**London Borough of Waltham Forest**

**Local Plan Part 1**

**Sustainability Appraisal Post - Adoption Statement, February 2024**

Waltham Forest

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## Purpose of this document

This Sustainability Appraisal Adoption Statement responds to the adoption of the Waltham Forest Local Plan (Part 1) on 29th February 2024, in order to satisfy the post adoption (Stage E) requirements for Sustainability Appraisals (SA)/ Strategic Environmental Assessments (SEA) in accordance with Directive 2001/42/EC. As such, it summarises:

- how environmental considerations have been integrated into the Plan;
- how the Sustainability Appraisal report and opinions expressed through public and other consultations have been taken into account;
- the reasons for adopting the Plan in the light of other reasonable alternatives;
- the measures proposed for monitoring the Plan.

# 1. Introduction and context

1.1. According to national guidance, a Sustainability Appraisal (SA) is, 'a systematic process that must be carried out during the preparation of local plans and spatial development strategies', with the purpose of promoting sustainable development by, 'assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives'.

1.2. The Planning and Compulsory Purchase Act requires local authorities to carry out an SA during the plan preparation stage, with the objective of contributing to the achievement of sustainable development. This is reiterated in the National Planning Policy Framework (NPPF).

> "Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered)." (Paragraph 32, NPPF, December 2023)

1.3. Carrying out a SA is a therefore a means of determining the most important environmental, social and economic factors in relation to an area, and testing the emerging spatial strategy and planning policy document against them. The aim is to assess the emerging plan, test it against reasonable alternatives, seek ways in which it might be improved and embed any mitigation measures required.

1.4. The SA process is intended to be iterative, as it informs plan production over time at different stages. Therefore, whilst there is a common framework for the SA process (see figure 1), this is applied in a responsive manner as specific plans are produced. This post adoption statement describes how it was applied in relation to the Waltham Forest Local Plan (Part 1).

1.5. Strategic Environmental Assessments (SEAs) are incorporated into the requirement for completing SAs.

**The Waltham Forest Local Plan (2024) SA**

1.6. The Waltham Forest Local Plan (Part 1) was adopted on 29 February 2024. It has been subject to a continuous SA and SEA process throughout plan preparation. The Council has also updated the Habitats Regulations Assessment (HRA) alongside the SA..

1.7. Full details of the approach taken are set out in Sections 2 and 3 of this statement. In summary, Stage A (setting the context and objectives, establishing the baseline and deciding on the scope of the SA) was initially undertaken in September 2017 with SA Scoping for the draft Local Plan. This was then updated between January and August 2020. Stage A included identifying other relevant policies, plans and programmes, identifying sustainability objectives, issues and problems, collecting baseline information, developing a SA Assessment framework and consulting on the scope of the SA.

1.8. Stage B (developing and refining alternatives and assessing effects) was initially carried out in relation to initial Direction of Travel consultation in 2017, and then further developed alongside Stage C (preparing the SA report) during the preparation of the preferred submission version of the Plan for Regulation 19 consultation. In terms of Stage D (seeking representations on the SA from consultation bodies and the public), a Draft Local Plan Sustainability Appraisal was consulted on with the statutory consultees from 9th October until 20th November 2019 to confirm that it provided sufficient information to ensure that a robust and legally compliant SA was carried out. Other interested parties were also notified and the document was available on the Council's website at that time. This Stage continued when the preferred submission version of the Plan was published for Regulation 19 consultation in November 2020. The Plan, with supporting SA, were submitted for independent Examination in Public (EiP) in April 2021. Following Stage 1 of the EiP, the Council prepared further evidence in summer 2022, and at the Inspectors' request, an updated Sustainability Appraisal was carried out and consulted on in September 2022 prior to the Stage 2 EiP hearings held in March 2023. A post hearings Main Modifications Sustainability Appraisal was also carried out and published for consultation in July 2023.

1.9. All of the relevant documents can be found at the Council's website in association with the various stages of plan preparation and examination.

**The Development Plan and the Waltham Forest Local Plan**

1.10. The Waltham Forest Local Plan (Part 1) sets out a spatial vision, strategic objectives and a planning policy framework for development in the borough until 2035. It positively plans for inclusive and sustainable growth, including infrastructure requirements, to proactively meet the needs of the borough's communities and will be used to determine all planning applications submitted to the Council.

1.11. The Plan goes as far as possible to meet the number of new homes that local evidence shows the borough needs, whilst also securing high quality exemplar design, protecting and enhancing the character of local areas, providing new and improved green spaces and public realm for all residents, responding to the climate emergency, improving air quality, significantly reducing surface water flood risk, creating safer spaces, reducing fear of crime, maximising the number of local jobs and employment space, and delivering a whole range of community infrastructure, including health facilities, a new hospital, public transport/station improvements, facilities for young people and new cultural amenities.

1.12.    The broad policy framework set out in the Local Plan is structured around the themes of:

- Decent Homes for Everyone
- Building a Resilient and Creative Economy
- Promoting Culture and Creativity
- Distinctive Town Centres and High Streets
- Social and Community Infrastructure
- Promoting Health and Well-being
- Creating High Quality Places
- Active Travel, Transport & Digital Infrastructure
- Conserving and Enhancing our Heritage
- Protecting and Enhancing the Environment
- Addressing the Climate Emergency
- Promoting Sustainable Waste Management

1.13.    The Waltham Forest Local Plan has been prepared within the context of a hierarchical framework of planning legislation and policy for England. At the top of the hierarchy is a number of planning related Acts of Parliament and Statutory Instruments. The NPPF (2023) sets out Government's planning policies for England and how these should be applied, alongside Planning Practice Guidance (PPG). Local authorities must take the NPPF into account when preparing local plans.

1.14.    Below national policy sits the London Plan (2021), which is prepared by the Mayor of London. The Greater London Authority Act 1999 requires the Local Plan to be in 'general conformity' with the London Plan. This means that the Local Plan should be in line with the London Plan, unless there is local evidence and circumstances that would justify a different approach. The London Plan forms part of the development plan for the borough and provides the spatial development strategy for Greater London.

1.15.    The new Waltham Forest Local Plan (Part 1) will replace the existing Core Strategy (2012), the Development Management Policies (2013), the Walthamstow Town Centre Area Action Plan (2014) and the Blackhorse Lane Area Action Plan (2015). These documents are available to view on the Council's website.

1.16.    The Waltham Forest Local Plan SA focuses on the Local Plan in itself. It does not appraise the wider Development Plan as the London Plan has been the subject of a separate SA.

1.17.    The Waltham Forest Local Plan (Part 1) does not include Site Allocations - these will be set out in the emerging Local Plan Part 2, which is at an earlier stage of preparation. A first draft (Regulation 18) of Local Plan 2 was consulted on between September 2020 and December 2020 and a submission version (Regulation 19) was consulted on between November 2021 and January 2022.  A further Regulation 19 consultation is proposed for later in 2024, prior to submission to the Secretary of State for EiP. This further review and consultation gives the Council the opportunity to ensure that Local Plan Part 2 aligns with Local Plan Part 1 as adopted, and fully reflects the latest evidence documents, including masterplans and Area Frameworks. All responses received to both rounds of Regulation 19 consultation will be submitted to the Secretary of State.

1.18.    Local Plan Part 2 is subject to an ongoing parallel SA process that builds on all the work done for the Local Plan Part 1 SA, particularly through scoping, the identification of key issues, the establishment of the SA framework, the consideration of reasonable alternatives.

**Habitats Regulations Assessment (HRA):**

1.19.    In the UK, the Habitats Directive (92/43/EEC) has been transposed into domestic legislation as the Habitats Regulations (2017), which requires an assessment of any plans which are likely to have a significant effect on any protected European sites, i.e. Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar wetland sites. This is commonly referred to as a Habitats Regulations Assessment (HRA). This is a requirement for strategic plans with an impact on land use.

1.20.    HRA screening was undertaken of the Direction of Travel document and published within the accompanying SA report for the Regulation 18 draft of the new Waltham Forest Local Plan. The screening identified a number of 'likely significant effects' on Epping Forest SAC, Lee Valley SPA and the Lee Valley Ramsar site, which requires further investigation through Appropriate Assessment. Screening identified that the Appropriate Assessment needed to consider the following:

- Recreational pressure;
- Air pollution;
- Urbanisation;
- Water pollution;
- Hydrological changes;
- Invasive species; and
- Spread of diseases.

1.21.    A HRA of the new Waltham Forest Local Plan (Part 1) was subsequently prepared in 2019 / 2020. Emerging Local Plan policies were rescreened in September 2020 and April 2021. Following Stage 1 of the EiP, an updated Habitats Regulations Assessment Report was produced to reflect updated evidence and ongoing collaboration with statutory bodies including Natural England. This was able to conclude that there will be no adverse effects on European sites in relation to water demand, water pollution, air quality, recreational pressure and urbanisation effects both alone and in combination with growth in neighbouring areas.

# 2. Background to the Sustainability Appraisal (SA) Process for Waltham Forest Local Plan (Part 1)

2.1.  SA of Local Plans is required under Section 19 of the Planning and Compulsory Purchase Act 2004. The National Planning Policy Framework (February 2019) also requires SA of Local Plans.

2.2.  Promoting sustainable development is at the heart of the NPPF, which states that 'the purpose of the planning system is to contribute to the achievement of sustainable development' (para. 7). Therefore, the planning system must work towards providing economic, social and environmental gains through guiding development.

2.3.  The Planning Practice Guidance (PPG) states that SA is, 'a systematic process that must be carried out during the preparation [of a Local Plan]. Its role is to promote sustainable development by assessing the extent to which the emerging plan … will help to achieve relevant environmental, economic and social objectives'. The process ensures that the 'proposals in the plan are appropriate given the reasonable alternatives' and supplies the justification and reasoning behind the preferred options carried forward in the Local Plan.

