

# London Borough of Haringey

## Draft Core Strategy Pre-Submission

### Sustainability Appraisal Report

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#### Non-Technical Summary



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#### Non-Technical Summary

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# ABBREVIATIONS

AQMA	Air Quality Management Area
AAI	Areas of Archaeological Importance
AAP	Area Action Plan
BAP	Biodiversity Action Plan
BREEAM	British Research Establishment Environmental Assessment Method
CABE	Commission for Architecture and the Built Environment
CHD	Coronary Heart Disease
CO <sub>2</sub>	Carbon Dioxide
DCLG	Department for Communities and Local Government
DfT	Department for Transport
DPD	Development Plan Documents
EA	Environment Agency
EC	European Commission
EH	English Heritage
EU	European Union
GCSE	General Certificate of Secondary Education
ICT	Information and Communication Technology
IMD	Index of Multiple Deprivation
ktpa	kilo tonnes per annum
LBH	London Borough of Haringey
LDA	London Development Agency
LDD	Local Development Document
LDF	Local Development Framework
LNR	Local Nature Reserve
NASS	National Asylum Support Service
NE	Natural England
NLSA	North London Strategic Alliance
NO <sub>2</sub>	Nitrogen Dioxide
NVQ	National Vocational Qualification
ODPM	Office of the Deputy Prime Minister
ONS	Office of National Statistics
PDL	Previously Developed Land
PM <sub>10</sub>	Particulate Matter
PPG	Planning Policy Guidance
PPPs	Policies, Plans and Programmes

PPS	Planning Policy Statement
RQO	River Quality Objective
RSS	Regional Spatial Strategy
SA	Sustainability Appraisal
SEA	Strategic Environmental Assessment
SOA	Super Output Areas
SPD	Supplementary Planning Document
SSSI	Site of Special Scientific Interest
SuDS	Sustainable Drainage Systems
TNO	Total Notable Offences
UDP	Unitary Development Plan
VAT	Value Added Tax

# HOW TO COMMENT ON THE SUSTAINABILITY APPRAISAL REPORT

This SA Report has been issued for consultation alongside London Borough of Haringey's Pre-Submission Core Strategy report. Details on how to comment on the Sustainability Appraisal Report are provided below.

Public Consultation on the Draft Core Strategy DPD Pre-submission and its Sustainability Appraisal Report runs from April-May 2010 for six weeks.

Please address any consultation responses to the Policy Planning Team at the address below:

Planning, Policy and Development  
London Borough of Haringey  
639 High Road, Tottenham,  
London N17 8BD

Copies of the documents are also available for public inspection free of charge during normal opening times at the public libraries and the Council offices at the following locations:

- 639 High Road, Tottenham, N17 8BD; and
- Civic Centre, Wood Green, N22 8LE.

Your comments are invited on this SA Report. Please send them to the above address or by e-mail to [LDF@Haringey.gov.uk](mailto:LDF@Haringey.gov.uk).

All the comments must be received by April-May 2010.

# NON-TECHNICAL SUMMARY

This section provides a non-technical summary of the assessment of the Pre-Submission Core Strategy, describing the Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) process undertaken and the findings of the study.

## Background

The London Borough of Haringey's (LBH) Local Development Framework (LDF) will replace the current Unitary Development Plan adopted in 2006. The LDF is a collection of documents (Local Development Documents (LDDs)) containing policies and proposals to guide future development in the area.

A key Local Development Document is the Core Strategy Development Plan Document (DPD), which sets out the spatial vision and strategic policies for the development of the borough.

As part of the preparation of the Core Strategy, the Council is required to undertake a SA. SA is mandatory for DPDs under the requirements of the Planning and Compulsory Purchase Act (2004). SAs of DPDs should also incorporate the requirements of the European Directive 2001/42/EC, known as the SEA Directive. This Directive is transposed into law by the Environmental Assessment of Plans and Programmes Regulations 2004 (Statutory Instrument. 2004 No. 1633) (the SEA Regulations).

This SA was prepared to assess the economic, social and environmental effects of the DPD. The purpose of the SA is to promote sustainable development through better integration of sustainability considerations into the preparation of the Core Strategy. As part of this process, a combined SA and SEA is being undertaken. The term, SA shall be used to refer to the combined SA/SEA for the remainder of this report.

