



SA of the Wood Street Area Action Plan

SA Report

August 2013

Prepared for:
London Borough of
Waltham Forest

UNITED
KINGDOM &
IRELAND



REVISION SCHEDULE					
Rev	Date	Details	Prepared by	Reviewed by	Approved by
1	March 2013	SA Report published for consultation alongside the Wood Street AAP 'Preferred Options' document	Sophie Corbett Senior Consultant Chris Eves Assistant Consultant	Mark Fessey Senior Consultant	Steve Smith Associate
2	August 2013	Revised SA Report following client comment published for consultation alongside the Wood Street AAP 'Preferred Options' document	Sophie Corbett Senior Consultant Chris Eves Assistant Consultant	Mark Fessey Senior Consultant	Steve Smith Associate

Limitations

URS Infrastructure & Environment UK Limited (“URS”) has prepared this Report for the use of Waltham Forest Borough Council (“the Client”) in accordance with the Agreement under which our services were performed. No other warranty, expressed or implied, is made as to the professional advice included in this Report or any other services provided by URS.

The conclusions and recommendations contained in this Report are based upon information provided by others and upon the assumption that all relevant information has been provided by those parties from whom it has been requested and that such information is accurate. Information obtained by URS has not been independently verified by URS, unless otherwise stated in the Report.

The methodology adopted and the sources of information used by URS in providing its services are outlined in this Report. The work described in this Report was undertaken in 2012 and is based on the conditions encountered and the information available during the said period of time. The scope of this Report and the services are accordingly factually limited by these circumstances.

URS disclaim any undertaking or obligation to advise any person of any change in any matter affecting the Report, which may come or be brought to URS’ attention after the date of the Report.

Certain statements made in the Report that are not historical facts may constitute estimates, projections or other forward-looking statements and even though they are based on reasonable assumptions as of the date of the Report, such forward-looking statements by their nature involve risks and uncertainties that could cause actual results to differ materially from the results predicted. URS specifically does not guarantee or warrant any estimate or projections contained in this Report.

Copyright

© This Report is the copyright of URS Infrastructure & Environment UK Limited.

URS Infrastructure and Environment UK Limited
6-8 Greencoat Place
London, SW1P 1PL
Telephone: +44(0)20 7798 5000
Fax: +44(0)20 7798 5001

TABLE OF CONTENTS

INTRODUCTION.....1

1 BACKGROUND2

2 SA EXPLAINED2

3 STRUCTURE OF THIS SA REPORT2

PART 1: WHAT’S THE SCOPE OF THE SA?4

4 INTRODUCTION (TO PART 1).....5

5 WHAT IS THE PLAN SEEKING TO ACHIEVE?.....6

6 WHAT’S THE SUSTAINABILITY ‘CONTEXT’?.....7

7 WHAT’S THE SUSTAINABILITY ‘BASELINE’ AT THE CURRENT TIME?11

8 WHAT’S THE BASELINE PROJECTION?15

9 WHAT ARE THE KEY ISSUES THAT SHOULD BE A FOCUS OF THE APPRAISAL?.....16

PART 2: WHAT HAS PLAN-MAKING / SA INVOLVED UP TO THIS POINT?.....18

10 INTRODUCTION (TO PART 2).....19

11 ALTERNATIVE APPROACHES TO ADDRESSING AREA-WIDE POLICY ISSUES19

12 ALTERNATIVE APPROACHES TO DEVELOPING ‘OPPORTUNITY SITES’28

PART 3: WHAT ARE THE APPRAISAL FINDINGS AND RECOMMENDATIONS AT THIS CURRENT STAGE?38

13 INTRODUCTION (TO PART 3).....39

14 APPRAISAL OF THE DRAFT (PREFERRED OPTIONS) AAP.....39

15 CONCLUSIONS AT THIS CURRENT STAGE.....70

16 RECOMMENDATIONS AT THIS CURRENT STAGE.....72

PART 4: WHAT ARE THE NEXT STEPS (INCLUDING MONITORING)?.....73

17 INTRODUCTION (TO PART 4).....74

18 PLAN FINALISATION, ADOPTION AND MONITORING74

APPENDIX I: REGULATORY REQUIREMENTS75

APPENDIX II: ALTERNATIVES APPRAISAL (SPATIAL GROWTH)78

APPENDIX III: ALTERNATIVES APPRAISAL (TOWN CENTRE SHOPPING)90

APPENDIX IV: ALTERNATIVES APPRAISAL (PLACEMAKING/DESIGN)99

APPENDIX V: ALTERNATIVES APPRAISAL (HOUSING GROWTH).....108

APPENDIX VI: ALTERNATIVES APPRAISAL (AFFORDABLE HOMES).....118

APPENDIX VII: ALTERNATIVES APPRAISAL (CONNECTIONS)126

APPENDIX VIII: ALTERNATIVES APPRAISAL (SUSTAINABILITY AND ENERGY).....133

APPENDIX IX: ALTERNATIVES APPRAISAL (OPEN SPACE)139

APPENDIX X: ALTERNATIVES APPRAISAL (EMPLOYMENT ON WOOD STREET)147

APPENDIX XI: ALTERNATIVES APPRAISAL (CEDAR WOOD HOUSE).....155

APPENDIX XII: ALTERNATIVES APPRAISAL (GOSS COMPONENTS).....162

APPENDIX III: ALTERNATIVES APPRAISAL (WALTHAMSTOW BUSINESS CENTRE)	169
APPENDIX XIV: ALTERNATIVES APPRAISAL (ARDLEIGH WORKS).....	176
APPENDIX XV: ALTERNATIVES APPRAISAL (STERLING HOUSE)	183
APPENDIX XVI: ALTERNATIVES APPRAISAL (WILLOW HOUSE).....	191
APPENDIX XVII: ALTERNATIVES APPRAISAL (WOOD STREET CORNER).....	199
APPENDIX XVIII: ALTERNATIVES APPRAISAL (MARLOWE ROAD ESTATE).....	206
APPENDIX XIX: ALTERNATIVES APPRAISAL (BRANDON ROAD CAR PARK)	214
APPENDIX XX: ALTERNATIVES APPRAISAL (WOODSIDE SCHOOL CAR PARK (BRIDGE SITE))	221
APPENDIX XXI: ALTERNATIVES APPRAISAL (SCOUT HALL AND CHURCH (FORMER FACTORY))	228
APPENDIX XXII: ALTERNATIVES APPRAISAL (DAIRY SITE)	235
APPENDIX XXIII: ALTERNATIVES APPRAISAL (CROWNLEA SITE)	242
APPENDIX XXIV: ALTERNATIVES APPRAISAL (LUCERNE).....	250

INTRODUCTION

1 BACKGROUND

- 1.1.1 URS is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Wood Street 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
- 1.1.2 At the current time the Council is consulting a 'Preferred Options' version of the Plan, which for all intents and purposes is a 'draft' version of the plan.

2 SA EXPLAINED

- 2.1.1 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.

3 STRUCTURE OF THIS SA REPORT

- 3.1.1 The four SA questions are answered in turn across the four subsequent parts of this Report.
- 3.1.2 Table 1.1 overleaf presents the questions that must be answered within the SA Report. Appendix I of this SA Report explains in greater detail the process of 'making the links' to the requirements of the Regulations.

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

SA REPORT QUESTION	SUB-QUESTION	CORRESPONDING REQUIREMENT (THE REPORT MUST INCLUDE...)
What's the scope of the SA?	What's the Plan seeking to achieve?	<ul style="list-style-type: none"> An outline of the contents and main objectives of the plan
	What's the sustainability 'context'?	<ul style="list-style-type: none"> The relationship of the plan with other relevant plans and programmes The relevant environmental protection objectives, established at international or national level
	What's the sustainability 'baseline' at the current time?	<ul style="list-style-type: none"> The relevant aspects of the current state of the environment The environmental characteristics of areas likely to be significantly affected
	What's the baseline projection?	<ul style="list-style-type: none"> The likely evolution of the current state of the environment without implementation of the plan
	What are the key issues that should be a focus of SA?	<ul style="list-style-type: none"> Any existing environmental problems / issues which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance
What has Plan-making / SA involved up to this point?		<ul style="list-style-type: none"> An outline of the reasons for selecting the alternatives dealt with (and thus an explanation of why the alternatives dealt with are 'reasonable') 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.
What are the appraisal findings at this current stage?		<ul style="list-style-type: none"> The likely significant effects on the environment associated with the draft plan The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan
What happens next (including monitoring)?		<ul style="list-style-type: none"> A description of the measures envisaged concerning monitoring

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 Regulations⁴, this Chapter answers the series of questions below.

Table 4.1: Scoping questions answered

SCOPING QUESTION	CORRESPONDING REQUIREMENT (THE REPORT MUST INCLUDE...)
What's the Plan seeking to achieve?	<ul style="list-style-type: none"> An outline of the contents, main objectives of the plan'
What's the sustainability 'context'?	<ul style="list-style-type: none"> The relationship of the plan with other relevant plans and programmes' The relevant environmental protection objectives, established at international or national level
What's the sustainability 'baseline' at the current time?	<ul style="list-style-type: none"> The relevant aspects of the current state of the environment The environmental characteristics of areas likely to be significantly affected
What's the baseline projection?	<ul style="list-style-type: none"> The likely evolution of the current state of the environment without implementation of the plan'
What are the key issues that should be a focus of SA?	<ul style="list-style-type: none"> Any existing environmental problems / issues which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance

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.⁵ 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>

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 programme'.

5 WHAT IS THE PLAN SEEKING TO ACHIEVE?

The SA Report must include...

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

Objectives of the Area Action Plan

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

- To take a balanced approach to growth and achieve our growth targets whilst protecting the special character of Wood Street
- To create an accessible, distinctive and vibrant town centre at Wood Street which is well connected into the surrounding neighbourhood; and which has an appropriate mix of uses including a range of shops, restaurants, and facilities to support housing growth.
- To provide a framework to coordinate change across a number of sites and over the plan period in a holistic manner to ensure that new development is of a high standard of design and that the character of the area is protected and improved where appropriate, to maximise benefits for the area as a whole.
- To provide a range of affordable, high quality, sustainable homes that address a variety of local needs and to redevelop the existing Marlowe Road Estate buildings with a housing development that sets high standards of design, quality and sustainability for the lifetime of this programme.
- To improve accessibility of the town centre and connections to adjacent housing areas and neighbourhoods and to encourage the use of more sustainable transport whilst balancing the various modal requirements in a complex town centre location.
- To support the long term sustainability of our environment and respond to climate change in a practical and effective way through decentralised energy and district heating.
- To protect, enhance and develop the network of green infrastructure within the plan area and to improve access to open spaces and nature within and adjacent to the plan area, in particular Epping Forest.
- To promote and create local employment opportunities for residents and to help the town centre to prosper.
- To provide a wide range of high quality, integrated facilities and services that support growth and respond to the local needs of a wide range of groups and individuals and contribute towards strengthening the 'community spirit'.
- To promote development which provides safe and legible layouts, including active building frontages and well-connected and safe pedestrian routes.
- To support creativity, culture, and the art community to facilitate the contributions that the cultural sector can make towards the town centre economy and towards shaping the character, identity and urban life of Wood Street.

5.2 What's the plan not seeking 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'?

The SA Report must include...

- The relationship of the plan with other relevant plans and programmes
- The relevant environmental protection objectives, established at international or national level

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 Framework⁶

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.

⁶ CLG (2012) National Planning Policy Framework [online] available at: <http://www.communities.gov.uk/documents/planningandbuilding/pdf/2116950.pdf> (accessed 08/2012)

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 2008⁷. 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

- 6.2.9 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

- 6.2.10 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

- 6.2.11 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

- 6.2.12 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

- 6.2.13 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.
- 6.2.14 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

- 6.2.15 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

- 6.2.16 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.

The London Plan: A spatial development strategy for Greater London (2011)

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) which is located on the edge of the Wood Street AAP area.

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 In terms of locally important nature conservation sites, there are three Sites of Local Importance to Nature Conservation that are in close proximity to the Wood Street AAP area. These sites, which vary in quality, are:

- Greenway Avenue
- Bistern Avenue Park
- Site along the railway corridor

7.1.7 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

- 7.1.8 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

- 7.1.9 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.
- 7.1.10 At the ward level, five out of the eight neighbourhoods in Wood Street are among the 20% of most deprived in England including one in the north of Wood Street which is among the 5% most deprived⁸. Although two out of the seven neighbourhoods in Chapel End ward are among the 20% of most deprived in England, these are not located within the Wood Street AAP boundary area⁹.
- 7.1.11 In terms of crime at the ward level, in 2011 both Wood Street (212)¹⁰ and Chapel End (193)¹¹ had a slightly lower number of notifiable offences per 1,000 residents compared to the Borough average (213).

Cultural heritage

- 7.1.12 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 has produced a 'local list' of buildings, which do not have the same statutory protection, but which the Council will seek to conserve and enhance as much as possible; there are 141 Locally Listed Buildings.
- 7.1.13 In the Wood Street AAP area there are four listed buildings; of which one is Grade 2* listed and three are Grade 2 listed¹². The Listed Buildings are:
- Walthamstow House (Corpus Christi School) (Grade 2*)
 - Thorpe Coombe Hospital
 - Clock House
 - The Old Butchers Shop
- 7.1.14 There are 11 Conservation Areas in Waltham Forest, though none are located within the Wood Street AAP area. The designated Conservation Areas are:
- The Green, Chingford
 - Ropers Avenue/Inks Green, Highams Park
 - Woodford Green
 - Leucha Road, Walthamstow
 - Walthamstow St. James

⁸ Wood Street Ward Profile (2011) <http://www.walthamforest.gov.uk/pages/services/statistics-economic-information-and-analysis.aspx>

⁹ Chapel End Ward Profile (2011) <http://www.walthamforest.gov.uk/pages/services/statistics-economic-information-and-analysis.aspx>

¹⁰ Wood Street Ward Profile (2011) <http://www.walthamforest.gov.uk/pages/services/statistics-economic-information-and-analysis.aspx>

¹¹ Chapel End Ward Profile (2011) <http://www.walthamforest.gov.uk/pages/services/statistics-economic-information-and-analysis.aspx>

¹² English Heritage (2013) <http://list.english-heritage.org.uk/mapsearch.aspx>

- 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

7.1.15 These areas have been identified as making an important contribution to local distinctiveness and historic character.

Economy & employment

7.1.16 70.5% of Wood Street residents are economically active (March 2011). This figure is marginally lower compared to the Waltham Forest average (70.7%) and the London average (71.7%)¹³

7.1.17 The three main employment sectors in Wood Street are public administration, education and health (48%); distribution, hotels and restaurants (19%) and banking, finance and insurance (17%)¹⁴.

7.1.18 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%)¹⁵.

Education

7.1.19 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 above¹⁶.

7.1.20 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 however¹⁷.

Housing

7.1.21 In 2011, approximately 68% of households in Wood Street live in dwellings that are in private sector ownership (owner occupied or private rented), with 31% of households living in social housing, and 1% of households living rent free. About 22% of households live in rented social housing that belongs to the local authority.

7.1.22 Between 2004 and 2009 home ownership fell from 60% to 49% in Waltham Forest¹⁸.

7.1.23 Between February 2012 and July 2012 the average house price in Wood Street was £299,638, which was higher than the Borough's average house price over the same time period (£249,267). This is an increase of about 25% on the 2008 figure for Wood Street, which was £241,730¹⁹.

¹³ ONS Neighbourhood Statistics (2011)

¹⁴ Business Register and Employment Survey 2009

¹⁵ Business Demography ONS (2010)

¹⁶ Nomis web ONS (2012)

¹⁷ Department for Education Performance Tables 2011

¹⁸ GLA, / 2011 Waltham Forest Housing Needs survey and Strategic Housing market assessment

¹⁹ GLA Ward Profiles (2012) <http://data.london.gov.uk/visualisations/atlas/ward-profiles-summary/atlas.html>

Landscape and townscape

- 7.1.24 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 315 hectares 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.
- 7.1.25 The Wood Street AAP area benefits from good access to nature and open space with a number of open spaces in its proximity, with Epping Forest the most notable. The Council's Open Space Strategy²⁰ (2010) identified Wood Street as having approximately 51 hectares of unrestricted access open space, which equates to about 27% of the ward area.
- 7.1.26 In terms of the built environment Waltham Forest comprises several 'Conservation Areas' (see discussion above under 'Cultural Heritage').

Transport and accessibility

- 7.1.27 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.
- 7.1.28 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.
- 7.1.29 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.

²⁰ Waltham Forest Council (2010) Open Space Strategy: 2010-2020 Available from: <http://www.walthamforest.gov.uk/Documents/open-spaces-strategy-september2010.pdf>

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:²¹

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

²¹ 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 disparity could affect the 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 Preferred Options Consultation Document.
 - As an interim plan-making / SA step there was an appraisal of **alternative approaches to developing 'Development Sites'**;
 - And how the Council then took account of these interim SA findings when preparing the Preferred Options Consultation Document.

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:

- | | |
|------------------------|-----------------------------|
| • Spatial growth | • Sustainability and energy |
| • Town centre shopping | • Open space |
| • Placemaking/Design | • Employment on Wood Street |
| • Housing Growth | |
| • Affordable housing | |
| • Connections | |

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 Preferred Options Consultation Document.

11.2 Spatial growth

Alternative options considered

1. A balanced approach - encourages growth at a number of sites across the AAP area, whilst recognising the need to strengthen the town centre by consolidating town centre uses and activities.
2. Dispersed growth - focuses growth at the locations where redevelopment opportunities exist, with these opportunity sites to be redeveloped for a range of uses as primarily determined by market considerations.
3. Town centre focused growth.

Summary of appraisal findings

11.2.1 Of the alternative options put forward, **Option One**, with its balanced approach to redevelopment, is clearly the strongest performing. In economic terms, it is expected to produce a number of **significant positive effects** (reducing deprivation, encouraging town

centre vitality and viability, attracting inward investment and maintaining high levels of employment). These significant effects, and the other high scores achieved by this option, are as a result of its flexible, yet managed approach of planned intervention, which will be capable of producing and exploiting a wide range of synergies in a positive manner (in location, density, infrastructure, and facilities).

11.2.2 This is in contrast to the approaches set out in **Options Two** (unfocused and market-led) and **Three** (narrowly focused on concentrating commercial and residential uses), which are less likely to take advantage of the full suite of opportunities for social, environmental and economic gains in the Wood Street area. In fact, these approaches may lead to some **significant negative effects** against the baseline. Specifically, these are **Option Two's** likely failure to produce a pattern of development that supports sustainable transport infrastructure and associated reductions in road traffic emissions; and the potential effect of **Option Three's** concentration of employment use on open space quality and provision in the town centre area

11.2.3 **Appendix II** presents appraisal findings in full.

[The Council's preferred approach](#)

11.2.4 The council's preferred option is for a balanced approach to growth, which encourages growth at a number of sites across the plan area, whilst recognising the need to strengthen the town centre by consolidating town centre uses and activities.

11.2.5 Key aspects of this option identified by the council are as follows:

- Management of employment/town centre uses/activities throughout the area to protect the long term vitality and viability of Wood Street centre, while also ensuring that shopping/town centre needs of the new communities are met,
- A flexible approach to planned intervention by optimising development opportunity such that new uses and activities to take place at the most appropriate locations and sites,
- Rationalisation of existing land uses e.g. managed release of existing employment land for alternative uses, relocation of existing uses where justified and alternative employment activities,
- Promotes synergy between the different uses and activities, taking place on dispersed sites while also ensuring better functional linkages between the different areas, and creating greater opportunities to achieve integrated development,
- Provides the opportunity to balance needs over a wider area e.g. planning for a mix of housing types and tenures throughout the area rather than in particular areas, also ensuring that the ripple effects of growth (social, economic and environmental benefits) are spread throughout the area,
- Allows growth to be distributed appropriately throughout the area taking into account the character of the different areas and development capacity as determined by site specific conditions or circumstances,
- Provides the opportunity to rationalise development plan objectives for better management of outcomes e.g. consolidating town centre uses and activities within the Wood Street town centre, while also supporting the development of new local activity hubs at appropriate locations to complement but not undermine town centre vitality and viability,
- Promotes better management of growth by making the fullest possible use of public transport, walking and cycling, also focusing significant development in the most sustainable locations.

11.3 Town centre shopping

Alternative options considered

1. Strengthen and enhance the town centre, with a clear spatial strategy to consolidate Wood Street.
2. A market-led approach to ground floor uses.

Summary of appraisal findings

- 11.3.1 Of the two approaches put forward, **Option One** is the preferred approach in all instances. The policy approach set out in this option encourages an increase in the total amount of floorspace in the town centre in order to meet the demand. In addition, it looks to provide a wider range of unit sizes in order to create a balanced mix of floorspaces, including some spaces for larger retailers. These steps are considered to lead to positive effects in terms of drawing in inward investment in the short to mid-term, with associated gains in business activity, employment and reductions in deprivation.
- 11.3.2 However, it is considered possible that **Option One** may fail to adequately protect the area's small businesses from the larger retailers that could be attracted by such steps. This may lead to an eventual decline in Wood Streets unique retail offer of specialist traders, which currently enables it to differentiate itself from neighbouring centres, with negative economic effects. As a result, **over the mid to long-term** this option is predicted to result in **significant negative effects** in terms of the vitality and viability of the town centre, levels of employment and addressing deprivation.
- 11.3.3 Nonetheless, **Option Two's** market-led approach is considered the least strong of the options put forward. This option could lead to a greater loss of small businesses in the area given the outright lack of protection it offers to such operations. This could result in a decline in the ability of Wood Street to differentiate itself from other neighbouring centres. In addition, this option fails to provide a clear spatial strategy to address Wood Street's linear nature and so could lead to areas of underinvestment and low economic activity forming, so reducing the appeal of the centre to businesses, investors and customers. **In comparison to Option One, this approach** is also considered less likely to create a continuous street life and so is likely to result in less safety from crime. It is also less likely to provide sufficient and accessible community facilities, and less likely to protect the existing character of the area. This is due to a lack of a clear strategy that targets the sensitive creation of clearly defined mixed use areas, as is set out in **Option One**.
- 11.3.4 **Appendix III** presents appraisal findings in full.
- #### The Council's preferred approach
- 11.3.5 The council aims to "consolidate town centre uses within the designated town centre boundary. Accommodation for small-scale independent retail, leisure-related uses and for cultural/creative community facilities will be particularly encouraged in the designated town centre boundary. New retail activity will be particularly focused within the designated primary frontage. In these frontages retail activity will be the dominant use in accordance with policy DM26 in the Development Management Policies DPD. In the designated secondary frontages, a mixture of uses will be permitted in accordance with policy DM26 in the Development Management Policies DPD."

11.4 Placemaking/Design

Alternative options considered

1. A comprehensive and integrated approach whereby development is required to comply with eight placemaking principles. Particular policy focus on ensuring historic assets and local heritage and any tall buildings meet specific criteria.
2. Market-led approach to regeneration of key development sites - development on key sites would occur without compliance with placemaking principles.

Summary of appraisal findings

- 11.4.1 Of the alternative options presented, the approach set out in **Option One** is likely to result in the highest level of sustainability. In particular, it may result in **significant positive effects** in terms of reducing crime and the fear of crime (through the design principles it sets out), and conserving and enhancing the historic environment (as a result of policies protective of local character and heritage assets). More generally, it is considered to be the preferable option in terms of a range of a number of social SA objectives due to the greater accessibility it is likely to provide. In addition economic gains are also predicted due to an enhanced public realm and townscape which may lead to increased inward investment, business activity, and employment; all of which may help in tackling deprivation in the Wood Street area. Environmental gains are also anticipated in terms of overall reductions in greenhouse gas emissions, air quality, and the maintenance of good quality open spaces.
- 11.4.2 **Option Two**, with its market led approach to the development of key sites, may be able to provide gains in some areas as a result of reduced restrictions on development types and patterns. These areas of benefit are housing (as a result of a greater choice of sites for developers), and energy conservation (due to increased opportunities for the construction of tall, high density developments). However, the benefits of this approach are outweighed by the disadvantages of an uncoordinated, market led approach which is more likely to miss opportunities for synergistic improvements and to neglect the wider benefits of protection.
- 11.4.3 **Appendix IV** presents appraisal findings in full.
- The Council's preferred approach**
- 11.4.4 The AAP presents an excellent opportunity to take a holistic approach to the regeneration of the whole plan area and the various potential development sites that have been identified. It can help promote the re-integration of routes and blocks back into Wood Street, strengthening frontage, and creating attractive places.”
- 11.4.5 The AAP seeks to maintain and enhance the existing character of the area through retention, sensitive renewal and refurbishment of historic and character buildings and other heritage assets and we will ensure that new development blends into the existing urban structure and character of the areas and does not negatively impact on heritage and local assets.”
- 11.4.6 New developments should achieve building heights that fit into the urban context of Wood Street. Tall buildings are not appropriate in Wood Street. However, there may be some limited circumstances where taller buildings may be appropriate, subject to the highest quality of design and meeting the criteria set out in Development Management policy DM32 and the Council's Urban Design SPD. New developments should achieve building heights that fit into the urban context of Wood Street. Tall buildings will not be allowed where they harm our heritage.

11.5 Housing Growth

Alternative options considered

1. Up to 1000 new houses to be developed over plan period.
2. Up to 650 new houses to be developed over plan period.
3. Up to 1470 new houses to be developed over the plan period.

Summary of appraisal findings

- 11.5.1 Of the approaches to housing growth presented, **Option One** is the strongest performing across all of the SA objectives considered. A key consideration was the ability of the alternative options to meet the housing needs of the area. In this respect, **Option One** is predicted to result in **significant positive effects** as a result of a density which allow sufficient scope to create homes at a density that makes the most out of the sites available, whilst not precluding the creation of family homes and enabling dwelling types to be balanced. Additional wider benefits of this option tend to result from the balanced approach it offers, whereby growth in Wood Street's population and local economy is encouraged, but not at the expense of existing facilities and spaces. This balance is likely to bring social (such as protected and improved community facilities) and economic benefits (such as increased inward investment).
- 11.5.2 In environmental terms, **Option One** appears to be weaker. In terms of greenhouse gas emissions it fails to take full advantage of the gains that more concentrated development, such that proposed through **Option Three**, can bring about in terms of energy efficiency and sustainable transport uptake. However, in relation to Wood Street's biodiversity and open spaces (including Epping Forest), lower densities such as that set out in **Option Two** are considered preferable due to lesser direct (development footprint) and indirect impacts (visitor numbers). However, given these contrasting results, in which lower and higher degrees of density are preferred for separate environmental aspects, **Option One's** balanced approach perhaps represents the best overall compromise.
- 11.5.3 **Appendix V** presents appraisal findings in full.
- 11.5.4 The Council's preferred approach
- 11.5.5 [The Council's preferred option is to set a target of up to 1000 new houses to be developed over the plan period. This would allow for an increase number of space per unit, creating attractive family homes and allow for more (private or communal) open space per unit]

11.6 Affordable housing

Alternative options considered

1. Provision of affordable homes, in accordance with our DM policies DPD, but with requirements to be established on a site-by-site basis.
2. Requiring financial contributions in lieu of provision for affordable housing.

Summary of appraisal findings

- 11.6.1 The approach set out in **Option One** is clearly the preferred option when considered against all relevant SA objectives. The policy's flexibility should prevent any failure to deliver development as a result of viability concerns, whilst also ensuring that affordable housing is delivered wherever possible and that deferred contributions are received where it cannot be delivered. This may result in **significant positive effects** in terms of the delivery of homes to

meet local housing need and in reducing deprivation. In addition, the creation of mixed-income communities encouraged through this approach could also help to tackle crime and the fear of crime and maintain or improve the wellbeing of Wood Street residents, whilst also increasing local incomes in a manner which may support the Wood Street town centres, inward investment, and local employment.

11.6.2 In contrast it is considered possible that **Option Two** could result in a range of negative effects. At the root of these is the failure to address local and Borough-wide requirements for additional affordable housing. **Significant negative effects** in this respect include a failure to meet local needs for affordable housing, plus the negative consequences in terms of deprivation (overall and housing) and wellbeing that may result as a result of this failure. In addition, whilst it is considered possible that **Option Two** may increase spending power in the Wood Street area, with positive economic effects, this benefit could be outweighed by the negative social and associated economic impacts of a failure to address local affordable housing need. As such, this option is considered to be the least preferred in terms of the risk it may present to the viability and vitality of Wood Street town centre, levels of inward investment, and local employment.

11.6.3 **Appendix VI** presents appraisal findings in full.

The Council's preferred approach

11.6.4 The Council has identified a need to improve the existing affordable homes in the Wood Street area, in particular Marlowe Road Estate.

11.6.5 Promoting the right mix of homes, both in terms of tenures and type should facilitate achieving balanced communities. The Council seeks to retain and attract economically active families in the borough and therefore considers that it is important to encourage the provision of family houses.

11.6.6 On some development sites a lower proportion of affordable units could be provided with the shortfall to be treated as a deferred contribution to support the regeneration of existing affordable homes in the Wood Street area.

11.7 Connections

Alternative options considered

1. Creation of a pedestrian and cycle friendly environment where public transport is also supported – this would seek to avoid the segregation of different road users with priority generally given to pedestrians and cyclists and account taken of the requirements of vulnerable road users and mobility impaired people. It would also involve a range of measures to manage car parking to ease the impact of new development on the transport network and services. Parking levels for individual developments would be determined on the basis of need in accordance with the Council's parking hierarchy, public transport accessibility levels (PTAL) and supporting Transport Assessment and the Travel Plan.
2. As per (1) but transform Wood Street into a one-way street or restrict central sections of Wood Street for car traffic altogether. In addition to the approach set out in (1) above, this option would turn central sections of Wood Street into a one-way street, or potentially restrict central sections of Wood Street for car traffic, making it a completely car-free area.
3. Increase capacity of network following a 'predict and provide approach' – this would seek to increase capacity at junctions to reduce congestion. It would not place restrictions on parking provision / enable a higher provision of parking than allowed by DM policy and would introduce additional visitor parking in the town centre.

Summary of appraisal findings

- 11.7.1 Of the approaches presented, **Option Two** is likely to result in the highest level of sustainability. In particular it is likely to have a number of environmental benefits by reducing greenhouse gas emissions (through restricting car parking provision and potentially completely restricting car access in central parts of Wood Street), improving air quality, and improving opportunities for access to local services, facilities and employment through an integrated sustainable transport system (through improving access routes for pedestrians and cyclists).
- 11.7.2 It is also expected to have some **significant positive effects** in terms of the social objectives by improving the standard of health and wellbeing in the area (through encouraging sustainable methods of transport over car use). However the approach is also likely to lead to some negative effects in terms of the social objectives by displacing traffic from Wood Street into less suitable streets including Shernhall Street, where a number of schools are located. Significant increases in traffic on these streets would likely raise safety issues.
- 11.7.3 **Option One** also performs well across the objectives, particularly in terms of the environmental objectives, as well as some of the social objectives. In particular it is likely that the approach may help to reduce crime and the fear of crime by restricting the amount of space used for car parking which in turn should increase the scope for other forms of development to come forward thereby generating greater levels of activity and footfall in Wood Street. It is also considered the best option in terms of making the best use of previously developed land through ensuring that land used for parking provision is provided only where a clear need for it can be demonstrated.
- 11.7.4 The approach set out by **Option Three** performs the worst overall, but particularly against the environmental objectives. It is notable that it is predicted to lead to **significant negative effects** in terms of worsening air quality (through increasing provision of car parking in the town centre) and making inefficient use of previously developed land in the AAP area.
- 11.7.5 **Appendix VII** presents appraisal findings in full.
- The Council's preferred approach**
- 11.7.6 The plan seeks to protect Wood Street's function both as an important connection to the town centre and the surrounding neighbourhoods.
- 11.7.7 The Council's preferred approach is to improve the pedestrian and cycle connections and provide a safe, accessible, comfortable, inclusive and attractive environment for walking and cycling by:
- Improving connections to key destinations such as Walthamstow Town Centre and Walthamstow Central Station, Epping Forest, Walthamstow Village, and Whipps Cross Hospital;
 - Reintegrating routes and blocks back into the traditional grid network and establishing a grid based network where redevelopment provides the opportunity to do so; thereby creating short and direct pedestrian routes that are easy to understand and navigate through and allow a choice of routes;
 - Where redevelopment provides the opportunity, ensuring buildings line primary routes and active uses, including entrances to buildings, face the street to improve natural surveillance and activity to make the area safe and secure. The proposed mix of uses will help ensure natural surveillance throughout the day and evening;
 - Where redevelopment provides the opportunity, designing residential streets and mews as Homes Zones to create an environment with local amenity that encourages social interaction;
 - Designing streets in a manner that, where appropriate, avoids segregation of different road users (i.e. pedestrians, cyclists and cars) and calms traffic, contributing towards

achieving an appropriate balance between the needs of all transport modes and make all users more aware of the presence and priority accorded to themselves and others. Introducing a 20mph speed limit along Wood Street and surrounding residential streets to improve road safety in the area; and

- Improving pedestrian facilities at Forest Road and Wood Street junction, which is a main gateway to the area.

11.8 Sustainability and energy

Alternative options considered

1. Creation of a CHP and decentralised energy network - new developments in the AAP area would be required to connect to an existing or planned district heating network where appropriate, and to be “connection ready” for future networks and to make contributions towards the installation of an area wide district heating network in accordance with the DM Policies DPD
2. Focusing on energy efficiency and renewable energy generation to reduce carbon emissions and not drive decentralised energy forward in the area, relying solely on energy efficiency and renewable energy generation to meet carbon reduction targets
3. Setting higher environmental targets and building design standards for Wood Street over and above the existing targets set out in the Development Management DPD

Summary of appraisal findings

- 11.8.1 Of the three approaches put forward, Option One, with its requirement for new developments in the AAP area to connect to an existing or planned district heating network, to be “connection ready” for future networks and to make contributions towards the installation of an area wide district heating network in accordance with the DM Policies DPD, is the strongest performing option overall, and performs particularly well against the environmental objectives.
- 11.8.2 It is notable however that **Option Three** is expected to have the most beneficial impacts in terms of conserving, and where possible enhancing, the historic environment by prescribing environmental and sustainable design standards that go beyond those set out in the Development Management DPD.
- 11.8.3 **None of the approaches** are expected to produce any significant effects against the baseline in terms of the economic objectives. In terms of the social objectives, the approaches are also not expected to have any significant effects, although **Option Two** is expected to have the most beneficial effects in terms of helping to meet local housing need.
- 11.8.4 **Appendix VIII** presents appraisal findings in full.

The Council’s preferred approach

- 11.8.5 The Council seeks to facilitate the delivery of a combined heat and power (CHP) and decentralised energy network (DEN) in the Wood Street area in order to reduce carbon dioxide emissions, provide a cost effective way to reduce energy consumption, and secure affordable energy supply in the future. The Council will work with neighbouring boroughs and the GLA to deliver a local satellite decentralised energy network.
- 11.8.6 The Council will also work with its partners to ensure the communal heating systems in the plan area will be protected. Once a district heating system becomes available, communal heating systems will be compatible to connect into those district heating systems. New developments in the AAP area will be required to connect to an existing or planned district heating network where appropriate, and to be “connection ready” for future networks.

11.9 Open space

Alternative options considered

1. Balanced provision of private, communal and public open space in the AAP area – this approach would seek to protect existing sensitive sites, enhance the existing green infrastructure in the AAP area and create new/improved public open space. It would also seek to provide new high quality private open space as part of new developments in order to address areas with identified shortfalls in private open space.
2. Maximise amount of open space in the AAP area - this option would involve establishing a large network of new open spaces in the plan area.
3. Maximise the amount of private space in the form of private and communal gardens (with less focus on public open space). This approach would set higher external space standards and/or require the external space standards to be met by private and communal gardens (but not balconies).

Summary of appraisal findings

- 11.9.1 Of the alternative options presented, the approach set out in **Option One** is predicted to result in the highest level of sustainability overall. In particular, it may result in significant **positive effects** in terms of reducing crime and the fear of crime (through the open space standards and targeted approach to enhancing open spaces that it sets out), and improving the standard of health and wellbeing of those who live and work in Wood Street (as a result of improving accessibility to Epping Forest and enhancing and providing new areas of public open space for recreational use). It is also expected to result in economic benefits by maintaining and enhancing the vitality and viability of Wood Street's town centre (through providing enhancements to existing areas of public open space and increasing activity and footfall in the town centre) and in improving the local economy by attracting inwards investment (through enhancing the appearance and quality of key areas of existing public open space). Overall, it is considered to be the preferable option in terms of the range of social and economic SA objectives it is likely to provide, and although it performs less well than **Option Two** against many of the environmental objectives, it is nonetheless expected to have some **positive effects** on these.
- 11.9.2 **Option Two**, with its emphasis on maximising provision of public open space through the creation of a large open space network, is expected to result in the greatest environmental gains by maintaining and enhancing areas of open space and protecting the ecological integrity of Epping Forest. However this option is also predicted to have some **significant negative effects** in terms of some of the social SA objectives, by constraining the amount of land that would be redeveloped in Wood Street, and by not making the best use of previously developed land.
- 11.9.3 **Option Three**, with its focus on maximising the provision of private amenity space, is not predicted to result in any significant negative effects against the objectives. However, overall this approach is predicted to offer the least benefits in terms of the SA objectives.
- 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 provide a balance of private, communal and public open space within the Wood Street plan area. In addition to creating a new open space in Wood Street opportunities to create private or communal open spaces will be necessary.

11.10 Employment on Wood Street

Alternative options considered

1. Option focusing on the protection of Borough employment sites; diversifying the

employment offer; and ensuring that employment uses are of a suitable type and nature to complement town centre uses. This approach would protect employment sites on Clifford Road and Barratt Road, encourage the intensification of employment uses on existing employment sites, encourage developers to provide flexible employment space and community uses and seek to ensure that employment proposals will not have any negative impacts on neighbouring uses.

2. Creation of an employment hub in Wood Street. This option would seek the intensification of employment uses on Borough employment land and cluster employment uses on adjacent sites.

Summary of appraisal findings

- 11.10.1 **Option One** is predicted to have the most **positive effects** in terms of the SA objectives. With regards to the social objectives, it should help to increase local housing needs (through facilitating the creation of additional residential space on some employment land in Wood Street), reduce crime and the fear of crime (through promoting the emergence of a greater mix of uses in Wood Street), and increase the provision of and access to community facilities to meet local cultural, recreational and social needs (through encouraging developers to provide community uses as part of new developments where it is viable). It is also expected to have some **positive effects** in terms of the environmental objectives by reducing greenhouse gas emissions and improving air quality (through the creation of mixed-use development). The approach presented by **Option One** is also expected to create economic benefits in terms of helping to maintain and enhance the vitality and viability of Wood Street's town centre (through encouraging diversification of employment uses) and help improve the local economy through attracting inward investment.
- 11.10.2 The approach presented by **Option Two** performs significantly less well overall than Option One in terms of the SA objectives, nonetheless it is expected to create some benefits. For example it is predicted to help reduce deprivation and maintain stable levels of employment by encouraging clustering of employment uses on land adjacent to existing employment sites which could result in the creation of additional employment space in Wood Street thus potentially facilitating job creation.
- 11.10.3 **Appendix X** presents appraisal findings in full.

The Council's preferred approach

- 11.10.4 The Council seeks to encourage employment uses that complement the town centre and encourage the creation of small and medium enterprises and community uses in the area will create additional jobs and diversify the employment offer in the area.

12 ALTERNATIVE APPROACHES TO DEVELOPING 'OPPORTUNITY SITES'

- 12.1.1 The Preferred Option Document identifies aspirations for 19 'Development Sites' within the AAP area. The plan document explains how these sites were identified. Essentially, the 19 development sites can bring significant benefits to the area.
- 12.1.2 For each site, prior to preparing the Preferred Options Consultation Document, 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 on each Opportunity Site.
- 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 Preferred Options Consultation Document.

12.2 Cedar Wood House

Alternative options considered

1. Retention of existing listed building with sensitive approach to renewal and refurbishment (with a preference for office use)
2. Comprehensive redevelopment

Summary of appraisal findings

- 12.2.1 Both of the **alternative options** put forward should be capable of helping to address local housing need, of tackling crime and the fear of crime in the vicinity of the site, preventing transport congestion and associated environmental impacts. They should also help to bring inward investment and prevent losses in employment and increased local deprivation.
- 12.2.2 In terms of the merits of each of the options, it is notable that **Option One** seeks to preserve and sensitively enhance the existing Cedar Wood House, so resulting in **significant positive effects** in terms of making best use of existing buildings and enhancing the historic environment of Wood Street. In comparison, the comprehensive redevelopment of **Option Two** would lead to the loss of the building, so leading to **significant negative effects** against these same SA objectives.
- 12.2.3 **Appendix XI** presents interim appraisal findings in full.

The Council's preferred approach

- 12.2.4 Residential use involving the sensitive renewal and refurbishment of Cedar Wood House, possibly with a commercial use on the ground floor.

12.3 Goss Components

Alternative options considered

1. Intensification via mixed use development to include employment and residential uses.
2. Retail use.
3. 100% residential.
4. 100% employment.

Summary of appraisal findings

- 12.3.1 Of the approaches put forward, **Option One** is considered to be the strongest when considered against all SA objectives. It is likely to have **positive effects** in terms of meeting housing need, crime reduction, tackling deprivation, maintaining local employment, attracting inward investment, supporting the town centre, and encouraging more sustainable transport patterns. This is primarily a result of its mixed use approach, which encourages both housing growth and employment use through intensification.
- 12.3.2 Of the remaining alternative options, **Options Two and Three** are considered to be least preferable. Whilst **Option Three** could result in significant positive effects in terms of meeting local housing need and could provide benefits to Wood Street town centre, the loss of local employment space this would trigger may lead to **significant negative effects** in relation to employment and associated deprivation. Meanwhile, the pursuit of retail uses alone through **Option Two** could undermine the Wood Street town centre and so reduce its viability.
- 12.3.3 Finally, **Option Four's** suggested employment use of the site would offer little change from the status quo, and so could represent a missed opportunity to bring housing growth to the area (with associated economic benefits) and would not improve levels of natural surveillance.
- 12.3.4 **Appendix XII** presents interim appraisal findings in full.

The Council's preferred approach

- 12.3.5 Mixed use including residential with the provision of affordable workspaces at ground floor level.

12.4 Walthamstow Business Centre

Alternative options considered

1. Intensification by a mixed use development to include employment (business) and residential uses.
2. 100% employment
3. 100% residential

Summary of appraisal findings

- 12.4.1 The approach set out through **Option One** is considered to be the strongest when considered against all SA objectives. This option is likely to bring about **positive effects** in relation to meeting housing need, crime reduction, tackling deprivation, maintaining local employment, attracting inward investment, supporting the town centre, and encouraging more sustainable transport patterns. This is primarily a result of its mixed use approach, which encourages both housing growth and employment use through intensification.
- 12.4.2 Of those remaining, **Option Three** is considered to be the least preferable. Whilst this option could result in **significant positive effects** in terms of meeting local housing need and could provide support to the Wood Street town centre, the loss of local employment space this would trigger may lead to significant negative effects in relation to employment and associated deprivation.
- 12.4.3 Finally, **Option Two's** suggested employment use of the site would offer little change from the status quo, and so could represent a missed opportunity to bring housing growth to the area (with associated economic benefits) and would not improve levels of natural surveillance.
- 12.4.4 **Appendix XIV** presents interim appraisal findings in full.

12.5 Ardleigh Works

Alternative options considered

1. Mixed use development to include employment (businesses and office use and ancillary uses) and residential uses.
2. 100% employment
3. 100% residential

Summary of appraisal findings

- 12.5.1 Of the alternative options that have been put forward, the approach outlined by **Option One** is considered to be the strongest across all SA objectives. The mixed use approach it calls for should help to reduce crime through natural surveillance, encourage sustainable transport use through a combination of residential and commercial units, support the town centre through housing growth, and tackle deprivation by securing local employment space.
- 12.5.2 Whilst **Option Three** could result in **significant positive effects** in terms of meeting local housing need and could provide benefits to Wood Street town centre, the loss of local employment space this would trigger may lead to **significant negative effects** in relation to employment and associated deprivation. Finally, **Option Two's** suggested employment use of the site would offer little change from the status quo, and so could represent a missed

opportunity to bring housing growth to the area (with associated economic benefits) and would not improve levels of natural surveillance.

12.5.3 **Appendix XIII** presents interim appraisal findings in full.

[The Council's preferred approach](#)

12.5.4 Mixed use development to include employment (businesses and office use and ancillary uses) and residential uses.

12.6 **Sterling House**

[Alternative options considered](#)

1. Mixed use scheme, with residential on the upper storeys of this development and an active use such as social infrastructure or commercial use on the ground floor.
2. 100% residential.
3. 100% office employment.
4. Refurbishment of existing building.

[Summary of appraisal findings](#)

12.6.1 Overall, in terms of the sustainability objectives there is little to distinguish between **Options One and Two**. Both approaches are expected to have **positive effects** in terms of a number of the objectives, particularly through increasing local housing supply and thus addressing local housing need (with **Option Two** performing slightly better than **Option One** by offering the potential for a higher amount of new housing); reducing crime and the fear of crime (by activating the site's frontage and increasing levels of activity on the site); and reducing greenhouse gas emissions (by limiting car parking and hence reducing car use). **Options One and Two** are also expected to make better use of the site (by intensifying uses and reducing car parking on site) thus having **significant positive effects** in terms of the objective. It is notable however that **Option One** would increase provision of and access to community facilities to meet local cultural, recreational and social needs.

12.6.2 Neither **Option Three** nor **Option Four** is predicted to have any significant effects in terms of the objectives as both offers little change from the status quo, however **Option Three** is expected to have some **positive contributions** in terms reducing crime, reducing greenhouse gas emissions and attracting inward investment.

12.6.3 **Appendix XV** presents interim appraisal findings in full.

[The Council's preferred approach](#)

12.6.4 Residential only or a mixed use scheme, with residential on the upper storeys and an active use such as social infrastructure or commercial use on the ground floor.

12.7 **Willow House**

[Alternative options considered](#)

1. Redevelopment of site with new building comprising residential on upper storeys with active use (e.g. social infrastructure or commercial) on ground floor.
2. 100% office employment.
3. Refurbishment of existing building.