2.4.  SA assesses the significant environmental, social and economic effects of a Local Plan, any 'reasonable' alternatives to the Plan's strategy, policies and proposals, and the reasons for discounting those alternatives. It also incorporates a process called Strategic Environmental Assessment (SEA).

2.5.  SEA in England is mandated by the SEA Directive (Directive 2001/42/EC: Assessment of the Effects of Certain Plans and Programmes on the Environment) and is regulated by the Environmental Assessment of Plans and Programmes Regulations 2004 Statutory Instrument No.1633 ('the SEA Regulations'). The SEA Directive aims at a high level of protection of the environment, and to integrate the consideration of the environment into the preparation and adoption of plans and with a view to promoting sustainable development.

2.6.  It is accepted practice in England to integrate the requirements of SA and SEA into a single assessment process, as set out in the PPG.

2.7.  The five stages of the SA process are set out in Figure 1. This Post Adoption Statement fulfils the relevant Stage E requirement.

**How the SA Process has been applied in preparation of the new Waltham Forest Local Plan (Part 1)**

2.8. The Waltham Forest Local Plan (Part 1) SA has been prepared at various points throughout the plan preparation process through collaboration between Clearlead Consulting and Officers, and in-house by Officers within the Waltham Forest Place and Design team. With each taking a lead at different stages during the plan-preparation and examination processes, any issues raised during the SA process have been addressed at the earliest opportunity.

**Stage A**

2.9. A SA Scoping Report was consulted on with statutory consultees between 24th July and 29th August 2017 (a period of 5 weeks). In the SA Scoping Report, the topics set out within the SEA Regulations were expanded into a number of sustainability topics, as presented within Table 1, to include socio-economic topics as well as environmental.

2.10. The Scoping Report presented baseline information on the environmental, social and economic characteristics of the plan area, including the likely evolution of the baseline within the plan period. The Scoping Report set out a framework (called the 'SA Framework') for the assessment of the plan and its alternatives, identifying the significant effects that the assessment will need to focus on. The Scoping Report was amended following consultation and published again in September 2017 as a post-consultation version. The final version of the SA Framework Objectives is shown in Table 2 below.

| SA Topics | SEA Directive Topics |
|---|---|
| Population Landscape | Population |
| Human Health | Human Health |
| Economy | (not required by SEA Regulations) |
| Employment and Skills | (not required by SEA Regulations) |
| Transport | Material assets |
| Crime and Safety | Human Health |
| Housing | Material assets |
| Townscape and Heritage | Cultural heritage, including architectural and archaeological heritage<br>Material assets |
| Climate | Climatic factors |
| Air Quality | Air |
| Soil and Geology | Soil |
| Water | Water |
| Biodiversity | Biodiversity, fauna, flora |
| Landscape | Landscape |
| Waste | (not required by SEA Regulations) |

**Table 1:** SA Topics compared with SEA topics

| SA Objective | Description | Sustainability Issues |
|---|---|---|
| SA1 | Meet local housing needs through the provision of a range of tenures and sizes of new dwellings | • As the population continues to increase so does the demand for housing, infrastructure and facilities<br>• The population density within the Borough exceeds both the London and the national averages<br>• There is a need to create high quality places to live, work and recreate that are mixed and well-balanced in terms of tenure and income<br>• Promote high quality housing with a range of tenures to reduce health issues which arise from poor quality accommodation<br>• 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<br>• There is a shortfall in the provision of affordable housing to meet the requirements of those in housing need<br>• There is a potential shortfall in the provision of family accommodation and there is overcrowding, primarily in the private rental sector<br>• Homelessness is expected to increase<br>• Need to offer greater quality, flexibility and choice to those who rent.<br>• There is a need to increase the supply of well-designed housing of all tenures<br>• Need to introduce more flexible approaches for affordable housing contributions to encourage open market and mixed tenure specialist older people's housing. |
| SA2 | Reduce crime and the fear of crime | • Increases in racist and religious hate crimes<br>• The percentage of residents that are worried about crime in the Borough remains higher than the London average<br>• Need to provide safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life<br>• Need to develop an approach to tackling crime, improving liveability and reducing anti-social behaviour. |
| SA3 | Improve standard of health and wellbeing of those who live and work in the Borough | • Currently a large proportion of the population are aged over 50 and this is projected to rise over the next 20 years (+26% rise by 2021)<br>• Improve life expectancies through promoting healthy lifestyles for all ages<br>• Need to ensure adequate access to green spaces and recreational facilities to promote active and healthy lifestyles Need to increase recognition of the |

| | | growing evidence of a relationship between physical and mental health |
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| | | • Need to ensure that hospitals have fit for purpose facilities (i.e. less converted houses) that meet the needs of patients |
| | | • Need to increase levels of active travel throughout the Borough in order to increase physical activity levels and tackle poor air quality. |
| | | • Childhood obesity rates are higher within Waltham Forest than both regionally and nationally |
| | | • TB remains a disease which is of high prevalence within the Borough |
| | | • There is a need to protect open space of varying types, which is used |
| SA4 | Improve community cohesion and reduce inequalities through the provision of community facilities to meet local cultural, educational, recreational and social needs | • There are inequalities in health and life expectancy between ethnic groups |
| | | • Disparities between wards, particularly between the north and south of the Borough |
| | | • Need to provide inclusive services; promote equal opportunities; oppose discrimination, intolerance and disadvantage through reducing inequalities and promoting community cohesion |
| | | • Help to support development of successful neighbourhood |
| | | • There is a need to create high quality places to live, work and recreate that are mixed and well-balanced in terms of tenure and income |
| | | • Adequate support and facilities for older residents, including independent living, has been noted in particular to be needed |
| | | • Need to build on Borough's arts, culture and sport strengths across the Borough's diverse and changing population. |
| | | • Need to reduce the number of older people who feel socially isolated, by getting them actively participating in community life |
| | | • Currently a large proportion of the population are aged over 50 and this is projected to rise over the next 20 years (+26% rise by 2021) |
| | | • Need to ensure that growth supports the delivery of vital infrastructure and new facilities across the Borough |
| | | • Help to support development of successful neighbourhoods |
| | | • Need to ensure that all residents have access to training and skills development to enable them to access and progress into high quality employment. |
| SA5 | Improve opportunities for access to local services, facilities and | • Continual growth in car ownership will contribute to further air pollution, and associated impacts on climate, human health and biodiversity |

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| | employment through an integrated sustainable transport system, reducing car use for all journey lengths | • Need to work towards improving air quality and reducing noise impacts from transport<br>• There is a need to make public transport more accessible in some areas of the Borough<br>• There is a need to promote walking and cycling (building on Enjoy Waltham Forest ("Mini Holland") programmes) for local journeys in place of travel by private car. There should also be a focus on promoting public transport use instead of cars for medium and longer journeys<br>• There is a need to reduce car parking spaces in order to discourage private car use and improve air quality<br>• One in five journeys each weekday morning and afternoon involves trips to school, even though most journeys to schools are under a mile. There is a need to reduce school journeys by reducing Drop Off/Pick Up arrangements for new school developments, and encouraging sustainable, active travel amongst school pupils<br>• As the population grows, so does the need to change current infrastructure to meet the demands of all residents whilst making it future proof<br>• Need to ensure that growth supports the delivery of vital infrastructure and new facilities across the Borough<br>• Need to provide public transport capacity and safeguard land for transport<br>• Help to enhance London's transport connectivity<br>• Improvements to road safety are needed to reduce casualties<br>• Need to make cycle parking safe and easy to use<br>• There is a need to provide electric vehicle infrastructure, such as charging points |
| SA6 | Prevent production of waste, improve resource efficiency and increase recycling and recovery | • The amount of waste produced is reducing but still exceeds both the London and national average<br>• The London Plan encourages greater self-sufficiency for waste management in London and sustainable transportation of waste.<br>• Recycling is increasing but still falls short of government targets Need to ensure that growth supports the delivery of vital infrastructure and new facilities across the Borough<br>• Need to minimise the impact of municipal waste management on the Borough's environment<br>• Need to reduce the carbon footprint of municipal waste<br>• Need to ensure that all waste is managed in the most environmentally friendly way |
| SA7 | Reduce greenhouse gas emissions and | • Greenhouse gas emissions need to be stabilised and reduced over time<br>• Help promote low carbon heat network |

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| | promote low carbon growth | • Need to identify opportunities for growth of the low carbon economy in the Upper Lee Valley<br>• There is a need to provide electric vehicle infrastructure, such as charging points. |
| SA8 | Conserve energy | • There is a need to continue to promote the construction of energy efficient buildings, and to support the installation of renewable and low or zero carbon technology. |
| SA9 | Improve air quality | • Continual growth in car ownership will contribute further air pollution<br>• Reliance on the petrol or diesel-fuelled private car as the main mode of transport<br>• Air pollution from the strategic road network is an issue across the Borough and NO2 emissions are remaining constant, not decreasing as predicted<br>• Increasing use of biofuels (biodiesel and biomass) for heating schemes will cause further air quality issues<br>• Need to help reduce pollution from road vehicles, buildings, industry and construction<br>• Need to improve efficacy of measures within the AQMA<br>• There is a need to provide electric vehicle infrastructure, such as charging points. |
| SA10 | Improve water quality in rivers and groundwater and ensure the efficient use of water resources | • High number of properties risk of flooding and there is a need to promote flood resistance and resilience measures for existing and future properties to ensure they are resilient to the future effect of climate change and protected against future flood risk. In response to this risk proposals have been developed for Critical Drainage Areas<br>• Natural flood management techniques should be promoted<br>• New development will need to incorporate SUDS to sustainably reduce flood risk<br>• Need to promote the use of new technologies and innovation in flood mitigation measures<br>• There will be an increasing need to plan for and implement/facilitate climate change adaptation, in respect of rising temperatures, water scarcity and extreme weather events, particularly heavy rainfall/flooding<br>• There is a need to plan and prepare for the expected impacts of unavoidable climate change by developing adaptation responses and building resilience<br>• New developments need to minimise vulnerability and provide resilience to climate change<br>• There is a need to work with communities to help tackle climate change |
| SA11 | Reduce the risk of flooding and improve | • High number of properties risk of flooding and there is a need to promote flood resistance and resilience |