This report describes the results of the SA process and how it has influenced the draft Core Strategy policies and their development. A separate set of appendices should be viewed alongside this summary report. These include:

- Appendix A: Review of plans, programmes and policies;
- Appendix B: Baseline data; and
- Appendix C: Policy Appraisal matrices

The SA approach adopted was based on the process set out in the government guidance on SA of Regional Spatial Strategies and Local Development Frameworks (LDF)<sup>1</sup> which has recently been updated by the Plan Making Manual and guidance on SEA<sup>2</sup>.

## Scoping

During the early stages of the DPD development, a scoping stage was undertaken to propose and agree the appraisal methodology and to collate the information needed to carry out the appraisal. The appraisal needed to be set within the context of existing plans and policies and an understanding of the current baseline situation was essential to predict effects and identify key sustainability issues and problems.

The scope of the SA was agreed at an early stage by key stakeholders involved in the SA process, as part of consultation on the SA Scoping Report. Those consulted included the

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<sup>1</sup> ODPM (now DCLG) (2005) Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks

<sup>2</sup> ODPM (2005) A Practical Guide to Strategic Environmental Assessment.



statutory consultees (Natural England, English Heritage, Environment Agency) and Friends of the Earth. This Scoping Report, which was prepared in June 2007 (Hyder Consulting (2007) Reference No.5000 - LN00993 – LNR - 01), sets out the original context and the proposed approach to the appraisal process.

## Relationship to other Plans, Programmes and Objectives

The purpose of reviewing other plans and programmes and sustainability objectives is to ensure that the relationship with these other documents and requirements are explored to enable the LBH to take advantage of any potential synergies and to deal with any inconsistencies and constraints. The plans, programmes and sustainability objectives that need to be considered include those at international, national, regional and local scale.

There were no major inconsistencies identified, although several plans were the source of policies, objectives and conditions that provided the context for the Core Strategy. The key links were the Haringey Unitary Development Plan (UDP), the Haringey's Community Strategy: A sustainable way forward and the London Plan (2008).

## Baseline Characteristics

The collection and analysis of information about the current and likely future state of the LBH focused on the key issues and the potential significant effects of the Core Strategy. The baseline topics included population, health, deprivation and environmental factors. Key trends and targets were identified, along with any difficulties and limitations in the data.

Data sources include those held and collated by LBH, other plans and programmes and established data sources, such as the Office of National Statistics. Environmental, population, health, indices of deprivation and socio economic data collected were based on borough-wide data because the Core Strategy would apply to the whole borough.

## The Sustainability Appraisal Framework

The formation of SA Objectives and sub-objectives (sometimes referred to as the SA Framework) is central to the SA process and provides a way in which sustainability effects can be described, assessed and compared. The analysis of other plans, programmes and policies, baseline data and the identified social, economic and environmental issues have been used to develop a framework of SA Objectives against which the plan and the options considered in the development of the plan, have been appraised. The development of the SA Objectives was also informed by the scoping consultation. The SA Objectives are presented in the table below.

## Sustainability Appraisal Framework

SA Objective		Sub-Objectives
1	To reduce crime, disorder and fear of crime.	To encourage safety by design.
		To reduce levels of crime.
		To reduce the fear of crime.
		To reduce levels of anti-social behaviour.
		To reduce alcohol and drug misuse.
2	To improve levels of educational attainment for all age groups and all sectors of society.	To increase levels of participation and attainment in education for all members of society.
		To improve the provision of, and access to, education and training facilities.
3	To improve physical and mental health for all and reduce health inequalities.	To improve access to health and social care services.
		To prolong life expectancy and improve well-being.
		To promote a network of quality, accessible open spaces.
		To promote healthy lifestyles.
4	To provide greater choice, quality and diversity of housing across all tenures to meet the needs of residents.	To reduce homelessness.
		To increase the availability of affordable housing.
		To improve the condition of Local Authority housing stock.
		To improve the diversity of the housing stock.
5	To protect and enhance community spirit and cohesion.	To promote a sense of, cultural identity, belonging and well-being.
		To develop opportunities for community involvement.
		To support strong relationships between people from different backgrounds and communities.
6	To improve access to services and amenities for all groups.	To improve access to cultural and leisure facilities.
		To maintain and improve access to essential services (banking, health and education) and facilities.
7	To encourage sustainable economic growth and business development across the Borough.	To retain existing local employment and create local employment opportunities.
		To diversify employment opportunities.
		To meet the needs of different sectors of the economy.
8	To develop the skills and training needed to establish and maintain a healthy labour pool.	To improve lifelong learning opportunities and work related training.
		To reduce high levels of unemployment and worklessness.
9	To encourage economic inclusion.	To improve physical accessibility to local and London-wide jobs.
		To support flexible working patterns.
		To encourage new businesses.
10	To improve the vitality and vibrancy of town centres.	To enhance the environmental quality of the borough's town centres.
		To promote the borough's town centres as a place to live, work and visit.