Summary of appraisal findings

- 12.7.1 Of the three approaches, **Option One** is clearly the strongest performing in terms of the SA objectives. In particular, **Option One** would help address local housing need (through the provision of up to 50 new housing units), is expected to make better use of the land than the other two options (through intensifying / diversifying uses on the site and reducing the amount of surface car parking) and has the greatest potential to improve the local economy by attracting inward investment (through improving the condition and appearance of the site).
- 12.7.2 While **Option Two** is predicted to have some **positive effects** in terms of the SA objectives this is likely to be to a much lesser extent than **Option One**. The approach set out by **Option Two** should help to improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system (through improving the urban form and character of the area and intensifying the uses on the site which may result in an increased demand for greater public transport provision in the area) and should help to enhance the historic environment (through creating a new gateway development that will enhance the appearance of the site and the surrounding area).
- 12.7.3 Overall, the approach set out by **Option Three** offers little change to the status quo and is therefore not predicted to have any significant effects in terms of the baseline.
- 12.7.4 **Appendix XVI** presents interim appraisal findings in full.

The Council's preferred approach

- 12.7.5 Residential on the upper floors with commercial/social infrastructure on the ground floor.

12.8 Wood Street Corner Site

Alternative options considered

1. Residential-led mixed use development scheme with an active ground floor use.
2. Restoration of existing building.

Summary of appraisal findings

- 12.8.1 The approach set out by **Option One** is considered to be the preferable option as it performs better against the SA objectives overall. In particular it should help to address local housing need (through increasing local housing provision through the creation of 10-25 housing units), provide housing growth which may help to support the vitality and viability of the Wood Street town centre, and make better use of a prominent brownfield site (through bringing the site back into use with residential development).
- 12.8.2 **Both options** are also expected to enhance Wood Street's historic environment through bringing the site back into use, replacing the existing poor quality buildings on site with higher quality development and creating an active frontage that should complement Wood Street library. They are also expected to help to reduce deprivation in the area by supporting local economic development and job creation.
- 12.8.3 **Appendix XVII** presents interim appraisal findings in full.

The Council's preferred approach

- 12.8.4 Residential development possibly with an active ground floor USE

12.9 Marlowe Road Estate

Alternative options considered

1. Comprehensive redevelopment of the Marlowe Road Estate with 100% residential with

mix of private and affordable housing.

2. Refurbishment.
3. Residential but with higher number of flats and higher density.

Summary of appraisal findings

- 12.9.1 Of the approaches put forward for the Marlowe Road Estate site, it is **Option Three** that is considered strongest when taking into account all SA objectives. This option is predicted to result in **significant positive effects** in a number of respects. These are in terms of reducing crime (through improved layout and design); encouraging sustainable transport patterns and reducing traffic emissions (by making the best use of a central location); and conserving energy and reducing greenhouse gas emissions (by facilitating optimum energy efficiency, CHP viability and sustainable transport). In addition, this approach is the preferred option in terms of addressing deprivation, supporting the town centre, and encouraging inward investment and employment.
- 12.9.2 **Option Three's** strength lies in its high density and redevelopment led approach. A redevelopment approach provides a high number of opportunities for improvement through design, whilst a large number of potential beneficiaries and consumers are provided by a high density. This high density also makes maximum use of the sites central location and the various sustainability benefits this confers.
- 12.9.3 **Option One** in contrast offers the same opportunity for large scale improvements in terms of design, but at a lower density. Meanwhile, **Option Three** offers far more limited scope for whole-scale design improvements through its refurbishment led approach.
- 12.9.4 The primary advantage of **Option One** is its focus on providing family homes, which will address and identified need for such housing in the Borough. This is in contrast to **Option Three**, which will focus on providing flats at high density, and **Option Two**, which will offer no change from the status quo in terms of housing mix. It is important that the need for family housing is addressed across the plan area. However, given the relative strength of **Option Three** in terms of sustainability, it is recommended that the highest density possible is achieved on this site (whilst ensuring that in combination the sites put forward in the plan-area meet locally identified family housing needs).
- 12.9.5 **Appendix XVIII** presents interim appraisal findings in full.

The Council's preferred approach

- 12.9.6 Residential development comprising of high quality homes, with a focus on family units. A mix of private and affordable and of houses and flats should be achieved that helps to create a sustainable community and reflects the character of the wider area including terraced family housing.

12.10 Brandon Road Car Park

Alternative options considered

1. 100% residential.
2. Employment-led mixed use scheme.
3. 100% employment scheme.

Summary of appraisal findings

- 12.10.1 There is very little to differentiate between the **three options** overall as they are all expected to have positive effects against a number of the SA objectives. **All three options** should help to tackle crime and the fear of crime through providing more active uses on the site and should

make better use of the site through intensifying uses. They should also improve air quality through reducing the amount of car parking and should help to tackle deprivation through job creation, although **Options Two and Three** are expected to result in longer term **positive effects** in terms of this objective in comparison to **Option One**.

12.10.2 In terms of their individual merits, it is notable that **Option One** is expected to help address local housing need. Should the mixed use element of **Option Two** include housing, this would also be expected to contribute to addressing local housing need, though to a slightly lesser extent than **Option One**.

12.10.3 In addition, while all three options should help to improve air quality through a reduction in traffic-based emissions, the level of residential development set out by **Option One** takes into account the London Plan Density Matrix's suggested appropriate density for the area's PTAL level, which makes it the preferable option overall in terms of preventing increased greenhouse gas emissions as a result of car use.

12.10.4 **Appendix XIX** presents interim appraisal findings in full.

[The Council's preferred approach](#)

12.11 Residential development.

12.11.1 Woodside School Car Park (Bridge Site)

[Alternative options considered](#)

1. Residential-led mixed-use development, possibly with education use on ground floor along Wood Street.
2. Retail.

[Summary of appraisal findings](#)

12.11.2 The residential-led mixed use approach, potentially incorporating an education use, proposed by **Option One** is considered to perform well against the SA objectives. It is predicted to result in **positive effects** in terms of housing provision as the increased housing growth should help to provide support to local businesses and Wood Street's town centre. In addition the approach is expected to help support reductions in deprivation and crime, make better use of a key brownfield site and bring about positive changes in terms of reducing traffic-based emissions. Subject to the education element of this option coming forward, it is also expected to help provide improved opportunities for access to education facilities.

12.11.3 Although **Option Two** performs less well than **Option One** against the SA objectives, it is expected to have some **positive effects** through bringing what is currently a largely inactive site into a more active use, improving opportunities for access to local services, facilities and employment through an integrated sustainable transport system, improving air quality through a reduction in traffic-based emissions and leading to on-site job creation.

12.11.4 **Appendix XX** presents interim appraisal findings in full.

[The Council's preferred approach](#)

12.11.5 Residential led mixed use with educational use on the ground floor.

12.12 Scout Hall and Church (former factory)

[Alternative options considered](#)

1. Residential development with social/community use on ground floor.
2. 100% residential.

Summary of appraisal findings

- 12.12.1 **Both options** put forward should be capable of helping to address local housing need, of reducing crime and the fear of crime around the site, tackling deprivation, enhancing the vitality and viability of Wood Street's town centre, maintaining stable levels of employment in the area, and improving opportunities for access to local services, facilities and employment through an integrated sustainable transport system. In addition **both options** should reduce the extent of car parking on site which should help to improve air quality through reducing traffic-based emissions and should make better use of this brownfield site.
- 12.12.2 In terms of the merits of each of the options, it is notable that **Option One** seeks to both retain and improve the quality of social/community infrastructure facilities on site while **Option Two** is likely to result in these facilities being lost from within the Wood Street AAP area, thus leading to a **significant negative effect** in terms of this objective.
- 12.12.3 **Appendix XXI** presents interim appraisal findings in full.

The Council's preferred approach

- 12.12.4 Residential development with community use on the ground floor.

12.13 Dairy Site

Alternative options considered

1. Residential-led mixed use development with commercial use on ground floor along Wood Street and residential above.
2. Retail use

Summary of appraisal findings

- 12.13.1 The residential led, mixed-use approach to the redevelopment of the Dairy Site proposed through **Option One** is considered to perform well against the SA objectives. It is predicted to result in **positive effects** in terms of housing provision, and as a result of the increased support such housing growth will potentially provide to local businesses and the Wood Street town centre. This, along with a focus on commercial rather than retail uses (which could compete with the District Centre), may help to support reductions in deprivation, increased employment, and inward investment. A mixed-use approach is also likely to lead to gains in terms of crime reduction, plus changes in transport patterns and associated emission reductions.
- 12.13.2 In contrast, an entirely retail led approach, as set out in **Option Two**, is likely to result in competition with the town centre which may result in **significant negative effects** in terms of its vitality and viability. Whilst this option may have localised benefits in relation to employment and reductions in deprivation, it is less likely to support such reductions across the whole Wood Street area. In addition, a single use approach is less likely to discourage crime and support sustainable patterns of transport.
- 12.13.3 **Appendix XXII** presents interim appraisal findings in full.

The Council's preferred approach

- 12.13.4 Residential development with commercial use on the ground floor.

12.14 Crownlea Site

Alternative options considered

1. A residential-led mixed use or residential only development scheme.
2. Retail use.

4. Partial redevelopment to housing.

Summary of appraisal findings

- 12.14.1 The residential mixed-use or residential only approach set out through **Option One** is considered to perform well against the SA objectives. It is predicted to result in **positive effects** in terms of housing provision, as a result of the increased support such housing growth will potentially provide to local businesses and the Wood Street town centre. This approach may help to support reductions in deprivation, increased employment, and inward investment. A mixed-use approach (if pursued over full residential) is also likely to lead to gains in terms of crime reduction, plus changes in transport patterns and associated emission reductions.
- 12.14.2 In contrast, an entirely retail led approach, as set out in **Option Two**, is likely to result in competition with the town centre which may result in **significant negative effects** in terms of its vitality and viability. Whilst this option may have localised benefits in relation to employment and reductions in deprivation, it is less likely to support such reductions across the whole Wood Street area. In addition, a single use approach is less likely to discourage crime and support sustainable patterns of transport (however, these disadvantages would also apply to **Option One** should a non-mixed use approach be pursued).
- 12.14.3 Finally, **Option Three** is less likely to achieve the same level of housing growth as **Option One** due to its partial release of land. As a result, the maximum potential of the site is unlikely to be achieved. For instance, high standards of transport accessibility, green infrastructure provision and access to open spaces are less likely to be achieved through a partial development of the site as a result of lower developer contributions and reduced land availability.
- 12.14.4 **Appendix XXIII** presents interim appraisal findings in full.

The Council's preferred approach

- 12.14.5 Residential-led mixed use with social infrastructure.

12.15 Lucerne Grove

Alternative options considered

1. 100% residential
2. Partial redevelopment

Summary of appraisal findings

- 12.15.1 Of the two approaches presented, **Option One** is most likely to result in gains when considering all SA objectives. This is due to the improved site viability and efficient use of land that may result from having the option to develop the entirety of the site. The larger scope for redevelopment this option offers may contribute to a greater degree towards meeting local housing need (though efficient usage of land), to reducing crime (through better design), and towards reducing deprivation, increasing employment and supporting the town centre (as a result of housing growth).
- 12.15.2 **Option Two** meanwhile is likely to achieve these benefits to a lesser extent. The buildings at the front of the site do however have townscape value. Their loss could have an impact on the wider historic environment of Wood Street, and so **Option Two's** protective approach is beneficial in this respect. However, it should be noted that opportunities for the maintenance of these buildings are to also be explored as an element of any development proposal coming forward through **Option One**.
- 12.15.3 **Appendix XXIV** presents interim appraisal findings in full.

The Council's preferred approach

12.15.4 Residential.

PART 3: WHAT ARE THE APPRAISAL FINDINGS AND RECOMMENDATIONS AT THIS CURRENT STAGE?

13 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

13.1.1 The aim of Part 3 is to present appraisal findings and recommendations in relation to the draft plan approach as set out within the Preferred Options Consultation Document. Part 3 is structured as follows:

- Chapters 14 presents an appraisal of the draft plan under ten ‘sustainability topic’ headings
- Chapter 15 discusses overall conclusions at this current stage
- Chapter 16 summarises recommendations.

14 APPRAISAL OF THE DRAFT (PREFERRED OPTIONS) AAP

14.1 Methodology

14.1.1 The appraisal is structured under ‘ten sustainability topic’ headings. For each topic a range of sustainability objectives and issues (as identified through scoping) are listed. Taken together, the sustainability topics, objectives and issues provide a methodological ‘framework’ for the appraisal of likely significant effects on the baseline.

14.1.2 Within each sustainability topic chapter there is an appraisal of: 1) the preferred approach to area-wide policy; and 2) the preferred approach to development sites. For both (1) and (2) ‘significant effects’ on the baseline / likely future baseline are identified and evaluated. Where possible, significant effects associated with ‘the plan as a whole’ are also identified/evaluated.

14.1.3 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 of the 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.²² In many instances it is not possible to predict significant effects, but it is possible to comment on merits (or otherwise) in more general terms.

14.1.4 It is important to note that effects are predicted taking into account the criteria presented within Schedule 2 of the Regs.²³ 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

14.1.5 To give the appraisal ‘added structure’, each area-wide policy and development 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.

↗	Positive implications.
↔	No implications.
↘	Negative implications.
?	Uncertain implications.

²² As stated by Government Guidance (The Plan Making Manual, see <http://www.pas.gov.uk/pas/core/page.do?pagelid=156210>): "Ultimately, the significance of an effect is a matter of judgment and should require no more than a clear and reasonable justification."

²³ Environmental Assessment of Plans and Programmes Regulations 2004

14.2 Air

Relevant sustainability objectives

- Objective 10 - Reduce greenhouse gas emissions
- Objective 12 - 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

Area-wide policy	Spatial approach to growth	WS3/4: Shopping	WS5: Placemaking	WS8: Housing Growth	WS9: Affordable Housing	WS12/13: Connections	WS17: Sustainability & Energy	WS18/19: Open Space & Nature	WS21/22: Employment
Broad implications	↗	↔	↗	↗	↔	↗	↗	↔	↗

14.2.1 The primary opportunity to reduce air pollution in the plan area is likely to be through reductions in transport emissions, particularly resulting from private car use. The preferred, balanced spatial approach as set out in Section 3.1 may lead to improvements in air quality as it looks to deliver development in the most **sustainable locations** and to **rationalise existing land uses**. The rationalisation of land uses proposed through this alternative may also present opportunities for the deployment of renewable energy systems, such as CHP systems²⁴, which positive effects in terms of reducing greenhouse gas emissions. The establishment of **CHP systems** in the Wood Street area is supported by Policy WS17, which is expected to lead to reductions in GHG emissions.

²⁴ An energy study on heat demand in the Borough has indicated that there is an opportunity for the establishment of a decentralised energy network in the Wood Street area.

- 14.2.2 The level of housing growth proposed though Policy WS1 will be guided to sustainable locations²⁵ and as such is likely to result in moderate improvements in sustainable transport uptake. In addition, the degree of housing growth proposed is likely to result in some opportunities for **energy efficiency gains** and the establishment of CHP systems, with resulting reductions in GHG emissions. The approach to employment areas in Wood Street set out though Policy WS21 may encourage an **intensification of uses** on existing employment sites and would also facilitate the creation of **mixed-use development** on certain sites. Provision of mixed use development would increase the scope for residents to live within close proximity to employment; thus increasing the likelihood of more journeys being made through sustainable modes of transport such as walking or cycling.
- 14.2.3 In terms of urban design, the preferred approach set out in Policy WS5 presents a balanced approach which will allow tall buildings where appropriate, whilst restricting their creation elsewhere (such as where public transport links are poor). The increased **accessibility and legibility** promoted by this alternative is also likely to encourage transport by foot. Preferred Policy WS12's approach to the design of new streets, which will prioritise the needs of pedestrians and cyclists over car users, is expected to **reduce car dependency** and so result in improvements in terms of air quality and reducing GHG emissions.

Appraisal of the preferred approach to development sites

Development site	Site 1 - Cedar Wood House	Site 2 - Goss Component	Site 3 - Ardleigh Works	Site 4 - Walthamstow Business Centre	Site 5 - Sterling House	Site 6 - Willow House	Site 7 - Wood Street Corner	Site 10 - Marlowe Road Estate	Site 12 - Brandon Road Car Park	Site 15 - Woodside School Car Park (Bridge Site)	Site 16 - Scout Hall and Church (former factory)	Site 17 - Dairy	Site 18 - Crownlea	Site 19 - Lucerne
Broad implications	↗	↗	↗	↗	↗	↗	↔	↗	↗	↗	↗	↗	↗	↔

- 14.2.4 The approaches proposed for 12 of the development sites considered are expected to have positive implications on the air quality objectives, with no implications predicted for the Wood Street Corner or Lucerne sites.
- 14.2.5 In terms of the approaches for sites that are expected to have positive implications on the air objectives, this is largely due to the fact that the redevelopment proposals should result in a **reduction in car parking** and will take account of the London Plan Density Matrix's suggested appropriate density for the areas' PTAL level, which should help to **prevent increased greenhouse gas emissions** as a result of car use.
- 14.2.6 The mixed-use approaches proposed for Sites 2, 3 and 4 are expected to help reduce the need to travel for employment or services, so **potentially reducing the use of transport and emissions** associated with it.

²⁵ Development to be guided towards areas accessible by public transport through Policy CS7 of the Waltham Forest Core Strategy

Summary

- 14.2.7 The **area-wide policies** are expected to have either a positive implication or 'no implication' in terms of the air-related sustainability objectives. Of these policies, the balanced spatial approach to growth is likely to lead to particularly **positive effects** in terms of air quality through its delivery of development to the most sustainable locations and the rationalisation of existing land uses.
- 14.2.8 In terms of GHG emissions, CHP systems are to be supported through Policy WS17, with this likely leading to **positive effects**. Meanwhile, Preferred Policy WS12's approach to the design of new streets may lead to reductions in car dependency, with **positive effects** in terms of air quality and reducing GHG emissions.
- 14.2.9 The approach to the **development sites** is also expected to have a largely **positive effect**. This is due to both the emphasis on reducing levels of car parking, and for the majority of the development sites, the emphasis on a mixed-use approach to redevelopment. Together, this should **encourage residents to walk** in order to access their daily needs, and **increase the use of public transport** when medium to long distance travel is necessary.

14.3 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

Area-wide policy	Spatial approach to growth	WS3/4: Shopping	WS5: Placemaking	WS8: Housing Growth	WS9: Affordable Housing	WS12/13: Connections	WS17: Sustainability & Energy	WS18/19: Open Space & Nature	WS21/22: Employment
Broad implications	↗	↔	↔	↘	↔	↔	↔	↗	↔

14.3.1 The preferred spatial approach to growth set out in Policy WS0 aims to focus significant development in the most sustainable locations and so may reduce direct or indirect impacts of areas of biodiversity interest. In addition the proposed rationalisation of new developments could provide opportunities for **strategic biodiversity enhancement**. The Epping Forest Natura 2000 site is situated within 3.2km walking distance of all homes within the plan area. As such there is some potential for direct and indirect effects as a result of new development. Policy WS0, through its planned intervention approach could potentially mitigate against this by providing new open spaces capable of **drawing visitors away** from the more sensitive Forest site, so helping to ensure its ecological integrity is maintained.

14.3.2 In terms of open space and the biodiversity value of such spaces, Policy WS7 may be expected to have positive effects by **enhancing existing green infrastructure** and ensuring that any new development would protect and enhance existing open space. Whilst this policy also seeks to improve accessibility to Epping Forest which would be expected to result in an increase in its use, this approach would involve the Council working with the

Corporation of London to ensure that access to Epping Forest is **carefully managed**. Furthermore, the approach seeks to enhance existing less sensitive open spaces as a means of increasing the provision of alternative choices for residents to access open space.

14.3.3 Development at **higher densities** is less likely to provide the space required to incorporate green infrastructure improvements that can bring benefits to biodiversity. In addition, **higher levels of population** may generate indirect impacts on the areas biodiversity, particularly Epping Forest. The moderate housing growth set out in Policy WS4a may bring about impacts of this kind, although it should be noted that **developer contributions** from new development could be used to strategically target improvements in the area’s biodiversity.

Appraisal of the preferred approach to development sites

Development site	Site 1 - Cedar Wood House	Site 2 - Goss Component	Site 3 - Ardleigh Works	Site 4 - Walthamstow Business Centre	Site 5 - Sterling House	Site 6 - Willow House	Site 7 - Wood Street Corner	Site 10 - Marlowe Road Estate	Site 12 - Brandon Road Car Park	Site 15 - Woodside School Car Park (Bridge Site)	Site 16 - Scout Hall and Church (former factory)	Site 17 - Dairy	Site 18 - Crownlea	Site 19 - Lucerne
Broad implications	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↔	↗	↔

14.3.4 The policy approaches to all of the **development sites** considered, with the exception of Site 18, are expected to have no implications in terms of the biodiversity-related objectives.

14.3.5 The preferred approach to Site 18, which sits on the eastern boundary of the AAP area and is located within 300 metres of Epping Forest, is predicted to have some positive implications in terms of biodiversity as a result of planting and landscaping which should help to create a network of green infrastructure provision on the site and the surrounding area.

Summary

14.3.6 Of the **area-wide policies** the majority are predicted to have ‘no effect’ in terms of this objective. Of those that are likely to influence Wood Street’s biodiversity, the proposed spatial approach of WS0 may have positive implications as a result of focusing development to sustainable locations and a rationalisation of land uses which may present opportunities for strategic biodiversity enhancements. Particularly **positive effects** are likely to occur as a result of Policy WS7 which looks to enhance existing green infrastructure and protect open space, whilst managing access to Epping Forest.

14.3.7 The growth in housing proposed through Policy WS4a may bring about **negative effects**, both direct and indirect on Wood Street’s biodiversity as a result of development and associated population growth. There is, however, the opportunity to use developer contributions from the development to strategically target improvements in the area’s biodiversity.

14.3.8 All but one of the **development sites** are expected to have no implications on the biodiversity-related objectives. The preferred approach to Site 18 is expected to have some **positive effects** on biodiversity, as the approach to redevelopment would result in planting and landscaping which is expected to help establish a network of green infrastructure.

14.4 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

Area-wide policy	Spatial approach to growth	WS3/4: Shopping	WS5: Placemaking	WS8: Housing Growth	WS9: Affordable Housing	WS12/13: Connections	WS17: Sustainability & Energy	WS18/19: Open Space & Nature	WS21/22: Employment
Broad implications	↗	↗	↗	↔	↗	↗	↔	↗	↗

14.4.1 The preferred plan sets out a number of policies that looks to ensure that **diversity and mixed uses** are encouraged and that **good design** is incorporated into new developments. In particular, Policy WS3 encourages strong and continuous frontages are encouraged in conjunction with active ground floor uses, that public and private space is clearly defined, that the back and the front of developments are correctly orientated, and that community safety is considered more generally. Other policies supporting a mix of uses and the associated **continual ‘street life’** it can bring include Policy WS2’s approach to primary and secondary shopping areas, the balanced spatial approach of Policy WS0, and the approach to employment sites set out in Policy WS8.

14.4.2 Whilst evidence is not firmly established, the creation of **mixed income communities** may help to reduce levels of crime by countering the negative area effects that can occur as a result of concentrated areas of lower income housing, and the community segregation that can emerge from

concentrating higher income dwellings. The affordable housing approach set out in Policy WS4b may help to deliver more mixed income communities by providing affordable housing across all residential developments where it is viable.

14.4.3 Another aspect of urban design that may help to reduce crime is Policy WS5’s support for new development that priorities pedestrians and cyclists over cars. This may result in more **people-friendly streets**, which could result in greater activity and footfall in Wood Street. The approach set out in Policy WS7 is predicted to result in reduced levels of crime as a result of the provision of new open spaces at the heart of new development proposals, where they are **overlooked**, by improving pedestrian links to Epping forest (which are poor and badly lit), and by **improving existing public open spaces**, which will be particularly beneficial for the area around the Plaza, which is known to suffer from poor surveillance and perceptions of crime and anti-social behaviour.

Appraisal of the preferred approach to development sites

Development site	Site 1 - Cedar Wood House	Site 2 - Goss Component	Site 3 - Ardleigh Works	Site 4 - Walthamstow Business Centre	Site 5 - Sterling House	Site 6 - Willow House	Site 7 - Wood Street Corner	Site 10 - Marlowe Road Estate	Site 12 - Brandon Road Car Park	Site 15 - Woodside School Car Park (Bridge Site)	Site 16 - Scout Hall and Church (former factory)	Site 17 - Dairy	Site 18 - Crownlea	Site 19 - Lucerne
Broad implications	↗	↗	↗	↗	↗	↗	↗	↗	↗	↗	↗	↗	↗	↗

14.4.4 The preferred approach for all 14 of the **development sites** considered is expected to have some **positive implications** in terms of reducing crime and the fear of crime in the AAP area by seeking development that will increase activity and natural surveillance on the sites and the surrounding area.

14.4.5 In particular the approaches set out for Sites 6 and 7 are expected to have positive implications in terms of crime and safety by removing car parking from the front of the sites, activating the frontages and increasing footfall and activity on and around the sites.

14.4.6 The preferred redevelopment approach to the Marlowe Road Estate is considered likely to result in positive implications in terms of reducing crime and fear of crime in the area through the creation of a more permeable layout and basing the redesign on the objectives of ‘secure by design’.

14.4.7 Lastly, the redevelopment of Sites 12 and 15 from car parks to residential is also expected to have positive implications in terms of crime and safety by bringing the sites into more active uses which will help to increase natural surveillance in the area.

Summary

- 14.4.8 The majority of the **area-wide policies** presented are considered likely to result in a reduction in crime and the fear of crime in the Wood Street area, whilst the remaining policies are judged to have 'no effect' on this objective. The urban design principles set out in Policy WS3 are likely to result in particularly **positive effects** in terms of reducing crime and the fear of crime as a result of its focus on creating active, well-orientated, mixed-use development.
- 14.4.9 Several of the preferred policies will encourage continuous 'street' life' in the Wood Street area through a mix of uses, people friendly streets, and improvements to open spaces and the public realm. In addition, Policy WS4b may help to deliver more mixed income communities with potentially **positive implications** for reducing crime, and the fear of crime.
- 14.4.10 The approaches to all of the **development sites** considered are expected to have **positive implications** on the crime and safety objectives by increasing activity and surveillance on and around the sites.

14.5 **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

Area-wide policy	Spatial approach to growth	WS3/4: Shopping	WS5: Placemaking	WS8: Housing Growth	WS9: Affordable Housing	WS12/13: Connections	WS17: Sustainability & Energy	WS18/19: Open Space & Nature	WS21/22: Employment
Broad implications	↗	↘	↗	↗	↗	↗	↗	↗	↗

14.5.1 The preferred spatial approach to growth in Wood Street (Policy WS0) sets out to optimise development opportunities regardless of location and type of use and so is likely to deliver a pattern of development which **exploits synergies** and develops neighbourhood character. This approach should benefit the town centre economy and environment and boost the survival rate of the areas small businesses, with particularly beneficial effects. Also of particular benefit is Policy WA8’s flexible guidance for employment land which will enable the creation of **mixed-use schemes** where appropriate. This policy may potentially help to bring a greater number and variety of businesses into the area; thus helping to generate a wider range of employment opportunities and opportunities for inward investment. This approach would also seek to encourage **small-medium enterprises** (SME) and **creative and cultural industries** to set up in the area, so helping to diversify the local economy.

- 14.5.2 Wood Street’s shopping areas are addressed in Policy WS2, which sets out a **clear spatial strategy** that should help to ensure that the entire length of the town centre is well defined and used, so boosting business activity, and which may result in an increase in employment as a result of **higher levels of floorspace**. However, it should be noted that the provision of a mix of units (including larger sizes in greater numbers than at present) could result in a growth in **larger retailers**. In the short to mid-term this may lead to growth in the local economy. However, in the mid-long term larger businesses could negatively impact the **smaller businesses** that currently dominate the town centre, and which represent its **unique selling point**.
- 14.5.3 The approach to place making set out in Policy WS3 may reduce the range of investment opportunities available in the plan area as a result of the restrictions it imposes. However, **coordinated development** which is sensitive to the urban context, which improves legibility and accessibility, protects heritage assets, and which creates active, well-kept frontages on safe streets is more likely to result in a urban character in the town centre that is appealing to business, visitors, shoppers and to inward investors. **Wider improvements** to Wood Street in conjunction with economic development is also predicted for Policy WS5; the flexible approach to affordable housing that is set out in this policy should ensure that a rise in local spending power occurs without the intensification of existing of existing problems in terms of overall and housing deprivation.
- 14.5.4 The preferred housing policy WS4a will lead to a greater increase in population and so may bring about an **increased catchment** for Wood Street’s businesses, so increasing their viability and the ability of the area to attract inward investment. In addition, the moderate level of housing growth proposed should also help to ensure that **wider impacts** on the Wood Street environment and local services do not occur. Wood Street’s wider environment is likely to be important in terms of encouraging shoppers, visitors, and investment into the area. Policy WS6 should assist in this respect through the creation of more **pedestrian-friendly and connected streets**, whilst Policy WS7’s enhancement and creation of new areas of **public open space** is also be expected to increase the attractiveness of Wood Street and so boost its economy.

Appraisal of the preferred approach to development sites

Development site	Site 1 - Cedar Wood House	Site 2 - Goss Component	Site 3 - Ardleigh Works	Site 4 - Walthamstow Business Centre	Site 5 - Sterling House	Site 6 - Willow House	Site 7 - Wood Street Corner	Site 10 - Marlowe Road Estate	Site 12 - Brandon Road Car Park	Site 15 - Woodside School Car Park (Bridge Site)	Site 16 - Scout Hall and Church (former factory)	Site 17 - Dairy	Site 18 - Crownlea	Site 19 - Lucerne
Broad implications	↔	↗	↗	↗	↗	↗	↗	↔	↗	↗	↗	↗	↗	↗

- 14.5.5 All but two of the approaches to the **development sites** are expected to have positive implications on the economy objectives, with Sites 1 and 10 (Cedar Wood House and Marlowe Road Estate) predicted to have no implications on these objectives.

- 14.5.6 Although none of the approaches proposed for the **development sites** seek to designate additional land for solely employment generating uses, the **mixed-use / intensification approaches** proposed for Sites 2, 3, 4 and 5 will protect existing employment on site and offer the potential for increasing job creation through intensification of employment uses on site. The approaches to these sites also offer opportunities for housing growth which may **help to support Wood Street's town centre**, thus offering potentially positive implications for this objective.
- 14.5.7 Although the approach for Site 7 would not necessarily create employment uses on site, the preferred option seeks to bring the site back into use through the creation of residential development. This is expected to have some positive implications in terms of the economy objectives by helping to **support Wood Street's town centre** and in doing so, the **wider investment potential** of the **Wood Street area**.
- 14.5.8 Re-development of Sites 12 and 15 from car parks to residential (Site 12) and residential-led mixed use (Site 15) development should make better use of these sites and in doing so increase activity in the area which should help to **enhance the vitality and viability** of **Wood Street's town centre**.
- 14.5.9 It is notable that the residential-led mixed-use approaches for Sites 17, 18 and 19 may potentially reduce employment on these sites. However the balanced approach to the redevelopment of the sites, which seek to provide housing growth, is considered likely to **support local employment** as well as the **wider Wood Street economy and jobs** provided at this scale. In turn these approaches are expected to help to **support the vitality and viability of Wood Street town centre**; thus offering some positive implications for the local economy.

Summary

- 14.5.10 All bar one of **area-wide policies** considered are likely to improvements to the economy of the Wood Street area. Particularly **positive effects** are anticipated for Policy WS0 which is likely to deliver a pattern of development which exploits synergies and which develops the neighbourhood character of Wood Street, so boosting the economic viability of the area as a whole. The approach to employment areas set out in Policy WA8 is also likely to lead to **positive effects** as a result of its flexible approach which enables the creation of mixed-use schemes where appropriate and which will encourage small-medium enterprises (SME) and creative and cultural industries, so encouraging economic growth and diversification.
- 14.5.11 Beneficial effects are also anticipated as a result of coordinate development, which seeks wider improvements to the Wood Street area. Whilst these improvements may in some ways free development and so limit economic growth in some localised respects, the wider benefits of an attractive environment and of a reduction in existing problems, such as deprivation, should help to ensure that Wood Street appeals to businesses, shoppers, visitors and inward investors. A moderate degree of growth in housing is also expected to deliver growth whilst avoiding the creation of wider problems.
- 14.5.12 A single, potentially important **negative effect** is predicted, which relates to Policy WS2's town centre approach. This policy should bring about economic benefits as a result of its clear spatial strategy for the centre. However, it is notable that it also encourages the provision of a wider mix of units could result in a growth in larger retailers, which may in the mid-long term come to negatively impact the smaller businesses that currently dominate the town centre.

- 14.5.13 The approach to the **development sites** is expected to result in a number of **positive effects** in terms of the economy objectives. In particular the majority of the approaches are expected to result in **housing growth** across the Wood Street AAP area which should help to **support local employment** as well as the **wider Wood Street economy**.

14.6 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

Area-wide policy	Spatial approach to growth	WS3/4: Shopping	WS5: Placemaking	WS8: Housing Growth	WS9: Affordable Housing	WS12/13: Connections	WS17: Sustainability & Energy	WS18/19: Open Space & Nature	WS21/22: Employment
Broad implications	↗	↘	↗	↗	↗	↗	↔	↗	↗

- 14.6.1 The preferred spatial approach to growth in Wood Street (Policy WS0) sets out to optimise the use of opportunity sites, regardless of whether a site is within the town centre or outside. For instance, the ‘Local activity hubs’ this approach proposes could create **targeted sources of enterprise** and employment in areas of deprivation (wherever they might be), so increasing opportunities. In terms of growth, the increase in housing set out in Policy WS4a will lead to rise in Wood Street’s population. The moderate number of homes proposed through this policy may offer the least risk of the under-provision and decline of key social facilities as a result of **striking a balance** between the impact of development and the contributions it can make to such facilities and local employment. There are currently areas of housing deprivation in Wood Street and so Policy WS5 is of particular significance as it should help to ensure that, wherever **viable, affordable housing** is provided in the Wood Street area.
- 14.6.2 The approach to employment space in Wood Street set out in Policy WS8 will allow **mixed use development** on employment sites where development can demonstrate an adequate provision of employment space, and would seek to encourage developers to provide **community uses** as part of new development. As such, it should contribute to employment and the reduction of deprivation in the area. Wood Streets shopping areas are addressed in Policy WS2, which sets out a **clear spatial strategy** that may boost business activity, with a resulting increase in employment as a result of **higher levels of floorspace**. However, it should be noted that the provision of a **mix of units** (including larger sizes in greater numbers than at present) through this policy could result in a loss of the smaller businesses in the mid-long term with negative implications for employment and deprivation levels in the area.
- 14.6.3 The adoption of eight **placemaking principles** is proposed though Policy WS3. Whilst this may in some cases prevent the optimal use of sites for employment, so reducing the ability of new development to contribute towards tackling poverty, it is considered likely that the increased economic activity and associated reductions in deprivation resulting from **an improved public realm and townscape** will more than offset the disadvantages of the restrictions proposed. In addition the approach to open space provision set out through Policy WS7 will promote a balanced approach to the provision of public and private amenity space across Wood Street and so should **not constrain development** in a manner which affects levels of employment in the area.

Appraisal of the preferred approach to development sites

Development site	Site 1 - Cedar Wood House	Site 2 - Goss Component	Site 3 - Ardleigh Works	Site 4 - Walthamstow Business Centre	Site 5 - Sterling House	Site 6 - Willow House	Site 7 - Wood Street Corner	Site 10 - Marlowe Road Estate	Site 12 – Brandon Road Car Park	Site 15 – Woodside School Car Park (Bridge Site)	Site 16 – Scout Hall and Church (former factory)	Site 17 – Dairy	Site 18 - Crownlea	Site 19 - Lucerne
Broad implications	↗	↗	↗	↗	?	↗	↗	↗	↗	↗	↗	↗	↗	↗

- 14.6.4 The majority of the approaches to the development sites considered are expected to have positive implications for the employment and skills objectives.
- 14.6.5 Although the approach to Sites 1 – 4 will not necessarily result in an increase in employment uses on the sites, existing employment uses will be protected and opportunities for investment in business will be promoted, whilst allowing for housing growth that may help to support Wood Street town centre.
- 14.6.6 The mixed use redevelopment approach to Site 5 (Sterling House) may result in a combination of positive and negative implications in terms of the employment-related objectives. This is because the approach would result in the loss of employment generating uses on site however the redevelopment would incorporate a residential element which would result in an increase in local housing provision which would help to support local businesses and the Wood Street town centre.
- 14.6.7 The redevelopment approach to Site 7 (Wood Street Corner) should lead to the creation of new homes on what is currently a largely inactive site. This may potentially support local economic development and job creation, thus helping to tackle deprivation.
- 14.6.8 The comprehensive redevelopment approach to Site 10 (Marlowe Road Estate) is expected to lead to public realm improvements and to help create a more diverse social mix which is likely to help reduce local levels of deprivation thus having positive implications on the employment and skills objectives.
- 14.6.9 The approaches proposed for Sites 12 (Brandon Road Car Park), 15 (Woodside School Car Park (Bridge Site)), 17 (Dairy), 18 (Crownlea) and 19 (Lucerne) are expected to help tackle deprivation levels locally through the creation of new development on the sites. Not only will this create construction jobs which should lead to positive implications in the short term, but it will also provide new housing that should support the growth of the town centre in the longer term. The approach to Site 15 may have additional positive implications in terms of improving opportunities for access to education and training, although this is dependent on whether or not the education element of the development proposal comes forward.
- 14.6.10 The approach to Site 16 (Scout Hall and Church (former factory)) seeks the wholesale redevelopment of the site, which will involve the reconfiguration of the site's layout and demolition of the existing low grade buildings on site. This is expected to result in positive implications in terms of the employment-related objectives through providing new housing that should support the growth of the town centre, as well as re-provide the existing social/community infrastructure on site which should help to tackle local levels of deprivation.

Summary

- 14.6.11 The majority of the **area-wide policies** appraised score positively in terms of increasing employment levels and tackling deprivation in the Wood Street area. The optimal use of opportunity sites, regardless of whether a site is within the town centre or outside should help to ensure that targeted sources of enterprise and employment are created areas of deprivation (wherever they might be). As such, Policy WS0 is considered particularly likely to lead to **positive effects**. Policy WS5 is also considered to be of particular significance as it should help to ensure that, wherever viable, affordable housing is provided in the Wood Street area, with to **positive effects** in terms of reducing housing deprivation levels.

- 14.6.12 The balanced approach put forward by the preferred policies in relation to housing growth, placemaking principles, employment space, and open space provision should help to ensure that the benefits of new development are maximised, whilst the impacts of this growth on facilities and public spaces is mitigated through the range of targeted restrictions and conditions which must be met. As a result these alternatives are considered to have positive effects on both employment and deprivation levels.
- 14.6.13 A single, potentially important **negative effect** is predicted, which relates to Policy WS2's town centre approach. This policy should bring about economic and associated employment benefits as a result of its clear spatial strategy for the centre. However, it is notable that it also encourages the provision of a wider mix of units could result in a growth in larger retailers, which may in the mid-long term come to negatively impact the smaller businesses that currently dominate the town centre.
- 14.6.14 A number of the **Development Sites** propose mixed-use developments that will include employment generating uses by incorporating business or commercial space (i.e. Sites 1 - 4) and are therefore expected to have positive effects in terms of the **employment-related objectives**.
- 14.6.15 Several centrally located sites, including Sites 10 and 12, do not propose employment uses on site, however are nonetheless expected to create public realm improvements (such as secure by the design features and increased legibility) which may support economic activity and employment in the area and are therefore expected to have positive effects in terms of reducing deprivation levels in the Wood Street area.

14.7 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

Area-wide policy	Spatial approach to growth	WS3/4: Shopping	WS5: Placemaking	WS8: Housing Growth	WS9: Affordable Housing	WS12/13: Connections	WS17: Sustainability & Energy	WS18/19: Open Space & Nature	WS21/22: Employment
Broad implications	↗	↔	↔	↗	↗	↔	↔	↔	↗

14.7.1 The preferred approach to housing growth in Wood Street (WS4a) should allow sufficient scope to create homes at a density that makes the most out of the sites available, whilst not precluding the creation of the family homes that are required in the area. In addition, this alternative should provide sufficient flexibility to provide a **balanced mix of dwelling types** (as opposed to the single / twin bed properties likely to be driven by higher densities;

or mainly family units driven by a lower upper limit). This may aid developers when it comes to making the optimum use of sites and should therefore also improve viability. In terms of affordable housing, Policy WS4b should help to ensure that affordable housing is delivered in the area up to **targeted levels** wherever possible, so producing positive effects in terms of providing a mix of new dwellings. In addition, this policies flexibility should ensure that housing delivery is not unduly hindered by affordable housing levels.

14.7.2 The preferred spatial approach to growth (Policy WS0) should help to deliver sufficient housing in Wood Street by allowing for housing needs to be considered over the entire of the Wood Street area. This approach will provide developers with a greater degree of flexibility when selecting sites for housing and may facilitate the creation of a **range of tenures and dwelling sizes**. Flexibility is also a positive feature of employment Policy WS8. This approach will allow mixed-use development (including residential uses) to come forward on employment sites, where development can demonstrate adequate provision of employment space. As a consequence this is predicted to facilitate the creation of **additional residential space** on some employment land in Wood Street, thus having a positive effect in terms of addressing local housing needs.

14.7.3 The additional place-making and design criteria set out in the placemaking Policy WS3 could affect the viability of some forms of housing development and so could restrict the ability of new developments to meet Wood Streets housing need. Nonetheless, it should be noted that given the range of sites brought in the plan area, developers should have **sufficient options** available to deliver suitable housing despite design and placemaking restrictions. Policy WS3's approach to sustainability and energy would also place a requirement on developers to make a financial contribution to the creation of, and future connection to, the DEN scheme; but this requirement would not **be expected to result in viability implications**. In addition, the provision, enhancement and protection of open spaces and green infrastructure through Policy WS7 would require developer contributions, but is unlikely to negatively impact development viability.

Appraisal of the preferred approach to development sites

Development site	Site 1 - Cedar Wood House	Site 2 - Goss Component	Site 3 - Ardleigh Works	Site 4 - Walthamstow Business Centre	Site 5 - Sterling House	Site 6 - Willow House	Site 7 - Wood Street Corner	Site 10 - Marlowe Road Estate	Site 12 - Brandon Road Car Park	Site 15 - Woodside School Car Park (Bridge Site)	Site 16 - Scout Hall and Church (former factory)	Site 17 - Dairy	Site 18 - Crownlea	Site 19 - Lucerne
Broad implications	↗	↗	↗	↗	↗	↗	↗	↗	↗	↗	↗	↗	↗	↗

14.7.4 The approach proposed for 14 of the opportunity sites (as set out in the table above) should lead to the delivery of new housing as part of new development. This is expected to have positive implications in terms of supporting the achievement of the housing related objectives.

- 14.7.5 The proposals for Sites 12 and 15 would have positive implications for the area by making better use of the sites (both currently used for car parking) through **providing housing**. Both sites benefit from being located within close proximity to public transport, including the train station.

Summary

- 14.7.6 Several of the **area-wide policies** presented are predicted to result in positive effects in terms of housing. Of particular importance is Policy WS4b's approach to housing growth in Wood Street, which is expected to allow for the delivery of a balanced mix of dwelling types, so resulting in **positive effects**. The affordable housing Policy WS4b is also anticipated to result in **positive effects** due to its flexible delivery of affordable housing in a manner which will not affect development viability.
- 14.7.7 A balanced approach to growth in Wood Street, making best use of available sites wherever they might be, is advocated through Policy WS0. This is expected to have positive implications in terms of facilitating the creation of a range of tenures and dwelling sizes. The flexibility of Policy WS8 in relation to residential space employment land is also considered to be positive.
- 14.7.8 A number of the policies under consideration will place demands on developers. These include the place-making principles of Policy WS3; the energy network requirements of Policy WS3; and the open space contributions of Policy WS7. However, these approaches are not considered likely to have a notable impact on development viability, and so their effect is considered to be neutral.
- 14.7.9 Through proposing new residential development, the approaches to all **14 development sites** considered are expected to support the housing objectives. Collectively the approach to these sites is predicted to have **positive effects** on the baseline and make a substantial contribution to the housing targets within the Wood Street AAP boundary.

14.8 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
- 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

Area-wide policy	Spatial approach to growth	WS3/4: Shopping	WS5: Placemaking	WS8: Housing Growth	WS9: Affordable Housing	WS12/13: Connections	WS17: Sustainability & Energy	WS18/19: Open Space & Nature	WS21/22: Employment
Broad implications	↗	↗	↗	↔	↗	↗	↔	↗	↗

14.8.1 The spatial approach to growth set out through Policy WS0 looks to optimise development opportunities, with new uses and activities to take place in appropriate locations. The **promotion of such synergies** may help to boost health and wellbeing (for instance from concentrating residential developments next to greenspace). This Policy could also offer a high degree of provision and access to community facilities though this optimal use approach (for instance by concentrating residential development in order to make viable a community facility, or next to an existing under used facility). In addition, access to **improve access** to health and social services, and the wider community, for those with mobility concerns may be

supported by the design and placemaking principles of Policy WS3. Access to the Wood Street area via sustainable transport is also to be encouraged through Policy WS5 which may lead to health and wellbeing benefits as a result of **reduced car use**.

14.8.2 Growth in housing numbers, along with corresponding growth in the size of Wood Street’s population, has the potential to influence health and wellbeing in the area. The housing growth Policy WS4a may offer the least risk of the under-provision and decline of **key social facilities and open spaces** that might occur as a result of increased population pressure. This is due to the moderate population increase it may bring about and the viability of the density proposed. In addition, the affordable housing Policy WS4b should **minimise the risk of displacement** and negative effects on wellbeing that an under provision of affordable housing can result in as a result of an approach which will seek to provide appropriate levels of affordable housing wherever possible.