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| | resilience to climate change | measures for existing and future properties to ensure they are resilient to the future effect of climate change and protected against future flood risk. In response to this risk proposals have been developed for Critical Drainage Areas<br>• Natural flood management techniques should be promoted<br>• New development will need to incorporate SUDS to sustainably reduce flood risk<br>• Need to promote the use of new technologies and innovation in flood mitigation measures<br>• There will be an increasing need to plan for and implement/facilitate climate change adaptation, in respect of rising temperatures, water scarcity and extreme weather events, particularly heavy rainfall/flooding<br>• There is a need to plan and prepare for the expected impacts of unavoidable climate change by developing adaptation responses and building resilience<br>• New developments need to minimise vulnerability and provide resilience to climate change<br>• There is a need to work with communities to help tackle climate change. |
| SA12 | Ensure the efficient use of land and buildings and protect soil quality and geological resources | • There is finite availability of previously developed land for development; this may result in the use of greenfield land in the future<br>• There is a need to protect soils and the important ecosystem services they provide – particularly during construction and development<br>• Need to protect designated geological sites. |
| SA13 | Conserve and enhance biodiversity and the natural environment, improving resilience to climate change | • Support is needed to achieve local BAP targets<br>• Need to promote effective land-management to support, protect and enhance biodiversity<br>• Increases in population will cause a demand for more development, where there is a potential for loss of valuable habitats which have yet to be designated for nature conservation as a direct result<br>• Consider and plan for the impacts of climate change on species and habitats<br>• There is a need to help encourage people to engage with the ownership, design, management, maintenance and use of their environment as part of their own vision for their neighbourhood<br>• Need to recognise the wider benefits of ecosystem services and manage impacts on biodiversity<br>• Increase awareness that green infrastructure and resilient ecological networks play an important role in aiding climate change adaptation and resilience<br>• Seek to enhance green infrastructure networks within the Borough |

| | | • Ensure current ecological networks are not compromised, and future improvements in habitat connectivity are not prejudiced |
| --- | --- | --- |
| | | • In line with NPPF, new development should achieve biodiversity net-gain in a hierarchical approach with on-site net-gain being preferred and off-site compensation as a last resort Need to work to conserve and enhance the local environment. |
| SA14 | Protect the ecological integrity of SSSI and Natura 2000 sites | • Large areas of the SSSI sites are considered to be in either<br>• unfavourable with no change or to be in an unfavourable and<br>• declining condition<br>• SSSIs and European sites within the Borough are under threat from poor air quality, recreational pressure and urban effects (including issues with litter)<br>• Need to protect and enhance the wildlife and habitats in Waltham Forest, in particular those of international, national and regional importance. |
| SA15 | Maintain and enhance the quality of the green belt and open space areas | • Large areas of open space are Metropolitan Green Belt. There is a need to protect these areas of open space from development pressure.<br>• There is a need to protect open space of varying types, which is used heavily by residents of the Borough. For example, allotment space. |
| SA16 | Maintain and improve local distinctiveness | • Need to establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit<br>• Need to work towards conserving local character and history, by reflecting the identity of local surroundings and materials. This should not prevent or discourage appropriate innovation. |
| SA17 | Conserve and enhance the historic built environment | • A number of listed buildings are identified as being in poor condition and are have been included on Historic England's Heritage at Risk Register. Opportunities exist to improve the condition of some listed buildings through development<br>• The Borough contains 20 Archaeological Priority Areas where there is significant known archaeological interest or potential for new discoveries<br>• Ensure that the Conservation Areas, Heritage Assets and features are preserved or enhanced<br>• New developments should respect the urban and historic context, improve townscape and leave a positive architectural legacy<br>• Impacts of future development on the local historic environment need to be considered<br>• Heritage assets should be managed to sustain their significance |

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| | | • Ensure that everyone is able to participate in understanding and sustaining their local historic environment<br>• Development could encroach on Conservation Areas and subsequently negatively affect townscape and heritage assets | |
| SA18 | Maintain and enhance the vitality and viability of the Borough's town centres | • Further action is needed in order to support and promote retail, business, cultural, leisure and residential investment in town centres.<br>• Support is required for the creation of the Creative Enterprise Zone around Blackhorse Lane. | |
| SA19 | Improve the local economy by enabling employment developments in appropriate places | • Lower than average salaries could affect the Borough's ability to attract inward investment<br>• Continue to support the Upper Lee Valley Development Opportunity Area and celebrate its industrial heritage<br>• There are likely to be ongoing pressures on industrial sites, need to maintain industrial uses and promote strong local base of small businesses<br>• Need to provide additional workspaces and promote denser, mixed use development with no net loss of business floor space. | |
| SA20 | Maintain stable levels of employment in the Borough | • Skills development in growth areas is also needed both for those who are currently unemployed or underemployed<br>• Encourage and promote flexible working arrangements for residents to support people when gaining skills and moving into employment<br>• Investment is needed so that local people have the skills and ability to seize local growth opportunities and they are able to access and progress into high-quality, better paid employment in the Borough<br>• There are large inequalities in employment and skill levels. between wards within the Borough. Need to ensure that regeneration is inclusive<br>• Ensure that ongoing business growth becomes a driver of productivity and fairer wages (e.g. encouraging the London Living Wage), in order to create an increase in the overall prosperity of the Waltham Forest Borough<br>• There is a need to create fair employment and good work for all<br>• In work support is needed to ensure sustainment of jobs, professional development and progression into better paid, secure higher quality jobs<br>• Need to promote employment, training programmes and sector-based initiatives in the growth of skills to support creative and digital industries, construction and facilities management, retail and hospitality, and finance and business services. | |

**Table 2:** SA Framework Objectives

**Stage B**

2.11.    The Council then consulted publicly on a new Local Plan 'Direction of Travel' document in November – December 2017. The Direction of Travel document was the first stage in the engagement process with residents, businesses and other stakeholders on what the new Local Plan should contain. The Direction of Travel document presented options for consultation, comprising six spatial strategy options (strategic growth options) for development in the Borough and a number of policy direction options, which were considered under the ten topics set out in Table 3. These options were subject to a SA and Habitats Regulations (HRA) screening exercise.

| Strategic Growth Option | Policy Direction Options |
|---|---|
| Option 1: Developer Led | Decent Homes for Everyone |
| Option 2: Key Growth Areas | Building a Resilient Economy |
| Option 3: Growth Hubs | Providing Physical Infrastructure |
| Option 4: Town Centres | Meeting Social and Community Infrastructure Needs |
| Option 5: Combined Approach | Distinctive Town Centres and High Streets |
| Option 6: Exceptional Circumstances | Growing Our Culture and Visitor Attractions |
| | Creating High Quality Places |
| | Enhancing and Preserving our Heritage |
| | Protecting and Enhancing our Environment |
| | Ensuring Climate Change Resilience |

**Table 3:** Direction of Travel Options Appraised

2.12.    A range of different options for addressing each topic were presented within the Direction of Travel document and each option was assessed against the SA Framework established during Stage A.

2.13.    A Growth Capacity Study was completed in June 2018 which identified a range of potential development sites and their capacities for development across the borough. This work was used to identify 16 clusters of development sites which have been called 'Growth Areas', 'Hubs', 'Areas of Opportunities' and 'Future Potential Sites', and evolved into the 'Strategic Locations' in the adopted Plan. Together, these clusters formed a New Spatial Strategy based on the 'Combined Approach' (Option 5 in Table 3).

2.14.    This represented one of two reasonable alternative spatial strategy options selected and and assessed in September 2018. The reasonable alternatives were:
1.    A new strategy to deliver 27,000 new homes in response to identified housing need; and
2.    the option of continuing the existing spatial strategy set out in the adopted Core Strategy.

2.15.    Both underwent a SA, with each option assessed against the SA Framework (table 2).

2.16.    Two reasonable alternative spatial strategy options (the new strategy and the option of continuing with the existing spatial strategy) were originally assessed in the SA report dated October 2020, and then updated in April 2021 to be submitted in support of the preferred submission version of the Plan. At the time, when considered alongside the appraisal of the Direction of Travel consultation document (November 2017), it was considered that this fulfilled the requirements to identify, describe and evaluate the likely significant effects on the

environment of "reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme".

**Stage C**

2.17.    This stage of the SA process involves identifying any significant environmental effects of the Local Plan including short, medium and long term; permanent and temporary; positive and negative effects and documenting the SA process and presenting the findings within an SA Report. All Local Plan policies proposed in the Preferred Submission version of the Waltham Forest Local Plan were assessed against the SA Framework and reference was been made to the baseline data and key sustainability issues identified during the scoping stage. Significance criteria were used to determine the potential sustainability performance of the policies. This assessment was iterative in order to inform the emerging Plan. In September 2020 all sections of the Plan, as prepared at the time, were assessed and the findings provided in Appendix C and Section 7 of the submitted [Sustainability Report](#) (dated April 2021).

