</tr>
<tr>
<td>4. Increase the provision of and access to community facilities to meet local cultural, recreational and social needs</td>
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<tr>
<td>5. Improve educational attainment in schools</td>
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<tr>
<td>6. Improve opportunities for access to education and training for all residents</td>
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<tr>
<td>7. Reduce the overall level of deprivation</td>
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<tr>
<td>8. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system</td>
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<tr>
<td>9. Reduce production of waste and increase recycling</td>
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<td>10. Reduce greenhouse gas emissions</td>
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<td>11. Conserve energy</td>
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<tr>
<td>12. Improve air quality through a reduction in traffic-based emissions</td>
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<td>13. Improve water quality and ensure the efficient use of water</td>
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<tr>
<td>14. Reduce the risk of flooding</td>
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<td>15. Reduce contamination and safeguard soil quality and quantity</td>
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<tr>
<td>16. Make the best use of previously developed land (PDL) and existing buildings</td>
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<tr>
<td>17. Conserve and enhance biodiversity</td>
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<tr>
<td>23. Maintain stable levels of employment in the Borough</td>
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</table>

**Summary**

1. proposes new education social infrastructure providing an extension to the currently vacant school. Intensifying and reusing the building will make best use of the land and will help to increase educational attainment.

2. introduces retail however being located away from the main retail frontages results in it possibly creating problems for the centre with reduced footfall/activity. This also is the reason why there may not be stable jobs as a result with the trade likely to be affected by its location.

3. would provide good housing numbers within the AAP boundary. It would reuse a vacant site although doesn’t help support the need for education facilities in the Borough.
APPENDIX XXXIII: ALTERNATIVES APPRAISAL (SOUTH GROVE SITE)

Introduction
As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising the following alternative approaches to developing the South Grove Site:

1) Retail led mixed use scheme including residential
2) Residential led mixed uses scheme

The interim appraisal findings are presented in full within this Appendix. The appraisal table should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Proposed Submission AAP.

Methodology
See Appendix II, above

Appraisal findings

<table>
<thead>
<tr>
<th>Sustainability Objective</th>
<th>Option 1 Retail led mixed use scheme including residential</th>
<th>Option 2 Residential led mixed uses scheme</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings</td>
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<tr>
<td>2. Reduce crime and the fear of crime</td>
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<td>3. Improve standard of health and wellbeing of those who live and work in the Borough</td>
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<td>7. Reduce the overall level of deprivation</td>
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<tr>
<td>23. Maintain stable levels of employment in the Borough</td>
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</tbody>
</table>

**Summary**

(1) leads with retail offering large investment onto a currently under utilised space. It will help the viability of the town centre as well as providing jobs and investment opportunities. Both the options build on the car park site which would increase the need for people to use public transport to access the centre with less space for car parking, reducing the dependence on cars.

(2) proposes a large contribution of houses within the AAP boundary, reducing overall deprivation and intensifying the current land use. There would be no opportunity for employment or inward investment however.
APPENDIX XXXIV: ALTERNATIVES APPRAISAL (BRUNNER ROAD INDUSTRIAL UNITS SITE)

Introduction
As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising the following alternative approaches to developing the Brunner Road Industrial Units Site:

1) A mixed use development including retail, commercial, social infrastructure and residential uses
2) Housing led mixed uses scheme including commercial

The interim appraisal findings are presented in full within this Appendix. The appraisal table should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Proposed Submission AAP.

Methodology
See Appendix II, above

Appraisal findings

<table>
<thead>
<tr>
<th>Sustainability Objective</th>
<th>Option 1</th>
<th>Option 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings</td>
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</tr>
<tr>
<td>2. Reduce crime and the fear of crime</td>
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<td>3. Improve standard of health and wellbeing of those who live and work in the Borough</td>
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<td>4. Increase the provision of and access to community facilities to meet local cultural, recreational and social needs</td>
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</tr>
<tr>
<td>5. Improve educational attainment in schools</td>
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</tr>
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<tr>
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<tr>
<td>8. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system</td>
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<td>9. Reduce production of waste and increase recycling</td>
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<td>10. Reduce greenhouse gas emissions</td>
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<tr>
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<tr>
<td>22. Improve the local economy by attracting inward investment</td>
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<tr>
<td>23. Maintain stable levels of employment in the Borough</td>
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</tbody>
</table>

**Summary**

Intensifying the current vacant use with a mixture of retail and housing along with social infrastructure (1) will give a good balance to AAP housing, employment and facility aims. There would be an increase in economic activity and footfall to the area.

(2) limits the potential commercial space though reducing the possibility of more employment. There is a huge boost to housing though and the fear of crime will be improved by (both options) with the renovation of a derelict vacant site.
APPENDIX XXXV: ALTERNATIVES APPRAISAL (ST JAMES STREET CAR PARK SITE)

Introduction
As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising the following alternative approaches to developing the St James Street Car Park Site:

1) Residential led mixed use including retail and or restaurant uses and or social infrastructure
2) Housing

The interim appraisal findings are presented in full within this Appendix. The appraisal table should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Proposed Submission AAP.

Methodology
See Appendix II, above

Appraisal findings

<table>
<thead>
<tr>
<th>Sustainability Objective</th>
<th>Option 1 Residential led mixed use including retail and or restaurant uses and or social infrastructure</th>
<th>Option 2 Housing</th>
</tr>
</thead>
<tbody>
<tr>
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<td>17. Conserve and enhance biodiversity</td>
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<td>18. Protect the ecological integrity of Natura 2000 sites</td>
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<td>22. Improve the local economy by attracting inward investment</td>
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<tr>
<td>23. Maintain stable levels of employment in the Borough</td>
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**Summary**

(1) allows for mixed use opportunities contributing to employment, housing and social infrastructure within the AAP boundary. The fear of crime will reduce with the regeneration of a vacant site as well as social needs with new facilities including restaurants.

(2) will boost the housing numbers and help regenerate the currently vacant car park. Intensifying the use will improve the area, although opportunities in retail leisure are not taken.
APPENDIX XXXVI: ALTERNATIVES APPRAISAL (ST JAMES STREET HEALTH CENTRE SITE)

Introduction
As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising the following alternative approaches to developing the Snooker Hall Site:

1) Social infrastructure (health) led mixed use including residential
2) Housing led mixed uses scheme including retail

The interim appraisal findings are presented in full within this Appendix. The appraisal table should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Proposed Submission AAP.

Methodology
See Appendix II, above

Appraisal findings

<table>
<thead>
<tr>
<th>Sustainability Objective</th>
<th>Option 1</th>
<th>Option 2</th>
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23. Maintain stable levels of employment in the Borough | ~ | ~

**Summary**

(1) proposes an improvement and enhancement of the social infrastructure (health). It is coupled with residential development contributing to homes within the AAP boundary. It will improve the standard of health and wellbeing to those in the Borough.

(2) intensifying the current site for residential development will help contribute to housing targets. The loss of the health facility however would be to the detriment of local people.