14.8.3 The preferred approach to open space provision, protection and enhancement in the Wood Street Area (Policy WS7) should result in increased opportunities for informal and formal **sports and recreation activities** and will also seek to improve the accessibility to Epping Forest potentially leading to improved health and wellbeing for local people. In addition, the approach set out in Policy WS8 encourages developers to provide **community uses** as part of new development, which may support wellbeing. Similar wellbeing gains are possible as a result of Policy WS2 which looks to provide for a wide variety of uses in Wood Street shopping areas, with the secondary shopping area being able to support entertainment, leisure, recreational and social uses.

Appraisal of the preferred approach to development sites

Development site	Site 1 - Cedar Wood House	Site 2 - Goss Component	Site 3 - Ardleigh Works	Site 4 - Walthamstow Business Centre	Site 5 - Sterling House	Site 6 - Willow House	Site 7 - Wood Street Corner	Site 10 - Marlowe Road Estate	Site 12 – Brandon Road Car Park	Site 15 – Woodside School Car Park (Bridge Site)	Site 16 – Scout Hall and Church (Former factory)	Site 17 – Dairy	Site 18 - Crownlea	Site 19 - Lucerne
Broad implications	↔	↔	↔	↔	↗	↗	?	↔	↗	↗	↗	↔	↗	↔

14.8.4 The approach proposed for half of the **development sites** considered is not expected to result in any implications in terms of the human health-related objectives. The approach proposed for a further six of the development sites is expected to lead to positive implications in terms of the health and wellbeing of Wood Street’s residents.

14.8.5 The mixed-use approaches to development at Sites 5 and 6 may help to reduce the need to travel for employment and services, so **potentially reducing the use of transport and the emissions** that can be associated with it.

- 14.8.6 The implications on the health and wellbeing of residents as a result of the approach proposed for Site 7 are uncertain. Although the housing element of the approach is expected to result in **housing growth** which may potentially support local economic development and job creation, thus helping to **tackle deprivation**, the extent of the approach's ability to increase provision and access to community facilities in the area is unclear. Should the ground floor use taken forward as part of this approach comprise of community or social infrastructure, the approach is expected to have greater positive implications on the health and wellbeing of local people.
- 14.8.7 The wholesale redevelopment approaches proposed for Sites 12 and 15 from car parking to residential uses would lead to a reduction in car parking provision. As these sites are located in relatively close proximity to public transport including the train station, it is expected that development at these locations should lead to an increase in walking and cycling. This in turn should help to **limit car use** for short journeys, and **reduce associated greenhouse gas emissions** in the area.
- 14.8.8 Although the redevelopment approach for Site 16 is not expected to increase provision of access to community facilities, it is likely to result in an improvement in the quality of existing social/community infrastructure provision through the creation of a purpose built social/community use, and is therefore predicted to have positive effects in terms of the **health and wellbeing** of residents in the Wood Street area.
- 14.8.9 The comprehensive redevelopment of Site 18 is most likely to **maximise access to the open space** adjoining the rear of the area, with a link to be explored along the site's eastern boundary. Access to such space could result in positive effects in terms of the health and wellbeing of those in the locality.

Summary

- 14.8.10 The majority of the **area-wide policies** are expected to have positive implications for health and wellbeing, with the remaining policies expected to have a neutral effect. Of particular importance is the open space and nature Policy WS7 which should lead to increased recreational opportunities, with **positive effects**. The enhancement of local facilities may occur through Policy WS8's promotion of community uses in new development, which has the potential to result in **positive effects** on wellbeing.
- 14.8.11 Whilst growth in housing numbers could negatively impact health and wellbeing in the area, the housing growth Policy WS4a may offer the least risk of the under-provision and decline of key social facilities and open spaces. It is therefore considered likely to have neutral implications. In addition, the provision, where possible, of appropriate levels of affordable housing should have positive wellbeing implications (Policy WS4b).
- 14.8.12 The spatial approach to growth set out through Policy WS0 may help to ensure that synergies capable of boosting health and wellbeing are exploited. Access to Wood Street via sustainable transport is also expected to result in **positive effects** on health, with Policy WS5 considered likely to reduce car use. Health and wellbeing gains resulting from improved access are also expected as a result of the placemaking principles of Policy WS3.
- 14.8.13 All of the approaches to the **development sites** considered are either expected to have no implications on the human health objectives, or **positive implications**. In particular the **mixed-use approaches** to development of Sites 5 and 6 may potentially **reduce the use of transport and associated**

greenhouse gas emissions. In addition, the **redevelopment approaches** for Sites 12 and 15 are expected to result in a decline in car parking provision which in turn is predicted to **reduce car use** and associated **greenhouse gas emissions** in the area.

14.9 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

Area-wide policy	Spatial approach to growth	WS3/4: Shopping	WS5: Placemaking	WS8: Housing Growth	WS9: Affordable Housing	WS12/13: Connections	WS17: Sustainability & Energy	WS18/19: Open Space & Nature	WS21/22: Employment
Broad implications	↗	↔	↗	↔	↔	↔	↗	↗	↗

14.9.1 The preferred spatial approach set out in Policy WS0 proposes an approach to redevelopment that is guided by flexible, planned interventions that look to **meet plan objectives** (including green infrastructure provision), and to guide significant developments to the **most sustainable locations**. As a result this approach is most likely to lead to the provision of new open space where required, improvements in open spaces, and the protection of such spaces from excessive use. In addition, this approach is likely to ensure that redevelopment activities **do not result in direct or indirect impacts** on the heritage assets in the plan area by directing significant development into the most sustainable locations.

- 14.9.2 In terms of the historical environment, the employment Policy WS8 seeks to ensure that employment proposals protect local amenity, have **no significant adverse impact** on the historic environment, and will require all employment developments to be of a high quality design. In addition the approach to sustainability and energy set out in Policy WS6 prescribes high environmental and sustainable **design requirements** and so is expected to provide a high quality townscape where new development takes place.
- 14.9.3 The placemaking Policy WS3 is likely to result in open spaces areas that are both **appropriately maintained and enhanced**. This is a result of a coordinated approach to improving accessibility in the Wood Street area, including its open space, whereby greater use is likely to lead to spaces that are cared for rather than neglected. Whilst greater accessibility could result in some negative consequences a holistic approach to providing access is likely to be capable of managing such issues. The balanced approach to the provision of public and private open space set out by Policy WS7 is also expected to lead to benefits as new developments will be required to provide **high quality communal gardens and private open spaces**, particularly in areas in the southern and northern part of Wood Street where there are known shortfalls. Policy WS4a meanwhile will seek to bring about a moderate level of housing growth, and so could lead to under provision of open space in terms of both area and quantity. However, there is the potential for **developer contributions** to be used to improve open space quality and provision in Wood Street and so the effect of this policy is deemed likely to be neutral.

Appraisal of the preferred approach to development sites

Development site	Site 1 - Cedar Wood House	Site 2 - Goss Component	Site 3 - Ardleigh Works	Site 4 - Walthamstow Business Centre	Site 5 - Sterling House	Site 6 - Willow House	Site 7 - Wood Street Corner	Site 10 - Marlowe Road Estate	Site 12 - Brandon Road Car Park	Site 15 - Woodside School Car Park (Bridge Site)	Site 16 - Scout Hall and Church (former factory)	Site 17 - Dairy	Site 18 - Crownlea	Site 19 - Lucerne
Broad implications	↗	↔	↔	↔	↗	↗	↗	↔	↗	↗	↔	↔	↔	↘

- 14.9.4 The proposed approach to Site 1 (Cedar Wood House), which contains a locally listed building, is considered to be a strong approach that will result in significant positive implications in terms of **enhancing Wood Street’s historic environment**. This is due to the policy’s focus on **refurbishing and retaining Cedar Wood House in a sensitive manner**.
- 14.9.5 The proposed approach to Site 5 (Sterling House) is expected to **make better use of the site** than the current use and layout by intensifying the uses, reducing the amount of car parking and activating the site’s frontage. As such the approach is considered likely to result in significant positive effects in terms of the townscape-related objectives.

- 14.9.6 The proposed approach to Site 6 (Willow House) is expected to facilitate the creation of a new gateway development that should **enhance the appearance of the surrounding area**, including the Wood Street Library, a locally listed building adjacent to the site, thus making a positive contribution to the townscape related objectives.
- 14.9.7 The proposed approach to Site 7 (Wood Street Corner) seeks to **bring this prominent brownfield site back into use**. The approach is expected to result in the creation of an **active site frontage** and the redevelopment will require to be of the highest urban **design quality** in order to preserve and respond sensitively to the Wood Street library; as such, by **enhancing the surrounding historic built environment**, the approach is considered likely to result in positive implications in terms of the townscape-related objectives.
- 14.9.8 The proposed approach to Sites 12 (Brandon Road Car Park) and 15 (**Woodside School Car Park (Bridge Site)**) seeks to **bring more active uses** onto the sites. Creating a more active use (residential) on these centrally located sites is expected to have positive implications in terms of the townscape-related objectives.
- 14.9.9 The proposed approach to Site 19 (Lucerne) **may result in the loss of buildings** at the front of the site that are not listed, but which do have townscape value. This may have some negative implications in terms of the townscape-related objectives. However, it is notable that opportunities for the maintenance of these buildings are to be explored as an element of any development proposal coming forward through this approach.

Summary

- 14.9.10 Five of the **area-wide policies** brought forward are considered likely to positively influence Wood Street's landscape and townscape, with the remaining policies likely to result in a neutral effect. The preferred spatial approach of WS0 is considered to be a positive approach given its focus on meeting plan objectives (including green infrastructure) and guiding development to the most sustainable locations.
- 14.9.11 The historical environment will be protected through the employment Policy WS8 which aims to ensure that employment proposals protect local amenity, have no significant adverse impact on the historic environment, and feature good design. A focus on good design is also set out in the approach to sustainability and energy (Policy WS6) which prescribes high environmental and sustainable design requirements.
- 14.9.12 Wood Street's open spaces will be influenced by a number of policies. The placemaking Policy WS3 is likely to result in open spaces areas that are both appropriately maintained and enhanced as a result of its coordinated approach to improving accessibility. A balanced approach to the provision of public and private open space set out by Policy WS7 is also expected to lead to benefits. Policy WS4a will seek to bring about a moderate level of housing growth, with potential impacts on open spaces, although there is the potential for developer contributions to be used to improve such spaces.
- 14.9.13 The majority of the approaches to the **development sites** are expected to have either positive implications or no implications in terms of the landscape and townscape objectives.
- 14.9.14 The approach to Site 1 (Cedar Wood House) would seek the retention and refurbishment of a locally listed built heritage asset as part of any redevelopment scheme which should have significant **positive effects** in terms of the townscape objectives.

14.9.15 The approach for one of the development sites (Site 19 – Lucerne) is considered to have the potential to give rise to **negative implications** in terms of the townscape objectives. This is because the comprehensive redevelopment approach may result in the loss of buildings at the front of the site that have townscape value. However it is notable that opportunities for the maintenance of these buildings are to be explored as an element of any development proposal coming forward through this approach.

14.10 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

Appraisal of the preferred approach to area-wide policy

Area-wide policy	Spatial approach to growth	WS3/4: Shopping	WS5: Placemaking	WS6: Housing Growth	WS9: Affordable Housing	WS12/13: Connections	WS17: Sustainability & Energy	WS18/19: Open Space & Nature	WS21/22: Employment
Broad implications	↗	↔	↔	↔	↔	↗	↔	↔	↔

14.10.1 The preferred spatial approach set out in Policy WS0 looks to optimise the development of opportunity sites, including bringing forward significant development in the most sustainable locations (wherever they are found in the plan area), so maximising opportunities to promote sustainable transport, such as those that can result from **mixed use development**. Improvements to the transport system are also anticipated as a result of the

connections Policy WS5. By seeking to improve the legibility and connectivity of new streets and by requiring new streets to be designed in a way that would **prioritise pedestrians and cyclists** (i.e. through the creation of Home Zones), this approach will provide increased opportunities for access to local services, facilities and employment.

14.10.2 Housing growth may result on impacts upon Wood Street’s existing transport system as a result of population growth. Policy WS4a with its moderate housing density proposal should help to make best use of **existing transport capacity**, whilst also providing **scope for improvements** as a result of financial contributions from developers. Therefore it is considered likely that this policy will result in a neutral effect in terms of transport.

Appraisal of the preferred approach to development sites

Development site	Site 1 - Cedar Wood House	Site 2 - Goss Component	Site 3 - Ardleigh Works	Site 4 - Walthamstow Business Centre	Site 5 - Sterling House	Site 6 - Willow House	Site 7 - Wood Street Corner	Site 10 - Marlowe Road Estate	Site 12 - Brandon Road Car Park	Site 15 – Woodside School Car Park (Bridge Site)	Site 16 - Scout Hall and Church (former factory)	Site 17 – Dairy	Site 18 - Crownlea	Site 19 - Lucerne
Broad implications	↗	↗	↗	↗	↗	↗	↔	↗	↗	↗	↗	↗	↗	↔

14.10.3 The mixed use approach incorporating residential uses proposed for Site One (Cedar Wood House) should ensure that there are opportunities for at least some access to services through sustainable transport, so **potentially limiting car use and associated greenhouse gas emissions**. The level of residential development proposed for the site also takes into account the London Plan Density Matrix’s suggested appropriate density given the area’s PTAL level; this should further help to **prevent increased greenhouse gas emissions as a result of congestion and increased car use**, thereby having positive implications in terms of the transport objectives.

14.10.4 By pursuing a mixed-use approach to development, Sites Two (Goss Component), Three (Ardleigh Works), Four (Walthamstow Business Centre), Five (Sterling House), 17 (Dairy) and 18 (Crownlea) may **help to reduce the need to travel for employment and services**, so potentially reducing the use of transport and the emissions that can be associated with it.

14.10.5 The approaches to Sites Five and Six propose the wholesale redevelopment of the sites which would seek to reduce the extent of surface car parking; a reduction in car parking provision should help to **limit car use and associated greenhouse gas emissions**, thus having positive implications in terms of the transport objectives.

14.10.6 The comprehensive redevelopment approach to Site 10 (Marlowe Road) is expected to result in positive implications in terms of the transport objectives as a result of public realm improvements, such as **increased permeability**, which may help to increase walking and cycling.

- 14.10.7 The redevelopment approaches to Sites 12 and 15 from car parks to residential / residential-led mixed use developments should result in a **reduction in the number of cars and car usage** in the Wood Street area AAP.
- 14.10.8 Finally, the comprehensive redevelopment approach proposed for Site 16 (Scout Hall and Church (former factory)), which is a centrally located site in close proximity to the train station, seeks to reduce the extent of car parking currently on the site which should help to **limit car use and associated greenhouse gas emissions** in the area thus creating positive implications in term of the transport objectives.
- Summary
- 14.10.9 Of the **area-wide policies** brought forward, two are expected to have positive implications for Wood Street's transport system. Particularly **positive effects** are predicated for connections Policy WS5. Which seeks to improve the legibility and connectivity of new streets, and which requires new streets to be designed in a way that prioritises pedestrians and cyclists. The spatial approach set out in Policy WS0 is also likely to maximise opportunities to promote sustainable transport.
- 14.10.10 Whilst housing growth could negatively affect Wood Street's transport system as a result of increased population leading to over demand, the moderate levels of housing growth proposed through Policy WS4a should help to make best use of existing transport capacity whilst also providing scope for improvements as a result of financial contributions from developers. As a result, the effect of this policy is expected to be neutral.
- 14.10.11 The majority of the **development sites** are likely to have **positive implications** for the transport objectives. This is due to many of the approaches promoting mixed-use development which may help to reduce the need to travel for employment and services, so potentially reducing the use of transport and greenhouse gas emissions. In addition the approach to Sites 5, 6, 12 and 15 seeks to reduce car parking provision which should help to limit car use and associated greenhouse gas emissions.

14.11 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	Spatial approach to growth	WS3/4: Shopping	WS5: Placemaking	WS8: Housing Growth	WS9: Affordable Housing	WS12/13: Connections	WS17: Sustainability & Energy	WS18/19: Open Space & Nature	WS21/22: Employment
Broad implications	↗	↔	↔	↔	↔	↔	↗	↔	↔

14.11.1 The preferred spatial approach to growth set out in Policy WS0 may help to reduce waste production and encourage recycling by focusing new development and rationalising existing land uses in a manner which could make the most of existing **recycling facilities**, or which could support the creation of such facilities. Careful consideration of the positioning of developments could also maximise the potential for **industrial symbiosis**²⁶, so reducing the waste of resources. In addition, the sustainability and energy Policy WS6 will look to make use of **energy that what would otherwise be waste heat** and so is expected to have positive effects on this objective.

²⁶ Industrial symbiosis can be defined as the sharing of services, utility, and by-product resources among diverse actors in order to add value, reduce costs and improve the environment.

Appraisal of the preferred approach to development sites

Development site	Site 1 - Cedar Wood House	Site 2 - Goss Component	Site 3 - Ardleigh Works	Site 4 - Walthamstow Business Centre	Site 5 - Sterling House	Site 6 - Willow House	Site 7 - Wood Street Corner	Site 10 - Marlowe Road Estate	Site 12 - Brandon Road Car Park	Site 15 - Woodside School Car Park (Bridge Site)	Site 16 - Scout Hall and Church (Former factory)	Site 17 - Dairy	Site 18 - Crownlea	Site 19 - Lucerne
Broad implications	↔	↔	↔	↔	↔	↔	↔	↗	↔	↔	↔	↔	↔	↔

- 14.11.2 All but one of the **14 development sites** considered is expected to have no implications on the waste objective, though the creation of new development could lead to an **increase in the production of waste** from homes and businesses. However, such developments may also present an opportunity to incorporate facilities that **enable easy recycling and waste management**, as set out by Policy WS6.
- 14.11.3 The comprehensive redevelopment approach to Site 10 (Marlowe Road Estate) offers the opportunity to plan for future change by designing in measures to improve resource efficiency so may have positive implications in terms of the waste.

Summary

- 14.11.4 Of the **area-wide policies** under consideration, two are considered to have positive implications in terms of reducing production of waste and increase recycling in the Wood Street area. The preferred spatial approach to growth set out in Policy WS0 may help to reduce waste production and encourage recycling by focusing new development in a manner which could support recycling facilities and industrial symbiosis. In addition, the sustainability and energy Policy WS6 looks to make use of energy that what would otherwise be waste heat.
- 14.11.5 All but one (Site 10) of the **14 development sites** considered is expected to have no implications on the waste objective, although the creation of new development could lead to an **increase in the production of waste** from homes and businesses. However, such developments may also present an opportunity to incorporate facilities that **enable easy recycling and waste management**, as set out by Policy WS6.

15 CONCLUSIONS AT THIS CURRENT STAGE

15.1 Balanced approach to growth

- 15.1.1 The Wood Street area is one of four key growth areas identified in Waltham Forest's Core Strategy for delivering growth and change in the Borough. Although Wood Street benefits from a relatively successful town centre with a unique offer of shops, it also contains some very deprived neighbourhoods and several underutilised sites.
- 15.1.2 The AAP seeks to consolidate existing uses together with provision of additional complementary retail, commercial, social and cultural activities to support the vitality and vibrancy of the town centre and support the anticipated growth for Wood Street. In doing so the AAP sets out a balanced approach to growth across the AAP area which will encourage growth at a number of sites across the area, whilst recognising the need to strengthen the town centre by consolidating town centre uses and activities.
- 15.1.3 In terms of housing, the AAP identifies the need to deliver up to 1000 new houses in the Wood Street area over the 15 year plan period (WS4a – Housing Growth). The majority of new housing will be accommodated on the 18 development sites identified in the AAP, many of which will come forward as part of mixed-use developments. The preferred spatial approach to growth should help to deliver sufficient housing in Wood Street by allowing for housing needs to be considered over the entire Wood Street area. This approach will provide developers with a greater degree of flexibility when selecting sites for housing and may facilitate the creation of a range of tenures and dwelling sizes which should ensure consistency with the housing policies set out in the Adopted Core Strategy and the Emerging Development Management Policies DPD.
- 15.1.4 The additional place-making and design criteria set out in the AAP (Policy WS3) could potentially affect the viability of some forms of housing development and so could restrict the ability of new developments to meet Wood Street's housing need. However it is considered that given the range of development sites in the plan area, developers should have sufficient options available to deliver suitable housing despite design and placemaking restrictions.

15.2 Protecting and enhancing the built and natural environment

- 15.2.1 The AAP recognises the importance of protecting and enhancing the area's built and natural heritage assets. In doing so it sets out a number of policy measures that should enhance and protect Wood Street's valued historic buildings and open spaces and biodiversity.
- 15.2.2 In terms of the historic environment, Policy WS8 (Employment) seeks to ensure that employment proposals protect local amenity, have no significant adverse impact on the historic environment, and will require all employment developments to be of a high quality design. In addition, Policy WS6 (Sustainability and Energy) prescribes high environmental and sustainable design requirements and so is expected to provide a high quality townscape where new development takes place. In terms of the development sites, the approach to Site One (Cedar Wood House) seeks development proposals to refurbish and retain the locally listed building in a sensitive manner which should help ensure the protection and

enhancement of this locally valued building. The approaches for Sites Six and Seven are also expected to have a positive effect in terms of Wood Street's historic environment, as redevelopment on these sites will be required to be of the highest urban design quality in order to preserve and respond sensitively to the Wood Street library.

- 15.2.3 With regards to the natural environment, Policy WS7 (Open Space and Nature) looks to enhance existing green infrastructure and protect open space, whilst managing access to Epping Forest. Policy WS3 (Placemaking) is also likely to result in open spaces areas that are both appropriately maintained and enhanced as a result of its coordinated approach to improving accessibility. A balanced approach to the provision of public and private open space set out by Policy WS7 is also expected to lead to benefits. Policy WS4a will seek to bring about a moderate level of housing growth, with potential impacts on open spaces, although there is the potential for developer contributions to be used to improve such spaces.

15.3 Key development sites

- 15.3.1 Eighteen development sites are identified within the AAP area for a range of uses including housing, employment, community/social infrastructure and commercial. The delivery of these sites is expected to contribute towards: meeting housing targets in the AAP area; reducing deprivation levels; reducing car dependency / the need to travel and associated greenhouse gas emissions; supporting economic activity and providing employment opportunities.

15.4 Overall conclusion

- 15.4.1 The policies and development sites brought forward in the AAP will contribute towards tackling key issues present within the Wood Street area. New residential, mixed-use and employment-led sites will be created to provide new housing and employment opportunities in the area. In particular proposals to bring inactive / vacant sites in central locations back into use through redevelopment and proposals to improve the public realm will play a key role in enhancing the vitality and viability of the town centre. 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.

16 RECOMMENDATIONS AT THIS CURRENT STAGE

16.1.1 Only one recommendation is made at this stage. The recommendation will be taken into account when preparing the Proposed Submission version of the plan (alongside appraisal findings more generally, and representations received).

Recommendation	To ensure performance of the plan is maximised in terms of ...
<p>The wording of Policy WS2 should be strengthened / clarified in order to explain what measures will be taken to ensure that this approach does not result in the significant growth of larger retailers in the town centre, which could potentially negatively impact upon the smaller businesses that play a key role in enhancing the character and USP of the town centre.</p>	<p>Objective 21 - Maintain and enhance the vitality and viability of the Borough's town centres</p>

PART 4: WHAT ARE THE NEXT STEPS (INCLUDING MONITORING)?

17 INTRODUCTION (TO PART 4)

The SA Report must include...

- A description of the measures envisaged concerning monitoring

17.1.1 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.

18 PLAN FINALISATION, ADOPTION AND MONITORING

18.1.1 Following consultation on the Preferred Options Consultation Document the Council will prepare the Proposed Submission AAP, taking into account consultation responses and the findings of this SA Report (as well as any other new sources of evidence that emerge).

18.1.2 The Proposed Submission AAP will then be 'Published' so that final representations can be made. It is the intention that the AAP will then be 'Submitted' (alongside representations received) for consideration by an Independent Planning Inspector at an 'Examination in Public'.

18.1.3 At the time of Adoption a 'Statement' must be 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**.

18.1.4 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.

18.1.5 The following is suggested:

- The SA has identified a number of positive impacts in relation to residential development in and close to the town centre. The amount of new **housing** delivered within the AAP area could be a focus for monitoring going forward.
- The SA has identified a potential negative impact in relation to the **potential growth of large retailers** in the town centre, which could have potentially detrimental impacts in terms of the provision of smaller businesses that play a key role in contributing to the vitality and viability of the town centre. The diversity and mix of businesses in the town centre could be a focus for future monitoring.
- 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 Wood Street AAP area with a view towards boosting the local economy and creating new job opportunities.
- The SA has identified a number of positive impacts in relation to the plan's potential to **reduce car dependency and greenhouse gas emissions**. The Council may wish to monitor the transport choices taken by new and existing residents.

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

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

Table 2: Interpreting regulatory requirements

<u>Interpretation of the requirements (as presented in Table 1, above)</u>	<u>Requirements of Schedule 2 of the Regs (the report must include...)</u>
An outline of the contents, main objectives of the plan	(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;
The relationship of the plan with other relevant plans and programmes	(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan
The environmental protection objectives, established at international or national level, relevant to the plan	(c) the environmental characteristics of areas likely to be significantly affected;
The relevant aspects of the current state of the environment	(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;
The environmental characteristics of areas likely to be significantly affected	(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;
The likely evolution [of the baseline] without implementation of the plan	(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;
Any existing environmental problems / issues which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;
An outline of the reasons for selecting the alternatives dealt with	(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
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.	(i) a description of the measures envisaged concerning monitoring.
The likely significant effects on the environment associated with the draft plan	
The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan	
A description of the measures envisaged concerning monitoring	

APPENDIX II: ALTERNATIVES APPRAISAL (SPATIAL 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 approaches to 'spatial growth':

1. A balanced approach, encouraging growth at a number of sites across the AAP area, while recognising the need to consolidate town centre uses and activities
2. Dispersed growth - with growth at locations where redevelopment opportunities exist
3. Town centre focused growth

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 Preferred Options Consultation Document.

Methodology

For each of the alternatives, the appraisal identifies and evaluates 'likely significant effects' on the baseline / likely future baseline, drawing on the sustainability issues 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.²⁷

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.²⁸ 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.

²⁷ As stated by Government Guidance (The Plan Making Manual, see <http://www.pas.gov.uk/pas/core/page.do?pagelid=156210>):

"Ultimately, the significance of an effect is a matter of judgment and should require no more than a clear and reasonable justification."

²⁸ Environmental Assessment of Plans and Programmes Regulations 2004

Appraisal findings

Table presenting an appraisal of the following ‘Affordable Housing Proportion’ options:

- (1) Balanced approach to growth
- (2) Dispersed growth option
- (3) Town centre focused growth option

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	No significant effects are predicted for any of the alternatives presented. In terms of the relative merits of the alternatives, a balanced approach to growth, as set out through Option One , should help to deliver sufficient housing in Wood Street through an approach which allows for housing needs to be considered over a wider area (when compared to the other alternatives). As such, a balanced approach will provide developers with a greater degree of flexibility when selecting sites for housing. This choice may facilitate the creation of a range of tenures and dwelling sizes. In contrast, Option Three may provide a more limited selection of sites, as residential development is restricted to areas outside of the town centre boundary. This may result in reduced choices in terms of site (which could limit development size), and as a result of localised considerations, such as townscape (which may limit development type, for example height restrictions reducing the opportunities to create higher density apartment buildings). Finally, Option Two’s dispersed approach may fail to deliver enough housing to meet local needs. Whilst a recent market review points to continuing demand for residential properties in the Wood Street plan area, a dispersed, market driven approach is likely to deliver such properties in an ad-hoc manner. This may result in lower concentrations of residential development, so reducing the opportunities to create new infrastructure, services and facilities which may in turn drive further residential growth. This is in comparison to Option One , which sets out to optimise development opportunities through planned intervention.	★ 1	2	2
2. Reduce crime and the fear of crime	Whilst no significant effects are anticipated for any of the alternatives put forward, their relative merits can be discussed. In particular, Option Three is likely to offer the least advantage in terms of reducing crime and the fear of crime in the Wood Street area. This is due to the concentration of residential uses outside of the town centre proposed by this approach. By limiting residential development to these areas, the town centre is likely to be comparatively unoccupied and unwatched at times outside of normal business operating hours. Furthermore, residential areas are liable to be under occupied whilst residents are at work. By providing greater opportunity for a mix of development type, Options One and Two are more likely to create a continuous ‘street life’ that may act as a deterrent to crime and a reassuring	★ 1	★ 1	2

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
	presence that could reduce the fear of crime.			
3. Improve standard of health and wellbeing of those who live and work in the Borough	There are no significant effects predicted for any of the alternatives. In terms of the relative merits of the alternatives, Option Two offers perhaps the least potential to improve the health and wellbeing of those in the locality. This is as a result of the market led approach proposed by this alternative, which could result in ad-hoc development which is incapable of supporting new infrastructure, services and facilities which could help to improve health and wellbeing (for instance as a result of insufficient density). In contrast, Option One looks to optimise development opportunities, with new uses and activities to take place in appropriate locations. The promotion of such synergies may help to boost health and wellbeing (for instance from concentrating residential developments next to greenspace). Option Three also offers the opportunity to plan for health and wellbeing gains, and could potentially facilitate greater provision of social and health infrastructure than Option One due to its focus on concentrating residential development and related social infrastructure outside of the town centre (so potentially improving the viability of such services). However, local, non-town centre employment and activity hubs would not be supported through this approach, which may in turn affect wellbeing (for example by reducing the street activity and meeting places that local shops can provide). As a result, Option One is preferred as it could address more widely the determinants of wellbeing and health through an optimised, balanced approach.	★ 1	3	2
4. Increase the provision of and access to community facilities to meet local cultural, recreational and social needs	No significant effects are predicted for any of the alternatives put forward. Their relative merits can, however, be discussed. Option One could offer a high degree of provision and access to community facilities. This is as a result of an approach which favours the optimal use of available development space, which could help to create the enabling conditions for such facilities (for instance by concentrating residential development in order to make viable a community facility, or next to an existing under used facility). This is important given that community facilities in the plan area are currently dispersed in a manner which is believed to result in the underutilisation. Option Three also offers the opportunity to increase and improve social facilities, particularly given the proposed concentration of residential uses and social infrastructure outside of the town centre, which may help support the viability of such services. However, the restriction of employment uses to the town centre under this alternative may reduce the street life, employment options and the number of social meeting places in residential areas, so failing to meet these aspects of social need. Finally, Option Two is likely to be the weakest of the alternatives in terms of this sustainability objective. This is due to the dispersed, market led approach proposed, which may lead, for instance, to concentrations of residential uses that are too low to support additional social infrastructure.	★ 1	3	2

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
5. Improve educational attainment in schools	No implications.	-	-	-
6. Improve opportunities for access to education and training for all residents	No implications.	-	-	-
7. Reduce the overall level of deprivation	<p>Whilst all of the alternatives presented are likely to help tackle deprivation as a result of redevelopment activity, Option Two is likely to result in the lowest reduction. The market led approach set out in this alternative may result in development which is focused on those parts of the plan area that are currently least deprived (and so have highest value), and which is not brought forward in a manner which maximises the opportunities for wider benefits (such as additional services, infrastructure and facilities). This approach may also continue to replicate existing spatial patterns that have failed to promote vitality and viability in the town centre area in the past, such as a linear distribution of retail and commercial activities along the main Wood Street transport corridors. In contrast, Option Three looks to consolidate employment uses within the town centre area, so creating a strong cluster of town centre uses and activities. This may help to increase economic activity and employment in this centre, with associated decreases in deprivation in the Wood Street area. However, this approach could miss potential opportunities to reduce deprivation by restricting redevelopment to the town centre when the optimal economic and/or socially beneficial location may be outside of this area.</p> <p>Option One sets out to optimise the use of opportunity sites, regardless of whether a site is within the town centre or outside. For instance, the 'Local activity hubs' proposed through Option One could create targeted sources of enterprise and employment in areas of deprivation (wherever they might be), so increasing the opportunities available to those living in the locality. Given that Waltham Forest ranks as the 15th most deprived of 326 local authorities in England (with a declining position in recent years), and the Wood Street Ward ranked 79th (of 627) most deprived within London in 2010, taking best advantage of the benefits of new development in the plan area in this manner could result in a significant positive effect against the baseline.</p>	★ 1	3	2

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
8. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system	Whilst none of the alternatives are predicted to result in significant effects for this sustainability objective, their relative merits can be discussed. Option One is considered to be the preferred approach in this instance. This is due to an approach which looks to optimise the development of opportunity sites, including bringing forward significant development in the most sustainable locations (wherever they are found in the plan area). This is in contrast to Option Three , which primarily looks to guide development on the basis of its use (residential or employment), regardless of additional considerations. This may result in missed opportunities, such as the increases in sustainable transport use that can result from mixed use development that allows for shops and services to be reached easily by foot or by cycle. This alternative does however look to concentrate social infrastructure alongside concentrated residential development, and so could improve access to some local services (although also potentially reducing accessibility to those working in the town centre). Meanwhile, Option Two may not result in a development pattern which supports sustainable access to services and employment. This is due to the uncertainties inherent in a market led approach to redevelopment, with a variety of actors optimising land use according to their individual requirements as opposed to an integrated approach taking into account transport considerations.	★ 1	3	2
9. Reduce production of waste and increase recycling	None of the alternative presented are predicted to have a significant effect on the baseline. In terms of their relative merits, Option One may help to reduce waste production and encourage recycling by focusing new development and rationalising existing land uses in a manner which could make the most of existing recycling facilities, or which could support the creation of such facilities. Careful consideration of the positioning of developments could also maximise the potential for industrial symbiosis ²⁹ , so reducing the waste of resources. Option Three could also present an opportunity for the creation of recycling facilities and for industrial symbiosis as it looks to concentrate residential and commercial development. These types of development are likely to produce similar types of waste arisings in similar patterns, so allowing for specialised collections of waste and activities to reduce it. However, this approach is relatively inflexible and so could result in missed opportunities to optimise land use in manner which reduces the waste of resources. Finally, Option Two's dispersed approach to growth is likely to reduce the opportunities for recycling and industrial symbiosis as market driven development may not result in development that is sufficiently concentrated or appropriately located to support such activities.	★ 1	2	3
10. Reduce greenhouse gas emissions	Whilst none of the alternatives are predicted to result in significant effects for this sustainability objective, their relative merits can be discussed. The Wood Street area has good access to a railway station with a direct link into the City. However, bus services along Wood Street are indirectly routed and there is poor overall public transport accessibility in	★ 1	3	2

²⁹ Industrial symbiosis can be defined as the sharing of services, utility, and by-product resources among diverse actors in order to add value, reduce costs and improve the environment.

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
	<p>the area. Option One's approach to focusing significant growth in the most sustainable locations could help to improve public transport and so reduce the GHG emissions associated with private car travel (for instance by focusing development near to existing infrastructure, such as the train station, or in a manner which supports new services, such as new bus routes). The rationalisation of land uses proposed through this alternative may also present opportunities for the deployment of renewable energy systems, such as CHP systems³⁰ (which function best with a high density of development).</p> <p>The approach set out in Option Three may also present the opportunity to improve public transport services and increase the potential for renewable energy systems as a result of concentrating residential and commercial development (which may have similar transport and energy requirements, so increasing the viability of service provision). However, the relative inflexibility of this alternative means that some opportunities for emission reductions may be missed (for instance higher density residential development in proximity to the central train station could result in increased travel by foot and by train). Option Two is less likely to create patterns of development that support renewable infrastructure and improved public transport services as a result of its dispersed, market driven approach; so resulting in less chance of reduced GHG emissions.</p>			
11. Conserve energy	<p>No significant effects are predicted for alternatives. In terms of their relative merits, Option One is likely to provide the opportunity for energy savings as a result of its rationalisation of existing land uses and its focus on placing significant new development in the most sustainable locations. This may increase the potential for the installation of CHP systems which can make the best use of available energy and which rely on suitable concentrations of development to perform efficiently. Option Three may present a similar opportunity as a result of the concentration of employment and residential uses proposed (with a particularly high density of employment uses expected to emerge in the town centre under such an approach). However, the relative inflexibility of this alternative may mean that CHP type systems are not put to optimal use. For instance energy use in a commercial only centre could be very low in the evening, whilst a mixed pattern of development may result in more steady demand. Option Two is less likely to create the conditions required for such systems as a result of its dispersed approach to growth, which may fail to create suitable concentrations or positioning of development.</p>	★ 1	3	2
12. Improve air quality through a reduction in	<p>The primary opportunity to reduce air pollution in the plan area is likely to be through reductions in transport emissions, particularly resulting from private car use. The approach set out through Option One looks to deliver significant development in the most sustainable locations and to rationalise existing land uses. Such an approach may support the</p>	★ 1	3	2

³⁰ An energy study on heat demand in the Borough has indicated that there is an opportunity for the establishment of a decentralised energy network in the Wood Street area.

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
traffic-based emissions	<p>uptake of sustainable modes of transport through improved proximity to existing services and infrastructure, and by increasing the viability of new services and infrastructure (for example through greater density). The entire Waltham Forest has been declared an Air Quality Management Area (AQMA) as a result of high levels of NO₂ and PM₁₀. As such, this alternative is predicted to result in a significant positive effect against the baseline.</p> <p>In terms of the relative merits of the additional alternatives, Option Three primarily looks to guide development on the basis of its use (residential or employment), regardless of additional considerations. Such an approach may result in missed opportunities, such as the increases in sustainable transport use that can result from mixed use development that allows for shops and services to be reached easily by foot or by cycle. However, this alternative would potentially lead to a high density of employment uses in the Town Centre, near to the areas key rail link, which could lead to lower levels of commuting by private car.</p> <p>Option Two's market led, dispersed approach may fail to result in a development pattern which supports the use of existing low emission transport networks, or which produces the conditions necessary for the provision of new sustainable transport services or infrastructure. As this alternative is likely to involve an increase in the number of residents and visitors in the Wood Street area, a dispersed development pattern, and a limited consideration of sustainable transport links, significant negative effects are predicted against the baseline as a result of a likely increase in private car use.</p>			
13. Improve water quality and ensure the efficient use of water resources	No implications.	-	-	-
14. Reduce the risk of flooding	Wood Street is situated in Flood Zone 1 and has a low risk of flooding. As such, no significant effects are predicted in relation to this SA objective.	-	-	-
15. Reduce contamination and safeguard	No implications.	-	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
soil quality and quantity				
16. Make the best use of previously developed land (PDL) and existing buildings	<p>Whilst none of the alternatives are predicted to result in significant effects for this sustainability objective, their relative merits can be discussed. Option Three is likely to be the weakest of the approaches put forward. This is a result of its focus on steering growth employment uses into the town centre, with areas outside to be prioritised for residential use. By encouraging the relocation of existing uses along these lines, there may be a failure to take full advantage of existing buildings that are designed for employment / residential specific purposes. Option One meanwhile looks to provide greater flexibility in choosing a pattern of development that maximises the benefits of existing buildings.</p> <p>Option Two's focuses on market led redevelopment wherever such opportunities exist should not result in a failure to make the best use of existing buildings (at least in purely economic terms, this approach may result in the loss of existing buildings valued primarily due to their social purposes for instance). However, Option One is more likely to result in uses of existing buildings that are in line with the wider objectives of the plan, as opposed to market considerations alone.</p>	★ 1	2	3
17. Conserve and enhance biodiversity	<p>There are no significant effects predicted for any of the alternatives. In terms of the relative merits of the alternatives, none of those put forward explicitly address the conservation or enhancement of biodiversity. However, Option One's aim of focusing significant development in the most sustainable locations may reduce direct or indirect impacts of areas of biodiversity interest (there are sites of local and Borough level significance for nature conservation within and in close proximity to the plan area and Epping Forest SAC is nearby). In addition the proposed rationalisation of new developments and of existing uses in order to meet plan objectives (which include green infrastructure provision) could produce opportunities for biodiversity enhancement.</p> <p>Under Option Two, redevelopment would be primarily driven by market considerations, as opposed to impacts on biodiversity or opportunities to enhance habitat. Similarly, the approach set out in Option Three is mainly concerned with the concentration of employment and residential uses in particular areas of Wood Street rather than wider environmental concerns such as biodiversity.</p>	★ 1	2	2
18. Protect the ecological integrity of Natura 2000 sites	<p>Whilst none of the alternatives are predicted to result in significant effects for this sustainability objective, their relative merits can be discussed. The Epping Forest Natura 2000 site is situated within 3.2km walking distance of all homes within the plan areas. As such there is some potential for direct and indirect effects as a result of new development. The number of residents and visitors to the plan area may increase under all of the alternatives considered, as a result of redevelopment and predicted population growth, with a corresponding increase in the number of visitors to the Forest.</p>	★ 1	2	2

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
	<p>This could result on direct impact on the Forest if visitor numbers proved to be at unsuitable levels. Option One, through its planned intervention approach could potentially mitigate against this by providing new open spaces capable of drawing visitors away from the more sensitive Forest site, so helping to ensure is ecological integrity is maintained. The flexible approach outlined in by this alternative may also serve to reduce indirect effects on biodiversity, by guiding significant development to the most sustainable locations (so for example, ensuring that highly light polluting developments are kept away from the Forest edge).</p> <p>Option Three focuses primarily on the concentration of residential and employment uses, with residential areas to be concentrated on the outskirts of the town centre, with no explicit concern given to the creation of open space or biodiversity considerations (direct or indirect). The same can be said of Option Two, which is primarily driven by market forces and so is less likely to take ecological concerns into consideration.</p>			
19. Maintain and enhance the quality of the green belt and open space areas.	<p>There is generally a lack of open space in the Wood Street area and due to baseline trends (a growing population) and as a result of any of the alternatives (redevelopment) there is likely to be more people living and working in the area. This could place pressure on these spaces, some of which are already in poor quality (Greenway Avenue), or which may be sensitive to visitor numbers (Epping Forest). Option One proposes an approach to redevelopment that is guided by flexible, planned interventions that look to meet plan objectives (including green infrastructure provision), and to guide significant developments to the most sustainable locations. As a result this alternative is most likely to lead to the provision of new open space where required, their improvement, and their protection from excessive use (for example by guiding users onto less sensitive sites).</p> <p>The remaining two alternatives are less likely to result in positive effects in terms of this SA objective. Option Two is less likely to take suitable provision of open spaces into account as a result of its market led approach to redevelopment, with incremental growth potentially resulting in the steady decline of open spaces without consideration of mitigation. Option Three looks to concentrate residential areas outside of the town centre area and employment uses inside. This approach could lead to a significant negative effect as it is expected to lead to a large increase in development density in the town centre, where the Plaza is the only nearby open space. Despite this spaces recent public realm improvements, such an increase in density without the provision of additional open space could result in a decline in the Plaza's quality, resulting in a lack of good quality open space in the town centre area.</p>	★ 1	2	3
20. Conserve and, where appropriate, enhance the	<p>Whilst no significant effects are anticipated for any of the alternatives put forward, their relative merits can be discussed. There are four listed buildings in the Wood Street AAP area, of which one is Grade 2* listed and three Grade 2 listed. Option One, with its focus on directing significant development into the most sustainable locations and of distributing growth appropriately (taking into account an areas character, development capacity and further considerations) is most</p>	★ 1	2	2

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
historic environment	likely to ensure that redevelopment activities do not result in direct or indirect impacts on the heritage assets in the plan area. In contrast, Option Three fails to take into account such considerations, with its focus primarily being on the concentration of employment areas inside of the town centre area, and residential and social infrastructure outside of it, whilst Option Two looks to market forces to guide redevelopment activity as opposed to wider considerations. As a result, these alternatives are least preferred in relation to this sustainability objective.			
21. Maintain and enhance the vitality and viability of the Borough's town centres	<p>Waltham Forest has a lower than average small business survival rate (35% in 2010) when compared to both London (39.7%) and Great Britain (44.2%). This is of particular significance in the Wood Street area where the majority of businesses employ less than five people. Option Two is likely to be the weakest of those proposed. This primarily market led approach may result in a replication of the existing spatial patterns that have failed to promote vitality and viability in the town centre area in the past, such as a linear distribution of retail and commercial activities along the main Wood Street transport corridors.</p> <p>This dispersed approach is in contrast to the method outlined in Option Three which looks to focus significant growth in the town centre in order to produce a 'critical mass' of employment uses. However, such an approach may lead to a failure to maintain the vitality of the centre during out of business hours, potentially affecting the ability of the area to develop neighbourhood character and the viability of an evening / night time economy. A centre that is deserted out-of-hours may also attract elements of urban decay, such as vandalism, potentially reducing the long term appeal of a centre following its redevelopment. As a result, a balanced approach, which looks to optimise development opportunities regardless of location and type of use, is more likely to deliver a pattern of development which exploits synergies and develops neighbourhood character. This approach, as set out in Option One, should help to produce a town centre economy and environment that is viable and vital in the long term, and which should help to boost the survival rate of the area's small businesses. As such, this alternative may result in significant positive effects in terms of the SA objective.</p>	★ 1	3	2
22. Improve the local economy by attracting inward investment	<p>The approach set out in Option Two is likely to attract some degree of investment into the Wood Street opportunity sites, but this may be limited by a failure to plan for redevelopment in a manner which results in the provision of supporting infrastructure (such as green infrastructure, social infrastructure, sustainable transport infrastructure) and supporting uses (for example employment uses that are sufficiently concentrated to produce a viable town centre). Option Three will allow for a concentration of employment uses that may help in drawing in investment, for instance by creating a coherent centre that can be promoted as offering advantages to business. However, there are limitations to this approach as a result of its inflexibility and focus on single use development. These could include a lack of out-of-hours footfall (limiting neighbourhood character and viability of an evening / night time economy), and a high degree of density in the town centre (that may impact quality of life, neighbourhood character and the quality of nearby open</p>	★ 1	3	2

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
	spaces). Negative effects of a concentrated approach such as these may reduce levels of inward investment. As a result, the balanced approach outlined in Option One is preferred for this SA objective. This is due to its balanced approach which aims to guide redevelopment and growth in a manner which exploits any synergies, regardless of location or type of use. Given the high levels of deprivation in the Borough, with Waltham Forest ranking as the 15 th most deprived of 326 local authorities in England (with a declining position in recent years), and the Wood Street Ward ranked 79 th (of 627) most deprived within London in 2010, this alternative could result in significant positive effects against the baseline.			
23. Maintain stable levels of employment in the Borough	<p>The percentage of people who are economically active in Waltham Forest (73.1%) is lower than the London (75%) and national average (76.6%). Unemployment in the Borough has also risen from 6.5% to 11.7% since 2008. In addition, there is a relatively low survival rate of small businesses in the Borough and a concentration of this type of business in the Wood Street area. In terms of addressing these issues and ensuring that high and stable levels of employment are achieved, Option Two is considered to be the weakest of the approaches. This is due to its market led approach, which may simply result in the replication of the existing spatial patterns that have failed to promote employment growth in the past. This includes the current linear distribution of retail and commercial activities along the main Wood Street transport corridors, which has failed to produce a clearly defined town centre area capable of attracting additional visitors, businesses and inward investment, with their associated employment potential.</p> <p>Option Three in contrast aims to focus significant levels growth in the town centre in order to produce a ‘critical mass’ of employment uses. This may help to support new and existing businesses by creating a clear commercial centre in the plan area. However, such an approach may lead to a failure to maintain the vitality of the centre during out of business hours, potentially affecting the ability of the area to develop neighbourhood character and the viability of an evening / night time economy. A centre that is deserted out-of-hours may also attract elements of urban decay, such as vandalism, potential reducing the long term appeal of a centre following its redevelopment. This could have a knock on effect on visitor numbers and investment levels, reducing the viability of businesses in the area and the levels of employment they can sustain. As a result, a balanced approach, which looks to optimise development opportunities regardless of location and type of use, is more likely to deliver a pattern of development which exploits synergies and develops neighbourhood character, so maintaining and growing levels of employment through increased footfall and business viability. This approach, as set out in Option One, should help to produce a town centre economy and environment that is viable and vital in the long term, and which should help to boost the survival rate of the areas small businesses. As such, this alternative may result in significant positive effects in terms of this SA objective.</p>	★ 1	3	2

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	<u>Rank of preference</u>		
		Alt 1	Alt 2	Alt 3
<p>Summary</p> <p>Of the alternative options put forward, Option One, with its balanced approach to redevelopment, is <u>clearly the strongest performing</u>. In economic terms, it is expected to produce a number of significant positive effects (reducing deprivation, encouraging town centre vitality and viability, attracting inward investment and maintaining high levels of employment). These significant effects, and the other high scores achieved by this option, are as a result of its flexible, yet managed approach of planned intervention, which will be capable of producing and exploiting a wide range of synergies in a positive manner (in location, density, infrastructure, and facilities).</p> <p>This is in contrast to the approaches set out in Options Two (unfocused and market-led) and Three (narrowly focused on concentrating commercial and residential uses), which are less likely to take advantage of the full suite of opportunities for social, environmental and economic gains in the Wood Street area. In fact, these approaches may led to some significant negative effects against the baseline. Specifically, these are Option Two's likely failure to produce a pattern of development that supports sustainable transport infrastructure and associated reductions in road traffic emissions; and the potential effect of Option Three's concentration of employment use on open space quality and provision in the town centre area.</p>				

APPENDIX III: ALTERNATIVES APPRAISAL (TOWN CENTRE SHOPPING)

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 'town centre shopping':

1. Strengthen and enhance the town centre, with a clear spatial strategy to consolidate Wood Street
2. A market-led approach to ground floor 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 Preferred Options Consultation Document.