2.18.    A detailed assessment of the draft LP1 policies was carried out in Summer/Autumn 2019 and presented in the previous SA report to support the Regulation 18 consultation (October 2019). At this stage mitigation measures were suggested to address the identified potentially significant or uncertain effects and this mitigation informed the drafting of the Regulation 19 Proposed Submission LP1 policies. The SA report was then updated and published as a Regulation 19 LP1 SA Report in October 2020 and updated in April 2021 in support of submission for EiP.

2.19.    After the first EiP Hearing session in March 2022, the Inspectors requested that the Council undertake further Sustainability Appraisal work to assess reasonable alternatives, including the 10-year target for net completions in Waltham Forest set out in Table 4.1 of the London Plan (2021). This work was undertaken and the results presented in the [Sustainability Appraisal Report Examination Addendum](#) (dated 27th September 2022). This was made available for public consultation from 5th December 2022 to 23rd January 2023. A Stage 2 EiP Hearing Session was then held in March 2023, at which the outcomes of this further SA work was explored in detail.

**Stage D**

2.20.    Regulation 19 public consultation on the preferred submission version of the plan was carried out from November to December 2020. Following this, an assessment of the significant changes arising was made and the Plan and SA were submitted for examination in April 2021, along with an initial schedule of potential modifications. The Council specifically requested that the Inspectors recommend any main modifications necessary to enable the Plan to be adopted.

2.21.    Throughout EiP, the SA and SA Addendum described above and representations received in response to consultations were considered in detail.

2.22.    A SA of the proposed Main Modifications was carried out and published in the [Post Hearings Sustainability Report](#) (dated July 2023) as part of the Main Modifications consultation that ran from July to September 2023. All responses to this consultation were sent to the Inspectors and published on the Council's website. In response, the Inspectors amended some detailed wording of Main Modifications and recommended their inclusion in the Plan after considering the SA, HRA and all representations made in response to the consultation.

2.23. Through this process, requirements to subject the Waltham Forest Local Plan to a SA and SEA have been met, and it is clear how the SA influenced the final plan, including mitigation measures (see Section 3 of this report for further detail).
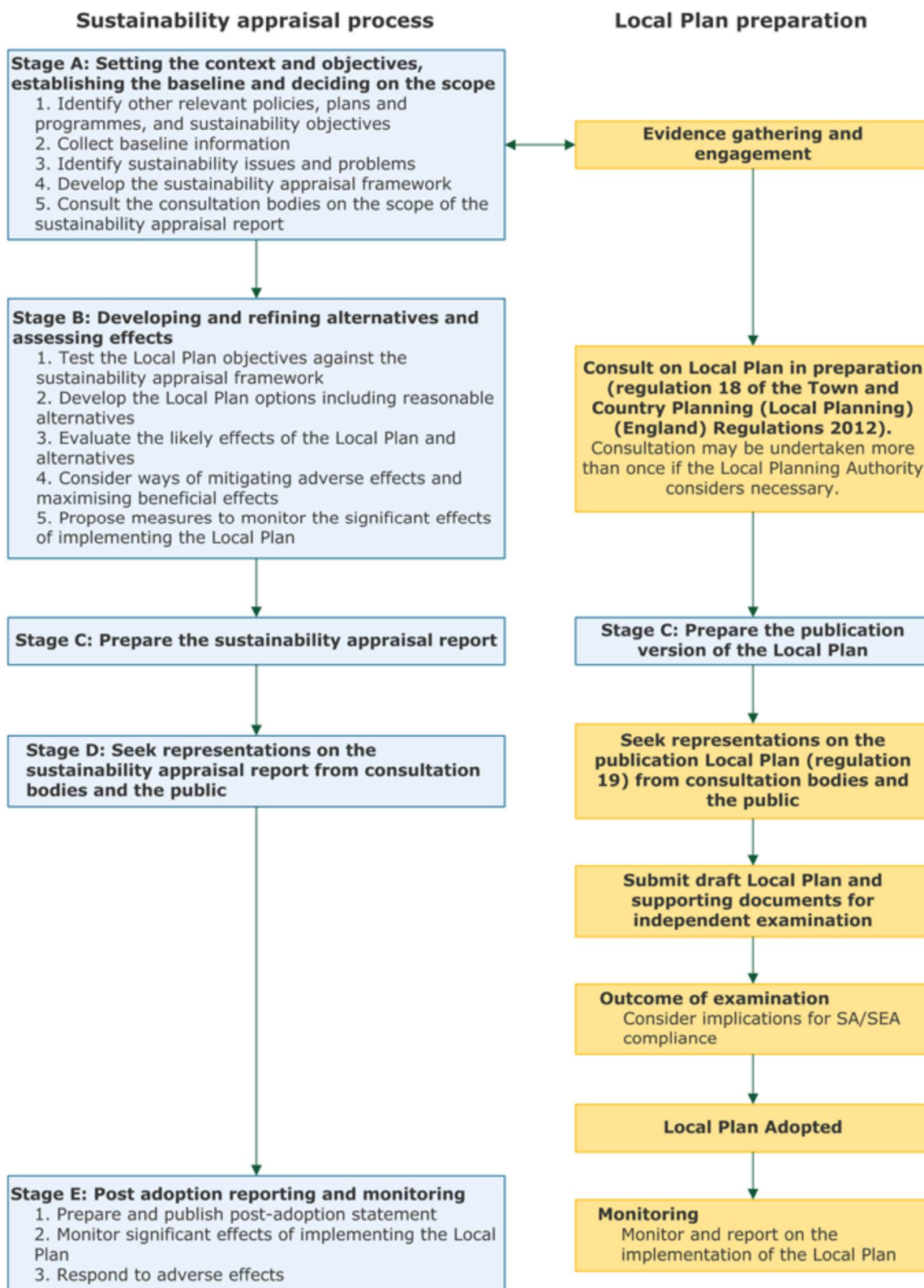
## Sustainability appraisal process

**Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope**
1. Identify other relevant policies, plans and programmes, and sustainability objectives
2. Collect baseline information
3. Identify sustainability issues and problems
4. Develop the sustainability appraisal framework
5. Consult the consultation bodies on the scope of the sustainability appraisal report

**Stage B: Developing and refining alternatives and assessing effects**
1. Test the Local Plan objectives against the sustainability appraisal framework
2. Develop the Local Plan options including reasonable alternatives
3. Evaluate the likely effects of the Local Plan and alternatives
4. Consider ways of mitigating adverse effects and maximising beneficial effects
5. Propose measures to monitor the significant effects of implementing the Local Plan

**Stage C: Prepare the sustainability appraisal report**

**Stage D: Seek representations on the sustainability appraisal report from consultation bodies and the public**

**Stage E: Post adoption reporting and monitoring**
1. Prepare and publish post-adoption statement
2. Monitor significant effects of implementing the Local Plan
3. Respond to adverse effects

## Local Plan preparation

**Evidence gathering and engagement**

**Consult on Local Plan in preparation (regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012).**
Consultation may be undertaken more than once if the Local Planning Authority considers necessary.

**Stage C: Prepare the publication version of the Local Plan**

**Seek representations on the publication Local Plan (regulation 19) from consultation bodies and the public**

**Submit draft Local Plan and supporting documents for independent examination**

**Outcome of examination**
Consider implications for SA/SEA compliance

**Local Plan Adopted**

**Monitoring**
Monitor and report on the implementation of the Local Plan

**Figure 1:** The SA Process

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# 3. Integrating Sustainability Considerations into the Waltham Forest Local Plan (Part 1)

3.1. Environmental and wider sustainability concerns have been integral to the key decisions made in respect of the spatial strategy and planning policies of the Waltham Forest Local Plan (Part 1) since initial issues and options were considered in 2017. The integration of these considerations into the adopted plan through the plan-making process has principally been achieved through:

- Clear and detailed understanding of the local context within which the plan was prepared, including the Council's wider goals and strategic ambitions for the borough expressed through key documents such as Corporate Strategies and Climate Action Plan;
- The development of a comprehensive evidence base, all of which informs national and regional requirements to integrate environmental, social and economic considerations into the Plan;
- Iterative work to ensure environmental, economic and social considerations such as housing need, biodiversity impacts, resilience against flood risk, air quality improvements, response to climate change and improving public health and well-being are balanced appropriately;
- Continuous engagement with key stakeholders (including statutory consultees) and the wider public on the emerging Plan and related environmental and sustainability matters, including the fulfilment of the Council's Duty to Cooperate;
- The consideration of national planning policy and the objectives of other plans and programmes, including the London Plan (adopted in 2021 and subject to its own SA); and
- Ongoing assessment through SA and HRA Appropriate Assessment.

3.2. During the plan-making process, the SA has been carried out as an iterative and ongoing process to inform decision making for developing the Plan. The SA was undertaken in accordance with government guidance which encourages a staged approach that integrates appraisal to consider the effects of the emerging plan on socio-economic as well as environmental factors.

**Stage A**

3.3. The SA Scoping report contains relevant information about the borough and identifies key sustainability issues. It was informed by a review of all relevant plans and programmes. The Scoping Report was the subject of consultation with key stakeholders, adjoining boroughs and relevant Council services. The comments received informed the baseline, and the review of plans and programmes.

3.4. The Scoping Report's baseline review established a range of relevant issues for Waltham Forest, organised around recognised topics and provided baseline information on the environmental, social and economic characteristics of the borough. Twenty SA Objectives emerged (see table 2 above) from this process. These established an appropriate framework for carrying out the SA against which the effect of the Plan policies have been appraised.

3.5. The final Scoping Report took account of any new and emerging policies and programmes, changes to legislation and updated background data. The baseline and characteristics of Waltham Forest and the issues highlighted were kept under review, as they will be as the performance of the plan is monitored under Stage E.