SA Objective		Sub-Objectives
		To ensure that the borough's town centres are easily accessible and meet local needs and requirements.
		To promote high quality buildings and public realm.
11	To protect and enhance biodiversity.	To protect and enhance Priority Species and Habitats identified in the Biodiversity Action Plan.
		To link and enhance habitats and wildlife corridors.
		To provide opportunities for people to access wildlife and diverse open green spaces.
12	To protect and enhance the borough's townscape and cultural heritage resources.	To promote townscape character and quality.
		To preserve or enhance buildings and areas of architectural and historic interest.
13	To protect and enhance the borough's landscape resources.	To promote a network of quality, accessible open spaces.
14	To protect and enhance the quality of water features and resources.	To preserve ground and surface water quality.
		To conserve water resources.
15	To encourage the use of previously developed land.	To encourage the development and remediation of brownfield land.
		To promote the efficient and effective use of land whilst minimising environmental impacts.
16	To adapt to climate change.	To reduce and manage flood risk.
		To encourage 'green design' solutions.
		To encourage the inclusion of Sustainable Drainage Systems (SuDs) in new development.
17	To protect and improve air quality.	To manage air quality within the borough.
		To encourage businesses to produce travel plans.
18	To limit climate change by reducing CO <sub>2</sub> emissions.	To reduce the use of energy.
		To increase energy efficiency and support affordable warmth initiatives.
		To increase the use of renewable energy.
19	To ensure the sustainable use of natural resources.	To reduce the consumption of raw materials (particularly those from finite or unsustainable sources).
		To encourage the re-use of goods.
		To reduce the production of waste.
		To support the use of sustainable materials and construction methods.
		To increase the proportion of waste recycling and composting across all sectors.
20	To promote the use of sustainable modes of transport.	To improve the amenity and connectivity of walking and cycling routes.
		To promote the use of public transport.

SA Objective	Sub-Objectives
	To reduce the use of the private car.

Initially, the DPD's vision and objectives were appraised against the SA Objectives. This appraisal showed that there is potential for conflict with some environmental SA Objectives and DPD objectives which aimed to increase growth, if not managed sustainably. Recommendations were made to improve the sustainability performance of the DPD Objectives. The results of the Appraisal are presented in Section 4.1 of the Main Report and Appendix C.

## Developing and Assessing the Core Strategy Options

Various options for development were proposed at the Issues and Options stage in December 2007. Consultation for the Issues and Options was carried out from 8 February to 31 March 2008. The methodology for carrying out the SA, as proposed at the scoping stage, was used to test each of these options and predict their significant positive and negative impacts on the SA Objectives. Recommendations were made regarding the most sustainable options in June 2008 and these suggestions were fed into the plan-making process, alongside the public consultation responses. The options were further refined and four spatial options were identified for the Core Strategy. The SA provided an initial appraisal on the spatial options (Options Discussion Paper – Initial Sustainability Options Appraisal (October 2008)), identifying which options had addressed the SA Objectives well.

Following this, the four spatial options, including a 5<sup>th</sup> Option, a “market driven” approach were appraised against the SA Objectives.. This appraisal identified which option was the most sustainable and which option was the least sustainable. The details of the assessment are provided in Section 4.3 of the Main Report.