Methodology

For each of the alternatives, the appraisal identifies and evaluates 'likely significant effects' on the baseline / likely future baseline, drawing on the sustainability issues 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.³¹

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.³² 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.

³¹ As stated by Government Guidance (The Plan Making Manual, see <http://www.pas.gov.uk/pas/core/page.do?pagelid=156210>):

"Ultimately, the significance of an effect is a matter of judgment and should require no more than a clear and reasonable justification."

³² Environmental Assessment of Plans and Programmes Regulations 2004

Appraisal findings

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	No implications.	-	-
2. Reduce crime and the fear of crime	<p>Whilst no significant effects are anticipated for any of the alternatives put forward, their relative merits can be discussed. The approach set out through Option One may result in a positive effect on crime and the fear of crime in the Wood Street area. This is as a result of its approach to development in primary and secondary shopping areas. Under the policy approach presented, an appropriate mix of uses will be sought in the primary shopping area in order to ensure there is increased activity in the town centre throughout the night and day. In addition, a greater diversity of uses will be sought in secondary areas. These steps should ensure that there is a continuous 'street life' in the town centre area that may act as a deterrent to crime and that will provide a reassuring presence that could reduce the fear of crime. Option Two could potentially achieve the same effect should market forces dictate a similar spatial pattern. However, there is a possibility this could not occur, so resulting in negative effects in terms of crime. For instance, higher levels of day time footfall in areas of primary frontage may result in the market forces producing retail premises alone in these areas (as opposed to a mix of uses). This could lead to a town centre that is deserted during out of business hours, so offering a greater opportunity for criminal behaviour.</p>	★ 1	2
3. Improve standard of health and wellbeing of those who live and work in the Borough	No implications.	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
4. Increase the provision of and access to community facilities to meet local cultural, recreational and social needs	No significant effects are predicted for any of the alternatives put forward. Nonetheless, their relative merits can be discussed in more general terms. The policy approach put forward through Option One looks to provide for a wide variety of uses, particularly in the proposed secondary shopping area. In this part of the town centre accepted uses will include entertainment and leisure uses that may contribute to recreational and social needs. In addition cultural and creative community facilities are to be particularly encouraged. Planning for and concentrating such facilities in a clear manner should help to ensure that adequate such facilities are easily accessible and are available to meet the needs of those in the area. Whilst Option Two doesn't altogether preclude such provision, the market led, spatially undefined approach proposed is less likely to guarantee that community facilities are provided in sufficient numbers, or in a coherent manner which encourages easy access and high levels of footfall and use.	★ 1	2
5. Improve educational attainment in schools	No implications.	-	-
6. Improve opportunities for access to education and training for all residents	No implications.	-	-
7. Reduce the overall level of deprivation	Option One may result in an increase in inward investment, business activity and employment as a result of higher levels of floorspace (which will help to meet the demand generated by housing growth and increased local spending power). In addition, the clear spatial strategy set out in this alternative should help to ensure that the entire length of Wood Street that makes up the heart of the town centre is well defined and used. This should help to boost business activity and raise associated employment, so helping to tackle deprivation by increasing opportunities. However, it should be noted that the provision of a mix of units (including larger sizes in greater numbers than at present) could result in a growth in larger retailers. In the short to mid-term this may lead to an overall growth in employment and reductions in deprivation. However, such larger businesses could impact negatively on the smaller businesses that currently dominate the town centre, and the unique selling point they represent, in the mid-long term. This could lead to losses in terms of employment and a failure to tackle Wood Streets problems of deprivation (please see Appraisal	★ 1	2


SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
	<p>No.22 for an in depth discussion of the risks involved in the balanced approach set out in Alternative One). Given that Waltham Forest ranks as the 15th most deprived of 326 local authorities in England (with a declining position in recent years), and the Wood Street Ward ranked 79th (of 627) most deprived within London in 2010, declines in the number of local small businesses and so the ability of Wood Street to compete with other centres could result in a significant negative effects against the baseline.</p> <p>However, it should be noted that Option Two's market led approach could lead to a greater loss of small businesses in the area given the outright lack of protection it offers to such operations, so potentially resulting in reduced employment levels and higher levels of deprivation. In addition, this alternative would fail to provide a clear spatial strategy to address Wood Street's linear nature and as such could lead to areas of underinvestment and low economic activity forming, so failing to make the most of opportunities to create employment. With this being the case, Alternative Two is also predicted to result in significant negative effects in terms of deprivation in the Wood Street area in the mid to long-term and is the least preferred of the two alternatives presented.</p>		
8. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system	No implications.	-	-
9. Reduce production of waste and increase recycling	No implications.	-	-
10. Reduce greenhouse gas emissions	No implications.	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
11. Conserve energy	No implications.	-	-
12. Improve air quality through a reduction in traffic-based emissions	No implications.	-	-
13. Improve water quality and ensure the efficient use of water resources	No implications.	-	-
14. Reduce the risk of flooding	Wood Street is situated in Flood Zone 1 and has a low risk of flooding. As such, no significant effects are predicted in relation to this SA objective.	-	-
15. Reduce contamination and safeguard soil quality and quantity	No implications.	-	-
16. Make the best use of previously developed land (PDL) and existing buildings	No implications.	-	-
17. Conserve	No implications.	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
and enhance biodiversity			
18. Protect the ecological integrity of Natura 2000 sites	No implications.	-	-
19. Maintain and enhance the quality of the green belt and open space areas.	No implications.	-	-
20. Conserve and, where appropriate, enhance the historic environment	Whilst no significant effects are anticipated for any of the alternatives put forward, their relative merits can be discussed. The approach set out through Option One may result in positive effects in terms of this sustainability objective as it looks to provide protection to the exiting character of the town centre, including sensitive shop front restoration and renewal. Option Two may also provide similar benefits as a result of market forces. However, there are fewer guarantees that this will occur and, conversely, the character of the area could be negatively affected as a result of unrestrained development in the Wood Street town centre. As such, Option Two is considered to be the least preferred of the two alternatives presented.	★ 1	2
21. Maintain and enhance the vitality and viability of the Borough's town centres	<p>Waltham Forest has a lower than average small business survival rate (35% in 2010) when compared to both London (39.7%) and Great Britain (44.2%). This is of particular significance in the Wood Street area where the majority of businesses employ less than five people. These small businesses and the broad range of retail offering they provide are one of the 'unique selling points' of Wood Street's town centre. It is these features which allow it to provide a distinct offering in comparison to other neighbouring centres. This is important given the close proximity of competing centres such as Waltham Town Centre and Stratford City. However, there is concern that this independent retail base is being eroded by generic forms of retail.</p> <p>The policy approach set out in Option One encourages an increase in the total amount of floorspace in the town centre in order to meet demand. The result of this increase may be positive for the town centre given the proposed growth in housing in the Wood Street area, which may in turn increased local spending power. In addition, some demand has been identified for multiple retailers and chains in the Wood Street area. As a result, it is proposed that a balance of uses will be sought by providing units of different</p>	★ 1	2

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
	<p>sizes, so addressing the demand for larger retailers.</p> <p>The rationale for providing units of different (i.e. larger) sizes is to retain some of the existing spending power brought in by housing growth within the area. However, larger retailers can in fact drain money from a local economy³³ and can lead to the loss of smaller businesses as a result of competition. On the other hand larger businesses can provide employment in areas where smaller, businesses cannot operate and may provide wider services. Yet, at present there is a low vacancy rate in the town centre which suggests that small businesses are currently operating successfully. Whilst these smaller operations may not be able to offer some of the services provided by larger retailers, Wood Street is designated as a District Centre. As such, travel to other centres for wider services is to be expected and encouraged. In fact, Wood Streets current offering of smaller, niche shops appears to be what differentiates the area from these other centres and allows it to compete.</p> <p>Taking into account the above, it seems appropriate that a stronger approach could be taken to protect those smaller, independent and niche retailers operating in the town centre, so lowering the risk of damage to Wood Streets vitality and viability (at present the policy sets out only to ‘encourage’ proposals for new small scale shopping development). This could occur whilst still allowing for some degree of change as a result of demand for larger retailers. To present one example, protection could be offered to existing small units by preventing their conversion into larger units unless proven to be entirely unviable.</p> <p>In its current form, with limited protection offered to small units, attempts to strike a balance of retailers through Option One could result in significant negative effects against the baseline in the mid to long-term given the lower than average small business survival rate in the Borough, the prevalence of such businesses in this centre, and their importance to its viability and vitality in the face of competition from other centres.</p> <p>Nonetheless, it should be noted that Option Two’s market led approach could lead to a greater loss of small businesses in the area given the outright lack of protection it offers to smaller businesses (i.e. it will not seek to create a balance). In addition, this alternative would fail to provide a clear spatial strategy to address the centres linear nature, so potentially leading to a failure to support business and other activities along the full length of Wood Street (unlike Option One which seeks to create areas with distinct characters & balances of uses). With this being the case, Option Two is also predicted to result in significant negative effects and is the least preferred of the two alternative presented.</p>		
22. Improve the local economy by attracting	The policy approach set out in Option One encourages an increase in the total amount of floorspace in the town centre in order to meet demand, which is expected to grow in the wake of housing growth and associated rises in spending power in the locality. This may lead to positive effects in terms of drawing in inward investment by providing additional space for businesses to occupy in	★ 1	2

³³ New Economics Foundation – Plugging the Leaks [online] available at: http://www.pluggingtheleaks.org/downloads/ptl_handbook.pdf (accessed 02/2013)

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
inward investment	<p>the town centre. In addition, this alternative looks to provide a wider range of unit sizes in order to create a balanced mix of floorspaces, including spaces for larger retailers. The provision of a range of premise sizes is likely to help attract inward investment by creating choice for a variety of investors. In addition, this alternative looks to provide a clear spatial strategy to address Wood Streets linear nature, with areas to be created which are of a distinct character and which feature a balance of uses. Such a clear spatial approach should help to ensure that the town centre is able to support businesses all along its length, so creating a more attractive proposition to investors (for instance by promoting high levels of footfall). As a result, this alternative could result in positive effects in terms of attracting inward investment in the short to mid-term. However, the wider impacts of certain kinds of inward investment on the vitality and viability of the Wood Street area in the mid-long term (with consequences for investment levels) should not be discounted and are discussed above in Appraisal No.21.</p> <p>Option Two meanwhile is the least preferred of the alternatives put forward. Whilst this alternative may provide the additional floorspace and the variety of unit sizes required to draw in investment (due to development being led by market demand), the lack of a clear spatial strategy could have repercussions. For instance, such an approach may lead to an incoherent approach to development which fails to bring about activity across the whole length of the linear heart of Wood Street town centre, so potentially leading to areas of neglect and underinvestment which may reduce the overall appeal of the area to investors.</p>		
23. Maintain stable levels of employment in the Borough	<p>The percentage of people who are economically active in Waltham Forest (73.1%) is lower than the London (75%) and national average (76.6%). Unemployment in the Borough has also risen from 6.5% to 11.7% since 2008. Also, there is a relatively low survival rate of small businesses in the Borough and a concentration of this type of business in the Wood Street area. In terms of addressing these issues and ensuring that high and stable levels of employment are achieved, Option One may result in an increase in employment as a result of higher levels of floorspace (which will help to meet the demand generated by housing growth and increased local spending power). In addition, the clear spatial strategy set out by this alternative should help to ensure that the entire length of the town centre is well defined and used. This should help to boost business activity and raise associated employment. However, it should be noted that the provision of a mix of units (including larger sizes in greater numbers than at present) could result in a growth in larger retailers. In the short to mid-term this may lead to an overall growth in employment. However, such larger businesses could have a negative impact on the smaller businesses that currently dominate the town centre, and which represent its unique selling point, in the mid-long term potentially leading to losses in terms of employment and significant negative effects against the baseline (please see Appraisal No.22 for an in depth discussion of the risks of the balanced approach set out in Option One).</p> <p>However, it should be noted that Alternative Two's market led approach could lead to a greater loss of small businesses in the area given the outright lack of protection it offers to such operations, so potentially resulting reduced employment levels. In</p>		2

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
	<p>addition, this alternative would fail to provide a clear spatial strategy to address Wood Streets linear nature and so could lead to areas of underinvestment and low economic activity forming, so failing to make the most of opportunities to create employment. With this being the case, Option Two is also predicted to result in significant negative effects in terms of employment in the Wood Street area in the mid to long-term and is the least preferred of the two alternative presented.</p>		
<p>Summary</p> <p>Of the two approaches put forward, Option One is the <u>preferred approach in all instances</u>. The policy approach set out in this option encourages an increase in the total amount of floorspace in the town centre in order to meet the demand. In addition, it looks to provide a wider range of unit sizes in order to create a balanced mix of floorspaces, including some spaces for larger retailers. These steps are considered to lead to positive effects in terms of drawing in inward investment in the short to mid-term, with associated gains in business activity, employment and reductions in deprivation.</p> <p>However, it is considered possible that Option One may fail to adequately protect the areas small businesses from the larger retailers that could be attracted by such steps. This may lead to an eventual decline in Wood Streets unique retail offer of specialist traders, which currently enables it to differentiate itself from neighbouring centres, with negative economic effects. As a result, over the mid to long-term this option is predicted to result in significant negative effects in terms of the vitality and viability of the town centre, levels of employment and addressing deprivation.</p> <p>Nonetheless, Option Two's market-led approach is considered the <u>least strong of the options</u> put forward. This option could lead to a greater loss of small businesses in the area given the outright lack of protection it offers to such operations. This could result in a decline in the ability of Wood Street to differentiate itself from other neighbouring centres. In addition, this option fails to provide a clear spatial strategy to address Wood Street's linear nature and so could lead to areas of underinvestment and low economic activity forming, so reducing the appeal of the centre to businesses, investors and customers. In comparison to Option One, this approach is also considered less likely to create a continuous street life and so is likely to result in less safety from crime. It is also less likely to provide sufficient and accessible community facilities, and less likely to protect the existing character of the area. This is due to a lack of a clear strategy that targets the sensitive creation of clearly defined mixed use areas, as is set out in Option One.</p>			

APPENDIX IV: ALTERNATIVES APPRAISAL (PLACEMAKING/DESIGN)

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 'placemaking / design':

1. Comprehensive and integrated approach whereby development is required to comply with eight placemaking principles. Particular policy focus on ensuring historic assets and local heritage and any tall buildings meet specific criteria
2. Market-led approach to regeneration of key development sites; development on key sites would occur without compliance with placemaking principles

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 Preferred Options Consultation Document.

Methodology

For each of the alternatives, the appraisal identifies and evaluates 'likely significant effects' on the baseline / likely future baseline, drawing on the sustainability issues 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.³⁴

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.³⁵ 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.

³⁴ As stated by Government Guidance (The Plan Making Manual, see <http://www.pas.gov.uk/pas/core/page.do?pagelId=156210>):

"Ultimately, the significance of an effect is a matter of judgment and should require no more than a clear and reasonable justification."

³⁵ Environmental Assessment of Plans and Programmes Regulations 2004

Appraisal findings

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	No significant effects are predicted for these either of the alternatives presented. In terms of their relative merits of the alternatives, the additional place-making and design criteria set out in Option One could affect the viability of some forms of housing development (for example, if tall buildings are the only means to secure densities high enough to make a residential scheme financially viable) and so could restrict the ability of new developments to meet Wood Streets housing need. This is as opposed to Option Two's market led approach, which is more likely to deliver the numbers and types of homes required locally in the absence of such restrictions. Nonetheless, it should be noted that given the range of sites brought in the plan area, developers should have sufficient options available to deliver suitable housing despite design and placemaking restrictions. It is simply the case that the likelihood of sufficient delivery is higher in the absence of such policies.	2	★ 1
2. Reduce crime and the fear of crime	<p>The adoption of good design principles, as set out in Option One, can result in a public realm in which crime and the fear of crime is reduced. Alternative One looks to ensure that diversity and mixed uses are encouraged, strong and continuous frontages are encouraged in conjunction with active ground floor uses, that public and private space is clearly defined, that the back and the front of developments are correctly orientated, and that community safety is considered more generally. These design principles should help to ensure that public spaces are subject to high levels of public surveillance, with sufficient activity and 'eyes' watching the street to ensure that crime and the fear of crime is tackled. As such, this alternative could result in a significant positive effect in terms of this SA objective.</p> <p>Whilst Option Two could lead to features that reduce crime simply as a result of redevelopment activity (for instance, more active ground floor uses as a result of retail development), it is less likely to deliver benefits in a coordinated, targeted manner, and so may result in missed opportunities to improve community safety and perceptions of crime.</p>	★ 1	2
3. Improve standard of health and wellbeing of those who live and work in the Borough	None of the alternatives presented are likely to have a significant effect in relation to this SA objective. However, in terms of the relative merits of the alternatives, the application of design and placemaking principles (as set out through Option One) may help to improve access to health and social services, and the wider community, for those with mobility issues. This could occur as a result of increased permeability, including new routes and enhancement to existing connections. Option Two may not achieve a similar level of effect, as development in line with market forces is less likely to take into consideration issues surrounding access in the wider Wood Street area.	★ 1	2

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
4. Increase the provision of and access to community facilities to meet local cultural, recreational and social needs	Whilst none of alternatives put forward will result in a significant effect for this SA objective, it is possible to discuss their merits in general terms. Neither of the alternatives will result in increased provision of social infrastructure. However, Option One may help to improve access to such facilities as a result of design principles that look to increase the permeability of the Wood Street area and which make the area more legible to its users. This in contrast to Option Two , whereby a market led approach may lead to the creation of piecemeal development which does not consider access and legibility at a broad scale.	★ 1	2
5. Improve educational attainment in schools	No implications.	-	-
6. Improve opportunities for access to education and training for all residents	No implications.	-	-
7. Reduce the overall level of deprivation	<p>Although the alternatives presented are unlikely to have a significant effect in terms of this SA objective, their relative merits can be discussed. Option Two, with its market led approach to the development of key sites, may be able to deliver a greater number and variety of employment sites, in an increased number of locations, as a result of lesser restrictions in terms of design, placemaking, heritage and building height. This may help to generate employment and tackle deprivation in the Ward (at the ward level, five out of eight neighbourhoods in Wood Street are among the 20% of most deprived in England).</p> <p>In comparison, Option One may prevent the optimal use of sites for employment, so reducing the ability of new development to contribute towards tackling poverty. However, coordinated development which is sensitive to Wood Street's urban context, which improves legibility and accessibility, protects heritage assets, and which creates active, well-kept frontages on safe streets is more likely to result in a neighbourhood character that is appealing to business and to inward investment. As such, it is considered likely that the increased economic activity and associated reductions in deprivation</p>	★ 1	2

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
	resulting from an improved public realm and townscape will more than offset the disadvantages of the restrictions proposed, particularly given the number and range of key sites put forward for redevelopment in the plan area.		
8. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system	No implications.	-	-
9. Reduce production of waste and increase recycling	No implications.	-	-
10. Reduce greenhouse gas emissions	<p>None of the alternatives presented are likely to have a significant effect for this SA objective. However, the relative merits of the alternatives can be discussed. Option Two's market-led approach may allow for the creation of tall, high density residential and commercial developments in the absence of restrictions of height. Such developments could result in reductions in greenhouse gas emissions when placed near to employment areas and good public transport links by promoting sustainable travel patterns. The high density of such developments could also deliver energy efficiency gains (for example such buildings could act as anchor loads within a CHP network). However, a market led approach could also lead to tall buildings being created in less sustainable locations for travel, with negative consequences.</p> <p>Option One puts forward a more balanced approach which will allow tall buildings where appropriate, whilst restricting their creation elsewhere (such as where public transport links are limited). As such, this alternative is more likely to result in an overall reduction in greenhouse gas emissions due to sustainable transport uptake. Whilst this alternative would likely</p>	★ 1	2

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
	result in less tall buildings, and so fewer opportunities for energy efficiency gains, it could still lead to the creation of some high density developments capable of boosting CHP viability ³⁶ . Finally, increased legibility and accessibility, as advocated through Option One's design principles, should help to encourage travel by foot. Taking all these aspects into account, Option One is the preferred alternative in terms of reducing greenhouse gas emissions.		
11. Conserve energy	Although none of the alternatives put forward are likely to have a significant effect in terms of this SA objective, their relative merits can be discussed. In the absence of restrictions of height, the market-led approach set out through Option One may allow for the creation of tall, high density residential and commercial developments. Such buildings would likely provide greater concentrations of energy use and so greater potential for energy efficiency measures (such as acting as anchor loads within a CHP network). Option Two also provides some scope for energy efficiency gains as it does not rule out tall buildings outright (with their acceptance to be based on considerations of 'suitability'). However, the delivery of such developments would be likely to be more restricted, so resulting in fewer opportunities for energy conservation as a result of high densities and energy sharing	2	
12. Improve air quality through a reduction in traffic-based emissions	<p>Whilst none of alternatives put forward will result in a significant effect for this SA objective, it is possible to discuss their merits in general terms. The entire Waltham Forest has been declared an Air Quality Management Area (AQMA) as a result of high levels of NO₂ and PM₁₀, and as such air quality is a key issue in Wood Street. The market-led approach set out in Option Two may allow for the creation of tall, high density, residential and commercial developments as a result of lesser restrictions of height. Such developments could result in reductions in traffic emissions and improved air quality when placed near to employment areas and good public transport links due to the promotion of sustainable travel patterns. However, a market led approach could also lead to tall buildings being created in less sustainable locations for travel, with negative consequences in terms of this objective.</p> <p>In contrast, Option One puts forward a more balanced approach which will allow tall buildings where appropriate, whilst restricting their creation elsewhere (such as where public transport links are poor). The increased accessibility and legibility promoted by this alternative is also likely to encourage transport by foot. As such, this alternative is more likely to result in an overall reduction in traffic-based emissions and improvements in air quality.</p>		2
13. Improve water quality and ensure the efficient use of	No implications.	-	-

³⁶ An energy study on heat demand in the Borough has indicated that there is an opportunity for the establishment of a decentralised energy network in the Wood Street area

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
water resources			
14. Reduce the risk of flooding	Wood Street is situated in Flood Zone 1 and has a low risk of flooding. As such, no significant effects are predicted in relation to this SA objective.	-	-
15. Reduce contamination and safeguard soil quality and quantity	No implications.	-	-
16. Make the best use of previously developed land (PDL) and existing buildings	No implications.	-	-
17. Conserve and enhance biodiversity	No implications.	-	-
18. Protect the ecological integrity of Natura 2000 sites	No implications.	-	-
19. Maintain and enhance the quality of the green belt and open space areas.	Although the alternatives presented are unlikely to have a significant effect in terms of this SA objective, their relative merits can be discussed. The approach outlined though Option One is most likely to result in open spaces areas that are appropriately maintained and enhanced. This is a result of this alternatives coordinated approach to improving the accessibility of the area, including its open space, whereby greater use is likely to lead to spaces that are cared for rather than neglected. Whilst greater accessibility could result in some negative consequences (such as the overuse of spaces), a holistic approach to providing access is likely to be capable of managing such issues (for instance by ensuring that a	★ 1	2

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
	variety of spaces are easily reachable, so spreading the visitor load more evenly). In contrast, Option Two is less likely to guide visitors to open spaces in a manner which sustains and improves them, as its market led approach may result in uncoordinated, piecemeal development which could lead to spaces being overwhelmed with visitors or underused.		
20. Conserve and, where appropriate, enhance the historic environment	<p>Although there are no conservation areas in the Wood Street area, there are a number of heritage assets of value. There are four locally listed buildings, of which one is Grade 2* listed and three Grade 2 listed. In addition, there are a number of locally listed buildings and a series of Shopfronts that contribute to local character. In order to protect these heritages assets Option One sets out to ensure that they are retained, re-used, or sensitively renewed, refurbished, or redeveloped. It also requires development to take account of and minimise the impact on the setting of such assets. As a result, this alternative is predicted to result in significant positive effects in terms of this SA objective.</p> <p>The market-led approach of Option Two would be less restricted in terms of preserving the specific historic and valued character of the Wood Street area. As such, there is a greater potential for negative effects to occur to the areas heritage assets. However, significant impacts should be avoided as result of the heritage policy set out in the Waltham Forest Core Strategy, which looks to ensure ‘conservation, enhancement and enjoyment of the Borough’s heritage assets and their settings’³⁷ and which will apply to any new development in the area.</p>	★ 1	2
21. Maintain and enhance the vitality and viability of the Borough’s town centres	<p>Whilst neither of alternatives put forward will result in a significant effect for this SA objective, it is possible to discuss their merits in general terms. Waltham Forest has a lower than average small business survival rate (35% in 2010) when compared to both London (39.7%) and Great Britain (44.2%). This is of particular significance in the Wood Street area where the majority of businesses employ less than five people. Option Two, with its market led approach to the development of key sites in the town centre, may be able to deliver a greater number and variety of employment sites in the town centre, on an increased number of sites, as a result of lesser restrictions in terms of design, placemaking, heritage and building height. This may help to generate employment and so maintain the vitality and viability of Wood Street’s town centre.</p> <p>In comparison, Option One may prevent the optimal use of town centre sites for employment, so reducing the ability of new developments to contribute towards its vitality and viability. However, coordinated development which is sensitive to Wood Street’s urban context, which improves legibility and accessibility, protects heritage assets, and which creates active, well-kept frontages on safe streets is more likely to result in an urban character in the town centre that is appealing to business and to inward investment. As such, it is considered likely that the increased economic activity resulting from an improved public realm and townscape in the town centre will more than offset the disadvantages of the restrictions</p>	★ 1	2

³⁷ Waltham Forest Local Plan – Core Strategy [online] available at: <http://www.walthamforest.gov.uk/Documents/adopted-core-strategy.pdf> (accessed 01/2013)

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
	proposed, particularly given the number and range of key sites put forward for redevelopment.		
22. Improve the local economy by attracting inward investment	<p>None of the alternatives presented are likely to have a significant effect. However, the relative merits of the alternatives can be discussed. Given the high levels of deprivation in the Borough, with Waltham Forest ranking as the 15th most deprived of 326 local authorities in England (with a declining position in recent years), and the Wood Street Ward ranked 79th (of 627) most deprived within London in 2010, there is an urgent need for inward investment to drive the local economy and to create employment opportunities. Option Two, with its market led approach to the development of key sites, may be able to deliver a greater number and variety of employment sites in the town centre, on an increased number of sites, as a result of lesser restrictions in terms of design, placemaking, heritage and building height. This may help to encourage higher levels of inward investment as a result of increased investor choice.</p> <p>Option One may reduce the range of investment opportunities available in the plan area as a result of the restrictions it imposes. However, coordinated development which is sensitive to the urban context, which improves legibility and accessibility, protects heritage assets, and which creates active, well-kept frontages on safe streets is more likely to result in a urban character in the town centre that is appealing to business and to inward investment. As such, it is considered likely that an improved public realm and townscape in Wood Street will more than offset the disadvantages of the restrictions proposed, particularly given the number and range of key sites put forward for redevelopment by the plan.</p>	★ 1	2
23. Maintain stable levels of employment in the Borough	<p>Although none of the alternatives put forward are likely to have a significant effect in terms of this SA objective, their relative merits can be discussed. The percentage of people who are economically active in Waltham Forest (73.1%) is lower than the London (75%) and national average (76.6%). Unemployment in the Borough has also risen from 6.5% to 11.7% since 2008. In addition, there is a relatively low survival rate of small businesses in the Borough and a concentration of this type of business in the Wood Street area. Option Two, with its market led approach to the development of key sites, may be able to deliver a greater number and variety of employment sites in the town centre, on an increased number of sites, as a result of lesser restrictions in terms of design, placemaking, heritage and building height. This may help to generate business activity, with associated gains in terms of employment.</p> <p>Meanwhile, Option One may prevent the optimal use of key sites for employment, so reducing the ability of new developments to contribute towards maintaining and growing employment opportunities. However, coordinated development which is sensitive to Wood Street's urban context, which improves legibility and accessibility, protects heritage assets, and which creates active, well-kept frontages on safe streets is more likely to result in an urban character that is appealing to business and to inward investment. As such, it is considered likely that the increased economic activity and associated employment resulting from improvements in the areas public realm and townscape will more than offset the disadvantages of the restrictions proposed, particularly given the number and range of key sites put forward for</p>	★ 1	2

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
	redevelopment.		
<p>Summary</p> <p>Of the alternative options presented, the approach set out in Option One is likely to result in the <u>highest level of sustainability</u>. In particular, it may result in significant positive effects in terms of reducing crime and the fear of crime (through the design principles it sets out), and conserving and enhancing the historic environment (as a result of policies protective of local character and heritage assets). More generally, it is considered to be the preferable option in terms of a range of a number of social SA objectives due to the greater accessibility it is likely to provide. In addition economic gains are also predicted due to an enhanced public realm and townscape which may lead to increased inward investment, business activity, and employment; all of which may help in tackling deprivation in the Wood Street area. Environmental gains are also anticipated in terms of overall reductions in greenhouse gas emissions, air quality, and the maintenance of good quality open spaces.</p> <p>Option Two, with its market led approach to the development of key sites, may be able to provide gains in some areas as a result of reduced restrictions on development types and patterns. These areas of benefit are housing (as a result of a greater choice of sites for developers), and energy conservation (due to increased opportunities for the construction of tall, high density developments). However, the benefits of this approach are outweighed by the disadvantages of an uncoordinated, market led approach which is more likely to miss opportunities for synergistic improvements and to neglect the wider benefits of protection.</p>			

APPENDIX V: 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 approaches to 'housing growth':

1. Up to 1000 new houses to be developed over the plan period
2. Up to 650 new houses to be developed over the plan period
3. Up to 1470 new houses to be developed over the plan period

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 Preferred Options Consultation Document.

Methodology

For each of the alternatives, the appraisal identifies and evaluates 'likely significant effects' on the baseline / likely future baseline, drawing on the sustainability issues 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.³⁸

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.³⁹ 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.

³⁸ As stated by Government Guidance (The Plan Making Manual, see <http://www.pas.gov.uk/pas/core/page.do?pagelid=156210>):

"Ultimately, the significance of an effect is a matter of judgment and should require no more than a clear and reasonable justification."

³⁹ Environmental Assessment of Plans and Programmes Regulations 2004

Appraisal findings

Table presenting an appraisal of the following ‘Affordable Housing Proportion’ options:



- (1) Up to 1000 new houses to be developed over the plan period
- (2) Up to 650 new houses to be developed over the plan period
- (3) Up to 1470 new houses to be developed over the plan period

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	<p>There is an identified need for increased amounts of family housing in Walthamstow Forest. Currently there is a higher proportion of houses and bungalows in the Wood Street area compared to the Borough average, with a predominance of Victorian houses setting the historic character. In addition, the area is in close proximity to Walthamstow Town Centre, public transport connections, and open spaces such as Epping Forest; all of which may prove attractive to families. As a result, the delivery of such housing may particularly help to meet local housing needs. In terms of the alternatives presented, the delivery of up to 1470 homes (Option Three) may fail to deliver sufficient quantities of family homes. This is due to the high housing densities that would be required to deliver this quantum of housing growth on the limited area of land available (given that the amount of land available – i.e. the key sites – is to remain the same for all alternatives).</p> <p>In contrast, setting a limit of 650 new homes, as is the case with Option Two, may result in a higher number of family homes being completed due to the increased space available per property. However, such an approach could work against the creation of a balanced community by failing to address the needs of those requiring alternative forms of tenure. In addition, this lower level of density could result in the reduced viability of some sites, leading to under-delivery of family homes relative to the development potential of the key sites.</p> <p>The areas current Victorian housing stock has a typical density of 60-80 dwellings per hectare, which corresponds closely to the average density that is likely to be achieved as a result of the quantum of housing put forward in Option One. As such, this alternative should allow sufficient scope to create homes at a density that makes the most out of the sites available, whilst not precluding the creation of family homes. In addition, this alternative should provide sufficient flexibility to provide a balanced mix of dwelling types (as opposed to the single / twin bed properties likely to be driven by higher densities; or mainly family units driven by a lower upper limit). This may aid developers when it comes to making the optimum use of sites and should therefore also improve viability. As a result of these considerations this alternative is predicted to result in a significant positive effect in terms of this SA objective.</p>	1	2	3

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
2. Reduce crime and the fear of crime	No implications.	-	-	-
3. Improve standard of health and wellbeing of those who live and work in the Borough	<p>Whilst none of the alternatives presented are predicted to result in a significant effect, their relative merits can be discussed. At the Borough level there is an identified need for increased amounts of family housing. A failure to address this need may result in reduced wellbeing those who require such housing (for instance due to overcrowded living conditions, or the need to leave the Borough to find suitable dwellings). It is predicted that Option One will result in the delivery of a greater number of family homes through a density that will make maximum use of the key sites available, and so could constitute positively to well-being. This is as opposed to Option Two (which may preclude the creation of such homes due to the high densities proposed) and Option Three (which may result in fewer, albeit more spacious homes, as a result of a lower density target and an associated reduction in viability).</p> <p>An additional consideration in terms of health and wellbeing is the quality and availability of open spaces (with the potential for recreation and activity that they provide) and other community facilities of importance (such as health centres). Of those put forward, Option Three may be able to provide the largest area for the provision of private or communal open space (above DMP standards) and a lower level of population using such spaces and the areas facilities. However, its potentially lower viability may reduce the developer contributions available to improve existing spaces and facilities. Option Two in contrast may result in less available space (and a high population), but better viability (and so higher contributions). A higher population might also boost the independent viability of social facilities in the medium to long term. Meanwhile, the density proposed in Option One offers a 'middle ground' between provision of additional open space and the extent of developer contributions, plus a population level that is less likely to result in negative impacts in the short-medium term. As such, it is considered to be the preferred alternative.</p>	★ 1	2	2
4. Increase the provision of and access to community facilities to meet local cultural, recreational and social needs	<p>None of the alternatives put forward are expected to result in significant effects in terms of this SA objective. It is however possible to discuss their merits in more general terms. All of the alternatives presented will lead to growth in the Wood Street areas population. This will place pressure on existing facilities and is likely to occur in a climate of public spending cuts. The lower quantum of housing, such as that proposed through Option Two, will lead to lowest increase in the areas population, so limiting the impact of extra residents on existing social infrastructure. However, its potentially lower viability may reduce the developer contributions available to improve existing facilities and to provide new ones, plus the catchment necessary to make such facilities independently viable. A higher density, such Option Three's target of 1470 new homes in the plan-period, will result in the opposite: potentially greater viability and developer contributions, but a higher population (although this may boost the independent viability of social facilities in the medium-long term).</p>	★ 1	3	2

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
	Given this, the balanced approach of Option One may offer the least risk of the under-provision and decline of key social facilities. This is due to the moderate population increase it may bring about (which should help to avoid existing facilities becoming overwhelmed in the short-medium term) and the viability of the density proposed (which may help to secure improvements in Wood Street’s social infrastructure).			
5. Improve educational attainment in schools	No implications.	-	-	-
6. Improve opportunities for access to education and training for all residents	No implications.	-	-	-
7. Reduce the overall level of deprivation	Whilst none of the alternatives presented are predicted to result in a significant effect, their relative merits can be discussed. Waltham Forest ranks as the 15 th most deprived of 326 local authorities in England (with a declining position in recent years), and the Wood Street Ward ranked 79 th (of 627) most deprived. As such there is a clear need to bring down deprivation in the area, In terms of economic benefits alone, Option Three may be the preferred approach. This is due to the greater increase in population that this alternative may bring about and the increased catchment this would provide for Wood Street’s town centre, so increasing its viability (through raised footfall and increased spending power in the area). However, such an increase in population may have some degree of negative impact on other determinants of deprivation (such as on health and wellbeing and access to social infrastructure; please see discussion above in appraisals no.4 & 7). Option Two in contrast provides a lower level of population increase, but is likely to bring about lesser economic gains as a result. Therefore, the preferred alternative for this SA objective is Option One , which may result in an improved economic climate in the Wood Street area, whilst simultaneously ensuring that the local population doesn’t grow to the point where other social services and facilities are strained in the short-medium term.	★ 1	3	2

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
8. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system	None of the alternative presented are predicted to have a significant effect on the baseline. In terms of their relative merits, it is notable that Option Three is likely to have the greatest impact on the existing transport system as a result of population growth. However, it may also be able to secure a greater level of developer contribution that the other alternatives, which could be used to facilitate transport improvements in the medium-long term. In addition, this population growth may lead to the improved independent viability of additional transport services. Meanwhile, Option Two is likely to have the lowest impact on Wood Streets transport system. This may however result in a failure to take full advantage of the existing transport capacity of the area (such as the overland train service). In addition, the lower density proposed may result in reduced viability and associated developer contributions, so limiting the finances available for transport improvements. Overall, Option One , with its more moderate density proposal should help to make best use of existing transport capacity, whilst also providing scope for improvements as a result of financial contributions.	★ 1	3	2
9. Reduce production of waste and increase recycling	No implications.	-	-	-
10. Reduce greenhouse gas emissions	Of those alternatives presented, Option Two is considered likely to bring about the lowest level of reduction in greenhouse gas emissions. This is due to the low density proposed, which is unlikely to make best use of existing sustainable transport infrastructure or bring about improvements in its provision (please see the discussion above in appraisal no.8). Also, importantly, lower densities are less able to support energy efficiency measures such as district heating systems. An energy study on heat demand in the Borough has indicated that there is currently an opportunity for the establishment of a decentralised energy network in the Wood Street area. However, this alternative may reduce the viability of such a network (as it proposes building housing at a density lower than the current stock) and so could result in significant negative effects in terms of this SA objective. Option Three , which proposes the highest density of the three alternatives, is likely to bring about the largest greenhouse gas reductions due to the support it offers for energy efficiency improvements. Higher densities could also result in increased uptake of sustainable transport and associated emission reductions when placed near to appropriate	2	3	★ 1

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
	infrastructure, such as Wood Street's railway station (with development to be guided towards areas accessible by public transport through Policy CS7 of the Waltham Forest Core Strategy ⁴⁰). However, it should be noted that provision of sustainable transport infrastructure in the area may lag behind the demand generated for it by this alternative in the short-medium term. Meanwhile, Option One's moderate level of housing provision will likely result in correspondingly moderate gains in sustainable transport uptake and energy efficiency improvements.			
11. Conserve energy	Energy efficiency measures such as a combined heat and power network perform best when development occurs at high densities. As such, Option Three , which proposes the highest density of the three alternatives, is likely to bring about the largest gains in terms of energy conservation. An energy study on heat demand in the Borough has indicated that there is an opportunity for the establishment of a decentralised energy network in the Wood Street area. As this alternative could support the establishment of such a system, significant positive effects are predicted. In comparison, the lower densities proposed through Option One is likely to lead to lesser improvements in efficiency. The density set out in Option Two is lower than the current average density of the housing stock in the Wood Street area and so could reduce the viability of a district heating network. As a result, significant negative effects could occur against the baseline.	2	3	1 
12. Improve air quality through a reduction in traffic-based emissions	Whilst none of the alternatives presented are predicted to result in a significant effect, their relative merits can be discussed. Air quality improvements are least likely to be secured under Option Two , as the density proposed is unlikely to make best use of existing sustainable transport infrastructure or bring about improvements in its provision (please see the discussion above in appraisal no.8). The higher density set out in Option Three is more likely to result in increased uptake of sustainable transport and associated air quality improvements when placed near to appropriate infrastructure, such as Wood Street's railway station (with development to be guided towards areas accessible by public transport through Policy CS7 of the Waltham Forest Core Strategy ⁴¹). However, it should be noted that provision of sustainable transport infrastructure in the area may lag behind the demand generated for it by this alternative in the short-medium term. Meanwhile, Option One's moderate level of housing provision will likely result in correspondingly moderate gains in sustainable transport uptake and corresponding reductions in traffic-based emissions.	2	3	1 
13. Improve water quality and ensure the	No implications.	-	-	-

⁴⁰ Waltham Forest Local Plan – Core Strategy [online] available at: <http://www.walthamforest.gov.uk/Documents/adopted-core-strategy.pdf> (accessed 02/2013)

⁴¹ ibid

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
efficient use of water resources				
14. Reduce the risk of flooding	Wood Street is situated in Flood Zone 1 and has a low risk of flooding. As such, no significant effects are predicted in relation to this SA objective.	-	-	-
15. Reduce contamination and safeguard soil quality and quantity	No implications.	-	-	-
16. Make the best use of previously developed land (PDL) and existing buildings	No implications.	-	-	-
17. Conserve and enhance biodiversity	<p>None of the alternatives put forward are expected to result in significant effects in terms of this SA objective. It is however possible to discuss their merits in more general terms. Those alternatives involving a greater increase in the areas population are considered more likely to result in negative impacts on the areas biodiversity. Development at higher densities is less likely to provide the space required to incorporate green infrastructure improvements that can bring benefits to biodiversity (such as green corridors for migration) and resident (various ecosystem services), whilst increasing the chances such spaces are lost. In addition, higher levels of population may generate indirect impacts on the areas biodiversity, particularly Epping Forest. As such Option One and Three are considered less preferable when compared to Option Three and the lower quantum of housing growth it proposes.</p> <p>It should be noted, however, that developer contributions (which would likely be higher under Option One and Three) could be used to improve biodiversity in the Wood Street area as a whole, for instance by enhancing existing space, or installing new elements of green infrastructure (which could be strategically targeted to benefit biodiversity, rather than simply occurring on the opportunity sites currently identified).</p>	2	★ 1	3

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
18. Protect the ecological integrity of Natura 2000 sites	Although none of the alternatives presented here are predicted to result in a significant effect, their relative merits can be discussed. Epping Forest is in close proximity to the Wood Street plan-area and, as such, development here could have implications for this SAC. Of particular concern is the impact that an increased population might have on the Forest, with additional visitors potentially posing a threat to the ecology of the site (for example, due to increased human activity scaring away or altering the habits of certain species). As such Option One and Three are considered less preferable when compared to Option Three and the lower quantum of housing growth it proposes. It should be noted, however, that developer contributions (which would likely be higher under Option One and Three) could be used to provide additional protection to the site.	2	★ 1	3
19. Maintain and enhance the quality of the green belt and open space areas.	None of the alternative presented are predicted to have a significant effect on the baseline. In terms of their relative merits, Option Three is most likely to result in a lower degree of impact on the quality of Wood Street's existing open spaces due to its lower proposed housing density. This is important as Wood Street currently suffers from a lack of open space, and so increased visitors may result in a decline in the quality of open space provision. In addition, this alternative also provides the best opportunity to provide new open spaces (communal and private) as a result of the land freed up by low density development. Option One and Three meanwhile call for a higher quantum of growth, and so could lead to under provision in space in terms of both area and quantity. However, there is the potential for developer contributions (which would likely be higher under Option One and Three) to be used to improve open space quality and provision in Wood Street.	2	★ 1	3
20. Conserve and, where appropriate, enhance the historic environment	None of the alternatives put forward are expected to result in significant effects in terms of this SA objective. It is however possible to discuss their merits in more general terms. The areas current Victorian housing stock has a typical density of 60-80 dwellings per hectare, which corresponds closely to the average density that is likely to be achieved as a result of the quantum of housing put forward in Option One . As such, this alternative should allow for easier conservation of Wood Street's historic character when compared to Option Two and Three .	★ 1	2	2
21. Maintain and enhance the vitality and viability of the Borough's town centres	Although none of the alternatives presented here are predicted to result in a significant effect, their relative merits can be discussed. Waltham Forest has a lower than average small business survival rate (35% in 2010) when compared to both London (39.7%) and Great Britain (44.2%). This is of particular significance in the Wood Street area where the majority of businesses employee less than five people. In terms of encouraging economic activity in the town centre, Option Three may be the preferred approach. This is due to the greater increase in population that this alternative may bring about and the increased catchment this would provide for Wood Street's town centre, so increasing its viability	★ 1	3	2

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
	<p>(through raised footfall and increased spending power in the area). Meanwhile, Option One and particularly Option Two will result in lesser gains in footfall and spending power due to their lower proposed densities and associated population growth.</p> <p>However, it should be noted that a large increase in population and housing density, as proposed by Option Three, may result have wider implications (such as on open space provision and local facilities; see the above appraisals). Wider negative impacts on the quality of the Wood Street area could result in lower inward investment, as businesses look for better conditions elsewhere. Such impacts could in some circumstances be offset through developer contributions, or in the medium-long term as a result of economic growth in the area. However, a balanced approach to housing growth, as set out in Option One could offer businesses suitably high footfall along with an acceptable wider environment at a lower risk of overall failure.</p>			
22. Improve the local economy by attracting inward investment	<p>None of the alternatives put forward are expected to result in significant effects in terms of this SA objective. It is however possible to discuss their merits in more general terms. Given the high levels of deprivation in the Borough, with Waltham Forest ranking as the 15th most deprived of 326 local authorities in England (with a declining position in recent years), and the Wood Street Ward ranked 79th (of 627) most deprived within London in 2010, there is a clear need to bring inward investment into the area. In terms of economic considerations alone, Option Three may be the preferred approach. This is due to the greater increase in population that this alternative may bring about and the increased catchment this would provide for businesses, so creating an encouraging environment for investment. Meanwhile, Option One and particularly Option Two will result in lesser gains in footfall and spending power due to their lower proposed densities and associated population growth.</p> <p>However, it should be noted that a large increase in population and housing density, as proposed by Option Three, may result have wider implications (such as on open space provision and local facilities; see the above appraisals). Wider negative impacts on the quality of the Wood Street area could result in lower inward investment, as businesses look for better conditions elsewhere. Such impacts could in some circumstances be offset through developer contributions, or in the medium-long term as a result of economic growth in the area. However, a balanced approach to housing growth, as set out in Option One could offer businesses suitably high footfall along with an acceptable wider environment at a lower risk of overall failure.</p>	★ 1	3	2
23. Maintain stable levels of employment in the Borough	<p>Although none of the alternatives presented here are predicted to result in a significant effect, their relative merits can be discussed. The percentage of people who are economically active in Waltham Forest (73.1%) is lower than the London (75%) and national average (76.6%). Unemployment in the Borough has also risen from 6.5% to 11.7% since 2008. In addition, there is a relatively low survival rate of small businesses in the Borough and a concentration of this type of</p>	★ 1	3	2

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
	<p>business in the Wood Street area. In terms of addressing these issues, Option Three may be the preferred approach in terms of purely economic consideration. This is due to the greater increase in population that this alternative may bring about and the increased catchment this would provide for businesses, so creating an encouraging environment for investment and job creation. Meanwhile, Option One and particularly Option Two will result in lesser gains in footfall and spending power due to their lower proposed densities and associated population growth.</p> <p>However, it should be noted that a large increase in population and housing density, as proposed by Option Three, may result have wider implications (such as on open space provision and local facilities; see the above appraisals). Wider negative impacts on the quality of the Wood Street area could result in lower inward investment, as businesses look for better conditions elsewhere, with resulting declines in employment. Such impacts could in some circumstances be offset through developer contributions, or in the medium-long term as a result of economic growth in the area. However, a balanced approach to housing growth, as set out in Option One could offer businesses suitably high footfall along with an acceptable wider environment at a lower risk of overall failure.</p>			
<p>Summary</p> <p>Of the approaches to housing growth presented, Option One is the <u>strongest performing</u> across all of the SA objectives considered. A key consideration was the ability of the alternative options to meet the housing needs of the area. In this respect, Option One is predicted to result in significant positive effects as a result of a density which allow sufficient scope to create homes at a density that makes the most out of the sites available, whilst not precluding the creation of family homes and enabling dwelling types to be balanced. Additional wider benefits of this option tend to result from the balanced approach it offers, whereby growth in Wood Street’s population and local economy is encouraged, but not at the expense of existing facilities and spaces. This balance is likely to bring social (such as protected and improved community facilities) and economic benefits (such as increased inward investment).</p> <p>In environmental terms, Option One appears to be weaker. In terms of greenhouse gas emissions it fails to take full advantage of the gains that more concentrated development, such that proposed through Option Three, can bring about in terms of energy efficiency and sustainable transport uptake. However, in relation to Wood Street’s biodiversity and open spaces (including Epping Forest), lower densities such as that set out in Option Two are considered preferable due to lesser direct (development footprint) and indirect impacts (visitor numbers). However, given these contrasting results, in which lower and higher degrees of density are preferred for separate environmental aspects, Option One’s balanced approach perhaps represents the best overall compromise.</p>				

APPENDIX VI: ALTERNATIVES APPRAISAL (AFFORDABLE HOMES)

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 'affordable homes':

1. Provision of affordable homes in accordance with DM policies DPD, but with requirements to be established on a site-by-site basis
2. Requiring financial contributions in lieu of provision for affordable 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 Preferred Options Consultation Document.