**Stage B**

3.6. Stage B was informed by the responses received on the borough's Direction of Travel and consultation on the Regulation 18 version of the Plan and the findings of the updated evidence base. This involved:

- comparing the aims, strategies and all policies of the Local Plan with the twenty SA Objectives developed as part of the sustainability appraisal scoping; and
- appraising alternatives for emerging proposals and policies within the plan.

3.7. As set out in parts 2 and 4 of this statement, two reasonable alternative spatial strategy options selected and assessed in September 2018. The reasonable alternatives were:

1. A new strategy to deliver 27,000 new homes in response to identified housing need; and
2. the option of continuing the existing spatial strategy set out in the adopted Core Strategy.

3.8. To inform Stage 2 of the EiP, this was further supplemented by the testing of the preferred growth strategy based on an updated housing trajectory in September 2022 and the London Plan alternative scale of growth, based on housing targets of 1,264 dwellings per year over the ten-year period 2019/20 to 2028/29 and then extended to the end of the Plan Period.

**Stage C**

3.9. The SA Report, and subsequent addenda, shows the results of the assessment and the extent to which the options and alternatives for the policies and growth strategies have been appraised to help to achieve the relevant sustainability objectives. These reports were informed by responses received at various stages of Plan preparation and examination, through both public consultation and direct consultation with statutory consultees.

**Stage D**

3.10. Representations on the SA were sought throughout the Plan-making and EiP processes. This included:

- consultation on the SA Report (and Plan) during Regulation 19;
- Submission of the Plan with the SA, and the Stage 1 EiP;
- Further SA following the first stage of EiP;
- Publication of the SA Examination Addendum ahead of Stage 2 EiP;
- Udates to the SA as a result of modifications arising from the Examination; and
- Publication of the Post Hearing Main Modifications SA Report

**Examination Stage 2:**

3.11. Stage 2 of the EiP represented a critical stage in the SA of the Waltham Forest Local Plan, through which the remaining uncertainties that had previously been identified were addressed, through close collaboration with stakeholders including the GLA, Natural England, the Conservators of Epping Forest and the Environment Agency.

3.12. The SA Examination Addendum prepared and published at this time re-appraised the Plan's spatial strategy and planning policies, including reasonable alternatives, in light of additional and updated evidence prepared in response to the Inspectors' letter dated 05/05/21.

3.13. With specific reference to the SA, in their letter of 05/05/2021, having considered the SA process to date and the consultation responses received, the Inspectors requested that the Council undertake further SA work to assess reasonable alternatives, including the 10-year target for net completions in Waltham Forest set out in Table 4.1 of the London Plan.

3.14. The Inspectors also required the Council to:
- Undertake a strategic, borough-wide Sequential Flood Risk Test.
- Undertake further Sustainability Appraisal work to assess other reasonable alternatives to the Local Plan's preferred growth strategy.
- Update the Air Quality Study in accordance with Natural England's requirements and liaise with Natural England, the Conservators of Epping Forest and other organisations as necessary.
- Liaise with Natural England, the Conservators of Epping Forest and other organisations as necessary to provide further clarification of the capacity, quality and deliverability of proposed Suitable Alternative Natural Green Spaces to mitigate recreational harm on Epping Forest Special Area of Conservation.
- Update the housing trajectory in relation to completions, commitments, timescales for delivery, and evidence of consultation and to update the evidence behind the five-year housing land supply position.
- Evidence and justify the revised tall buildings policy, including the areas mapped and identified as appropriate for tall buildings.
- Formalise proposed changes to the Blackhorse Lane Strategic Industrial Location.

3.15. All of the above was taken into account in the SA Examination Addendum.

3.16. The SA addendum assessed two alternative growth scenarios:
- Option 1: The preferred growth strategy, based on an updated housing trajectory; and
- Option 2: The London Plan alternative scale of growth, based on housing targets of 1,264 dwellings per year over the ten-year period 2019/20 to2028/29 and then extended to the end of the plan period.

3.17. The SA finding showed a similar performance for both options against the majority of SA Objectives. However, the key differences were with regards to housing delivery, air quality and flood risk. By going as far as possible to meet the identified housing needs for the borough, Option 1 was predicted to result in a potential significant positive affect with regards to the housing SA Objective SA1, whereas Option 2 would not deliver the identified housing needs of the Borough and therefore a potential significant negative effect was identified.

3.18. In terms of air quality, Air Quality Study 2 – also prepared in support of EiP Stage 2 - showed that, overall Option 1 would result in a likely reduction in air pollution and traffic levels. Redevelopment of fewer sites which are currently generating high vehicular trips, could give Option 2 a less favourable air quality outcome.

3.19.    Although Option 1 would locate more new homes in areas of medium and high flood risk, the SA Addendum found that policies within the Local Plan (including "Managing Flood Risk") would mitigate and minimise potential negative effects on flood risk from development and help to improve resilience to climate change. As such, this was found to be justified by the potential significant positive effect with regards to meeting the identified housing needs of the borough (SA Objective SA1).

3.20.    In conclusion therefore, Option 1 remained the preferred policy option, as it goes as far as possible to meet the need for new homes in the borough, whilst also securing high quality design, protecting and enhancing the character of local areas, providing new and improved green spaces and public realm, responding to the climate emergency, and significantly reducing flood risk, creating safer spaces, reducing fear of crime, maximising the number of local jobs and employment space, and delivering a whole range of community infrastructure, including health facilities, a new hospital, public transport/station improvements, facilities for young people and new cultural amenities.

3.21.    The SA addendum found that, as well as falling short of meeting identified housing need, a lower housing target across the fifteen-year plan period would not provide the same opportunity or levels of investment in all of the wider benefits that the preferred spatial plan could achieve.

3.22.    It also found that the Waltham Forest Local Plan is in full alignment with the London Plan minimum housing target for eight of the ten years that the London Plan target is set for. By the point at which identified housing supply in Waltham Forest will exceed the London Plan minimum target, the London Plan will already be subject to review informed by an updated understanding of site capacity across all boroughs.

3.23.    The SA Examination Addendum also screened potential modifications to the preferred submission version of the Plan proposed at the time, and where they could make a significant difference to the SA, the assessments of policies was updated.

3.24.    The SA Addendum was informed by a Habitats Regulations Assessment (HRA) Update, which was prepared in consultation with Natural England to ensure that the findings of Air Quality Study 2, and mitigations proposed in the new Suitable Alternative Natural Greenspace (SANG) Strategy were adequately reflected in the conclusions of this work. Based on this new and updated evidence, the Appropriate Assessment was able to conclude that the Waltham Forets Local Plan, both alone and in combination, will not have an adverse effect on the integrity of the EFSAC in relation to air quality and that there will be no adverse effect on the integrity of the Epping Forest SAC arising from recreation pressure arising from planned growth in Waltham Forest.

3.25.    The EiP Stage 2 SA and HRA were supported by positive Statements of Common Ground with the Environment Agency and Natural England, and confirmation that Natural England were able to remove all their previous challenges to the Plan as a result if the work undertaken. In response to the Inspectors' subsequent Examination Stage 2 MIQs, Natural England confirmed that they "are of the opinion that the plan alone and in combination will not have an effect upon the integrity of the [Epping Forest] SAC from Air Quality" and that, in relation to recreational pressure, they "support the HRA conclusion" that "with the mitigation in place within the LP1 and the supporting SANG Strategy (to be incorporated into a Waltham Forest Green Spaces and Places SPD), it will be possible to conclude that the Waltham Forest LP1 will not result in adverse effects on the integrity of Epping Forest SAC in relation to recreational

pressures and urban effects when the Plan is assessed on its own or in combination with growth in neighbouring areas."

3.26.    The Addendum was published for public consultation 5th December 2022 to 23rd January 2023, and all responses were shared with the Planning Inspectors. This subsequently informed the Stage 2 EiP Hearing Session and agreed schedule of Main Modifications appended to the Inspectors' Final Report received by the Council on 8th January 2024.

3.27.    Main modifications were also subject to consultation from July to September 2023. Each proposed modification was assessed for its possible impact upon the outcomes determined through the SA carried out for the Regulation 19 Local Plan. The primary consideration for assessing this was whether the modification would lead a decision maker to conclude that a different outcome in terms of performance against the SA Objectives could be reached. In many cases, the modifications proposed were simply updates and clarifications, and consequential changes. In these cases, it was considered that there was no need to review the SA. There were also however, a number of proposed changes that were considered to introduce elements that would potentially lead to different conclusions, and were therefore reassessed against the twenty SA Objectives.

3.28.    The policies which required reappraisal (based on preferred submission policy numbers) were: Policy 4; Policy 9; Policy 10; Policy 11; Policy 12;  Policy 20; Policy 22; Policy 23; Policy 25; Policy 26; Policy 27; Policy 28; Policy 29; Policy 30; Policy 36; Policy 37; Policy 38; Policy 40; Policy 50; Policy 51; Policy 56; Policy 57; the new Building Heights Policy; Policy 58; Policy 62; Policy 65; Policy 67; Policy 74; Policy 79; Policy 80; Policy 81; Policy 83; Policy 84; Policy 87; Policy 90; Policy 93; and Policy 97.

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

3.30.    Following consideration of the responses received, the Planning Inspectors issued their Final Report to the Council on 8 January 2024, with a schedule of recommended Main Modifications. This included some minor amendments as a result of the earlier consultation, but these were not of a nature that required a reassessment of the SA.

**Stage E**

3.31.    This Adoption Statement responds to the Stage E requirement to prepare a post-adoption statement. It also refines the Council's aims and methods for monitoring. The requirement to responding to any adverse effects will be actioned should any arise.