The Core Strategy Preferred Options Report set out the vision, spatial objectives and preferred options, based on the spatial approach. The SA on the Preferred Options appraised the preferred and alternative options and provided findings on which options were likely to address the SA Objectives. The SA also provided recommendations on how the sustainability performance of the policies could be improved. The findings are presented in Section 4.4 of the Main Report and Appendix D.

The Core Strategy Preferred Options Report and the accompanying SA were consulted on from 5 May until 30 June 2009. Following consultation, draft policies to implement the vision, objectives and preferred policy options have been developed.

## Appraising Policies

Based on the preferred option, strategic policies were developed by the Council and presented in the Core Strategy Pre-Submission Report. The process of testing the policies examined the likely significant effects of the draft Core Strategy strategic policies on the key social, economic and environmental objectives which have been identified for the borough. The details of this assessment are provided in Section 5 of the Main Report and Appendix F. During this assessment, measures were suggested to mitigate adverse effects and enhance beneficial effects to further improve the sustainability of each policy. A summary of the key significant effects of the Core Strategy and proposed mitigation to offset negative effects are provided below.

### *People at the Heart of Change*

The Managing Growth (SP1) policy provides the overall approach behind development in the borough and proposes how the Core Strategy policies will contribute towards sustainable

development. This policy provides the sustainability context to the rest of the Core Strategy and for the forthcoming DPDs to be prepared by the borough. The key potential positive effects which could result from the *People at the Heart of Change* policies include:

- Regeneration of areas suffering from physical, social and economic deprivation (Haringey Heartlands, Tottenham Hale, Seven Sisters, Northumberland Park and Wood Green) which should help alleviate poverty, achieve social equity and improve the quality of life for most deprived residents.
- Concentrating growth in a few areas with existing facilities and services should minimise the need to travel and make the most efficient use of the existing resources.
- Provision of a significant number of affordable homes should assist in alleviating current need and associated deprivation – approximately 4,865 affordable dwellings a year would be provided for the next five years. These will be of a mixture of dwelling types and tenure to meet the borough's needs.
- Provision of transport, social infrastructure and community facilities.
- Improvements to the public realm, improved pedestrian linkages to Wood Green and Haringey Heartlands and provision of green infrastructure projects.
- Introduction of measures to reduce flood risk in Tottenham Hale, through re-culverting of the Moselle Brook, application of sustainable drainage systems and supporting measures to reduce water consumption.
- Creation of a new Green Industries Centre at Marsh Lane, which will facilitate a borough-wide recycling facility.
- Commercial regeneration of key locations (Northumberland Park) and promotion of mixed use and employment generating uses in town centres (Wood Green) should result in economic and social benefits.

While the majority of effects arising from these policies are likely to be positive, there is still potential for some significant negative effects. These effects are likely to result from the scale of development being proposed. Policy SP1, which set out the level of growth in the borough, is likely to have the most negative effects. These effects are particularly on the environmental objectives, caused by the construction and operation of the new developments proposed. These include increased resource use, energy and water consumption, air and noise pollution, traffic and congestion.

Policy SP2 will also have some negative effects due to the level of housing development proposed. The potential negative effects from these policies, as a result of the level of development and increase in population, include:

- Increase in resource use, energy and water consumption, emissions and waste generation. The level of growth proposed will result in an approximate 15% increase in population by 2026. While the Draft Core Strategy and the Development Management DPD will seek to mitigate this by including policies to minimise water and energy use, waste production, emissions from transport and energy generation, there will still be net increase.
- Increase in noise pollution and nuisance from construction activities, increased traffic and high density development. Other policies seek to address these, such as the SP11 on Design and policies on sustainable construction; and SP7 on transport, which promotes the use of public transport, walking and cycling.
- Increase in traffic and congestion and pollution. Other policies seek to address these through promoting walking and cycling and concentrating housing, employment and retail in growth areas, which should reduce the need to travel.

Policy SP3 will protect existing sites for Gypsies and Travellers. Provisions include measures relating to new sites or alterations to existing sites. The policy seeks to protect the environment and ensure that there will be no harm to the residential amenity of nearby properties.