Methodology

For each of the alternatives, the appraisal identifies and evaluates 'likely significant effects' on the baseline / likely future baseline, drawing on the sustainability issues 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.⁴²

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.⁴³ 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.

⁴² As stated by Government Guidance (The Plan Making Manual, see <http://www.pas.gov.uk/pas/core/page.do?pagelid=156210>):


"Ultimately, the significance of an effect is a matter of judgment and should require no more than a clear and reasonable justification."

⁴³ Environmental Assessment of Plans and Programmes Regulations 2004

Appraisal findings

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	<p>Waltham Forest ranks as the 15th most deprived of 326 local authorities in England (with a declining position in recent years), and the Wood Street Ward ranked 79th (of 627) most deprived. An indication of the problems faced by Wood Street can be seen in the high levels of housing deprivation that are to be found across the area, with many locations being amongst the 20% most deprived nationwide.</p> <p>The Wood Street AAP aims for up to 1000 homes to be delivered in the area over the plan period. In terms to affordable housing, Option One proposes that the level of provision will be established on a site-by-site basis. Where developments are to not able to deliver the required quantity of affordable housing due to viability, deferred contributions will be used. Through these contributions affordable housing will be delivered on-site following a viability reassessment; or where this is not possible, through financial contributions in-lieu of on-site or off-site provision. This should help to ensure that affordable housing is delivered in the area up to targeted levels wherever possible, so producing positive effects in terms of providing a mix of new dwellings. In addition, this policies flexibility should ensure that housing delivery is not unduly hindered by affordable housing levels. Overall, this approach should lead to significant positive effect for this SA objective.</p> <p>The approach outlined in Option Two would seek financial contributions in lieu of provision for affordable housing. It is noted that there is a need to support the regeneration of the existing affordable housing in the Wood Street area and that such financial contributions could aid this (as could deferred financial contributions potentially made under Alternative One, albeit to a lesser extent). Such an approach would however severely limit the scope to deliver new affordable housing in the AAP area over the entire plan period. Given this, and the identified need for affordable homes in the Wood Street area and Borough-wide, significant negative effects are predicted against the baseline for this alternative.</p>		<p>2</p>
2. Reduce crime and the fear of crime	<p>Whilst evidence is not firmly established, the creation of mixed income communities may help to reduce levels of crime by countering the negative area affects that can occur as a result of concentrated areas of lower income housing, and the community segregation that can emerge from concentrating higher income dwellings. As a result, Option One could lead to positive effects in terms of this SA objective through its provision of affordable housing across all residential developments in Wood Street where its delivery is viable. In comparison, Option Two appears more likely to create segregated communities, with concentrations of low income housing as it will allow all developments in Wood Street to proceed without an affordable housing element.</p>		<p>2</p>

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
3. Improve standard of health and wellbeing of those who live and work in the Borough	No significant effects are predicted for any of the alternatives put forward. Their relative merits can, however, be discussed. The approach set out by Option Two could result in an outmigration of those with lower incomes as a result of a failure to provide affordable housing to meet the Wood Street area's housing needs. This may lead to significant negative effects against the baselines as a result of the social displacement that such an approach may produce. Alternately, even if outmigration were not to occur, a failure to address local need for additional affordable housing may cause negative effects in terms of wellbeing by increasing levels of housing and overall deprivation (contributions in lieu may help to improve existing housing, but would not resolve the demand for new affordable housing). In contrast, Option One should minimise the risk of displacement and negative effects on wellbeing as a result of an approach which will seek to provide appropriate levels of affordable housing wherever possible.	★ 1	2
4. Increase the provision of and access to community facilities to meet local cultural, recreational and social needs	No implications.	-	-
5. Improve educational attainment in schools	No implications.	-	-
6. Improve opportunities for access to education and training for all residents	No implications.	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
7. Reduce the overall level of deprivation	<p>The approach set out by Option Two may reduce average deprivation in the Wood Street area. Such a change could result from the outmigration of those Wood Street residents with lower incomes due to a lack of affordable housing, coupled with the larger numbers of higher income residents that could be accommodated in the absence of affordable housing provision. However, such an approach may lead to an intensification of the problems of deprivation elsewhere, particularly as there is already a need to provide affordable housing on a Borough-wide level, and would represent a missed opportunity to contribute to reducing this problem at the local level. In addition, should outmigration not occur, problems of housing need and deprivation would be likely to intensify within the Wood Street area. As such, under either scenario this alternative is predicted to result in significant negative effects against the baseline.</p> <p>Option One meanwhile should help to ensure that affordable housing is provided in the Wood Street area, where there are existing problems in terms of overall deprivation (Wood Street Ward ranked 79th of 627 most deprived) and housing deprivation, leading to significant positive effects.</p>		2
8. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system	No implications.	-	-
9. Reduce production of waste and increase recycling	No implications.	-	-
10. Reduce greenhouse gas emissions	No implications.	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
11. Conserve energy	No implications.	-	-
12. Improve air quality through a reduction in traffic-based emissions	No implications.	-	-
13. Improve water quality and ensure the efficient use of water resources	No implications.	-	-
14. Reduce the risk of flooding	Wood Street is situated in Flood Zone 1 and has a low risk of flooding. As such, no significant effects are predicted in relation to this SA objective.	-	-
15. Reduce contamination and safeguard soil quality and quantity	No implications.	-	-
16. Make the best use of previously developed land (PDL) and existing buildings	No implications.	-	-
17. Conserve and enhance biodiversity	No implications.	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
18. Protect the ecological integrity of Natura 2000 sites	No implications.	-	-
19. Maintain and enhance the quality of the green belt and open space areas.	No implications.	-	-
20. Conserve and, where appropriate, enhance the historic environment	No implications.	-	-
21. Maintain and enhance the vitality and viability of the Borough's town centres	<p>No significant effects are predicted for either of the alternatives. Nonetheless, their relative merits can be discussed. The approach set out by Option Two may increase spending power in the Wood Street area. This could result from the outmigration of those Wood Street residents with lower incomes due to a lack of affordable housing, coupled with the larger numbers of higher income residents that could be accommodated in the absence of affordable housing provision. Higher incomes may help to boost the vitality and viability of the Wood Street town centre. However, such an approach could also increase levels of local housing deprivation through its failure to address the identified local need for affordable dwellings, so contributing to overall deprivation and related social problems (contributions in lieu may help to improve existing housing, but would not resolve the demand for new affordable housing). Areas of deprivation in Wood Street and their negative social consequences could work to undermine the attractiveness of Wood Street town centre to visitors and investors, so countering the positive effects of higher incomes within new developments. As such, this approach is least preferred as a result of the potential economic risk it entails.</p> <p>In comparison, Option One offers a flexible approach which will ensure that new development will not be unduly constrained by affordable housing requirements that cannot be delivered due to viability, whilst ensuring that affordable</p>	★ 1	2

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
	<p>dwellings are delivered where possible, or appropriately compensated for where they are not delivered to targeted levels. This should ensure that a rise in local spending power occurs without the intensification of existing problems in terms of overall and housing deprivation, leading to positive effects in terms of this SA objective.</p>		
22. Improve the local economy by attracting inward investment	<p>No significant effects are predicted for any of the alternatives put forward. Their relative merits can, however, be discussed. The approach set out by Option Two may increase spending power in the Wood Street area. This could result from the outmigration of those with lower incomes due to a lack of affordable housing, coupled with the larger numbers of higher income residents that could be accommodated in the absence of affordable housing provision. Higher incomes may help to boost the attractiveness of Wood Street to inward investors. However, such an approach could also increase levels of local housing deprivation through its failure to address the identified local need for affordable dwellings, so contributing to overall deprivation and related social problems (contributions in lieu may help to improve existing housing, but would not resolve the demand for new affordable housing). Areas of deprivation in Wood Street and their negative social consequences could work to undermine the attractiveness of Wood Street town centre to investors, so countering the positive effects of higher incomes within new developments. As such, this approach is least preferred as a result of the potential economic risk it entails.</p> <p>In comparison, Option One offers a flexible approach which will ensure that new development will not be unduly constrained by affordable housing requirements that cannot be delivered due to viability, whilst ensuring that such dwellings are delivered where possible or appropriately compensated for where they are not delivered to targeted levels. This should ensure that a rise in local spending power occurs without the intensification of existing of existing problems in terms of overall and housing deprivation, leading to positive effects in terms of this SA objective.</p>	★ 1	2
23. Maintain stable levels of employment in the Borough	<p>No significant effects are predicted for either of the alternatives. Nonetheless, their relative merits can be discussed. The approach set out by Option Two may increase spending power in the Wood Street area. This could result from the outmigration of those with lower incomes due to a lack of affordable housing, coupled with the larger numbers of higher income residents that could be accommodated in the absence of affordable housing provision. Higher incomes may help to boost the Wood Street economy, so supporting higher levels of employment. However, such an approach could also increase levels of local housing deprivation through its failure to address the identified local need for affordable dwellings, so contributing to overall deprivation and related social problems (contributions in lieu may help to improve existing housing, but would not resolve the demand for new affordable housing). Areas of deprivation in Wood Street and their negative social consequences could work to undermine the attractiveness of Wood Street town centre to businesses, visitors and investors, so countering the positive effects of higher incomes within new developments. As such, this approach is least preferred as a result of the potential economic risk it entails.</p>	★ 1	2

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
	In comparison, Option One offers a flexible approach which will ensure that new development will not be unduly constrained by affordable housing requirements that cannot be delivered due to viability, whilst ensuring that such dwellings are delivered where possible or appropriately compensated for where they are not delivered to targeted levels. This should ensure that a rise in local spending power occurs without the intensification of existing of existing problems in terms of overall and housing deprivation, leading to positive effects in terms of this SA objective.		
<p>Summary</p> <p>The approach set out in Option One is clearly the <u>preferred option</u> when considered against all relevant SA objectives. The policy’s flexibility should prevent any failure to deliver development as a result of viability concerns, whilst also ensuring that affordable housing is delivered wherever possible and that deferred contributions are received where it cannot be delivered. This may result in significant positive effects in terms of the delivery of homes to meet local housing need and in reducing deprivation. In addition, the creation of mixed-income communities encouraged through this approach could also help to tackle crime and the fear of crime and maintain or improve the wellbeing of Wood Street residents, whilst also increasing local incomes in a manner which may support the Wood Street town centres, inward investment, and local employment.</p> <p>In contrast it is considered possible that Option Two could result in a range of negative effects. At the root of these is the failure to address local and Borough-wide requirements for additional affordable housing. Significant negative effects in this respect include a failure to meet local needs for affordable housing, plus the negative consequences in terms of deprivation (overall and housing) and wellbeing that may result as a result of this failure. In addition, whilst it is considered possible that Option Two may increase spending power in the Wood Street area, with positive economic effects, this benefit could be outweighed by the negative social and associated economic impacts of a failure to address local affordable housing need. As such, this option is considered to be the least preferred in terms of the risk it may present to the viability and vitality of Wood Street town centre, levels of inward investment, and local employment.</p>			

APPENDIX VII: ALTERNATIVES APPRAISAL (CONNECTIONS)

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 'connections':

1. Creation of a pedestrian and cycle friendly environment where public transport is also supported
2. As per (1) but transform Wood Street into a one-way street or restrict central sections of Wood Street for car traffic altogether
3. Increase capacity of network following a 'predict and provide' 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 Preferred Options Consultation Document.

Methodology

For each of the alternatives, the appraisal identifies and evaluates 'likely significant effects' on the baseline / likely future baseline, drawing on the sustainability issues 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.⁴⁴

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.⁴⁵ 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.

⁴⁴ As stated by Government Guidance (The Plan Making Manual, see <http://www.pas.gov.uk/pas/core/page.do?pagelid=156210>):

"Ultimately, the significance of an effect is a matter of judgment and should require no more than a clear and reasonable justification."


⁴⁵ Environmental Assessment of Plans and Programmes Regulations 2004

Appraisal findings

Table presenting an appraisal of the following ‘Connections’ options:

- (1) Creation of a pedestrian and cycle friendly environment where public transport is also supported
- (2) As per (1) but transform Wood Street into a one-way street or restrict central sections of Wood Street for car traffic altogether
- (3) Increase capacity of network following a ‘predict and provide approach’

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	<u>Rank of preference</u>		
		Alt 1	Alt 2	Alt 3
1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	No implications.	-	-	-
2. Reduce crime and the fear of crime	<p>While none of the alternative options are expected to have any significant effects in terms of this objective, Options One and Two are expected to have some positive effects on the baseline therefore their relative merits can be discussed. Option One would support new development that priorities pedestrians and cyclists over cars and would restrict the amount of space used for car parking (thus increasing the scope for other forms of redevelopment that will generate greater levels of activity), as such this approach is expected to create more people-friendly streets, which should result in greater activity and footfall in Wood Street.</p> <p>Like Option One, Option Two would also prioritise pedestrian and cyclists over car use, however it could also potentially result in central sections of Wood Street becoming car free. This would reduce – and potentially completely prevent – car activity on central sections of Wood Street, which could have some negative effects on this objective particularly during non-working hours by reducing levels of activity on central parts of Wood Street. Option Three is not expected to have any significant implications in terms of this objective.</p>	★ 1	2	-
3. Improve standard of health and wellbeing of those who live	Options One and Two are predicted to have significant positive effects in terms of this objective by encouraging sustainable methods of transport, such as walking and cycling, over car use resulting in significant health and wellbeing benefits for those living and working in Wood Street. However the approach set out by Option 2 is likely to lead to some negative effects in terms of the social objectives by displacing traffic from Wood Street into less suitable streets including	★ 1	★ 1	2

and work in the Borough	<p>Shernhall Street, where a number of schools are located. Significant increases in traffic on these streets would likely raise safety issues.</p> <p>The approach set out by Option Three is expected to result in higher provision of residential car parking spaces as part of new developments and would also introduce additional visitor car parking. The increased car parking availability in Wood Street that would come with this approach is likely to encourage residents and visitors to make more journeys by car, rather than by walking or cycling, thus having negative effects on this objective.</p>			
4. Increase the provision of and access to community facilities to meet local cultural, recreational and social needs	No implications.	-	-	-
5. Improve educational attainment in schools	No implications.	-	-	-
6. Improve opportunities for access to education and training for all residents	No implications.	-	-	-
7. Reduce the overall level of deprivation	No implications.	-	-	-
8. Improve opportunities for access to local services, facilities and employment through an	<p>By seeking to improve the legibility and connectivity of new streets and by requiring new streets to be designed in a way that would prioritise pedestrians and cyclists (i.e. through the creation of Home Zones), Options One and Two would both provide increased opportunities for access to local services, facilities and employment, thus having significant positive effects on this objective. Option Two would also limit car access to central parts of Wood Street, therefore reducing the number of cars in the town centre which is likely to improve the capacity and efficiency of local bus services.</p> <p>In contrast, Option Three would seek to provide for additional car capacity by enabling an increase in car parking</p>	2		3

integrated sustainable transport system	provision and prioritising the creation of new roads and junction widening to meet the needs of car users, which is likely to increase the use of, and demand for, cars in the area. This approach is therefore predicted to have a significant negative effect in terms of this objective.			
9. Reduce production of waste and increase recycling	No implications.	-	-	-
10. Reduce greenhouse gas emissions	<p>The approaches set out by Options One and Two would promote measures that would prioritise the use of sustainable modes of transport (namely walking, cycling and public transport) over car use. Option Two would also seek to limit car use along the central parts of Wood Street by turning it into a one-way street, and potentially transform parts of it into a completely car-free zone. This approach would limit car access into the central part of Wood Street, and in doing so may encourage increased usage of buses and trains, particularly for those travelling to Wood Street from out with the AAP area. By placing greater restrictions on car users, Option Two is predicted to have the greatest benefits in terms of this objective.</p> <p>Option Three would seek to provide measures that would increase vehicle capacity at junctions and allow higher provision of residential and visitor car parking in Wood Street, which would be likely to lead to increased car use and is therefore expected to have a significant negative effect in terms of this objective.</p>	2	1	3
11. Conserve energy	No implications.	-	-	-
12. Improve air quality through a reduction in traffic-based emissions	<p>The approaches set out in Options One and Two will require the design of new streets to prioritise the needs of pedestrians and cyclists over car users. They will also both seek to create short and direct routes through new developments to make walking and cycling an easy and attractive option to residents. By increasing the accessibility and attractiveness of more sustainable forms of travel to those living and working in Wood Street, both approaches are expected to reduce car dependency and have a significant positive effect on this objective. However, Option Two is expected to result in the greatest environmental gains by providing either a one way street or a car-free zone along central parts of Wood Street, which is likely to encourage residents and visitors to use more sustainable modes of transport.</p> <p>By contrast, Option Three would enable higher provision of car parking spaces in Wood Street which is likely to lead to an increase in car usage (and potentially even demand) which in turn would result in increased traffic-based emissions in the area. This option is therefore predicted to have a significant negative effect in terms of this objective.</p>	2	1	3
13. Improve water quality	No implications.	-	-	-

and ensure the efficient use of water resources				
14. Reduce the risk of flooding	Wood Street is situated in Flood Zone 1 and has a low risk of flooding. As such, no significant effects are predicted in relation to this SA objective.	-	-	-
15. Reduce contamination and safeguard soil quality and quantity	No implications.	-	-	-
16. Make the best use of previously developed land (PDL) and existing buildings	<p>The alternative options presented are unlikely to result in any significant effects; however their relative merits can be discussed. Recent studies indicate that the existing car parking arrangements in Wood Street are underutilised thus suggesting that there is currently an overprovision of car parking spaces in the area. Options One and Two would both apply a maximum parking standard limit to new residential developments and would determine parking levels for individual developments on the basis of need in accordance with the Council's parking hierarchy, public transport accessibility levels (PTAL) and the travel plan. Both approaches should therefore ensure that land used for parking provision is provided only where a clear need for it can be demonstrated. As such both approaches are expected to result in positive effects against the baseline.</p> <p>By contrast, Option Three would either place no restrictions on parking provision or would create higher provision than that allowed by the Borough-wide Development Management policy. This approach is likely to result in a greater amount of land being used for car parking which would not represent an efficient use of PDL in the town centre and is therefore predicted to result in significant negative effects in terms of this objective.</p>	★ 1	★ 1	2
17. Conserve and enhance biodiversity	No implications.	-	-	-
18. Protect the ecological integrity of Natura 2000 sites	No implications.	-	-	-
19. Maintain and enhance the quality of the green belt and	No implications.	-	-	-

open space areas.				
20. Conserve and, where appropriate, enhance the historic environment	No implications.	-	-	-
21. Maintain and enhance the vitality and viability of the Borough's town centres	<p>By supporting the creation of more pedestrian-friendly and connected streets, Option One is expected to help to enhance accessibility to the town centre, which is likely to lead to increases in footfall and activity in the town centre which should help support local businesses.</p> <p>Option Two seeks to either create a one-way street on Wood Street or to restrict central sections of Wood Street for car traffic altogether. Although there is potential for this approach to have some negative effects on local businesses, the central part of Wood Street benefits from being in close proximity to the train station therefore any negative effects are predicted to be minor and outweighed by the benefits that will come with an enhanced and safer pedestrian zone. In addition, the restrictions imposed on car use should reduce traffic congestion in the area which would bring beneficial effects to the local economy in the long term.</p> <p>The approach set out by Option Three would make it easier for car drivers to park in the centre of Wood Street, which is likely to have some positive short term effects in terms of this objective, but in the long term is predicted to increase congestion in the area. In addition this approach may result in the creation of large areas of car parking in the town centre that are underutilised / inactive, particularly out with business hours. As such this approach is not expected to make a positive contribution to this objective overall and is the least preferable option.</p>	★ 1	2	3
22. Improve the local economy by attracting inward investment	<p>Although none of the alternative options put forward are likely to have a significant effect in terms of this SA objective, their relative merits can be discussed. By supporting the creation of more pedestrian-friendly and connected streets, Option One is expected to help to enhance accessibility to the town centre, which is likely to lead to increases in footfall and activity in the town centre which should help to improve the local economy by attracting inward investment.</p> <p>Option Two seeks to either create a one-way street on Wood Street or to restrict central sections of Wood Street for car traffic altogether. Although there is potential for this approach to have some negative effects on local businesses, the central part of Wood Street benefits from being in close proximity to the train station therefore any negative effects are predicted to be minor and outweighed by the benefits that will come with an enhanced and safer pedestrian zone. In addition, the restrictions imposed on car use should reduce traffic congestion in the area which would bring beneficial effects to the local economy in the long term.</p> <p>The approach set out by Option Three would make it easier for car drivers to park in the centre of Wood Street, which is likely to have some positive short term effects on this objective, but in the long term it is predicted to increase congestion</p>	★ 1	2	3

	in the area. In addition this approach may result in the creation of large areas of car parking in the town centre that are underutilised/inactive, particularly out with business hours. As such this approach is not expected to make a positive contribution to this objective overall and is the least preferable option.			
23. Maintain stable levels of employment in the Borough	No implications.	-	-	-

Summary

Of the approaches presented, **Option Two** is likely to result in the highest level of sustainability. In particular it is likely to have a number of environmental benefits by reducing greenhouse gas emissions (through restricting car parking provision and potentially completely restricting car access in central parts of Wood Street), improving air quality, and improving opportunities for access to local services, facilities and employment through an integrated sustainable transport system (through improving access routes for pedestrians and cyclists). It is also expected to have some **significant positive effects** in terms of the social objectives by improving the standard of health and wellbeing in the area (through encouraging sustainable methods of transport over car use). However the approach is also likely to lead to some negative effects in terms of the social objectives by displacing traffic from Wood Street into less suitable streets including Shernhall Street, where a number of schools are located. Significant increases in traffic on these streets would likely raise safety issues.

Option One also performs well across the objectives, particularly in terms of the environmental objectives, as well as some of the social objectives. In particular it is likely that the approach may help to reduce crime and the fear of crime by restricting the amount of space used for car parking which in turn should increase the scope for other forms of development to come forward thereby generating greater levels of activity and footfall in Wood Street. It is also considered the best option in terms of making the best use of previously developed land through ensuring that land used for parking provision is provided only where a clear need for it can be demonstrated.

The approach set out by **Option Three** performs the worst overall, but particularly against the environmental objectives. It is notable that it is predicted to lead to **significant negative effects** in terms of worsening air quality (through increasing provision of car parking in the town centre) and making inefficient use of previously developed land in the AAP area.

APPENDIX VIII: ALTERNATIVES APPRAISAL (SUSTAINABILITY AND 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 approaches to 'sustainability and energy':

1. Creation of a CHP and decentralised energy network
2. Focusing on energy efficiency and renewable energy generation to reduce carbon emissions and not drive decentralised energy forward in the area
3. Setting higher environmental targets and building design standards for Wood Street

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 Preferred Options Consultation Document.

Methodology

For each of the alternatives, the appraisal identifies and evaluates 'likely significant effects' on the baseline / likely future baseline, drawing on the sustainability issues 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.⁴⁶

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.⁴⁷ 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.

⁴⁶ As stated by Government Guidance (The Plan Making Manual, see <http://www.pas.gov.uk/pas/core/page.do?pagelid=156210>):

"Ultimately, the significance of an effect is a matter of judgment and should require no more than a clear and reasonable justification."


⁴⁷ Environmental Assessment of Plans and Programmes Regulations 2004

Appraisal findings

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	None of the options are expected to result in significant effects in terms of this sustainability objective; however their relative merits can be discussed. Option One would place a requirement on developers bringing forward residential schemes in the area to make a financial contribution to the creation and future connection to the DEN scheme but this requirement would not be expected to result in viability implications and is therefore not considered to have significant effects on this objective. Option Two is also not expected to have any significant effects on this objective as this approach would essentially comprise of a ‘business as usual approach’ to energy efficiency and renewable energy generation requirements. By setting even higher environmental and building design targets for Wood Street compared to the established targets set for the rest of the Borough, Option Three would be more sustainable than Options One and Two, but would come at a greater cost to developers in the short term and could potentially reduce the viability of residential schemes. Option Three may therefore result in fewer residential schemes coming forward in the AAP area, thus resulting in the delivery of less housing making it the least favourable approach in terms of this objective.	2	★ 1	3
2. Reduce crime and the fear of crime	No implications.	-	-	-
3. Improve standard of health and wellbeing of those who live and work in the Borough	No implications.	-	-	-
4. Increase the provision of and access to community facilities to meet local cultural, recreational and social needs	No implications.	-	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
5. Improve educational attainment in schools	No implications.	-	-	-
6. Improve opportunities for access to education and training for all residents	No implications.	-	-	-
7. Reduce the overall level of deprivation	No implications.	-	-	-
8. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system	No implications.	-	-	-
9. Reduce production of waste and increase recycling	Option One will look to make use of energy that what would otherwise be waste heat and so is expected to have positive effects on this objective. Meanwhile, the approaches set out in Options Two and Three are not likely to have any implications positive or negative in terms of this objective.	★ 1	2	2

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	<u>Rank of preference</u>		
		Alt 1	Alt 2	Alt 3
10. Reduce greenhouse gas emissions	<p>All three of the options are expected to have positive effects on this objective. By using waste heat to generate energy close to where it is consumed, the approach set out in Option One will decrease carbon dioxide emissions, reduce energy consumption and help secure affordable energy supply for Wood Street. This approach is therefore expected to have the most significant positive effects in terms of this SA objective, particularly in areas where there are concentrations of high density mixed use development which will support efforts to incorporate district heating.</p> <p>In the long term, Option Three is expected to perform better than Option Two in terms of this objective due to the fact that it would place higher environmental and sustainable design targets on new developments, thus resulting in the creation of more sustainable buildings across the Wood Street area which would help to reduce greenhouse gas emissions.</p>	★ 1	3	2
11. Conserve energy	<p>As with the objective above, all three options are expected to have positive effects in terms of conserving energy. Option One is expected to have the most significant positive effects in terms of this objective as the creation of a Decentralised Energy Network (DEN) and Combined Heat and Power (CHP) systems in Wood Street would enable energy to be generated closer to where it is consumed, thus limiting energy waste, while also enabling residents to control heating in their homes, thus enabling them to reduce energy consumption when it is not needed.</p>	★ 1	3	2
12. Improve air quality through a reduction in traffic-based emissions	No implications.	-	-	-
13. Improve water quality and ensure the efficient use of water resources	No implications.	-	-	-
14. Reduce the risk of flooding	Wood Street is situated in Flood Zone 1 and has a low risk of flooding. As such, no significant effects are predicted in relation to this SA objective.	-	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
15. Reduce contamination and safeguard soil quality and quantity	No implications.	-	-	-
16. Make the best use of previously developed land (PDL) and existing buildings	No implications.	-	-	-
17. Conserve and enhance biodiversity	No implications.	-	-	-
18. Protect the ecological integrity of Natura 2000 sites	There are no Natura 2000 sites located within the Wood Street AAP area however the Epping Forest SAC is located on the eastern edge of it. The level of impact is dependent on the location of development and its proximity to sensitive receptors, rather than the environmental and sustainable design standards prescribed to new development.	-	-	-
19. Maintain and enhance the quality of the green belt and open space areas.	No implications.	-	-	-
20. Conserve and, where appropriate, enhance the	There are no conservation areas located in the AAP area, however there are four listed buildings located in Wood Street, and a number of locally listed buildings. In terms of their relative merits, all three options would prescribe high environmental and sustainable design requirements (with Options One and Two maintaining the standards set out in the Development Management DPD) which is expected to lead to positive effects by providing a high quality townscape	2	2	

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
historic environment	where new development takes place. Option Three is expected to have the most beneficial impacts in terms of this objective by prescribing environmental and sustainable design standards that go beyond those set out in the Development Management DPD.			
21. Maintain and enhance the vitality and viability of the Borough's town centres	No implications.	-	-	-
22. Improve the local economy by attracting inward investment	None of the proposed approaches are expected to have significant implications in terms of this objective. However in terms of their relative merits, all three options are predicted to result in positive effects in terms of ensuring that new businesses in Wood Street would be operating within sustainable buildings; although the sustainability of individual businesses and Wood Street's economy will depend on factors other than sustainable design, such as location.	-	-	-
23. Maintain stable levels of employment in the Borough	No implications.	-	-	-
<p>Summary</p> <p>Of the three approaches put forward, Option One, with its requirement for new developments in the AAP area to connect to an existing or planned district heating network, to be "connection ready" for future networks and to make contributions towards the installation of an area wide district heating network in accordance with the DM Policies DPD, is the <u>strongest performing option overall</u>, and performs particularly well against the environmental objectives.</p> <p>It is notable however that Option Three is expected to have the most beneficial impacts in terms of conserving, and where possible enhancing, the historic environment by prescribing environmental and sustainable design standards that go beyond those set out in the Development Management DPD.</p> <p>None of the approaches are expected to produce any significant effects against the baseline in terms of the economic objectives. In terms of the social objectives, the approaches are also not expected to have any significant effects, although Option Two is expected to have the most beneficial effects in terms of helping to meet local housing need.</p>				

APPENDIX IX: ALTERNATIVES APPRAISAL (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 'open space':

1. Balance provision of private, communal and public open space in the AAP area
2. Maximise amount of open space in the AAP area
3. Maximise the amount of private space in the AAP area

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 Preferred Options Consultation Document.

Methodology

For each of the alternatives, the appraisal identifies and evaluates 'likely significant effects' on the baseline / likely future baseline, drawing on the sustainability issues 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.⁴⁸

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.⁴⁹ 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.



⁴⁸ As stated by Government Guidance (The Plan Making Manual, see <http://www.pas.gov.uk/pas/core/page.do?pagelid=156210>):

"Ultimately, the significance of an effect is a matter of judgment and should require no more than a clear and reasonable justification."

⁴⁹ Environmental Assessment of Plans and Programmes Regulations 2004




Appraisal findings

Table presenting an appraisal of the following 'Open space' options:				
(1) Balance provision of private, communal and public open space in the AAP area (2) Maximise amount of open space in the AAP area (3) Maximise the amount of private space in the AAP area				
SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	<p>Most parts of Wood Street benefit from good access to open space; however there is a notable lack of green space in Wood Street itself. Option One seeks to balance the provision of private, public and communal open space across the Wood Street area by requiring developers to provide private and communal external amenity space with new development in accordance with the standards set out in the Borough's Development Management DPD and by seeking developer contributions for the enhancement and maintenance of existing green infrastructure. This approach would not place an additional requirement on developers compared to what is already required across the rest of the Borough and is unlikely to have any significant negative impacts on development viability; therefore this approach is not expected to lead to any negative effects in terms of the objective.</p> <p>Option Two, by virtue of seeking to substantially increase the amount of public open space across the AAP area, would reduce the amount of developable land in Wood Street which would also reduce the amount of land that could be developed for residential use, therefore having a significant negative effect on this objective.</p> <p>The approach proposed by Option Three would seek to maximise the provision of private amenity space. This could lead to a reduction in housing densities across the Wood Street area which would have negative implications in terms of both development viability and in meeting local housing needs.</p>	★ 1	3	2
2. Reduce crime and the fear of crime	<p>While the approach to open space provision will not have as significant an effect on this objective as the approaches to place-making and design in Wood Street, the relative merits of the approaches to open space provision should be discussed. Within Waltham Forest, the Wood Street ward has amongst the highest crime rates. Epping Forest provides an important local open space resource that is located in close proximity to the AAP area; however current access routes to it from Wood Street are poor and badly lit.</p> <p>Option One seeks to tackle this issue by improving the pedestrian connections between Wood Street and Epping Forest, and between Epping Forest and other open spaces in the plan area which is predicted to result in a significant positive effect in terms of this objective. In addition, this approach would seek to balance the provision of private,</p>	★ 1	?	2

	<p>communal and public open space in new developments and would require play and recreational facilities to be placed at the heart of development proposals. This should ensure that where new open space is provided, it is overlooked, thus helping to reduce crime and the fear of crime in new developments. This approach also seeks to improve existing public open spaces, which will be particularly beneficial for the area around the Plaza, which is known to suffer from poor surveillance and perceptions of crime and anti-social behaviour. Consequently Alternative One is expected to have significant positive effects in terms of this objective.</p> <p>The effects that Option Two will have in terms of this objective are less clear as it will depend largely on the location and design of new open spaces.</p> <p>The approach proposed by Option Three contrasts significantly to Option One, in that it seeks to maximise the provision of private amenity space across the AAP area. This approach is expected to have limited benefits in terms of this objective as it will promote the provision of private amenity space over the provision of public space, thus limiting the provision of new open space that is overlooked or publicly accessible.</p>			
<p>3. Improve standard of health and wellbeing of those who live and work in the Borough</p>	<p>All three approaches are expected to have some positive effects in terms of this objective. Option One is expected to result in the creation of new public open spaces, as well as bring improvements to existing public open spaces. This should result in increased opportunities for informal and formal sports and recreation activities in the AAP area. This approach will also seek to improve the accessibility and safety of pedestrian and cycle routes between Wood Street and Epping Forest which should encourage increased use of these routes by residents, thus having a significant positive effect in terms of improving the health and wellbeing of local people.</p> <p>Option Two seeks to maximise the amount of open space in the AAP area through the creation of a large network of open spaces. Providing the new open space is easily accessible, this approach would also be expected to have significant positive effects in terms of this objective.</p> <p>While Option Three would also have beneficial impacts in terms of this objective, the effects would be less far-reaching than the approaches proposed by Alternatives One and Two, in that only those living in the new residential developments would be able to access and benefit from the new private amenity and communal open spaces.</p>		<p>2</p>	<p>3</p>
<p>4. Increase the provision of and access to community facilities to meet local cultural, recreational and social needs</p>	<p>Whilst none of the alternative options put forward are expected to result in a significant effect for this SA objective, it is possible to discuss their merits in general terms. None of the alternatives will result in increased provision of social infrastructure that will meet local cultural needs. However Option One should help to improve access to local resources such as Epping Forest as a result of improving the safety and accessibility of pedestrian and cycle routes to it. Option Two would be expected to improve green infrastructure across the AAP area which in turn could potentially improve access routes to community facilities across Wood Street, while also increasing provision of publically open space for recreational needs. This is in contrast to the approach set out by Option Three which is focused on maximising the creation of private amenity space and does not consider the social and cultural infrastructure needs of residents at the neighbourhood or ward level.</p>		<p>2</p>	<p>3</p>

5. Improve educational attainment in schools	No implications.	-	-	-
6. Improve opportunities for access to education and training for all residents	No implications.	-	-	-
7. Reduce the overall level of deprivation	<p>Whilst no significant effects are predicted for any of the alternative options put forward, their relative merits can be discussed.</p> <p>The approach to open space provision set out by Option One will promote a balanced approach to the provision of public and private amenity space across Wood Street. In doing so this approach should help to improve and enhance existing areas of open space which should enable an appropriate level of redevelopment activity across the Wood Street area which would have positive effects in terms of this objective.</p> <p>In contrast, Option Two would seek to maximise the amount of public open space across the AAP area which would constrain the amount of available land for redevelopment, thereby resulting in the lowest reduction in deprivation levels.</p> <p>Option Three seeks to maximise private amenity and communal space in Wood Street. The high private amenity space standards that this approach seeks is likely to have implications on the viability of development which could result in less development coming forward, thus potentially constraining redevelopment opportunities across Wood Street.</p>	★ 1	3	2
8. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system	No implications.	-	-	-
9. Reduce production of	No implications.	-	-	-

waste and increase recycling				
10. Reduce greenhouse gas emissions	No implications.	-	-	-
11. Conserve energy	No implications.	-	-	-
12. Improve air quality through a reduction in traffic-based emissions	No implications.	-	-	-
13. Improve water quality and ensure the efficient use of water resources	No implications.	-	-	-
14. Reduce the risk of flooding	Wood Street is situated in Flood Zone 1 and has a low risk of flooding. As such, no significant effects are predicted in relation to this SA objective.	-	-	-
15. Reduce contamination and safeguard soil quality and quantity	No implications.	-	-	-
16. Make the best use of previously developed land (PDL) and existing buildings	The balanced approach to the provision of public and private open space set out by Option One is expected to have a positive effect on this objective against the baseline. The approach will require new developments to provide high quality communal gardens and private open spaces, particularly in areas in the southern and northern part of Wood Street where there are known shortfalls. However it would also take a balanced approach to the requirements placed on developers by enabling developers to contribute to enhancing existing areas of open space, where meeting the Development Management policy space standards is not feasible.	1	3	2

	<p>Option Two, by maximising provision of open space across Wood Street, is the weakest of the approaches in terms of meeting this objective. The approach would restrict the amount of land that could be redeveloped thus limiting the amount of new development that could come forward over the plan period; therefore it is expected to have a significant negative effect on this sustainability objective.</p> <p>Option Three's focus on maximising provision of private amenity space would restrict the amount of developable land and would therefore perform less well than Option One against this objective.</p>			
<p>17. Conserve and enhance biodiversity</p>	<p>Of the three Options proposed, Option Two is expected to result in the greatest benefits in terms of this objective. The approach would seek to maximise the amount of open space created in the AAP area and would result in the creation of new Green Infrastructure corridors which would enhance biodiversity in the area, thus resulting in significant positive effects on this objective.</p> <p>Option One would also be expected to have positive effects on this objective by enhancing existing green infrastructure and ensuring that any new development would protect and enhance existing open spaces.</p> <p>Although Option Three is not expected to have any detrimental impacts against the objective, it is also not predicted to result in any significant beneficial impacts as the effects will be limited to individual developments, rather than at a larger scale.</p>	2		3
<p>18. Protect the ecological integrity of Natura 2000 sites</p>	<p>Option One seeks to improve accessibility to Epping Forest which would be expected to result in an increase in its use. A consequence of this approach is that it could potentially result in a negative effect on the site's integrity. However the approach would involve the Council working with the Corporation of London to ensure that access to Epping Forest is carefully managed. Furthermore, the approach seeks to enhance existing less sensitive sites of open space in the Wood Street area as a means of increasing the provision of alternative choices for residents to access open space.</p> <p>Option Two aims to create a large network of new open spaces across the plan area. Like Option One, this approach would result in the provision of alternative areas of publically accessible open space to Epping Forest, thereby reducing its usage, and thus impacts on it. Option Two is therefore expected to have the most significant positive effects in terms of this objective.</p> <p>Option Three is not expected to have any significant implications on this objective as it would limit open space provision to private amenity space as part of new development.</p>	2		3
<p>19. Maintain and enhance the quality of the green belt and open space areas</p>	<p>All three alternative options are expected to have a positive effect in relation to maintaining and enhancing Wood Street's open space areas. However by seeking to protect existing sensitive sites in the area, make improvements to existing public open space and create new public open space (in order to provide greater choice to residents and minimise pressure on the more sensitive sites), Option One offers the most targeted approach to achieving this objective.</p> <p>However of all three options, Option Two is predicted to result in the greatest provision of publicly open space and is therefore expected to have the most significant positive effects in terms of this objective against the baseline.</p>	2		3

	Option Three focuses on maximising provision of private amenity space but would place less emphasis on enhancing public areas of open space or on enhancing green infrastructure within Wood Street.			
20. Conserve and, where appropriate, enhance the historic environment	No implications.	-	-	-
21. Maintain and enhance the vitality and viability of the Borough's town centres	<p>Whilst no significant effects are predicted for any of the alternative options put forward, their relative merits can be discussed. Option One seeks to create new, and enhance existing, areas of public open space across Wood Street to provide alternative areas for recreational use. Improving the attractiveness of public open spaces, particularly those that are in key locations in Wood Street, is expected to have positive implications in terms of this objective by increasing activity and footfall to the area. The enhancement and creation of new areas of public open space, proposed by both Options One and Two, would also be expected to increase the attractiveness of Wood Street to potential investors which would make further positive contributions in terms of this objective. However Option Two would limit the amount of development that could take place across the Wood Street area, including the town centre, which would result in less redevelopment activity than the approach set out by Option One; as such it performs less well than Option One in terms of this objective.</p> <p>The approach set out by Option Three would focus on increasing the provision of private amenity space, with less focus on public space, and is therefore expected to make the least contribution to this objective.</p>	★1	2	3
22. Improve the local economy by attracting inward investment	<p>By increasing the provision and quality of publicly accessible open space, Options One and Two are expected to have a positive effect on this objective. Option One seeks to take a targeted approach to enhancing the appearance and quality of key areas of existing public open space, which should have knock-on effects in terms of attracting inwards investment. Option Two would result in the creation of new areas of connected open space which would be expected to have similar results in terms of increasing the attractiveness of the area to inward investment; however this approach would be more restrictive with regard to the amount of land that could come forward for development.</p> <p>Option Three would not be expected to have any significant effects on this objective against the baseline.</p>	★1	2	3
23. Maintain stable levels of employment in the Borough	No implications.	-	-	-

Summary

Of the alternative options presented, the approach set out in **Option One** is predicted to result in the highest level of sustainability overall. In particular, it may result

in significant **positive effects** in terms of reducing crime and the fear of crime (through the open space standards and targeted approach to enhancing open spaces that it sets out), and improving the standard of health and wellbeing of those who live and work in Wood Street (as a result of improving accessibility to Epping Forest and enhancing and providing new areas of public open space for recreational use). It is also expected to result in economic benefits by maintaining and enhancing the vitality and viability of Wood Street's town centre (through providing enhancements to existing areas of public open space and increasing activity and footfall in the town centre) and in improving the local economy by attracting inwards investment (through enhancing the appearance and quality of key areas of existing public open space). Overall, it is considered to be the preferable option in terms of the range of social and economic SA objectives it is likely to provide, and although it performs less well than **Option Two** against many of the environmental objectives, it is nonetheless expected to have some **positive effects** on these.