3.32.    This statement has been issued as soon as reasonably practicable after the adoption of the Local Plan. This has set out the results of the consultation and SA process and the extent to which the findings of the SA have been accommodated in the adopted Local Plan.

3.33.    It also sets out how significant effects of the Plan will be monitored, in order to measure its performance against the SA Objectives and inform future policy revisions. It recognises that the

sustainability effects of implementing the Local Plan must be monitored in order to identity unforeseen adverse effects and to be able to undertake remedial action.

3.34.   Although monitoring is not required until the plan is put into effect, the consideration of monitoring and indicators has been undertaken throughout the process. The SA provides a monitoring framework that will identify sustainability effects. It is intended that they will help form the basis of the Authority's Monitoring Report (AMR) and will be monitored on a regular basis following the adoption of the Local Plan.

3.35.   The new Local Plan commits the Council to monitoring progress towards the achievement of the key targets for growth (housing, including affordable housing, employment space and retail) annually as part of the Council Authority Monitoring Report (AMR). In the event that delivery falls significantly behind that which is required to achieve the following targets, the Council will trigger a full or partial review of the plan in order to address the reason/s for under-delivery:

A.   Failure to demonstrate a 5-year housing land supply in any monitoring year with the following 2 monitoring years indicating no recovery in the position;
B.   Housing completions fall more than 15% beneath the targets in the housing trajectory over any rolling 3-year period;
C.   The delivery of employment space falls more than 20% beneath the target over any rolling 3-year period;
D.   A reduction of more than 20% in retail space in designated centres over a 3-year period;
E.   A failure to meet the visitor uplift in identified Suitable Alternative Natural Greenspaces
F.   (SANGs) necessary to accommodate the new homes delivered over a rolling three-year period, followed by an Epping Forest Condition Survey and visitor survey in the Special Area of Conservation (SAC) that demonstrates deterioration in the condition of the SAC resulting from recreational pressure; and
G.   Harm to the Epping Forest SAC arising from traffic growth, based on the number of trips to/from a development site compared with the level set out in the submitted Transport Assessment and Air Quality Study 2

3.36.   The table at Appendix One presents further monitoring indictors that will be used to review the implementation of the Plan against the scoped sustainability objectives.

# 4. The preferred strategy for Waltham Forest Local Plan (Part 1)

4.1. The SEA Regulations require that, 'an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated'.

4.2. The options set out within the Direction of Travel document were subject to a Sustainability Appraisal (SA) and Habitats Regulations (HRA) Screening exercise. The options consisted of six strategic growth options and between four and seven potential policy directions for ten policy topics. The scoping process reviewed a large amount of data about the borough and through this review, a set of key sustainability issues were identified. The issues were then organised into a set of 20 SA Objectives called the 'SA Framework', against which the Local Plan was tested as it developed.

4.3. Each of the options within the Direction of Travel document was appraised against the Objectives within the SA Framework in order to identify the potential sustainability effects associated with them. Following receipt of responses to the consultation on the Direction of Travel document and the accompanying report on the SA and HRA screening of options, two strategic options were chosen to take forward and appraise further. These were later updated and supplemented in the SA Appraisal produced at Stage 2 of the Examination at the request of the Planning Inspectors.

4.4. The 'reasonable alternatives' considered for the preferred spatial strategies and policies, both at Stage B and C and during Stage D of the SA process therefore took the form of:
- The new strategy as of 2018;
- Continuing with the existing spatial strategy in the Core Strategy;
- The preferred growth strategy, based on an updated housing trajectory (September 2022); and
- The London Plan alternative scale of growth, based on housing targets of 1,264 dwellings per year over the ten-year period 2019/20 to2028/29 and then extended to the end of the Plan Period. (September 2022)

4.5. The Sustainability Appraisal (SA) assessment at Stage 2 of EiP concluded that the updated preferred growth strategy, delivering 27,000 new homes over the Plan Period remained the preferred option. In relation to this strategy, the SA identified potential significant positive effects with regards to housing delivery against Objective SA1 (Meet local housing needs through the provision of a range of tenures and sizes of new dwellings), a potential minor positive effect with regards to air quality, against Objective SA9 (Improve air quality), and uncertain for flood risk against Objective SA11 (Reduce the risk of flooding and improve resilience to climate change). Through Policy 91, Managing Flood Risk, the Plan establishes the measures by which flood risk will be managed and mitigated, including a requirement for site Flood Risk Assessments to demonstrate that proposals will be safe from flooding and the impacts of climate change for their lifetime, including through flood-resistant design and construction and appropriate emergency planning. No potential significant negative effects are identified in relation to Option 1 in the SA. The second option, based on London Plan housing targets was not favoured because it would fail to deliver against the borough's identified housing needs, resulting in a potential significant negative effect for Objective SA1. It could perform similarly to Option 1 with regards to air quality, but based on the evidence available, there is uncertainty that it would result in the same significant reduction in trip generation (and

therefore potentially positive effects on air quality) that Air Quality Study 2 (AQS2) showed for Option 1.

4.6. Meaningful and proportionate consideration of flood risk was carried out in support of the Plan. The application of the Flood Risk management hierarchy and Strategic Flood Risk Assessment throughout the plan-making process provides sufficient evidence to support the policies and the proposed spatial and growth strategy. The exception test to be undertaken on the allocation of sites through Local Plan Part 2 will also demonstrate the sustainability merits of each allocation within Flood Zones 2 and 3.

4.7. In conclusion, preferred growth strategy remained the preferred policy option, as it goes as far as possible to meet the identified need for new homes in the borough, whilst also securing high quality design, protecting and enhancing the character of local areas, providing new and improved green spaces and public realm, responding to the climate emergency, including improving air quality and significantly reducing flood risk, as well as creating safer spaces, reducing fear of crime, maximising the number of local jobs and employment space, and delivering a whole range of community infrastructure, including health facilities, a new hospital, public transport/station improvements, facilities for young people and new cultural amenities.

4.8. It is considered that the Waltham Forest Local Plan SA has fulfilled the requirements to identify, describe and evaluate the likely significant effects on the environment of "reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme" and set out clearly why the preferred option has been adopted.

4.9. The options and alternatives for the policies to be included in the draft Local Plan were assessed against the SA Objectives, and revised accordingly as new and updated evidence emerged. The SA results in an informed spatial strategy and planning policies, with mitigations and appropriate monitoring embedded as necessary.

4.10. Within each iteration of the SA, it identified a range of broadly positive effects that the Vision and Objectives, policies, Area Strategies and Site Allocations had on economic, social and environmental factors. These consistently performed more favourably than the alternatives. As the plan has progressed, and the evidence and collaboration with partners developed, the policies have become gradually more certain and the outputs from the SA better targeted.

4.11. The SA recognises where there are challenges in delivering all of the Plan's objectives. It does not aim to ensure that all outputs are positive, only that possible tensions are identified and appropriate mitigations are in place. As the Plan and the SA have been developed and tested through EiP, and modifications have been agreed, the Council is content that the final adopted version presents the best strategy for Waltham Forest when compared against reasonable alternatives.

# Appendix One: Monitoring Indicators

| Primary SA Objective(s) (noting that all are inter-related) | Local Plan Policy | Key Monitoring Indicators | Targets (where applicable) |
|---|---|---|---|
| SA1: Meet local housing needs through the provision of a range of tenures and sizes of new dwellings<br><br>SA19: Improve the local economy by enabling employment developments in appropriate places<br><br>SA20: Maintain stable levels of employment in the Borough | Policy 2 'Scale of Growth' | Number of net additional dwellings:<br>• Granted or deemed granted planning permission<br>• Started<br>• Completed<br><br>Amount of additional floorspace<br>• Granted or deemed granted planning permission<br>• Started<br>• Completed | 27,000 net additional homes delivered between 2020 and 2035<br><br>52,000 sqm of employment floorspace (Class E G, B2, B8) |
| SA3: Improve standard of health and wellbeing of those who live and work in the Borough<br><br>SA4: Improve community cohesion and reduce inequalities through the provision of community facilities to meet local cultural, educational, recreational and social needs<br><br>SA5: Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system, reducing car use for all journey lengths | Policy 3 'Infrastructure for Growth' | Status of key infrastructure projects<br><br>Change in school capacity<br>• additional school places<br><br>Number of GPs in borough<br><br>Broadband coverage level<br>• number of homes with Full-fibre, Superfast and Ultrafast<br><br>CIL Income<br><br>Other infrastructure projects (as reported in IDP and IFS) | |

| | | | |
|---|---|---|---|
| SA1: Meet local housing needs through the provision of a range of tenures and sizes of new dwellings<br><br>SA4: Improve community cohesion and reduce inequalities through the provision of community facilities to meet local cultural, educational, recreational and social needs<br><br>SA7: Reduce greenhouse gas emissions and promote low carbon growth<br><br>SA9: Improve air quality<br><br>SA11: Reduce the risk of flooding and improve resilience to climate change<br><br>SA12: Ensure the efficient use of land and buildings and protect soil quality and geological resources<br><br>SA13: Conserve and enhance biodiversity and the natural environment, improving resilience to climate change<br><br>SA14: Protect the ecological integrity of SSSI and Natura 2000 sites<br><br>SA15: Maintain and enhance the quality of the green belt and open space areas | Policy 4 'Location of Growth' | Number of new homes in each area and Strategic Location<br>• Granted or deemed granted planning permission<br>• Started<br>• Completed<br><br>Net additional floorspace and jobs equivalent in each area and Strategic Location<br>• ranted or deemed granted planning permission<br>• Started<br>• Completed | South Waltham Forest: A minimum of 13,340 new homes and 3,250 new jobs in the identified Strategic Locations<br><br>Central Waltham Forest: A minimum of 6,810 new homes and 1,600 jobs in the identified Strategic Locations<br><br>North Waltham Forest: A minimum of 1,710 new homes and 1,940 jobs in the identified Strategic Locations<br><br>A minimum of 5,150 new homes outside the identified Strategic Locations. |