### *An Environmentally Sustainable Future*

Under this key objective are four policies: SP4 (Working towards a Low Carbon Haringey), SP 5 (Water Management and Flooding), SP6 (Waste and Recycling), SP7 (Transport) which seek to deliver a sustainable environment by requiring developments to meet standards relating to energy, water management, waste and transport. These policies perform very well against the sustainability objectives and the effects are likely to be mostly positive, with a limited number of likely negative effects. The key potentially positive effects of these policies include the following:

- Ensuring new developments adapt to the potential impacts of climate change and do not make it worse in the future. This includes the identification of mechanisms to meet energy and carbon emission targets, reducing the need to travel, minimising flood risk and promoting sustainable urban drainage and waste management.
- Improved health as a result of enhanced environmental quality, easy access to open spaces and promotion of walking and cycling.
- Requirements for sustainable design and construction and sustainable waste management to minimise consumption of materials and resources, waste generation and pollution and promote energy efficiency, renewable energy, recycling and water conservation.
- Integration of public transport and infrastructure into planning and development proposals and reducing the need to travel in order to minimise air pollution and congestion which could result from new development.

The majority of the effects of these policies are positive but there may be negative impacts, which include:

- Temporary local environmental impacts, such as noise, dust and disturbance relating to infrastructure to be developed (e.g. heat and energy facilities, waste management facilities) under Policy SP4 (Working towards a Low Carbon Haringey), SP6 (Waste and Recycling) and SP7 (Transport).

### *Economic Vitality and Prosperity Shared by All*

The policies under this key objective, SP8 (Employment) SP9 (Improving skills and training to support access to jobs and community cohesion and inclusion) and SP10 (Town Centres) seek to encourage the expansion of employment and business opportunities to create a more diversified economy and the development of town centres, including Wood Green. Although employment related developments have the potential to have beneficial economic effects, they will potentially have negative environmental impacts and implications on resource use, energy use and waste generation.

The development of Wood Green and other centres and employment areas may increase traffic in those areas. The improvement of skills and training (SP9) policy is generally positive and efforts to promote improvement in training facilities is likely to support businesses and employment opportunities.

The key potential positive effects from these Economic Vitality policies include:

- Protecting existing employment land uses is likely to ease pressure on Greenfield sites for employment development.

- Facilitating training opportunities for the local population.
- Promoting diversification of the borough's economy and supporting industries and small and medium sized enterprises.
- Environmental and amenity improvements through the reuse/redevelopment of employment land in regeneration areas.
- Better employment opportunities in the borough could reduce the need to travel.

Key potentially negative effects from the Economic Vitality policies include:

- Promoting certain types of industries, such as distribution uses may generate freight and lorry traffic which could result in increase in road traffic, noise and pollution.
- Increase in water consumption and pollution by businesses and industrial use.
- Increase in energy use through increased business and industrial activities.
- Increased retail activity may increase waste production and resources use.
- Developing Wood Green as a centre for north London may generate trips from outside Haringey. However, the development of the district centres may reduce travel within the borough.

### *Safer for all*

The policies under this key objective SP11 (Design), SP12 (Conservation) and SP13 (Open space and Biodiversity) have the potential to deliver a quality environment. The policies cover aspects including: design quality; conservation; and open space and biodiversity.

The key potential positive sustainability effects arising from A Safer, Attractive and Valued Urban Environment policies include:

- Enhanced public realm, townscape and landscape, particularly in areas such as Tottenham Hale and Seven Sisters, where environmental quality is low.
- Improved health as a result of greater provision and improved access to open spaces through the green infrastructure.
- Conserve and enhance biodiversity through improving open spaces and provision of green and brown roofs in new developments.
- Reduction in crime and fear of crime by promoting 'Secure by Design' in new developments.
- Improved performance of new developments including pollution prevention, sustainable design and construction.

The key potential negative effects from A Safer, Attractive and Valued Urban Environment policies include:

- Potential to restrict availability of land for residential, industrial and commercial uses by providing new open spaces and protecting existing ones.
- Local environmental impacts (e.g. dust, noise, traffic) which could result from developments.