Option Two, with its emphasis on maximising provision of public open space through the creation of a large open space network, is expected to result in the greatest environmental gains by maintaining and enhancing areas of open space and protecting the ecological integrity of Epping Forest. However this option is also predicted to have some **significant negative effects** in terms of some of the social SA objectives, by constraining the amount of land that would be redeveloped in Wood Street, and by not making the best use of previously developed land.

Option Three, with its focus on maximising the provision of private amenity space, is not predicted to result in any significant negative effects against the objectives. However, overall this approach is predicted to offer the least benefits in terms of the SA objectives.

APPENDIX X: ALTERNATIVES APPRAISAL (EMPLOYMENT ON WOOD STREET)

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 'employment on Wood Street':

1. Protection of Borough employment sites; diversifying employment offer; and ensuring that employment uses are of a suitable type and nature to complement town centre uses
2. Creation of an employment hub in Wood Street

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 Preferred Options Consultation Document.

Methodology

For each of the alternatives, the appraisal identifies and evaluates 'likely significant effects' on the baseline / likely future baseline, drawing on the sustainability issues 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.⁵⁰

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.⁵¹ 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.



⁵⁰ As stated by Government Guidance (The Plan Making Manual, see <http://www.pas.gov.uk/pas/core/page.do?pagelid=156210>):

"Ultimately, the significance of an effect is a matter of judgment and should require no more than a clear and reasonable justification."

⁵¹ Environmental Assessment of Plans and Programmes Regulations 2004

Appraisal findings

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	<p>No significant effects are predicted for either of the alternative options presented. In terms of their relative merits, Option One would seek to intensify employment uses on existing employment sites, and in doing so would not seek to increase the amount of employment land in the Borough. This approach would allow mixed-use development (including residential uses) to come forward on employment sites, where development can demonstrate adequate provision of employment space. As a consequence this is predicted to facilitate the creation of additional residential space on some employment land in Wood Street, thus having a positive effect in terms of addressing local housing needs.</p> <p>By contrast, in addition to intensifying employment uses on existing employment sites, Option Two would seek to encourage clustering of employment uses on land adjacent to existing employment sites. An implication of this approach is that land with potential to provide housing may instead be developed for employment uses, thus potentially reducing the amount of land available for housing in Wood Street.</p>	★ 1	2
2. Reduce crime and the fear of crime	<p>No significant effects are predicted for either of the options presented. In terms of their relative merits, both approaches would encourage the intensification and diversification of employment uses on existing employment sites which is predicted to have benefits in terms of increasing activity around employment sites in Wood Street. However Option One would also allow for mixed-use development within employment sites where new development can demonstrate adequate provision of employment space through intensification of uses on site. As such this approach is expected to result in a greater mix of uses emerging in Wood Street compared to Option Two, and is predicted to lead to the creation of new developments with greater levels of activity and surveillance, particularly around Clifford Road and Barratt Road, thus being more likely to help to reduce crime and the fear of crime in these areas.</p>	★ 1	2
3. Improve standard of health and wellbeing of those who live and work in the Borough	No implications.	-	-
4. Increase the provision of and access to	The approach set out by Option One may help to improve access to community facilities as it will support mixed use development on employment sites (provided developments are able to provide adequate employment provision), and where it is considered viable, it will also encourage developers to provide community uses as part of new development,	★ 1	2

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
community facilities to meet local cultural, recreational and social needs	thus having a significant positive effect on this SA objective. By contrast, Option Two is not predicted to encourage provision of, or access to, community facilities; consequently it is not predicted to have any positive effects in terms of this objective.		
5. Improve educational attainment in schools	No implications.	-	-
6. Improve opportunities for access to education and training for all residents	No implications.	-	-
7. Reduce the overall level of deprivation	At the ward level, five out of the eight neighbourhoods in Wood Street are among 20% of the most deprived in England. The approaches set out by both options would encourage intensification and diversification of employment uses on employment sites in Wood Street which is predicted to increase job creation in the area. Option Two would also encourage clustering of employment uses on land adjacent to existing employment sites which could result in the creation of additional employment space in Wood Street thus potentially facilitating greater levels of job creation than Option One. However the approach proposed by Option One would allow mixed use development on employment sites where development can demonstrate an adequate provision of employment space, and would seek to encourage developers to provide community uses as part of new development. This approach is expected to result in a more balanced mix of uses in the area (including improving access to community uses) than Option Two and in doing so could help to reduce the overall level of deprivation in the area. On balance, both approaches are expected to play a role in helping to reduce the overall level of deprivation in the area but in different ways, with Option One encouraging a wider mix of uses and increasing access to community facilities, and		

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
	Option Two encouraging the creation of more employment opportunities for local residents.		
8. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system	No implications.	-	-
9. Reduce production of waste and increase recycling	No implications.	-	-
10. Reduce greenhouse gas emissions	<p>Whilst neither of the options put forward is predicted to result in a significant effect for this SA objective, it is possible to discuss their merits in general terms. Option One would encourage an intensification of uses on existing employment sites and would also facilitate the creation of mixed-use development on certain sites. Provision of mixed-use development would increase the scope for residents to live within close proximity to employment; thus increasing the likelihood of more journeys being made through sustainable modes of transport such as walking or cycling, with resulting reductions in greenhouse gas emissions.</p> <p>The approach set out by Option Two is also predicted to increase job creation for local people, which would enable a reduction in greenhouse gas emissions from transportation by reducing the number of residents travelling outside Wood Street to access work. However, by increasing the status of Wood Street as an employment hub and by promoting an increase in the number of businesses in the Wood Street area, this approach would also be expected to increase travel into the Wood Street area thus having a potentially negative effect on this objective.</p>	★ 1	2
11. Conserve energy	No implications.	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
12. Improve air quality through a reduction in traffic-based emissions	<p>Whilst neither option put forward is predicted to result in a significant effect for this SA objective, it is possible to discuss their merits in general terms. Option One would encourage an intensification of uses on existing employment sites and would also facilitate the creation of mixed-use development on certain sites. Provision of mixed-use development should increase the scope for residents to live within close proximity to employment; thus increasing the likelihood of more journeys being made through sustainable modes of transport such as walking or cycling.</p> <p>Option Two would also be expected to increase job opportunities for local people, which would enable a reduction in traffic-based emissions by reducing the number of residents travelling outside Wood Street to access work. However, by increasing the status of Wood Street as an employment hub and by promoting an increase in the number of businesses in the Wood Street area, this approach would also be expected to increase traffic-based travel into the Wood Street area thus having a potentially negative effect on this objective.</p>	★ 1	2
13. Improve water quality and ensure the efficient use of water resources	No implications.	-	-
14. Reduce the risk of flooding	Wood Street is situated in Flood Zone 1 and has a low risk of flooding. As such, no significant effects are predicted in relation to this SA objective.	-	-
15. Reduce contamination and safeguard soil quality and quantity	No implications.	-	-
16. Make the best use of previously developed land (PDL) and existing buildings	<p>Both approaches would seek to intensify and diversify employment uses on existing employment sites in Wood Street which would result in better use being made of these sites compared to the baseline situation. However the approach presented by Option One, by allowing mixed-use schemes to come forward where development can demonstrate adequate provision of employment space, takes a more flexible approach to redevelopment of employment sites, and is likely to increase the viability of development schemes, which in turn is predicted to increase the probability of new development coming forward. This approach is therefore expected to make better use of PDL and existing buildings than Option Two, which would restrict development on employment sites and adjacent sites to solely employment uses, and</p>	★ 1	2

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
	would also not seek intensification of employment uses on adjacent sites.		
17. Conserve and enhance biodiversity	No implications.	-	-
18. Protect the ecological integrity of Natura 2000 sites	No implications.	-	-
19. Maintain and enhance the quality of the green belt and open space areas.	No implications.	-	-
20. Conserve and, where appropriate, enhance the historic environment	<p>No significant impacts. Although there are no conservation areas in the Wood Street area, there are four listed buildings, of which one is Grade 2* listed and three Grade 2 listed. In addition, there are a number of locally listed buildings and a series of shop fronts that contribute to local character. Option One seeks to ensure that employment proposals protect the local amenity, have no significant adverse impact on the historic environment and will require all employment developments to be of a high quality design; consequently this approach is expected to have a positive impact on this objective. Option One would also only encourage an intensification of employment uses, rather than an intensification of space.</p> <p>By contrast Option Two would encourage clustering of employment uses on additional sites in Wood Street, a consequence of this is that more developments for employment use would be expected to be built which is likely to have a greater impact on the area's historic assets.</p>	★ 1	2
21. Maintain and enhance the vitality and viability of the	Waltham Forest has a lower than average small business survival rate (35% in 2010) when compared to both London (39.7%) and Great Britain (44.2%). This is of particular significance in the Wood Street area where the majority of businesses employ less than five people. Option One , by encouraging diversification of employment uses through encouraging developers to provide flexible office space and smaller units, and by allowing a mix of uses on employment	★ 1	2

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
Borough's town centres	<p>land, should deliver a greater number and variety of businesses in the town centre; thus helping to generate a wider range of employment opportunities and diversify the types of businesses in the area. This approach would also require development proposals for employment use to demonstrate that they would not have any significant adverse impacts on the function and vitality of Wood Street as a town centre. Option One is therefore expected to have significant positive effects in terms of this objective.</p> <p>The approach presented by Option Two would seek to create an employment hub for Wood Street, which while offering significant benefits in terms of increasing employment opportunities in the area, would not encourage a mix of uses on employment land. By restricting the types of uses on employment sites, this approach is predicted to have a less positive benefit in terms of the baseline.</p>		
22. Improve the local economy by attracting inward investment	<p>Both approaches are expected to have some positive effects in terms of this objective. Option One offers a flexible approach to development on employment sites by enabling the creation of mixed-use schemes which could help make development more viable and in turn increase the vitality of the town centre, which in turn would increase the attractiveness of the area to inward investment. This approach would also seek to encourage small-medium enterprises (SME) and creative and cultural industries to set up in the area thus diversifying the local economy and helping to address Wood Street's undersupply of small commercial units.</p> <p>While Option Two would seek the creation of an employment hub, which could help establish Wood Street's reputation as a place to do business and attract new businesses into the area, Wood Street is recognised as not being able to compete with other nearby centres including Stratford and Walthamstow Town Centre as an employment location.</p>	★ 1	2
23. Maintain stable levels of employment in the Borough	<p>Employment activity in Wood Street is slightly lower than both the Waltham Forest and London average, and there has been a small decrease in activity since 2006. Both approaches seek to intensify employment uses on existing employment sites which would have beneficial impacts in terms of this objective by increasing the number of job opportunities available in Wood Street.</p> <p>However Option Two should open up additional sites that are adjacent to existing employment sites for employment use (thereby creating a clustering effect), thus increasing the opportunity for new businesses to locate to the area and increasing job creation in Wood Street. As such it is the preferable option in terms of this objective.</p>	2	★ 1
<p>Summary</p> <p>Option One is predicted to have the <u>most positive effects</u> in terms of the SA objectives. With regards to the social objectives, it should help to increase local housing needs (through facilitating the creation of additional residential space on some employment land in Wood Street), reduce crime and the fear of crime</p>			

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
	<p>(through promoting the emergence of a greater mix of uses in Wood Street), and increase the provision of and access to community facilities to meet local cultural, recreational and social needs (through encouraging developers to provide community uses as part of new developments where it is viable). It is also expected to have some positive effects in terms of the environmental objectives by reducing greenhouse gas emissions and improving air quality (through the creation of mixed-use development). The approach presented by Option One is also expected to create economic benefits in terms of helping to maintain and enhance the vitality and viability of Wood Street's town centre (through encouraging diversification of employment uses) and help improve the local economy through attracting inward investment.</p> <p>The approach presented by Option Two performs significantly less well overall than Option One in terms of the SA objectives, nonetheless it is expected to create some benefits. For example it is predicted to help reduce deprivation and maintain stable levels of employment by encouraging clustering of employment uses on land adjacent to existing employment sites which could result in the creation of additional employment space in Wood Street thus potentially facilitating job creation.</p>		

APPENDIX XI: ALTERNATIVES APPRAISAL (CEDAR WOOD HOUSE)

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 the 'Cedar Wood House' site:

1. Retention of existing locally listed building with sensitive approach to renewal and refurbishment (with a preference for office use)
2. Comprehensive redevelopment

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 Preferred Options Consultation Document.

Methodology

For each of the alternatives, the appraisal identifies and evaluates 'likely significant effects' on the baseline / likely future baseline, drawing on the sustainability issues 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.⁵²

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.⁵³ 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.

⁵² As stated by Government Guidance (The Plan Making Manual, see <http://www.pas.gov.uk/pas/core/page.do?pagelid=156210>):

"Ultimately, the significance of an effect is a matter of judgment and should require no more than a clear and reasonable justification."

⁵³ Environmental Assessment of Plans and Programmes Regulations 2004

Appraisal findings

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	No significant effects are predicted for either of the options put forward. Nonetheless, their relative merits can be discussed in more general terms. Both of the alternatives put forward aim to accommodate between 6 and 13 residential units on site. This should help to contribute towards meeting local housing needs.	★ 1	★ 1
2. Reduce crime and the fear of crime	Whilst neither of the options presented are predicted to result in a significant effect, their relative merits can be discussed. The Cedar Wood House site is an area of deprivation in terms of crime. The mixed-use approach put forward by both alternatives should help to ensure continuous activity on the site, so potentially reducing crime and the fear of crime in the area.	★ 1	★ 1
3. Improve standard of health and wellbeing of those who live and work in the Borough	No implications.	-	-
4. Increase the provision of and access to community facilities to meet local cultural, recreational	No implications.	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
and social needs			
5. Improve educational attainment in schools	No implications.	-	-
6. Improve opportunities for access to education and training for all residents	No implications.	-	-
7. Reduce the overall level of deprivation	There are no significant effects predicted for either of the options. In terms of their relative merits, the site is currently used as an office for the Council and is in an area considered to be deprived. However, the Council has been considering its need for this office accommodation and so this site may become available in future. Both options seek to retain the site as employment use (ideally for office-use), albeit with a small shift towards mixed-use. This minor loss of employment space should have no impact on deprivation, whilst the focus of these policies on employment uses should ensure that deprivation in the area does not grow. It is possible that a failure to allow a comprehensive redevelopment of the site may reduce the site's viability, but given that the space is already used as office space this appears unlikely. As a result, there is nothing to distinguish these options in terms of this SA objective.		
8. Improve opportunities for access to local services, facilities and employment through an integrated	No significant effects are predicted for either of the options put forward. Their relative merits can, however, be discussed. The Cedar Wood House site is within an area of low public overall transport accessibility, as shown by its PTAL 2 rating. However, a bus stop is close to the site (3m away). As such, there should be opportunities for at least some access to services through sustainable transport as a result of either alternative. In addition, the level of residential development proposed by the alternatives takes into account the London Plan Density Matrix's suggested appropriate density given the areas PTAL level. This should help to prevent any adverse impacts on the local transport system.		

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
sustainable transport system			
9. Reduce production of waste and increase recycling	No implications.	-	-
10. Reduce greenhouse gas emissions	Whilst none of the options presented are predicted to result in a significant effect, their relative merits can be discussed. The Cedar Wood House site is within an area of low overall public transport accessibility, as shown by its PTAL 2 rating. However, a bus stop is close to the site (3m away). As such, there should be opportunities for at least some access to services through sustainable transport as a result of either option, so potentially limiting car use and associated greenhouse gas emissions. In addition, the level of residential development proposed by the options takes into account the London Plan Density Matrix's suggested appropriate density given the areas PTAL level. This should help to prevent increased greenhouse gas emissions as a result of congestion and increased car use.	★ 1	★ 1
11. Conserve energy	No implications.		
12. Improve air quality through a reduction in traffic-based emissions	Whilst neither of the options presented are predicted to result in a significant effect, their relative merits can be discussed. The Cedar Wood House site is within an area of low overall public transport accessibility, as shown by its PTAL 2 rating. However, a bus stop is close to the site (3m away). As such, there should be opportunities for at least some access to services through sustainable transport, so potentially limiting car use and associated emissions. In addition, the level of residential development proposed by the options takes into account the London Plan Density Matrix's suggested appropriate density given the areas PTAL level. This should help to prevent increased emissions as a result of congestion and increased car use.	★ 1	★ 1
13. Improve water quality and ensure the efficient use of water	No implications.	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
resources			
14. Reduce the risk of flooding	Wood Street is situated in Flood Zone 1 and has a low risk of flooding. As such, no significant effects are predicted in relation to this SA objective.	-	-
15. Reduce contamination and safeguard soil quality and quantity	No implications.	-	-
16. Make the best use of previously developed land (PDL) and existing buildings	The reuse of the existing Cedar Wood House building is proposed by Option One , and as such will result in significant positive effects in terms of this sustainability objective. This is in contrast to Option Two , which would result the loss of the building. Given that the building is currently fit for employment use (as offices) and is to be targeted at similar uses in future it appears unnecessary for it to be lost through a comprehensive redevelopment. As such, Option Two could lead to significant negative effects in terms of this SA objective.	★ 1	2
17. Conserve and enhance biodiversity	No implications.	-	-
18. Protect the ecological integrity of Natura 2000 sites	No implications.	-	-
19. Maintain and enhance the quality of the green belt and open	No implications.	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
space areas.			
20. Conserve and, where appropriate, enhance the historic environment	The Cedar Wood House building is considered to be of local importance from a built environment perspective, a view which is reflected in its locally listed status. With this being the case, Option One is considered to be a strong approach due to its focus on the renewal and refurbishment of the retained building in a sensitive manner. This is predicted to result in significant positive effects in terms of this SA objective as it is likely to enhance Wood Street's historic environment. This is in contrast to Option Two , which would result in the loss of the Cedar Wood House building. Such a loss would represent a failure to preserve the local heritage of the area and so would result in significant negative effects against the baseline.	★ 1	2
21. Maintain and enhance the vitality and viability of the Borough's town centres	No implications.	-	-
22. Improve the local economy by attracting inward investment	Whilst neither of the options presented are predicted to result in a significant effect, their relative merits can be discussed. In terms of the relative merits of the options, the site is currently used as an office for the Council. However, the Council has been considering its need for this office accommodation and so this site may become available in future. Both alternatives seek to retain the site as employment use (ideally for office-use), albeit with a small shift towards mixed-use. Both of the alternatives should lead to an improvement in the condition of the site and so the surrounding area. This may help to encourage inward investment. It is possible that a failure to allow a comprehensive redevelopment of the site may reduce the sites viability and so could discourage some investors, but given that the site is already used as office space this appears unlikely. As a result, there is nothing to distinguish these alternatives in terms of this SA objective.	★ 1	★ 1
23. Maintain stable levels of employment in the Borough	There are no significant effects predicted for any of the alternatives. In terms of the relative merits of the alternatives, the site is currently used as an office for the Council. However, the Council has been considering its need for this office accommodation and so this site may become available in future. Both options seek to retain the site as employment use (ideally for office-use), albeit with a small shift towards mixed-use. This minor loss of employment space should have no serious impact on employment levels, whilst the focus of these policies on employment uses should ensure that unemployment in the area does not grow. It is possible that a failure to allow a comprehensive redevelopment of the site may reduce the sites viability to developers, but given that the site is already used as office space this appears unlikely. As a result, there is nothing to distinguish these options in terms of this	★ 1	★ 1

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
SA objective.			
<p>Summary</p> <p><u>Both options put forward</u> should be capable of helping to address local housing need, tackling crime and the fear of crime in the vicinity of the site, preventing transport congestion and associated environmental impacts. They should also help to bring inward investment and prevent losses in employment and increased local deprivation.</p> <p>In terms of the merits of each of the options, it is notable that Option One seeks to preserve and sensitively enhance the existing Cedar Wood House, so resulting in significant positive effects in terms of making best use of existing buildings and enhancing the historic environment of Wood Street. In comparison, the comprehensive redevelopment of Option Two would lead to the loss of the building, so leading to significant negative effects against these same SA objectives.</p>			

APPENDIX XII: ALTERNATIVES APPRAISAL (GOSS COMPONENTS)

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 the 'Goss Component Site':

1. Intensification via mixed use development to include employment and residential uses
2. Retail use
3. 100% residential
4. 100% employment

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 Preferred Options Consultation Document.

Methodology

For each of the alternatives, the appraisal identifies and evaluates 'likely significant effects' on the baseline / likely future baseline, drawing on the sustainability issues 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.⁵⁴

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.⁵⁵ 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.

⁵⁴ As stated by Government Guidance (The Plan Making Manual, see <http://www.pas.gov.uk/pas/core/page.do?pagelid=156210>):

"Ultimately, the significance of an effect is a matter of judgment and should require no more than a clear and reasonable justification."

⁵⁵ Environmental Assessment of Plans and Programmes Regulations 2004

Appraisal findings

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference			
		Alt 1	Alt 2	Alt 3	Alt 4
1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	The Goss Component Site area is regarded as being in an area of housing deprivation. Of the options presented, the approach set out through Option Three is most likely to help in the meeting of local housing. Although dependent somewhat on the density of housing that would be pursued, the reallocation of the entire if this site to residential uses would be likely to result in significant positive effects in terms of this SA objective. Of the remaining approaches, Option One is likely to have positive effects as it seeks to provide between 50 and 110 units (subject to levels of employment use) on the site through intensification (with higher densities to be potentially pursued subject to design considerations). Whilst Options Two and Four would not result in a decline in housing availability in the area, they could represent a missed opportunity to contribute towards meeting local housing need.	2	3	★ 1	3
2. Reduce crime and the fear of crime	Whilst none of the options presented are predicted to result in a significant effect, their relative merits can be discussed. The Goss Component site is an area of deprivation in terms of crime. The mixed-use approach put forward Option One should help to ensure that there is continuous activity on the site, so potentially reducing crime and the fear of crime in the area. In contrast the remaining options are likely to lead to periods of time where the site is relatively deserted (i.e. in or out of business hours), so reducing levels of natural surveillance in the area.	★ 1	2	2	2
3. Improve standard of health and wellbeing of those who live and work in the Borough	No implications.	-	-	-	-
4. Increase the provision of and access to community facilities to meet local cultural,	No implications.	-	-	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference			
		Alt 1	Alt 2	Alt 3	Alt 4
recreational and social needs					
5. Improve educational attainment in schools	No implications.	-	-	-	-
6. Improve opportunities for access to education and training for all residents	No implications.	-	-	-	-
7. Reduce the overall level of deprivation	The Goss Component site currently has an employment function and is located within an area considered to suffer from a high level of overall deprivation. Given this, the loss of local employment that would result from the conversion of the site fully into residential use (Option Three) could result in significant negative effects against the baseline. The remaining options would not lead to any loss of employment capacity. This includes Option One, which looks to protect the employment opportunities offered by the site despite the inclusion of residential units. It aims to achieve this through a process of intensification which will result in at least the same number of jobs being provided on the site. However, Option Two's focus on converting the site to retail uses may undermine the town centre of Wood Street by working against attempts to consolidate such uses in the District Centre. As a result, this option could have localised benefits in terms of deprivation, but negative effects when considering the wider Wood Street area. Option Four represents a continuation of the current use of the site and so should also not result in any loss of employment capacity, although it would not bring additional housing to the area and the corresponding positive economic effects that could follow.	★ 1	3	4	2
8. Improve opportunities for access to local services,	No significant effects are predicted for any of the alternatives put forward. Their relative merits can, however, be discussed. The Goss Component site is within an area of low public overall transport accessibility, as shown by its PTAL 2 rating. However, a bus stop is close to the site (11m away). As such, there should be opportunities for at least some access to services through sustainable transport. By pursuing a mixed-development approach, Alternative One	★ 1	2	2	2

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference			
		Alt 1	Alt 2	Alt 3	Alt 4
facilities and employment through an integrated sustainable transport system	may help to reduce the need to travel for employment and services, so potentially relieving pressure on the transport system. As such, it is considered to be the preferred alternative for this SA objective.				
9. Reduce production of waste and increase recycling	No implications.	-	-	-	-
10. Reduce greenhouse gas emissions	No significant effects are predicted for any of the alternatives put forward. Their relative merits can, however, be discussed. The Goss Component site is within an area of low public overall transport accessibility, as shown by its PTAL 2 rating. However, a bus stop is close to the site (11m away). As such, there should be opportunities for at least some access to services through sustainable transport. By pursuing a mixed-development approach, Option One may help to reduce the need to travel for employment and services, so potentially reducing the use of transport and the emissions that can be associated with it. As such, it is considered to be the preferred option for this SA objective.	★ 1	2	2	2
11. Conserve energy	No implications.	-	-	-	-
12. Improve air quality through a reduction in traffic-based emissions	No significant effects are predicted for any of the options put forward. Their relative merits can, however, be discussed. The Goss Component site is within an area of low public overall transport accessibility, as shown by its PTAL 2 rating. However, a bus stop is close to the site (11m away). As such, there should be opportunities for at least some access to services through sustainable transport. By pursuing a mixed-development approach, Option One may help to reduce the need to travel for employment and services, so potentially reducing the use of transport and the emissions that can be associated with it. As such, it is considered to be the preferred option for this SA objective.	★ 1	2	2	2
13. Improve water quality and ensure	No implications.	-	-	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference			
		Alt 1	Alt 2	Alt 3	Alt 4
the efficient use of water resources					
14. Reduce the risk of flooding	Wood Street is situated in Flood Zone 1 and has a low risk of flooding. As such, no significant effects are predicted in relation to this SA objective.	-	-	-	-
15. Reduce contamination and safeguard soil quality and quantity	No implications.	-	-	-	-
16. Make the best use of previously developed land (PDL) and existing buildings	No implications.	-	-	-	-
17. Conserve and enhance biodiversity	No implications.	-	-	-	-
18. Protect the ecological integrity of Natura 2000 sites	No implications.	-	-	-	-
19. Maintain and enhance the quality of	No implications.	-	-	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference			
		Alt 1	Alt 2	Alt 3	Alt 4
the green belt and open space areas.					
20. Conserve and, where appropriate, enhance the historic environment	No implications.	-	-	-	-
21. Maintain and enhance the vitality and viability of the Borough's town centres	The conversion of the Goss Component site into full retail use (Option Two) could undermine the Wood Street town centre by working against attempts to concentrate retail in the District Centre. As a result, this alternative could result in significant negative effects against the baseline. In contrast, the remaining Options should not result in a pattern of use that affects the core retail area and so are preferred in this instance. In particular, the pursuit of a fully residential conversion of the site through Option Three would be most likely to support the town centres retail and wider offerings.	2	3	1	2
22. Improve the local economy by attracting inward investment	No significant effects are predicted for any of the options put forward. Their relative merits can, however, be discussed. Of the approaches put forward, Option Two is considered the least likely to bring about improvements to the local economy through increased inward investment. This is due to its focus on converting the site to retail uses may undermine the town centre of Wood Street by working against attempts to consolidate such uses in the District Centre. Any decline in the vitality and viability of the centre may make the Wood Street area less attractive to inward investment. Option Three meanwhile would lead to a loss of employment space, which in turn may create a less attractive location for investment. However, the provision of a high quantum of residential units here might help to support growth and investment in the town centre. Given the site's current use, Option Four should have no effect on inward investment levels, but could represent a missed opportunity to boost housing levels and so support growth elsewhere in the plan area. Overall, Option One is considered to be the preferred approach as it looks to provide opportunities for investment in business on the site whilst also allowing for housing growth that may help to support Wood Street town centre.	1	4	3	2

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference			
		Alt 1	Alt 2	Alt 3	Alt 4
23. Maintain stable levels of employment in the Borough	<p>The Goss Component site currently has an employment function. Given this, the loss of local employment that would result from the conversion of the site fully into residential use (Option Three) could result in significant negative effects against the baseline. The remaining options would not lead to any loss of employment capacity. This includes Option One, which looks to protect the employment opportunities offered by the site despite the inclusion of residential units. It aims to achieve this through a process of intensification which will result in at least the same number of jobs being provided on the site.</p> <p>However, Option Two's focus on converting the site to retail uses may undermine the town centre of Wood Street by working against attempts to consolidate such uses in the District Centre. As a result, this option could have localised benefits in terms of employment, but negative effects when considering the wider Wood Street area.</p> <p>Option Four represents a continuation of the current use of the site and so should also not result in any loss of employment capacity, although it would not bring additional housing to the area and the corresponding positive economic effects (with associated employment gains) that could follow.</p>	★ 1	2	3	★ 1
<p>Summary</p> <p>Of the approaches put forward, Option One is <u>considered to be the strongest</u> when considered against all SA objectives. It is likely to have positive effects in terms of meeting housing need, crime reduction, tackling deprivation, maintaining local employment, attracting inward investment, supporting the town centre, and encouraging more sustainable transport patterns. This is primarily a result of its mixed use approach, which encourages both housing growth and employment use through intensification.</p> <p>Of the remaining alternative options, Options Two and Three are considered to be least preferable. Whilst Option Three could result in significant positive effects in terms of meeting local housing need and could provide benefits to Wood Street town centre, the loss of local employment space this would trigger may lead to significant negative effects in relation to employment and associated deprivation. Meanwhile, the pursuit of retail uses alone through Option Two could undermine the Wood Street town centre and so reduce its viability.</p> <p>Finally, Option Four's suggested employment use of the site would offer little change from the status quo, and so could represent a missed opportunity to bring housing growth to the area (with associated economic benefits) and would not improve levels of natural surveillance.</p>					

APPENDIX III: ALTERNATIVES APPRAISAL (WALTHAMSTOW BUSINESS 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 the 'Walthamstow Business Centre' site:

1. Intensification by a mixed use development to include employment (business) and residential uses.
2. 100% employment
3. 100% residential

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 Preferred Options Consultation Document.

Methodology

For each of the alternatives, the appraisal identifies and evaluates 'likely significant effects' on the baseline / likely future baseline, drawing on the sustainability issues 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.⁵⁶

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.⁵⁷ 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.

⁵⁶ As stated by Government Guidance (The Plan Making Manual, see <http://www.pas.gov.uk/pas/core/page.do?pagelid=156210>):

"Ultimately, the significance of an effect is a matter of judgment and should require no more than a clear and reasonable justification."

⁵⁷ Environmental Assessment of Plans and Programmes Regulations 2004

Appraisal findings

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	The Walthamstow Business Centre area is regarded as being in an area of housing deprivation. Of the options presented, the approach set out through Option Three is most likely to help in the meeting of local housing. Although dependent somewhat on the density of housing that would be pursued, the reallocation of the entire of this site to residential uses would be likely to result in significant positive effects in terms of this SA objective. Of the remaining approaches, Option One is likely to have positive effects as it seeks to incorporate residential uses through intensification (although densities are not specified). Whilst Option Two would not result in a decline in housing availability in the area, it could represent a missed opportunity to contribute towards meeting local housing need.	2	3	
2. Reduce crime and the fear of crime	Whilst none of the options presented are predicted to result in a significant effect, their relative merits can be discussed. The Walthamstow Business Centre site is an area of deprivation in terms of crime. The mixed-use approach put forward Option One should help to ensure that there is continuous activity on the site, so potentially reducing crime and the fear of crime in the area. In contrast the remaining options are likely to lead to periods of time where the site is relatively deserted (i.e. in or out of business hours), so reducing levels of natural surveillance in the area.		2	2
3. Improve standard of health and wellbeing of those who live and work in the Borough	No implications.	-	-	-
4. Increase the provision of and access to community facilities to meet local cultural, recreational	No implications.	-	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
and social needs				
5. Improve educational attainment in schools	No implications.	-	-	-
6. Improve opportunities for access to education and training for all residents	No implications.	-	-	-
7. Reduce the overall level of deprivation	Walthamstow Business Centre currently has an employment function, is considered to be relatively successful, and is located within an area considered to suffer from a high level of overall deprivation. Given this, the loss of local employment that would result from the conversion of the site fully into residential use (Option Three) could result in significant negative effects against the baseline. The remaining options would not lead to any loss of employment capacity. This includes Option One , which looks to protect the employment opportunities offered by the site despite the inclusion of residential units. It aims to achieve this through a process of intensification which will result in at least the same number of jobs being provided on the site. Option Two represents a continuation of the current use of the site and so should also not result in any loss of employment capacity, although it would not bring additional housing to the area and the corresponding positive economic effects that could follow.	★ 1	2	3
8. Improve opportunities for access to local services, facilities and employment through an integrated	No significant effects are predicted for any of the options put forward. However, their relative merits can be discussed. A bus stop is distant from the site (71m away). As such, there may be some challenges in accessing the site using sustainable transport. By pursuing a mixed-development approach, Option One may help to reduce the need to travel for employment and services, so potentially relieving pressure on the transport system. As such, it is considered to be the preferred alternative for this SA objective.	★ 1	2	2

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
sustainable transport system				
9. Reduce production of waste and increase recycling	No implications.	-	-	-
10. Reduce greenhouse gas emissions	Although no significant effects are predicted for any of the options put forward, their relative merits can be discussed. A bus stop is distant from the site (71m away). As such, there may be some challenges in accessing the site using sustainable transport. By pursuing a mixed-development approach, Option One may help to reduce the need to travel for employment and services, so potentially reducing the use of transport and the emissions that can be associated with it. As such, it is considered to be the preferred option for this SA objective.	★ 1	2	2
11. Conserve energy	No implications.	-	-	-
12. Improve air quality through a reduction in traffic-based emissions	Whilst none of the options presented are predicted to result in a significant effect, their relative merits can be discussed. A bus stop is distant from the site (71m away). As such, there may be some challenges in accessing the site using sustainable transport. By pursuing a mixed-development approach, Option One may help to reduce the need to travel for employment and services, so potentially reducing the use of transport and the emissions that can be associated with it. As such, it is considered to be the preferred option for this SA objective.	★ 1	2	2
13. Improve water quality and ensure the efficient use of water resources	No implications.	-	-	-
14. Reduce the risk of flooding	Wood Street is situated in Flood Zone 1 and has a low risk of flooding. As such, no significant effects are predicted in relation to this SA objective.	-	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
15. Reduce contamination and safeguard soil quality and quantity	No implications.	-	-	-
16. Make the best use of previously developed land (PDL) and existing buildings	No implications.	-	-	-
17. Conserve and enhance biodiversity	No implications.	-	-	-
18. Protect the ecological integrity of Natura 2000 sites	No implications.	-	-	-
19. Maintain and enhance the quality of the green belt and open space areas.	No implications.	-	-	-
20. Conserve and, where appropriate, enhance the	No implications.	-	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
historic environment				
21. Maintain and enhance the vitality and viability of the Borough's town centres	Although no significant effects are predicted for any of the options put forward, their relative merits can be discussed. The options under consideration should not result in a pattern of use that affects the core retail area of Wood Street town centre. In particular, the pursuit of a fully residential conversion of the site through Option Three would be most likely to support the town centres retail and wider offerings.	2	2	★ 1
22. Improve the local economy by attracting inward investment	No significant effects are predicted for any of the alternatives put forward. Their relative merits can, however, be discussed. Option Three is the least preferred option as it would lead to a loss of employment space, which in turn may create a less attractive location for investment. However, it is notable that the provision of a high quantum of residential units here might help to support growth and investment in the town centre. Given the sites current use, Option Two should have no effect on inward investment levels, but could represent a missed opportunity to boost housing levels and so support growth elsewhere in the plan area. Overall, Option One is considered to be the preferred approach as it looks to provide opportunities for investment in business on the site whilst also allowing for housing growth that may help to support Wood Street town centre.	★ 1	2	3
23. Maintain stable levels of employment in the Borough	Walthamstow Business Centre currently has an employment function and is considered to be relatively successful. Given this, the loss of local employment that would result from the conversion of the site fully into residential use (Option Three) could result in significant negative effects against the baseline. The remaining options would not lead to any loss of employment capacity. This includes Option One , which looks to protect the employment opportunities offered by the site despite the inclusion of residential units. It aims to achieve this through a process of intensification which will result in at least the same number of jobs being provided on the site. Option Two represents a continuation of the current use of the site and so should also not result in any loss of employment capacity, although it would not bring additional housing to the area and the corresponding positive economic effects (with associated employment gains) that could follow.	★ 1	2	3
<p>Summary</p> <p>The approach set out through Option One is <u>considered to be the strongest</u> when considered against all SA objectives. This option is likely to bring about positive effects in relation to meeting housing need, crime reduction, tackling deprivation, maintaining local employment, attracting inward investment, supporting the town centre, and encouraging more sustainable transport patterns. This is primarily a result of its mixed use approach, which encourages both housing growth and employment use through intensification.</p> <p>Of those remaining, Option Three is considered to be the least preferable. Whilst this option could result in significant positive effects in terms of meeting local</p>				

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	<u>Rank of preference</u>		
		Alt 1	Alt 2	Alt 3
	<p>housing need and could provide support to the Wood Street town centre, the loss of local employment space this would trigger may lead to significant negative effects in relation to employment and associated deprivation.</p> <p>Finally, Option Two's suggested employment use of the site would offer little change from the status quo, and so could represent a missed opportunity to bring housing growth to the area (with associated economic benefits) and would not improve levels of natural surveillance.</p>			

APPENDIX XIV: ALTERNATIVES APPRAISAL (ARDLEIGH WORKS)

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 the 'Ardleigh Works' site:

1. Mixed use development to include employment (businesses and office use and ancillary uses) and residential uses
2. 100% employment
3. 100% residential

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 Preferred Options Consultation Document.

Methodology

For each of the alternatives, the appraisal identifies and evaluates 'likely significant effects' on the baseline / likely future baseline, drawing on the sustainability issues 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.⁵⁸

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.⁵⁹ 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.

⁵⁸ As stated by Government Guidance (The Plan Making Manual, see <http://www.pas.gov.uk/pas/core/page.do?pagelid=156210>):

"Ultimately, the significance of an effect is a matter of judgment and should require no more than a clear and reasonable justification."

⁵⁹ Environmental Assessment of Plans and Programmes Regulations 2004

Appraisal findings

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	The Ardleigh Works area is regarded as being in an area of housing deprivation. Of the options presented, the approach set out through Option Three is most likely to help in the meeting of local housing need. Although dependent somewhat on the density of housing that would be pursued, the reallocation of the entire site to residential uses would be likely to result in significant positive effects in terms of this SA objective. Of the remaining approaches, Option Two is likely to have positive effects as it seeks to provide between 25 and 60 units (subject to levels of employment use) on the site through intensification. Meanwhile, whilst Option Two would not result in a decline in housing availability in the area, it could represent a missed opportunity to contribute towards meeting local housing need.	2	3	
2. Reduce crime and the fear of crime	Whilst none of the alternatives presented are predicted to result in a significant effect, their relative merits can be discussed. The Ardleigh Works site is an area of deprivation in terms of crime. The mixed-use approach put forward Alternative One should help to ensure that there is continuous activity on the site, so potentially reducing crime and the fear of crime in the area. In contrast the remaining Alternatives are likely to lead to periods of time where the site is relatively deserted (i.e. in or out of business hours), so reducing levels of natural surveillance in the area.		2	2
3. Improve standard of health and wellbeing of those who live and work in the Borough	No implications.	-	-	-
4. Increase the provision of and access to community facilities to meet local cultural, recreational	No implications.	-	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
and social needs				
5. Improve educational attainment in schools	No implications.	-	-	-
6. Improve opportunities for access to education and training for all residents	No implications.	-	-	-
7. Reduce the overall level of deprivation	The Ardleigh Works site currently has an employment function and is located within an area considered to suffer from a high level of overall deprivation. Given this, the loss of local employment that would result from the conversion of the site fully into residential use (Option Three) could result in significant negative effects against the baseline. The remaining options would not lead to any loss of employment capacity. This includes Option One , which looks to protect the employment opportunities offered by the site despite the inclusion of residential units. It aims to achieve this through a process of intensification which will result in at least the same number of jobs being provided on the site. Option Two represents a continuation of the current use of the site and so should also not result in any loss of employment capacity, although it would not bring additional housing to the area and the corresponding positive economic effects that could follow.	★ 1	2	3
8. Improve opportunities for access to local services, facilities and employment through an integrated sustainable	No significant effects are predicted for any of the options put forward. Their relative merits can, however, be discussed. The Ardleigh Works site is within an area of low public overall transport accessibility, as shown by its PTAL 2 rating. The nearest bus stop is distant from the site (110 metres). By pursuing a mixed-development approach, Option One may help to reduce the need to travel for employment and services, so potentially relieving pressure on the transport system. As such, it is considered to be the preferred alternative for this SA objective.	★ 1	2	2

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
transport system				
9. Reduce production of waste and increase recycling	No implications.	-	-	-
10. Reduce greenhouse gas emissions	No significant effects are predicted for any of the options put forward. Their relative merits can, however, be discussed. The Ardleigh Works site is within an area of low public overall transport accessibility, as shown by its PTAL 2 rating. The nearest bus stop is distant from the site (110 metres). By pursuing a mixed-development approach, Option One may help to reduce the need to travel for employment and services, so potentially reducing the use of transport and the emissions that can be associated with it. As such, it is considered to be the <u>preferred option</u> for this SA objective.	★ 1	2	2
11. Conserve energy	No implications.	-	-	-
12. Improve air quality through a reduction in traffic-based emissions	No significant effects are predicted for any of the options put forward. Their relative merits can, however, be discussed. The Ardleigh Works site is within an area of low public overall transport accessibility, as shown by its PTAL 2 rating. The nearest bus stop is distant from the site (110 metres). By pursuing a mixed-development approach, Option One may help to reduce the need to travel for employment and services, so potentially reducing the use of transport and the emissions that can be associated with it. As such, it is considered to be the <u>preferred option</u> for this SA objective.	★ 1	2	2
13. Improve water quality and ensure the efficient use of water resources	No implications.	-	-	-
14. Reduce the risk of flooding	Wood Street is situated in Flood Zone 1 and has a low risk of flooding. As such, no significant effects are predicted in relation to this SA objective.	-	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
15. Reduce contamination and safeguard soil quality and quantity	No implications.	-	-	-
16. Make the best use of previously developed land (PDL) and existing buildings	No implications.	-	-	-
17. Conserve and enhance biodiversity	No implications.	-	-	-
18. Protect the ecological integrity of Natura 2000 sites	No implications.	-	-	-
19. Maintain and enhance the quality of the green belt and open space areas.	No implications.	-	-	-
20. Conserve and, where appropriate, enhance the	No implications.	-	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
historic environment				
21. Maintain and enhance the vitality and viability of the Borough's town centres	Whilst none of the options presented are predicted to result in a significant effect, their relative merits can be discussed. The approach set out in Option Three is the least likely to support the vitality and viability of Wood Street's town centre. This is as a result of its focus only on the provision of employment uses, which will not provide housing growth that could support the town centres retail and wider offerings. Meanwhile, mixed use development (Option One) may provide support to the town centre through housing growth. In particular, the pursuit of a fully residential conversion of the Ardsleigh Works through Option Three would offer strong support the town centres retail and wider offerings.	2	3	★ 1
22. Improve the local economy by attracting inward investment	No significant effects are predicted for any of the options put forward. Their relative merits can, however, be discussed. The residential focus of Option Three would lead to a loss of employment space, which in turn may create a less attractive location for investment. However, the provision of a high quantum of residential units here might help to support growth and investment in the town centre. Given the sites current use, Option Two should have no effect on inward investment levels, but could represent a missed opportunity to boost housing levels and so support growth elsewhere in the plan area. Overall, Option One is considered to be the preferred approach as it looks to provide opportunities for investment in business on the site whilst also allowing for housing growth that may help to support Wood Street town centre.	★ 1	2	3
23. Maintain stable levels of employment in the Borough	The Ardsleigh Works site currently has an employment function. Given this, the loss of local employment that would result from the conversion of the site fully into residential use (Option Three) could result in significant negative effects against the baseline. The remaining options would not lead to any loss of employment capacity. This includes Option One , which looks to protect the employment opportunities offered by the site despite the inclusion of residential units. It aims to achieve this through a process of intensification which will result in at least the same number of jobs being provided on the site. Option Two represents a continuation of the current use of the site and so should also not result in any loss of employment capacity, although it would not bring additional housing to the area and the corresponding positive economic effects that could follow.	★ 1	2	3

Summary

Of the alternative options that have been put forward, the approach outlined by **Option One** is considered to be the strongest across all SA objectives. The mixed use approach it calls for should help to reduce crime through natural surveillance, encourage sustainable transport use through a combination of residential and commercial units, support the town centre through housing growth, and tackle deprivation by securing local employment space.

Whilst **Option Three** could result in **significant positive effects** in terms of meeting local housing need and could provide benefits to Wood Street town centre, the

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	<u>Rank of preference</u>		
		Alt 1	Alt 2	Alt 3
	loss of local employment space this would trigger may lead to significant negative effects in relation to employment and associated deprivation. Finally, Option Two's suggested employment use of the site would offer little change from the status quo, and so could represent a missed opportunity to bring housing growth to the area (with associated economic benefits) and would not improve levels of natural surveillance.			

APPENDIX XV: ALTERNATIVES APPRAISAL (STERLING HOUSE)

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 the 'Sterling House' site:

1. Mixed use scheme with residential on the upper storeys and an active use such as social infrastructure or commercial use on the ground floor
2. Residential
3. Office employment
4. Refurbishment of existing building

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 Preferred Options Consultation Document.

Methodology

For each of the alternatives, the appraisal identifies and evaluates 'likely significant effects' on the baseline / likely future baseline, drawing on the sustainability issues 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.⁶⁰

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.⁶¹ 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.

⁶⁰ As stated by Government Guidance (The Plan Making Manual, see <http://www.pas.gov.uk/pas/core/page.do?pagelid=156210>):

"Ultimately, the significance of an effect is a matter of judgment and should require no more than a clear and reasonable justification."