| | | | |
|---|---|---|---|
| SA16: Maintain and improve local distinctiveness<br><br>SA19: Improve the local economy by enabling employment developments in appropriate places | | | |
| SA1: Meet local housing needs through the provision of a range of tenures and sizes of new dwellings<br><br>SA4: Improve community cohesion and reduce inequalities through the provision of community facilities to meet local cultural, educational, recreational and social needs<br><br>SA9: Improve air quality<br><br>SA11: Reduce the risk of flooding and improve resilience to climate change<br><br>SA12: Ensure the efficient use of land and buildings and protect soil quality and geological resources<br><br>SA14: Protect the ecological integrity of SSSI and Natura 2000 sites<br><br>SA15: Maintain and enhance the quality of the green belt and open space areas<br><br>SA16: Maintain and improve local distinctiveness | Policy 5 'Management of Growth' | Proportion of new retail and town centre uses in:<br>• Strategic Locations<br>• Designated Centres<br>    o by number of units and floorspace (m2)<br><br>Total floorspace in designated employment areas<br><br>Number of jobs created in employment areas<br><br>Total area (ha) of designated sites and areas (Green Belt, Metropolitan Open Land, Special Protection Areas, Ramsar Sites, Conservation Areas, and Listed Buildings), number of listed buildings<br><br>Proportion of development which occurs on Previously Developed Land | |

| | | Number of sites on the Brownfield Land Register<br>• Part 1<br>• Part 2<br><br>Number and status of Masterplans, Area Frameworks, SPDs, Planning Briefs | |
|---|---|---|---|
| SA17: Conserve and enhance the historic built environment<br><br>SA19: Improve the local economy by enabling employment developments in appropriate places<br><br>SA20: Maintain stable levels of employment in the Borough | | | |
| SA1: Meet local housing needs through the provision of a range of tenures and sizes of new dwellings | Policy 12 'Increasing Housing Supply' | Total number of new homes (net and gross):<br>• Approved<br>• Started construction<br>• Completed | Measured for each Financial Year against the stepped requirement set out in Local Plan policy |
| SA1: Meet local housing needs through the provision of a range of tenures and sizes of new dwellings | Policy 13 'Delivering Genuinely Affordable Housing' | Percentage and Total number of new homes (net and gross) disaggregated by tenure:<br>• Approved<br>• Started Construction<br>• Completed | 50% of all new homes to be genuinely affordable across the Plan Period |
| SA1: Meet local housing needs through the provision of a range of tenures and sizes of new dwellings | Policy 14 'Affordable Housing tenure' | Percentage of homes (gross) on schemes of more than 10 units by tenure:<br>• Approved<br>• Started Construction<br>• Completed | 70% of homes to be low cost affordable rent<br><br>30% to be of intermediate tenure |
| SA1: Meet local housing needs through the provision of a range of tenures and sizes of new dwellings | Policy 15 'Housing size and mix' | Percentage and Total number of homes by number of bedrooms:<br>• Approved<br>• Started Construction<br>• Completed<br><br>Percentage of schemes which achieve the desired proportion<br><br>Total performance against | As set out in local plan policy |

| | | overall target mix | |
|---|---|---|---|
| SA1: Meet local housing needs through the provision of a range of tenures and sizes of new dwellings<br><br>SA3: Improve standard of health and wellbeing of those who live and work in the Borough | Policy 16 'Accessible and Adaptable Housing' | Total number of M4(3) dwellings:<br>• Approved<br>• Started Construction<br>• Completed<br><br>Percentage of completed new build homes which meet M4(2)<br><br>Percentage of completed new build homes which meet M4(3) | M4(2) – 90% of all new build self-contained homes<br><br>M4(3) – 10% of all new build self-contained homes |
| SA1: Meet local housing needs through the provision of a range of tenures and sizes of new dwellings<br><br>SA12: Ensure the efficient use of land and buildings and protect soil quality and geological resources | Policy 17 'Redevelopment and Intensification of Existing Housing Estates' | Percentage of developments resulting in an increased density (disaggregated by affordability):<br>• Approved<br>• Started Construction<br>• Completed | Any loss of housing to be replaced by new housing at existing or higher densities with at least the equivalent level of overall floorspace<br><br>Development provides at least the identical or equivalent level of affordable housing floorspace |
| SA1:Meet local housing needs through the provision of a range of tenures and sizes of new dwellings | Policy 18 'Other forms of housing' | Number of Build to Rent, Purpose Built Student Housing and Purpose Built Shared Living Housing homes:<br>• Approved<br>• Started Construction<br>• Completed | |
| SA1:Meet local housing needs through the provision of a range of tenures and sizes of new dwellings<br><br>SA12: Ensure the efficient use of land and buildings and protect | Policy 19 'Small Sites' | Change in number of HMOs and conversions:<br>• Approved<br>• Started Construction<br>• Completed<br><br>Number of applications refused | |

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| soil quality and geological resources | | Number of conversions approved/refused/ completed by:<br><br>• Floorspace (>or <124 sqm)<br>• Car Free<br>• Meets cycle parking standards | |
| SA1: Meet local housing needs through the provision of a range of tenures and sizes of new dwellings | Policy 22 'Gypsies and Travellers and Travelling Showpeople' | Number of pitches for Gypsies and Travellers | Up to 9 pitches to meet need identified to 2033 |
| SA1: Meet local housing needs through the provision of a range of tenures and sizes of new dwellings<br><br>SA3: Improve standard of health and wellbeing of those who live and work in the Borough<br><br>SA4: Improve community cohesion and reduce inequalities through the provision of community facilities to meet local cultural, educational, recreational and social needs | Policy 21 'Supported and Specialist Accommodation' | Number of units of C3 older persons/C2 residential nursing care accommodation:<br>• Approved<br>• Started Construction<br>• Completed | London Plan target – 110 per annum (C3 older persons – sheltered and extra care) |
| SA4: Improve community cohesion and reduce inequalities through the provision of community facilities to meet local cultural, educational, recreational and social needs<br><br>SA19: Improve the local economy by enabling employment developments in appropriate places | Policy 24 'Supporting Economic Growth and Jobs' | Change in employment floorspace (sqm) by use class disaggregated by location:<br>• Approved<br>• Completed | 52,000 sqm of additional employment floorspace, including 36,600 sqm of storage and distribution floorspace, during the plan period |

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| SA20: Maintain stable levels of employment in the Borough | | | |
| SA19: Improve the local economy by enabling employment developments in appropriate places<br><br>SA20: Maintain stable levels of employment in the Borough | Policy 25 'Safeguarding and Managing Change in Strategic Industrial Locations (SIL)' | Floorspace change in SIL by use class:<br>• Approved<br>• Completed | No net loss of industrial floorspace |
| SA19: Improve the local economy by enabling employment developments in appropriate places<br><br>SA20: Maintain stable levels of employment in the Borough | Policy 26 'Safeguarding and Managing Change in Locally Significant Industrial Sites (LSIS)' | Floorspace change in LSIS by use class:<br>• Approved<br>• Completed | No net loss of industrial floorspace |
| SA19: Improve the local economy by enabling employment developments in appropriate places<br><br>SA20: Maintain stable levels of employment in the Borough | Policy 27 'Safeguarding and Managing Change in Borough Employment Areas' | Floorspace change in BEA by use class:<br>• Approved<br>• Completed | No unevidenced net loss of employment floorspace |
| SA19: Improve the local economy by enabling employment developments in appropriate places<br><br>SA20: Maintain stable levels of employment in the Borough | Policy 28 'Approach to Non-Designated Employment Land' | Floorspace change outside of SIL, LSIS and BEA by Use Class | |
| SA4: Improve community cohesion and reduce inequalities through the provision of community facilities to meet local cultural, educational, recreational and social needs | Policy 35 'Promoting Culture and Creativity' | Change in the number of cultural venues | |

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| SA16: Maintain and improve local distinctiveness | | | |
| SA4: Improve community cohesion and reduce inequalities through the provision of community facilities to meet local cultural, educational, recreational and social needs<br><br>SA16: Maintain and improve local distinctiveness | Policy 36 'Protecting Public Houses (Pubs)' | Change in the number of pubs | |
| SA4: Improve community cohesion and reduce inequalities through the provision of community facilities to meet local cultural, educational, recreational and social needs<br><br>SA18: Maintain and enhance the vitality and viability of the Borough's town centres<br><br>SA19: Improve the local economy by enabling employment developments in appropriate places | Policy 39 'New Retail, Office and Leisure Developments' | Change in floorspace disaggregated by use class and location | |
| SA4: Improve community cohesion and reduce inequalities through the provision of community facilities to meet local cultural, educational, recreational and social needs<br><br>SA16: Maintain and improve local distinctiveness | Policy 40 'Revitalisation, Adaptation and Regeneration in Designated Centres and Parades' | Vacancy rates | |

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| SA18: Maintain and enhance the vitality and viability of the Borough's town centres<br><br>SA19: Improve the local economy by enabling employment developments in appropriate places | | | |
| SA4: Improve community cohesion and reduce inequalities through the provision of community facilities to meet local cultural, educational, recreational and social needs<br><br>SA16: Maintain and improve local distinctiveness<br><br>SA18: Maintain and enhance the vitality and viability of the Borough's town centres<br><br>SA19: Improve the local economy by enabling employment developments in appropriate places | Policy 41 'Managing Changes of Use In and Outside Primary Shopping Areas' | Percentage of primary shopping area in E Class Part A use. | |
| SA2 Reduce crime and the fear of crime<br><br>SA4: Improve community cohesion and reduce inequalities through the provision of community facilities to meet local cultural, educational, recreational and social needs<br><br>SA16: Maintain and improve local distinctiveness | Policy 46 'Social and Community Infrastructure' | Change in floorspace of social and community infrastructure | |