## *Healthier people with a better quality of life*

The policies under this key objective SP14 (Health and Well-Being) and SP15 (Culture and Leisure) aim to deliver the facilities and infrastructure to improve health and well being in Haringey. The policies relating to health and culture are generally positive policies. The key positive sustainability effects arising from the *Healthier people with better quality of life* policies include:

- Improved health as a result of greater provision of health, sports and leisure and cultural facilities, particularly in areas of deficiency.
- Improvement in training facilities, which could lead to better employment opportunities.
- Greater community cohesion through development of cultural quarters and sports provision, particularly in deprived areas.

The key negative effects arising from the *Healthier people with better quality of life* policies include:

- Local environmental effects (noise, dust, disturbance) arising from development of health and cultural facilities and infrastructure.
- Potentially restricting the availability of land for residential, industrial and commercial use by developing facilities (health, sports and cultural).

## *Delivering and Monitoring the Core Strategy Mitigation*

The policies under this objective, Policy SP16 and SP17 concerns proposes measures to deliver the Core Strategy. Policy 16 seeks to provide residents with community facilities. Policy SP17 provides the mechanisms to deliver improvements and infrastructure. Their contribution to environmental SA Objectives such as air quality, climate change and sustainable use of resources are uncertain. It is acknowledged that other policies in the Core Strategy address environmental issues and Planning Obligations have been put forward for mitigating the impacts of a development. The key positive contributions of this policy include:

- Improved facilities and infrastructure, particularly in growth areas and deprived parts of the Borough.
- Improved community facilities which may promote community cohesion.
- Increased provision of affordable housing.
- Environmental and local amenity improvements through provision of public realm and spaces and regeneration.
- Improvement in education, training and skills.
- Improved health from provision of health facilities;

There are no major negative impacts from these policies include the following:

- Localised environmental impacts (dust, noise, disturbance) as a result of development of infrastructure and facilities.
- Potentially restricting the availability of land for residential, industrial and commercial use by developing community infrastructure (schools, leisure, youth facilities).



## Mitigation

Mitigation measures have been proposed to address the potential effects of the Core Strategy DPD. These relate to the policies within Appendix C, but in summary, consist of the following:

- Amendments to existing policy wording.
- Cross referencing to other policies to address the negative effects of others/options
- Lower tier Development Plan Documents will implement mitigation measures, for example, the Site Allocations DPD.
- Identification of areas requiring further study, for example, through an Environmental Impact Assessment.

## Monitoring

An important part of the process is establishing how the significant sustainability effects of implementing the Core Strategy will be monitored. The establishment of a set of sustainability indicators will enable the environmental, social and economic impacts of the Core Strategy policy to be monitored and appropriate remedial action undertaken.

This SA Report includes a draft monitoring framework of appropriate indicators and possible remedial actions. The final list of indicators will be provided in the Final SA Report to be prepared with the Submission Core Strategy. It is envisaged that monitoring would be on an annual basis, dependent upon the specific indicators selected and the frequency they are updated. These will be included as appropriate as significant effects indicators in Haringey Council's Annual Monitoring Report Framework.

## Difference the SA Process has made

The SA and development of the Core Strategy has been an iterative process, with the findings of the SA informing the development of the options and policies. The SA process has ensured that the LBH's Core Strategy embodies the principles of sustainable development. For example, recommendations on the Issues and Options Report were made to LBH's Planning Officers to improve sustainability of options in addressing issues, which helped the Planning Officers in the further development of options. Furthermore, recommendations were made during the preparation of the SA of the Core Strategy Preferred Options to improve the sustainability of policy options, as described in Section 4 of the main report. The recommendations helped inform the development of the draft strategic policies in the Pre-Submission Core Strategy. This SA presents the findings of the assessment of the strategic policies and makes recommendations.

## Consultation

There have been two formal stages of consultation and public participation throughout the appraisal process. This consultation on the pre-Submission Core Strategy and this SA is the third stage of consultation. The Main Report provides details on how the appraisal has been amended in the light of the responses received.

## Future Stages

The Pre-Submission Core Strategy Report and this SA will be consulted on from April to May 2010. The information in the SA Report and responses to the final consultation must be taken into account during the preparation of the DPD before it is finalised for submission to the

Secretary of State for an independent examination. The Final Sustainability Appraisal Report will assess any significant changes as a result of representations and will form part of the evidence base and will be used to assess the soundness of the DPD.