⁶¹ Environmental Assessment of Plans and Programmes Regulations 2004

Appraisal findings

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference			
		Alt 1	Alt 2	Alt 3	Alt 4
1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	Although there are no significant effects predicted for any of the proposed alternative options, their relative merits can be discussed. Options One and Two would both result in the provision of new residential accommodation (of between 10-20 units) in the area; therefore although both options would contribute to this objective. However Option Two would lead to a greater number of new houses coming forward (up to 20 units) than Option One (which would be expected to result in the creation of 10 units); therefore it performs more favourably in terms of this objective. Options Three and Four would not result in the creation of new housing therefore they make no contribution to this objective.	2		-	-
2. Reduce crime and the fear of crime	Whilst none of the options presented are predicted to result in any significant effects, their relative merits can be discussed. The Sterling House site is an area of deprivation in terms of crime. The redevelopment approaches proposed by Options One, Two and Three would require new parking to be provided in accordance with the Council's parking standards, and would seek to create a more active site frontage which should help to contribute to this objective . By creating a mix of uses on the site, the mixed-use approach of Option One is most likely to ensure greater levels of activity and surveillance on and around the site throughout the day and therefore offers the greatest potential for reducing crime and the fear of crime in the area . In contrast, the refurbishment approach of Option Four would not be expected to result in any significant improvements to the quality of the spaces surrounding the development, therefore the large area of car parking surrounding the site would be expected to remain which is unlikely to have any positive effects in terms of reducing crime and the fear of crime.		2	2	3
3. Improve standard of health and wellbeing of those who live and work in the Borough	No implications.	-	-	-	-
4. Increase the provision of and access	Although there are no significant effects predicted for any of the proposed options, their relative merits can be discussed. The approach set out in Option One would result in the creation of a new ground floor use, comprising of either social infrastructure or commercial use, both of which would help contribute to increasing the provision of		-	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference			
		Alt 1	Alt 2	Alt 3	Alt 4
to community facilities to meet local cultural, recreational and social needs	access to community facilities. The other approaches would make no contribution in terms of the objective.				
5. Improve educational attainment in schools	No implications.	-	-	-	-
6. Improve opportunities for access to education and training for all residents	No implications.	-	-	-	-
7. Reduce the overall level of deprivation	<p>There are no significant effects predicted for any of the options, as the site is not located in an area of high employment or health deprivation, however the relative merits of the options can be discussed in general terms. Sterling House is currently in private ownership and is used as an office. A large area within the site is used for car parking which, particularly given its prominent location, does not allow for an efficient use of the site. Options One and Two seek to change the use of the site to either (1) a mixed use residential-led development including social infrastructure or a commercial use on the ground floor or (2) a residential development. While the mixed-use approach of Option One has the potential to maintain a small number of employment opportunities on the site, Option Two would result in a complete loss of employment generating uses.</p> <p>The approach set out in Option Three may enable an intensification of employment uses on site, however there is existing designated employment land located in close proximity to the site, and there is only limited demand within the Wood Street AAP boundary for additional office use. Therefore Option Three could potentially result in redundant provision of additional office space which would not help contribute to this objective.</p>	★ 1	2	3	4

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference			
		Alt 1	Alt 2	Alt 3	Alt 4
	<p>Finally, the approach set out by Option Four would seek refurbishment of the existing building which offers little change from the status quo and is therefore unlikely to have any implications in terms of this objective.</p> <p>Overall the balanced, mixed use approach of Option One is expected to have the most positive effects in terms of this objective.</p>				
8. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system	<p>No significant effects are predicted for any of the options put forward; however their relative merits can be discussed. Sterling House is located in an area of low public transport accessibility, which is reflected in its PTAL 2 rating. However a bus stop is located in close proximity to the site (22m away), therefore all four alternative options are expected to provide opportunities for some access to services through sustainable transport. However Options One and Two would also seek public realm improvements to enhance pedestrian and cycle access, which should further help to enhance opportunities for access through sustainable modes of transport. In addition, by pursuing a mixed-development approach, Option One may help to reduce the need to travel for services, so potentially relieving pressure on the transport system. As such, it is considered to be the preferred alternative for this SA objective.</p> <p>The refurbishment approach proposed by Option Four is not expected to make any additional contributions to this objective.</p>	★ 1	2	3	4
9. Reduce production of waste and increase recycling	No implications.	-	-	-	-
10. Reduce greenhouse gas emissions	<p>Whilst none of the options presented are predicted to result in a significant effect, their relative merits can be discussed. Sterling House is located in an area of low public transport accessibility, which is reflected in its PTAL 2 rating. However, a bus stop is located within close proximity to the site (22m away). As such, there should be opportunities for at least some access to services through sustainable transport as a result of the approaches set out by the alternatives. Options One, Two and Three would result in the complete redevelopment of the site which would seek to reduce the extent of car parking currently on the site; a reduction in car parking provision should help to limit car use and associated greenhouse gas emissions. In addition, the level of residential development proposed by Options One and Two takes into account the London Plan Density Matrix's suggested appropriate density for the area's PTAL level, which should also help to prevent increased greenhouse gas emissions as a result of</p>	★ 1	2	3	4

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference			
		Alt 1	Alt 2	Alt 3	Alt 4
	<p>car use.</p> <p>However, by pursuing a mixed-development approach, Option One may help to reduce the need to travel for services, so potentially relieving pressure on the transport system. As such, it is considered to be the preferred alternative for this SA objective.</p>				
11. Conserve energy	No implications.	-	-	-	-
12. Improve air quality through a reduction in traffic-based emissions	<p>Whilst none of the options presented are predicted to result in a significant effect, their relative merits can be discussed. Sterling House is located within an Air Quality Management Area (AQMA) and has low public transport accessibility, which is reflected in its PTAL 2 rating. However a bus stop is located in close proximity to the site (22m away). As such, there should be opportunities for at least some access to services through sustainable transport, which will potentially limit car use and associated emissions. The approaches set out in options One, Two and Three would also be expected to reduce the extent of car parking currently on the site; a reduction in car parking provision should help to limit car use and associated greenhouse gas emissions.</p> <p>In addition, the level of residential development proposed by Options One and Two takes into account the London Plan Density Matrix's suggested appropriate density which is linked to the area's PTAL level. This should help to prevent increased emissions as a result of car use. Options One and Two also seek public realm improvements to enhance pedestrian and cycle access to the site which should encourage travel to and from the site via walking and cycling which could make some contribution to this objective.</p>	★ 1	★ 1	2	3
13. Improve water quality and ensure the efficient use of water resources	No implications.	-	-	-	-
14. Reduce the risk of	Wood Street is situated in Flood Zone 1 and has a low risk of flooding. As such, no significant effects are predicted in relation to this SA objective.	-	-	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference			
		Alt 1	Alt 2	Alt 3	Alt 4
flooding					
15. Reduce contamination and safeguard soil quality and quantity	No implications.	-	-	-	-
16. Make the best use of previously developed land (PDL) and existing buildings	<p>The approaches set out by Options One and Two seek to make better use of the site than the current site use and layout by intensifying the uses and reducing the amount of car parking. Both approaches are therefore considered likely to result in significant positive effects in terms of this objective.</p> <p>Given that office use is not considered to be the most suitable use for the site, and in light of there already being designated employment land in close proximity that benefits from better accessibility, Option Three is not predicted to make a positive contribution to this objective.</p> <p>While Option Four would seek the refurbishment, and hence re-use, of the building, the current building layout does not make optimal use of the site therefore this approach is not considered to have any positive effects in terms of this objective.</p>	★ 1	★ 1	2	2
17. Conserve and enhance biodiversity	No implications.	-	-	-	-
18. Protect the ecological integrity of Natura 2000 sites	No implications.	-	-	-	-
19. Maintain and enhance the quality of the green belt and open space areas.	No implications.	-	-	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference			
		Alt 1	Alt 2	Alt 3	Alt 4
20. Conserve and, where appropriate, enhance the historic environment	No implications.	-	-	-	-
21. Maintain and enhance the vitality and viability of the Borough's town centres	No implications.	-	-	-	-
22. Improve the local economy by attracting inward investment	<p>Whilst none of the options presented are predicted to result in a significant effect, their relative merits can be discussed. Options One, Two and Three propose comprehensive re-development of the site which should lead to an improvement in the condition and appearance of the site, as well as bring about improvements to the public realm, which is predicted to help attract inward investment.</p> <p>Option Four is expected to make little, if any, contribution to this objective as refurbishment of the existing building would not be expected to result in the enhancement of the spaces surrounding the existing building.</p>	★ 1	★ 1	★ 1	2
23. Maintain stable levels of employment in the Borough	<p>Whilst none of the options presented are predicted to result in any significant effects, their relative merits can be discussed. Although the approaches set out in Options One and Two would result in the loss of employment generating uses on site they would result in an increase in local housing provision which would help to support local businesses and the Wood Street town centre.</p> <p>The approach set out in Option Three would result in the intensification of employment uses on site; while this approach would ensure that there was no employment losses on site, it is considered that the designated Borough employment land in close proximity to the site should be the focus for providing for and intensifying the job offer within the Wood Street AAP area. As such this approach is predicted to have some potentially negative effects by not supporting the consolidation and growth of the town centre.</p> <p>The approach set out by Option Four would seek the refurbishment of the existing building offers little change from the status quo, therefore it not expected to bring about any significant positive changes in terms of the design and layout of</p>	★ 1	2	3	4

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	<u>Rank of preference</u>			
		Alt 1	Alt 2	Alt 3	Alt 4
	the site thus it is not expected to have any significant implications on this objective.				
<p>Summary</p> <p>Overall, in terms of the sustainability objectives there is <u>little to distinguish</u> between Options One and Two. Both approaches are expected to have positive effects in terms of a number of the objectives, particularly through increasing local housing supply and thus addressing local housing need (with Option Two performing slightly better than Option One by offering the potential for a higher amount of new housing); reducing crime and the fear of crime (by activating the site's frontage and increasing levels of activity on the site); and reducing greenhouse gas emissions (by limiting car parking and hence reducing car use). Options One and Two are also expected to make better use of the site (by intensifying uses and reducing car parking on site) thus having significant positive effects in terms of the objective. It is notable however that Option One would increase provision of and access to community facilities to meet local cultural, recreational and social needs.</p> <p>Neither Option Three nor Option Four is predicted to have any significant effects in terms of the objectives as both offers little change from the status quo, however Option Three is expected to have some positive contributions in terms reducing crime, reducing greenhouse gas emissions and attracting inward investment.</p>					

APPENDIX XVI: ALTERNATIVES APPRAISAL (WILLOW HOUSE)

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 the 'Willow House' site:

1. Redevelopment of site with new building comprising residential on upper storeys with active use (e.g. social infrastructure or commercial) on ground floor
2. Office
3. Refurbishment of existing building

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 Preferred Options Consultation Document.

Methodology

For each of the alternatives, the appraisal identifies and evaluates 'likely significant effects' on the baseline / likely future baseline, drawing on the sustainability issues 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.⁶²

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.⁶³ 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.

⁶² As stated by Government Guidance (The Plan Making Manual, see <http://www.pas.gov.uk/pas/core/page.do?pagelid=156210>):

"Ultimately, the significance of an effect is a matter of judgment and should require no more than a clear and reasonable justification."

⁶³ Environmental Assessment of Plans and Programmes Regulations 2004

Appraisal findings

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	There are no significant effects predicted for any of the proposed options, however their relative merits can be discussed. Of the three alternative options presented, only Option One would contribute to this objective by providing new residential accommodation comprising of up to 50 units.	★ 1	-	-
2. Reduce crime and the fear of crime	<p>Whilst none of the options presented are predicted to result in any significant effects, their relative merits can be discussed. Options One and Two would result in the complete redevelopment of the site. Both approaches would be required to ensure that they would create an active frontage which should help contribute to this objective. Option One would result in the creation of an active use at ground floor level which has the potential to make a greater contribution to this objective than Option Two. In addition, the Council would seek for large areas of impermeable surfaces to be avoided as part of the redevelopment approaches set out in Options One and Two which would help to minimise the amount of land on the site used for car parking; which in turn increases the likelihood that the majority of the site will comprise of active uses.</p> <p>In contrast, the refurbishment approach of Option Three would not be expected to result in any significant improvements to the street frontage or the quality of the spaces surrounding the development, therefore the large area of car parking on the northern part of the site would be expected to remain which would not have a positive effect in terms of this objective.</p>	★ 1	2	3
3. Improve standard of health and wellbeing of those who live and work in the Borough	No implications.	-	-	-
4. Increase the provision of and access to	Although there are no significant effects predicted for any of the proposed alternatives, their relative merits can be discussed. The approach set out in Option One would result in the creation of a new ground floor use, comprising of either social infrastructure or a commercial use, which is expected to help contribute to increasing the provision of access to	★ 1	2	2

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
community facilities to meet local cultural, recreational and social needs	community facilities in the area. Given that the approaches set out in Options Two and Three would not provide any additional community facilities, neither is expected to make a contribution to this objective.			
5. Improve educational attainment in schools	No implications.	-	-	-
6. Improve opportunities for access to education and training for all residents	No implications.	-	-	-
7. Reduce the overall level of deprivation	<p>There are no significant effects predicted for any of the options, as the site is not located in an area of high deprivation, however the relative merits of the alternatives can be discussed in general terms. Willow House is owned by the Council and is currently used as an office. The majority of the site is currently used for car parking which, particularly given its prominent location, does not allow for an efficient use of the site. The mixed-use approach of Option One seeks to change the use of the site to use a residential-led development including social infrastructure or a commercial use on the ground floor. As such, although Option One would be expected to result in a significant loss of employment generating jobs on site, it would also be expected to create some new employment opportunities through the provision of new social infrastructure or commercial use on the ground floor.</p> <p>Option Two seeks to redevelop the site while maintaining the current office use. This approach would be expected to result in an intensification of the site which should lead to the creation of additional office space and a potential increase in local job opportunities. However as there is already designated Borough employment land in close proximity to the site that benefits from better accessibility, and given there is only limited demand for additional office use in the Wood Street AAP area, this</p>	★ 1	2	3

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
	approach could potentially result in the redundant provision of office space which would not help contribute to this objective. The approach set out by Option Three would seek refurbishment of the existing building and offers little change from the status quo as such it is unlikely to have any significant effects in terms of this objective.			
8. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system	<p>No significant effects are predicted for any of the options put forward; however their relative merits can be discussed. Willow House is located in an area of relatively low public transport accessibility, which is reflected in its PTAL 3 rating. However a bus stop is located on the edge of the site, therefore all three options are expected to provide opportunities for some access to services through sustainable transport.</p> <p>Options One and Two would seek to improve the urban form and character of the area, and intensify the uses on the site which may result in an increased demand for greater public transport provision in the area. In addition, by pursuing a mixed-development approach, Option One may help to reduce the need to travel for services, so potentially relieving pressure on the transport system. As such, it is considered to be the preferred alternative for this SA objective.</p> <p>The refurbishment approach proposed by Option Three offers little change from the status quo and is therefore not expected to make any additional contributions to this objective.</p>	★ 1	2	3
9. Reduce production of waste and increase recycling	No implications.	-	-	-
10. Reduce greenhouse gas emissions	Whilst none of the options presented are predicted to result in a significant effect, their relative merits can be discussed. Willow House is located in an area of relatively low public transport accessibility, which is reflected in its PTAL 3 rating. However, a bus stop is located on the edge of the site. As such, there should be opportunities for at least some access to services through sustainable transport as a result of the approaches set out by the alternatives. Options One and Two would result in the complete redevelopment of the site which would seek to reduce the extent of surface car parking currently on the site; a reduction in car parking provision should help to limit car use and associated greenhouse gas emissions. In addition, the level of residential development proposed by Option One takes into account the London Plan Density Matrix's suggested appropriate density for the area's PTAL level, which should also help to prevent increased greenhouse gas emissions as a result of car use. By pursuing a mixed-development approach, Option One may also help to reduce the	★ 1	2	3

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
	<p>need to travel for services, so potentially relieving pressure on the transport system. As such, it is considered to be the preferred alternative for this SA objective.</p> <p>The approach set out by Option Three would seek refurbishment of the existing building and offers little change from the status quo in that it would not seek a reduction in car parking space; as such it is unlikely to have any significant effects in terms of this objective.</p>			
11. Conserve energy	No implications.	-	-	-
12. Improve air quality through a reduction in traffic-based emissions	<p>Whilst none of the options presented are predicted to result in a significant effect, their relative merits can be discussed. Willow House is located in an area of relatively low public transport accessibility, which is reflected in its PTAL 3 rating. However, a bus stop is located on the edge of the site. As such, there should be opportunities for at least some access to services through sustainable transport as a result of the approaches set out by the options. Options One and Two would result in the complete redevelopment of the site which would seek to reduce the extent of surface car parking currently on the site; a reduction in car parking provision should help to limit car use and associated greenhouse gas emissions. In addition, the level of residential development proposed by Option One takes into account the London Plan Density Matrix's suggested appropriate density for the area's PTAL level, which should help to prevent increased emissions as a result of car use. By pursuing a mixed-development approach, Option One may also help to reduce the need to travel for services, so potentially relieving pressure on the transport system. As such, it is considered to be the preferred alternative for this SA objective.</p> <p>The approach set out by Option Three would seek refurbishment of the existing building and offers little change from the status quo in that it would not seek a reduction in car parking space; as such it is unlikely to have any significant effects in terms of this objective.</p>	★ 1	2	3
13. Improve water quality and ensure the efficient use of water resources	No implications.	-	-	-
14. Reduce the risk of	Wood Street is situated in Flood Zone 1 and has a low risk of flooding. As such, no significant effects are predicted in relation to this SA objective.	-	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
flooding				
15. Reduce contamination and safeguard soil quality and quantity	No implications.	-	-	-
16. Make the best use of previously developed land (PDL) and existing buildings	<p>The approaches set out by Options One and Two seek to make better use of the site than that offered by the current site layout by intensifying the uses on the site and reducing the amount of surface car parking. The mixed-use approach set out in Option One is expected to result in significant positive effects in terms of this objective. Given that office use is not considered to be the most suitable use for the site, particularly in light of there already being designated employment land in close proximity that benefits from better accessibility, Option Two is not predicted to make a positive contribution to this objective as the approach could result in the redundant provision of office use.</p> <p>While Option Three would seek the refurbishment, and hence re-use, of the existing building, the current layout does not make optimal use of the site, and approach would not seek a reduction in car parking; therefore this approach would not be expected to make a positive contribution to this objective.</p>	★ 1	2	3
17. Conserve and enhance biodiversity	No implications.	-	-	-
18. Protect the ecological integrity of Natura 2000 sites	No implications.	-	-	-
19. Maintain and enhance the quality of the green belt and open space areas.	No implications.	-	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
20. Conserve and, where appropriate, enhance the historic environment	<p>Although the site is not located in a conservation area, nor is there any listed buildings within the site, the Wood Street library, which is a locally listed building, is located to the south of the site on the other side of Forest Road. Options One and Two would result in complete redevelopment of the site and as such both are predicted to have a greater effect on this objective than Option Three, which seeks only to refurbish the existing building and offers little change from the status quo.</p> <p>The redevelopment options set out in Options One and Two would be required to meet the principles of the Design and Place-making policies, as well as be of the highest design quality in order to minimise the impact on the setting of the Wood Street library. As such, the approaches set out in Options One and Two are expected to facilitate the creation of a new gateway development that should enhance the appearance of the surrounding area, thus making a positive contribution to this objective.</p>	★ 1	★ 1	2
21. Maintain and enhance the vitality and viability of the Borough's town centres	No implications.	-	-	-
22. Improve the local economy by attracting inward investment	<p>Whilst none of the options presented are predicted to result in a significant effect, their relative merits can be discussed. The site is located in a prominent location at the junction of Forest Road and Fulbourne Road. Options One and Two propose comprehensive re-development of the site and both development approaches would be required to activate the frontages onto Forest Road and Fulbourne Road, to create a new gateway development. Options One and Two are therefore predicted to lead to an improvement in the condition and appearance of this prominent site, which would have positive effects on the surrounding area. However given that there is existing designated employment land in close proximity that benefits from better accessibility to the site, it is possible that Option Two could result in the creation of redundant office space, which would not make a positive contribution in terms of this objective.</p> <p>Option Three is expected to make the least contribution to this objective as the refurbishment of the existing building would not be expected to result in any significant enhancement to the site's frontages.</p>	★ 1	2	3
23. Maintain stable levels of employment in the Borough	There are no significant effects predicted for any of the options, however their relative merits can be discussed. Although the site is currently used as Council offices, the Council has identified the site as not being the most suitable for large scale office use due to it not being easily accessible by public transport, and in light of their being alternative locations that are designated borough employment land that are closer to the train station.	★ 1	2	3

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
	<p>Option One would result in a mixed use, residential-led development that would result in an overall loss of employment space on site, but would also lead to the creation of a small number of new job opportunities through the new ground floor use. Furthermore, the loss of office employment space should not have a serious impact on employment levels given that there are alternative employment land options in close proximity to the site which the Council would be expected to relocate their Housing offices to.</p> <p>Option Two would seek redevelopment of the site with the intensification of office use. Although this would provide an increase in employment space it is possible that this option could result in the creation of redundant office space, which would not have a positive effect on this objective.</p> <p>The approach set out by Option Three proposes the refurbishment of the existing building which offers little change from the status quo.</p>			

Summary

Of the three approaches, **Option One** is clearly the strongest performing in terms of the SA objectives. In particular, **Option One** would help address local housing need (through the provision of up to 50 new housing units), is expected to make better use of the land than the other two options (through intensifying / diversifying uses on the site and reducing the amount of surface car parking) and has the greatest potential to improve the local economy by attracting inward investment (through improving the condition and appearance of the site).

While **Option Two** is predicted to have some **positive effects** in terms of the SA objectives this is likely to be to a much lesser extent than **Option One**. The approach set out by **Option Two** should help to improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system (through improving the urban form and character of the area and intensifying the uses on the site which may result in an increased demand for greater public transport provision in the area) and should help to enhance the historic environment (through creating a new gateway development that will enhance the appearance of the site and the surrounding area).

Overall, the approach set out by **Option Three** offers little change to the status quo and is therefore not predicted to have any significant effects in terms of the baseline.

APPENDIX XVII: ALTERNATIVES APPRAISAL (WOOD STREET CORNER)

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 the 'Wood Street Corner' site:

1. Residential development, possibly with an active ground floor use
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 Preferred Options Consultation Document.

Methodology

For each of the alternatives, the appraisal identifies and evaluates 'likely significant effects' on the baseline / likely future baseline, drawing on the sustainability issues 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.⁶⁴

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.⁶⁵ 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.

⁶⁴ As stated by Government Guidance (The Plan Making Manual, see <http://www.pas.gov.uk/pas/core/page.do?pagelid=156210>):

"Ultimately, the significance of an effect is a matter of judgment and should require no more than a clear and reasonable justification."

⁶⁵ Environmental Assessment of Plans and Programmes Regulations 2004

Appraisal findings

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	While there are no significant effects predicted for either of the options their relative merits can be discussed. The Wood Street Corner site is considered as being in an area of housing deprivation. Of the two options presented the approach set out in Option One is most likely to help in meeting local housing need as it seeks to provide between 10 and 25 residential units as part of a residential scheme, with the possibility of incorporating an active ground floor use. In contrast, a retail scheme on site, as set out in Option Two , would not contribute to an increase in local housing provision so would not help to address identified housing need in the Wood Street AAP area.	★ 1	2
2. Reduce crime and the fear of crime	While neither of the options presented are predicted to result in any significant effects, their relative merits can be discussed. Office buildings are located on the site however these are unoccupied and have been for some time. The redevelopment approaches presented by both options would result in the site being brought back into use which would help to increase activity in the area. Both options would also result in the creation of an active frontage on Forest Road which would improve natural surveillance in the area; as such both options are predicted to have some positive effects in terms of reducing crime and the fear of crime in the area. However the approach set out in Option One , which proposes residential use, potentially coupled with an active ground floor use, is predicted to have slightly more positive effects in terms of this objective than Option Two as the uses are expected to generate activity on the site throughout the day; whereas Option Two is predicted to generate activity on and around the site during business hours only.	★ 1	2
3. Improve standard of health and wellbeing of those who live and work in the Borough	No implications.	-	-
4. Increase the provision of and access to	There are no significant effects predicted for either of the options however their relative merits can be discussed. The site currently comprises of a car park and vacant office buildings. Depending on what ground floor use is taken forward as part of Option One (i.e. should community/social infrastructure be incorporated within this approach), this option could potentially have a positive	?	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
community facilities to meet local cultural, recreational and social needs	effect on this objective through increasing the provision and access to community facilities in the area. However without knowing what this ancillary use would comprise of, it is not possible to predict its effects. The retail approach proposed in Option Two would not have any implications on this objective.		
5. Improve educational attainment in schools	No implications.	-	-
6. Improve opportunities for access to education and training for all residents	No implications.	-	-
7. Reduce the overall level of deprivation	There are no significant effects predicted for either of the options however their relative merits can be discussed. The development of the site to residential uses, potentially coupled with an ancillary active use on the ground floor, as proposed through Option One , is likely to result in the creation of new homes, which may potentially support local economic development and job creation, thus helping to tackle deprivation. Option Two's approach to developing the site with a retail use should also contribute towards job creation. Both options should bring the site back into use and are therefore predicted to result in positive effects in terms of reducing deprivation in the area.	★ 1	★ 1
8. Improve opportunities for access to local services, facilities and	No implications.	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
employment through an integrated sustainable transport system			
9. Reduce production of waste and increase recycling	No implications.	-	-
10. Reduce greenhouse gas emissions	No implications.	-	-
11. Conserve energy	No implications.	-	-
12. Improve air quality through a reduction in traffic-based emissions	No implications.	-	-
13. Improve water quality and ensure the efficient use of water resources	No implications.	-	-
14. Reduce the risk of flooding	Wood Street is situated in Flood Zone 1 and has a low risk of flooding. As such, no significant effects are predicted in relation to	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
	this SA objective.		
15. Reduce contamination and safeguard soil quality and quantity	No implications.	-	-
16. Make the best use of previously developed land (PDL) and existing buildings	<p>The site, which is situated at the junction of Forest Road and Wood Street, is in a prominent gateway location. The site is currently underutilised with car parking dominating the front of the site, and poor quality unoccupied Council offices located on the western and rear side of the site. Both options proposed would involve the demolition of the existing buildings and their replacement with new development which should bring the site back into use.</p> <p>However Option Two would redevelop the site to retail uses which could have a detrimental effect on the town centre of Wood Street by working against the Council's attempts to consolidate retail uses in the town centre; thus having potentially having negative effects on the wider Wood Street economy. As such, the residential approach set out in Option One is considered to be the preferable option overall and is predicted to have significant positive effects on this objective by intensifying, and making better use of this prominent brownfield site.</p>	★ 1	2
17. Conserve and enhance biodiversity	No implications.	-	-
18. Protect the ecological integrity of Natura 2000 sites	No implications.	-	-
19. Maintain and enhance the quality of the green belt and open	No implications.	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
space areas.			
20. Conserve and, where appropriate, enhance the historic environment	<p>The Wood Street Corner site is located adjacent to the Wood Street library, a prominent locally listed building. The front half of the site is dominated by car parking, which prevents the site from having an active frontage. In addition the design and the condition of the existing buildings on the site do not make a positive contribution to the appearance of the library building.</p> <p>Both options would seek the redevelopment and intensification of the site with Option One proposing a residential use (with a possible ancillary active use on the ground floor), and Option Two proposing a retail use. The Council would seek any redevelopment on the site to be of the highest urban design quality and to preserve and respond sensitively to the library building; as such both options are predicted to have a significant positive effect in terms of enhancing Wood Street’s historic environment.</p>	★ 1	★ 1
21. Maintain and enhance the vitality and viability of the Borough’s town centres	<p>The residential approach, with the possibility of an ancillary active use on the ground floor, proposed by Option One will provide housing growth which may help to support the vitality and viability of the Wood Street town centre.</p> <p>Option Two’s redevelopment of the site to entirely retail uses may undermine the town centre of Wood Street by working against the Council’s attempts to consolidate retail uses in the town centre, thus reducing its vitality and viability. Option Two is consequently predicted to result in significant negative effects against the baseline.</p>	★ 1	2
22. Improve the local economy by attracting inward investment	<p>No significant effects are predicted for either of the proposed alternative options; however their relative merits can be discussed. Option One seeks to provide residential development which should support the town centre and in doing so the wider investment potential of the Wood Street area. Option Two is considered less likely to bring about improvements to the local economy through increased inward investment as retail uses at this location could potentially undermine the town centre of Wood Street by working against the Council’s attempts to consolidate retail uses in the town centre. Decline in the vitality and viability of the town centre could potentially make the Wood Street area less attractive to inward investment.</p>	★ 1	2
23. Maintain stable levels of employment in the Borough	<p>No significant effects are predicted for either of the alternative options; however their relative merits can be discussed. The Wood Street Corner site, which currently comprises of empty Council offices, is located within an area considered to suffer from a high level of employment deprivation. It is not clear whether the approach set out by Option One would lead to an increase in employment on the site as it is dependent on the type of use that comes forward on the ground floor (i.e. whether or not it would be employment generating). However regardless of whether Option One would involve 100% residential use, or residential use with an ancillary active use on the ground floor, both approaches would result in an increase in housing provision on site which would help to support local businesses and the Wood Street town centre.</p>	★ 1	2

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
	By contrast, while Option Two would redevelop the site to retail uses, and thus help to increase local employment through employment generation on site, this approach could have a detrimental effect on the town centre of Wood Street by working against the Council's attempts to consolidate retail uses in the town centre; thus having potentially negative effects on the wider Wood Street economy. Consequently Option One is considered to be the <u>preferable option</u> overall in terms of this objective.		
<p>Summary</p> <p>The approach set out by Option One is considered to be the <u>preferable option</u> as it performs better against the SA objectives overall. In particular it should help to address local housing need (through increasing local housing provision through the creation of 10-25 housing units), provide housing growth which may help to support the vitality and viability of the Wood Street town centre, and make better use of a prominent brownfield site (through bringing the site back into use with residential development).</p> <p>Both options are also expected to enhance Wood Street's historic environment through bringing the site back into use, replacing the existing poor quality buildings on site with higher quality development and creating an active frontage that should complement Wood Street library. They are also expected to help to reduce deprivation in the area by supporting local economic development and job creation.</p>			

APPENDIX XVIII: ALTERNATIVES APPRAISAL (MARLOWE ROAD ESTATE)

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 the 'Marlowe Road Estate' site:

1. Comprehensive redevelopment of the Marlowe Road Estate with 100% residential with mix of private and affordable housing.
2. Refurbishment
3. Residential but with higher number of flats and higher density

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 Preferred Options Consultation Document.

Methodology

For each of the alternatives, the appraisal identifies and evaluates 'likely significant effects' on the baseline / likely future baseline, drawing on the sustainability issues 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.⁶⁶

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.⁶⁷ 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.

⁶⁶ As stated by Government Guidance (The Plan Making Manual, see <http://www.pas.gov.uk/pas/core/page.do?pagelid=156210>):

"Ultimately, the significance of an effect is a matter of judgment and should require no more than a clear and reasonable justification."



⁶⁷ Environmental Assessment of Plans and Programmes Regulations 2004

Appraisal findings

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	The Marlowe Road Estate area is regarded as being in an area of housing deprivation and there is an identified need for increased amounts of family housing in Walthamstow Forest. In addition, the area is in close proximity to Walthamstow Town Centre, public transport connections, and open spaces such as Epping Forest; all of which may prove attractive to families. The comprehensive redevelopment of the Marlowe Road Estate site, as proposed through Option One , should help to meet identified housing need in the area as it includes a focus on providing family homes. This approach includes some additional scope for higher density living, as the eastern area is to incorporate buildings of four to five stories. A mix of private and affordable homes will be provided. It is therefore predicted to result in significant positive effects in terms of meeting local housing needs in a manner which provides a range of dwellings. Option Three meanwhile is less likely to meet the needs of those seeking family homes in the area due to its focus on higher density, flat-led development, although it may present an opportunity to change the mix of the area in terms of community. The approach outlined in Option Two , with its focus on the refurbishment of the existing housing stock on the site, is also unlikely to meet the local identified need for family housing due to the current density of the site. It will also fail to result in the creation of a more mixed community.	★ 1	3	2
2. Reduce crime and the fear of crime	The current layout of the Marlowe Road Estate is considered to result in a sense of isolation at ground level and lack of surveillance that may contribute to crime levels in the area (which is considered to be highly deprived in terms of levels of crime). Whilst the refurbishment of the site through Option Two may present some opportunities to improve this situation, a complete redevelopment of the site, as proposed through Options One and Three is more likely to lead to improvements (for instance by incorporating ‘secured by design’ principles from the outset). As a result, these alternatives are predicted to lead to significant positive effects in terms of this SA objective	★ 1	2	★ 1
3. Improve standard of health and wellbeing of those who live and work in the Borough	No implications.	-	-	-
4. Increase the provision of and access to	No implications.	-	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
community facilities to meet local cultural, recreational and social needs				
5. Improve educational attainment in schools	No implications.	-	-	-
6. Improve opportunities for access to education and training for all residents	No implications.	-	-	-
7. Reduce the overall level of deprivation	<p>Whilst no significant effects are anticipated for any of the options put forward, their relative merits can be discussed. Development in the Marlowe Road Estate and Plaza cluster is proposed to lead to a 'new heart for the District Centre'. The redevelopment of the Marlowe Road Estate site through Option Two is most likely to support the Wood Street Town Centre in this respect, as higher densities (than Option One) may result in increased footfall and economic activity in the area, with associated reductions in deprivation. In addition, both Option One and Two are likely to lead to public realm improvements (such as secure by the design features and increased legibility) and a more diverse social mix. Given the proximity of the Marlowe Road Estate site to the centre of Wood Street, such alterations may further support economic activity in the area. Meanwhile, whilst Option Two features a high density, and refurbishment could result in some public realm improvements, this approach is less likely to bring about wholesale positive changes in the design and layout of the area and will not create a more diverse community. As a result, it is predicted that this approach will have a lesser impact on addressing the determinants of deprivation.</p>	1	3	★ 1

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
8. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system	The central location of the Marlowe Road Estate presents an excellent opportunity to create housing that is well connected to local transport links, such as the rail station, and which is in close proximity to shops and services in the Wood Street town centre (so reducing the need to travel). Given the potential of this site to provide opportunities to access to services by sustainable transport means (including walking and cycling), a higher density approach in conjunction with public realm improvements, such as that outlined in Alternative Three is likely to result in significant positive effects in terms of this SA objective. Although offering a lower quantum development, Alternative One is also likely to result in positive effects as a result of public realm improvements, such as increased permeability, which may help to increase walking and cycling. Meanwhile, the refurbishment led approach of Alternative Two may not offer similar levels of scope to improve the public realm to the benefit of those wishing to travel by more sustainable means.	2	3	1
9. Reduce production of waste and increase recycling	Although no significant effects are predicted for any of the options put forward, their relative merits can be discussed. Both Options One and Three offer the chance to plan for future change by designing in measures to improve resource efficiency. As a result, they are considered to be preferable to Option Three , which offers relatively limited scope for change through refurbishment.	1	2	1
10. Reduce greenhouse gas emissions	The central location of the Marlowe Road Estate presents an excellent opportunity to create housing that is well connected to local transport links, such as the rail station, and which is in close proximity to shops and services in the Wood Street town centre (so reducing the need to travel). The high density of housing and public realm improvements proposed through Option Three would likely lead to high level uptake of sustainable transport and reduced travel overall. In addition, a high density approach is likely to provide optimum conditions for the incorporation of a CHP system into the new development, whilst new development offers the chance to improve energy efficiency. As such, this alternative is predicted to result in significant positive effects in terms of this SA objective. Option One meanwhile is likely to achieve lesser benefits, primarily due to its lower density which will fail to take maximum advantage of the opportunities present on the site. Finally, Option Two's refurbishment led approach is less likely to lead to whole scale improvements in terms of energy efficiency and may present a challenge in terms of fitting a CHP system. However, it should be noted that much can be achieved through retrofitting for greenhouse gas emissions and that the preservation of the buildings would save the embodied carbon involved in their construction.	2	2	1

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
11. Conserve energy	An energy study on heat demand in the Borough has indicated that there is an opportunity for the establishment of a decentralised energy network in the Wood Street area. Such systems function best where high density development is in place, and so the higher quantum of development proposed through Option Three may support the viability of any future CHP system, with associated energy efficiency gains. In addition, the redevelopment led approach of this alternative should help to ensure that opportunities are taken to improve the energy efficiency of housing. As a result, Option Three is predicted to lead to significant positive effects in terms of this SA objective. Meanwhile, Option One may help to improve energy efficiency through redevelopment, but its lower density means that a CHP would be less viable or would reach less homes. Finally, Option Two's refurbishment led approach is less likely to lead to whole scale improvements in terms of energy efficiency and may present a challenge in terms of fitting a CHP system.	2	3	1 
12. Improve air quality through a reduction in traffic-based emissions	The central location of the Marlowe Road Estate presents an excellent opportunity to create housing that is well connected to local transport links, such as the rail station, and which is in close proximity to shops and services in the Wood Street town centre (so reducing the need to travel). Given the potential of this site to provide opportunities to access to services by sustainable transport means (including walking and cycling), a higher density approach in conjunction with public realm improvements, such as that outlined in Option Three is likely to result in significant positive effects in terms of reducing traffic-based emissions, particularly given the designation of the plan-area as an AQMA. Although offering a lower quantum development, Option One is also likely to result in positive effects as a result of public realm improvements, such as increased permeability, which may help to increase walking and cycling. Meanwhile, the refurbishment led approach of Option Two may not offer similar levels of scope to improve the public realm to the benefit of those wishing to travel by more sustainable means.	2	3	1 
13. Improve water quality and ensure the efficient use of water resources	No implications.	-	-	-
14. Reduce the risk of flooding	Wood Street is situated in Flood Zone 1 and has a low risk of flooding. As such, no significant effects are predicted in relation to this SA objective.	-	-	-
15. Reduce contamination	No implications.	-	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
and safeguard soil quality and quantity				
16. Make the best use of previously developed land (PDL) and existing buildings	The reuse and refurbishment of the existing Marlowe Road Estate buildings is proposed by Option Two , and as such will result in significant positive effects in terms of this sustainability objective. This is in contrast to Options One and Three , which would result the loss of the existing buildings.	2	★ 1	2
17. Conserve and enhance biodiversity	No implications.	-	-	-
18. Protect the ecological integrity of Natura 2000 sites	No implications.	-	-	-
19. Maintain and enhance the quality of the green belt and open space areas.	No implications.	-	-	-
20. Conserve and, where appropriate, enhance the historic environment	There is a locally listed building on Shernhall Street, on the western part of the Marlowe Road Estate site. The “Lord Brooke” public house is a typical late 19th century Victorian public house in original external condition. This pub will be retained during the course of any development activity on this site and as such no effects on this historic environment are predicted for any of the alternatives put forward.	-	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
21. Maintain and enhance the vitality and viability of the Borough's town centres	Whilst no significant effects are anticipated for any of the alternatives put forward, their relative merits can be discussed. Development in the Marlowe Road Estate and Plaza cluster is proposed to lead to a 'new heart for the District Centre'. The redevelopment of the Marlowe Road Estate site through Option Two is most likely to support the Wood Street Town Centre in this respect, as higher densities (than Option One) may result in increased footfall and economic activity in the area. In addition, both Option One and Two are likely to lead to public realm improvements (such as secure by the design features and increased legibility). Given the proximity of the Marlowe Road Estate site to the centre of Wood Street, such alterations may further support economic activity in the area. Meanwhile, whilst Option Two features a high density, and refurbishment could result in some public realm improvements, this approach is less likely to bring about wholesale positive changes in the design and layout of the area. As a result, it is predicted that this approach will support the town centre to a lesser extent.	2	3	★1
22. Improve the local economy by attracting inward investment	No significant effects are anticipated for any of the options put forward. However, their relative merits can be discussed. Development in the Marlowe Road Estate and Plaza cluster is proposed to lead to a 'new heart for the District Centre'. The redevelopment of the Marlowe Road Estate site through Option Two is most likely to support the Wood Street Town Centre in this respect, as higher densities (than Option One) may result in increased footfall and economic activity in the area, and as a result could help to encourage inward investment. In addition, both Option One and Two are likely to lead to public realm improvements (such as secure by the design features and increased legibility). Given the proximity of the Marlowe Road Estate site to the centre of Wood Street, such alterations may further support economic activity and provide an attractive business environment for investors. Meanwhile, whilst Option Two features a high density, and refurbishment could result in some public realm improvements, this approach is less likely to bring about wholesale positive changes in the design and layout of the area. As a result, it is predicted that this approach will support the town centre to a lesser extent and so is less likely to draw in investment.	2	3	★1
23. Maintain stable levels of employment in the Borough	Although no significant effects are anticipated for any of the options put forward, their relative merits can be discussed. Development in the Marlowe Road Estate and Plaza cluster is proposed to lead to a 'new heart for the District Centre'. The redevelopment of the Marlowe Road Estate site through Option Two is most likely to support the Wood Street Town Centre in this respect, as higher densities (than Option One) may result in increased footfall and economic activity in the area, and as a result could help to support employment. In addition, both Option One and Two are likely to lead to public realm improvements (such as secure by the design features and increased legibility). Given the proximity of the Marlowe Road Estate site to the centre of Wood Street, such alterations may further support economic activity and employment in the area. Meanwhile, whilst Option Two features a high density, and refurbishment could result in some public realm improvements, this approach is less likely to bring about wholesale positive changes in the design and layout of the area. As a result, it is predicted that this approach will support the town centre to a lesser extent and so is less likely to improve employment	2	3	★1

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
	prospects in the area.			
<p>Summary</p> <p>Of the approaches put forward for the Marlowe Road Estate site, it is Option Three that is <u>considered strongest</u> when taking into account all SA objectives. This option is predicted to result in significant positive effects in a number of respects. These are in terms of reducing crime (through improved layout and design); encouraging sustainable transport patterns and reducing traffic emissions (by making the best use of a central location); and conserving energy and reducing greenhouse gas emissions (by facilitating optimum energy efficiency, CHP viability and sustainable transport). In addition, this approach is the preferred option in terms of addressing deprivation, supporting the town centre, and encouraging inward investment and employment.</p> <p>Option Three's strength lies in its high density and redevelopment led approach. A redevelopment approach provides a high number of opportunities for improvement through design, whilst a large number of potential beneficiaries and consumers are provided by a high density. This high density also makes maximum use of the sites central location and the various sustainability benefits this confers.</p> <p>Option One in contrast offers the same opportunity for large scale improvements in terms of design, but at a lower density. Meanwhile, Option Three offers far more limited scope for whole-scale design improvements through its refurbishment led approach.</p> <p>The primary advantage of Option One is its focus on providing family homes, which will address and identified need for such housing in the Borough. This is in contrast to Option Three, which will focus on providing flats at high density, and Option Two, which will offer no change from the status quo in terms of housing mix. It is important that the need for family housing is addressed across the plan area. However, given the relative strength of Option Three in terms of sustainability, it is recommended that the highest density possible is achieved on this site (whilst ensuring that in combination the sites put forward in the plan-area meet locally identified family housing needs).</p>				

APPENDIX XIX: ALTERNATIVES APPRAISAL (BRANDON ROAD CAR PARK)

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 the 'Brandon Road Car Park' site:

1. 100% residential
2. Employment-led mixed use
3. 100% employment

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 Preferred Options Consultation Document.

Methodology

For each of the alternatives, the appraisal identifies and evaluates 'likely significant effects' on the baseline / likely future baseline, drawing on the sustainability issues 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.⁶⁸

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.⁶⁹ 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.

⁶⁸ As stated by Government Guidance (The Plan Making Manual, see <http://www.pas.gov.uk/pas/core/page.do?pagelid=156210>):

"Ultimately, the significance of an effect is a matter of judgment and should require no more than a clear and reasonable justification."