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| SA3: Improve standard of health and wellbeing of those who live and work in the Borough<br><br>SA5: Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system, reducing car use for all journey lengths | Policy 48 'Promoting Healthy Communities' | Life expectancy<br><br>Indices of Multiple Deprivation | |
| SA3: Improve standard of health and wellbeing of those who live and work in the Borough | Policy 51 'Hot Food Takeaways' | Change in the number of A5 hot food takeaways | |
| SA3: Improve standard of health and wellbeing of those who live and work in the Borough | Policy 52 'Betting Shops and Payday Loan Shops' | Change in the number of betting shops and payday loan shops | |
| SA16: Maintain and improve local distinctiveness<br><br>SA17: Conserve and enhance the historic built environment<br><br>SA1: Meet local housing needs through the provision of a range of tenures and sizes of new dwellings<br><br>SA12: Ensure the efficient use of land and buildings and protect soil quality and geological resources | Policy 54 'Tall Buildings' | Number of developments of tall buildings (exceeding 10 storeys, or 30m when measured from the ground) | |
| SA3: Improve standard of health and wellbeing of those who live and work in the Borough<br><br>SA5: Improve opportunities for access to local services, facilities and | Policy 60 'Promoting Sustainable Transport' | To be monitored by the Local Implementation Plan (LIP) | |

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| employment through an integrated sustainable transport system, reducing car use for all journey lengths<br><br>SA7: Reduce greenhouse gas emissions and promote low carbon growth<br><br>SA8: Conserve energy<br><br>SA9: Improve air quality<br><br>SA14: Protect the ecological integrity of SSSI and Natura 2000 sites | | | |
| SA16: Maintain and improve local distinctiveness<br><br>SA17: Conserve and enhance the historic built environment | Policy 70 'Designated Heritage Assets' | Change in the number of designated heritage assets:<br>• Conservation Areas;<br>• Statutorily Listed Buildings;<br>• Archaeological Remains (in Archaeological Priority Areas). | |
| SA16: Maintain and improve local distinctiveness<br><br>SA17: Conserve and enhance the historic built environment | Policy 71 'Listed Buildings' | Change in the number of listed buildings | |
| SA16: Maintain and improve local Distinctiveness<br><br>SA17: Conserve and enhance the historic built environment | Policy 75 'Locally Listed Heritage Assets' | Change in the number of locally listed buildings | |
| SA3: Improve standard of health and wellbeing of those who live and work in the Borough<br><br>SA9: Improve air quality | Policy 77 'Green Infrastructure and the Natural Environment' | Change in area (hectares) designated as MOL/MGB | |

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| SA11: Reduce the risk of flooding and improve resilience to climate change<br><br>SA12: Ensure the efficient use of land and buildings and protect soil quality and geological resources<br><br>SA13: Conserve and enhance biodiversity and the natural environment, improving resilience to climate change<br><br>SA14: Protect the ecological integrity of SSSI and Natura 2000 sites<br><br>SA15: Maintain and enhance the quality of the green belt and open space areas<br><br>SA16: Maintain and improve local distinctiveness | | | |
| SA9: Improve air quality<br><br>SA10: Improve water quality in rivers and groundwater and ensure the efficient use of water resources<br><br>SA11: Reduce the risk of flooding and improve resilience to climate change<br><br>SA12: Ensure the efficient use of land and buildings and protect soil quality and geological resources | Policy 79 'Biodiversity and Geodiversity' | Units of Biodiversity Net Gain (BNG) secured against units lost<br><br>Total area of SINC | Minimum 10% biodiversity net gain using the Defra Biodiversity Metric 2.0, on development sites. |

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| SA13: Conserve and enhance biodiversity and the natural environment, improving resilience to climate change<br><br>SA14: Protect the ecological integrity of SSSI and Natura 2000 sites<br><br>SA15: Maintain and enhance the quality of the green belt and open space areas | | 41 | |

| SA3: Improve standard of health and wellbeing of those who live and work in the Borough

SA9: Improve air quality

SA13: Conserve and enhance biodiversity and the natural environment, improving resilience to climate change

SA14: Protect the ecological integrity of SSSI and Natura 2000 sites

SA15: Maintain and enhance the quality of the green belt and open space areas

SA16: Maintain and improve local distinctiveness | Policy 81 'Epping Forest and the Epping Forest Special Area of Conservation' | Visitor Uplift in Suitable Alternative Natural Greenspaces (SANGs), ascertained through visitor surveys before and after intervention. To include counts of visitors (per day) and visitor origination

SANG capacity in relation to homes delivered.

Total expenditure on SANG sites and breakdown of expenditure (delivery/maintenance)

SANG Ecological Surveys (SES):
• number of condition surveys carried out
• site condition rating (eg: good - needs improvement - poor)

No harm to the Epping Forest SAC arising from traffic growth, based on the number of trips to/from a development site compared with the level set out in the submitted Transport Assessment and Air Quality Study 2

The condition of Epping Forest Special Area of Conservation's SAC qualifying features | Achieve visitor uplift for each SANG at the level set out in the SANG strategy and Green and Blue Spaces SPD. This will be monitored and reported annually in line with housing delivery.

No increase in the number of vehicle trips to/from a development site above the level set out in Air Quality Study 2 |
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| | | (Beech woodland, holly shrub layer and stag beetles), including any evidence of negative effects from recreational pressure, urban effects and air quality. | |
| SA3: Improve standard of health and wellbeing of those who live and work in the Borough

SA15: Maintain and enhance the quality of the green belt and open space areas | Policy 84 'Food Growing and Allotments' | Change in number of allotments | No net loss |
| SA3: Improve standard of health and wellbeing of those who live and work in the Borough | Policy 85 'A Zero Carbon Borough' | Proportion of major development submitting an energy assessment
Proportion of development meeting | |

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| SA7: Reduce greenhouse gas emissions and promote low carbon growth<br><br>SA8: Conserve energy<br><br>SA9: Improve air quality<br><br>SA11: Reduce the risk of flooding and improve resilience to climate change<br><br>SA13: Conserve and enhance biodiversity and the natural environment, improving resilience to climate change<br><br>SA14: Protect the ecological integrity of SSSI and Natura 2000 sites | | zero-carbon emissions target<br><br>% carbon Reductions proposed below part L from the Be Lean stage of the energy hierarchy.<br><br>Number of Energy masterplans in progress<br><br>COF contributions | |
| SA3: Improve standard of health and wellbeing of those who live and work in the Borough<br><br>SA7: Reduce greenhouse gas emissions and promote low carbon growth<br><br>SA8: Conserve energy<br><br>SA9: Improve air quality<br><br>SA11: Reduce the risk of flooding and improve resilience to climate change | Policy 86 'Decentralised Energy' | Proportion of developments of:<br> a) 1 or more home or >100m2 located within 200m of existing or committed decentralised energy network<br>b) Major development located within 500m of an existing or committed decentralised energy network<br><br>which connect to the decentralised energy network | |
| SA3: Improve standard of health and wellbeing of those who live and work in the Borough<br><br>SA6: Prevent production of waste, improve resource efficiency and | Policy 87 'Sustainable Design and Construction' | Proportion of proposals which achieve BREAAM rating:<br>• Unclassified<br>• Pass<br>• Good | |

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| increase recycling and recovery<br><br>SA7: Reduce greenhouse gas emissions and promote low carbon growth<br><br>SA8: Conserve energy<br><br>SA9: Improve air quality<br><br>SA11: Reduce the risk of flooding and improve resilience to climate change<br><br>SA13: Conserve and enhance biodiversity and the natural environment, improving resilience to climate change | | • Very Good<br>• Excellent<br>• Outstanding<br><br>Number of proposals which are accredited by HQM and Passivhaus<br><br>Number of schemes recycling: -<br>• 0-15%<br>• 15-35%<br>• 35-50%<br>of demolition and construction material<br><br>Proportion of developments which have a green roof<br><br>UGF Score of development | |
| SA3: Improve standard of health and wellbeing of those who live and work in the Borough<br><br>SA5: Improve opportunities for access to local services, facilities and employment through an integrated sustainable transport system, reducing car use for all journey lengths<br><br>SA7: Reduce greenhouse gas emissions and promote low carbon growth<br><br>SA8: Conserve energy<br><br>SA9: Improve air quality<br><br>SA13: Conserve and enhance biodiversity and the natural environment, improving | Policy 88 'Air Pollution' | Changes in Nitrogen Oxides (NOx), Ammonia (NH3), Nutrient Nitrogen deposition and Acid deposition | |

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| resilience to climate change<br><br>SA14: Protect the ecological integrity of SSSI and Natura 2000 sites<br><br>SA15: Maintain and enhance the quality of the green belt and open space areas | | | |
| SA10: Improve water quality in rivers and groundwater and ensure the efficient use of water resources<br><br>SA11: Reduce the risk of flooding and improve resilience to climate change<br><br>SA13: Conserve and enhance biodiversity and the natural environment, improving resilience to climate change | Policy 91 'Managing Flood Risk' | Number of planning applications approved and refused with reason for refusal as flood risk where development proposals are required to carry out the sequential test and exception test.<br><br>Number of sites, and total gross units permitted in Flood Zone 1, 2 and 3.<br><br>Contributions received for flood risk mitigations | |