⁶⁹ Environmental Assessment of Plans and Programmes Regulations 2004

Appraisal findings

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	While there are no significant effects predicted for any of the options their relative merits can be discussed. Option One would result in the development of up to eight new residential units which would help contribute to this objective by increasing local housing provision. Option Two could potentially result in the creation of a small number of housing units which would also help contribute to this objective, though to a lesser extent than Option One. Option Three would not result in the creation of any new housing on the site and would therefore make no contribution to this objective.	★ 1	2	-
2. Reduce crime and the fear of crime	None of the options are predicted to result in any significant effects however their relative merits can be discussed. The site is currently a car park which is known to be underutilised and is bounded to the north and east by housing and industrial/storage uses to the south and west. All three options would lead to active uses on the site and as such all are predicted to have some positive effects in terms of the objective by increasing surveillance which should help to reduce crime and the fear of crime in the area. It is expected that the mixed use approach set out in Option Two could have a marginally more positive effect than Options One and Two by enabling a mix of uses which could lead to more consistent levels of activity throughout the day / night.	2	★ 1	2
3. Improve standard of health and wellbeing of those who live and work in the Borough	No implications.	-	-	-
4. Increase the provision of and access to community facilities to meet local	No implications.	-	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
cultural, recreational and social needs				
5. Improve educational attainment in schools	No implications.	-	-	-
6. Improve opportunities for access to education and training for all residents	No implications.	-	-	-
7. Reduce the overall level of deprivation	<p>The site, which currently operates as a car park and is considered to be underutilised, is located within an area considered to suffer from a high level of employment deprivation. All three options would result in new development on the site which would create construction jobs, and in doing so should have some positive effects on this objective in the short term by helping to reduce deprivation.</p> <p>The approaches set out in Options Two and Three would result in the creation of employment uses on the site which should facilitate job creation in the long term. However the development of the site completely for employment use, as proposed by Option Three, should result in an ever greater level of job creation than Option Two, and is therefore predicted to have the most significant positive effects in terms of reducing deprivation.</p>	3	2	1
8. Improve opportunities for access to local services, facilities and employment through an	No implications.	-	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
integrated sustainable transport system				
9. Reduce production of waste and increase recycling	No implications.	-	-	-
10. Reduce greenhouse gas emissions	No implications.	-	-	-
11. Conserve energy	No implications.	-	-	-
12. Improve air quality through a reduction in traffic-based emissions	While there are no significant effects predicted for any of the options their relative merits can be discussed. Although the site, which currently operates as a car park, has a low PTAL level of 2, it is located within walking distance of the train station and bus services therefore the Council would encourage any development schemes that come forward to provide a lower parking ratio than the maximum set out in the Council's parking policy. In addition all three options proposed would result in a significant reduction in the amount of car parking currently on the site therefore all options are considered to have a positive effect on this objective. The level of residential development set out by Option One takes into account the London Plan Density Matrix's suggested appropriate density for the area's PTAL level, which should further help to prevent increased greenhouse gas emissions as a result of car use.	★ 1	2	2
13. Improve water quality and ensure the efficient use of water resources	No implications.	-	-	-
14. Reduce	Wood Street is situated in Flood Zone 1 and has a low risk of flooding. As such, no significant effects are predicted in	-	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
the risk of flooding	relation to this SA objective.			
15. Reduce contamination and safeguard soil quality and quantity	No implications.	-	-	-
16. Make the best use of previously developed land (PDL) and existing buildings	All three approaches seek to make better use of this centrally located brownfield site by creating new development which would significantly reduce the amount of car parking. Options Two and Three would seek to create either employment-led mixed uses on site (Option Two) or solely employment uses (Option Three). Although both approaches would be expected to make better use of the site than the present use, as there is considered to be only limited demand for additional office use in the Wood Street AAP area, these approaches could potentially result in redundant provision of new office buildings on the site. As such the residential approach proposed by Option One is predicted to result in the most significant positive effects by making the best use of this centrally located brownfield site.	★ 1	2	3
17. Conserve and enhance biodiversity	No implications.	-	-	-
18. Protect the ecological integrity of Natura 2000 sites	No implications.	-	-	-
19. Maintain and enhance the quality of the green belt and open space areas.	No implications.	-	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
20. Conserve and, where appropriate, enhance the historic environment	No implications.	-	-	-
21. Maintain and enhance the vitality and viability of the Borough's town centres	While none of the approaches are expected to have any significant effects on this objective, all three approaches would have a positive effect by making better use of this centrally located brownfield site through creating new development which would increase activity on the site and significantly reduce the amount of car parking.	2	★ 1	2
22. Improve the local economy by attracting inward investment	No implications.	-	-	-
23. Maintain stable levels of employment in the Borough	The site is located within an area considered to suffer from a high level of employment deprivation. All three options would result in new development on the site which would create construction jobs, and in doing so should have some positive effects in the short term in terms of this objective. The approaches set out in Options Two and Three would create new employment uses on the site, which, although there is considered to be only limited demand for additional office use in the Wood Street AAP area, should facilitate increased job provision in the long term and have a positive effect in terms of this objective.	3	2	★ 1

Summary

There is very little to differentiate between the three options overall as they are all expected to have positive effects against a number of the SA objectives. All **three options** should help to tackle crime and the fear of crime through providing more active uses on the site and should make better use of the site through intensifying uses. They should also improve air quality through reducing the amount of car parking and should help to tackle deprivation through job creation, although **Options Two and Three** are expected to result in longer term **positive effects** in terms of this objective in comparison to **Option One**.

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	<u>Rank of preference</u>		
		Alt 1	Alt 2	Alt 3
	<p>In terms of their individual merits, it is notable that Option One is expected to help address local housing need. Should the mixed use element of Option Two include housing, this would also be expected to contribute to addressing local housing need, though to a slightly lesser extent than Option One.</p> <p>In addition, while all three options should help to improve air quality through a reduction in traffic-based emissions, the level of residential development set out by Option One takes into account the London Plan Density Matrix's suggested appropriate density for the area's PTAL level, which makes it the preferable option overall in terms of preventing increased greenhouse gas emissions as a result of car use.</p>			

APPENDIX XX: ALTERNATIVES APPRAISAL (WOODSIDE SCHOOL CAR PARK (BRIDGE 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 the 'Woodside School Car Park (Bridge Site)' site:

1. Residential-led mixed use development, possibly with educational use on ground floor along Wood Street
2. Retail use

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 Preferred Options Consultation Document.

Methodology

For each of the alternatives, the appraisal identifies and evaluates 'likely significant effects' on the baseline / likely future baseline, drawing on the sustainability issues 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.⁷⁰

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.⁷¹ 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.

⁷⁰ As stated by Government Guidance (The Plan Making Manual, see <http://www.pas.gov.uk/pas/core/page.do?pagelid=156210>):

"Ultimately, the significance of an effect is a matter of judgment and should require no more than a clear and reasonable justification."

⁷¹ Environmental Assessment of Plans and Programmes Regulations 2004

Appraisal findings

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	While neither option is predicted to result in any significant effects their relative merits can be discussed. The area in which the site is situated is considered to suffer from housing deprivation. Option One would result in the provision of new housing (between 7 and 17 units, depending on the quantum of the non-residential use of site) which would help to address local housing needs. In contrast the retail use proposed by Option Two would not result in the provision of any new housing therefore would make no contribution to this objective.	★ 1	2
2. Reduce crime and the fear of crime	The site which currently comprises of a car park is located in an area which is considered to suffer from deprivation in terms of levels of crime. Both redevelopment options are expected to increase activity on and around the site which in turn should increase natural surveillance thus helping to reduce crime and the fear of crime in the area, thereby having a positive effect on this objective. The residential-led mixed use approach proposed by Option One is considered likely to result in more continuous levels of activity on the site in comparison to the retail use proposed by Option Two which is expected to create activity on the site during business hours only. As such Option One is considered to be the favourable option in terms of this objective.	★ 1	2
3. Improve standard of health and wellbeing of those who live and work in the Borough	No implications.	-	-
4. Increase the provision of and access to community facilities to meet local	No implications.	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
cultural, recreational and social needs			
5. Improve educational attainment in schools	No implications.	-	-
6. Improve opportunities for access to education and training for all residents	<p>Although there are no significant effects predicted for either of the proposed options, their relative merits can be discussed. The approach set out in Option One would result in the creation of a residential-led mixed use development, potentially incorporating a new education use at ground level. Assuming the education element comes forward as part of Option One, this approach would be expected to help improve opportunities for access to education and training for residents in the surrounding area, thus having a positive effect in terms of this objective.</p> <p>In contrast the retail use proposed by Option Two would not include any provision of education facilities therefore it is considered to be the less preferable option in terms of this objective.</p>		2
7. Reduce the overall level of deprivation	The site is located in an area which is considered to suffer from a high level of employment deprivation, with its current use as a car park doing little to tackle deprivation levels locally. Both options seek the wholesale development of the site, with Option One seeking a residential-led mixed use development with a possible education use on the ground floor, and Option Two proposing a retail use. The residential-led approach of Option One would result in housing growth which should result in positive economic effects locally. With regards to Option Two, although the retail approach could have localised benefits in terms of tackling deprivation, it could also potentially undermine efforts to consolidate retail uses in the core retail area of the town centre. As such Option Two is predicted to have some negative effects in terms of the wider Wood Street area.		2
8. Improve opportunities for access to local services,	While neither option is predicted to result in any significant effects their relative merits can be discussed. Although it has a relatively low PTAL rating of two, the site is located in a relatively central location that is well connected to local transport links, including the rail station and local bus services, and is in fairly close proximity to shops and services in the Wood Street town centre (so reducing the need to travel). The site is therefore considered to have potential to provide opportunities to access		

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
facilities and employment through an integrated sustainable transport system	services using sustainable modes of transport; as such both approaches set out are predicted to have a positive effect on this objective. In recognition of the site's proximity to the train station, the Council would seek any redevelopment proposals to provide a lower parking ratio than that required by the Council's parking policy which is also expected to have a positive effect in terms of reducing peoples' reliance on less sustainable forms of transport.		
9. Reduce production of waste and increase recycling	No implications.	-	-
10. Reduce greenhouse gas emissions	No implications.	-	-
11. Conserve energy	No implications.	-	-
12. Improve air quality through a reduction in traffic-based emissions	Whilst neither of the options presented are predicted to result in a significant effect, their relative merits can be discussed. The site is located in an area of low public transport accessibility, which is reflected in its PTAL 2 rating. However the site is located in an area that is well connected to local transport links including the rail station and local bus services. As such, there should be opportunities for access to services through sustainable transport as a result of the approaches set out by both options . In addition, both options would result in the wholesale development of the site which would lead to a reduction in the extent of car parking currently on the site which in turn should help to limit car use and associated greenhouse gas emissions . In terms of their relative merits, the level of residential development proposed by Option One takes into account the London Plan Density Matrix's suggested appropriate density for the area's PTAL level, which should also help to prevent increased greenhouse gas emissions as a result of car use.	★ 1	2
13. Improve water quality and ensure the	No implications.	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
efficient use of water resources			
14. Reduce the risk of flooding	Wood Street is situated in Flood Zone 1 and has a low risk of flooding. As such, no significant effects are predicted in relation to this SA objective.	-	-
15. Reduce contamination and safeguard soil quality and quantity	No implications.	-	-
16. Make the best use of previously developed land (PDL) and existing buildings	In light of the site's current use as a car park, coupled with its location in a key area of the AAP area, the site is considered to be underutilised. Both options seek to completely redevelop the site and in doing so are expected to make more efficient use of the land. Not only would both options involve the removal of the existing car park, but the Council would seek for the redevelopment to provide a lower parking ratio than the maximum parking standards set out in the Development Management policy, as a result this should help to ensure that both options would make better use of the site than at present. In terms of their relative merits, the retail approach of Option Two could potentially undermine efforts to consolidate retail uses in the core retail area of the town centre which could lead to some negative effects in terms of the wider Wood Street area. Consequently the residential-led approach of Option One is considered to present a better use of the land and thus is the preferable option in terms of this objective.	★ 1	2
17. Conserve and enhance biodiversity	No implications.	-	-
18. Protect the ecological integrity of Natura 2000 sites	No implications.	-	-
19. Maintain and enhance	No implications.	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
the quality of the green belt and open space areas.			
20. Conserve and, where appropriate, enhance the historic environment	No implications.	-	-
21. Maintain and enhance the vitality and viability of the Borough's town centres	Whilst no significant effects are anticipated for either option put forward, their relative merits can be discussed. Development in the Station area cluster is seen as an opportunity to enhance underutilised sites in a key area of Wood Street. Both options should lead to townscape improvements which should help to enhance the vitality and viability of the local area. However, by providing a residential-led mixed use development, the approach set out in Option One is expected to lead to housing growth which should better support the town centre. In contrast, the retail approach set out by Option Two could potentially undermine efforts to consolidate retail uses in the core retail area of the town centre which could lead to some negative effects in terms of the wider Wood Street area.	★ 1	2
22. Improve the local economy by attracting inward investment	No implications.	-	-
23. Maintain stable levels of employment in the Borough	Whilst no significant effects are anticipated for either option put forward, their relative merits can be discussed. Development in the Station area cluster is seen as an opportunity to enhance underutilised sites in a key area of Wood Street. The site is located within an area considered to suffer from a high level of employment deprivation. Option One is expected to result in the creation of new homes which may support local economic development and employment gains. While the retail approach proposed by Option Two would be expected to lead to on site job creation it could also potentially undermine efforts to consolidate retail uses in the core retail area of the town centre which could lead to some negative effects in terms of employment levels in the wider	★ 1	2

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
	Wood Street area.		
<p>Summary</p> <p>The residential-led mixed use approach, potentially incorporating an education use, proposed by Option One is <u>considered to perform well</u> against the SA objectives. It is predicted to result in positive effects in terms of housing provision as the increased housing growth should help to provide support to local businesses and Wood Street’s town centre. In addition the approach is expected to help support reductions in deprivation and crime, make better use of a key brownfield site and bring about positive changes in terms of reducing traffic-based emissions. Subject to the education element of this option coming forward, it is also expected to help provide improved opportunities for access to education facilities.</p> <p>Although Option Two performs less well than Option One against the SA objectives, it is expected to have some positive effects through bringing what is currently a largely inactive site into a more active use, improving opportunities for access to local services, facilities and employment through an integrated sustainable transport system, improving air quality through a reduction in traffic-based emissions and leading to on-site job creation.</p>			

APPENDIX XXI: ALTERNATIVES APPRAISAL (SCOUT HALL AND CHURCH (FORMER FACTORY))

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 the 'Scout Hall and Church (former factory)' site:

1. Residential development with social/community use on ground floor
2. 100% residential

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 Preferred Options Consultation Document.

Methodology

For each of the alternatives, the appraisal identifies and evaluates 'likely significant effects' on the baseline / likely future baseline, drawing on the sustainability issues 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.⁷²

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.⁷³ 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.

⁷² As stated by Government Guidance (The Plan Making Manual, see <http://www.pas.gov.uk/pas/core/page.do?pagelid=156210>):

"Ultimately, the significance of an effect is a matter of judgment and should require no more than a clear and reasonable justification."

⁷³ Environmental Assessment of Plans and Programmes Regulations 2004

Appraisal findings

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	While neither option is predicted to result in any significant effects their relative merits can be discussed. The area in which the site is situated is considered to suffer from housing deprivation. Both options would result in the provision of new housing on the site which would help to address local housing needs. However the approach proposed by Option Two would result in the creation of a higher number of new dwellings (up to 14 units) than Option One (around 6 units) and is therefore expected to have more positive effects in terms of this objective.	2	★ 1
2. Reduce crime and the fear of crime	Neither option is predicted to result in any significant effects; however their relative merits can be discussed. Both approaches are expected to increase activity on and around the site which should increase natural surveillance thus helping to reduce crime and the fear of crime. However the mixed-use approach proposed by Option One is expected to result in more continuous activity on the site in comparison to the solely residential approach set out in Option Two. As such while both approaches are expected to have some positive effects on this objective, Option One is the preferable option.	★ 1	2
3. Improve standard of health and wellbeing of those who live and work in the Borough	No implications.	-	-
4. Increase the provision of and access to community facilities to meet local cultural,	The site is currently home to low grade buildings that are used by a church group and the scouts. While the approach set out in Option One would not provide an increase in social/community infrastructure, it would improve the quality of existing provision through providing a new purpose built social/community use as part of the new development. In contrast the 100% residential approach set out in Option Two is expected to have a significant negative effect on this objective as it would not seek to re-provide community uses on site which may result in these facilities being lost from within the Wood Street AAP area.	★ 1	2

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
recreational and social needs			
5. Improve educational attainment in schools	No implications.	-	-
6. Improve opportunities for access to education and training for all residents	No implications.	-	-
7. Reduce the overall level of deprivation	While neither option is predicted to result in any significant effects their relative merits can be discussed. Both options seek the wholesale redevelopment of the site, which will involve the reconfiguration of the site's layout and demolition of the existing low grade buildings on site. Both options are expected to have some positive effects in terms of this objective through providing new housing that should support the growth of the town centre. However Option One is considered to perform better than Option Two as it will seek to re-provide the existing social/community infrastructure on site which should help to reduce local levels of deprivation.	★ 1	2
8. Improve opportunities for access to local services, facilities and employment through an integrated sustainable	While neither option is predicted to result in any significant effects their relative merits can be discussed. Although it has a relatively low PTAL rating of two, the Scout Hall and Church (former factory) site is located in a relatively central location that is well connected to local transport links, including the rail station and local bus services, and is in close proximity to shops and services in the Wood Street town centre (so reducing the need to travel). The site is therefore considered to have potential to provide opportunities to access services using sustainable modes of transport; as such both approaches set out are predicted to have a positive effect on this objective. In recognition of the site's proximity to the train station, the Council would seek any redevelopment proposals to provide a lower parking ratio than that required by the Council's parking policy which is also expected to have a positive effect in terms of reducing peoples' reliance on less sustainable forms of transport.	★ 1	★ 1

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
transport system			
9. Reduce production of waste and increase recycling	No implications.	-	-
10. Reduce greenhouse gas emissions	No implications.	-	-
11. Conserve energy	No implications.	-	-
12. Improve air quality through a reduction in traffic-based emissions	Whilst neither of the options presented are predicted to result in a significant effect, their relative merits can be discussed. The site is located in an area of low public transport accessibility, which is reflected in its PTAL 2 rating. However, a bus stop is located within close proximity to the site (less than 30m away) and the train station is located less than 150m away. As such, there should be opportunities for access to services through sustainable transport as a result of the approaches set out by both options. In addition, both options would result in the complete redevelopment of the site which would seek to reduce the extent of car parking currently on the site; a reduction in car parking provision should help to limit car use and associated greenhouse gas emissions. Furthermore the level of residential development proposed by both options takes into account the London Plan Density Matrix's suggested appropriate density for the area's PTAL level, which should also help to prevent increased greenhouse gas emissions as a result of car use.		
13. Improve water quality and ensure the efficient use of water resources	No implications.	-	-
14. Reduce the	Wood Street is situated in Flood Zone 1 and has a low risk of flooding. As such, no significant effects are predicted in relation to	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
risk of flooding	this SA objective.		
15. Reduce contamination and safeguard soil quality and quantity	No implications.	-	-
16. Make the best use of previously developed land (PDL) and existing buildings	Development in the Station area cluster is seen as an opportunity to enhance underutilised sites in a key area of Wood Street. The site is currently underutilised with a significant part of it used for car parking. Both options seek to completely redevelop the site and in doing so intensify the current uses. The Council would seek for the redevelopment to reduce the amount of car parking on site which should help to ensure that both options would make better use of the site than at present. Option One seeks to retain social/community uses on site through re-providing facilities as part of the re-development. In contrast, while the 100% residential approach set out in Option Two would result in greater provision of housing which would help to meet more of the local housing need, it would also result in the loss of valued community/social infrastructure in the area. On balance, Option One is therefore considered to perform better in terms of this objective.	★ 1	2
17. Conserve and enhance biodiversity	No implications.	-	-
18. Protect the ecological integrity of Natura 2000 sites	No implications.	-	-
19. Maintain and enhance the quality of the green belt and open space areas.	No implications.	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
20. Conserve and, where appropriate, enhance the historic environment	No implications.	-	-
21. Maintain and enhance the vitality and viability of the Borough's town centres	Whilst no significant effects are anticipated for either option put forward, their relative merits can be discussed. Development in the Station area cluster is seen as an opportunity to enhance underutilised sites in a key area of Wood Street. Both options should lead to townscape improvements which should help to enhance the vitality and viability of the Wood Street town centre. However, by providing a mix of residential and valued social/community infrastructure on the site, the approach set out in Option Two is expected to lead to a mix of uses which should better support the town centre than Option One which proposes solely residential use on the site.	★ 1	2
22. Improve the local economy by attracting inward investment	No implications.	-	-
23. Maintain stable levels of employment in the Borough	Whilst no significant effects are anticipated for either option put forward, their relative merits can be discussed. Development in the Station area cluster is seen as an opportunity to enhance underutilised sites in a key area of Wood Street. The site is located within an area considered to suffer from a high level of employment deprivation. Both options are expected to result in the creation of new homes which may support local economic development and employment gains. However Option Two should result in a higher number of new housing than Option One which in turn is expected to make a slightly greater contribution to this objective.	2	★ 1
<p>Summary</p> <p><u>Both options put forward</u> should be capable of helping to address local housing need, of reducing crime and the fear of crime around the site, tackling deprivation, enhancing the vitality and viability of Wood Street's town centre, maintaining stable levels of employment in the area, and improving opportunities for access to local services, facilities and employment through an integrated sustainable transport system. In addition both options should reduce the extent of car parking on site which should help to improve air quality through reducing traffic-based emissions and should make better use of this brownfield site.</p> <p>In terms of the merits of each of the options, it is notable that Option One seeks to both retain and improve the quality of social/community infrastructure facilities on</p>			

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
	site while Option Two is likely to result in these facilities being lost from within the Wood Street AAP area, thus leading to a significant negative effect in terms of this objective.		

APPENDIX XXII: ALTERNATIVES APPRAISAL (DAIRY 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 the 'Dairy Site':

1. Residential-led mixed use development with commercial use on ground floor along Wood Street and residential above
2. Retail use

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 Preferred Options Consultation Document.

Methodology

For each of the alternatives, the appraisal identifies and evaluates 'likely significant effects' on the baseline / likely future baseline, drawing on the sustainability issues 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.⁷⁴

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.⁷⁵ 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.

⁷⁴ As stated by Government Guidance (The Plan Making Manual, see <http://www.pas.gov.uk/pas/core/page.do?pagelD=156210>):



"Ultimately, the significance of an effect is a matter of judgment and should require no more than a clear and reasonable justification."

⁷⁵ Environmental Assessment of Plans and Programmes Regulations 2004

Appraisal findings

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	No significant effects are predicted for either of the options. Nonetheless, their relative merits can be discussed. The Dairy Site area is regarded as being in an area of housing deprivation. Of the options presented, the approach set out through Option One is most likely to help in the meeting of local housing need as it looks to provide residential units as part of a mixed-use designation (between 7 and 15 units dependent on the quantum of non-residential use). This will result in an increase in housing provision from the site, as it is currently largely occupied by business uses. In contrast, a complete conversion to retail use will fail to contribute housing and so will not help to address identified need in the plan area.	★ 1	2
2. Reduce crime and the fear of crime	Whilst neither of the options presented is predicted to result in any significant effects, their relative merits can be discussed. The Dairy Site is within an area of deprivation in terms of crime. The mixed-use approach put forward Option One should help to ensure that there is continuous activity on the site, so potentially reducing crime and the fear of crime in the area. In contrast Option Two is likely to lead to periods of time where the site is relatively deserted (i.e. in or out of business hours), so reducing levels of natural surveillance in the area.	★ 1	2
3. Improve standard of health and wellbeing of those who live and work in the Borough	No implications.	-	-
4. Increase the provision of and access to community facilities to meet local cultural,	No implications.	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
recreational and social needs			
5. Improve educational attainment in schools	No implications.	-	-
6. Improve opportunities for access to education and training for all residents	No implications.	-	-
7. Reduce the overall level of deprivation	No significant effects are predicted for either of the options. Nonetheless, their relative merits can be discussed. The Dairy Site currently has an employment function and is located within an area considered to suffer from a high level of employment deprivation. It is not clear whether the pursuit of Option One, with its residential led approach to redevelopment, will lead to losses in employment space (the site is largely used by businesses at present), or whether residential units will be incorporated through intensification. If employment uses are lost in this location this may cause localised declines in employment, perhaps increasing deprivation. However, it should be noted that an increase in residential use here may support local businesses and the Wood Street town centre, potentially countering any localised decline. Meanwhile, whilst it may result in localised gains in employment space and associated reductions in deprivation, Option Two's focus on converting the site to entirely retail uses may undermine the town centre of Wood Street by working against attempts to consolidate such uses in the District Centre. As a result, this option could have localised benefits in terms of deprivation, but negative effects when considering the wider Wood Street area. Overall, it is considered likely that the balanced approach of Option One is most likely to support both local employment and also the wider Wood Street economy and so will do most to address deprivation.		2
8. Improve opportunities for access to	No significant effects are predicted for any of the alternatives put forward. Their relative merits can, however, be discussed. The Dairy Site is within an area of moderate overall public overall transport accessibility, as shown by its PTAL 3 rating. A bus stop is also close by to the site (7m away). As such, there should be opportunities for access to services through sustainable transport. By		2

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
local services, facilities and employment through an integrated sustainable transport system	pursuing a mixed-development approach, Alternative One may help to reduce the need to travel for employment and services, so potentially reliving pressure on the transport system. As such, it is considered to be the preferred alternative for this SA objective.		
9. Reduce production of waste and increase recycling	No implications.	-	-
10. Reduce greenhouse gas emissions	No significant effects are predicted for either option put forward. Their relative merits can, however, be discussed. The Dairy Site is within an area of low public overall transport accessibility, as shown by its PTAL 2 rating. However, a bus stop is close to the site (7m away). As such, there should be opportunities for at least some access to services through sustainable transport. By pursuing a mixed-development approach, Option One may help to reduce the need to travel for employment and services, so potentially reducing the use of transport and the emissions that can be associated with it. As such, it is considered to be the preferred alternative for this SA objective.		2
11. Conserve energy	No implications.	-	-
12. Improve air quality through a reduction in traffic-based emissions	No significant effects are predicted for either option put forward. Their relative merits can, however, be discussed. The Dairy Site is within an area of low public overall transport accessibility, as shown by its PTAL 2 rating. However, a bus stop is close to the site (7m away). As such, there should be opportunities for at least some access to services through sustainable transport. By pursuing a mixed-development approach, Option One may help to reduce the need to travel for employment and services, so potentially reducing the use of transport and the emissions that can be associated with it. As such, it is considered to be the <u>preferred alternative</u> for this SA objective.		2

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
13. Improve water quality and ensure the efficient use of water resources	No implications.	-	-
14. Reduce the risk of flooding	Wood Street is situated in Flood Zone 1 and has a low risk of flooding. As such, no significant effects are predicted in relation to this SA objective.	-	-
15. Reduce contamination and safeguard soil quality and quantity	No implications.	-	-
16. Make the best use of previously developed land (PDL) and existing buildings	No implications.	-	-
17. Conserve and enhance biodiversity	No implications.	-	-
18. Protect the ecological integrity of Natura 2000 sites	No implications.	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
19. Maintain and enhance the quality of the green belt and open space areas.	No implications.	-	-
20. Conserve and, where appropriate, enhance the historic environment	No implications.	-	-
21. Maintain and enhance the vitality and viability of the Borough's town centres	The mixed use approach put forward through Option One will provide housing growth which may work to support the vitality and viability of the nearby Wood Street town centre. In addition, commercial land uses are favoured over retail uses, so ensuring that development here does not unduly compete with businesses in the town centre. This is in contrast to Option Two which looks to convert the site to entirely retail uses. This may undermine the town centre of Wood Street by working against attempts to consolidate such uses in the District Centre, so reducing its vitality and viability. As a result, this option is predicted to result in significant negative effects against the baseline.	★ 1	2
22. Improve the local economy by attracting inward investment	No significant effects are predicted for any of the alternatives put forward. Their relative merits can however be discussed. Of the approaches put forward, Option Two is considered the least likely to bring about improvements to the local economy through increased inward investment. This due to its focus on converting the site to retail uses may undermine the town centre of Wood Street by working against attempts to consolidate such uses in the District Centre. Any decline in the vitality and viability of the town centre may make the Wood Street area less attractive to inward investment. Meanwhile, Option One is considered to be the <u>preferred approach</u> as it looks to provide opportunities for investment in business on the site whilst also allowing for housing growth that may help to support Wood Street town centre.	★ 1	2
23. Maintain stable levels of employment in	No significant effects are predicted for either of the options. Nonetheless, their relative merits can be discussed. The Dairy Site currently has an employment function and is located within an area considered to suffer from a high level of employment deprivation. It is not clear whether the pursuit of Option One, with its residential led approach to redevelopment, will lead to losses	★ 1	2

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
the Borough	<p>in employment space (the site is largely used by businesses at present), or whether residential units will be incorporated through intensification. If employment uses are lost in this location this may cause localised declines in employment. However, it should be noted that an increase in residential use here may support local businesses and the Wood Street town centre, potentially countering any localised decline. Meanwhile, whilst it may result in localised gains in employment space, Option Two's focus on converting the site to entirely retail uses may undermine the town centre of Wood Street by working against attempts to consolidate such uses in the District Centre. As a result, this alternative could have localised benefits in terms of employment, but negative effects when considering the wider Wood Street area. Overall, it is considered likely that the balanced approach of Option One is most likely to support both local employment and also the wider Wood Street economy and so will do most to provide employment gains.</p>		
<p>Summary</p> <p>The residential led, mixed-use approach to the redevelopment of the Dairy Site proposed through Option One is <u>considered to perform well</u> against the SA objectives. It is predicted to result in positive effects in terms of housing provision, and as a result of the increased support such housing growth will potentially provide to local businesses and the Wood Street town centre. This, along with a focus on commercial rather than retail uses (which could compete with the District Centre), may help to support reductions in deprivation, increased employment, and inward investment. A mixed-use approach is also likely to lead to gains in terms of crime reduction, plus changes in transport patterns and associated emission reductions.</p> <p>In contrast, an entirely retail led approach, as set out in Option Two, is likely to result in competition with the town centre which may result in significant negative effects in terms of its vitality and viability. Whilst this option may have localised benefits in relation to employment and reductions in deprivation, it is less likely to support such reductions across the whole Wood Street area. In addition, a single use approach is less likely to discourage crime and support sustainable patterns of transport.</p>			

APPENDIX XXIII: ALTERNATIVES APPRAISAL (CROWNLEA 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 the 'Crownlea Site':

1. A residential-led mixed use or residential only development scheme
2. Retail use
3. Partial redevelopment to 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 Preferred Options Consultation Document.

Methodology

For each of the alternatives, the appraisal identifies and evaluates 'likely significant effects' on the baseline / likely future baseline, drawing on the sustainability issues 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.⁷⁶

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.⁷⁷ 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.

⁷⁶ As stated by Government Guidance (The Plan Making Manual, see <http://www.pas.gov.uk/pas/core/page.do?pagelid=156210>):

"Ultimately, the significance of an effect is a matter of judgment and should require no more than a clear and reasonable justification."

⁷⁷ Environmental Assessment of Plans and Programmes Regulations 2004

Appraisal findings

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	No significant effects are predicted for any of the options put forward. Nonetheless, their relative merits can be discussed. The Crownlea Site area is regarded as being in an area of housing deprivation. Of the options presented, the approach set out through Option One is most likely to help in the meeting of local housing need as it looks to provide flats and homes as part of a residential mixed-use or residential only designation (between 40 and 90 units. This will result in an increase in housing provision from the site, as it is currently largely occupied by storage and community uses. In contrast, a complete conversion to retail use, as proposed by Option Two will fail to contribute housing and so will not help to address identified need in the plan area. Meanwhile, Option Three's partial release of land is likely to result in a lower quantum of housing being delivered than the comprehensive, site-wide approach outlined in Option One .	★ 1	3	2
2. Reduce crime and the fear of crime	Whilst none of the options presented are predicted to result in a significant effect, their relative merits can be discussed. The Dairy Site is within an area of deprivation in terms of crime. The mixed-use approaches put forward in Options One and Three should help to ensure that there is continuous activity on the site, so potentially reducing crime and the fear of crime in the area. In contrast Option Two is likely to lead to periods of time where the site is relatively deserted (i.e. out of business hours), so reducing levels of natural surveillance in the area. The comprehensive, site wide approach of Option One is meanwhile more likely to allow changes in design that reduce crime (such as increasing natural surveillance at the front of the site) than the partial redevelopment proposed through Option Three (which would focus on those buildings not fronting on Wood Street alone). As a result, Option One is <u>preferred</u> in this instance.	★ 1	3	2
3. Improve standard of health and wellbeing of those who live and work in the Borough	No significant effects are predicted for any of the options put forward. However, their relative merits can be discussed. The comprehensive redevelopment of the site proposed through Option One is most likely to maximise access to the open space adjoining the rear of the area, with a link to be explored along the site's eastern boundary. Access to such space could result in positive effects in terms of the health and wellbeing of those in the locality. A similar link could be delivered through the retail development of Option Two . However, given the lack of residential housing to be incorporated through this alternative, this may represent a missed opportunity to place residents in close proximity to greenspace. Meanwhile, Option Three's partial redevelopment of the rear of the site is least likely to create a new accessible route to the open space. This is due to a lower likely contribution from development and the focus of any new development on the back of the site, away from Wood Street.	★ 1	2	3
4. Increase the provision of	No implications. It is expected that any development brought forward on this site will incorporate the community uses present, or will reprovide any that are displaced.	-	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
and access to community facilities to meet local cultural, recreational and social needs				
5. Improve educational attainment in schools	No implications.	-	-	-
6. Improve opportunities for access to education and training for all residents	No implications.	-	-	-
7. Reduce the overall level of deprivation	<p>No significant effects are predicted for either of the options. Nonetheless, their relative merits can be discussed. The Crownlea Site currently has some employment functions (warehousing and storage) and is located within an area considered to suffer from a high level of employment deprivation. It is not clear whether the pursuit of Option One, with its proposed residential mixed-use or residential only designation, will lead to an overall loss in employment on the site (this would be likely in the latter case). If employment uses are lost in this location this may cause localised declines in employment, perhaps increasing deprivation. The same concern applies here to Option Three, albeit the losses in employment space may be less given the partial nature of the redevelopment proposed. However, it should be noted that an increase in residential use on this site may support local businesses and the Wood Street town centre, potentially countering any localised decline that occurs. As a result, the likely higher quantum of housing set out through Option One may be preferable in this respect.</p> <p>Meanwhile, whilst it may result in localised gains in employment space and associated reductions in deprivation, Option</p>	★ 1	3	2

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
	Two's focus on converting the site to entirely retail uses may undermine the town centre of Wood Street by working against attempts to consolidate such uses in the District Centre. As a result, this alternative could have localised benefits in terms of deprivation, but negative effects when considering the wider Wood Street area. Overall, it is considered likely that the balanced approach of Option One is most likely to support both local employment and also the wider Wood Street economy (with the town centre representing a significant concern in this respect) and so will do most to address deprivation.			
8. Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system	No significant effects are predicted for any of the alternatives put forward. Their relative merits can, however, be discussed. The Crownlea Site is within an area of low-moderate overall public overall transport accessibility, as shown by its PTAL 2-3 rating. A bus stop is somewhat distant from the site (49m away). Overall, there should be some scope for access to services through sustainable transport. By pursuing a mixed-development approach, Alternatives One and Two may help to reduce the need to travel for employment and services, so potentially relieving pressure on the transport system (although it should be noted that a residential only approach may be pursued through Alternative One). Such positive changes in transport patterns are less liable to occur through Alternative Two's retail only approach, although the provision of local shops may reduce the need of some residents to travel into the Wood Street centre. In terms of access to transport accessibility, Alternative Three may however have negative consequences due to its focus primarily on the rear of the area, away from the Wood Street entrance. Such issues are likely to be more easily avoided through a comprehensive development of the site as proposed by Alternatives One and Two.	★ 1	2	3
9. Reduce production of waste and increase recycling	No implications.	-	-	-
10. Reduce greenhouse gas emissions	No significant effects are predicted for any of the options put forward. Their relative merits can, however, be discussed. The Crownlea Site is within an area of low-moderate overall public overall transport accessibility, as shown by its PTAL 2-3 rating. A bus stop is somewhat distant from the site (49m away). Overall, there should be some scope for access to services through sustainable transport. By pursuing a mixed-development approach, Options One and Three may help to reduce the need to travel for employment and services, so potentially reducing the need to travel and the emissions associated with this (although it should be noted that a residential only approach may be pursued through Option One).	★ 1	2	★ 1

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
	Such positive changes in transport patterns are less liable to occur through Option Two's retail only approach, although the provision of local shops may reduce the need of some residents to travel into the Wood Street centre.			
11. Conserve energy	No implications.	-	-	-
12. Improve air quality through a reduction in traffic-based emissions	No significant effects are predicted for any of the options put forward. Their relative merits can, however, be discussed. The Crownlea Site is within an area of low-moderate overall public overall transport accessibility, as shown by its PTAL 2-3 rating. A bus stop is somewhat distant from the site (49m away). Overall, there should be some scope for access to services through sustainable transport. By pursuing a mixed-development approach, Options One and Three may help to reduce the need to travel for employment and services, so potentially reducing the need to travel and the emissions associated with this (although it should be noted that a residential only approach may be pursued through Option One). Such positive changes in transport patterns are less liable to occur through Option Two's retail only approach, although the provision of local shops may reduce the need of some residents to travel into the Wood Street centre.	★ 1	2	★ 1
13. Improve water quality and ensure the efficient use of water resources	No implications.	-	-	-
14. Reduce the risk of flooding	Wood Street is situated in Flood Zone 1 and has a low risk of flooding. As such, no significant effects are predicted in relation to this SA objective.			
15. Reduce contamination and safeguard soil quality and quantity	No implications.	-	-	-
16. Make the best use of previously	No implications.	-	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
developed land (PDL) and existing buildings				
17. Conserve and enhance biodiversity	Whilst none of the options presented are predicted to result in a significant effect, their relative merits can be discussed. Development proposals put forward for the site are to include planting and landscaping to help create a network of green infrastructure in the area. The establishment of such a network in a comprehensive fashion is more likely through Options One and two , with their site-wide approaches, as opposed to Option Three's partial redevelopment of the site.	★ 1	★ 1	2
18. Protect the ecological integrity of Natura 2000 sites	No implications.	-	-	-
19. Maintain and enhance the quality of the green belt and open space areas.	No implications.	-	-	-
20. Conserve and, where appropriate, enhance the historic environment	No implications.	-	-	-
21. Maintain and enhance the vitality and viability of the Borough's	The mixed use approach or residential only put forward through Option One will provide housing growth which may work to support the vitality and viability of the nearby Wood Street town centre. Option Three meanwhile will provide a lower quantum of housing development, and so lesser support t the centre. Finally, Option Two's conversion of the site to entirely retail uses may undermine the town centre of Wood Street by working against attempts to consolidate such uses in the	★ 1	3	2

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
town centres	District Centre, so reducing its vitality and viability. As a result, this option is predicted to result in significant negative effects against the baseline.			
22. Improve the local economy by attracting inward investment	No significant effects are predicted for any of the options put forward. Their relative merits can however be discussed. Of the approaches put forward, Option Two is considered the least likely to bring about improvements to the local economy through increased inward investment. This is due to its focus on converting the site to retail uses may undermine the town centre of Wood Street by working against attempts to consolidate such uses in the District Centre. Any decline in the vitality and viability of the town centre may make the Wood Street area less attractive to inward investment. Meanwhile, Option One is considered to be the preferred approach as it looks to provide the maximum amount of housing growth from the site (more so than Option Three) and as a result is likely to support the town centre and so the wider investment potential of the Wood Street area.	★ 1	3	2
23. Maintain stable levels of employment in the Borough	No significant effects are predicted for either of the alternatives. Nonetheless, their relative merits can be discussed. The Crownlea Site currently has some employment functions (warehousing and storage) and is located within an area considered to suffer from a high level of employment deprivation. It is not clear whether the pursuit of Option One , with its proposed residential mixed-use or residential only designation, will lead to an overall loss in employment on the site (this would be likely in the latter case). If employment uses are lost in this location this may cause localised declines in employment. The same concern applies here to Option Three , albeit the losses in employment space may be less given the partial nature of the redevelopment proposed. However, it should be noted that an increase in residential use on this site may support local businesses and the Wood Street town centre, potentially countering any localised decline in employment that occurs. As a result, the likely higher quantum of housing set out through Option One may be preferable in this respect. Meanwhile, whilst it may result in localised gains in employment space, Option Two's focus on converting the site to entirely retail uses may undermine the town centre of Wood Street by working against attempts to consolidate such uses in the District Centre. As a result, this option could have localised benefits in terms of employment, but negative effects when considering the wider Wood Street area. Overall, it is considered likely that the balanced approach of Option One is most likely to support both local employment and also the wider Wood Street economy (with the town centre representing a significant concern in this respect) and the jobs provided at this scale.	★ 1	3	2
Summary				
The residential mixed-use or residential only approach set out through Option One is <u>considered to perform well</u> against the SA objectives. It is predicted to result				

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference		
		Alt 1	Alt 2	Alt 3
	<p>in positive effects in terms of housing provision, as a result of the increased support such housing growth will potentially provide to local businesses and the Wood Street town centre. This approach may help to support reductions in deprivation, increased employment, and inward investment. A mixed-use approach (if pursued over full residential) is also likely to lead to gains in terms of crime reduction, plus changes in transport patterns and associated emission reductions.</p> <p>In contrast, an entirely retail led approach, as set out in Option Two, is likely to result in competition with the town centre which may result in significant negative effects in terms of its vitality and viability. Whilst this option may have localised benefits in relation to employment and reductions in deprivation, it is less likely to support such reductions across the whole Wood Street area. In addition, a single use approach is less likely to discourage crime and support sustainable patterns of transport (however, these disadvantages would also apply to Option One should a non-mixed use approach be pursued).</p> <p>Finally, Option Three is less likely to achieve the same level of housing growth as Option One due to its partial release of land. As a result, the maximum potential of the site is unlikely to be achieved. For instance, high standards of transport accessibility, green infrastructure provision and access to open spaces are less likely to be achieved through a partial development of the site as a result of lower developer contributions and reduced land availability.</p>			

APPENDIX XXIV: ALTERNATIVES APPRAISAL (LUCERNE)

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 the 'Lucerne' site:

1. Residential development of whole site
2. Partial redevelopment

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 Preferred Options Consultation Document.

Methodology

For each of the alternatives, the appraisal identifies and evaluates 'likely significant effects' on the baseline / likely future baseline, drawing on the sustainability issues 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.⁷⁸

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.⁷⁹ 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.

⁷⁸ As stated by Government Guidance (The Plan Making Manual, see <http://www.pas.gov.uk/pas/core/page.do?pagelid=156210>):

"Ultimately, the significance of an effect is a matter of judgment and should require no more than a clear and reasonable justification."

⁷⁹ Environmental Assessment of Plans and Programmes Regulations 2004

Appraisal findings

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
1. Meet local housing needs through the provision of a range of tenures and sizes of new dwellings	No significant effects are predicted for either of the options put forward. Nonetheless, their relative merits can be discussed. The Lucerne Site area is regarded as being in an area of housing deprivation. The development of the whole of the site to residential uses, as proposed through Option One , is likely to result in the creation of between 15 and 35 units. This is likely to lead to positive effects in terms of meeting local housing need. Option Two's partial redevelopment of the site may also contribute to this need, but to a lesser extent. This is due to the less efficient use of land and the reduction in site viability that may result from keeping the buildings at the front of the site in place.	★ 1	2
2. Reduce crime and the fear of crime	Whilst neither of the options presented are predicted to result in a significant effect, their relative merits can be discussed. The Lucerne Site is within an area of deprivation in terms of crime. The complete redevelopment of the site through Option One may present a better opportunity to develop the site in a manner which reduces crime 'by design. In particular, there may be opportunities to provide frontages onto Wood Street that improve natural surveillance in comparison to current levels. This may be less liable to occur should the buildings at the front of the site be maintained, as proposed through Option Two .	★ 1	2
3. Improve standard of health and wellbeing of those who live and work in the Borough	No implications.	-	-
4. Increase the provision of and access to community facilities to meet local cultural,	No implications.	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
recreational and social needs			
5. Improve educational attainment in schools	No implications.	-	-
6. Improve opportunities for access to education and training for all residents	No implications.	-	-
7. Reduce the overall level of deprivation	No significant effects are predicted for either of the options put forward. Nonetheless, their relative merits can be discussed. The Lucerne site is located within an area considered to suffer from a high level of employment deprivation. The development of the whole of the site to residential uses, as proposed through Option One, is likely to result in the creation of new homes, which may potentially support local economic development and job creation, so helping to tackle deprivation. Option Two's partial redevelopment of the site may also contribute towards housing growth and associated employment gains, but to a lesser extent. This is due to the less efficient use of land and the reduction in site viability that may result from keeping the buildings at the front of the site in place.	★ 1	2
8. Improve opportunities for access to local services, facilities and employment through an integrated	No implications.	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
sustainable transport system			
9. Reduce production of waste and increase recycling	No implications.	-	-
10. Reduce greenhouse gas emissions	No implications.	-	-
11. Conserve energy	No implications.	-	-
12. Improve air quality through a reduction in traffic-based emissions	No implications.	-	-
13. Improve water quality and ensure the efficient use of water resources	No implications.	-	-
14. Reduce the risk of flooding	Wood Street is situated in Flood Zone 1 and has a low risk of flooding. As such, no significant effects are predicted in relation to this SA objective.	-	-
15. Reduce contamination	No implications.	-	-

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
and safeguard soil quality and quantity			
16. Make the best use of previously developed land (PDL) and existing buildings	No implications.	-	-
17. Conserve and enhance biodiversity	No implications.	-	-
18. Protect the ecological integrity of Natura 2000 sites	No implications.	-	-
19. Maintain and enhance the quality of the green belt and open space areas.	No implications.	-	-
20. Conserve and, where appropriate, enhance the historic	Whilst none of the options presented are predicted to result in a significant effect, their relative merits can be discussed. The pursuit of Option One, and its complete redevelopment of the site, may result in the loss of those buildings at the front of the site that are not listed, but which do have townscape value. This is in contrast to Option Two, which seeks the compulsory retention of these buildings. However, it should be noted that opportunities for the maintenance of these buildings are also to be explored as an element of any development proposal coming forward through Option One.	2	★ 1

SA Objective	Discussion of <u>significant effects</u> (and discussion of <u>relative merits</u> in more general terms)	Rank of preference	
		Alt 1	Alt 2
environment			
21. Maintain and enhance the vitality and viability of the Borough's town centres	No significant effects are predicted for any of the options put forward. Nonetheless, their relative merits can be discussed. The development of the whole of the site to residential uses, as proposed through Option One, is likely to result in the creation of new homes, which may potentially support economic development in the Wood Street town centre. Meanwhile Option Two's partial redevelopment of the site may also contribute towards housing growth, but to a lesser extent. This is due to the less efficient use of land and the reduction in site viability that may result from keeping the buildings at the front of the site in place. As such, it is considered less preferable in terms of supporting the town centre.	★ 1	2
22. Improve the local economy by attracting inward investment	No implications.	-	-
23. Maintain stable levels of employment in the Borough	No significant effects are predicted for any of the options put forward. Nonetheless, their relative merits can be discussed. The Lucerne site is located within an area considered to suffer from a high level of employment deprivation. The development of the whole of the site to residential uses, as proposed through Option One, is likely to result in the creation of new homes, which may potentially support local economic development and job creation. Option Two's partial redevelopment of the site may also contribute towards housing growth and associated employment gains, but to a lesser extent. This is due to the less efficient use of land and the reduction in site viability that may result from keeping the buildings at the front of the site in place.	★ 1	2
<p>Summary</p> <p>Of the two approaches presented, Option One is <u>most likely to result in gains</u> when considering all SA objectives. This is due to the improved site viability and efficient use of land that may result from having the option to develop the entirety of the site. The larger scope for redevelopment this option offers may contribute to a greater degree towards meeting local housing need (though efficient usage of land), to reducing crime (through better design), and towards reducing deprivation, increasing employment and supporting the town centre (as a result of housing growth).</p> <p>Option Two meanwhile is likely to achieve these benefits to a lesser extent. The buildings at the front of the site do however have townscape value. Their loss could have an impact on the wider historic environment of Wood Street, and so Option Two's protective approach is beneficial in this respect. However, it should be noted that opportunities for the maintenance of these buildings are to also be explored as an element of any development proposal coming forward through Option One.</p>			

